



Fylde Council Local Plan to 2032

COPIES OF REPRESENTATIONS MADE TO THE EVIDENCE CONSULTATION

Part 4 of 7

September 2017

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Planning Policy
 Fylde Council
 Town Hall
 St Annes
 Lancashire
 FY8 1LW
 Email: planningpolicy@fylde.gov.uk
Sent by email only

25th August 2017

Dear Sir / Madam

Fylde Local Plan: Consultation on Additional Evidence

1. Thank you for consulting with the Home Builders Federation (HBF) on the Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032 (hereafter referred to as '*Additional Evidence*').
2. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. The Council will be aware of previous HBF comments made on the Publication version of the plan, dated 22nd September 2016 and in relation to the Stage 1 and Stage 2 Examination Hearing Sessions. These issues are still considered relevant. The following response relates directly to the new evidence contained in Additional Evidence consultation document.

Economic Forecasts, Objectively Assessed Needs and the Housing Requirement Figure

4. The Additional Evidence document identifies an increase in the Objectively Assessed Housing Need (OAHN) from an average 370dpa to 415dpa over the plan period. It is understood that this increase is required to take account of the 2014 based Sub-National Population Projections and Sub-National Household Projections (2014 SNPP and SNHP) and further analysis of potential future jobs-growth in Fylde. The evidence in relation to the revised OAHN is presented in Annex 1, Appendix 1 '*Fylde Addendum 3: Analysis of the OAN in light of the 2014-based SNPP and SNHP*' and Annex 1, Appendix 2 '*Independent Assessment of the Economic Prospects of Fylde*'.

5. Whilst the HBF welcomes the increase in the OAHN we remain of the opinion that this still falls short of a positively prepared assessment of OAHN in Fylde. Our reasons for this are set out below.

Demographic Starting Point

6. The updated assessment suggests a minimum demographic need of 351dpa. This is based upon the use of the 2014 based SNPP and SNHP with adjustments for longer-term migration patterns and improved household formation rates for younger households. This is supported and is consistent with our previous comments upon this issue.

Implications of Employment Growth

7. It is understood that the OAHN has been aligned with the new evidence provided by AMION, included within Annex 1, Appendix 2 of the Additional Evidence document. The HBF supports the principal of alignment of the OAHN with future jobs growth. This is consistent with both the NPPF (para.158) and PPG (ID 2a-018).
8. The AMION analysis suggests the creation of between 900 and 1,500 additional jobs over the plan period, or 55 to 91 jobs per annum. This is somewhat short of the previous AECOM analysis contained within the Employment Land Review (exam ref: ED041a) which suggested 2,400 jobs over the plan period or 141 jobs per annum. We previously made comments that whilst it is recognised this is a 'policy-on' position it is considered that this would provide alignment between the Council's housing and employment strategies as required by the NPPF (paragraph 158). Given that the AECOM report was provided as evidence to support employment land provision this is still considered to be valid. The previous work on housing need indicates, based upon 2012 SNPP and SNHP, a housing requirement of 440 to 450dpa is required.
9. The HBF understands that the difference between the AECOM and AMION reports is largely due to the treatment of the two Enterprise Zones. Section 3 of the AMION report suggests that there is not sufficient evidence to include an allowance under the baseline scenario for additional employment growth in Fylde from the Enterprise Zones. The Council agrees with this stance in its summary, paragraph 2.18 of the Additional Evidence document. Whilst it is recognised there is uncertainty the Council's position completely disregards any potential levels of jobs growth associated with the two Enterprise Zones, thus raising the question how will the plan respond when the sites begin to deliver?

10. The HBF considers that a positively prepared plan which seeks to effectively align housing and economic growth should take the potential development at these sites into account. To do otherwise is unsound and contrary to the wider ambitions for the plan. At the very least the plan should include a trigger mechanism for plan review once the delivery on these sites is known.
11. The AMION assumptions create a need for between 410 and 430dpa. The AMION report concludes that the growth should be at the upper end of this range. It therefore appears odd that the Council has chosen a mid-point figure of 415dpa. A more positive approach based upon the evidence before the Council and taking account of the potential of the two Enterprise Zones would be to set the figure at a minimum of 430dpa.

Updated Market Signals

12. The HBF agrees that the market signals indicate a need for an uplift to the demographically based figure. In particular affordability, concealed families and overcrowding all warrant an uplift. The HBF also agrees that these signals are not as severe as in other authorities and below national averages. On this basis a 10% uplift is considered appropriate.

Conclusion

13. Whilst the HBF welcomes the increase in the OAHN the figure of 415dpa is still considered too low. By the Council's own evidence a figure at the top end of the range should be pursued. This would require an OAHN of 430dpa. However, we remain of the opinion that the economic and housing strategies should be aligned. The economic strategy of the Council includes growth at the two Enterprise Zones. It is therefore considered appropriate that the housing requirement takes account of this. Based upon the Council's previous evidence this would require the figure to be increased to 450dpa.

Five-Year Housing Supply and the Housing Trajectory

14. The Council's updated five year supply statement is included in Annex 2 of the Additional Evidence document. The updated supply continues to assert that the Council can demonstrate a five year supply of housing land.

Housing Requirement

15. Notwithstanding our concerns with the level of the housing requirement the HBF agrees with the calculation of the five year supply set out at the end of paragraph 8, including the use of a 20% buffer.

Deliverable Sites

16. Paragraph 9 indicates the sources of supply used to identify the five year supply. The sources are generally considered acceptable. However caution must be applied to those which do not yet benefit from planning permission, including allocations. This is because of the uncertainty over delivery associated with such sites. It is therefore considered a general non-implementation discount is required. This is discussed in greater detail below.
17. It is also noted that the five year supply calculation includes 50 homes per year for long-term empty properties re-entering the market (Annex 2, Appendix 1). The justification and evidence for this is unclear and therefore it is not considered justified. The PPG is clear (ID 3-039) that;

“Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by the local planning authority at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double counting (local planning authorities would need to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in their local plans).”

18. It is therefore considered that this element of the supply should be deleted.

Build out and phasing

19. The HBF is pleased to note that the Council has adjusted its build out and phasing based upon evidence put forward at the examination sessions (para 13). This is consistent with our previous comments upon this issue.
20. In terms sites where details are presumably unknown assumed build out rates are set out in paragraph 12, these are considered appropriate. It should not, however, be simply assumed that because a site is greater than 300 units more than one developer will be active on the site. The HBF is aware of a number of sites above this threshold which are being delivered by a single developer. It is therefore

imperative that this be confirmed with the developer / site promoter prior to such an assumption being made.

21. In terms of the assumed commencement table at the end of paragraph 14 these should also be verified by the land owner / developer where possible. It should also be recognised that larger / more complex sites often take longer to commence on site. This does not appear to be factored into the assumptions.

Development not being implemented

22. The HBF disagrees that the 10% non-implementation allowance should only be applied to small sites. Whilst it is recognised detailed discussions were held on larger sites these cannot foresee all eventualities, particularly where permission is yet to be granted. Sites can either not deliver or stall for a wide variety of reasons.
23. The assumption that all larger sites will deliver as anticipated is therefore unrealistic. On this basis the HBF continues to recommend a 10% non-implementation allowance be applied to all permissions.
24. On this basis it is noted that the Council cannot identify a five year supply, based upon the Sedgefield approach to under-delivery (table 1c, Annex 2), discussed below.

Different Approaches to Five Year Housing Supply

25. The HBF supports the '*Sedgefield*' method of delivery. This requires delivery of any under-supply within the first five years. This is consistent with the principals set out within the PPG (ID 3-035). Any deviation from this methodology must be accompanied by robust evidence.
26. It is noted that despite the Council's contention that it can demonstrate a five year supply using either the '*Liverpool*' or '*Sedgefield*' methods it wishes to utilise the '*Liverpool*' method by spreading the under-delivery over the plan period (paragraph 3.27 of the Additional Evidence document). This effectively means the needs identified now will not be delivered in full until much later in the plan period.
27. The Council's rationale for using this approach is supply based due to identified slippages on known sites and the precarious five year supply identified in table 1, Annex 2. This appears a somewhat negative approach. A more positive approach

would be to identify additional sources of supply which could bolster delivery in the five year period.

28. Additional supply is considered in paragraphs 3.10 to 3.18 of the Additional Evidence document. This section of the document suggests that because the plan can, at least in theory, deliver its full housing requirement only small sites, below 15 units should be considered. The HBF fails to understand the logic of this. Whilst sites of less than 15 units could add to the five year supply, so could larger sites. The fact that larger sites would not fully deliver in the five years is largely irrelevant. They would simply assist in providing a greater delivery buffer.
29. The provision of a delivery buffer would be consistent with the plan in that 415dpa should not be seen as a maximum but rather a minimum. Furthermore it would provide greater certainty that the overall plan requirement was met in full should any sites fail to deliver at the rates identified.
30. The Council will also be aware of the '*housing delivery test*' suggested in the Government's recent Housing White Paper¹. This will require action to be taken if delivery falls below 95% of the Council's annual housing requirement. The inclusion of additional sites would appear to be a reasonable step in trying to ensure the requirement is met as a minimum over the whole of the plan period, not just the first five years.

Information

31. The HBF would like to be made aware of the following;
- Further examination hearing sessions;
 - The publication of the examiner's recommendations and any publicly available correspondence regarding the plan; and the
 - Adoption of the plan.

Yours sincerely,



Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229

¹ DCLG 2017: Fixing our broken housing market

Eddie Graves

From: Flood Risk Management <FRM@lancashire.gov.uk>
Sent: 03 August 2017 15:33
To: Sally Thompson; PlanningPolicy
Cc: Taylor, Dianne
Subject: RE: CONSULTATION on additional evidence in support of the Fylde Local Plan to 2032

Dear Sally & Team,

Having read your consultation letter, I consider that my team has no involvement in the issues raised and we therefore have no comment to make. Thank you for the opportunity to consider this.

If I have misunderstood or overlooked something that you definitely want our advice on, please don't hesitate to contact me again and I'll be happy to work with you.

Yours sincerely,

Rachel

Rachel Crompton
Flood Risk Manager
Highway Service
Community Services
Lancashire County Council
T: 07917-068592
www.lancashire.gov.uk

From: Sally Thompson [<mailto:sally.thompson@fylde.gov.uk>]
Sent: 02 August 2017 14:14
To: Sally Thompson <sally.thompson@fylde.gov.uk>
Cc: PlanningPolicy <PlanningPolicy@fylde.gov.uk>
Subject: CONSULTATION on additional evidence in support of the Fylde Local Plan to 2032

Dear Sir/Madam,

The Council is consulting on evidence it has produced for the Examination of its Local Plan to 2032, which is being conducted by an Inspector on behalf of the Secretary of State, see attached letter. The consultation starts on 3 August 2017 and closes at 5pm on the 14 September 2017.

The evidence concerns:

- The explanation of the Council's new housing requirement figure of 415 new homes per year in the borough;
- A revised housing supply statement, showing how the plan will provide for the required housing, including a 5-year supply;
- A note of the settlement hierarchy, explaining in particular that the position of Elswick in the hierarchy in the plan is correct; and
- An updated Gypsy and Traveller Accommodation Assessment, which reflects the change to the Government's definition of Gypsies and Travellers.

The evidence document also provides commentary on the implications for the Local Plan and Sustainability Appraisal. The document can be found at:

<http://www.fylde.gov.uk/council/planning-policy--local-plan-/local-development-framework/www-fylde-gov-uk-examination/>

The Council welcomes comments on the evidence which should be made by email to PlanningPolicy@fylde.gov.uk or by letter to Planning Policy, Fylde Council, Town Hall, Lytham St. Annes FY8 1LW. Please make clear which part of the document you are referring to (i.e. Annex/page number) when responding.

Kind Regards
Planning Policy Team

Sally Thompson
Research and Information Officer
Fylde Borough Council

DDI: 01253 658686

Main: 01253 658658

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Planning Policy
Fylde Borough Council
Town Hall
LYTHAM ST ANNES
Lancashire
FY8 1LW

Phone: (01772) 537397
Email: stephanie.shone@lancashire.gov.uk
Your ref:
Our ref: MH/SS/NH
Date: 11 September 2017

Dear Sir/Madam

FYLDE LOCAL PLAN TO 2032: CONSULTATION ON ADDITIONAL EVIDENCE IN SUPPORT OF THE FYLDE LOCAL PLAN TO 2032

Thank you for consulting Lancashire County Council on the additional evidence in support of the Fylde Local Plan to 2032.

At this stage, I offer Education comments.

Observations and Recommendations

As the education authority, Lancashire County Council are statutory obliged to provide school places for children living in Lancashire. To facilitate this the Schools Planning engage and liaise with colleagues from the district Planning Teams across Lancashire to understand and evaluate impact of housing on local schools.

The district local plans adopted or emerging set out the most accurate information and sets out the aspirations of the district in regards to housing. Lancashire County Council provide information in return the effect new housing will have across the education provision to be included in the local plan. This latest consultation follows on from recent comments returned to specific questions raised by the inspector after Stage 1 hearings from the examination in public.

Policy HW2 paragraph 76 Reference to the need for an additional secondary school within the timescale of the plan. What are the timescales for delivery, and has consideration been given to potential site locations?

Lancashire County Council response has been included in evidence document EL6.031e and accept this is a true record of the information provided. The situation remains the same that a requirement for a new secondary school will be required at a point in time of the local plan. The exact location and delivery date are still subject to further discussions with Fylde Officers and Councillors through the liaison meetings, and Fylde Borough Council duty to co-operate.

For this latest consultation Fylde Borough Council has produced, 'The Additional Evidence in Support of the Fylde Local Plan to 2032' document. The document includes the updated Local Plan Trajectory Appendix 2, and sets out housing to be delivered from 2017 up to the end of the plan 2032.

The updated position at Appendix 2 includes latest housing build out rates and phasing supplied from developers and agents across strategic and non-strategic sites. In responding to this latest position, Schools Planning assume the targets will be achieved within the term of the plan and recognise the revision of 415 dwellings delivered per annum is now a **minimum** and not referred to as a **target** in previous versions of the plan. It is a view from Fylde Borough Council the previously under delivered housing supply will be met through the Liverpool or Sedgefield approach. Adopting either approach would result in a high annual target of delivery, this is indicated within the consultation document tables 1 and 2.

Based on the updated information in the trajectory, Schools Planning are able to provide an updated education forecast. Schools Planning adopts a worst case scenario at 4 bedroom until bedroom mix is clarified at the planning or reserved matters stage, assuming all the homes will be built. Producing a 5 year forecast annually is achieved from information received from the Planning Authority Housing Land Supply (HLS) or Annual Monitoring Report AMR.

Based on the latest information the table below indicates the yield of children in primary and secondary up to 2032 and is broken into three five year periods.

Sites	17/18	18/19	19/20	20/21	21/22	Total
Strategic	163	191	262	207	130	
Strategic	122	122	114	105	137	
Strategic	75	56	95	110	133	
Strategic	114	126	173	151	155	
Non-strategic	86	105	151	66	103	
Sub Total	560	600	795	639	658	3252
Allowance and Windfall Sites	119	119	119	51	50	458
Five Year Total	679	719	914	690	708	3710
3710	0.38	1410	Primary yield worst case scenario			
3710	0.17	630	Primary yield average			
3710	0.15	556	Secondary yield worst case scenario			
3710	0.09	333	Secondary yield average			

Sites	22/23	23/24	24/25	25/26	26/27	Total
Strategic	130	125	100	100	100	
Strategic	172	165	165	128	120	
Strategic	170	150	140	105	60	
Strategic	91	60	35	30	30	
Non-strategic	73	39	11	0	0	
Sub Total	636	539	451	363	310	2299
Allowance and Windfall Sites	40	40	40	40	40	200
Ten Year Total	676	579	491	403	350	2499
2499	0.38	950	Primary yield worst case scenario			
2499	0.17	425	Primary yield average			
2499	0.15	374	Secondary yield worst case scenario			
2499	0.09	225	Secondary yield average			

Sites	27/28	28/29	29/30	30/31	31/32	Total
Strategic	100	100	100	0	0	
Strategic	120	100	90	90	90	
Strategic	20	0	0	0	0	
Strategic	30	30	6	0	0	
Non-strategic	0	0	0	0	0	
Sub Total	270	230	196	90	90	876
Allowance and Windfall Sites	40	40	40	40	40	200
Fifteen Year Total	310	270	236	130	130	1076
1076	0.38	408	Primary yield worst case scenario			
1076	0.17	182	Primary yield average			
1076	0.15	161	Secondary yield worst case scenario			
1076	0.09	97	Secondary yield average			
Total Yield 15 Years						
7285	0.38	2768	Primary yield worst case scenario			
7285	0.17	1238	Primary yield average			
7285	0.15	1092	Secondary yield worst case scenario			
7285	0.09	655	Secondary yield average			

In Section 3 of the consultation document paragraph 3.1 to 3.3, it refers to the five year housing supply statement and monitoring changes. Lancashire County Council Schools Planning welcome the approach to simplifying the information to include site-by-site

housing trajectory for the full plan period. The timescale required to plan and deliver new schools or expansion to existing schools requires careful timing to deliver at the point of need following the statutory process. Improvements to the monitoring and reporting systems will provide the most accurate position.

In conclusion, the inspector assigned to examine the local plan has raised particular questions and clarification from Fylde Borough Council. Schools Planning have responded directly or through a one council response regarding areas that affect school planning across the district. Lancashire County Council welcome the information and clarification received in the latest consultation document, in particular the improvements to the housing trajectory and confirmation of the minimum dwellings to be built per annum.

Over many years the two authorities have liaised and provided two way information at various stages of the emerging local plan, in particular strategic sites that include a new primary school provision and a site for new secondary provision.

The constraints within existing schools to accommodate the impact from housing developments and the requirement of developer contributions to enable expansion have been highlighted to Fylde.

Currently, discussions with a number of secondary schools across the district have taken place to explore opportunity to address the shortfall with the secondary provision. However the long term need of the local plan would still require a new secondary school provision. Current negotiations with existing schools to unlock potential would make it difficult to predict when a new provision will be required and will keep Fylde borough Council updated on progress, when and where the need will be to secure a suitable site for development.

The close proximity of Fylde to Blackpool and Wyre Councils requires further monitoring to understand the border relationship of inward and outward migration from its schools. Schools Planning understand there is a current planning application for a new free through school in the Blackpool area. It is unclear at this early stage, if this new school will have any adverse effect on existing schools in Fylde. Schools planning will continue to monitor the situation as it develops.

I trust these comments are helpful in the preparation of the Fylde Local Plan to 2032.

Should you have any query, please feel free to contact me.

Yours faithfully

A black rectangular redaction box covering the signature of Marcus Hudson.

Marcus Hudson
Planning Manager

13 September 2017

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

Dear Sir/Ms

FYLDE LOCAL PLAN 2032
CONSULTATION ON ADDITIONAL EXAMINATION EVIDENCE (EL7.002)
MACTAGGART & MICKEL LTD (REF: 34)

We write on behalf of our clients, Mactaggart & Mickel Ltd, with regard to the additional consultation on the Examination evidence presented by Fylde Borough Council to support the Local Plan 2032.

We noted the questions posed by the Inspector in her letter to the Council of the 3rd July 2017 (EL5.014) which specifically required consideration of;

- a) Can sites proposed to be delivered later in the plan period be brought forward and seek to assist with the five year land supply?
- b) Are there additional sites that conform with the Plan's strategy that can be deliverable within the first five years?

Fylde Council have responded with a consultation document which considers the following housing related matters;

2. Objectively Assessed Need (OAN) and Housing Requirement Figure

Mactaggart & Mickel attended the Stage One session of the Examination and agree with the approach now taken by Fylde Council in taking account of the most recent 2014 Sub National Household Projections. This has led to the Council revising the housing requirement figure upwards from 370 units per annum to 415 units per annum. It is noted that the OAN range is from 410-430 units per annum and the Council has favoured a figure, 415 pa, that is at the lower end

of this range. In exercising their planning judgement (para 2.4 – EL7.002) the Council have been conservative and Mactaggart & Mickel believe it would have been considered reasonable, to have selected the mid-point in the range, 420 units per annum, this being justified, effective and consistent with national policy. On this basis we would encourage the Inspector to concur with our client on this matter and agree to 420 units pa. This will also assist in elevating the level of affordable housing provision in the Council area.

3. Five Year Housing Supply and Housing Trajectory

Mactaggart & Mickel have examined the five year housing land supply statement (Annex 2) in the consultation document. It is considered that this document is exceptionally optimistic in the completion numbers to be achieved and the speed at which these will be attained. This is particularly pertinent for larger strategic sites that have yet to be started, examples being 2018/19 completions for Queensway, St Annes (HSS1), Heyhouses Lane, St Annes (MUS4), Blackfield End Farm, Warton (HSS2) and Brookfarm, Kirkham (HS57). It is considered that short term unit numbers and speed/timing of delivery are too optimistic.

In addition, it is also noted that a number of strategic sites have been programmed to start contributing unit numbers in year five of the trajectory. These include Cropper Road, Whitehills (MUS 1), Whyndyke Farm, Whitehills (MUS2), land north of Freckleton, Warton (HSS12), Clifton House Farm, Warton (HSS13), Newton Hall, Newton (HS51) and Oak Lane, Newton (HS52).

Drawing this analysis together, it is considered that Fylde Council have sought to provide the most beneficial position possible in their five year housing land supply statement. The temptation to undertake such a positive position is understood after consistent years of under performance in delivering sufficient housing and the questions raised by the Inspector on the 3rd July 2017. Using the Sedgefield method, the Council claim that they attain a 5.1 year housing land supply, essentially just meeting the minimum requirement for a five year land supply. Based on a little basic analysis, as detailed in the preceding paragraphs and without rigorously assessing each individual site, it is considered that the Council's five year housing land supply statement assessment is over-optimistic and that when considered in a more realistic manner, the Council will still fail to attain a five year land supply, when the plan is adopted. This position is unacceptable to Mactaggart & Mickel and runs contrary to the aims of preparing a Local Plan, which seeks to give local communities certainty going forward and fails to positively seek opportunities to meet the development needs of the area, as required by paragraph 14 of the NPPF.

Thereafter from paragraph 3.5 (EL7.002) the Council then seek to consider the questions posed by the Inspector (EL5.014). The first is whether sites could be brought forward in terms of being able to deliver more units within the five year period. The Council has brought the delivery of small sites to within three years as opposed to the previous five. Mactaggart & Mickel maintain the comments of previous paragraphs that the revised trajectory is too optimistic. The Council then readily acknowledge that even on this basis, in paragraph 3.8, that this has resulted in a 'marginally improved position' in relation to the five year housing land supply. Mactaggart & Mickel maintain the view that the Council do not have a five year land supply, when the trajectory is subject to initial assessment, let alone detailed. On this basis and in answer to the Inspectors

question on bringing sites forward within the five year period, it is therefore self-evident that this alone does not provide a solution to seeking to meet and provide a robust five year land supply at the adoption date of the Local Plan.

The second question from the Inspector is whether additional sites are required that conform with the Plan's strategy that can be deliverable within the first five years. The Council, based on their analysis, summarised above, unsurprisingly indicate that they do not believe that additional sites are required. This is despite the fact that they 'marginally' attain a five year land supply, based on their own optimistic housing trajectory. Mactaggart & Mickel's view is that to ensure a robust five year land supply going forward and to address the Inspector's question, that additional housing sites are required, which are deliverable within the five year period. Mactaggart & Mickel have a 50 units site at Moss Side Lane, Wrea Green, it is considered that these units could be delivered within five years, with 10 units in year three, and 20 units in years four and five. This would deliver 50 units within five years and the site is sustainable and conforms with the Plan's overall strategy.

Mactaggart & Mickel were not present at the Stage 2 session of the Examination, as this concerned allocated sites in the Local Plan, They do not however, concur with the reasoning and assumption in paragraph 3.12 (EL7.002) that a site with a single developer will only be able to proceed with delivering housing units in year five. The leap of thought thereafter in paragraph 3.13 (EL7.002), that this would lead to sites of a strategic size adversely impacting allocated sites and providing an excess of development, later in the plan period, is not supported. Fylde Borough have consistently failed to provide sufficient housing within their Council area and have had a significant number of planning appeals upheld against them, due to their failure to have a Local Plan in place that provides a robust housing land supply going forward. To be concerned with an excess of development demonstrates that the Council is still exceptionally reluctant to provide a generous housing land supply of deliverable sites in their Local Plan. Mactaggart & Mickel find this position untenable. The Inspector is requested to address this key matter and organise Stage 3 of the Examination, where deliverable sites that conform with the Plan's strategy can be considered and assessed. Any failure to do so will leave the Council in the same predicament as they have experienced over the last five years, seeking to defend sites at appeal. The Local Plan Examination offers an opportunity to address this matter conclusively going forward on the basis the Council has failed to significantly boost the supply of housing, as required by paragraph 47 of the NPPF.

The suggestion in paragraph 3.14 (EL7.002) that only sites of 15 units and under should be considered, is less than logical in our view and seeks to avoid the issue at hand, delivering a robust and consistent five year housing land supply. The vague promise that further brownfield sites will be 'unearthed' going forward is based on no evidence before this Examination.

Mactaggart & Mickel have examined the reasons offered for a reluctance for further greenfield development, as detailed in paragraph 3.16 (EL7.002). They have ecological evidence that their development site will not impact winter feeding birds or the SPA and believe that the highways position is not based on evidence that is robust or which would stand up to scrutiny, with particular regard to the Mactaggart & Mickel site. This is a further reason, in the view of Mactaggart & Mickel, for requesting that the Inspector organises a Stage 3 of the Examination, to consider these matters in detail and on an evidential basis.

Having reviewed paragraphs 3.19-3.27 inclusive (EL7.002), Mactaggart & Mickel believe that the Sedgefield method requires to be followed for the five year land supply. This seeks to meet the backlog of housing units and historic under performance in providing the required houses within the five year period that seeks to meet the identified need. This is the most appropriate means via which to boost supply and provide choice and competition in the housing market. This approach is most consistent with the language of the Framework and is advocated by PPG (paragraph 35). The view of Mactaggart & Mickel is that additional sites are required that are deliverable, so the difficulty the Council envisage, is not a view that they share.

Mactaggart and Mickel have no further comments on items 4-7 inclusive in the consultation document.

CONCLUSION

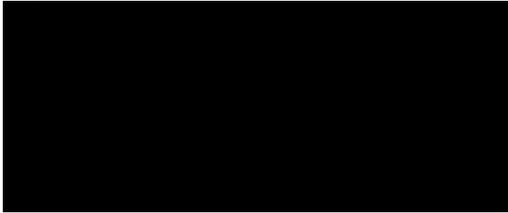
Mactaggart & Mickel have reservations with regard to key aspects of the Local Plan with regard to the delivery of housing within Fylde Council based on the consultation document on additional evidence as a result of the Examination (EL7.002). In summary these concerns relate to the following matters;

- OAN should be set at 420 units per annum.
- Over optimistic programming contained in the five year housing land supply statement.
- The Council not attaining a five year land supply when the Local Plan is adopted, when matters are reviewed in initial detail and which will struggle to provide this going forward in the future.
- A Local Plan that fails to deliver sufficient housing sites that are deliverable.
- A requirement for additional deliverable housing sites that are deliverable within the five year period. Mactaggart & Mickel have such a site in Wrea Green.
- An inaccurate set of reasons offered for not allowing further greenfield development.
- Wishing to utilise the Liverpool method when the Sedgefield method addresses the issues to be tackled in meeting the housing backlog and failure to meet the housing requirement to date.

Drawing these matters together, the view of Mactaggart & Mickel is that the Inspector is requested to consider these key matters and organise Stage 3 of the Examination, to allow these matters to be addressed in detail.

If there are any questions on any aspect of this submission, please do not hesitate to contact the writer.

Yours faithfully



Anthony H Aitken MRTPI
HEAD OF PLANNING

[REDACTED]
Elswick

Lancashire

[REDACTED]
7th September 2017

Dear Sir,

Elswick Tier 2 Status Endorsement

I write to endorse and fully support the Tier 2 status of Elswick in the Settlement Hierarchy. In my view, Fylde Council's response paper entitled Additional Evidence in Support of the Fylde Local Plan to 2032 accurately assesses the Tier 2 determination, summarised in paragraph 1.24 on page 213 and explained in detail in Section 4 paragraphs 4.1 to 4.4 on page 10 and Annex 3 on pages 205 to 313.

There are two significant aspects being incorrectly promoted by the developer:

Bus Services. The number 78 service from Poulton to St Annes was withdrawn in April 2016. It is essential to note that this reduction of 50% took place **after** classification of Elswick as Tier 2 – thus further reducing the sustainability score. The developer's statement that services to the village have increased is a work of fiction, it is untrue, misleading and demonstrably not the case.

Copp School. The developer has suggested that Great Eccleston Copp C of E School be included in the Settlement Hierarchy Assessment. The Council's own work has confirmed that the school is not within an acceptable walking distance of Elswick. It is 1,260 metres away (260 metres beyond the maximum acceptable distance), along Copp Lane which is a very busy road subject to a 40mph limit. There is only a single footpath to the school which is just one metre wide along some of its length. It is not possible to walk along the footpath in summer due to overgrown hedges.

It is worthwhile also to repeat additional factors underpinning the Tier 2 Status classification. The overall status assessment is a comparative exercise that takes many factors influencing sustainability into account – all of which have a bearing on the assessment. These are:

- The Tier 1 villages in Fylde are all at least 50% bigger than Elswick and all of them are on the edge of urban conurbations thus having access to considerably more facilities.
- Elswick is the same size as other Tier 2 Villages such as Clifton and Singleton. (460 houses)
- Elswick is one of the most remote and least sustainable villages in Fylde. It has no school, no health centre, takeaway or doctors surgery and is six miles from the nearest supermarket.
- There is no industry or employment in Elswick. Most people are employed 10 miles away in Blackpool.

I hope that the above information is taken into account in the Planning Department's rebuttal of the developer's argument

Yours faithfully

[REDACTED]
Martin Clayden

Fylde Council Local Plan Examination

Consultation on Additional Evidence Published by the Council in Support of Fylde Local Plan

Representation on behalf of Metacre Ltd

14th September 2017

Introduction

1. This representation is made for and on behalf of Metacre Ltd to the consultation document recently published by Fylde Borough Council, titled 'Additional Evidence in Support of their Fylde Local Plan to 2032'.

OAN and Housing Requirement

2. NPPF 14 confirms that Local Plans should positively seek opportunities to meet the development needs of their area and **should be able to meet objectively assessed needs with sufficient flexibility to adapt to rapid change**. NPPF 17 identifies one of the core planning principles of the planning system, which it states should underpin both plan-making and decision-taking, being to proactively drive and support sustainable development to deliver the homes that the county needs, with every effort made objectively to identify and then meet these needs.
3. NPPF 47 requires local planning authorities to 'boost significantly' the supply of housing, which includes using "*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*" (self emphasis).

4. One of the core planning principles set out in NPPF 17 is that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units that the country needs. NPPF 152 confirms that Local Plans should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and deliver net gains across all three. NPPF 7 highlights that the economic role of sustainability includes contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. It also acknowledges the key role of delivering adequate housing in this regard, with NPPF 21 stating that **planning policies should recognise and seek to address potential barriers to investment such as a lack of housing**. Similarly NPPF 7 confirms that providing housing to meet the needs of present and future generations is a key social role of sustainability.

OAN

5. Submitted with this representation is a statement prepared by Chillmark Consulting which raises concerns regarding the Council's suggested OAN range of 408-432 dpa¹. In particular the OAN range does not take full account of the published and committed investment plans of the Lancashire Enterprise Partnership and two Government designated and funded Enterprise Zones located in and immediately adjacent to the Borough. This is despite the Enterprise Zones being real, operational and growing now. For example the supporting evidence by Chillmark demonstrates that the Blackpool Airport Enterprise Zone has had significant success during the first year of operation. 450 new jobs were created which is a rate of growth twice what would be expected if the 3,000 target new jobs were delivered equally across each year between 2015 and 2030.

Identified Local Plan Housing Requirement

6. The consultants appointed by the Council to undertake the OAN update (Turley) recommend in paragraph 6.38 of their May 2017 report that:

*"Whilst a range of OAN for housing has been concluded – associated with the range of job growth considered reasonable within the Independent Economic Assessment – it is recognised that this report concludes that it is **'expected...that the likely level of employment growth will be at the upper end of this range'**⁸⁹. It is therefore considered that **the full need for housing***

¹ Council's consultation document refers to 410-430 but evidence base confirms that it is 408-432 at Table 6.1 of addendum 3

will be more closely aligned with the upper end of the identified OAN range.” (self emphasis)

7. Bearing in mind the above recommendation is also made in the context of the Council’s evidence already failing to take full account of the economic effect of the Enterprise Zones, there is simply no justifiable basis for the housing requirement to be at the lower end of the OAN range. This is without prejudice to the evidence by Chillmark demonstrating that the OAN range itself should also be higher.
8. It is also clear from the Council’s evidence base that Fylde’s affordable housing needs are acute, sustained and that affordability is a significant issue. The Council’s selection of the 415 dpa figure, which is at the lower end of the FOAN scenarios identified in their SHMA, fails to make adequate provision for meeting the Borough’s affordable housing needs. This planned provision would result in a serious and significant level of under-provision of affordable housing.
9. The Local Plan therefore fails to meet the aforementioned economic and social elements of sustainability advocated in NPPF and in so doing is not consistent with national policy. It is also not positively prepared as it is not based on a strategy which seeks to meet full objectively assessed development requirements.
10. It is noted that paragraph 2.6 of the Consultation document refers to there being only two occasions since 1991 where completions have been higher than 415dpa. This does not justify the lower housing requirement figure.
11. The 1996-2006 Fylde Local Plan, which was adopted in May 2003, was not only the first borough-wide Local Plan but it did not identify any housing allocations. The defined settlement limits were also drawn in a restrictive manner as the strategic housing requirement over the remaining plan period had already been met by existing commitments. The Council subsequently adopted the 2004-2016 Local Plan Alterations Review in 2005 but this made no housing allocations and instead introduced an effective moratorium on new residential development.
12. The advent of the Regional Spatial Strategy for the North West (RSS) changed the position. The RSS identified a higher annual housing requirement for Fylde between 2003-2021, closer to the level prior to the introduction of the Joint Lancashire Structure Plan (JLSP). The JLSP had reduced Fylde’s annual housing requirement by 45% compared to the previous Structure Plan.

13. Consequently, the adopted Local Plan not only had no housing allocations or strategy in place to deliver the RSS housing requirement, with there being a complete reliance on windfall development, but the defined settlement boundaries had been drawn in a restrictive manner on the basis that new housing was to be strictly regulated. Ever since the publication of the RSS it has been evident that significant edge of settlement greenfield development is required if the Borough's housing needs were to be delivered. This was the clear opinion of the Council's own Planning Policy Team and had been accepted in numerous s.78 appeals.
14. Despite a clear out of date Local Plan and continued failure to deliver the Borough's annual housing requirement, resulting in a continually rising housing shortfall, Fylde continued to refuse large housing developments forcing applicants obtain permission via s.78 appeals. At Appendix 1 is a table showing those sites identified in the Council's housing trajectory (which includes allocations) which had to be granted on appeal, totalling 2,685 dwellings.
15. This has not only delayed development as applicants are forced to go through lengthy appeals, but such a negative approach by the Council will undoubtedly have had a negative impact on the development industry with regards to pursuing opportunities in Fylde. Ultimately the lack of an up-to date Local Plan positively setting out how development requirements are to be delivered, the housing moratorium in earlier years, the restrictive settlement boundaries drawn at a time when no additional housing was deemed necessary, and a general reluctance to support planning applications for greenfield settlement extensions, have all contributed to the average completion rate being below the Council's identified housing requirement.
16. A positive plan identifying development opportunities will have a positive impact on completions and is more likely to substantially boost the supply of new housing in accordance with the NPPF. It is also noted that completions are rising, with 455 completions last year. The Council's own housing trajectory expects an average of 682 completions a year over the next 8 years. It drops off in the latter stages of the plan period as the allocated sites are gradually completed.
17. Without prejudice to the objections to the OAN range, it is considered that the housing requirement figure should at the very least be 432 dpa, i.e. the top end of the Council's suggested OAN range of 408-432 dpa.

18. It is therefore considered that the Council's selection of the 415 dpa Local Plan Housing requirement is not *justified* based on the evidence available and results in the plan not being *positively prepared, effective or consistent with national policy*.

Five Year Housing Supply and the Housing Trajectory

5yr Requirement

19. The Council continue to suggest the Liverpool approach with regards to dealing with past under delivery. It is understood from the Inspector's letter to the Council dated 3/07/17 that the Inspector has already recommended that there is no justifiable basis to apply the Liverpool approach and that the shortfall should be delivered within the first five years of the plan period (Sedgefield approach). The Council now suggest that the Liverpool approach is justified as:
- a) The trajectories in Annex 2 are the best that can presently be achieved regarding delivery of sites and there are no additional sites that are able to deliver in accordance with the development strategy where it has been demonstrated that the broad constraints facing sites within the borough have been addressed satisfactorily.
 - b) Finding sites quickly to make up any deficiency within the 5 years would not be straightforward, recognising that they would likely deliver only 15 units per site, and the impact of the presumption would lead to larger sites being offered that would deliver later and destabilise the strategy, by threatening the delivery of the "*key sites which are critical to the delivery of the housing strategy*" and their associated infrastructure, that principally deliver in the latter part of the plan period.
 - c) PPG paragraph 3-035-20140306 advises that where it is not possible for an LPA to deal with any undersupply within the first five years they will need to work with neighbouring authorities under the duty to co-operate.
 - d) Certain sites in the plan will mainly deliver later in the plan period. The plan allocates sites to provide sufficient dwellings the whole plan period requirement, rather including broad locations for later stages. These strategic sites in the plan, the majority of which have planning permission, therefore provide greater certainty that the backlog will be made up.

- e) In paragraph 3.24 the Council refer to Liverpool Plus, highlighting that a 20% buffer is being applied.
20. With regards to a) and b) above, Metacre are promoting a site for allocation immediately adjoining the strategic location for development to the north of Wesham (allocation HSS8). An outline planning application for 68 dwellings was submitted in December 2016 (ref. 16/1029). With regards to the 'significant hurdles' identified in paragraph 3.16 of the Council's consultation document, there were no objections from the Council Ecologist (GMEU) or Natural England on matters relating to ecology, including impacts on pink-footed geese or the Ribble and Alt Estuaries SPA. There was also no objection from either the Local Highway Authority (Lancashire County Council) or Highways England on highway matters. The land is not BMV agricultural land and there were no technical objections to the grant of permission.
21. The Council refused permission in July 2017 solely on the grounds of landscape and visual impact, which is disputed especially given the relationship of the site with the adjoining strategic location for development and the findings of previous appeal Inspector's relating to matters of landscape impact in this location. Indeed it is noted that the Council are increasingly referring to landscape impact as a reason to refuse planning permission and they have just lost another s.78 appeal (ref. APP/M2325/W/17/3166394) for 50 houses on a greenfield edge of settlement site at Newton with Scales, where landscape impact was given as a reason for refusal. The Inspector concluded that whilst development would result in a modest erosion of landscape character this was restricted to the area relatively close to the site and the defining landscape characteristics of the wider area would not be adversely affected. A s.78 appeal has been lodged against the Council refusal of Metacre's planning application.
22. Ultimately Metacre's promotional site is an example of there being additional sites that are able to deliver in accordance with the development strategy, where the broad constraints facing sites in the Borough have been addressed satisfactorily. It is a site of such a scale that could contribute towards the 5 year supply without 'threatening the delivery of the key sites being delivered in the latter part of the plan period'.
23. With regards to there being sufficient allocated sites to meet the whole plan period and the strategic sites providing greater certainty that the backlog will be made up, it is

demonstrated later in this representation that a number of the Council's identified housing sites may not be deliverable and that the anticipated delivery rate for Queensway (HSS1) is unrealistic. It is therefore disputed that there are sufficient allocated sites to meet the whole plan requirement. Moreover the Council's own housing trajectory shows that from 2025 onwards the anticipated completion rate falls below the basic 415dpa requirement. Accordingly, there is no certainty that the backlog would be made up at later stages of the plan period and for reasons highlighted in the Stage 1 representations the clear steer from National policy is to address the shortfall as quickly as possible.

24. With regards to 'Liverpool Plus', the entire purpose of the 20% buffer is to address persistent under delivery and provide a realistic prospect of achieving the planned supply. There is no dispute by the Council that there has been a persistent under delivery. By applying Liverpool and a 20% buffer the Council are still only aiming to deliver 4,408 houses by 2022 (Council's identified 5yr year requirement with 20% buffer + completions at 2017). This is still 157 dwellings less than the Plan requirement by 2022 (415 dpa x 11 years = 4,565 dwellings). In no way can this be seen to reflect the clear NPPF and NPPG requirement to deliver the full objectively assessed needs for market and affordable housing, address the housing shortfall as quickly as possible and within the first five years of the plan period where possible, and moreover to provide a buffer of housing land to provide a realistic prospect of achieving the planned supply.
25. It is therefore considered that Sedgefield is the correct approach to delivering the housing shortfall and there is simply no justification for the Liverpool approach. Metacre concurs that the five year requirement figure contained in table 1 in Annex 2 of the Council's consultation document, which is based on Sedgefield, is correct assuming a 415 dpa basic requirement (3,632 requirement or 726 dpa). However, if the Local Plan requirement were 432dpa, i.e. the top of the OAN range, the five year requirement would be 3,857 dwellings (771 dpa). This is without any further adjustments as a result of related objections to the OAN range itself.

Housing requirement 2011-2017 @ 432 dpa = 2,592

Housing shortfall at 2017 (2,592 – 1,538 completions) = 1,054

5 yr requirement with shortfall (5yr x 432dpa + 1,054) = 3,214

Plus 20% buffer = 3,857 dwellings (771 dpa)

5 yr deliverable supply

26. Firstly, if the Council's Plan requirement reflected the upper end of the OAN range as suggested by their own consultants, even the Council's alleged deliverable supply of 3,677 dwellings would only equate to a 4.7 year supply (180 dwelling shortfall).
27. Secondly, it is disputed that the deliverable supply is as high as 3,677 dwellings.
28. The Council's supply includes 50 dwellings from the Elswick Neighbourhood Development Plan (NDP). The Council refer to planning permissions having been granted in regard to a number of housing sites in the village (both small and large sites) ahead of the production of the NDP. At the previous Hearings the Council confirmed that these permissions were in addition to the 50 dwelling allocation in the trajectory and are indeed already counted elsewhere in the supply. If the NDP has yet to be produced and there are no allocations in the Local Plan and no planning permissions for these additional 50 dwellings, there is no basis to include this allowance in the five year supply. It simply fails the NPPF test of deliverability and these 50 dwellings should be removed.
29. The supply includes a 50 dwelling allowance from long term empty properties. PPG confirms that for an empty homes allowance to be justified the Council must have an Empty Homes Strategy and present robust evidence at the Local Plan examination. Metacre are unaware of any robust evidence being provided at this Local Plan Examination to justify this allowance.
30. The supply includes an 80 dwelling allowance from small windfall sites. The Council states in Annex 2 that this is based on an analysis of previous planning permissions coming forward. However there has been no up-to-date adopted Plan, nor a five year housing supply for a decade. Accordingly there will undoubtedly have been a large number of small windfall sites approved over this period which may not necessarily be approved in the context of an adopted Plan. This is particularly the case given the relatively short supply of previously developed land in the Borough and the tightly drawn settlement boundaries. In this context the historical windfall delivery rate is not a robust means of forecasting realistic windfall delivery going forward. Under the terms of NPPF 48 Local planning authorities may only make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites will continue to

provide a reliable source of supply. This is not considered to be the case thus these 80 dwellings should be discounted from the supply.

31. In addition to the above, Metacre have concerns regarding the delivery or delivery rate of the following sites in the Council supply.

Queensway, St Annes (HSS1)

32. It is understood that this site is being developed by a single developer (Kensington Developments Ltd). Bearing in mind that this is also a large strategic site (1,150 dwellings) the suggested delivery rate of 100 dpa continuously for a 12 year period is unrealistic. No other developer in the Borough has indicated delivery rates near this level and even the Council were suggesting at previous Hearings a delivery rate of 60 dpa. This does not just have an implication on the five year housing supply but also the delivery of the whole Plan requirement. For example a drop in the delivery rate to the previously indicated 60dpa would remove 140 dwellings from the five year supply and 340 from the supply for the entire plan period.

Jubilee House, Lytham (HS2)

33. This site is an operational business park, the residential permission (13/0001) expired in August 2016 and since the permission the owners have sought planning permission for the erection of a sign displaying the occupants of the offices (ref. 14/0762) and more recently have submitted an application to allow a coffee shop to be open up to members of the public (17/0747). This suggests that the site is not 'available now' and the owner does not intend to seek the residential redevelopment of this site in the near future. The site does not therefore meet the NPPF tests of deliverability and these 20 dwellings should be removed from the supply.

Fairways, St Annes (HS12)

34. PPG confirms that when considering is a site is 'available now', which is a key requirement of being deliverable (NPPF 47 footnote 11), consideration should be given to matters such as the delivery record of the developers or landowners putting the site forward and whether the planning background of a site shows a history of unimplemented permissions. Ultimately to be included in the five year supply there has to be a realistic prospect that the site will be delivered. Fylde DC Committee resolved to grant outline planning permission subject to a s.106 agreement over 9 years ago in 2008 (08/0092). The Council's web site indicates that there is still no completed s.106

and thus no planning permission. The site (20 dwellings) should not therefore be included in the five year supply.

Kingsway Garage, St Annes (HS13)

35. Fylde DC Committee resolved to grant outline planning permission subject to a s.106 Agreement 5 years ago in October 2012 (11/0667). The Council's web site indicates that there is still no completed s.106 and thus no planning permission. The site (30 dwellings) should not therefore be included in the five year supply for similar reasons to site HS12.

Blackfield End, Farm (HSS2)

36. There is only one developer on this site yet the Council are suggesting a delivery rate of 50dpa. A 30dpa delivery rate for a single developer is considered more realistic, which would reduce the supply by 70 dwellings.

Oaklands Caravan Park, Warton (HS27)

37. This site is still in active use as a caravan park and so the site cannot be considered as "available now" and fails the test of deliverability. It should be removed from the five year supply (53 dwellings).

Pennine View, Wesham (HS30)

38. This site has a history of unimplemented planning permissions such as 10/0307 which obtained a resolution to approve subject to a s.106 which the applicant failed to sign. The latest application obtained outline approval in September 2013 (13/0364) which expired in September 2016. This suggests that there are constraints preventing this site from being brought forward and it should be removed from the five year supply on similar grounds to HS12 (12 dwellings).

Land North of North View Farm, Wrea Green (HS47)

39. As previously highlighted PPG confirms that when considering is deliverable consideration should be given to matters such as whether the planning background of a site shows a history of unimplemented permissions. This site has been the subject of six applications over a four year period. It should therefore be removed from the five year supply (15 dwellings).

Singleton Village (HS53)

40. An outline application for 15 dwellings (14/0652) was submitted over 2½ years ago but according to the Council's web site this was withdrawn and there have been no resubmissions. This indicates constraints to the site being brought forward and it should be removed from the five year supply on similar grounds to site HS12 (15 dwellings).
41. Taking all of the above into account the Council's deliverable supply is reduced by 555 dwellings to 3,122 dwellings.
42. Assuming Sedgefield and based on the Council's suggested 415 dpa Plan requirement this supply would equate to a 4.3yr supply. Based on 432dpa plan requirement it would equate to a 4 yr supply.
43. Furthermore, if Queensway were only to deliver 60 dpa rather than 100dpa (as was previously the Council's position) and the above sites with deliverability questions are excluded from the overall plan supply together with the windfall and empty homes allowance, the overall supply for the remaining Plan period drops to 6,250 dwellings. This is substantially below both the residual requirement based on a 432dpa requirement (7,534) and based on the Council's suggested 415dpa requirement (7,177 residual requirement)
44. Bearing in mind there are also no identified broad locations for development, the Plan would not meet the NPPF 14 requirements for Local Plans to positively seek opportunities to meet the development needs of their area and to be able to meet objectively assessed needs with sufficient flexibility to adapt to rapid change. Additional sites need to be allocated in the Plan for it to be found sound.

APPENDIX 1

Local Plan Ref.	Site	No. of dwellings	Comments
HS21	11-63 Westgate Road	70	Approved on appeal. Subject application had an officer recommendation for approval.
HS29	Crossacres, Wesham	106	Original outline permission approved on appeal following non-determination by Council
HSS1	Land south of Queensway	1,150	Outline permission originally approved on appeal following Council's non-determination.
HSS2	Blackfield End Farm, Warton	360	Approved on appeal following Council's non-determination.
HSS7	Land at Brookfarm, Dowbridge	170	Outline approval 15/0547 granted on appeal.
HSS8	The Pastures, Wesham	262	Granted on appeal. Subject application had officer recommendation for approval.
HSS9	Land north of blackpool road, Kirkham	117	Granted on appeal
HSS9	Land north of Blackpool Road, Kirkham	180	Granted on appeal after Council's non-determination
HSS11	Willow Drive, Wrea Green	100	Granted on appeal
HSS13	Clifton House Farm, Lytham Road, Warton	115	Outline approval 15/0562 granted on appeal.
HS45	54 Bryning Lane, Wrea Green	25	Granted on appeal. Subject application had recommendation for approval.
HS40	Kings Close, Staining	30	Granted on appeal. Subject application had recommendation for approval.
	Total	2,685	

Fylde Council: Fylde Local Plan to 2032

Consultation on Additional Evidence in Support of the Local Plan

Submission for and on behalf of Metacre Ltd.

14th September 2017

Introduction

1. This submission is made for and on behalf of Metacre Ltd. concerning the *Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032* (August 2017) (the 'Additional Evidence').
2. The submission should be read together with Metacre's previous representations and submissions to Fylde Council and to the Local Plan Examination hearings.

Background Context to this Representation

3. Metacre has previously made representations and objections to the Fylde Local Plan both during the draft plan preparation stage and more recently at the Local Plan Examination in Public hearings (EiP) where Metacre presented evidence to the appointed Planning Inspector on duty to co-operate, objectively assessed housing needs, housing land supply and economic development matters.
4. During the Local Plan EiP hearings there was significant evidence and debate concerning the assessment of future housing requirements and related matters including economic and employment growth. The Council was requested by the Local Plan Inspector (letter of 3rd July 2017 - **EL5.014**) to prepare new evidence to answer concerns and queries on housing and economic development matters and to justify the approach and conclusions reached by the Council in setting the Local Plan's planned housing requirement.

5. The Council subsequently published an extensive suite of new demographic, economic and housing supply evidence in response to the Inspector's request and this new evidence is the subject of this consultation response by Metacre.
6. Before proceeding to set out Metacre's significant objections to the new published evidence it is important to record our client's concerns and indeed irritation that at this stage in the Plan-making process, part-way through public examination, it has been necessary to publish such a substantial volume of new analysis and assessment evidence work. The fact that this has had to be undertaken by the Council serves to underline simply how deficient, incomplete and unreliable the earlier evidence was. It is clearly frustrating to Metacre that earlier, detailed analysis, critique and consideration of the Local Plan and its evidence base has been largely abortive and now superseded work.
7. At this stage, it remains unclear how the Council will utilise the findings of the current consultation on this new evidence and the extent to which the Local Plan can therefore be modified.
8. In such circumstances Metacre anticipate and indeed expect, as a matter of process and effective engagement that the Local Plan Inspector will re-examine matters of objectively assessed needs, economic growth and housing land supply through further hearing sessions to be arranged, before concluding whether modifications to the Local Plan are necessary and consulting on those.

Response

9. Metacre's detailed consultation response is structured as follows:
 - the calculation of the OAN and affordable housing;
 - assessment of employment growth;
 - the overall housing requirement and the housing need/economic balance.

Calculation of the OAN

10. Updated analysis of Fylde's objectively assessed housing needs (OAN) is set out in Annex 1 of the *Additional Evidence Consultation* documents. The work is contained in Appendix 1 to Annex 1 and is a report prepared by Turley known as *Fylde Addendum 3: Analysis of the OAN in Light of the 2014-based SNPP and SNHP* (May 2017).
11. Metacre welcome the assessment of the potential population and household growth with regard to the latest 2014-based Sub-National Population Projections (SNPP) and Sub-National Household Projections (SNHP) which represent the 'starting point for assessment in accordance with the NPPG (2a 015).
12. This analysis should and could have been undertaken at a far earlier point in the plan-preparation process and certainly prior to the start of the Local Plan EiP rather than waiting until the EiP hearings were underway and only then in response to a direct request from the Local Plan Inspector.

The Demographic Starting Point and Adjustments

13. Annex 1 at paragraph 5.1.2 refers to the findings of the *Fylde Addendum 3* report noting that the 2014-based SNHP 'starting point' projection is **274** dwellings per annum (dpa) and that this is higher than the previous Addendum 2 analysis that concluded a starting point of **237** dpa.
14. It is noted that the *Addendum 3* report identifies an adjusted headship rate calculation applied to the 2014-based SNHP (similar to that applied to the previous SHMA and two addenda reports). Table 3.2 indicates that using an adjusted headship rate return (effectively an adjustment to ensure younger household formation rates return to the levels evidenced in 2001) results in a base demographic 'starting point' of **283** dpa rather than **274** dpa.
15. It is noted that the Council's Annex 1 report at Section 5 does not report or record that there is an adjusted headship rate return 'starting point'; and it is unclear at paragraph 5.1.2 why this figure was not reported or used as the OAN

starting point given the basis of its calculation is the same as for the previous SHMA and Addenda.

16. Paragraph 3.33 of Addendum 3 concludes, rightly, that this adjustment evidently results in an uplift in the need for dwellings; and paragraph 3.38 confirms that:

“This provides a positive response to the assumed reduction in younger household formation within the 2014-based SNHP, which is considered at least partially associated with the worsening affordability and historic undersupply of housing in the borough. This adjustment is methodologically consistent to that used in Addendum 2, and has been used in the projections modelled by Edge Analytics in the Economic Modelling Briefing Paper (EL2.025b (ii)) and the Demographic Projections Update Paper (EL1.011)”.

17. Metacre agree that the adjusted headship rate return modelled over a 12 year historic trend period represents an appropriate approach to establishing the minimum demographic assessed need which is consistent to the approach previous adopted. This results in a demographic need of **351** dpa that is below the **370** dpa modelled previously in *SHMA Addendum 2*.

Employment Growth

18. The new OAN range set out in *Addendum 3* includes analysis of future employment growth prospects derived from work undertaken by Amion for the Council and set out in the *Independent Assessment of the Economic Prospects of Fylde* (May 2017) included within Annex 1 of the Additional Evidence consultation.
19. *Addendum 3* relies entirely on the *Independent Economic Assessment* for the inputs to employment-led household growth scenarios and it is therefore important to understand and consider how and what conclusions this report makes in more detail.

20. The *Independent Economic Assessment* concludes at paragraph 2.9 that there is a future range of job growth between **+55** and **+91** jpa (equating to around **900 – 1,500** jobs for the Borough over the remainder of the plan period. At paragraph 2.10 the report Assessment is clear that job creation is likely to be at the upper end of the range.
21. The *Independent Economic Assessment* concludes that the average of the three economic forecasting house employment forecasts should be used. This indicates a total increase of **1,548** jobs in Fylde between 2015 and 2032 in a ‘policy-off’ context. This equates to approximately **91** jobs per annum. This is, in Metacre’s view, a reasonable approach to adopt and provides a balanced, if **minimum**, employment growth forecast, and is an approach applied in other studies and supported by Inspectors.
22. Metacre are however concerned that the Assessment then suggests using a three-year moving average of employment change as an additional way to derive an employment growth forecast. However, this introduces greater uncertainty to the assessment, and risks suggesting a spurious level of accuracy, with averages of averages. It also uses 2014 as a reference base for the analysis which had a particularly high employment level – rather than 2015, which is the start of the Plan period – with the effect of reducing the overall employment growth forecast to **55** jobs per annum.
23. Given the standard use of average employment growth across a range of forecasts as means of assessing employment change, the **91** jobs per annum figure derived for Fylde should be seen as the **minimum** figure.
24. Turning to the Enterprise Zones, no adjustment has been made to the proposed OAN with respect to employment generation from the two Zones according to paragraph 4.4 of Annex 1 at p.35. Indeed, the Enterprise Zones are considered as ‘policy on’ and therefore discounted from the *Independent Economic Assessment* according to paragraph 2.11.
25. However, the Enterprise Zones are both real, operational and growing now. They should not be considered as a theoretical ‘policy-on’ position and their

current and future contribution to employment growth needs to be assessed now with the implications for the OAN accounted for.

26. In this respect, **Appendix A** of this submission by Metacre includes a more detailed analysis and review of the employment prospects arising from the Enterprise Zones. It concludes (paragraph references to the analysis in brackets) that:

- the Blackpool Airport Enterprise Zone (BAEZ) has the principal, key driver of job creation and industry diversification (paragraph 3.15);
- there has been considerable interest and take-up of space during the first year of operation over **200** businesses employing **1,500** people have occupied space at BAEZ, of which **28** are new companies creating **450** new jobs (paragraph 3.16); new jobs created to date equate to **15%** of its target ambition of **3,000** new jobs by 2030 (paragraph 3.19);
- the employment potential of the BAEZ (like the Lancashire Enterprise Zone) is being delivered, faster than average and so needs to be properly incorporated into the assessment of realistic employment growth in Fylde over the Local Plan period (paragraph 3.20);
- the Lancashire Enterprise Zone (LEZ) was established with the intention not to displace existing companies already located in Lancashire (paragraph 3.5). The LEZ Enterprise Governance committee will assess each proposed development to ensure that displacement does not occur (paragraph 3.6);
- there is strong formal support for the EZs from Lancashire LEP (LLEP) and Fylde Borough Council, as well as expectations from central Government as part of the approval and funding support for the EZ (as summarised in paragraphs 3.8 – 3.12);
- calculation of potential future jobs arising in the EZ's has been undertaken, resulting in a range of **+41** to **+79** jobs per annum above the base **91** jpa set out in the *Independent Economic Assessment*. This is equivalent of **697** - **1,338** new jobs in Fylde over the period 2015-2032 in addition to those new jobs elsewhere in the Borough (paragraph 3.35).

27. The time, planning, commitment and resources that have gone into the development, set-up and operation of the EZs, as well as agreement with and commitment to central Government in order to secure approval and funding, indicates a serious intent to make the EZs a success.
28. Despite this, the conclusion drawn from the *Independent Economic Assessment* is to effectively say that there will be no jobs arising from the EZs. As evidence from the first year of operation of the BAEZ has demonstrated, this is clearly not the case.
29. The Council indicate at paragraph 2.18 of the *Additional Evidence Consultation* that a 'planning judgement' has been taken to the effect that there is high degree of EZ job creation uncertainty and therefore not sufficient evidence to make an adjustment for economic growth arising from the Enterprise Zones. A 'monitor and manage' approach is therefore proposed with no adjustment to the OAN arising now.
30. While it is understood that there may be a degree of uncertainty in projecting future job creation arising from the Enterprise Zones it is not considered appropriate or indeed positive, effective planning to fail to take any account of the two Zones in assessing economic and employment growth or the implications or the Borough's OAN.
31. It is recognised by Metacre that there will always be uncertainties in the assessment of employment associated with the EZs, as it is for the underlying baseline employment projections provided by the economic forecasting houses. However, this is not in itself a reason for avoiding such an assessment.
32. Understanding the likely level of **additional** employment that may arise in Fylde over the next 20 years is critical to ensuring adequate provision to support such growth is in place. If it assumed that such an assessment is too uncertain or too complex, then it undermines the identification of a realistic OAN for the borough and represents a dereliction of responsibility and commitment to positive, proactive and effective planning.

33. Without such assessment and inclusion of realistic economic and employment growth information arising from the two existing Enterprise Zones, the proposed OAN and its supporting evidence are not justified or effective.

Affordable Housing

34. The *Addendum 3* report includes a recap of previous evidence on affordable housing from earlier SHMA and Addenda. It concludes that there is no change to the previously established level of affordable housing at **247** dpa (SHMA Addendum 1, **ED022**). At paragraph 6.43 of *Addendum 3* it confirms that to meet affordable housing needs in full would require the OAN to be **800** dpa and then indicates that it would not be realistic to achieve this level of development.
35. Metacre has previously submitted evidence to the Local Plan EiP with respect to the provision of affordable housing and the implications of this for the OAN (Metacre's submission to Matter 2 of the EiP hearings refers).
36. Metacre's critical concern is that the proposed OAN range of **408 – 432** dpa as set out in *Addendum 3* will not meet even half of the annual level of affordable housing needs (the Addendum estimates some **120 – 130** affordable dwellings per annum set against the target need of at least **247** dpa). This issue is compounded when considered in light of the evidence of worsening affordability of housing in Fylde as set out in *Addendum 3* at, *inter alia*: Tables 5.1, 5.2, 5.3 and Figure 5.4. The *Addendum 3* report concludes that affordability has worsened and continues to increase to circa **6.5 : 1** house price to earnings ratio.
37. With worsening affordability and therefore access to market housing there will be inevitable additional pressure on affordable housing need and demand. The Local Plan, through the identification of an appropriate OAN figure needs therefore to do far more to secure affordable housing development than would be generated by the **415** dpa OAN proposed.
38. In short, Metacre consider it appropriate for the OAN to be subject to further upward adjustment to ensure the greater delivery of affordable housing in order

to better meet evidenced needs. The OAN figure proposed by the Council in the *Additional Evidence Consultation* is therefore deficient.

Market Signals

39. The NPPG advises that housing needs identified through household projections may need to be adjusted to reflect market signals and indicators of the balance of supply and demand. In Section 2a at paragraph 020 the NPPG confirms that comparative indicators should be made considering longer term trends for the district, the Housing Market Area and nationally.
40. Where there are worsening trends indicated by negative market signals and /or worsening affordability then an upward adjustment to planned housing numbers should be made. The NPPG does not identify how such an adjustment should be made, simply that it is reasonable.
41. The *Report to the Communities Secretary and to the Minister of Housing and Planning* (March 2016) by the Local Plans Expert Group (LPEG) did however look at the issue of adjustments to OAN for market signals in more detail and offers recommended adjustments in Appendix 6 of the report.
42. Metacre welcome the analysis presented in *Addendum 3* that summarises recent housing market signals. The assessment of market signals clearly shows that mean and lower quartile (LQ) sales prices have increased substantially over the period 2001 – 2016 and that Fylde has witnessed the largest overall change compared to other areas within the HMA and its surroundings (Tables 5.1 and 5.2 of *Addendum 3*).
43. The affordability ratio has also increased to **6.5** in 2016 from **3.57** in 2001 (as Table 3 and Figure 5.4 of the *Addendum 3* shows). This key ratio has clearly worsened and particularly so for LQ households.
44. *Addendum 3* therefore rightly concludes that housing affordability is worsening and suggests a 10% uplift adjustment to the demographic projection of housing need to account for this at paragraph 5.4.4.

45. Metacre's view is that the key housing affordability signals have been and remain of serious concern for Fylde. An adjustment of **10%** is supported but it should be at a higher level in order to deal with the fundamental failure to deliver sufficient housing in the Borough which has resulted in worsening affordability ratios and an acute, sustained level of affordable housing need as well.
46. LPEG guidance suggests that where the affordability ratio is above **5.3** but below **7.0** then a **10%** uplift is appropriate, with a **20%** uplift where affordability is worse than **7.0**. In this case, it is clear that the affordability ratio is currently **6.5** and that it has typically been at this level or over **7.0** in the period from 2006 (as Figure 5.4 of *Addendum 3* identifies). It would appear reasonable to deal with this persistent and acute concern by way of a larger upward adjustment of **20%** to the OAN figure.

Overall Housing Requirement and Economic Needs

47. Paragraphs 2.19 and 2.20 of the *Additional Evidence Consultation* sets out the Council's approach and conclusion on balancing housing needs and economic growth.
48. Notwithstanding Metacre's significant concerns with regard to the proposed OAN range and particularly the serious under-estimate of future economic and employment growth conclusions drawn in the *Independent Economic Assessment*, it is unclear how Fylde Council has actually determined that the OAN figure should be **415** dpa from the revised range of **408 – 432** dpa recommended in Table 6.1 of *Addendum 3*.
49. Despite the clear recommendation and advice in *Addendum 3*, the Council has selected **415** dpa OAN as paragraph 2.20 of the *Additional Evidence Consultation* document records. This is at the low end of the proposed range and (even setting aside the concerns raised about the overall OAN range) does not represent a positive or proactive planning response to resolving long-term housing requirements, improving the economic sustainability of the Borough

(from being a net workforce importer) or helping meet fundamental, acute and worsening affordability issues.

50. Paragraph 2.4 of the *Additional Evidence Consultation* document refers to taking a planning judgement in order to reach the **415** dpa OAN figure. The Consultation document does not however justify fully why this is the appropriate point within the proposed range to pick. At paragraph 2.22 the Council points to two factors in reaching its conclusion:

- the reasoning set out in Annex 1 (the *Addendum 3* and *Independent Economic Assessment* evidence); and
- that the proposed housing requirement of 415 dpa “*represents a step change in historic housing delivery and affordable housing delivery*”.

51. Each point is considered in turn below.

Reasoning in Annex 1

52. It is noted at paragraph 2.20 that planning for the provision of **415** dpa would provide “*significant headroom*” above the demographic need, but it is abundantly clear that the *SHMA Addendum 3* report concludes an OAN range of **408 – 432** dpa at Table 6.1 with the recommendation at paragraph 6.38 of that Report that the selected OAN should be at the higher end of the range:

“Whilst a range of OAN for housing has been concluded – associated with the range of job growth considered reasonable within the Independent Economic Assessment – it is recognised that this report concludes that it is ‘expected...that the likely level of employment growth will be at the upper end of this range’. It is therefore considered that the full need for housing will be more closely aligned with the upper end of the identified OAN range”. [Our emphasis].

53. The selection of an OAN at the top of the range is also supported by *Addendum 3*’s statement at paragraph 6.47 that worsening affordability and the need to

deliver more affordable housing would also support the selection of an OAN at the high end of the range:

“It is considered, however, that in the context of a recognised significant need for affordable housing that this provides further support for placing greater emphasis on the upper end of the OAN range”.

Step Change in Delivery

54. *Addendum 3* concludes that the OAN would lead to an approximate doubling of the historic rate of development (210 net dpa 2003 – 2016); but this fails to account for the fact that delivery in the past has been suppressed by the failure to provide a Local Plan with sufficient and available housing land allocations.
55. Metacre raised concerns on the artificial suppression of housing delivery rates in their Local Plan EiP Hearings Matter 1 submission (paragraph 42 onwards refers). In summary, Metacre concluded that:
- the 1996-2006 Fylde Local Plan, which was adopted in May 2003, did not identify any housing allocations and the defined settlement limits were drawn in a restrictive manner, as the strategic housing requirement over the remaining plan period had already been met by existing commitments. The Council subsequently adopted the 2004-2016 *Local Plan Alterations Review*, which introduced an effective moratorium on new residential development;
 - the adopted Local Plan not only had no housing allocations or strategy in place to deliver the RSS housing requirement, with there being a complete reliance on windfall development, but the defined settlement boundaries had been drawn in a restrictive manner on the basis that new housing was to be strictly regulated;
 - since the publication of the RSS it has been evident that significant edge of settlement greenfield development is required if the Borough’s housing needs were to be delivered;

- the Council have been acutely aware of the need to update their Local Plan, having published a *Local Development Scheme* in March 2007 suggesting that the production of a Core Strategy would commence in July 2007 and a *Site Allocations Policies DPD* in July 2008 (Appendix 4);
 - the production of this replacement Development Plan has been incredibly slow given this commitment 10 years ago. This is despite having an adopted Local Plan which provides no strategy to deliver housing requirements, which is entirely reliant on windfall developments and has settlement boundaries drawn in a manner to restrict new development. This is also despite a continued failure to deliver the Borough's annual housing requirement, resulting in a continually rising housing shortfall.
56. It is therefore clear that the failure to plan effectively for sufficient housing sites and land has, over a significant time period, been a substantive reason why historic delivery rates are lower than the OAN levels now anticipated. The comparison of historic delivery rates with the proposed OAN is not therefore, in Metacre's view, a realistic justification for setting the figure at **415** dpa. The provision of sufficient land and sites over time would have resulted in a higher average annual completion and delivery rate than that achieved. Comparison of the proposed OAN with the achieved development rate is artificial.
57. At paragraph 2.22 the Council considers that the difference between **415** dpa and the top of the proposed OAN range is 15 dpa and that this represents:
- "a difference of only 3.6% of total housing supply over the plan period, which represents a very minor deviation in the context of the inexact nature of forecasting".*
58. Metacre takes a different view. There is no real, specific justification for a **415** dpa OAN rather than a figure at the high end of the OAN range (again setting aside in this instance Metacre's concerns over the OAN range itself and the failure to properly assess employment growth). The Council's approach, would over the 21 year plan period 2011 – 2032 would result in potentially some **315** dwellings less than if the OAN was at the top of the range (in accordance with

the *Addendum 3* recommendations). Metacre consider that this is not consistent with the NPPF at paragraph 47 which seeks a significant boost to the housing supply, nor is it a sufficiently positive or proactive approach to ensure housing needs are met. The Council's selected OAN is not therefore consistent with national policy.

Unmet Housing Needs – Wyre District

59. Metacre note, with concern that there is no new evidence or analysis published for consultation concerning the potential unmet housing needs arising from Wyre District. This is a significant concern given the extended discussion arising at the Local Plan EiP hearing sessions and the Council's confirmation that they were working proactively with Wyre in accordance with the Duty to Co-operate.
60. Metacre consider that it is not appropriate to settle the OAN for the Borough until there is a final, settled position reached between the Borough and Wyre concerning the level of any unmet housing needs that would need to be accommodated within the Borough. Metacre therefore reserve the right to submit additional representations with regard to this matter in due course.

Sustainability Appraisal

61. Any changes to the Local Plan policies will need to be appraised in terms of Sustainability Appraisal and Habitats Regulations Appraisal.
62. This has not been undertaken as part of the current consultation and it is not therefore possible to understand, review or examine changes to Local Plan policies concerning housing requirements, site allocations or economic growth in terms of their sustainability. Metacre therefore reserves the right to comment on the sustainability implications arising from any changes to proposed Local Plan policies in due course.



Chilmark Consulting Ltd.

T: 0330 223 1510

E: planning@chilmarkconsulting.co.uk

www.chilmarkconsulting.co.uk



METACRE LTD.

Fylde Local Plan to 2032

Economic Growth Opportunities Analysis

Appendix A to Metacre Additional Evidence
Consultation

Date: September 2017

Chilmark Consulting Ltd

T: 0330 223 1510

E: info@chilmarkconsulting.co.uk

chilmarkconsulting.co.uk

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1. INTRODUCTION

Overview

- 1.1 Chilmark Consulting Ltd. (CCL) was commissioned in August 2017 by Metacre Ltd. to provide a review of the economic position offered by Fylde Borough Council in relation to employment growth projections in the Borough. This is on the basis of concerns raised at the Local Plan Examination in Public (EiP) that the economic position adopted by the Council was unduly pessimistic.
- 1.2 The key focus of the work has been on the employment growth opportunities offered by the two Enterprise Zones (EZ) in and adjacent to Fylde. This is to ensure that a realistic assessment of the employment potential that these EZs may offer is provided.

Approach

- 1.3 The key elements of the approach adopted in the study are as follow:
 - **Baseline Economic Review:** A focussed review of the '*Independent Assessment of Economic Prospects of Fylde*' (May 2017) study (the Amion Report) to examine the robustness of assumptions used, reliability of data, and implications for growth scenarios and findings; and
 - **Enterprise Zone Employment Potential:** An assessment of the realistic potential employment levels associated with the two EZs, and the potential employment retention of these jobs in Fylde.
- 1.4 This Report contains the results of the above activities.

2. BASELINE ECONOMIC REVIEW

Introduction

- 2.1 Fylde Borough Council commissioned Amion Consulting to provide an independent assessment of the economic prospects for Fylde. A report of findings was produced in May 2017 in the '*Independent Assessment of Economic Prospects of Fylde*' report. This report provided an assessment of historical economic performance in the Borough, a review of economic forecasts and an analysis of labour market conditions.

Key Findings

- 2.2 The historical assessment was based on examining a combination of employment change figures from economic forecasting houses (Cambridge Econometrics, Experian and Oxford Economics) and data from the Business Register and Employment Survey (BRES). It was noted that the BRES data under-records employment as it does not take account of self-employed people not registered for VAT or PAYE, HM Forces or government trainees, which helps explain the differences with the employment data from the economic forecasting houses. There are also differences in how the economic forecasting houses model their employment projections, which gives rise to variation in results between them.
- 2.3 The key findings from the period 2009-2015 are an average employment growth rate of **114** jobs per annum using the average of the three economic forecasting houses data, compared with **30** jobs per annum using BRES data. For the period 2011-2015 the figures are **913** and **700** jobs per annum respectively, reflecting the improved economic position post the 2007-8 global recession.
- 2.4 Overall, the historical employment assessment provides a clear explanation of patterns of change and some of the reasons driving this change. The Report also highlights the variability between forecasts, and adopts an average of the three sets of forecasts as a reference point. Even so, all the employment forecasts note the improved economic position post-2011 resulting in increased employment growth: from an average of **114** jobs per annum between 2009 and 2015 to **913** jobs per annum between 2011 and 2015.
- 2.5 The employment projections from the economic forecasting houses for the period 2015-32 also show variability, reflecting the differences between their modelling processes. Even so, all show an improving employment position relative to the long-term historical average for the period 1991-2015.
- 2.6 Amion also goes on to note that the economic forecasting house employment projections are a reasonable basis for understanding the 'policy-off' position in Fylde. Thus:

“Overall, the three forecasts are all considered to be up-to-date and produced using established forecasting models that reflect the latest available position in terms of employment growth.”

2.7 The Report continues:

“There is no evident basis on which to presume that any of the employment forecasts is likely to be the most accurate.”¹

2.8 Based on this, Amion conclude that the average of the three economic forecasting house employment forecasts should be used. This indicates a total increase of **1,548** jobs in Fylde between 2015 and 2032 in a ‘policy-off’ context. This equates to approximately **91** jobs per annum. This is a reasonable approach to adopt and provides a balanced, if minimum, employment growth forecast, and is an approach applied in other studies and supported by Inspectors.

2.9 The Amion Report then goes on to suggest using a three-year moving average of employment change as an additional way to derive an employment growth forecast. However, this introduces greater uncertainty to the assessment, and risks suggesting a spurious level of accuracy, with averages of averages. It also uses 2014 as a reference base for the analysis which had a particularly high employment level – rather than 2015, which is the start of the Plan period -with the effect of reducing the overall employment growth forecast to **55** jobs per annum. Given the standard use of average employment growth across a range of forecasts as means of assessing employment change, the **91** jobs per annum figure derived for Fylde should be seen as the minimum figure.

2.10 Critically, however, the Amion Report does not make a reasoned assessment of the potential employment growth that may arise from the two Enterprise Zones within Fylde - the Warton site of the Lancashire Enterprise Zone (LEZ) and Blackpool Airport Enterprise Zone (BAEZ), even though the significance of these developments is acknowledged:

“Of particular relevance to this study, for example, are the creation of the Enterprise Zones at Blackpool Airport and Warton. Within the Borough’s Economic Strategy and the Blackpool Fylde and Wyre Economic Development Company’s ‘Framework for Inclusive Growth and Prosperity’, the Enterprise Zone at Blackpool Airport and Warton are identified as drivers of economic growth and job creation.”²

2.11 Based upon this, Fylde Borough Council conclude that the employment growth that is likely to arise from the two Enterprises Zones should be ignored, thus:

“.. the Council has given considerable weight to the recommendations from the Independent Economic Assessment that the Enterprise Zones at

¹ Independent Assessment of the Economic Prospects of Fylde (May 2017). Section 3.4, page 152-153

² Independent Assessment of the Economic Prospects of Fylde (May 2017). Section 2.4, page 144

Blackpool Airport and Warton are expected to lead to the creation of new employment opportunities in Fylde over the Plan period. There remains though a high degree of uncertainty in terms of the timing, scale and additionality of this impact and it is not considered there is yet sufficient evidence to make a specific adjustment to the baseline forecasts.”³

- 2.12 This is unreasonable and inappropriate given the relevance and importance of these defined Zones and their raison d’etre to create new employment growth opportunities.
- 2.13 Accordingly, the next section provides a reasoned and robust assessment of the minimum additional employment growth that should be incorporated into the assessment of employment change in Fylde based upon the two Enterprise Zones within Fylde.

³ Fylde Council (August 2017) Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032. Paragraph 2.18, page 10.

3. ENTERPRISE ZONE EMPLOYMENT POTENTIAL

Introduction

- 3.1 This section examines the realistic employment potential of the two Enterprise Zones (EZ) within or immediately bordering Fylde Borough. These are the Lancashire Enterprise Zone (LEZ - split into the Warton site and the Salmesbury site) and Blackpool Airport Enterprise Zone (BAEZ).
- 3.2 The potential employment impacts of the LEZ Salmesbury site and the Hillside International Business Park EZ, located near Thornton, are not directly assessed here, although there are likely to be employment impacts from these sites on Fylde Borough. Instead, the focus has been upon the two principal EZ sites within Fylde Borough (LEZ Warton site and BAEZ) in order to provide a cautious assessment of employment impacts. As such, the results outlined here should be seen as minimum realistic employment growth figures for Fylde.

Background

Lancashire Enterprise Zone (LEZ)

- 3.3 The LEZ was established in 2011, and is split across two sites in the county: Warton in Fylde Borough and Salmesbury to the east of Preston in Ribble Valley District. The Warton site is approximately 74.5 hectares (split into a North EZ of 39.7 hectares, South East EZ of 21.3 hectares, and South West EZ of 13.5 hectares⁴) and the Salmesbury site is approximately 75 hectares. They are the operational locations of BAE Systems.
- 3.4 The EZ is managed and coordinated by the Lancashire Local Enterprise Partnership (LLEP). They operate through an Enterprise Governance Committee in association with landowner BAE Systems. The primary focus of the EZ is to form a centre of excellence for high technology manufacturing and engineering, and attract organisations directly involved in the industry or those providing support services.
- 3.5 The EZ is designed to support genuine additional growth, by creating new businesses and new jobs. This is reinforced in the Fylde Council *Local Development Order No1* (2015), which states at paragraph 2.4 in the context of the Warton site:

"It is not the intention of the Enterprise Zone to displace existing companies that are already located in Lancashire".

- 3.6 In order to reinforce the above purpose of the EZ, occupancy of the site is restricted. Thus, as the *Lancashire Advanced Engineering & Manufacturing Enterprise Zone Consultation Masterplan Salmesbury Site* (October 2013) states at paragraph 1.1.2:

“The (Enterprise Governance) committee will assess each proposed development to ensure that the displacement of existing Lancashire based companies does not occur and that any development is genuine growth in and support to the Advanced Engineering and Manufacturing sector.” [Text in brackets inserted for clarity].

- 3.7 This same restricted occupancy applies to the Warton site. Thus, as noted in the *Lancashire Advanced Engineering & Manufacturing Enterprise Zone Phase 1 Site Consultation Masterplan* (October 2014) at paragraph 1.6, permitted development can take place on the site providing it meets certain conditions, which includes restricting uses to industries within the following Standard Industrial Classifications:

- Aerospace;
- General Aviation Services;
- High-end automotive;
- Computing, systems engineering and autonomous systems;
- Nuclear;
- Advanced flexible materials;
- Renewable energy.

- 3.8 The above requirements mean that the rate of occupancy take-up on the EZ is likely to be less dramatic during the early stages of the EZ than more open business parks. In fact, practical occupancy has only been possible since 2015, when Wincanton were the first non-BAE Systems occupier. However, occupation rates are likely to accelerate after the initial set-up and preparation phase, reflecting the strong ambitions the development partners have for the scheme.

- 3.9 The significant role that the EZ is expected to play in the local and regional economy is stressed in the *Lancashire Local Enterprise Partnership (LLEP) Strategic Economic Plan* (March 2014). It firstly recognises at paragraphs 1.8 – 1.13 the importance and value of the advanced engineering and manufacturing sector in the Lancashire economy:

“Lancashire’s tradition in the aerospace, advanced manufacturing and nuclear sectors provides Lancashire with a strong platform on which to develop, sustain and grow clusters of international importance. Our analysis indicates core capabilities which Lancashire possesses, can be deployed within the aerospace, automotive and energy clusters, and their supply-chains, to sustain the existing economic base, underpin new growth and secure re-shoring opportunities from overseas. The county has the single largest concentration of aerospace production in the UK, employing over 20,000 people. ... The capability that exists within BAE Systems at Salmesbury and Warton is unique, in that the skills

and resources are still in place to design and integrate a whole aircraft in one sub-region of the UK”.

- 3.10 It then goes on at paragraph 1.14 – 1.15 to note that:

“As a result of these inherent sector strengths and specialisms, Lancashire’s Enterprise Zone (EZ) will provide a world class development opportunity, which will enable companies to build upon the Zone’s direct adjacency to BAE Systems and by being at the heart of the county’s significant aerospace supply chain.

The sector is balanced between civil and defence related production, and the predicted industry growth trajectory, particularly the civil markets, look strong with 5% annual growth forecasts for the next 30 years”.

- 3.11 This is reinforced by the Fylde Borough Council *Economic Development Strategy and Action Plan* (January 2013), which stresses the value of the EZ to the local economy at page 57 under Themes 5: Enterprise Zone, Warton, thus:

“Land at BAE Systems, which is a designated Enterprise Zone, will be a focus for economic growth and job creation in the Fylde. The redevelopment of part of this site as a key location for advanced engineering and manufacturing businesses will see the creation of significant new employment opportunities. It is hoped that the zone will create 4,000-6,000 high value jobs in the long term capitalizing on new and emerging opportunities in the advanced manufacturing sector. The development of the local supply chain will be a key objective”.

- 3.12 The above points highlight the importance of the LEZ to the regional economy, and that of Fylde in particular. There is strong formal support for the EZ from LLEP and Fylde Borough Council, as well as expectations from central Government as part of the approval and funding support for the EZ.
- 3.13 As such, the employment potential that may arise from the EZ over the time-frame of Local Plan cannot be ignored. A reasoned assessment of likely additional employment generation needs to be made in order to fully understand the wider impacts upon Fylde Borough, particularly in terms of housing demand.

Blackpool Airport Enterprise Zone (BAEZ)

- 3.14 Blackpool Airport Enterprise Zone (BAEZ) was established in 2016, and is spread across the Blackpool and Fylde border. It is approximately **144** hectares in size and is managed by the Blackpool, Fylde and Wyre Economic Development Company.
- 3.15 The focus of the EZ is upon the energy, food and drink manufacture, digital and creative industries, advanced manufacturing, and aviation and aerospace. However, as noted in the Amion Report *Independent Assessment of the Economic Prospects of Fylde* (May 2017) at section 2.4:

“the key principal driver behind the Enterprise Zone is identified as being job creation and industry diversification, so the uses at the site could become relatively broad”.

3.16 Since its start-up in 2016 the BAEZ has seen considerable interest and take-up of space. During the first year of operation over **200** businesses employing approximately **1,500** people have occupied space⁵. Of this total, **28** are new companies creating **450** new jobs.

3.17 Blackpool Council have recognised the significant employment potential that the BAEZ offers:

“The interest that has been sparked in the business world already could make it one of the most successful enterprise zones in the country, and that can really be put down to the combined effort that has gone into these plans⁶.”

3.18 The intention is that BAEZ will create **140** new businesses and approximately **3,000** new jobs by 2030⁷.

3.19 It can be seen that BAEZ has had significant success during the first year of operation. The **450** new jobs represent **15%** of the target ambition of **3,000** new jobs by 2030. This is a rate of growth twice what would be expected if the **3,000** new jobs delivered equally across each year between 2015 and 2030.

3.20 As with the LEZ, the employment growth impacts that BAEZ is expected to have cannot be ignored as part of the assessment of economic prospects for Fylde. The employment potential of the EZ is being delivered, faster than average and so needs to be properly incorporated into the assessment of realistic employment growth in Fylde over the Local Plan period.

Employment Potential of EZs

3.21 The employment potential of the LEZ and BAEZ have been outlined as part of the submission to central Government, and have been encapsulated in the draft Masterplan in the case of the LEZ and development proposals for the BAEZ. In summary, the employment growth plans are as follows.

⁵ LiveBlackpool (April 2017) ‘Blackpool Enterprise Zone celebrates first anniversary with rapid growth’

⁶ LiveBlackpool (November 2015) ‘The Blackpool, Fylde and Wyre Economic Development Company (BFW EDC) has welcomed the news that Blackpool Airport has been allocated Enterprise Zone status’

⁷ LiveBlackpool (April 2017) ‘Blackpool Enterprise Zone celebrates first anniversary with rapid growth’

Enterprise Zone	Employment Impacts
Lancashire Enterprise Zone (LEZ)	<ul style="list-style-type: none"> • Create 4-6,000 high-value jobs across Warton and Salmesbury over the long-term, including 1,200 in the short to medium term (2011-2037). Approximately 155-230 jobs per annum. • Approximately 52% of these jobs may be at Warton and 48% at Salmesbury. • 5-7,000 further jobs in the local supply chain. Approximately 190-270 jobs per annum.
Blackpool Airport Enterprise Zone (BAEZ)	<ul style="list-style-type: none"> • Create 3,000 new jobs (2015-2041). Approximately 115 jobs per annum. • Additional jobs in the local supply chain not specified.

3.22 The Amion Independent Economic Assessment Report recognises the importance of these developments:

“Of particular relevance to this study, for example, are the creation of the Enterprise Zones at Blackpool Airport and Warton. Within the Borough’s Economic Strategy and the Blackpool Fylde and Wyre Economic Development Company’s ‘Framework for Inclusive Growth and Prosperity’, the Enterprise Zone at Blackpool Airport and Warton are identified as drivers of economic growth and job creation.”⁸

“Local interventions could also lead to additional employment growth. For example, development at the two Enterprise Zones within Fylde is expected to create a range of new employment opportunities, including high value sectors.”⁹

3.23 A formal phasing of the forecast job creation at the EZs has not been published at this stage. As a result, whilst acknowledging the significance of the two EZs, the Amion Report excludes any formal assessment of their likely employment impacts on the basis that there is some uncertainty over the timings and scale of these impacts. This avoids assessing a live, active and major set of drivers which will impact upon employment growth in Fylde over the Local Plan period, and so results in an incomplete and unrealistic assessment of future employment growth in Fylde Borough.

3.24 A realistic and robust indication of the scale, timing, additionality and local job retention of the two EZs can be made, particularly alongside appropriate

⁸ Independent Assessment of the Economic Prospects of Fylde (May 2017). Section 2.4, page 144

⁹ Independent Assessment of the Economic Prospects of Fylde (May 2017). Section 2.4, page 146

sensitivity testing. We have therefore assessed the realistic employment potential of the EZs, based on the Government approved plans for the two EZs. This excludes additional impacts that may arise from Hillside International EZ or the Salmesbury element of the LEZ, which are likely to have job impacts upon Fylde Borough.

- 3.25 Experience from the first wave of Enterprise Zones in the 1980s is informative in this context. Studies by Professor Peter Tyler at the University of Cambridge have examined the impacts of the 1980s Enterprise Zones and related them to the plans of the current wave of Enterprise Zones, which include the LEZ and BAEZ.
- 3.26 The 1980s Enterprise Zones were set-up for different purposes and faced different issues to the current EZs. As such, they were viewed as more successful in terms of property-regeneration and place-changing than in generating net additional employment.
- 3.27 Some of the key factors that influenced their economic performance included the extent to which the EZs were able to access new economic opportunities and also the extent to which it was necessary for them to overcome market failures before much economic development could occur¹⁰. In fact, the EZs that were more successful were those in which the EZ was a coherent part of a broader local economic strategy, and which considered the most appropriate sectors and companies that should be attracted to the site. The identification of barriers inhibiting growth and how these could be overcome was also important, as was ensuring that the necessary infrastructure was in place to connect the zone to the local and wider economy¹¹. These are all issues that the LEZ and BAEZ have addressed as part of their set-up and master-planning work, effectively building upon the lessons learnt from the 1980s EZs.
- 3.28 Given the particular set of circumstances and focus of the EZs in the 1980s, the level of job additionality from the 1980s EZs was approximately **50%**; in other words, **50%** of the jobs were additional in that they would not otherwise have been in the local areas concerned¹². In fact, additionality was greatest in manufacturing-orientated EZs, and was highest in locations that were classed as ‘non-urban accessible’, which broadly corresponds to the form of the LEZ and BAEZ. In such locations, the additionality level could be of the order of **80%**¹³.
- 3.29 In terms of build-up of employment generation, whilst there were differences between individual 1980s EZs, overall activity showed a broadly similar trend. The first 4-5 years showed a stable but positive level of employment growth,

¹⁰ Public Policy Institute for Wales (Feb 2015) *Governing for Success: Reviewing the Evidence on Enterprise Zones*. Peter Tyler, University of Cambridge. Page 4

¹¹ Public Policy Institute for Wales (Feb 2015) *Governing for Success: Reviewing the Evidence on Enterprise Zones*. Peter Tyler, University of Cambridge. Page 2

¹² Public Policy Institute for Wales (Feb 2015) *Governing for Success: Reviewing the Evidence on Enterprise Zones*. Peter Tyler, University of Cambridge. Page 7-8

¹³ *Making Enterprise Zones Work: Lessons from Previous Enterprise Zone Policy in the United Kingdom*. (2015) Peter Tyler, University of Cambridge. Page 6-7, 13-15

generally about half the rate of subsequent years. After the initial 4-5 years, there was a year-on-year linear increase in employment growth¹⁴.

- 3.30 We have provided an indication of appropriate employment generation from the Warton LEZ and BAEZ, based on realistic and relevant assumptions and reflecting some of the findings from previous EZs. The results are summarised in the table below.
- 3.31 Rows 1 and 2 work from the published total employment projection figures for the two EZs, covering the respective years over which these forecasts run. In the case of the LEZ it is 2011-2037 and for BAEZ it is 2015-2040. Row 2 translates this into an annual equivalent employment rate based on a straight-line average over the forecast periods.
- 3.32 Row 3 re-adjust this anticipated employment growth to cover the timeframe of the Fylde Local Plan (2015-2032). An allocation of employment growth to the Warton site is summarised in Row 4, which is assumed to be approximately **52%** of the LEZ total.
- 3.33 Based on evidence from analysis of the 1980s EZs, a range of likely 'additionality' (i.e. net new jobs) has been made, which ranges from **50%** to **80%**. This provides a more cautious assessment of potential job growth, notwithstanding that both EZs are aiming for all jobs to be new additions to the area. The results are summarised in Rows 5a and 5b.
- 3.34 Not all of these jobs are likely to be taken up by future residents of Fylde, however. This is despite the fact that the existing high-quality and skilled nature of the current workforce, as well as the attractiveness of the area and general quality of life, would be a draw for pulling-in additional qualified residents. As such, it has been assumed that future new jobs at the EZs would be taken up on a similar ratio to the 2011 Census in terms of people living within Fylde who work in Fylde, which is **41%**. The results are summarised in Rows 6a and 6b.
- 3.35 Rows 7a and 7b translate the results into an annual equivalent job growth for Fylde for the Local Plan period 2015-2032. This indicates a potential range of additional jobs – above that proposed in the Amion Report of **91** jobs per annum – of between **+41** to **+79** jobs per annum. This is equivalent of **697-1,338** new jobs in Fylde over the period 2015-2032.

¹⁴ Making Enterprise Zones Work: Lessons from Previous Enterprise Zone Policy in the United Kingdom. (2015) Peter Tyler, University of Cambridge. Page 3-4

		Enterprise Zone		
		Direct Employment		
		LEZ	BAEZ	Total
1	Total Employment from EZ	4-6,000 (2011-2037)	3,000 (2015-2040)	7-9,000
2	Annual Equivalent	154-231	120	274-351
3	Total Employment in Fylde Local Plan Period (2015-2032)	2,615-3,923	2,040	4,655-5,963
4	Warton Site Total Employment Element	1,360-2,040	2,040	3,400-4,080
5a	Additionality (Total Employment) @50%	680-1,020	1,020	1,700-2,040
5b	Additionality (Total Employment) @80%	1,088-1,632	1,632	2,720-3,264
6a	Fylde Total Employment Potential Retention (with 50% additionality)	279-418	418	697-836
6b	Fylde Total Employment Potential Retention (with 80% additionality)	446-669	669	1,115-1,338
7a	Annual Equivalent (with 50% additionality)	16-25	25	41-49
7b	Annual Equivalent (with 80% additionality)	26-39	39	66-79

Source: CCL calculation

- 3.36 As a sensitivity test a slower build-out of the EZs has been assumed. This is equivalent to 75% of the above job growth. This would result in between **+31** to **+59** new jobs per annum in Fylde, or **523-1,004** jobs in total.
- 3.37 As a more extreme sensitivity test, a number of the key variables were constrained. The number of jobs at the Warton site was assumed to be only **25%** of the overall total for the LEZ. The lower proportion of **50%** additionality in terms of jobs from the EZs was used and only **25%** of the new jobs would be retained within Fylde retention. The phasing programme was also reduced to **60%**. Under these highly-constrained conditions the two EZs would generate an additional **+12-13** jobs per annum, or **204-221** in total over Plan Period.

Conclusions

- 3.38 It defies logic not to include the employment impacts of the two EZs (LEZ Warton site and BAEZ) within an assessment of Fylde's economic prospects.
- 3.39 The time, planning, commitment and resources that have gone into the development, set-up and operation of the EZs, as well as agreement with and commitment to central Government in order to secure approval and funding, indicates a serious intent to make the EZs a success.
- 3.40 Despite this, the conclusion drawn from the Amion Report is to effectively say that there will be no jobs arising from the EZs. As evidence from the first year of operation of the BAEZ has demonstrated, this is clearly not the case.
- 3.41 It is recognised that there will always be uncertainties in the assessment of employment associated with the EZs, as it is for the underlying baseline employment projections provided by the economic forecasting houses. However, this is not in itself a reason for avoiding such an assessment.
- 3.42 Understanding the likely level of **additional** employment that may arise in Fylde over the next 20 years is critical to ensuring adequate provision to support such growth is in place. If it assumed that such an assessment is too uncertain or too complex, then it risks under-providing for local residents at best, and bordering on a dereliction of responsibility and commitment to local residents, development partners and central Government at worst.

Wiltshire

Albany House
High Street, Hindon
Wiltshire
SP3 6DP

T: 0330 223 1510

.....

Bristol

10, Victoria Street
Bristol
BS1 6BN

T: 0117 3324 573

.....

E: info@chilmarkconsulting.co.uk
Twitter: [@chilmarkUK](https://twitter.com/chilmarkUK)

.....

Eddie Graves

From: [REDACTED]
Sent: 13 September 2017 17:35
To: PlanningPolicy; Tony Blackburn

Please find below comments in relation to the consultation on the amendment pages to the Local Plan. I would be obliged if my comments could be passed to the Planning Inspector dealing with the Inquiry in Public

I confirm that I believe that the comments made in the Minority Reports are still relevant but would add the following points:-

Affordable Housing. I still totally disagree with the number of affordable houses shown as being needed by Fylde over the period of the plan, the evidence used is, in my opinion, flawed and intentionally used to provide a justification for the policy, it is not based on fact but vision and aspiration. I am also of the opinion that affordable housing should be spread throughout the Borough, where there is sustainability, it should not be concentrated wholly in the urban area. Many of the villages will perhaps point to lack of need in their own area but in my opinion all areas should take a share of those on housing waiting lists, this is balanced housing which should be welcomed.

Five Year Supply. It is my opinion that developers are land banking, and the present planning system is allowing them to abuse it to do so, they are not producing houses in sufficient numbers to substantiate their arguments for sites to be made available, the Council has no control of the build out rate. This is causing difficulty in achieving the five year supply, causing over allocation of sites, which is causing green fields in Fylde to be devoured. It is in the developers' interests to part develop sites, reducing delivery, ensuring the need for yet more greenfield sites.

Employment Land. Employment land need is grossly exaggerated and is not supported by evidence, six out of seven methods of calculating employment land need showed either status quo or decline in land need, yet Fylde chose to use the one method which demonstrated growth, and broader evidence shows that the need shown is unjustifiable. Evidence shows that BAe and other large employers are contracting and job creation in Fylde is modest. I therefore contend that as housing growth is predicated on job growth then the number of houses is far too high.

Fracking. I do hope that a policy can be put in place for this industry, it is known that this industry will produce very few jobs within Fylde (11 full time jobs), it is also important that, if it is to go ahead, it is in the right place to safeguard Fylde residents. It is possible for fracking to be done vertically and horizontally for quite a substantial distance, it should therefore be restricted to being carried out on existing industrial land where facilities are in place to accommodate an industrial process.

Could you please confirm receipt of this email?

Regards, Liz Oades

Sent from [REDACTED]

Date: 17 August 2017
Our ref: 222620



Fylde Borough Council

planningpolicy@fylde.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

**Fylde Local Plan to 2032
Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032**

Thank you for your consultation on the above dated and received by Natural England on 02 August 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have reviewed the submitted Consultation on Additional Evidence in Support of the Fylde Local Plan To 2032, August 2017 and advise that **Natural England does not have any specific comments to make on this document.**

We welcome the opportunity to view and comment on the modifications to the Local Plan when they are available.

For any queries relating to the specific advice in this letter only please contact Elizabeth Knowles on 0208 225 7506. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

Miss Elizabeth Knowles
Lead Adviser
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

Eddie Graves

From: Alban Cassidy <AlbanCassidy@cassidyashton.co.uk>
Sent: 14 September 2017 11:40
To: PlanningPolicy
Cc: Julie Glaister
Subject: Consultation on Additional Evidence in Support of the Fylde Local Plan 2032

Dear Julie

I refer to the above document and now attach our consultation response prepared on behalf of Oyston Estates Ltd.

Our comments chiefly relate to the main body of the text and are therefore referenced by para. number.

Para. 2.1 It is noted that the document reiterates the Housing Requirement figure of 415 dpa. However, despite this being within the range of the Objectively Addressed Housing Need of 410 – 430 dpa, we do not consider that this figure is robustly justified for the reasons set out below.

Para. 2.6 It would appear from this para. that the requirement of 415 dpa seems only to be justified as falling within the range of the OAHN but reflecting a significant increase in historic building rates. This does not constitute real justification for the figure being proposed.

Para. 2.8 Furthermore, the evidence acknowledges that this will still result in a huge shortfall in affordable housing provision over the plan period and it would therefore not be unreasonable to increase the Housing Requirement to support the provision of a greater supply of affordable housing.

Para. 2.17 Moving on to the economic justification for the Housing Requirement set out in the Additional Evidence Document, it is noted that this does not take into account the recent re-purchase of Blackpool Airport by Blackpool Borough Council which now provides greater certainty in respect to future investment and job growth at the site. The Masterplan that is being prepared can now be done with more confidence that the target of some 5,000 new jobs can be achieved. This will obviously have an impact upon economic growth and future housing requirements.

Therefore, the conclusion on Chapter 2 is that the OAHN is insufficient and therefore the plan will continue to make insufficient allowance for the provision of new housing in the Borough of Fylde.

Para. 3.4 In response to the Inspectors request for information in respect to question 3 ii) *“Are there any additional sites available within the Borough that would conform to the Plan’s development strategy and be deliverable within the first five years?”* the answer is an unequivocal yes for the reasons set out below.

Paras. 3.12 - 17 The council asserted that the hearings of 20 & 21 June “demonstrated” that large sites will take almost five years to commence delivery and that only sites of less than 15 can contribute to housing land supply within the next five years.

This is quite simply nonsense and relies only on data relating to one particular site that will take 4.5 years to commence delivery due to a unique set of circumstances. (This position also contradicts the table in para 14 of Annex 2 p183 which sets out timelines for the delivery of houses on larger sites).

The site from which the Council’s position is taken is Whyndyke Garden Village and the evidence referred to was provided by Cassidy + Ashton.

The reasons for the particular delay on that site are many but include:

- the “Bare Outline” nature of the application with no details of layout;

- the scale of development and the need to co-ordinate multiple developers;
- the fact that the site is one of the Government's nominated Healthy New Towns;
- the need for all off site highway works to be fully designed and agreed prior to any development commencing; and
- the need for an internal link road of almost 1km in length to be fully constructed prior to any occupation on the site.

In the context of Fylde, these circumstances are unique to Whyndyke Garden Village and cannot therefore be used as a basis for determining the length of time it would take other sites to begin to contribute towards the five year housing land supply. To do so is rather ridiculous.

In this respect the site of North Houses Lane, which is the subject of a current application ref. 5/2017/0296 for 500 dwellings and conforms to the local Plan's development strategy, would be able to contribute housing within about 18 months due to access being available without substantial highway works and the fact that the site can easily be taken forward by two co-developers on the lines of the indicative scheme already prepared. The potential constraints referred to in para. 3.16 of the document are not applicable to this site for reasons set out in the application.

This site could therefore make a valid contribution of between 180 – 210 units within the five year period in a sustainable location that wholly accords with the Plan's development strategy.

Furthermore, contrary to para 3.14 there is no justification for limiting any additional sites to between 10 and 15 dwellings to be built within the five year period. That is not any way justified by the NPPF or anywhere else. Indeed, if a site goes beyond the five years but is in line with the development strategy there will be no harm caused.

The figure of 15 units has simply been calculated from the contribution Whyndyke Garden Village [and therefore in the Council's eyes any large site] is estimated to make in the next five years. This is calculated on the basis that it will commence delivery in 4.5 years and the Council's anticipated build out rate is 30 dwellings per annum. Such an approach makes no sense whatsoever and is totally unjustified.

Para 4.4 Moving on to Chapter 4, it is noted that the settlement hierarchy set out in Policy S1 remains in the Council's opinion, robustly justified. We have no argument with this position which indeed lends further support to concentrating development in St Annes as the most sustainable settlement rather than in outlying areas.

Paras 5.7 – 5.8 Policies SL1–5 as appropriate should be revised to include the allocation of land at North Houses Lane which is the subject of application ref. 5/2017/0296 for 500 dwellings which was, in any event, previously allocated for residential development.

Para. 5.10 Policy H1 should not set a housing requirement of 415 dpa. At the very least a figure of 430 dpa should be adopted but with the failure to take true account of economic growth and address the shortfall in the provision of affordable housing, a higher figure would be more appropriate.

Paras. 6.3 – 6.5 The potential need for further Sustainability/Habitats Regulation Assessment [HRA] work which has not yet been undertaken is noted and indeed follows a similar reluctance from the Council to update the HRA in respect to Lytham Moss and the land at N Houses Lane. This now provides an appropriate opportunity for the work to be done.

I trust that due regard will be taken of these representations and would be grateful if you could acknowledge receipt.

Regards

Alban

Alban Cassidy BA (Hons) Cert. Ecol. MSc MIEMA MRTPI C.Env
Director
 Chartered Town Planner and Environmental Consultant

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Cassidy+
Ashton



Architecture + Building Surveying + Town Planning

CASSIDY + ASHTON | 7 East Cliff, Preston, PR1 3JE

T: +44(0)1772 258356

E: albancassidy@cassidyashton.co.uk

Visit our website: www.cassidyashton.co.uk



Follow us on:

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PERSIMMON HOMES LANCASHIRE

Persimmon House, Lancaster

Business Park, Caton Road

Lancaster

Lancashire

LA1 3RQ

Tel: 01524 542000

Main Fax: 01524 542001

Customer Care Tel: 01524 542065

Customer Care Fax: 01524 542066

www.persimmonhomes.com

Mr Tony Blackburn,
Programme Officer
15 Ottawa Close,
Blackburn,
Lancashire,
BB2 7EB

14th September 2017

Dear Tony,

1. The following letter is provided as a statement on behalf of Persimmon Homes Lancashire, in relation to the relevant sections of the 'Additional Evidence in Support of the Fylde Local Plan to 2032' consultation.
2. The enclosed representations will specifically address 'Economic forecasts, Objectively Assessed Need and the Housing Requirement Figure' and 'the five year Housing Land Supply and the Housing Trajectory' sections of the additional evidence.

Economic forecasts, Objectively Assessed Needs

3. **The Housing Requirement:**

Persimmon Homes supports the production and presentation of additional evidence to support the Objectively Assessed Need (OAN) figure of 415 dpa within the borough.

4. **OAN, Housing Delivery and Affordable Housing:**

In relation to the additional evidence set out under this heading, Persimmon Homes agrees that the specific allocation of sites does provide greater certainty over the deliverability of housing. However, due to factors beyond the Council's control, such as the economic climate, flexibility regarding additional, as of yet unidentified sites, should be encouraged and supported too. There is a strong probability not all the identified sites will be delivered, despite assurances regarding deliverability currently.

Persimmon Homes supports the positive uplift in the housing requirement of 51%, to provide a figure of 415d dpa.

5. **Accommodating a Reasonable Level of Job Growth:**

Persimmon Homes supports the additional evidence provided in relation to employment growth levels within the Fylde borough.

6. **Balancing Housing Needs and Employment Growth:**

Persimmon Homes acknowledges the uncertainty surrounding the relationship between the future growth in jobs and population change, and linked to this supports the Council's approach in providing headroom against the lower projection of need. Planning for the provision of 415 dwellings per annum demonstrates the Council has an aspiration to support growth. However, Persimmon Homes would also encourage the Council to adopt the higher figure of 430 dpa as identified by the OAN range.

7. **Summary:**

In summary, Persimmon Homes is broadly supportive of the Council's Additional Evidence for the OAN in support of the Fylde Local Plan to 2032. However, we do have reservations regarding the Council's apparent inflexible approach regarding sites which are not currently identified within the 5 year housing land supply. Despite best efforts on all sides, some of the sites listed will not come forward for a number of reasons, and with such a rigid reliance on this identified list, the Council will fail to provide the required level of housing. Flexibility needs to be supported, to supplement the identified list of sites, to ensure the Council more than meets the required level of housing development over the Plan period.

The Housing Requirement Figure

8. **The Five Year Housing Supply Statement:**

Persimmon Homes notes the Council's statement that the 5 year housing land supply statement and the housing trajectory have been updated to reflect factual information regarding delivery rates. However, a degree of flexibility should be factored in to reflect changes in circumstances and market conditions.

9. **Sites brought forward:**

See comments above.

10. **Additional Sites:**

Linked to the above comments, not all of these sites will be brought forward and delivered within the timeframes the Council is currently placing a heavy reliance upon.

We do not agree with the statement set out in paragraph 3.13. On paper the Council may have sufficient site capacity to deliver the required number of dwellings, and therefore avoids identifying an oversupply as it may adversely affect strategic site delivery. Persimmon Homes does not support the idea that 'the inclusion of additional sites that provide an excess of development later in the Plan period is contrary to the development strategy'. Identification and support for additional sites will prevent the Council from falling into a position of undersupply and not being able to demonstrate a 5 year housing land supply. Persimmon Homes does not support the notion that taking this approach will threaten the delivery of strategic sites.

Again, linked to this, we disagree that should additional sites be required, there would be a cap of between 10-15 dwellings delivered per annum. Persimmon Homes can deliver far in excess of 10-15 dpa. Capping delivery to sites of under 15 units will further exacerbate a problem; should additional sites be needed to meet supply requirements, limiting the level of development on them would act as a barrier.

11. **Five Year Supply Methodology:**

As noted in paragraph 3.26, the new housing requirement of 415 dpa will represent a boost to the supply of housing in Fylde, when compared to previous figures, which Persimmon Homes supports. Persimmon Homes also highlights the Council's identification of the vagaries of the housing market and a slowdown in demand, which as it currently stands with such a fixed list of sites, could easily result in the Council missing its delivery target of 415 dpa. On this basis, if the Council supported a more flexible approach to additional sites coming forward, which would deliver any number of units, this would help to demonstrate the Council is trying all options to meet the 415 dpa, and 5 year housing land supply targets required.

Persimmon Homes welcomes the opportunity to provide further commentary where appropriate and requests to be kept informed of any further consultation stages. In the meantime, should you require any further information, or wish to discuss anything further, please do not hesitate to contact me on the number above.

Yours faithfully



Claire Norris
Persimmon Homes Lancashire

Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032

Representations on behalf of Story Homes Limited

September 2017

Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032

Project Ref:	27227/A3/REPS/HW/DM	27227/A3/REPS/HW/DM
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Date:	11 th September 2017	13 th September 2017
Prepared by:	Hannah Walker	Hannah Walker
Checked by:	Dan Mitchell/Client	Client

Barton Willmore LLP
Tower 12, 18/22 Bridge Street
Spinningfields
Manchester
M3 3BZ

Tel: 0161 817 4900

Ref: 27227/A3/REPS/HW/DM

Email: dan.mitchell@bartonwillmore.co.uk

Date: September 2017

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APPENDIX F – EMAIL FROM HEADTEACHER OF GREAT ECCLESTON COPP C OF E SCHOOL

1. INTRODUCTION

- 1.1 These representations are submitted on behalf of Story Homes Limited (hereafter referred to as our "Client"), in response to the additional evidence produced by Fylde Borough Council in support of the Fylde Local Plan 2032, during the course of Stages 1 and 2 of the Examination in Public. This new evidence has been presented as Annexes to the overarching consultation document published by the Council in August 2017.
- 1.2 The consultation document provides further commentary on the issues to which the evidence relates and provides answers to specific questions raised by the Inspector in her letter to the Council dated 3rd July 2017. This includes justification for amended the housing requirement, justification for the approach to backlog for housing delivery and specific queries relating to the settlement hierarchy. The document then goes on to consider the implications of this new evidence on policies of the plan, in particular any modifications that may be required.
- 1.3 As stated above, the consultation document is supported by a series of evidence base documents. Annex 1 contains evidence in support of the updated Objectively Assessed Need (OAN) and Housing Requirement Figure. Annex 2 contains the updated 5 Year Housing Land Supply Statement (5YHLSS) and accompanying housing land supply trajectory and Annex 3 contains the Settlement Hierarchy Note.
- 1.4 At this stage, our Client does not intend to provide representations in response to the Council's OAN and revised housing requirement figure, however, this does not mean our Client agrees that the requirement is appropriate. Instead our representations will focus on the Council's 5 Year Housing Land Supply (5YHLS) position and new evidence produced in support of Elswick's designation as a 'Tier 2: Smaller Rural Settlement' within the settlement hierarchy.
- 1.5 Our Client has previously raised significant concerns via written representations and at the Examination in Public (EiP) in relation to the settlement hierarchy, housing land supply position and the deliverability of allocated sites.
- 1.6 Whilst the Council has produced additional evidence to support their position, as set out later in these representations, our concerns remain and we would be grateful if the Inspector will give full consideration to these concerns at the next stage of the EiP.

2. FIVE YEAR HOUSING LAND SUPPLY

Introduction

- 2.1 This Five Year Housing Land Supply Assessment is submitted in response to the Council's updated Five Year Housing Land Supply Statement (2017 5YHLSS) contained within Annex 2 of the Additional Evidence document.
- 2.2 This updates our Client's previous position set out in our Matter 3 Hearing Statement¹ in response to Question 24(a) of the Inspector's Matters Issues and Questions. The purpose of our Assessment is to determine whether the Council's new evidence is robust. To assess whether or not the Council can demonstrate a 5YHLS, our Assessment will:
1. Assess what the appropriate five year housing requirement, in particular the approach to backlog (Liverpool v Sedgefield);
 2. Analyse the 5YHLS claimed by the Council in its trajectory included at Appendix 2 of the 2017 5YHLSS; and
 3. Balance the revised supply figure against the emerging housing requirement.
- 2.3 We discuss each element of the 5YHLS in further detail below.

Five Year Land Supply Requirement

Housing Requirement

- 2.4 The Council's 2017 5YHLSS is based on the Council's emerging housing requirement of 415dpa for the plan period 2011 – 2032. This is an uplift from the Council's previously proposed requirement of 370dpa within the Submission Draft Local Plan.
- 2.5 The Strategic Housing Market Assessment (SHMA) Addendum 3 (May, 2017)² produced by Turley provides evidence to justify the amended housing requirement. It sets the plan period as 2011-2032 and outlines a variety of housing growth scenarios considered in deriving the OAN for Fylde. The document concludes that the OAN range for the Borough is between **410 – 430dpa** taking account of the most recent 2014 SNHP and Independent Economic Assessment.

¹ Document Ref: EL2.022c

² Document Ref: EL5.003f

2.6 The Council's chosen housing requirement of 415dpa sits within the lower end of this range. Paragraphs 2.21 and 2.22 of the consultation document³ provide the justification for the chosen housing requirement figure.

2.7 Whilst we do not intend to make specific representations in response to the evidence produced in support of the housing requirement, it should be noted that the Council's chosen housing requirement is at odds with the recommendations in their evidence base. Paragraph 6.38 of the SHMA Addendum 3 concludes:

*"Whilst a range of OAN for housing has been concluded – associated with the range of job growth considered reasonable within the Independent Economic Assessment – it is recognised that this report concludes that it is 'expected...that the likely level of employment growth will be at the upper end of this range'. **It is therefore considered that the full need for housing will be more closely aligned with the upper end of the identified OAN range.**"*

2.8 To boost significantly the supply of housing as required by paragraph 47 of the NPPF, and to support the Council's own economic growth strategy, we consider **430dpa** is a more appropriate housing requirement for the Borough.

Backlog

2.9 In accordance with guidance contained within Paragraph 030 Reference ID: 3-030-20140306 of the PPG, we agree with the Council for the purposes of calculating the five year supply the backlog against the housing requirement for 2011/12-2016/17 should be considered.

2.10 The Council has delivered a total of 1,538 dwellings over the past 6 years. Assessed against the Council's proposed requirement of 415dpa, the backlog for the period would be 952 dwellings. Assessed against our Clients proposed housing requirement of 430dpa the shortfall would rise to 1,042 dwellings.

Liverpool v Sedgefield

2.11 Paragraph 035 (Reference ID: 3-035-20140306) of the NPPG is clear that Local Planning Authorities should aim to deal with any undersupply within the first five years

³ Document Ref: EL7.002

of the plan period where possible. This approach clearly favours the shortfall being made up within the next 5 years, known as the 'Sedgefield' method.

- 2.12 The Council's rationale for the use of the Liverpool approach is set out within Section 3 of the consultation document⁴. The Council argue at paragraph 3.23 that the plan allocates sites to provide sufficient dwellings for the whole of the plan period. As the majority of these sites benefit from planning permission this provides greater certainty that the backlog will be made up over the plan period. There are also limits as to how far their delivery can be brought forward, the Liverpool approach is therefore, considered reasonable.
- 2.13 As stated in Table 2 of the consultation document, the Council expects to deliver only 78 dwellings more than the total housing requirement over the plan period. Although the majority of sites may benefit from planning permission, the market can change, permissions can lapse and delivery rates can slow. With less than 1% flexibility in the supply, there is no certainty that the backlog would be met over the plan period. A more positive approach would be to identify additional sources of supply which could bolster delivery in the five year period to ensure the housing shortfall is met.
- 2.14 Additional supply is considered in paragraphs 3.10 to 3.18 of the consultation document. Our Client is perplexed by the Council's approach to the consideration of additional sites. Firstly, the fact sites of 15 dwellings or more would be developed beyond the five year period is largely irrelevant. The provision of a buffer would be consistent with the plan and ensure the minimum figure of 415dpa is being delivered in the event other sites do not come forward at the rate expected.
- 2.15 Secondly, there is no sound justification for the assumption that additional sites cannot come forward before Year 5. The Council should engage with landowners, developers and agents where possible to ascertain accurate information regarding deliverability as required by Footnote 11 of the NPPF.
- 2.16 Finally, the Council's claim that there are no suitable sites to meet the shortfall within the next five years is not robust. Paragraph 3.16 of the consultation document states that additional sites of between 10 and 15 dwellings on greenfield land on the edge of the Strategic Locations have been considered, however, such sites, and larger sites face significant hurdles to development. The Section concludes by stating that no sites put forward as part of the call-for-sites has provided information that sites are

⁴ Document Ref: EL7.002

deliverable. To our knowledge the Council has not asked developers and landowners to provide this additional information. There is therefore, no robust evidence that delivery of housing on other sites is not achievable within the next five years.

- 2.17 In summary, we do not accept the Council's justification for the use of the 'Liverpool' approach for calculating the 5YHLS requirement. In accordance with PPG, the 'Sedgefield' approach therefore, remains the appropriate approach to the application of backlog.
- 2.18 In this case based on the Sedgefield approach to backlog, the shortfall of 952 dwellings is added to the Council's unadjusted five year requirement of 2,075 dwellings (415dpa), which equates to an adjusted five year housing requirement of 3,027 dwellings.
- 2.19 Assessed against our Client's calculated shortfall of 1,042 dwellings, added to the unadjusted five year requirement of 2,150 dwellings (430dpa) this equates to an adjusted five year requirement of 3,192 dwellings.

Buffer

- 2.20 Paragraph 7 of the 2017 5YHLSS confirms that due to a persistent under delivery of housing in Fylde, a 20% buffer has been applied. Our Client agrees with the Council that this buffer is appropriate in line with the requirement of paragraph 47 of the NPPF.

Application of the 20% Buffer

- 2.21 The Council's approach within the 2017 5YHLSS applies the 20% buffer to both the housing requirement and backlog combined. Our Client agrees with this approach as it was accepted by Inspector's in the recent Appeals at Land off Dowbridge, Kirkham Appeal (Appeal Ref: APP/M2325/W/16/3144925).

Five Year Housing Land Supply Requirement

- 2.22 Using the Council's annual requirement figure (415dpa), the Sedgefield approach to backlog and adding the 20% buffer the Council has a five year requirement of **3,632 dwellings (726dpa)**. Using our Client's housing requirement figure (430dpa) the Sedgefield approach to backlog and addition of the 20% buffer the Council would have a five year housing requirement of **3,830 dwellings (766dpa)**.

- 2.23 The calculation for each scenario is included at Tables 3 and 4 on pages 11 and 12 of this Statement.

Supply Assumptions

- 2.24 In previous versions of the Council's 5YHLSS, lead-in times and build out rates were based on a set of standardised rates assumed across all sites. The assessment did not take into account the individual circumstances of each site.
- 2.25 Paragraph's 12 – 14 of the 2017 5YHLSS provides the Council's updated position on build-out rates and lead-in times for housing delivery. We set out our comments in response to the Council's approach in further detail below:

Build out Rates

- 2.26 As detailed in paragraph 13 of the 2017 5YHLSS, during the Stage 2 Hearing Sessions the Council agreed to amend their approach to build out rates. Where detailed further information about a specific site has been provided by the site owners, developers or agents the Council has taken this into account and set out build out rates accordingly.
- 2.27 Where there is also sufficient evidence that an established development is delivering at a rate that is a variance to the general delivery assumptions, this has been applied for the remaining units. In all other circumstances, the Council will continue to rely on the build-out rates set out within the SHLAA 2015.
- 2.28 Our Client is in broad agreement with the Council's new approach to build-out rates with an emphasis on obtaining feedback from site owners, developers and agents in the first instance. This provides a realistic assumption of when sites are likely to come forward. However, we recognise that this information may not always be available, therefore, the assumptions set out within the SHLAA 2015 are appropriate in those instances.

Lead-In Times

- 2.29 The Council's proposed lead-in times are set out within paragraph 14 of the 2017 5YHLSS. For ease of reference this information is repeated in Table 4 below:

Table 1: Extract from the 2017 5YHLSS – Lead-in Times

Site Status	Assumed Year of Commencement
Full planning permission, with signed Section 106	Year 1
Full planning permission, awaiting signing of Section 106	Year 2
Change of use, awaiting signing of Section 106	Year 2
Outline planning permission, with signed Section 106	Year 2
Outline planning permission, awaiting signing of Section 106	Year 3
Full planning application received and proposed allocation in emerging Local Plan	Year 3
Outline planning application received and proposed allocation in emerging Local Plan	Year 4
Allocated Site without a full or outline planning application	Year 5

2.30 The assumed lead-times for development reflect the assumptions made within previous 5YHLS assessments. However, as detailed within paragraph 13 of the 2017 5YHLSS the Council has amended the lead-in times to reflect further information about a specific site that has been provided by the site owners, developers or agents submitted at the Stage 2 Hearing Sessions. Again, our Client is in broad agreement with the Council's new approach to lead-in times.

2.31 In circumstances when this information is not available, the assumed lead-times set out in paragraph 13 of the 2017 5YHLSS largely provide a realistic assumption of delivery. However, the lead in times need to consider whether the site has a promoter on board as this can delay lead-in times by a further 6-9 months. This should be considered on a site by site basis.

2.32 We also note paragraph 3.12 of the consultation document states that it has been agreed that a site with a single developer allocated in the plan will commence development in the 5th year and add 15 dwellings to the five year supply. In those instances, the Council must provide robust evidence that there is a realistic prospect of sites coming forward within this time scale in line with Footnote 11 of the NPPF and PPG.

Housing Land Supply

2.33 Appendix 1 of the 2017 5YHLSS sets out the Council's 5YHLS. We provide our comments on each component of the 5YHLS in further detail below.

Existing Supply

2.34 The Council has updated the trajectory at Appendix 2 of the 2017 5YHLSS to consider the delivery rates provided by landowners, developers and agents at the Stage 2

Hearing Sessions. Otherwise, the standard assumptions have been applied. The Council claims to have an existing supply of **3,580 dwellings**.

- 2.35 We have reviewed the Council's existing supply applying footnote 11 of the NPPF and PPG⁵.
- 2.36 We do not intend to provide commentary on sites where we consider the delivery rates acceptable, however, we set out in **Appendix A of this Statement** where we consider that, based on the assumptions outlined above and/or following further research or analysis, the number of completions for any site or part of a site will not meet the Council's expected return.
- 2.37 A summary of the discounted sites is included at Table 2 below.

Table 2: Summary of Discounted Sites

Site	The Council's Supply	Story Homes Supply	Remove from Supply
SL1 – Lytham St. Annes			
Queensway (HSS1)	350 dwellings	126 dwellings	224 dwellings
Kingsway Garage (HS13)	30 dwellings	0 dwellings	30 dwellings
SL2 – Fylde – Blackpool Periphery			
Coastal Dunes (HSS4) (App Ref: 14/0392)	31 dwellings	23 dwellings	8 dwellings
Coastal Dunes (HSS4) (App Ref: 16/0062)	210 dwellings	178 dwellings	22 dwellings
Cropper Road East (MUS1) (App Ref: 15/0472)	30 dwellings	15 dwellings	15 dwellings
SL3 – Warton			
Oaklands Caravan Park (HS27)	53 dwellings	0 dwellings	53 dwellings
SL4 – Kirkham and Wesham			
The Pastures (HSS8)	192 dwellings	150 dwellings	42 dwellings
Land north of Blackpool Road, Kirkham (HSS9)	90 dwellings	60 dwellings	30 dwellings
SL5 – Non-Strategic Locations			
Quernmore Trading Estate (HS66)	10 dwellings	0 dwellings	10 dwellings

⁵ [ID: 3-031-20140306

Site	The Council's Supply	Story Homes Supply	Remove from Supply
Thornfield Caravan Park (HS41)	15 dwellings	0 dwellings	15 dwellings
Newton Hall (HS51)	15 dwellings	0 dwellings	15 dwellings
Cobweb Barn (HS50)	15 dwellings	0 dwellings	15 dwellings
Singleton Village (HS53)	15 dwellings	0 dwellings	15 dwellings
Total Discount from Existing Supply:			494 dwellings

- 2.38 In summary, based on our analysis of the Council's claimed existing supply of 3,580 dwellings (included 328 small sites and minded to approve), we have discounted 494 dwellings from the existing supply to provide a supply of **3,086 dwellings**.
- 2.39 The revised housing trajectory detailing the identified supply from each site, for both the Council's five year position and our Client's position, is included at **Appendix B**.

Potential Supply

Long-Term Empty Homes

- 2.40 The five year supply makes an allowance for bringing back 50 long -term empty dwellings increasing the Council's supply figure to 3,630 dwellings.
- 2.41 PPG is clear that:

"Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by the local planning authority at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double counting (local planning authorities would need to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in their local plans)."

- 2.42 We are unaware of any evidence available to robustly demonstrate that this source of supply would not include any double counting. An allowance should therefore, not be added to the total supply.

Allowance for Small Sites

- 2.43 The Trajectory at Appendix 2 of the 2017 5YHLSS states that 40 dwellings will be delivered from small sites and windfalls in years 4 and 5 based on historic delivery (80 dwellings in total), increasing the Council's supply to 3,710 dwellings.
- 2.44 We do not consider it unreasonable to include this assumption for small sites given previous delivery rates of windfall sites and as existing small site commitments are expected to come forward in the first three years. This therefore, increases our total supply to **3,166 dwellings**.

Non-Implementation

- 2.45 The Council has applied a 10% non-implementation allowance of 33 dwellings for small sites only reducing their total supply to 3,677 dwellings. In previous versions of the 5YHLSS the Council had applied the 10% discount to all sites, however, following a detailed forensic analysis of larger sites it is no longer considered appropriate.
- 2.46 Our Client disagrees with this approach, as it does not allow for unforeseen circumstances that may prevent a site from being deliverable or stalling. For example, the larger strategic sites are dependent on the delivery of new infrastructure such as new link roads and new schools. If this is not delivered within anticipated timescales it has serious implications on the expected delivery rates. The assumption, therefore, that all large sites will deliver as anticipated is unrealistic.
- 2.47 We recommend a 10% non-implementation allowance is applied to all permissions to allow for any change in circumstances (316dpa), this reduces our total supply to **2,850 dwellings**.

Conclusions on Five Year Land Supply

- 2.48 **The Council claims to have a total supply of 3,677 dwellings, however, we consider the total supply to be closer to 2,850 dwellings. This removes 827 dwellings from the overall supply.**
- 2.49 The components of the 5YHLS in relation to each of the scenarios are set out in Tables 3 and 4 on pages 11 and 12 of this Statement.

Assessment of Housing Land Supply

2.50 The 5YHLS position set against each of the housing requirement figures are set out in the tables below.

Council Proposed Housing Requirement – 415dpa

Table 3: Assessment of Five Year Housing Land Supply based on the Council's proposed requirement of 415dpa

		The Council	Story Homes
Five Year Housing Requirement			
a	5 year requirement (5 x 415)	2,075	2,075
b	Backlog (2011-2017)	952	952
Sedgefield Approach to Backlog			
c	5 year requirement + backlog (a+b)	3,027	3,027
d	Buffer (c x 20%)	605	605
e	Total Requirement (a+b+d)	3,632	3,632
f	Annual Requirement (e/5)	726	726
Liverpool Approach to Backlog			
g	5 year requirement and shortfall $((b/15)+a) \times 5$	2,392	2,392
h	Buffer (g x 20%)	478	478
i	Total Requirement (g+h)	2,870	2,870
j	Annual Requirement (i/5)	574	574
Components of Supply			
Existing Supply			
k	Total	3,580	3,086
Potential Supply			
l	Long Term Empty Homes	50	0
m	Small Sites and Windfall Allowance	80	80
Non-Implementation Allowance			
n	Council – 10% allowance for Small Sites Minded to Approved not coming forward	33	0
o	Story Homes – 10% allowance for Existing and Potential Supply not coming forward	0	316
p	Total Supply (k+l+m+n-o)	3,677	2,850
5YHLS Position – Sedgefield Approach			
	Difference (e – t)	+45	-782

		5.1 years	3.9 years
5YHLS Position – Liverpool Approach			
	Difference (i – t)	+ 807	- 20
		6.4 years	4.9 years

- 2.51 As set out in the table above, set against the Council’s proposed housing requirement of 415dpa and using the ‘Sedgefield’ method, the 5YHLS position is **5.1 years** based on the Council’s claimed supply. Based on our analysis of the Council’s claimed supply, against the Council’s proposed housing requirement the 5YHLS position is only **3.9 years** meaning the Council is unable to demonstrate a 5YHLS.
- 2.52 Although we strongly disagree with the use of the ‘Liverpool’ approach for calculating backlog, if the Inspector deems this approach to be justified we have provided our assessment using this method against both parties claimed supply.
- 2.53 Set against the Council’s proposed housing requirement of 415dpa and using the ‘Liverpool’ approach, the 5YHLS position is **6.4 years** based on the Council’s claimed supply. However, based on our analysis of the Council’s claimed supply against the Council’s proposed housing requirement the 5YHLS is **4.9 years** and the Council is unable to demonstrate a 5YHLS. The Council is therefore, unable to demonstrate a 5YHLS under both scenarios.

Story Homes Proposed Housing Requirement – 430dpa

Table 4: Assessment of Five Year Housing Land Supply based on Story Homes proposed requirement of 430dpa

		The Council	Story Homes
Five Year Housing Requirement			
a	5 year requirement (5 x 430)	2,150	2,150
b	Backlog (2011-2017)	1,042	1,042
Sedgefield Approach to Backlog			
c	5 year requirement + backlog (a+b)	3,192	3,192
d	Buffer (c x 20%)	638	638
e	Total Requirement (a+b+d)	3,830	3,830
f	Annual Requirement (e/5)	766	766
Liverpool Approach to Backlog			
g	5 year requirement and shortfall ((b/15)+a)x5	2,497	2,497

		The Council	Story Homes
h	Buffer (g x 20%)	499	499
i	Total Requirement (g+h)	2,966	2,966
j	Annual Requirement (i/5)	599	599

Components of Supply			
Existing Supply			
k	Total	3,580	3,086
Potential Supply			
l	Long Term Empty Homes	50	0
m	Small Sites and Windfall Allowance	80	80
Non – Implementation Allowance			
n	Council – 10% allowance for Small Sites Minded to Approved not coming forward	33	0
o	Story Homes – 10% allowance for Existing and Potential Supply not coming forward	0	316
p	Total Supply (o + p + q + r or s)	3,677	2,850

5YHLS Position – Sedgefield Approach			
	Difference (e – t)	-153	-980
		4.8 years	3.7 years
5YHLS Position – Liverpool Approach			
	Difference (i – t)	+711	-116
		6.1 years	4.8 years

- 2.54 As set out in Table 4 above, set against Story Homes proposed housing requirement of 430dpa and using the 'Sedgefield' method, the deliverable 5-year supply position is **4.8 years** based on the Council's claimed supply. Based on our analysis of the Council's claimed supply and the higher housing requirement the deliverable 5-year supply position is only **3.7 years** meaning the Council is unable to demonstrate a five year housing land supply.
- 2.55 Again, if deemed appropriate by the Inspector, we have provided our assessment utilising the 'Liverpool' method against both parties claimed supply.
- 2.56 Using the 'Liverpool' approach, the deliverable 5-year supply position based on the Council's claimed supply is **6.1 year**. Based on our analysis of the Council's claimed supply against the Council's proposed housing requirement the deliverable 5-year

supply position is **4.8 years** and the Council is unable to demonstrate a five year supply.

Summary

- 2.57 On the basis of this analysis, we consider that the Council's realistic position in terms of a 5YHLS is 2,850 dwellings. This represents a reduction of 827 dwellings from the Council's claimed supply of 3,677 dwellings. It is therefore considered that the 5YHLS position using the 'Sedgefield' approach, 20% buffer and an appropriate housing requirement of 430dpa is 3.7 years.
- 2.58 Notwithstanding this, even based on the Council's own supply figure the 5YHLS position at 5.1 years using the Sedgefield approach is marginal with an oversupply of only 45 dwellings. The lack of flexibility in the 5YHLS is concerning and could result in the failure of the Plan shortly after it is adopted.

Implications for the Local Plan

- 2.59 As the Council is unable to demonstrate a robust and flexible 5YHLS, the Council should seek to allocate additional sites within the Local Plan which are suitable, available and deliverable early in the plan period and will help to achieve the Borough's housing need.
- 2.60 Policy SL5 sets out the delivery of housing outside of the Strategic Locations for development. In Elswick, the policy sets a housing requirement of 50 dwellings for the village and this will be allocated through the Neighbourhood Plan. Notwithstanding our objections to the requirement figure, our Client also raised concerns with the approach to allocations in Elswick as there is no certainty that the Neighbourhood Plan will come forward. When questioned by the Inspector at the Stage 2 Hearing Sessions the Council were unable to confirm how the Neighbourhood Plan would progress. There is therefore, no comfort that housing needs in the village will be delivered.
- 2.61 The Council also accepted at the Stage 2 Hearing Sessions any requirement for Elswick should be seen as a minimum figure and should not be seen as a cap on development. The allocation of additional sustainable sites in the village beyond the requirement would, therefore, not prejudice the overall development strategy for Elswick. These sites would provide greater flexibility in the supply if other Strategic Sites fail to come forward as expected.

- 2.62 Our Client has an interest in Land to the north of Mill Lane. The site is located on the eastern edge of the village and extends to 4.7ha. The site comprises flat open farm land, with a large pond in the centre. The site is relatively rectangular in appearance and is bound by trees and hedgerows.
- 2.63 The site is immediately available for development and within the ownership of a single willing landowner. No restrictive covenants exist and there is no current use of the site that needs to be relocated. The site is being promoted by a high quality housebuilder, currently on site at Wrea Green and Kirkham. Our Client is keen to develop additional sites in Elswick where there is an identified need for new homes.
- 2.64 The site is located adjacent to the existing urban area of Elswick, identified as a sustainable settlement for growth within the Local Plan and there is no specific landscape or heritage designations which would impact upon the suitability of the site.
- 2.65 An outline application was submitted in March 2016 for the development of 50 dwellings (App Ref: 16/0180). Despite being refused by Members at Planning Committee in February 2017, there are no outstanding statutory consultee objections to the proposed development, therefore, there are no physical constraints that would prevent this site from being suitable for residential development.
- 2.66 The site is deliverable within the next five year and would assist the Council in meeting its shortfall in housing supply in the short term. Consequently, the site should be allocated within the Local Plan.

3. SETTLEMENT HIERARCHY

3.1 The Settlement Hierarchy for the Borough is set out within Policy S1 of the Submission Version Fylde Local Plan to 2032.⁶

3.2 As set out within paragraph 24 of our Matter 4 Hearing Statement⁷ our Client objects to Elswick's designation as a Tier 2: Smaller Rural Settlement within Policy S1. We considered the Council's approach to scoring the accessibility of settlements in the supporting Settlement Hierarchy Background Paper (SHBP_ (2016)⁸ to be misleading for the following reasons:

- The Council's assessment does not consider all of the key local services identified as contributing towards a settlements sustainability as stated within paragraph's 28 and 70 of the NPPF – particularly public houses, sports venues and places of worship;
- The only reason Elswick scores marginally less than other Tier 1: Larger Rural Settlements is due to the fact it does not have a primary school within 800m of the village centre;
- When considering the full range of facilities available, as outlined in paragraph 28 and 70 of the NPPF, the village is more comparable with other Tier 1: Larger Rural Settlements rather than Tier 2: Smaller Rural Settlements. This assessment is set out in detail within Appendix 2 of our Matter 4 Hearing Statement; and
- There is no justification for the allocation of 50 dwelling in Elswick, particularly when less sustainable settlements such as Clifton have an allocation for 100 dwellings.

3.3 We concluded that for the reasons set out above Elswick should be elevated within the settlement hierarchy back to a Tier 1: Larger Rural Settlement.

3.4 Section 4 of the Additional Evidence document provides an overview of the Council's response to Question 4 of the Inspector's letter dated 3rd July 2017. This is supported by a Settlement Hierarchy Note contained at Annex 3 of the document. This includes

⁶ Document Ref: SD001

⁷ Document Ref: EL2.022d

⁸ Document Ref: ED002

a review of the bus services and a review of the Council's decision to exclude Great Eccleston Copp C of E School for the assessment for Elswick.

- 3.5 Our Client remains concerned that the Council's additional evidence on the settlement hierarchy is misleading and does not provide a true reflection of bus service provision within Elswick. We also continue to disagree that Great Eccleston Copp C of E School should not be included within the assessment for accessibility for Elswick. We therefore, continue to object to Elswick's position within the settlement hierarchy. We set out our concerns in further detail below.

Public Transport

- 3.6 The Settlement Hierarchy Note (SHN) at Annex 3 provides an update on the bus service provision for the villages of Elswick and Wrea Green following the publication of the Settlement Hierarchy Paper in March 2016.
- 3.7 As documented in Table 2 of the SHN, Elswick previously scored 2 in relation to public transport based on an overall score of 12.
- 3.8 The scoring for bus service provision is derived by combining the frequency of the bus service along with the number of settlements visited. In March 2016, Elswick had 2 buses per hour, visiting 10 destinations giving a score of 12. A bus service score of 10 – 19 equates to a settlement hierarchy score of 2 and below 10 is given a score of 1.
- 3.9 Table 4 of the SHN provides an update on the bus service provision for Elswick as of July 2017. For ease of reference this is reproduced in Table 5 below.

Table 5: Extract of Table 4 of Settlement Hierarchy Note – Bus Services for Elswick

Bus	Destination			Number per hour
	Kirkham	Newton	Preston	
75A				1
80				1

Score: Total buses per hour + number of destinations – 1 + 4 = 5

- 3.10 The Council conclude at paragraph 1.10 of the SHN that based on the current situation (July 2017), Elswick's score for bus transport has been reduced from 12 to 5, reducing

the overall bus service score from 2 to 1. The reason the Council consider this score to be low is due to the limited number and frequency of buses and routes and the fact there are no direct routes to the two main conurbations closest to Elswick namely Blackpool and Lytham St. Annes.

- 3.11 Our Client is concerned that the Council's assessment of public transport provision for Elswick in Table 9 does not provide a true reflection of the number of destinations available from the village and as such skews the scoring for this element of the settlement hierarchy assessment.
- 3.12 Firstly, the assessment does not include other Tier 2: Smaller Rural Settlements – Weeton and Singleton as destinations for travel. These settlements are deemed sustainable location within the emerging Local Plan and are considered as destinations for other towns and villages within the SHBP (2016). They should therefore, be included within the assessment for Elswick.
- 3.13 The Council's assessment also fails to consider public transport provision to any settlements within the neighbouring Borough Wyre. The assumption that all residents will only need to travel to other settlements within Fylde, and to Blackpool and Preston for work and leisure is unrealistic. Wyre operates as part of the same Housing Market Area as Fylde and Blackpool and residents travel between the three authorities for employment and leisure. Settlements within Wyre should therefore, be considered as part of the assessment along with Blackpool.
- 3.14 This is particularly important for villages such as Elswick that lie only 500m from the shared boundary of Wyre and benefit from good accessibility to services and amenities in the neighbouring Borough. The nearest main conurbation for employment and leisure to Elswick is the town of Poulton-le-Fylde in Wyre, 9km to the north west of the village. There is direct bus route from Elswick to Poulton, however, this has not been considered as part of the assessment. Fleetwood and Thornton also provide a range of services and employment opportunities. The claim that Blackpool and Lytham St. Annes are the two nearest main conurbations to Elswick is, therefore, untrue.
- 3.15 Table 6 below reflects the true bus service provision for Elswick considering all destinations of travel. A copy of the full timetables are also included at **Appendix C** of this Statement for reference.

Table 6 – Revised Bus Service Provision Elswick

Bus	Bus Services from Beech Road										Number per hour
	Fleetwood	Thornton	Poulton	Inskip	Singleton	Weeton	Great Eccleston	Kirkham	Newton	Preston	
75A											1
80											1
											1

Score: Total buses per hour + number of destinations – 1 + 10 = 11

- 3.16 Table 6 above and Appendix C of this Statement demonstrates that the bus service from Elswick travels to 10 destinations rather than the 3 destinations stated by the Council in Table 4 of the SHN. This increases the score for Elswick to 11 and equates to an overall score of 2 rather than 1. Although the bus service provision has changed, the scoring of 2 within the SHBP remains appropriate.
- 3.17 Notwithstanding this, paragraph 1.16 of the SHN states that the Council consider that bus services are now a less reliable long term measure of the relative sustainability of settlements and the settlements have been reassessed by deleting the bus service score.
- 3.18 Access to public transport is a key consideration when determining the sustainability of settlements and Section 4 of the NPPF promotes sustainable transport as a fundamental part of sustainability.
- 3.19 Public transport cannot simply be disregarded on the basis circumstances for funding from the LCC can quickly change. Funding for buses is not solely reliant on subsidy from LCC and funding for services can be secured via other methods such as Planning Obligation from new development. New development can also increase the amount of users of the bus service which can enhance the viability of the service and maintain the vitality of the village.
- 3.20 Bus service provision should therefore, still be included as part of the overall accessibility assessment to be consistent with national policy.

School Provision

- 3.21 As set out in our Matter 4 Hearing Statements, our Client previously raised concerns regarding the assessment of schools for Elswick within the SHBP. In our view Great Eccleston Copp C of E School serves the village and if awarded a score of 5 in this category would give Elswick a total score of 18, akin to the other Tier 1: Larger Rural Settlement – Wrea Green (21), Newton (21) and Singleton (15) rather than the Tier 2: Smaller Rural Settlement – Singleton (14), Weeton (14) and Clifton (14).
- 3.22 Paragraph 1.14 of the SHN concludes that as Great Eccleston Copp C of E School is more than 800m (1.2km) from the centre of Elswick and accessed via one pavement down the side of a busy 40mph road, Elswick is not considered to have easy access to a primary school. The Council contends that the deterrents to walking along this route include the narrowness of the pavement for push chairs, the speed of traffic and the exposure to the weather.
- 3.23 Firstly, this conclusion is at odds with the Council's assessment of accessibility within the recent Committee Report for Land north of Mill Lane, Elswick (App Ref: 17/0247). In this Report, Officers accepted that Great Copp C of E Primary School is within walking distance of Elswick. There was also no request from Lancashire County Council (LCC) for any contributions for improvements to Copp Lane and no concerns were flagged within the LCC's consultee response. A copy of the Committee Report is included at Appendix D for reference.
- 3.24 Notwithstanding this, it is also clear from the Admissions Policy for Great Eccleston Copp C of E Primary School (Appendix E) that the school serves the village of Elswick along with Great Eccleston and Little Eccleston. In an email from the head teacher, dated 27th June 2017 (Appendix F), it was confirmed that the school currently has 130 children on roll, 58 of which are listed as living in Elswick. Although, the school has places for 210 children and is presently under-subscribed. Nonetheless, it is clear from this evidence that the school serves the village.
- 3.25 Paragraph 55 of the NPPF states to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. In her email (Appendix F), the head teacher indicates her support for more homes in Elswick as more pupils would effectively provide more funding to help keep the school open.

- 3.26 It is clear from the evidence above that Great Eccleston Copp C of E School is the 'local' school used by most families in Elswick. The school is located 1.2km from the village and within the maximum acceptable walking distance of 2km. Although the Council consider the pedestrian routes to be a deterrent to walking to school a pedestrian route is available and LCC raised no concerns with this route as part of our Client's recent application (App Ref: 16/0247).
- 3.27 Future housing development in Elswick would also help the school to stay open in accordance with paragraph 55 of the NPPF. In light of all this evidence, Elswick should be considered as having easy access to a primary school and should be awarded a score of 5 within the accessibility assessment. This would provide Elswick with a total score of 18, taking into account public transport provision.

Implications for Policy S1

- 3.28 The SHN concludes that the Council maintain the methodology used to establish the settlement hierarchy is appropriate and sound and due to the potential volatility of bus service provisions, the Council has carried out a reassessment exercise with the bus service score discarded. The new scoring in Table 7 of the document sets out the positions of settlements within the hierarchy and confirms there are no implications for the position of Elswick within the settlement hierarchy. As concluded in paragraph 4.4 of the Additional Evidence document, the settlement hierarchy set out in Policy S1 remains robustly justified.
- 3.29 As stated above, our Client objects to the exclusion of public transport provision within the accessibility assessment. This is a fundamental component when determining the sustainability of settlements and should be included to ensure consistency with the NPPF. In the case of Elswick, based on our assessment of all the destinations and number of services available, the provision of bus services scores an overall score of 2. This reflects the scoring in the SHBP rather than the Council's assessment in the SHN.
- 3.30 Notwithstanding this, our Client remains of the view that Elswick has easy access to a primary school and a score of 5 should be added to the overall total for Elswick. This would give Elswick a total accessibility score of 18.
- 3.31 When comparing this score to other settlements in Table 7 of the SHN, this is closer to the scores for Tier 1: Larger Rural Settlement – Wrea Green (21), Newton (21) and Singleton (15) rather than the Tier 2: Smaller Rural Settlement – Singleton (14),

Weeton (14) and Clifton (14). Elswick should, therefore, be elevated within the settlement hierarchy back to a Tier 1: Larger Rural Settlement.

4. CONCLUSIONS

- 4.1 Our Client welcomes the opportunity to comment on the Additional Evidence document and the evidence contained within the supporting Annexes.
- 4.2 Whilst the Council has taken positive steps to producing additional evidence to support the Local Plan, our Client remains concerned that the Council is unable provide a robust five year housing land supply.
- 4.3 Our Client strongly objects to the use of the Liverpool approach in calculating the 5YHLS and our review of the 5YHLS suggests that the realistic position is 2,850 dwellings. This represents a reduction of 827 dwellings from the claimed supply of 3,677 dwellings. It is therefore considered that the 5YHLS position using the 'Sedgefield' approach, 20% buffer and an appropriate housing requirement of 430dpa is closer to **3.7 years**.
- 4.4 Notwithstanding this, even based on the Council's own supply figure, the 5YHLS position at **5.1 years** using the Sedgefield approach is marginal with an oversupply of only 45 dwellings. The lack of flexibility in the 5YHLS is concerning and could result in the failure of the Plan shortly after it is adopted.
- 4.5 In response, the Council should seek to allocate additional sites within the Local Plan which are suitable, available and deliverable early in the plan period and will help to achieve the Borough's housing need. This includes sustainable sites within the rural areas such as our Client's Land north of Mill Lane, Elswick.
- 4.6 In Section 3 of our representations, we set out our concerns with the evidence produced within the Settlement Hierarchy Note in relation to Elswick. We consider this evidence to be misleading and does not provide a true reflection of Elswick's accessibility credentials. Our Client's position is that Elswick should be elevated to a Tier 1: Larger Rural Settlement.
- 4.7 Overall, despite the additional evidence produced by the Council, the Local Plan cannot be considered sound in its current form as it has not been positively prepared, is not justified and is not consistent with national policy. As a result, our Client continues to object to the Local Plan as drafted.
- 4.8 We trust these representations will be afforded full consideration by the Council and the Inspector in the ongoing Examination of the Fylde Local Plan. We also reserve the

right to appear at future Hearing Sessions of the Examination in Public, on behalf of our Client, on the basis of these representations.

APPENDIX A – SITE ASSESSMENT

Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032

Representations on behalf of Story Homes Limited

August 2017

Appendix A - Five Year Housing Land Supply Site Assessment

SL1 – Lytham St. Annes Strategic Location for Development

Queensway, St. Annes (Site. Reference – HSS1)

1. Queensway, is within the single ownership of Kensington Development. The site benefits from outline planning permission for 1,150 dwellings. Reserved Matters was subsequently approved in April 2015 for 110 dwellings (App Ref: 13/0257) and a further Reserved Matters application was submitted in June 2015 for 927 dwellings, however, this application remains undetermined.
2. Kensington Developments has confirmed that it is their intention to develop the whole site themselves. The Council stated at the Stage 2 Hearing Sessions that the developer anticipates this site will deliver 100dpa. This rate of delivery has been reflected within the 5YHLS trajectory.
3. As set out in our Matter 3 Hearing Statement¹, this level of output is considered to be highly optimistic for a single regional housebuilder, given 50% of the Phase 1 development comprises detached and semi-detached properties. We would anticipate a build out rate of 30dpa to be more realistic for a single developer.
4. A number of participants, including ourselves, highlighted our concerns with the proposed delivery rates at the Stage 2 Hearing Sessions. In response, the Inspector asked the Council to provide additional evidence that the anticipated delivery rates of 100dpa were realistic based on the delivery of Kensington sites elsewhere in the Fylde Coast. Unfortunately, the Council has failed to publish this evidence as part of this consultation.
5. In light of this we have reviewed the delivery rates from two other recent Kensington development on the Fylde Coast. This includes the development at Lytham Quay for 102 dwellings in Fylde and the Runnell Farm development for 83 dwellings in Blackpool. Based on the completions data contained within each authorities Housing

¹ Document Ref: EL2.022c

Monitoring Report/Schedule's we set out the build out rates for each site in Table 1 below.

Table 1 - Build Out Rates for Previous Kensington Development

Lytham Quay, Dock Road, Lytham – 102 dwellings	
Year	Completions
2012 - 2013	21 dwellings
2013 - 2014	46 dwellings
2014 – 2015	35 dwellings
Runnell Farm, Blackpool – 83 dwellings	
Year	Completions
2015 – 2016	35 dwellings
2016 – 2017	43 dwellings

6. The two examples in Table 1 demonstrate that, in recent years, Kensington has never achieved close to a build-out rate of 100dpa rather an average of 36dpa, closer to the expected delivery rate assumed for one developer. In the absence of a robust evidential basis that the proposed delivery rates are achievable, it is not unreasonable to amend the output for this site to reflect the built out rates on other Kensington's sites - 36dpa.
7. Based on the Council's methodology and our commentary above, we would expect this site to deliver 18 dwellings in Year 2 and 36 dwellings for the remaining 3 years, a total of 126 dwellings. In total **224 dwellings** should be removed from the supply.

Kingsway Garage, St. Annes (Site Reference – HS13)

8. An outline planning application was submitted in September 2011 for development of 30 sheltered apartments on the site, however, the application is undetermined and the site remains within active use as a garage.
9. Local planning authorities need to provide robust, up to date evidence to support the deliverability of allocated sites, ensuring that their judgements on deliverability are clearly and transparently set out. As the site IS unavailable and does not benefit from planning permission it cannot be considered deliverable in the context of footnote 11 of the NPPF. Furthermore, the Council has also failed to provide any evidence to suggest that the new owners will want to bring this site forward for residential development. As such, **30 dwellings** should be removed from the supply.

SL2 – Fylde Blackpool Periphery Strategic Location for Development

Coastal Dunes, Clifton Drive North, Blackpool Corridor (Site Ref: HSS4)

10. Site HHS4 is owned and controlled by Persimmon Homes. Phases 1 and 2 of the scheme are identified under Policy SL2 of the emerging Local Plan for 351 dwellings. The southern phase of the development, benefits from Reserved Matters permission (App Ref: 14/0392) for 73 dwellings and full permission for 3 bungalows (App Ref:15/0778), totalling 76 dwellings.
11. In a letter submitted in response to the Stage 2 Inspectors Matters, Issues and Questions², Persimmon Homes confirm at paragraph 3(e) that the dwellings numbers and completions contained within the trajectory are incorrect. Persimmon Homes has subsequently confirmed there are around 23 dwellings left to deliver on the first phase of the development not the 34 dwellings stated within the trajectory.
12. Based on the up-to-date information from the developer, 8 dwellings should therefore be removed from the 'planning application commitments' supply for dwellings approved under permission 14/0392 and 15/0778.
13. The original outline consent for 275 dwellings (App Ref: 08/1049) expired on 1st May 2016. Persimmon Homes submitted a full application on the larger, northern part of the site for 353 dwellings in February 2016 and planning permission was granted on 28th March 2017 (App Ref: 16/0062). The approved house types and layouts are solely related to Persimmon Homes and this indicates the site will be brought forward by one developer.
14. Persimmon Homes has confirmed they expect to start on the northern phase of the development immediately and deliver both phases concurrently until the southern phase is completed and then deliver 45dpa on the northern phase.
15. Assuming a 9 month lead in time from when planning permission was granted in March 2017 to discharge conditions and site preparation, completions will begin on the northern phase in January 2018, delivering approximately 8 dwellings in Year 1 of the trajectory. As stated within the trajectory the northern phase will then deliver 45dpa within Years 2, 3, 4 and 5. In total the northern phase of the development is expected to deliver, at most, 178 dwellings, therefore 22 dwellings should be removed from the 'planning application commitments' supply.

² Document Ref: EL6.004

16. Considering the 11 dwellings to be removed from the supply of the southern phase of the site and the 22 dwellings to be removed from the supply of the northern phase of the time. In total **30 dwellings** need to be removed from the supply for Site HSS4.

Cropper Road East, Whitehills (Site Ref: MUS1)

17. Site MUS1 is a proposed allocation under Policy SL2. The site is identified as a mixed-use site that is capable of accommodating 372 dwellings and 6.5 hectares of employment land.

18. The 2017 5YHLSS trajectory splits the site into four parcels relating to different planning application areas. The applications amount to 451 dwellings and it should be noted that the planning permission do not cover the entire MUS1 allocation. The four parcels are broken down as follows:

- Wainhomes - Outline application (App Ref: 12/0707) and Reserved Matters (App Ref: 14/0310) approved in September 2014 for 146 dwellings. This site is under construction.
- I Kershaw (Private Landowner) - Outline planning permission (App Ref: 13/0753) approved for 25 dwellings in July 2015. Development not commenced on site.
- Lancashire County Council – Pending Outline planning application for 200 dwellings (App Ref: 15/0114) submitted in February 2015. Development not commenced.
- Wainhomes – Outline planning permission for 80 dwellings (App Ref: 15/0472) approved in February 2016. Development not commenced.

19. In relation to the land within the control of Wainhomes, at the Stage 2 Hearing Sessions Emery Planning confirmed that the 145 dwelling scheme (App Ref: 14/0310) will deliver the remaining 128 dwellings at a delivery rate of 30dpa over the next five years. They also confirmed that the next phase for 80 dwellings (App Ref: 15/0472) will start delivering homes in year 5 (2021/22).

20. The trajectory at Appendix 2 of the 2017 5YHLSS has been altered to assume delivery in 2021/22, however, it states 30 dwellings will be delivered. This is at odds with the Council's own assumptions at paragraph 12 of the 2017 5YHLSS that sites will only deliver 15 dwellings in their first year of construction. On this basis the supply has been reduced by **15 dwellings**.

Oaklands Caravan Park (Site Ref: HS27)

21. An outline planning application for 53 dwellings (App Ref: 15/0194) on this site was approved at Planning Committee on 6th January 2016. However, 18 months later a Section 106 Agreement is yet to be signed. The site remains in active use as a caravan park and the Council has provided no evidence that the development will come forward within the next five years.
22. As the site does not benefit from planning permissions and is unavailable it does not meet the tests of deliverability outlined at footnote 11 of the NPPF. On the basis of our assessment of this site, the supply has been reduced by **53 dwellings**.

SL4 Kirkham and Wesham

The Pastures, Fleetwood Road, Wesham (Site Ref: HSS8)

23. Site HSS8 is under construction by Rowland Homes and we do not dispute that the site will be deliver housing within the five year period. However, the Council has not provided any robust or up-to-date evidence for the increase in build-out rates from 30dpa (as per the previous 5YHLSS's) to 39 and 38dpa. Rowland Homes has been delivering this site at 30dpa and in the absence of any robust evidence we have applied the previous delivery rate of 30dpa. The supply has therefore, been reduced by **42 dwellings**.

Land North of Blackpool Road, Kirkham (Site Ref: HSS9)

24. The Council has identified that 3 developers will provide the following contributions to the 5YHLS from this site:
1. Story Homes (outline application App Ref: 12/0419 and reserved matters application App Ref: 14/0613) – 117 dwellings;
 2. Barratt Homes (outline application App Ref: 12/0635 and reserved matters application App Ref: 15/0308) – 135 dwellings; and,
 3. Morris Homes (full application App Ref: 15/0177 currently being determined) – 105 dwellings.

25. We do not contest the Council's proposed delivery rates for the Barratt Homes and Morris Homes developments on this site, however, the Housing Trajectory at Appendix 2 of the 2017 5YHLSS suggests that there are 90 dwellings remaining on Story Homes part of the site. As the developer of this site we can confirm that there is in fact 60

dwellings yet to be delivered on the site and therefore, **30 dwellings** should be removed from the supply.

Non-Strategic Locations for Development

Thornfield Caravan Park, Staining (HS41)

26. This site forms an allocation within the Local Plan, however, the site does not benefit from planning permission for residential development and is currently in active use as a caravan park. The site is not available now and it does not meet the tests of deliverability outlined at footnote 11 of the NPPF. The Council has also not provided any robust up-to-date evidence that the site will be deliverable within the next five years, therefore, **10 dwellings** should be removed from the supply.

Newton Hall, School Lane, Newton (Site Ref: HS51)

27. This site forms an allocation within the Local Plan, however, the site does not benefit from planning permission for residential development. The site remains in active use as a farm and planning permission was recently granted for the installation of cover for existing open-topped slurry tower (App Ref: 17/0290) associated to the existing farm use.
28. Local planning authorities must provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. The Council has not provided any evidence whether the landowner stills intends to bring the site forward for residential development and as the site remains in active use as a farm it cannot be considered available now in the context of footnote 11 of the NPPF. **15 dwellings** should be removed from the supply.

Cobweb Barn, Oak Lane, Newton (Site Ref: HS52)

29. The site forms an allocation within the Local Plan, however, it does not benefit from planning permission. Despite the request from the Inspector at the Stage 2 Hearing Sessions, the Council has failed to provide any robust up-to-date evidence that the landowner intends to bring the site forward for residential use within the next five years. Until such time, **15 dwellings** should be removed from the supply.

Singleton Village, Singleton (Site Ref: HS53)

30. The Council has included 15 dwellings within the 5YHLS trajectory for the delivery of dwellings in Singleton Village. The Council has not provided any robust up-to-date

evidence how or where this will be delivered. Until such time this is justified **15 dwellings** should be removed from the supply.

APPENDIX B – FIVE YEAR HOUSING TRAJECTORY

	Site	Site Ref	Planning Application Number	Allocations	Minded to Approve	Planning Application Commitment	Completions	FBC Supply Position					Story Homes Supply Position					Difference		
								2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	5 Year Total	2017-2018	2018-2019	2019-2020	2020-2021		2021-2022	5 Year Total
SL1 - Lytham St. Annes SL1 - Lytham St. Annes																				
Queensway, St Annes	HSS1	08/0058 OL 13/0257 RM 15/400 FUL				1150	0	0	50	100	100	100	350	0	18	36	36	36	126	224
Heyhouses Lane, St Annes	MUS4	12/0465 OL 13/044 RM				162	103	30	29	0	0	0	59	30	29	0	0	0	59	0
Heyhouses Lane, St Annes	MUS4	15/787 OL				160	0	0	15	30	30	30	105	0	15	30	30	30	105	0
Jubilee House, East Beach, Lytham	HS2	13/001 FUL				20	0	15	5	0	0	0	20	15	5	0	0	0	20	0
Ashton Nurseries, Mythop Road,	HS3	07/1264 OL 16/0413 OL	12			0	0	0	0	0	12	0	12	0	0	12	0	12	12	0
The Gables, 35-39 Orchard Road,	HS4	05/0648 FUL 16/0639 FUL		19		0	0	0	15	4	0	0	19	0	15	4	0	0	19	0
Petros House, St Andrews Road North,	HS7	14/0418				35	0	15	20	0	0	0	35	15	20	0	0	0	35	0
23 - 33 Fairhaven Road, St Annes	HS9	14/0320 FUL				32	0	15	17	0	0	0	32	15	17	0	0	0	32	0
34-36 Orchard Road, Lytham St Annes	HS10	15/0176 FUL				12	0	12	0	0	0	0	12	12	0	0	0	0	12	0
The Galleries, 2-4 Kingsway, Lytham	HS11	15/0486 FUL				10	0	10	0	0	0	0	10	10	0	0	0	0	10	0
Fairways, Heeley Road, St Annes	HS12	08/0092 OL			20	0	0	0	15	5	0	20	0	0	15	5	0	0	20	0
Kingsway Garage, St Annes	HS13	11/0667 OL	30			0	0	0	15	15	0	30	0	0	0	0	0	0	30	30
Axa, Lytham	HS14	13/0152 OL		45		0	0	0	15	30	0	45	0	0	15	30	0	45	45	0
Land to the West, Ballam Road, Lytham	HS15	14/0161 FUL		12		0	0	0	9	0	0	9	0	9	0	0	0	9	9	0
Westmoreland House, 29-31 Orchard Road	HS58	16/0285 PA 16/0470 FUL			25	0	0	15	10	0	0	25	15	10	0	0	0	25	25	0
Land to East Sefton Road,	HS59	16/0239 FUL			12	0	12	0	0	0	0	12	12	0	0	0	0	12	12	0
Valentines Kennels, Wildings Lane	HS60	16/0903 OL		53		0	0	0	15	30	8	53	0	0	15	30	8	53	53	0
Land at Roseacre, Wilding Lane,	HS61	16/0061 FUL		45		0	0	0	15	30	0	45	0	15	30	0	0	45	45	0
Dalmeny Hotel	HS65	16/0374 OL		34		0	0	0	15	19	0	34	0	0	15	19	0	34	34	0
Keenans Mill, Lord Street, Lytham St.	HS62	16/0905 OL			26	0	15	11	0	0	0	26	15	11	0	0	0	26	26	0
SL2 - Fylde Blackpool Periphery																				
Coastal Dunes, Clifton Drive North,	HSS4	081049 OL 10/0877 OL 14/0392 RM				76	42	30	1	0	0	31	23	0	0	0	0	23	8	
Coastal Dunes, Clifton Drive North	HSS4	08/1049 FUL 16/0062 FUL	353			0	0	30	45	45	45	210	8	45	45	45	45	188	22	
Land at Lytham St Annes Way, Whitehills	HSS6	13/0726 FUL			26	21	2	0	0	0	0	2	2	0	0	0	0	2	0	
Land at Lytham St Annes Way, Whitehills	HSS6		22		0	0	0	0	0	0	0	15	0	0	0	0	0	15	0	
Cropper Road East, Whitehills	MUS1	12/0717 OL 14/0310 RM			15	17	30	30	30	30	2	122	30	30	30	2	122	122	0	
Cropper Road East, Whitehills	MUS1	13/0753 OL			25	0	0	15	10	0	0	25	0	15	10	0	0	25	0	
Cropper Road East, Whitehills	MUS1	15/0114 OL		265		0	0	0	15	30	30	75	0	0	15	30	30	75	0	
Cropper Road East, Whitehills	MUS1	15/0472 OL 16/0847 RM			80	0	0	0	0	0	30	30	0	0	0	15	15	15	15	
Whyndyke Farm, Preston New Road,	MUS2	11/0221 OL		1310		0	0	0	0	0	15	15	0	0	0	0	15	15	0	
Land to the rear of 23-63 Westgate Road	HS21	08/0992 FUL 12/0499 FUL 16/0194 FUL			25	0	15	10	0	0	0	25	15	10	0	0	0	25	0	
Former Clock Garage, Preston New Road, Westby	HS22	11/0847 OL 15/0891 RM			14	0	0	14	0	0	0	14	0	14	0	0	0	14	0	
Land South of Bridgeside, Squires Gate	HS23	13/0231 FUL			22	0	15	7	0	0	0	22	15	7	0	0	0	22	0	
Spengarth, Cropper Road, Westby		15/0807 OL		14		0	0	0	14	0	0	14	0	0	14	0	0	14	0	
SL3 - Warton SL3 - Warton SL3 - Warton SL3 - Warton																				
Land Opposite Blackfield End Farm, Warton	HSS2	13/674 OL 12/0550 OL			360	0	0	25	50	50	50	175	0	25	50	50	50	175	0	
Highgate Park, Lytham Road, Warton	HSS7	13/0786 RM 15/706 RM			254	63	30	30	30	30	30	150	30	30	30	30	30	150	0	
Riversleigh Farm, Warton	HS24	13/0526RM			82	61	21	0	0	0	0	21	21	0	0	0	0	21	0	
Nine Acres Nursery, Harbour Lane Phase 1	HS25	10/0766 OL			75	66	9	0	0	0	0	9	9	0	0	0	0	9	0	
Georges Garage, Warton	HS26	14/0833 FUL			16	0	15	1	0	0	0	16	15	1	0	0	0	16	0	
Oaklands Caravan Park, 252 Lytham Road, Warton	HS27	15/194 OL			53	0	0	0	15	30	8	53	0	0	0	0	0	53	53	
Land North of Freckleton Bypass, Warton		14/0410 OL			375	0	0	0	0	0	30	30	0	0	0	0	30	30	0	
Clifton House Farm, Lytham Road,		15/0562 OL			115	0	0	0	0	0	15	15	0	0	0	0	15	15	0	
SL4 - Kirkham and Wesham																				
The Pastures, Fleetwood Road,	HSS8	11/0763 OL 14/0041 RM 14/0779 OL 16/0195 FUL			264	72	39	39	38	38	38	192	30	30	30	30	30	150	42	
Land North of Blackpool Road, Kirkham	HSS9	12/0419 OL 14/0613 RM			180	9	30	30	30	0	0	90	30	30	0	0	0	60	30	
Land North of Blackpool Road, Kirkham	HSS9	12/0635 OL			180	9	30	30	30	30	30	150	30	30	30	30	30	150	0	
Land North of Blackpool Road, Kirkham	HSS9	15/0177 FUL	291		0	0	0	0	15	30	30	75	0	0	15	30	30	75	0	
Sunnybank Mill, Kirkham	HS28		31		0	0	0	0	0	15	15	0	0	0	0	15	15	0	0	
Sunnybank Mill, Kirkham	HS28	17/0044 FUL	23		0	0	0	0	15	8	0	23	0	0	15	8	0	23	0	
Pennine View, Weeton Road, Wesham	HS30	13/0364 OL	12		0	0	0	0	0	0	12	12	0	0	0	12	12	12	0	
West End Residential Park, Kirkham	HS32	12/0276 COU		27		0	0	0	15	12	0	27	0	15	12	0	0	27	0	
Land at Brookfarm, Dowbridge, Kirkham (Newton)		15/0547 OL			170	0	0	15	30	30	30	105	0	15	30	30	30	105	0	
Campbells Caravans, Blackpool Road,		16/0112 OL		30		0	0	0	15	15	0	30	0	0	15	15	0	30	0	
Non-Strategic Locations																				
Freckleton																				
The Refuge, Ruskin Road, Freckleton	HS37	13/0262 OL 16/0609 FUL			11	0	11	0	0	0	0	11	11	0	0	0	0	11	0	
Land rear of High Meadows, Lower Lane, Freckleton	HS38			13		0	0	0	0	0	13	13	0	0	0	0	13	13	0	
Quernmore Trading Estate Croft Butts Lane, Freckleton	HS66			10		0	0	0	0	0	10	10	0	0	0	0	0	10	10	
Elswick																				

APPENDIX C – BUS TIMETABLE FOR SERVICE 80 AND 75A

BLACKPOOL - POULTON via Victoria Hospital

74

Monday to Friday



Service Number Notes	74 \$											
BLACKPOOL Abingdon Street	0833	0943	1048	1148	1248	1348	1448	1543	1653	1753	1853	
BLACKPOOL Victoria Hospital	0844	0954	1059	1159	1259	1359	1459	1554	1705	1805	1904	
POULTON Booths	0855	1004	1109	1209	1309	1409	1509	1604	1716	1815	1914	

\$ - Operated on behalf of Lancashire County Council

Saturday

Service Number Notes	74 \$											
BLACKPOOL Abingdon Street	0848	0948	1048	1148	1248	1348	1448	1543	1653	1753	1853	
BLACKPOOL Victoria Hospital	0859	0959	1059	1159	1259	1359	1459	1554	1704	1804	1904	
POULTON Booths	0909	1009	1109	1209	1309	1409	1509	1604	1714	1814	1914	

\$ - Operated on behalf of Lancashire County Council

 Connects at Poulton with Services 75 & 75A for onward travel to Fleetwood and Preston, through tickets are available.

POULTON - BLACKPOOL via Victoria Hospital

74

Monday to Friday



Service Number Notes	74 \$											
POULTON Booths	0807	0916	1021	1121	1221	1321	1421	1521	1623	1723	1831	
BLACKPOOL Victoria Hospital	0817	0926	1031	1131	1231	1331	1431	1531	1633	1733	1841	
BLACKPOOL Abingdon Street	0828	0936	1041	1141	1241	1341	1441	1541	1643	1743	1851	

\$ - Operated on behalf of Lancashire County Council

Saturday

Service Number Notes	74 \$											
POULTON Booths	0821	0921	1021	1121	1221	1321	1421	1521	1621	1721	1826	
BLACKPOOL Victoria Hospital	0831	0931	1031	1131	1231	1331	1431	1531	1631	1731	1836	
BLACKPOOL Abingdon Street	0841	0941	1041	1141	1241	1341	1441	1541	1641	1741	1846	

\$ - Operated on behalf of Lancashire County Council

 Connects at Poulton with Services 75 & 75A for onward travel to Fleetwood and Preston, through tickets are available.

PRESTON - KIRKHAM - POULTON - FLEETWOOD

via Riversway - Newton - Weeton - Singleton - Thornton

PRESTON - KIRKHAM - GT. ECCLESTON - POULTON - FLEETWOOD

via Riversway - Newton - Elswick - Thornton

PRESTON - GT. ECCLESTON - MYERSCOUGH via Ashton - Catforth - Inskip - Elswick 80

75

75A



Monday to Friday

Service Number	75 \$	75A \$	75A \$ CDH	75 \$	75A \$	80 \$	75A \$	80 \$	75A \$	75 \$	80 \$	75A \$	80 \$	75 \$	80 \$
Notes															
Notes															
PRESTON Bus Station	0705	0725	0725	0725	0915	1020	1120	1220	1320	1420	1420	1520	1625	1635	1635
PRESTON Railway Station	0710	0730	0730	0730	0817	0920	1025	1125	1225	1325	1425	1525	1631	1641	1641
PRESTON Riversway Victoria Mansions	0716	0736	0736	0736	0926	1031	1131	1231	1331	1431	1531	1637	1637	1637	1637
ASHTON BANK Chain Caul Way	0719	0739	0739	0739	0929	1034	1134	1234	1334	1434	1534	1641	1641	1641	1641
ASHTON Lane Ends	0823	0823	0823	0823	0923	1031	1131	1231	1331	1431	1531	1647	1647	1647	1647
ASHTON Lea Road	0829	0829	0829	0829	0929	1037	1137	1237	1337	1437	1537	1653	1653	1653	1653
NEWTON Post Office	0724	0744	0744	0744	0934	1039	1139	1239	1339	1439	1539	1647	1647	1647	1647
KIRKHAM Market Square	0731	0751	0751	0751	0941	1046	1146	1246	1346	1446	1546	1654	1654	1654	1654
CATFORTH School Lane End	0839	0839	0839	0839	0939	1046	1146	1246	1346	1446	1546	1702	1702	1702	1702
INSKIP Derby Arms	0844	0844	0844	0844	0944	1051	1151	1251	1351	1451	1551	1707	1707	1707	1707
ELSWICK Ship Hotel	0801	0801	0801	0801	0950	1058	1155	1258	1355	1458	1555	1714	1714	1714	1714
GREAT ECCLESTON Square	0806	0806	0806	0806	0955	1103	1200	1303	1400	1503	1600	1719	1719	1719	1719
MYERSCOUGH Agricultural College	0910	0910	0910	0910	1115	1115	1315	1315	1515	1515	1731	1731	1731	1731	1731
WEETON Eagle & Child	0741	0741	0741	0741	0950	1056	1156	1256	1356	1456	1556	1704	1704	1704	1704
WEETON Camp	0746	0746	0746	0746	0955	1101	1201	1301	1401	1501	1601	1709	1709	1709	1709
SINGLETON Fire Station	0751	0751	0751	0751	0900	1106	1206	1306	1406	1506	1606	1714	1714	1714	1714
POULTON Booths arr.	0757	0821	0821	0821	0907	1112	1212	1312	1412	1512	1612	1721	1721	1721	1721
POULTON Booths dep.	0700	0800	0821	0821	0910	1115	1215	1315	1415	1515	1615	1726	1726	1726	1726
BLACKPOOL Sixth Form College	0831	0831	0831	0831	0931	1131	1231	1331	1431	1531	1631	1742	1742	1742	1742
LITTLE THORNTON Hornby's Corner	0706	0806	0806	0806	0916	1121	1221	1321	1421	1521	1621	1732	1732	1732	1732
THORNTON Four Lane Ends	0711	0811	0811	0811	0921	1126	1226	1326	1426	1526	1626	1737	1737	1737	1737
CALA GRAN Holiday Centre	0716	0817	0817	0817	0926	1131	1231	1331	1431	1531	1631	1747	1747	1747	1747
FLEETWOOD Windward Avenue	0721	0822	0822	0822	0931	1136	1236	1336	1436	1536	1636	1742	1742	1742	1742
FLEETWOOD Asda	0726	0828	0828	0828	0936	1141	1241	1341	1441	1541	1641	1752	1752	1752	1752
FLEETWOOD Albert Square	0728	0831	0831	0831	0938	1143	1243	1343	1443	1543	1643	1754	1754	1754	1754

PRESTON - KIRKHAM - POULTON - FLEETWOOD

via Riversway - Newton - Weeton - Singleton - Thornton

PRESTON - KIRKHAM - GT. ECCLESTON - POULTON - FLEETWOOD

via Riversway - Newton - Elswick - Thornton

PRESTON - GT. ECCLESTON - MYERSCOUGH via Ashton - Catforth - Inskip - Elswick 80

75

75A



Monday to Friday

Service Number	75A \$	75 \$	80 \$	75A \$
PRESTON Bus Station	1735	1825	1835	1930
PRESTON Railway Station	1741	1830	1840	1935
PRESTON Riversway Victoria Mansions	1747	1836	1941
ASHTON BANK Chain Caul Way	1752	1839	1944
ASHTON Lane Ends	1846
ASHTON Lea Road	1852
NEWTON Post Office	1757	1844	1949
KIRKHAM Market Square	1804	1851	1956
CATFORTH School Lane End	1901
INSKIP Derby Arms	1906
ELSWICK Ship Hotel	1813	1913	2005
GREAT ECCLESTON Square	1818	1918	2009
MYERSCOUGH Agricultural College	1930
WEETON Eagle & Child	1901
WEETON Camp	1906
SINGLETON Fire Station	1911
POULTON Booths arr.	1830	1917
POULTON Booths dep.	1833	1922
LITTLE THORNTON Hornby's Corner	1839	1928
THORNTON Four Lane Ends	1844	1933
CALA GRAN Holiday Centre	1849	1938
FLEETWOOD Windward Avenue	1854	1943
FLEETWOOD Asda	1859	1948
FLEETWOOD Albert Square	1901	1950

1009

Connects at Poulton with Service 74 for onward travel to Victoria Hospital and Blackpool, through tickets are available.

\$ - Operated on behalf of Lancashire County Council
 CD - College Days Only
 CDH - College Holidays

75

PRESTON - KIRKHAM - POULTON - FLEETWOOD

via Riversway - Newton - Weeton - Singleton - Thornton

PRESTON - KIRKHAM - GT. ECCLESTON - POULTON - FLEETWOOD

via Riversway - Newton - Elswick - Thornton

PRESTON - GT. ECCLESTON - MYERSCOUGH via Ashton - Catforth - Inskip - Elswick 80



Saturday

Service Number	75 \$	75A \$	75 \$	80 \$	75A \$	75 \$	80 \$	75A \$	75 \$	80 \$	75A \$	75 \$	80 \$	75A \$	75 \$
PRESTON Bus Station	0720	0820	0820	0920	1020	1120	1220	1320	1420	1420	1520	1630	1635	1735	1825
PRESTON Railway Station	0725	0825	0825	0925	1025	1125	1225	1325	1425	1425	1525	1635	1640	1740	1830
PRESTON Riversway Victoria Mansions	0731	0831	0831	0931	1031	1131	1231	1331	1431	1431	1531	1641	1641	1746	1836
ASHTON BANK Chain Caul Way	0734	0834	0834	0934	1034	1134	1234	1334	1434	1434	1534	1644	1644	1749	1839
ASHTON Lane Ends	0831	0831	0831	0831	1031	1131	1231	1331	1431	1431	1531	1641	1646	1746	1836
ASHTON Lea Road	0837	0837	0837	0837	1037	1137	1237	1337	1437	1437	1537	1647	1652	1752	1842
NEWTON Post Office	0739	0839	0839	0939	1039	1139	1239	1339	1439	1439	1539	1649	1649	1754	1844
KIRKHAM Market Square	0746	0846	0846	0946	1046	1146	1246	1346	1446	1446	1546	1656	1656	1801	1851
CATFORTH School Lane End	0846	0846	0846	0846	1046	1146	1246	1346	1446	1446	1546	1656	1656	1701	1851
INSKIP Derby Arms	0851	0851	0851	0851	1051	1151	1251	1351	1451	1451	1551	1661	1661	1706	1856
ELSWICK Ship Hotel	0755	0855	0855	0955	1055	1155	1255	1355	1455	1455	1555	1665	1665	1713	1810
GREAT ECCLESTON Square	0800	0900	0900	1000	1100	1200	1300	1400	1500	1500	1600	1710	1710	1718	1815
MYERSCOUGH Agricultural College	0915	0915	0915	0915	1115	1215	1315	1415	1515	1515	1615	1725	1725	1730	1825
WEETON Eagle & Child	0856	0856	0856	1056	1156	1256	1356	1456	1556	1556	1656	1766	1766	1901	1901
WEETON Camp	0901	0901	0901	0901	1101	1201	1301	1401	1501	1501	1601	1711	1711	1906	1906
SINGLETON Fire Station	0906	0906	0906	0906	1106	1206	1306	1406	1506	1506	1606	1716	1716	1911	1911
POULTON Booths arr.	0812	0912	0912	1012	1112	1212	1312	1412	1512	1512	1612	1722	1722	1827	1917
POULTON Booths dep.	0715	0815	0815	0915	1015	1115	1215	1315	1415	1415	1515	1625	1625	1830	1920
LITTLE THORNTON Hornby's Corner	0721	0821	0821	0921	1021	1121	1221	1321	1421	1421	1521	1631	1631	1836	1926
THORNTON Four Lane Ends	0726	0826	0826	0926	1026	1126	1226	1326	1426	1426	1526	1636	1636	1841	1931
CALA GRAN Holiday Centre	0731	0831	0831	0931	1031	1131	1231	1331	1431	1431	1531	1641	1641	1846	1936
FLEETWOOD Windward Avenue	0736	0836	0836	0936	1036	1136	1236	1336	1436	1436	1536	1646	1646	1851	1941
FLEETWOOD Asda	0741	0841	0841	0941	1041	1141	1241	1341	1441	1441	1541	1651	1651	1856	1946
FLEETWOOD Albert Square	0743	0843	0843	0943	1043	1143	1243	1343	1443	1443	1543	1653	1653	1858	1948

1010

PRESTON - KIRKHAM - POULTON - FLEETWOOD 75
 via Riversway - Newton - Weeton - Singleton - Thornton
PRESTON - KIRKHAM - GT. ECCLESTON - POULTON - FLEETWOOD 75A
 via Riversway - Newton - Elswick - Thornton
PRESTON - GT. ECCLESTON - MYERSCOUGH via Ashton - Catforth - Inskip - Elswick 80



Saturday

Service Number	80	75A
Notes	\$	\$
PRESTON Bus Station	1835	1930
PRESTON Railway Station	1840	1935
PRESTON Riversway Victoria Mansions	1941
ASHTON BANK Chain Caul Way	1944
ASHTON Lane Ends	1846
ASHTON Lea Road	1852
NEWTON Post Office	1949
KIRKHAM Market Square	1956
CATFORTH School Lane End	1901
INSKIP Derby Arms	1906
ELSWICK Ship Hotel	1913	2005
GREAT ECCLESTON Square	1918	2009
MYERSCOUGH Agricultural College	1930

1011



Connects at Poulton with
 Service 74 for onward travel to
 Victoria Hospital and Blackpool,
 through tickets are available.

\$ - Operated on behalf of Lancashire County Council

FLEETWOOD - POULTON - KIRKHAM - PRESTON

75

via Thornton - Singleton - Weeton - Newton - Riversway

FLEETWOOD - POULTON - GT. ECCLESTON - KIRKHAM - PRESTON

75A

via Thornton - Elswick - Newton - Riversway

MYERSCOUGH - GT. ECCLESTON - PRESTON via Elswick - Inskip - Catforth - Ashton 80



Monday to Friday

Service Number Notes	75		80		75A		75	
	\$	\$	\$	\$	\$	\$	\$	
FLEETWOOD Asda	1641	1752	1857	1752	1857
FLEETWOOD Albert Square	1648	1758	1903	1758	1903
FLEETWOOD Windward Avenue	1653	1803	1908	1803	1908
CALA GRAN Holiday Centre	1658	1808	1913	1808	1913
THORNTON Four Lane Ends	1704	1814	1919	1814	1919
LITTLE THORNTON Hornbys Corner	1708	1818	1923	1818	1923
POULTON Booths arr.	1717	1825	1930	1825	1930
POULTON Booths dep.	1722	1828	1828
SINGLETON Fire Station	1734
WEETON Camp	1738
WEETON Eagle & Child	1743
MYERSCOUGH Agricultural College	1735
GREAT ECCLESTON Square	1747	1842	1747	1842
ELSWICK Ship Hotel	1752	1847	1752	1847
INSKIP Derby Arms	1759	1759
CATFORTH School Lane End	1803	1803
KIRKHAM Market Square	1753	1859	1753	1859
NEWTON Post Office	1759	1905	1759	1905
ASHTON Lea Road	1811	1811
ASHTON Lane Ends	1817	1817
ASHTON BANK Chain Caul Way	1804	1910	1804	1910
PRESTON Riversway Victoria Mansions	1807	1913	1807	1913
PRESTON Opp Railway Station	1812	1823	1918	1812	1823	1918
PRESTON Bus Station	1818	1829	1924	1818	1829	1924

1013



Connects at Poulton with Service 74 for onward travel to Victoria Hospital and Blackpool, through tickets are available.

\$ - Operated on behalf of Lancashire County Council
 CD - College Days Only
 CDH - College Holidays

FLEETWOOD - POULTON - KIRKHAM - PRESTON

via Thornton - Singleton - Weeton - Newton - Riversway

FLEETWOOD - POULTON - GT. ECCLESTON - KIRKHAM - PRESTON

via Thornton - Elswick - Newton - Riversway

MYERSCOUGH - GT. ECCLESTON - PRESTON via Elswick - Inskip - Catforth - Ashton

75

75A

Saturday



Service Number	75	80	75	75	75	80	75A	75	80	75A	75	80	75A	75	80	75	80
Notes	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
FLEETWOOD Asda	0711	0741	0841	...	0941	1041	...	1141	1241	...	1341	1441	...	1541	1641
FLEETWOOD Albert Square	0718	0748	0848	...	0948	1048	...	1148	1248	...	1348	1448	...	1548	1648
FLEETWOOD Windward Avenue	0723	0753	0853	...	0953	1053	...	1153	1253	...	1353	1453	...	1553	1653
CALA GRAN Holiday Centre	0728	0758	0858	...	0958	1058	...	1158	1258	...	1358	1458	...	1558	1658
THORNTON Four Lane Ends	0734	0804	0904	...	1004	1104	...	1204	1304	...	1404	1504	...	1604	1704
LITTLE THORNTON Hornbys Corner	0738	0808	0908	...	1008	1108	...	1208	1308	...	1408	1508	...	1608	1708
POULTON Booths arr.	0745	0815	0915	...	1015	1115	...	1215	1315	...	1415	1515	...	1615	1715
POULTON Booths dep.	0638	...	0748	...	0918	...	1018	1118	...	1218	1318	...	1418	1518	...	1618	1718
SINGLETON Fire Station	0650	...	0800	...	0930	...	1130	1330	1530	1730	...
WEETON Camp	0654	...	0804	...	0934	...	1134	1334	1534	1734	...
WEETON Eagle & Child	0659	...	0809	...	0939	...	1139	1339	1539	1739	...
MYERSCOUGH Agricultural College	0720	0920	1120	1320	...	1520	...	1735
GREAT ECCLESTON Square	0732	0932	1032	...	1132	1232	...	1332	1432	...	1532	1632
ELSWICK Ship Hotel	0737	0937	1037	...	1137	1237	...	1337	1437	...	1537	1637
INSKIP Derby Arms	0744	0944	1144	1344	...	1544	...	1759
CATFORTH School Lane End	0748	0948	1148	1348	...	1548	...	1803
KIRKHAM Market Square	0709	...	0819	...	0949	...	1049	1149	...	1249	1349	...	1449	1549	...	1649	1749
NEWTON Post Office	0715	...	0825	...	0955	...	1055	1155	...	1255	1355	...	1455	1555	...	1655	1755
ASHTON Lea Road	0756	0956	1156	1356	...	1556	...	1811
ASHTON Lane Ends	0802	1002	1202	1402	...	1602	...	1817
ASHTON BANK Chain Caul Way	0720	...	0830	...	1000	...	1100	1200	...	1300	1400	...	1500	1600	...	1700	1800
PRESTON Riversway Victoria Mansions	0723	...	0833	...	1003	...	1103	1203	...	1303	1403	...	1503	1603	...	1703	1803
PRESTON Opp Railway Station	0728	0808	0838	...	1008	1008	1108	1208	1208	1308	1408	1408	1508	1608	1608	1708	1808
PRESTON Bus Station	0734	0814	0844	...	1014	1014	1114	1214	1214	1314	1414	1414	1514	1614	1614	1714	1829

1014

FLEETWOOD - POULTON - KIRKHAM - PRESTON **75**
 via Thornton - Singleton - Weeton - Newton - Riversway
FLEETWOOD - POULTON - GT. ECCLESTON - KIRKHAM - PRESTON **75A**
 via Thornton - Elswick - Newton - Riversway
MYERSCOUGH - GT. ECCLESTON - PRESTON via Elswick - Inskip - Catforth - Ashton **80**



Saturday

Service Number	75A	75
Notes	\$	\$
FLEETWOOD Asda	1751	1856
FLEETWOOD Albert Square	1758	1903
FLEETWOOD Windward Avenue	1803	1908
CALA GRAN Holiday Centre	1808	1913
THORNTON Four Lane Ends	1814	1919
LITTLE THORNTON Hornbys Corner	1818	1923
POULTON Booths arr.	1825	1930
POULTON Booths dep.	1828
GREAT ECCLESTON Square	1842
ELSWICK Ship Hotel	1847
KIRKHAM Market Square	1859
NEWTON Post Office	1905
ASHTON BANK Chain Caul Way	1910
PRESTON Riversway Victoria Mansions	1913
PRESTON Opp Railway Station	1918
PRESTON Bus Station	1924

1015



Connects at Poulton with
 Service 74 for onward travel to
 Victoria Hospital and Blackpool,
 through tickets are available.

\$ - Operated on behalf of Lancashire County Council



SERVICE 74 ROUTE DESCRIPTION **1016**

From BLACKPOOL Abingdon Street via Talbot Road, Grange Road, St.Walburga's Road, Whinney Heys Road, BLACKPOOL Victoria Hospital Terminus, Whinney Heys Road, Whinpark Avenue, North Park Drive, St.Walburga's Road, Poulton Road, Garstang Road West, POULTON, Hardhorn Road, New Link Road and

Blackpool Old Road to POULTON Booths.

Returning from POULTON Booths via Blackpool Old Road, Hardhorn Road, Garstang Road West, BLACKPOOL, Poulton Road, St.Walburga's Road, Whinney Heys Road, BLACKPOOL Victoria Hospital Terminus, Whinney Heys Road, Whinpark Avenue, North Park Drive, St.Walburga's Road, Grange Road, Talbot Road and Clifton Street to BLACKPOOL Abingdon Street.



SERVICE 75 ROUTE DESCRIPTION

From PRESTON Bus Station via Lord Street, Lancaster Road, Fishergate, Fishergate Hill, Hartington Road, Portway, Navigation Way, ASHTON BANK, Chain Caul Way, Nelson Way, ASHTON, Riversway, A583 Blackpool Road, NEWTON, School Lane, Bryning Lane, A583 Blackpool Road, Blackpool Road, KIRKHAM, Dowbridge,

Market Square, Poulton Street, Moor Street, Ribby Road, A583 Blackpool Road, GREAT PLUMPTON, Weeton Road, WEETON, Church Road, Mythop Road, Singleton Road, circle Weeton Camp, B5260, SINGLETON, Weeton Road, The Village, Station Road, HARDHORN, Fairfield Road, POULTON, Hardhorn Road, New Link Road, Blackpool Old Road, POULTON Booths, Blackpool Old Road, Queens Square, Chapel Street, Breck Road, Skippool Road, LITTLE THORNTON, Tarn Road, School Road, THORNTON, Station Road, Victoria Road East, Fleetwood Road, Fleetwood Road North, Fleetwood Road, Amounderness Way, FLEETWOOD, Windward Avenue*, circle the green, Windward Avenue*, Amounderness Way and Dock Street to FLEETWOOD Asda.

Returning from FLEETWOOD Asda via Dock Street, Adelaide Street, Albert Square, Lord Street, Station Road, Amounderness Way then outward route reversed to POULTON Breck Road then via Station Road, Vicarage Road, Ball Street, Tithebarn Street, Queensway, Blackpool Old Road to POULTON Booths then via Blackpool Old Road, Queens Square, Hardhorn Road then outward route reversed to NEWTON A583 Blackpool Road then via School Lane, Bryning Lane, A583 Blackpool Road then outward route reversed to PRESTON Fishergate Hill then via Corporation Street, Ringway and Tithebarn Street to PRESTON Bus Station.

* - Hail and Ride applies on these roads and all rural roads when there are no bus stops.



SERVICE 75A ROUTE DESCRIPTION

From PRESTON Bus Station via Lord Street, Lancaster Road, Fishergate, Fishergate Hill, Hartington Road, Portway, Navigation Way, ASHTON BANK, Chain Caul Way, Nelson Way, ASHTON, Riversway, A583 Blackpool Road, NEWTON, School Lane, Bryning Lane, A583 Blackpool Road, Blackpool Road, KIRKHAM, Dowbridge,

Market Square, Poulton Street, Station Road, WESHAM, Garstang Road North, Fleetwood Road, A585, unclassified road, THISTLETON Village, Thistleton Road, ELSWICK, High Street, Copp Lane, GREAT ECCLESTON, Eckonby Street, High Street, Raikes Road, Garstang Road, A586, Garstang New Road, LITTLE SINGLETON, Garstang Road East, POULTON, Hardhorn Road, New Link Road, Blackpool Old Road to POULTON Booths then as Service 75 route to FLEETWOOD Asda.

Returning from FLEETWOOD Asda via Service 75 return route to to POULTON Booths then via Blackpool Old Road, Queens Square, Hardhorn Road then outward route reversed to NEWTON A583 Blackpool Road then via School Lane, Bryning Lane, A583 Blackpool Road then outward route reversed to PRESTON Fishergate Hill then via Corporation Street, Ringway and Tithebarn Street to PRESTON Bus Station.

Variation to Route:

Service 75A journeys to/from BLACKPOOL Sixth Form College.

From POULTON Booths via Blackpool Old Road, Hardhorn Road, New Link Road and Blackpool Old Road to BLACKPOOL Sixth Form College.

Returning from BLACKPOOL Sixth Form College via Blackpool Old Road to POULTON Booths.



SERVICE 80 ROUTE DESCRIPTION

From PRESTON Bus Station via Lord Street, Lancaster Road, Fishergate, Bow Lane, Marsh Lane, Leighton Street, Maudland Bank, Pedder Street, Ashton Street, Fyde Road, Tulketh Brow, ASHTON, Blackpool Road, Lea Road, BARTLE, Sidgreaves Lane, CATFORTH Rosemary Lane, Catforth Road, INSKIP, Preston Road,

B5269, Lodge Lane, ELSWICK, High Street, Ash Road, Beech Road, High Street, Copp Lane, GREAT ECCLESTON, Eckonby Street, High Street, Raikes Road, Garstang Road, A586, ST. MICHAEL'S, Blackpool Road, Hall Lane and St.Michael's Road to MYERSCOUGH Agricultural College.

Returning from MYERSCOUGH Agricultural College via outward route reversed to PRESTON Ashton Street then via Wellfield Road, Marsh Lane, Bow Lane, Fishergate, Corporation Street, Ringway and Tithebarn Street to PRESTON Bus Station.

* - Hail and Ride applies on these roads and all rural roads when there are no bus stops.

About this leaflet

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The 24 hour clock

This leaflet has been published by Lancashire County Council and contains details of bus services on the routes shown on the front cover.

On Bank Holidays many bus companies revise their services, it is advisable to contact

TRAVELINE on 0871 200 22 33, your local Information Outlet or the operator of the service for full details before travelling.

Every effort has been made to ensure the accuracy of this leaflet, however Lancashire County Council are not able to accept any responsibility for inaccuracy.

What if the service changes?

In the event of a service change an amendment sheet or new leaflet will be published.

Journeys marked with a \$ sign in the timetable are paid for, and operated, on behalf of Lancashire County Council.

Times shown in this leaflet are in the 24 hour clock. After midday times may be converted to the 12 hour clock as follows:

1200 - 12 noon	1800 - 6pm
1300 - 1pm	1900 - 7pm
1400 - 2pm	2000 - 8pm
1500 - 3pm	2100 - 9pm
1600 - 4pm	2200 - 10pm
1700 - 5pm	2300 - 11pm

How to get more information

A comprehensive information service for all Lancashire's local bus & rail network is available from your local **INFORMATION OUTLET** or by writing to:

**Public Transport
Passenger and Integrated Transport
Lancashire County Council
PO Box 100
County Hall
Preston PR1 0LD
timetableorders@lancashire.gov.uk**

If you have difficulty reading this timetable, larger print copies are available by writing to the address above.

PASSENGERS ARE ADVISED TO CHECK TIMES BEFORE TRAVELLING



Bus Users
Working for passengers

If you have a problem on a bus journey, please let the bus company know first. If you don't feel they have resolved it to your satisfaction, Bus Users UK, an independent organisation that represents bus passengers, may be able to help.

Email, telephone or write to them giving them as much detail as you can. They will take things further for you. If they can't resolve it, they are partners in the Bus Appeals Body who will issue a decision about your difficulty.

Bus Users UK, Terminal House,
Shepperton TW17 8AS
Telephone: 0300 111 0001

Email: enquiries@bususers.org

Website: www.bususers.org

Changes to the timetable since the last edition

Lancashire County Council has revised the tendered bus service network in Wyre and Fylde. These revisions will maintain public transport service links for Elswick and Great Eccleston, following the withdrawal of Service 78 from this area, whilst reinstating the hourly Monday to Saturday daytime service between Fleetwood, Poulton, Kirkham and Preston with connections to Blackpool and Victoria Hospital, as summarised below:

SERVICE 74

Route and timetable revised, adjusting the service to operate between Poulton and Blackpool only. The service maintains a timed connection with Services 75 & 75A from Fleetwood and Thornton and also provides timed connections from the eastern side of the routes (between Preston and Poulton) for journeys to Victoria Hospital and Blackpool.

The service operates every hour Monday to Saturday daytime.

SERVICE 75

Route and timetable revised, adjusting the route between Fleetwood and Thornton serving Windward Avenue estate to utilise developer funding to provide a service for this area.

The service operates every two hours Monday to Saturday daytime. In conjunction with Service 75A, a combined hourly service has been provided on the following sections:

- between Fleetwood, Thornton and Poulton on the same route;
- between the end to end key destinations of Fleetwood, Poulton, Kirkham and Preston;
- between Kirkham, Riversway and Preston on the same route.

In revising the route to serve Windward Avenue, the section of Pheasants Wood, Tennyson Avenue and Marsh Road in Thornton will no longer be able to be served. Catch22bus Ltd's commercial bus Service 23 has been revised to serve these areas providing the link with Cleveleys, Thornton and Poulton centres as well as Victoria Hospital.

The revision of the tendered bus service route between Fleetwood and Poulton improves overall service reliability, whilst maintaining a connection for the wider Thornton community for links to Fleetwood, Poulton, Victoria Hospital, Blackpool and Preston.

SERVICE 75A

Service introduced to retain the existing level of service between Fleetwood, Thornton and Poulton on the same route as the revised Service 75, and also maintain public transport service links between Elswick and Great Eccleston with Kirkham and Poulton, following the withdrawal of Service 78 from these areas.

The service operates every two hours Monday to Saturday daytime. In conjunction with the Service 75, a combined hourly service has been provided on the following sections:

- between Fleetwood, Thornton and Poulton on the same route;
- between the end to end key destinations of Fleetwood, Poulton, Kirkham and Preston;
- between Kirkham, Riversway and Preston on the same route.

A single am & pm journey extends on college days to serve Blackpool Sixth Form College

SERVICE 80

Route and timetable revised, adjusting the route between Ashton and Preston to serve the Maudland Bank area. This maintains the link to Preston Railway Station whilst avoiding duplicating Service 75A through Riversway and other commercial bus services on Fylde Road.

The service continues to operate every two hours Monday to Saturday daytime. In conjunction with the Service 75A, a combined hourly service has been provided between the end to end key destinations of Great Eccleston, Elswick and Preston.

Changes to the timetable since the last edition.

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See inside back cover for details of changes.
(Replaces leaflet dated 5 September 2016).

Bus services are run in accordance with the operators conditions of carriage. For full details, complaints and lost property enquiries please contact the operator of the service.

Rotala Preston Bus
221 Deepdale Road
Preston
PR1 6NY
Tel. 01772 253671

National Rail Enquiries

08457 484950

Travel Information on the Net

www.lancashire.gov.uk



traveline
public transport info

0871 200 22 33

Calls cost 12p per minute plus your
phone company's access charge

www.traveline.info

open 7 days a week

RNID Tynetalk Textphone users can
dial 18001 then 0871 200 22 33 for a
tynetalk assisted call

Detailed information on public transport can be obtained from:

ACCRINGTON BUS STATION King Street	NELSON INTERCHANGE Broadway
BURNLEY Bus Station	ORMSKIRK LIBRARY Burscough Street
CARNFORTH CONNECT Carnforth Station	PRESTON Bus Station
CHORLEY INTERCHANGE Clifford Street	RAWTENSTALL LIBRARY & INFORMATION SERVICE Queen's Square, Haslingden Road
CLITHEROE INTERCHANGE Railway View Road	SKELMERSDALE LIBRARY & INFORMATION SERVICE Southway
FLEETWOOD LIBRARY AND INFORMATION SERVICE North Albert Street	For details about bus services in Blackburn please contact: BLACKBURN VISITOR CENTRE Blackburn Market, Church Street
LEYLAND LIBRARY AND INFORMATION SERVICE Lancastergate	For details about bus services in Blackpool please contact: BLACKPOOL TRANSPORT TRAVEL OFFICES Market Street, Blackpool and Rigby Road, Blackpool
MORECAMBE Tourist Information Centre, Station Buildings, Marine Road	

APPENDIX D – COMMITTEE REPORT – LAND NORTH OF MILL LANE, ELSWICK

Item Number: 4

Committee Date: 26 July 2017

Application Reference:	17/0247	Type of Application:	Outline Planning Permission
Applicant:	Story Homes	Agent :	
Location:	LAND NORTH OF MILL LANE, ELSWICK		
Proposal:	OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT OF UP TO 50 DWELLINGS (ACCESS APPLIED FOR WITH ALL OTHER MATTERS RESERVED)		
Parish:		Area Team:	Area Team 2
Weeks on Hand:	17	Case Officer:	Rob Buffham
Reason for Delay:	Need to determine at Committee		

If viewing online this is a Google Maps link to the general site location:

<https://www.google.co.uk/maps/@53.8390524,-2.8769983,680m/data=!3m1!1e3?hl=en>

Summary of Recommended Decision: Approve Subj 106

Summary of Officer Recommendation

The proposal for consideration by Members is an outline application (access) for up to 50 dwellings, on land north of Mill Lane, Elswick, and is an identical resubmission of a previously refused scheme by Members of the February 2017 Planning Committee.

The development falls outside the settlement boundary of Elswick, representing encroachment into the countryside and is therefore contrary to Policies SP2 of the Fylde Borough Local Plan (FBLP) and GD4 of the Submission Version Fylde Local Plan (SV), which act to restrict development within such areas to agriculture, horticulture, forestry or other uses appropriate to a rural area only.

The most recent adopted 5 Year Housing Supply figure was a 4.8 year supply as of 31st March 2016. The supply figure has been revised for the Public Examination of the SV and demonstrates a 5.1 year supply, though this figure is subject to further public consultation during the summer and is yet to be tested by the Public Examination.

Elswick is designated as a Tier 2 Rural Settlement in the SV, capable of sustainably accommodating 50 dwellings over the plan period. When added to committed development this proposal would exceed the 50 unit target by 46 units. Like the supply figure, the Tier 2 designation of Elswick is to be scrutinised at the Public Examination and may change. Moderate weight should therefore be applied to the interim housing supply position and Tier 2 status of Elswick. It is also considered that sustainable housing development should be supported in order to maintain a 5 year supply, irrespective of location, as failure to do so would increase risk of the Council not being able to demonstrate a 5 year supply in the future.

Due to the moderate weight applicable to both the revised housing supply figure and emerging policies of the SV, it is considered that policies of the NPPF with particular regards

to sustainable development should prevail. Therefore, the principle of housing development should not be resisted in the Countryside Area providing that it is sustainable in all other respects and that no other demonstrable harm would arise as a result.

The proposed development would result in an expansion of the village in the order of approximately 11% (21% when including committed development) in a location on the edge of the settlement boundary which relates well to the existing built-up edge of Elswick and existing shops, services, and public transport facilities. Nor would it have any significant adverse effects on landscape character and appropriate mitigation can be introduced as part of the scheme in order to minimise impact. The development would not result in any significant loss of the Borough's best and most versatile agricultural land and there are no other landscape designations to restrict its development for housing.

The development provides for satisfactory access to the site and there is sufficient capacity to ensure that the level of traffic generated by the development would not have a severe impact on the safe and efficient operation of the surrounding highway network. The scheme would result in an acceptable relationship with surrounding uses and appropriate mitigation can be provided to ensure that the development would have no adverse impacts in terms of ecology, flooding and drainage. The proposal would not affect the significance of any heritage assets in the locality and appropriate contributions would be secured to make the development acceptable in planning terms.

On balance, it is considered that the benefits arising as a result of the development would outweigh the limited harm which has been identified in visual and landscape terms having particular regard to the requirements of the FBLP, SV and NPPF.

Notwithstanding the previously refused application, the officer recommendation is that Members support the application, subject to condition and a legal agreement to secure affordable housing, contributions to secondary education provision and bus service enhancements.

Reason for Reporting to Committee

The application is a major development which is recommended for approval by Officers. In accordance with the Councils adopted Scheme of Delegation the application must therefore be referred to the Development Management Committee for determination.

Members will recall an identical submission being refused at the February 2017 Planning Committee, for the following reasons:

1. The development of the site for up to 50 dwellings will, in combination with recent planning approvals, result in a level of development in Elswick that will exceed that assumed in the emerging Fylde Local Plan, which is at an advanced stage of preparation, and identified Elswick as a tier 2 settlement expected to support only limited expansion. In the absence of any significant community facilities within the village and a limited public transport service in the village, the proposal would result in increased journeys by private motor vehicle and so would be economically, socially and environmentally unsustainable and contrary to the provisions of Policy S1 of the emerging Fylde Local Plan to 2032.

And,

2. Lack of mechanism for the provision of affordable housing, education and bus service

enhancement contributions.

This refusal has been appealed, with the Hearing date scheduled for 30 August 2017.

Site Description and Location

The application site is adjacent to the eastern boundary of Elswick, being bound by housing to the west on Linden Fold/ Ash Close, two dwellings to the south on Lodge Lane/ Mill Lane, and farm holdings to the north on Bond Lane and east. The site is 4.7 hectares in size and is almost rectangular in form, comprising of a relatively flat, grassed parcel of land with centrally located pond. Trees, hedgerow and residential fencing define the current site boundaries.

The site is designated as Countryside in the adopted Fylde Borough Local Plan (FBLP) and Submission Version of the Fylde Local Plan 2032 (SV).

Details of Proposal

The proposal is identical to that previously refused by Members of the Planning Committee, with Outline planning consent being sought for up to 50 dwellings on the site, seeking approval of vehicular access arrangements only. Detail relating to appearance, landscaping, layout and scale are to be assessed through subsequent reserved matters application(s).

The submission indicates that the sole vehicular access to the development will be via a new access road to the north of Mill Lane. This proposed arrangement will result in a change of priority with vehicles using the access road having priority over those vehicles using the existing Mill Lane carriageway. A pedestrian access is provided to Bonds Lane.

The submitted indicative layout does not provide a detailed plot layout, instead highlights development blocks of housing which are sited adjacent to the eastern edge of the village envelope. A landscape buffer and Public Open Space area wrap around the defined housing area and centrally located pond and land to the south of the housing area will also be landscaped as an 'Arrival Impact Green'. The road layout encourages housing to be generally outward facing where opposing the countryside boundaries of the site. The Planning Statement refers to scale of buildings being 2 storey, though the Design and Access Statement refers to housing being predominantly 2 – 2.5 storeys in height, designed with an ethos of a modern version of traditional suburban architecture similar to that in the locality.

Relevant Planning History

Application No.	Development	Decision	Date
16/0180	OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT OF UP TO 50 DWELLINGS AND ASSOCIATED INFRASTRUCTURE (ACCESS APPLIED FOR WITH ALL OTHER MATTERS RESERVED)	Refused	10/02/2017

Relevant Planning Appeals History

16/0180	OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT OF UP TO 50 DWELLINGS AND ASSOCIATED INFRASTRUCTURE (ACCESS APPLIED FOR WITH ALL OTHER MATTERS RESERVED)	Ongoing
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Parish/Town Council Observations

Elswick Parish Council notified on 30 March 2017 and comment that the application should be refused, based on their objection to the previous application (16/0180) and the following additional comments:

- Examination of the emerging Local Plan has already commenced and the Parish Council feels it would be prudent to await the outcome of this.
- Five Year Housing Land Supply – the covering letter submitted by the applicants agent notes the “Applicant’s concerns regarding the Council’s ability to demonstrate a robust five year housing land supply”. However, Fylde Borough Councils 5.58 year housing supply land statement should be used to decipher applications unless this figure changes.
- There appear to be discrepancies within the Accessibility and Availability of Services statements, for example:
 - There is a convenience store in Elswick - this is a small newsagent with a limited supply of groceries.
 - There is only one place of worship – not three
 - There is not a primary school in Elswick
 - There is not a takeaway in Elswick
 - The restaurant in Elswick closed down last year.
 - Whilst there are some facilities in Great Eccleston, the walking distance is over 1.5 miles
 - Public transport may have been introduced (75A), but this is only a two hourly Preston to Fleetwood day service and has only been funded for 12 months. The 76 service which ran through Elswick and covered Blackpool and St Annes was withdrawn last year.

The Parish raised strong objection to the previous proposal, on the following grounds:

Size and Scale

There is a risk that if approved, a further application could be submitted to increase the numbers of housing on the same site. Due to its size and existing amenities, the Parish Council considers that this proposal is inappropriate development. Following a resolution at the Parish Council meeting held on the 24th November 2016, the Parish Council requests that if the Development Management Committee is minded to approve this amended outline proposal from 100 houses to 50 – that part of the scheme is designated as public open space.

Sustainable Development

Elswick scored low in sustainability assessments taken at the beginning of the Local Plan process. The Development Control Committee in March decided that Elswick should be defined in the emerging Local Plan as a Tier 2 Smaller Rural Settlement with an allocation of 50 houses.

Planning permission has already been granted for 18 houses and further small applications are awaiting approval which will account for half the number of houses allocated. Two other large applications are also awaiting determination, one for 50 and one for 36 houses. If these are also approved, the village could be faced with more than 3 times the number allocated in the emerging Local Plan - increasing the size of Elswick by 36%.

Elswick has no school, no health centre and one newsagents. Nearest health centre is 1.5 miles and supermarket 6 miles away. Similar distances must be travelled for shopping or recreational purposes. Very little employment opportunity. Since designation as a Tier 2 settlement, sustainability has further deteriorated with the loss of the bus service to Blackpool and the announcement that the largest employer in the village (Bonds) will close. The proposal will place additional burden on the local health service(s) which has a 3-4 week waiting list and no space to

expand. A senior partner at the Centre has confirmed the need for an additional GP but with no space to accommodate. 160 houses have been approved and applications for a further 330, it is essential therefore that a new Health Centre is built before any further housing applications are approved.

Whilst many people are attempting to find affordable housing, by moving into a rural location such as Elswick will result in higher transport costs resulting in a negative effect on any savings made on affordable house costs. For affordable housing to be sustainable it must be closer to employment and offer multiple transport options.

Fylde Borough Local Plan/ Emerging Local Plan

The site is allocated as open countryside and residential development is therefore contrary to Policy Sp2 and GD4, since it is not one of the five identified categories of acceptable development,

Undermining the Developing Neighbourhood Plan

Bringing about changes proposed in this scheme will undermine the spirit of Localism that governs the neighbourhood planning process introduced in the Localism Act 2011. If an application of this scale is approved by the Planning Authority, it runs the risk of causing considerable damage to the Neighbourhood Planning Process.

The overwhelming message from the questionnaire is that villagers wish to see the housing allocation in the emerging Local Plan distributed uniformly throughout around the village with several small developments rather than one or more large housing estates, enabling the village to grow whilst retaining its character.

Transport and Traffic

Concerns for impact of the development on the Thistleton junction with the A585. People describe crossing the A585 at the northerly Thistleton junction a 'nightmare' and turning left at the southerly junction 'highly dangerous'. Excessive waiting times at both junctions encourage frustrated drivers to take chances by pulling out in front of fast moving traffic. With poor and diminishing public transport services, cars are a necessity in Elswick and virtually all traffic movements involve accessing the A585.

The Parish Council understands that the Agency has imposed restrictions on Wyre Borough Councils development plans due to the over capacity on the road and considers that no further development should be approved in Elswick until the capacity of the road is resolved and improvements undertaken at the Thistleton junctions.

Site History

The proposed site has severe drainage problems spending most the year under water. Mill Lane also has severe flooding issues. Furthermore, there is a culvert from Mill Lane lying below Lodge Lane which creates flooding at the Elswick United Reformed Church. Any development which includes draining into the culvert will compound these flooding issues.

Summary

Elswick Parish Council strongly objects to this planning application by its size and scale and feels it is inappropriate for the location of the site and would therefore have a significant adverse impact on the character and appearance of the area. The Parish Council believes this proposal:

- *undermines the development of the Neighbourhood Plan*

- *places a further burden on existing stretched facilities*
- *fails to be of an appropriate scale for the village of Elswick*
- *does not meet standards for sustainable development*
- *will compound the traffic issues already experienced at the junctions of the A585*
- *planning for health care considerations have not been addressed causing extra demand pressures on the local health centre.*

The Parish Council therefore asks the Development Management Committee to reject this application outright.

Statutory Consultees and Observations of Other Interested Parties

Lancashire County Council - Highway Authority

No objection subject to condition requiring wheel wash facilities, access design to be agreed, design and implementation of off site highway works and construction management plan, and a £250k contribution toward bus service enhancement payable by S106.

When application 16/0180 was originally submitted the proposal was for 100 dwellings and subsequently reduced to 50 dwellings prior to determination. LCC did not oppose this proposal subject to a number of planning conditions and an s106. Since the time of application 16/0180 being considered by LCC additional development proposals have been submitted / determined such as application 16/0846 (Land north of High Gate and east of Copp Lane. LCC have considered the additional impact of these developments and have determined that there will not be any significant impact on highway safety or highway capacity on the local highway network. As such LCC's views on this proposal remain unchanged.

Travel Plan:

The submitted Travel Plan is only relevant to when the proposal was for 100 dwellings. LCC do not consider it essential that a Travel Plan be produced for a development of 50 dwellings at this location.

Access:

The access arrangement should be those that have previously agreed and shown on drawing 0826-F02 Rev C. The access works will need to be carried out under an s278 agreement.

Off Site Highway Improvements:

A number of off-site highway improvements were on the previous application (16/0180), these should be repeated here and include;

- a) Alterations to the Roseacre Road / Lodge Lane junction (as shown on drawing 0826-F02 Rev C)
- b) Footway improvements on Lodge Lane between the site access and Roseacre Road (details to be agreed)
- c) Upgrading of 2 No. existing bus stops to include raised boarding areas (details to be agreed).

Public Transport:

Recent cuts to the funding of subsidised bus services throughout Lancashire has led to the removal or reduction of public transport services.

Services 75A & 80 both operate on a two hour frequency through Elswick. The nearest sustainable towns to Elswick where a good range of services, amenities and employment opportunities exist are Kirkham and Poulton. Both Kirkham and Poulton are reachable by one or the other service giving a two hour frequency to either destination.

Both the 75A & 80 services are subsidised by LCC and future continuation of these services cannot be guaranteed. Previously £250K (spread over 5 years) was requested bus service provision and improvements in Elswick. This request is repeated.

Highways England

No objection, subject to condition for provision and implementation of a Travel Plan.

There are known issues with the Thistleton junction near to the application site, with congestion arising due to vehicles, particularly those turning right, finding it difficult to enter onto; or to cross over the A585(T) mainline at peak times. This also results in safety concerns as drivers seek to enter the A585(T) due to insufficient gaps in mainline traffic. An increased number of vehicles using this junction in the future would therefore be likely to exacerbate these issues.

Calculations presented in the Technical Note demonstrate that the development would generate between 15 and 16 trips that would use the Thistleton junction in the AM or PM peak hours. This equates to an additional vehicle every 3 to 4 minutes.

Accident analysis presented within the TN found that between from 2011 to October 2016 that 11 accidents have occurred at the junction, six accidents have occurred at the junction alone in 2016. 9 of the 11 accidents involved vehicles using the junction and making turning manoeuvres at the junction. 4 of the incidents during 2016 occurred outside of peak times. HE conclude that this is due to inadequate gap acceptance by drivers at the junction to enter onto the A585 mainline or cross it and this occurs throughout the daytime periods, which is a reflection of how heavy the A585 route flows can be throughout the day.

The submission refers to *forecast increases being minimal, 6 right-turners from Thistleton Road in Weekday AM peak and 9 right-turners from Mile Road in Weekday PM peak, equating to an additional right-turning vehicle every 10 and 15 minutes. Concluding that this will not result in any material changes to the operation or highway safety of the junction.* Notwithstanding, HE comment that however small these increases in traffic are, the risk of incidents happening at the junction will undoubtedly increase incrementally as development comes forward that is served by Thistleton junction in areas such as Elswick.

HE conclude A single development of 50 dwellings will possibly raise the risk only marginally. In this case, HE gives weight to the fact that this development of 50 dwellings is within the agreed housing allocation for Elswick within the Submission Version Fylde Local Plan. As a result, HE view is that they do not raise any objection to this application subject to a condition requiring a Travel Plan.

HE have raised concern that the incremental development coming forward in this area is cumulatively and significantly increasing the number of turning movements at the Thistleton junction, with a corresponding significant increase in risk to safety.

HE is of the view that, should this development be granted consent, further speculative development within Elswick would not be in accordance with the Fylde Local Plan, or the emerging Local Plan that is clearly cogent of the safety issues that affect Thistleton junction as described above. In view of the findings of this review, there is now a need for both applicants and the relevant Local Planning Authorities to seriously consider the need for a safety improvement scheme at Thistleton junction to accommodate further development.

In the absence of such an approach (and when viewed against the current situation of there not being an up to date Local Plan for Fylde), as the highway authority for the trunk road, we can only consider development on a case by case basis. We have no option other than to accept that, in isolation, each small development may not have a significant / severe impact. We would however urge Fylde Council to consider the cumulative and negative impact on safety of all of these new developments with a view to resisting further development until a coordinated approach to infrastructure mitigation can be achieved.

In light of the Copp Lane approval (16/0846), Highways England have provided the following comments:

Our existing responses set out the relevant points that we draw Fylde Council's attention to in determining these applications.

United Utilities

No objection to the proposal, subject to condition requiring drainage for the development to accord with the principles set out in the submitted Flood Risk Assessment, with no surface water drainage to the public sewer, unless otherwise agreed in writing by the Planning Authority.

A condition is also requested relating to management and maintenance of the any sustainable drainage system on the site.

Natural England

Based on the information provided, Natural England advises that the proposal is unlikely to affect any statutorily protected sites or landscapes.

NE have not assessed this application and associated documents for impacts on protected species.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

Greater Manchester Ecology Unit

Summary

Ecological issues on this site were resolved to the satisfaction of the GMEU as part of the previous application 16/0180 and recommendations made with regards to informatives and conditions. The new application is based on the same layout and ecological

information and the ecological data is still under two years old. Previous recommendations therefore largely apply.

Great Crested Newts

Whilst the pond within the development site has a historic record of a great crested newt (GCN) over 20 years old, the ecological consultants found no evidence of GCN being present in this pond or other ponds within 250m of the development. As a number of the more distant ponds were not however accessed it was agreed that a reasonable avoidance method statement was required via condition. Our previous recommendation of the 28 April 2016 still largely applies. The survey data is now however nearly two years. I recommend a condition along the following lines be applied to any permission.

Prior to any earthworks a reasonable avoidance method statement for amphibians shall be provided to and agreed in writing to the LPA. If the development hereby approved does not commence before 1 April 2018, the ponds will be reassessed great crested newt breeding potential and the finding supplied to and agreed in writing by the LPA and an informative also applied

Whilst there is only a low risk of great crested newts being present, the applicant is reminded that under the Habitat Regulation it is an offence to disturb, harm or kill great crested newts. If a great crested newt is found during the development all work should cease immediately and a suitably licensed amphibian ecologist employed to assess how best to safeguard the newt(s). Natural England should also be informed.

Bats

Trees were assessed for their bat roosting potential and bat activity surveys carried out. A number of trees were regarded as high risk for bat roosts and information previously requested regarding whether these trees were to be retained. Whilst I note that both the D & A statement and indicative masterplan have as objective the retention of the majority of the boundary trees, I can find no evidence that there was ever a response to my request for confirmation that trees with high roost potential are to be retained (apologies if this information was supplied) and whilst it is clear that most of the high risk trees are avoidable, T1 & T2 in particular could be lost. Prior to determination please request further information on whether any high (or moderate) risk trees are to be lost.

As this is outline however I accept that such information may not be known. If this is the case I would recommend conditioning retention of all moderate and high risk trees unless otherwise agreed in writing by the LPA

Bat activity surveys were also carried out. These demonstrated no significant impacts on foraging and commuting activity. I therefore still recommend a condition along the following lines is applied to any permission.

The development shall be carried out in accordance with the details contained in the Bat Activity Appendix 2016, TEP Ref 5194.005 Section 4.0 as already submitted with the planning application and agreed in principle with the LPA prior to determination.

Other Protected Species

The site was assessed as low risk for all other likely protected species. I accept these findings no further measures required.

Nesting Birds

Some impacts on boundary hedges are likely to occur in order to create access to the site, potential bird nesting habitat. The field also could provide nesting habitat for ground nesting birds such as lapwing and skylark. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. Please apply the following condition to any permission.

No works to trees or shrubs or site clearance shall occur between the 1 March and 31 August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to clearance and written confirmation provided that no active bird nests are present which has been agreed in writing by the LPA.

Ecological Impact of the Development (excluding bats and gcn)

The site will result in the loss of a significant area of semi-improved grassland a low value ecological feature. The majority of the high value habitats: the pond, hedgerows and mature trees are to be retained. The NPPF states that the planning system should contribute to and enhance the natural environment through a range of actions. Adequate land is being retained to enable mitigation to occur, as long as adequately enhanced. I am therefore happy that mitigation for the loss of semi-improved grassland, short sections of hedgerow, potentially trees and associated bird nesting habitat can be provided on site and conditioned along the following lines.

An ecological management plan shall be submitted to and approved in writing by the LPA, prior to commencement of development. The content of the plan should include:

- mitigation for loss of semi-improved grassland;
- mitigation for Loss of trees and hedgerows and associated loss of bird nesting habitat;
- enhancement of the retained hedgerows;
- protection and buffering habitat for the pond;
- a five year implementation and management plan

The approved plan will be implemented in accordance with the approved details.

LCC Contributions

Taking into account all relevant secondary schools (Kirkham Carr Hill, Hodgson Academy and Baines School) and committed development, a shortfall of 134 secondary school places has been confirmed. The pupil yield from the development is equivalent of 8 secondary places. On this basis, given the shortfall of secondary school places LCC will be seeking a contribution for 8 secondary school places at the closest secondary school of Hodgson where there is also a deficiency of places.

The contribution equates to £24,423.27 x 8 places = £171,386.16

The named infrastructure project is Baines School Poulton-le-Fylde.

LCC will not be seeking a contribution for primary school places since there is sufficient capacity within existing schools to cater for the demand created.

Regeneration Team (Trees)

No comments have been received to this current application, however the following comments were provided to the previous application 16/0180:

“The illustrative masterplan indicates existing trees to the site boundaries for retention and the contents of the tree survey suggest this is feasible. Having looked at all trees from within the site yesterday I’m left in an unusual position because I feel that the tree survey rates them, in the main, as better trees than they are.

Site photographs accompanying the survey show that it was done in the early Summer and I feel that seen in full leaf these trees do possess high levels of beauty and amenity, but focused inspection during Winter reveals a different picture.

Several of the visually dominant ash trees to the northern boundary are declining and not suitable for the long-term. It’s therefore best to regard the site as substantially unscreened on this boundary.

Trees to the south on Mill Lane are mostly self-sown sycamores and many have been damaged, presumably by managing the drainage ditch. They’ve all grown in competition with one another and have that leggy, attenuated form as a consequence. Ivy has added to their suppression. They work as a collective, scoring low as individuals. Some would be lost to the proposed access but I see no strong defence for them on amenity grounds at any rate it’s difficult to see these trees as ideal long-term screening for the site. Among these trees is a veteran ash tree (T38 in the survey): it’s the best tree on this boundary and is a landmark specimen, but it has signs of internal decay such as nesting holes in primary branches that indicate the wood is not as it should be. Since these overhang the lane, which would post-development become a busy thoroughfare, I feel it probably isn’t realistic to suggest the tree will be a long-term feature of the site.

Of those few trees internal to the field, only T2, a mature sycamore on a boundary with a private property, has wider amenity value. One other boundary tree has been rated as a ‘B’ in the survey but it’s lost one of its two primary stems and is in effect only a part of a previously twin-stemmed sycamore.

The overall picture then is one of trees that have amenity but which would not be suitable for retention within a development.

Drainage infrastructure is also bound to impact trees and tree roots since it must be routed through the site to the existing mains, and the pond appears to have formed a natural “sluice” where it runs overland to Bonds Lane. This would have to be culverted to a drain, or otherwise remedied, and I imagine difficulties there viz-a-viz construction, pipework and tree retentions.

The proposal to culvert the existing ditch on Mill lane will also cost trees, but these are low-value and are growing so tightly to property boundaries that they're not ideal for retention, and again, many are already damaged at their stems.

In all, this seems to turn on appropriate landscaping rather than integrating existing trees into a large development. What seems clear is that the current screen of trees can't be relied upon to remain for an indefinite period. If the Council were minded to consent to this proposal, I feel it should include the provision for a substantial buffer plantation around the site so that successor trees are growing in readiness for when the existing ones have to be removed."

Environmental Protection (Pollution)

No objections subject to conditions relating to hours of construction restrictions and land contamination survey/ remediation being secured by condition.

National Air Traffic Services

The proposed development has been examined from a technical safeguarding perspective and does not conflict with our safeguarding criteria. Accordingly, NATS (en route) has no safeguarding objection to the proposal.

Strategic Housing

No comments have been received to this current application, however the following comments were provided to the previous application 16/0180:

No objection to the proposal, subject to the provision of 30% affordable housing within the development. Concerns raised to whether apartments could be let in this location.

Electricity North West

The development is shown to be adjacent to or affect Electricity North West operational land or electricity distribution assets. Where the development is adjacent to operational land the applicant must ensure that the development does not encroach over either the land or any ancillary rights of access or cable easements. If planning permission is granted the applicant should verify such details by contacting Electricity North West, Estates and Wayleaves, Frederick Road, Salford, Manchester M6 6QH.

The applicant should be advised that great care should be taken at all times to protect both the electrical apparatus and any personnel working in its vicinity.

If there is a requirement to divert the apparatus because of the proposed works, the cost of such a diversion would usually be borne by the applicant.

Lancashire County Archaeology Service

No comments have been received to this current application, however the following comments were provided to the previous application 16/0180:

No objection to the proposal, it is not considered that any formal archaeological investigation is justified.

The site appears to lie to the east of the medieval settlement of Elswick and aerial photography suggests that the plot has been ploughed or drained heavily in the early to

mid-20th century and that it was originally more than one field. It also contains a large pond, which probably originated as a marl pit in the 18th or early 19th century. The Historic Environment Record does not list any sites within or immediately adjacent to the proposed development site, beyond the site of Elswick Windmill, which is shown on William Yates' map of 1786 but not on Greenwood's 1812 map or the first edition OS 1:10,560 sheet. The mill, which probably gave its name to Mill Lane, seems to have been located to the east of the development site, perhaps in the vicinity of Mill House Farm.

Wyre Borough Council

No comments received.

Environment Agency

No comment to make – no need for consultation.

Lancashire CC Flood Risk Management Team

No objection to the proposal, subject to conditions requiring surface water drainage scheme as part of any subsequent reserved matters application, construction of pond/detention basin prior to construction and management/ maintenance of sustainable drainage systems on the site.

The Flood Authority are aware of localised flooding at this location and expect to see the drainage scheme to take account of existing surface water issues so surface water flooding from the development would not exacerbate the existing situation and if possible betterment could be achieved.

Lancashire Constabulary

No objections raised, but do comment that the number of recorded crimes is low though there has been a number of burglaries and criminal damage offences. Recommendations are made to reduce crime risk where possible within the design and the development should be built to Secure by Design standards, including physical security, natural surveillance, car parking, rear gardens and site security during the construction phase.

Neighbour Observations

Neighbours notified: 30 March 2017

Site Notice Date: 5th April 2017

Press Notice Date: 06 April 2017

Number of Responses 54

Summary of Comments:

- An identical application was rejected by the Planning Committee in February and nothing has changed.
- Need for the development.
- Contrary to the NPPF and represents a huge intrusion into open countryside.
- Urbanise and destroy the character of the Village with no mitigating benefit.
- Other more appropriate sites that are available and have been submitted as part of the call for 'Non Strategic Development Sites'.
- Contrary to Elswick classification as a Tier 2 Smaller Rural Settlement which allocates 50 dwellings in the new local plan, and almost half of this allocation has been built already.
- Cumulatively with development already approved, 50 houses will exceed the Village allocation by 52%.

- Resubmission is premature to the Inspectors ruling on the emerging local plan. The previously refused application has been appealed and it is likely that this appeal will be considered against the newly adopted local plan.
- Despite being disputed by the applicant at the Local Plan Examination, the Council has a 5.58 Year Housing Supply and should be used by the Planning Committee to determine planning applications.
- Negate work on the Parish Plan which favours several small developments, scattered uniformly throughout the Village. The Neighbourhood Planning Team have spoken to land owners and do not anticipate problems in meeting the land requirements and allocation of sufficient land to meet remaining housing numbers.
- Lack of local services and amenities in Elswick – no post office, school or health centre.
- Lack of health services. The nearest health centre at Gt Eccleston Health is at capacity with waiting times of up to 4 weeks to see a Doctor or Nurse and there is no capacity for expansion.
- Lack of employment opportunities.
- Lack of local school and added pressure to existing schools, the nearest Primary School being in Gt Eccleston (at capacity) and Secondary School at Carr Hill, Kirkham.
- Deterioration of sustainability due to closure of Bonds, cessation of bus service, closure of the nursery.
- Validity of the Transport Assessment and Travel Plan.
- Highway safety. Speeding occurs on Lodge Lane with various accidents being reported. Poor access to Lodge Lane from Mill Lane and capacity to deal with traffic generated by the proposal (50 houses equates to 90 extra cars and an extra 300+ traffic movements each day).
- Exacerbation of existing congestion and highway safety problems at the Thistleton junction of the A585. Highways Agency are particularly concerned and would have objected but for the fact that the threshold of 50 dwellings is normally a level where they try not to get involved.
- Congestion on the roads from this and other residential development recently approved in Elswick.
- Highway safety during 4 year construction period.
- Entrapment of vehicles used by existing residents during the construction period.
- Damage to existing roads from increased car usage and associated costs.
- Limited Bus Service – hourly bus service, with no service after 19:00 and on Sundays. The 76 bus service has been discontinued and the existing infrequent service is only contracted for 12 months.
- Possible closure of Mill Lane during construction of the site access and impact this will have for existing residents/ businesses which use this access road.
- Unwillingness of the applicant to provide affordable housing within the scheme.
- Validity of the Flood Risk Assessment
- Exacerbate existing drainage and surface water problems. Photos illustrating flood problems at the junction of Mill Lane/ Lodge Lane, water logged ground conditions on the site, including over topping of the pond have been received.
- Ecology – use of the field and pond by wildlife such as ducks and swans, as a breeding ground for frogs and newts, trees and hedgerows are prime nesting sites and refuge for bats and woodpeckers.
- Lack of available countryside for the emergency landing of hot air balloons.
- Damage the local housing market.
- Upgrade of electricity and substation will be required.
- Loss of agricultural land.

Relevant Planning Policy

Fylde Borough Local Plan:

SP02	Development in countryside areas
HL02	Development control criteria for new housing proposals
HL06	Design of residential estates
TR01	Improving pedestrian facilities
TR05	Public transport provision for large developments
TREC17	Public Open Space within New Housing Developments
EP10	Protection of important landscape and habitat features
EP11	Building design & landscape character
EP12	Conservation trees & woodland
EP14	Landscaping of new developments
EP18	Natural features
EP21	Archaeology
EP19	Protected species
EP22	Protection of agricultural land
EP30	Development within floodplains

Fylde Local Plan to 2032:

NP1	Presumption in favour of Sustainable Development
S1	Proposed Settlement Hierarchy
DLF1	Development Locations for Fylde
SL5	Development Sites outside Strategic Locations for Devt
GD1	Settlement Boundaries
GD4	Development in the Countryside
GD7	Achieving Good Design in Development
H1	Housing Delivery and the Allocation of Housing Land
H2	Density and Mix of New Residential Development
H4	Affordable Housing
INF1	Service Accessibility and Infrastructure
INF2	Developer Contributions
T4	Enhancing Sustainable Transport Choice
T5	Parking Standards
CL1	Flood Alleviation, Water Quality and Water Efficiency
CL2	Surface Water Run-Off and Sustainable Drainage
ENV1	Landscape
ENV2	Biodiversity
ENV4	Provision of New Open Space
ENV5	Historic Environment

Other Relevant Policy:

NPPF:	National Planning Policy Framework
NPPG:	National Planning Practice Guidance

Site Constraints

Within countryside area

Environmental Impact Assessment

The Planning Authority has issued a Screening Opinion which determined that residential development of the application site of up to 120 dwellings did not constitute EIA development for

the purposes of the definition contained within the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

Comment and Analysis

The main issues pertinent in the assessment of this proposal are:

- Principle of development.
- Relationship with Surrounding Development.
- Highways.
- Flood risk and drainage.
- Ecology.
- Trees.
- Heritage.

Principle of Development

Policy Context and Site Allocation

Paragraph 38 (6) of the Planning and Compulsory Purchase Act 2004 indicates that development proposals should be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF advocates a presumption in favour of sustainable development. In terms of decision taking, this means approving development proposals that accord with the development plan without delay. Where the development plan is absent, silent or relevant policies are out-of-date, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in Framework. It advises that decision takers at every level should seek to approve applications for sustainable development where possible.

The site is located within the Countryside Area as defined on the Proposals Map of the FBLP and SV. Policies SP2 and GD4 are of relevance and seek to safeguard the natural quality of the countryside area by supporting development related to agriculture, horticulture, forestry or other uses appropriate to a rural area only. The development proposed cannot be categorised as such and is therefore contrary to Policies SP2 and GD4.

Notwithstanding this, assessment against the NPPF and other material considerations must be made to determine whether there is sufficient justification to outweigh this position.

Housing Need

The NPPF emphasises the importance of housing delivery and requires a five year supply for market and affordable housing to be maintained by Local Planning Authorities. Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development and that relevant policies for the supply of housing are not considered up to date if a 5 year supply of deliverable sites cannot be demonstrated.

The most recent adopted 5 Year Housing Supply figure was a 4.8 year supply as of 31st March 2016. The Planning Authority is currently undertaking the public examination of the new Local Plan, and has been required to update the five year housing land supply position as part of the evidence base taking account of representations made to the examination regarding likely delivery rates. This revised approach indicates that the Council is able to demonstrate a 5.1 year supply. Members should note that this revised figure will be the subject of further public consultation during the summer and is yet to be tested by the Examination, including the annual housing requirement of 415 dwellings and the deliverability of certain sites. However, at this time, the Council's position is that it is able to demonstrate a 5 year housing supply.

Policy DLF1 of the SV sets out a targeted strategy for new residential development within Fylde, identifying Elswick as a Tier 2: Smaller Rural Settlement location capable of accommodating 50 homes over the plan period. To date 46 dwellings have been granted consent over the plan period, Copp Lane (24 units), Bonds Ice Cream (8 units), Elswick Trading Park (9 units) and Chapel Farm (5 units). The addition of this current proposal would therefore exceed the 50 unit provision within Policy SL5 by 46 units.

Representation has been received to Policies DLF1 and SL5 with specific regard to Elswick and its classification as a Tier 2 Smaller Rural Settlement. Discussion at the Examination focussed on the sustainability of Elswick to demonstrate its Tier 2 status, as well as an upgrade of the Village to a Tier 1 settlement capable of accommodating 150 new homes over the plan period. Whilst the SV is a material consideration, the Inspector is yet to publish her findings of the Examination. Since the SV has unresolved objections with specific reference to housing provision in Elswick, relevant policies can only have limited weight in the decision making process. Notwithstanding this, the Council's housing supply statement includes an allowance for dwellings coming forward during the next 5 year period at Elswick in line with the SV. It should also be noted that the Inspector has been very clear that, in order to comply with national policy as set out in the Framework, the figure of 50 dwellings set out for Elswick must not be regarded as a 'cap' on development.

The Council approved an application made by Elswick Parish Council to designate an 'Elswick Parish Neighbourhood Area' on 1 August 2016. This will allow the Parish to formulate policies within a Neighbourhood Plan including location housing which, if adopted, will become material in the determination of planning applications within the approved Area. Since the Neighbourhood Plan for Elswick is only an emerging document, no weight can be attached to it in the determination of this current application. As the Council cannot defer the determination of planning applications pending the adoption of a neighbourhood plan, the lack of allocated sites within a development plan cannot be a reason to refuse planning permission.

Does the proposal deliver sustainable development?

The National Planning Policy Framework requires developments to be sustainable. There are many aspects to be considered in that assessment, with the key issues for a residential scheme in this location being availability and accessibility of services, scale of development and visual impact.

Accessibility and Availability of Services

Objectors have suggested that there is a lack of services which are capable of supporting a development of the size proposed. It should be noted that Elswick Parish Council have raised concern to the sustainability of the development, based on the settlement scoring low in the sustainability assessments used to inform the emerging Local Plan. This is based upon a lack of health centre, education facilities, post office, supermarket and further eroded by reduced employment opportunities from loss of Bonds Ice Cream and reduced bus services.

Elswick is an identified settlement within Policy SP1(4) of the FBLP. Elswick is also defined as a Tier 2 settlement in the SV. This is an acknowledgement that Elswick is capable of accommodating sustainable growth, albeit that it may have a dependency on other settlements for some services.

The application site is located to the east of the village on the edge of the settlement boundary of Elswick. Elswick has a number of local services within its envelope, including two public houses, Bonds café, Church, Village Hall/ Community Centre, equipped play area, tennis courts, bowling green and post box. Great Eccleston Copp C of E Primary School is located within walking distance to the north on Copp Lane, the closest secondary school being Carr Hill in Kirkham. It is noted that

there are few employment opportunities in Elswick, indeed the manufacturing element of Bonds Ice Cream has recently closed, and that residents rely on connections to other villages for some services including Post Office and health care.

According to the Lancashire County Council web site, there are bus stops within the Village in proximity of the application site providing services 75A (Fleetwood to Preston every 2 hours) and 80 (Preston to Myerscough every 2 hours). A third service, 78, has been withdrawn by the provider this year.

Concern has been raised by residents with regards to existing pressures on the health centre in Gt Eccleston with waiting times of up to 4 weeks, and, education facilities, lack of employment opportunity and reduced bus service affecting the sites sustainability. It is acknowledged that these matters do affect the sustainability of Elswick, however it is considered that such matters alone are not sufficient to refuse the development on sustainability grounds. LCC Education comment that there is sufficient capacity at Gt Eccleston and Copp Lane Primary Schools to accommodate the development and that of other committed development within the locality. The development will generate a need for 8 additional secondary school places and there is a reported shortfall of provision requiring a financial contribution of £171,386.16 in mitigation, to be used at Hodgson Academy.

As identified in paragraphs 34 and 38 of the NPPF, it is inevitable that sites within the countryside will not benefit from the same accessibility to services as those within the urban area. It does not, however, follow that all development within the rural area is always unsustainable and, as acknowledged at paragraph 55 of the NPPF, the introduction of housing in rural areas is capable of enhancing the vitality of rural communities by supporting local shops and services. Indeed, the test in paragraph 55 of the NPPF is to avoid new isolated homes in the countryside.

The proposed development, by virtue of its location on the edge of the settlement, would be well connected to existing facilities and would not be isolated from them in comparison to existing dwellings within the village envelope. Moreover, the addition of up to 50 dwellings would help sustain and could act as a catalyst for the development of local facilities and services. The site is accessible by 2 bus services, providing sustainable connectivity to larger settlements. Gt Eccleston Copp C of E Primary School is within walking distance and Gt Eccleston Primary school is further afield, both have capacity to accommodate the development, and, there are other facilities including shop, primary school and health care opportunities at Gt Eccleston Village, as well other settlements accessible via the bus services offered. On this basis, the site is considered to be in a sustainable location, would not result in the introduction of isolated homes in the countryside and will enhance or maintain the vitality of the rural area (paragraph 55). Therefore whilst the application would be contrary to Policy SP2 of the FBLP in this instance there is greater weight to be given to the NPPF due to the sites sustainable location, housing objectives and presumption in favour of sustainable development.

Scale of Development

The scale of development proposed is intrinsic to the scheme design, the NPPF states that design is a key aspect of sustainable development and that permission should be refused for development of poor design. Policy HL2 of FBLP supports residential development subject to a number of set criteria, with reference to scale of development this criteria includes development to be in-keeping with the character of the locality and a density of between 30-50 units per hectare. Elswick Parish Council comment the proposal will increase the size of Elswick by 36% when added to approved developments and current housing applications. Residents have raised concern to the scale of development and how this would alter the village character.

The indicative layout provides for a density of 11 dwellings per hectare (DPH), based on a site area of 4.7 hectares referred to in the submitted application form. This DPH figure is low in comparison to policy requirements, though it is recognised that a significant amount of open space is provided indicatively within the scheme. Furthermore, density requirements of Policy HL2 are not representative of a village setting or location of the development within countryside, being akin to a higher density urban area. The application site represents a transition between the village boundary and countryside beyond and on this basis a lower density scheme providing a sense of openness is more appropriate and could be supported.

The nature of the outline application has not provided detailed layout or elevation drawings of dwellings proposed. The submission refers to development over 2-2.5 storeys, which would be in-keeping with the predominant 2 storey character of the locality and wider village envelope. It is recommended that appropriate conditions to restrict the size of dwellings are attached to any subsequent approval notice

There are approximately 463 dwellings in the village of Elswick. The proposal would result in an 11% increase in the village size, and 21% when combined with other committed development (Copp Lane (24 units), Bonds Ice Cream (8), Elswick Trading Park (9) and Chapel Farm (5)). It is not considered that this proposal would be an unacceptable scale of growth to the settlement and that there are sufficient services within the settlement to meet the needs of existing and prospective occupants. These figures provide a quantitative context and there is no set percentage restricting the degree to which an existing settlement can expand. The consideration is whether any impacts arising as a result of the development's size, scale and relationship to the settlement would give rise to significant and demonstrable harm which would outweigh the benefits that it would otherwise deliver. The development's impact on the character and appearance of the area in visual and landscape terms are considered to be of importance in this regard.

Visual and Landscape Impact

Policy HL2 supports new residential development which is compatible with adjacent land uses and would be in-keeping with the character of the locality. Policy EP10 indicates that the distinct character and important habitats of Fylde will be protected. The policy identifies that particular priority will be given to the protection of important landscape and habitat features, including broadleaved woodland, scrub meadows, hedgerows, wetlands, ponds and watercourses. Policy EP11 states that new development in rural areas should be sited so that it is in keeping with landscape character, development should be of a high standard of design and matters of scale, features and building materials should reflect the local vernacular style. Policy EP12 states that trees and hedgerows which make a significant contribution to townscape or landscape character, quality and visual amenity will be protected. Policy EP14 requires new housing developments to make suitable provision for landscape planting. This reflects guidance contained within the SV and NPPF.

The applicant has submitted a Landscape and Visual Appraisal of the development which concludes that there will be a moderate effect on the local landscape during the initial construction phase, which will reduce to slight-moderate following establishment of landscaping. The application site lies between 2 Lanes which contains the effect on the wider character area, being assessed to have a low change which corresponds to a slight moderate effect on wider landscape character. A high visual change is reported for housing adjacent to the application site and a low change to public footpaths once landscaping is established.

The applicant has submitted Arboricultural Impact Assessment (AIA) which includes a survey of trees within and overhanging the site in respect of their condition, retention category and root protection

area. The assessment concludes that a few trees must be removed to facilitate the proposed access, however it would be possible to develop the site whilst retaining all or majority of higher value trees and that majority of existing hedgerow could also be retained. The existing pond is also retained within the indicative layout. Accordingly, the most valuable landscape features on the site would be retained. Conditions are suggested requiring the implementation of tree protection measures and the submission of a landscape strategy which provides for the retention of these features.

The site is situated on the eastern edge of the settlement boundary of Elswick and forms part of an area of open countryside which extends to the north and east of the village. The sites eastern and southern boundary abuts the built up area of the village adjacent to dwellings on Lodge Lane, Linden Fold and Ash Close. Existing dwellings have either a side on or rear facing aspect to the countryside with rear gardens and associated boundary treatment adjoining countryside. A mix of trees and hedgerow form a natural boundary to other elevations of the site. The site is not considered to be in a particularly prominent location, with only glimpsed views through open fields, trees and individual housing being afforded when entering the village by road on Lodge Lane; as demonstrated in the Landscape and Visual Impact Assessment. There is a Bridleway located approximately 160m to the east though affords limited views of the application site being hampered by landscaping, housing and farm buildings. There are of course more prominent views of the site when seen at close quarters from adjacent housing, Bonds Lane and Mill Lane, these roads however are not heavily trafficked.

The Illustrative Framework Plan splits the application site in two, with housing to the village side of a deep landscape buffer which incorporates the retained pond. This is considered to be a natural expansion of Elswick which relates well to the defined Village boundary designated in the adopted FBLP. The proposal provides opportunity for an outward facing development, with significant landscaping buffer and retained natural features that will act as a soft barrier to assimilate the proposal into the countryside setting, enhancing the appearance of the village edge. Such features are intrinsic to the proposal making a successful transition between urban and rural, forming appropriate mitigation against the countryside encroachment.

It must be accepted that the proposal will result in the urbanisation of a countryside location with resultant harm to landscape character. Notwithstanding, this is the case for the majority of sites in the Countryside Area and it follows that site-specific considerations will be important in determining the degree of harm arising. The development would diminish openness and would interrupt existing external views of the site where available, though the site is not considered to be in a prominent location. Any harm would be minimised by virtue of the development's relationship with existing buildings on the edge of the settlement, retention of existing features and provision of new landscaping within the proposal. It is not considered that the limited visual harm to landscape character would be sufficient to outweigh the benefits of the scheme to a degree which would warrant refusal of the application. Moreover, substantial mitigation would be introduced in order to ensure that any adverse impact in this regard is minimised.

It is important that the parameters of the Illustrative Framework Plan are provided within any subsequent reserved matters planning application, this can be controlled by condition.

Loss of agricultural land

Paragraph 112 of the NPPF stipulates that Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. 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. In addition, Policy EP22 states that development will not be permitted which would involve the permanent loss of the

best and most versatile agricultural land (grades 1, 2 and 3a) where it could reasonably take place on previously developed sites, on land within the boundaries of existing developed areas or on poorer quality agricultural land. Policy EP22 identifies that there is no Grade 1 agricultural land within the borough, with Grades 2 and 3a considered the best and most versatile.

The Agricultural Land Classification Map is based on the Ministry of Agriculture, Fisheries and Food Soil Survey of England and Wales 1969 which is intended for strategic purposes. The map indicates the site to be Grade 2, though is only accurate to about 80ha. The application is supported by an Agricultural Land Classification (ALC) assessment which concludes that land quality on the whole site is limited by soil wetness and topsoil texture, mainly to subgrade 3b (75%), with a smaller area of subgrade 3a (25%). Development of majority of the site therefore accords with NPPF and FBLP policy for use of poorer quality land in preference to that of a higher quality. With regards to the 3a classification on site, the loss of the Borough's best and most versatile agricultural land for residential development has been allowed at a number of recent appeals and should not be seen as an overriding factor in the planning balance. Use of the 3a portion of the site is further constrained by its small size relative to the application site and detachment from other higher grades of land by field boundaries, roads and housing.

Given the above, it is not considered that the development would result in a significant loss of the Borough's best and most versatile agricultural land.

Principle of Development – Conclusion.

The site lies within the Countryside Area and outside the settlement boundary of Elswick as identified on the FBLP and SV Proposals Maps. The proposed residential development does not fall within any of the categories of appropriate development outlined in FBLP policy SP2 and SV Policy GD4 and is therefore in conflict with this policy.

The most recent adopted 5 Year Housing Supply figure was a 4.8 year supply as of 31st March 2016. The Planning Authority is currently undertaking the public examination of the new Local Plan, and has been required to update the five year housing land supply position as part of the evidence base. This revised approach indicates that the Council is able to demonstrate a 5.1 year supply though Members should note that this figure is subject to further public consultation during the summer and is yet to be tested by the Examination.

The proposal would add to the number of dwellings with planning permission in Elswick, increasing numbers to 96 and exceeding the 50 unit threshold advocated for Elswick within the SV. Discussion at the Examination focussed on the sustainability of Elswick to demonstrate its Tier 2 status, as well as an upgrade of the Village to a Tier 1 settlement capable of accommodating 150 new homes over the plan period. Whilst the SV is a material consideration, the Inspector is yet to publish her findings of the Examination. Since the SV has unresolved objections with specific reference to housing provision in Elswick, relevant policies can only have moderate weight in the decision making process. Notwithstanding this, the Council's housing supply statement includes an allowance for dwellings coming forward during the next 5 year period at Elswick in line with the SV. It should also be noted that the Inspector has been very clear that, in order to comply with national policy as set out in the Framework, the figure of 50 dwellings set out for Elswick must not be regarded as a 'cap' on development.

The application site is considered to be in a sustainable location and would not result in the introduction of isolated homes in the countryside. The scale of development is considered appropriate and would not unacceptably undermine the character of Elswick. The development represents a rounding off of the defined Village Boundary in this locality, a deep landscaping buffer

to open countryside and outward facing development will provide a transitional buffer between urban and rural and act to enhance the village setting. The site is not considered to be in a highly prominent location, retention of natural features and strengthening of landscaping to the site boundaries would ensure that any harm to landscape character and visual amenity is minimised.

As has been demonstrated through numerous appeals, the principle of housing development cannot be resisted in the Countryside Area providing that it is sustainable in all other respects and that no other demonstrable harm would arise as a result. Whilst the development would result in encroachment into the open countryside, it would make a valuable contribution to the delivery of housing in the Borough. Additional benefits occur in this case as the development would deliver up to 30% affordable housing on the site and contributions to bus service enhancement. It is also considered that sustainable housing development should be supported in order to maintain a 5 year supply, irrespective of location, as failure to do so would increase risk of the Council not being able to demonstrate a 5 year supply in the future.

On balance, it is considered that the benefits arising as a result of the development would outweigh the limited harm which has been identified in visual and landscape terms and that the principle of development is acceptable, having particular regard to the requirements of the Development Plan and NPPF.

Relationship with Surrounding Development:

Policy HL2 of the FBLP and GD7 of the SV support new residential development that would have no adverse effect on the amenity and privacy of neighbouring properties. This amenity impact includes privacy, dominance, loss of light, over shadowing or disturbance resultant from the development itself on neighbours, or during the construction period. The SPD provides additional guidance with particular reference to separation distances between dwellings to ensure the amenity of residents is safeguarded.

The Illustrative Framework Plan sites development pockets adjacent to the eastern boundary of Elswick and there are a number of dwellings adjacent which could be affected by the proposals. Indeed concerns have been raised with particular reference to noise and vibration disturbance during the construction period.

The planning application is made in outline form with detailed siting of dwellings being reserved for subsequent application, the relationship between dwellings proposed and neighbours cannot therefore be assessed at this time. Notwithstanding this, Policy HL2 and GD7 are clear in that amenity of existing residents must be safeguarded and it is expected that any subsequent reserved matters application is compliant with these Policies.

The proposal will intensify use of the site and increase the number of vehicles on access roads, including Lodge Lane and Mill Lane. The level of vehicle activity associated with the development is not considered to have a significant noise impact on adjacent residents and is therefore unlikely to cause an unacceptable disturbance. It is inevitable that there will be some disruption for residents during the construction period. This disruption however is temporary, for duration of the build and is therefore acceptable. Conditions can be imposed to reduce this disruption for neighbours and construction hour's restriction, wheel wash facility and dust controls are recommended.

Highways:

Paragraph 32 of the NPPF states that decision makers should take account of whether safe and suitable access to the site can be achieved for all people, and, improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Policy HL2 supports new residential development provided satisfactory access and parking arrangements are provided, and do not adversely affect the safe and efficient operation of the highway network, either individually or cumulatively with other permitted developments. Policy TR1 also encourages the improvement of facilities for pedestrians to encourage walking as an alternative means of travel. Policy GD7 and T5 of the SV reiterate the above highway policy position.

Objection has been raised by Elswick Parish Council and local residents in relation to highway safety implications resultant from additional vehicle movements on the surrounding road network, this includes exacerbation of existing problems at the Thistleton junction with the A585.

The submission indicates that the sole vehicular access to the development will be via a new access road to the north of Mill Lane. This arrangement will result in a change of priority with vehicles using the access road having priority over those vehicles using the existing Mill Lane carriageway. The junction of Mill Lane/ Lodge Lane will be adapted to improve visibility and will entail a slight narrowing of the Mill Lane/ Lodge Lane junction to provide a junction build out. The existing footpath network will be continued from Lodge Lane into the application site and pedestrian linkage to Bonds Lane is also provided.

The applicant has submitted a Transport Assessment (TA) which relates to the original application for 100 units. In addition, a Technical Note (TN) has been provided to support the revised proposal of 50 dwellings.

The TA confirms that Traffic Surveys were undertaken at Am and PM peak times at 4 junctions which included two on Lodge Lane and two on the A585. It is reported that the development is forecast to generate a 2 way total of approximately 59 trips in the AM peak and 67 trips in the PM peak hours being spread on to the network. In summary the TA concludes that the development proposals would have a minimal impact on the local highway network, acknowledging that the site access junction off Mill Lane is designed to accord with highway safety design standards and will have sufficient capacity to accommodate additional traffic. Furthermore, the TA also considers that the junction of Mill Lane/ Lodge Lane and that of Lodge Lane/ Roseacre Road/ Ash Road are forecast to operate within capacity, and the proposal would have a minimal impact on the operation of the A585 Fleetwood Road/ B5269 Thistleton Road junction. The TA also considers the site to be highly accessible with linkages to the existing footpath network, close proximity to cycle routes and Bus Stops promoting alternative transport modes.

The TN provides additional information relating to the Thistleton junction of the A585. Traffic generated by the approved development of 90 dwellings at Copp Lane, Great Eccleston is referred to in the TN. It is expected that the development is forecast to generate a two way total of approximately 29 trips in the Am peak hour and 33 trips in the PM peak hour, resulting in approximately 16 two way trips during weekday peak times at the Thistleton junction, equivalent to an additional vehicle every 3 to 4 minutes. The junction has been forecast to operate within its theoretical capacity and in excess of its theoretical capacity by 2021. The development itself will result in minimal increase and on this basis the TN concludes that the proposed development will have minimal impact on the operation of the junction. The TN reports 10 accidents at the Thistleton junction between September 2011 and May 2016, 3 of which were classified as serious injury and the remaining 7 of slight injury. All accidents are considered attributable to driver error and not vehicle speed or deficiency in the layout of the junction. The proposal will result in an increase in right turn movements at the Thistleton junction, however these are equitable to an additional right turning vehicle every 10-15 minutes during the peak period and are not considered to result in any

material changes to the operation or highway safety of the junction. Visibility at the junction is also reported to have no deficiencies and that a bid is currently with Highways England for improvements to the junction, including signage and road marking improvements.

With regards to the highway assessment of the proposal, Highways England (HE) consider impact of the proposal on the A585 trunk road, LCC Highways are responsible for all other roads.

LCC Highways comment that no objections were raised to the previous application, subject to condition and financial contribution to bus service enhancement. The Highway Authority has considered the additional impact of the Copp Lane approval (16/0846), and conclude that there will not be any significant impact on highway safety or capacity on the local network. The vehicular access arrangement is supported.

There are known issues with the Thistleton junction with the A585, with congestion arising due to vehicles, particularly those turning right, finding it difficult to enter onto; or to cross over the A585(T). This also results in safety concerns as drivers seek to enter the A585(T) due to insufficient gaps in moving traffic. An increased number of vehicles using this junction in the future would therefore be likely to exacerbate these issues.

Calculations presented in the Technical Note demonstrate that the development could generate between 15 and 16 trips that would use the Thistleton junction in the AM or PM peak hours, equating to an additional vehicle every 3 to 4 minutes. Accident analysis presented within the TN found that 11 accidents occurred at the junction between 2011 to October 2016, 6 of which were in 2016. 9 of the incidents involved vehicles using and making turning manoeuvres at the junction and 8 occurred outside of peak times. HE conclude that this is due to inadequate gap acceptance by drivers at the junction to enter onto the A585 mainline or cross it and this occurs throughout the daytime periods, which is a reflection of how heavy the A585 route flows can be throughout the day.

This impact is reported in the TN to not result in any material change to the operation or safety of the junction. This is disputed by the HE who comment, the risk of incidents happening at the junction will undoubtedly increase incrementally as development comes forward. Notwithstanding this, HE raise no objection to the proposal on the basis that it would possibly raise the risk only marginally. In making this judgement, HE gives weight to the fact that the proposal of 50 dwellings is within the agreed housing allocation for Elswick within the Submission Version Fylde Local Plan. As a result, HE do not raise objection to this application subject to a condition requiring a Travel Plan.

HE have raised concern that the incremental development (over 300 dwellings) coming forward in this area is cumulatively and significantly increasing the number of turning movements at the Thistleton junction, with a corresponding significant increase in risk to safety. Reference is made to 90 dwellings approved by Wyre BC on Copp Lane, 95 dwellings split between three applications in Elswick (16/0645 50 units on Beech Road, 16/0846 36 units on Copp Lane and 16/1038 9 units on West View) and a further 93 properties at Gt Eccleston (16/0650) being considered by Wyre BC. On this basis HE urge Fylde Council to consider the cumulative and negative impact on safety of all of these new developments with a view to resisting further development until a coordinated approach to infrastructure mitigation can be achieved.

Of the applications referred to by HE, 16/0846 (24 dwellings at Copp Lane, Elswick) is the only proposal to have the benefit of planning permission (subject to Legal Agreement) in Elswick, those others referred to (59 units at Beech Road and West View) have been refused. In addition, the 93 dwellings at Gt Eccleston (16/0650) referred to by HE as being approved by Wyre BC, was also refused. HE report only a marginal highway safety risk at the Thistleton junction resultant from this

current proposal, and it is considered that with the additional 24 units of the Copp Lane development this would not heighten highway safety concern to a severe level to warrant refusal of the proposal.

The development proposes pedestrian improvements through provision of footpath connectivity from the development to the existing network on Lodge Lane, a pedestrian link to Bonds Lane is also indicated on the Framework Plan. Measures to improve pedestrian linkages to the village centre have also been agreed with the applicant, this includes reduction in width of the Lodge Lane/Roseacre Road junction by alterations to kerb lines and footways. This will improve access for existing and prospective occupants to facilities and services within Elswick, enhancing sustainability of the site. LCC Highways have requested that adjacent bus stops be upgraded to provide raised boarding areas to improve accessibility for a wider range of users, this can be controlled by condition.

Elswick is accessible via a reduced bus service. Service 78 has been withdrawn due to cut backs, currently the 80 and 75A services run every two hours compared to an hourly service prior to recent cut backs. LCC Highways recommend that contributions are provided to reinstate the hourly frequency of the 78 and 80 services and have requested £250k, payable over 5 years. LCC highways have previously commented that the contribution amount would not cover the full cost of service improvements (approximately £750k).

A request for contributions to cover the full cost of service improvement is considered unreasonable and a proportional amount is therefore sought. LCC Highways requested a one off £50k contribution for the Copp Lane development (24 units) and it is considered that the current £250k contribution request is not consistent with this position. On this basis, notwithstanding the Highway Authority request, to be consistent with approved development it is considered that in this circumstance a £100k contribution should be required. Members should note that if the full contribution is not secured from other development it is extremely unlikely that LCC would be able to find the shortfall. As such a review of what improvements could be provided would need to be made by the Highway Authority. A request for the upgrade of adjacent bus stops has been made through provision of raised boarding areas and road markings to the north bound stop, and relocation/ improvement of the south bound stop adjacent to the Highbury Gate which can be controlled by condition.

The TA makes reference to submission of a Construction Traffic Management Plan (CTMP) in order to manage the impact of the construction traffic on the highway network. The CTMP will consider elements such as parking for operatives and visitors, loading and unloading and storage of materials, vehicular routes to the site and wheel wash facilities. LCC Highways have raised concern to the effect of HGV's in the area associated to the Fracking proposals, and whilst not objecting to construction of this proposal, do consider that a CTMP would be beneficial. A condition requiring approval of a CTMP is suggested.

Whilst the highway concerns of residents is noted, in light of the LCC Highways and Highways England assessment of the proposal it is considered that the development provides for a safe and suitable access and that impact on the network would not be severe, in accordance with the development plan and NPPF.

Parking:

The planning application is made in outline form with detailed assessment of parking provision being reserved for subsequent application. The submission does not provide a detailed layout of plots and proposed parking arrangements cannot be assessed at this time. Notwithstanding this, Policy HL2 and TL5 are require that residential development provides for appropriate car parking and it is

expected that any subsequent reserved matters application is compliant with this Policy.

Flood Risk and Drainage:

The site falls entirely within flood zone 1, as defined on the Environment Agency's Flood Map. Since the site is over 1 hectare in area, a Flood Risk Assessment (FRA) has been submitted with the application, this also incorporates an Outline Drainage Strategy Report and a Permeability Assessment.

Paragraph 100 of the NPPF states that *"inappropriate development in Flood Zones 2 and 3 should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere"*. Policy EP30 states that development will not be permitted which would be subject to an unacceptable risk of flooding or create an unacceptable increase in the risk of flooding within the development site, or elsewhere. Policy EP25 stipulates that development will only be permitted where foul sewers and sewerage treatment facilities of adequate design and capacity are available to meet additional demand or their provision can be secured as part of the development. Policies CL1 and CL2 of the SV reflect EP25 and EP30, and encourage use of sustainable urban drainage systems.

Residents have raised concern with regards to reported flooding at the junction of Mill Lane/ Lodge Lane providing photos to demonstrate, reference is also made to flooding on site from overtopping of the pond, water retention on site including standing water and boggy ground. Concern is also raised to the accuracy of the submitted Flood Risk Assessment.

The FRA indicates that closest surface water features is the pond located centrally on the site, United Utilities have a combined sewer on Lodge Lane and Ash Lane and sewers within Ash Close and Linden Fold. It confirms the site to be in Flood Zone 1 'Low Probability', is not at risk from flooding and that surface water flooding does not pose a significant risk to the development. The FRA concludes that ground investigation and percolation testing has confirmed that the site is not suitable for an infiltration based sustainable urban drainage system (SUDS). Surface water drainage will therefore be stored and attenuated using a range of SUDS storage techniques including detention basins, attenuation ponds, geocellular crates and flow control chambers.

Members should note that the detailed drainage design cannot be determined until reserved matters stage, though an indicative drainage strategy has been outlined in the FRA.

The proposal has been considered by the Lead Local Flood Authority, Environment Agency and United Utilities who have not raised objection to the proposal, but do require specific conditions to be attached to any subsequent approval notice. Such conditions include submission of a detailed drainage strategy to ensure that the rate of surface water discharge from the site does not exceed the pre-development (greenfield) run off rate, that separate systems are installed for the discharge of foul and surface water, detail of finished floor levels, provision of pond/ detention basin prior to main construction phase, and that appropriate management and maintenance plans are put in place in respect of any sustainable drainage system. On this basis, whilst the concerns of residents is noted, it is considered that adequate measures can be put in place in order to ensure that the development poses no unacceptable risk in terms of flooding in accordance with the development plan and NPPF.

Ecology

Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. Paragraph 118 states that local planning authorities should aim to

conserve and enhance biodiversity, if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused, opportunities to incorporate biodiversity in and around developments should be encouraged.

The site has no specific nature conservation designation in the Local Plan, though is within a Site of Special Scientific Interest (SSSI) impact risk zone associated with the Wyre Estuary SSSI. Policy EP15 indicates that development affecting the integrity of a designated European Site will not be permitted. Policy EP16 states that development proposals within or likely to prejudicially affect SSSIs will not be permitted unless damaging impacts on the nature conservation interest of the site can be appropriately avoided or mitigated. Policy EP18 encourages the retention/replacement of existing natural features and the introduction of additional features as part of the development in order to provide biodiversity enhancements. Policy EP19 identifies that development which would have an adverse impact upon species specifically protected under schedules 1, 5 or 8 of the wildlife and countryside act 1981, (as amended) or their habitats will not be permitted. Policies ENV1 and ENV2 of SV reflect this current policy position.

Residents have raised concern to the development impinging on the current ecological value of the site, including use of the field and pond by wildlife such as ducks and swans, as a breeding ground for frogs and newts, with trees and hedgerows being prime nesting sites and refuge for bats and woodpeckers.

An ecology survey has been submitted in support of the application. The survey indicates desktop bird records obtained from LERN and Fylde Bird Club show no SPA, Ramsar or SSSI wintering bird species have been recorded within the 1km grid square where the site is located. The survey concludes that development will not impact upon the populations of wintering birds at Wyre Estuary SSSI and Morecambe Bay SPA/Ramsar. Given the location of the development in relation to the SSSI and SPA/Ramsar it is considered that development proposals will not have any direct impact as works will have no direct effect on the SSSI and it is not considered that any indirect impacts will occur (through increased visitor pressure, etc.) given that the SSSI is 3.5km away from the site. Natural England concur with the report findings, commenting that the application is not likely to result in impacts on statutory designated nature conservation sites or landscapes. GMEU also accept these findings and no further measures are required.

The dominant grassland habitat within the site was noted to be of moderate ecological value at the time of survey. The pond, hedgerows and trees around the boundaries are also of value as they provide good foraging, nesting, commuting and sheltering opportunities for a range of common and widespread fauna. Retention of important habitats including pond, trees and hedgerows is suggested and has been provided in the indicative layout. New landscaping of the site should provide for the native replacement of trees, scrub, wild flower area and hedgerow, retained trees and hedgerow should be protected during the construction phase.

Trees on site have been surveyed for bats and additional survey work has been undertaken. A number of trees must be felled to facilitate the access arrangement, but these trees have not been assessed to be Category 1 'with features suitable to support roosting bats'. GMEU comment that bat activity is primarily associated with foraging along the hedgerows and pond which are to be retained, the main species present being common pipistrelle. Given the retention of most of these features there is unlikely to be significant impacts on bat activity as a result of the proposal. Precautionary measures, nesting opportunities for birds and bats have been recommended and should be conditioned.

The site provides suitable nesting habitat for a range of bird species that use hedges, scrub and trees. The grassland also provides habitat for ground nesting birds. Any works that affect these features during the nesting season has the potential to disturb nesting birds. All birds in the UK are protected while undertaking nesting activities under the *Wildlife and Countryside Act 1981 (as amended)*, site clearance/ set up should therefore be avoided during this period unless further survey demonstrates otherwise. This can be controlled by condition. The site provides suboptimal habitat for wintering birds. Wintering birds would not be interested in the pond on site and prefer more open fields away from sources of disturbance. There is much more optimal habitat of this nature for wintering birds in the surrounding area. Adjacent residential development and road noise is likely to cause disturbance to these bird species. Taking into account the nature of the habitats on site and the desktop results from Fylde Bird Club there are no implications for development with regards to wintering birds. GMEU accept these findings and no further measures are required.

Ponds on and adjacent to the site have been sampled for great crested newt eDNA. All samples were found to be negative confirming that none of the ponds had been used for breeding by great crested newts during the 2015 breeding season. GMEU comment that it appears that the historic population of great crested newts is no longer breeding on the site. This does not preclude GCN from terrestrial habitat, but of the ponds not surveyed only one is close to the application site, the remainder sufficiently distant, combined with partial barriers to reduce the risk to an acceptable level. There is a road acting as a barrier between the closer pond and the application site. Given this barrier, associated risk to GCN from the development is categorised low and the Ecology Statutory Consultation response advises that no further survey work is necessary, subject to use of reasonable avoidance measures.

There are no records of badgers, water vole or otters within 1km of the site and there was no evidence of such during the extended Phase 1 habitat survey. The site has some foraging value for reptiles, however, there is limited sheltering and hibernation habitat and there are no reptile records. GMEU accept these findings.

The ecology survey demonstrates that the development is capable of being carried out without adversely affecting important habitats and species on/adjacent to the site. Features of ecological significance are capable of being retained, replaced or introduced as part of the scheme in order to provide appropriate mitigation, biodiversity enhancements, and to ensure that the development does not affect the favourable conservation status of protected species. This can be achieved through the imposition of appropriate conditions, as recommended above. Indeed GMEU have no objection to the proposal subject to condition, and Natural England has no comment to make. The proposal is therefore in accordance with the objectives of the development plan and the NPPF.

Trees

There are a number of trees on the site which afford amenity value to the locality, though are not protected by Tree Preservation Order. Policy EP12 states that trees and hedgerows which individually or in groups make a significant contribution to townscape or landscape character will be protected. Policy GD7 of the SV seeks to protect existing landscape features.

The majority of trees and hedgerow to the site periphery are indicated to be retained within the development. Notwithstanding this, a number must be felled to facilitate provision of the new vehicular access from Mill Lane. The application is supported by an Arboricultural Impact Assessment (AIA) which states that the site can be developed without significant tree loss and majority of hedgerow can be retained, it is not considered that the trees to be removed will detract significantly from the character of the area. The AIA recommends that root protection areas (RPA) inform the detailed site layout with inbuilt stand-off distances to ensure trees can grow without

conflict to housing, services should also avoid RPA's. A detailed AIA should also be submitted with the reserved matters application, as well as replacement planting within the scheme.

The Tree Officer disagrees with the AIA, and considers trees are of lower value due to their health. Comments state that 'the current screen of trees cannot be relied upon to remain for an indefinite period and suggests a substantial buffer plantation around the site so that the successor trees are growing in readiness for when the existing ones have to be removed. On this basis the proposal is considered to accord with Policies EP12 and GD7, subject to protection of retained trees and hedgerows, and provision of additional tree planting within the development which can be controlled by condition.

Heritage

Elswick Memorial United Reformed Church is located approximately 60m to the south of the application site on Lodge Lane. According to the Historic England web site, the Robert Moss Gravestone and the Old Congregational Chapel located within the grounds of the church are Grade II Listed. Paragraphs 132 and 133 of the NPPF make clear that any development causing substantial harm or total loss to the significance of a designated heritage asset (including its setting) should be refused, other than in exceptional circumstances. This approach is supported by FBLP Policy EP4 and ENV5 of SV which states that development which would harm the setting of a listed building will not be permitted.

The Grade II heritage assets are located approximately 60m to the south, on a similar land level to the application site. There are two dwellings with associated garden curtilage located opposite the Assets on Lodge Lane, which act to obscure a direct line of site between the Assets and the application site. Glimpsed views may be obtained, but are interrupted by the presence of this housing and tree planting to the southern boundary of the application site on Mill Lane. The County Archaeologist has not raised any objection to the proposal.

On this basis it is not considered that the development would have any harmful impact, nor would it diminish significance on the setting of the listed heritage assets, in accordance with the development plan and NPPF.

Other issues

Open space:

Policy TREC 17 of the FBLP and ENV4 of the SV supports new residential development subject to the provision of amenity open space (including facilities for children's play where appropriate) in accordance with standards relevant to the number of bedrooms within each dwelling provided. The outline nature of the application means that there can be no clarity on this matter, however the illustrative layout shows areas of open space within the development.

There is one equipped play area (EPA) serving the needs of Elswick residents, located to the south of the Village on Roseacre Road, and is approximately 300m from the application site. Some existing residents must walk a greater distance to access the facility. Provision is also required for a play area within the Copp Lane development some 400m to the north. This is a substantial distance for families of the development to walk and provision of such within the scheme would therefore be of benefit to prospective occupants, as well as existing residents. There is sufficient space within the POS to accommodate a play area, such as a Local Area for Play (LAP), and given the lack of facilities within walking distance, the requested is considered justified.

Affordable housing

Paragraph 50 of the NPPF requires affordable housing to be provided where needs have been identified. Policy H4 of the SV requires a 30% provision of affordable housing in new development, being based on The Fylde Coast SHMA 2014 which sets out the need for affordable housing in the Borough.

The Council's Strategic Housing team have commented on the application and support the development subject to provision of 30% affordable housing on the site. If members are minded to approve the scheme, the Applicant will have to enter into a Section 106 Legal Agreement to ensure provision of 30% affordable dwellings within the development. The Legal Agreement will secure the contribution amount and any required phasing of the payment. Given the outline nature of development, the contribution will be reassessed once accurate bedroom information becomes available.

Education

It is expected that development provides for any identified shortfall in local education provision. Policy CF2 of the FBLP and INF2 are of relevance and place such a requirement on development.

The response from LCC Education confirms that there is a shortfall of secondary school capacity in the area, with a deficiency of 80 places at the closest school of Hodgson Academy by 2020. The development will result in a pupil yield of 8 secondary school places, and given the shortfall of capacity a financial contribution equivalent to 8 secondary school places (£171,386.16) has been requested. The contribution will be used to provide additional secondary places at Hodgson Academy.

It should be noted that there is no requirement for contribution toward primary school provision since there is sufficient capacity within existing schools to cater for the demand created.

Conclusions

The development falls outside the settlement boundary of Elswick, representing encroachment into the countryside and is therefore contrary to Policy SP2 and GD4, which act to restrict residential development within such areas. Notwithstanding this, the Council cannot demonstrate a five year supply of housing land and Policies SP2 and GD4 are in conflict with the NPPF. Consequently these policies are out-of-date and the principle of residential development cannot be resisted.

The most recent adopted 5 Year Housing Supply figure was a 4.8 year supply as of 31st March 2016. For the purposes of the Examination, the supply figure has most recently been revised to demonstrate a 5.1 year supply though Members should note that this figure is subject to further public consultation during the summer and is yet to be tested by the Examination. The Examination is also considering objection relating to Elswick as a Tier 2 Rural Settlement and the amount of housing provision in Elswick. Relevant emerging policies therefore carry limited weight. On this basis the figure of 50 dwellings referenced in policy SL5 cannot, at this time, be relied upon to restrict or support housing development in Elswick.

The proposed development, would result in an expansion of the village in the order of approximately 11% (21% when added to committed development) in a location on the edge of the settlement boundary which relates well to the existing built-up edge of Elswick and existing shop, services, and public transport facilities available within the village. Accordingly, the scheme is considered sustainable and would not result in the introduction of isolated homes in the countryside. Nor would it have any significant adverse effects on landscape character or quality and appropriate mitigation can be introduced as part of the scheme in order to minimise impact. The development would not

result in any significant loss of the Borough's best and most versatile agricultural land and there are no other landscape designations to restrict its development for housing.

Whilst the development would result in encroachment into the countryside, it would make a valuable contribution to the delivery of new housing in the Borough with the added benefit of 30% affordable housing on the site. It is also considered that sustainable housing development should be supported in order to maintain a 5 year supply, irrespective of location, as failure to do so would increase risk of the Council not being able to demonstrate a 5 year supply in the future.

Therefore, on balance, given the sustainability of the development it is considered that the benefits arising outweigh the limited harm which has been identified in visual and landscape terms and, accordingly, that the principle of development is acceptable.

The development provides for satisfactory access to the site and there is sufficient capacity to ensure that the level of traffic generated by the development would not have a severe impact on the safe and efficient operation of the surrounding highway network. The scheme would result in an acceptable relationship with surrounding uses and appropriate mitigation can be provided to ensure that the development would have no adverse impacts in terms of ecology, flooding and drainage. The proposal would not affect the significance of any heritage assets in the locality and appropriate contributions would be secured to make the development acceptable in planning terms.

The proposed development is therefore in accordance with the requirements of the relevant policies of the National Planning Policy Framework and the Development Plan.

Recommendation

That the authority to GRANT planning permission be delegated to the Head of Planning and Regeneration on completion of a Section 106 agreement that will secure:

- provision, retention and operational details for 30% of the proposed dwellings to be affordable properties.
- a contribution and phasing of its payment towards addressing the shortfall of secondary education capacity to serve the occupants of the development. This is expected to be £171,386.16, to provide 8 secondary places at Hodgson Academy, or such other education institution the Head of Planning and Regeneration in consultation with the Local Education Authority considers appropriate, with the agreement also clarifying the phasing of its payment.
- a contribution of £100,000 payable prior to occupation of the 25th dwelling on the site, towards enhancements of the local bus services to serve the village and provide connections to neighbouring settlements.

The agreement will be expected to meet the full amounts quoted above in all cases, unless a viability appraisal has been agreed with the Local Planning Authority that demonstrates that the payment of some, or all, of these would render the development to be unviable.

And that the planning permission be granted subject to the following conditions (or any amendment to the wording of these conditions or additional conditions that the Head of Planning & Regeneration believes is necessary to make otherwise unacceptable development acceptable):

1. Application for approval of reserved matters must be made not later than the expiration of three years from the date of this permission and the development must be begun not later than:
 - the expiration of three years from the date of this permission; or,

19. two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Reason: To comply with the requirements of section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The approval of the Local Planning Authority shall be sought in respect of the following matters before the development is commenced:

1. Layout.
2. Scale.
3. External appearance.
4. Landscaping.

Reason: The application is granted in outline only under the provisions of Article 4 of the Town and Country Planning (Development Management Procedure) Order 2015 and details of the matters referred to in the condition have not been submitted for consideration.

3. This permission relates to the following plans:

- Drawing number 15-063 LP01 (Site Location Plan).
- Framework Plan drawing number 15-063 FP02 Rev H.
- Proposed Access Arrangement drawing number 0826-F02 revision C.

Except as provided for by other conditions to this permission, any application for approval of reserved matters submitted pursuant to condition 2 of this permission shall accord with the outline permission insofar as it relates to the means of access to the site and the maximum number of dwellings.

Supporting Information:

- Utilities Assessment (Story Homes revision P1).
- Arboricultural Impact Assessment (TEP.5294.001, Planning Design Environment, March 2016).
- Residential Travel Plan (TPS, 646T_20160314, March 2016).
- Transport Assessment (CroftTransport Solutions, January 2016).
- Highway Technical Note - response to Highways England December 2016 (Croft Transport Solutions, 0826/response to highways england, December 2016).
- Highway Technical Note (Croft Transport Solutions, tsb/0826, November 2016).
- Infiltration SuDS GeoReport (GR_211882/1, GeoReports, 27th July 015).
- Flood Risk Assessment & Outline Drainage Strategy revision B (RG Parkins & Partners Ltd, 16th May 2016).
- Design and Access Statement revision E (mck associates limited).
- Planning Statement (Barton Willmore, March 2016).
- Phase II Geo-Environmental Site Assessment (e3p, 10-743-r2, September 2015).
- Phase I Geo-Environmental Site Assessment (e3p, 10-743-r1, July 2015).
- Permeability Assessment (e3p, 10-743-L1, 14th October 2015).
- Landscape & Visual Impact Appraisal revision C (TPM Landscape Ltd, March 2016).
- Ecological Assessment (Planning Design Environment, 5194.002, November 2015).
- Bat Activity Appendix 2016 (TEP, 5194.005, October 2016).
- Agricultural Land Classification (ADAS UK Ltd, PE/KH11, November 2015).

Reason: The application is granted in outline only in accordance with the provisions of Article 4 of the Town and Country Planning (Development Management Procedure) Order 2015. Access has been applied for and any application for reserved matters must be in accordance with and/or not exceed the parameters established as part of this permission.

4. Any application which seeks approval for the reserved matter of layout pursuant to condition 2 of this permission shall accord with the parameters shown on amended drawing number 15-063 FP02 revision H:

1. the developable areas of the site.
2. the areas to be laid out as open space and landscape buffer.
3. the scale of development being no greater than 2 - 2.5 storeys in height.

Reason: To ensure that any application for the approval of reserved matters accords with the parameters shown on the masterplan with respect to the developable and non-developable areas of the site in the interests of ensuring a pattern and layout of development which is sympathetic to the character and setting of the site and to minimise the development's visual impact on the surrounding landscape, in accordance with Policies HL2 and EP11 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

5. Any application which seeks approval for the reserved matter of landscaping pursuant to condition 2 of this permission shall provide for a development which demonstrates compliance with the principles of the landscape strategy indicated on drawing number 15-063 FP02 revision H. The scheme shall include, but not be limited to, the following details:

1. retention of existing trees, hedgerows and other vegetation on/overhanging the site.
2. a compensatory planting scheme to replace any trees or hedgerows to be removed as part of the development.
3. the introduction of a landscape buffer, arrival impact green and public open space to the north, south and east of the built form proposed.
4. the introduction of a play area within the development.
5. the introduction of additional planting within the site which forms part of the internal development layout and does not fall within (1) to (3).
6. the type, size, species, siting, planting distances and the programme of planting of hedgerows, trees and shrubs.

The approved landscaping scheme shall be carried out during the first planting season after the development is substantially completed and the areas which are landscaped shall be retained as landscaped areas thereafter. Any trees or shrubs removed, dying, being severely damaged or becoming seriously diseased within five years of planting shall be replaced by trees or shrubs of similar size and species to those originally required to be planted.

Reason: To ensure that a suitable landscaped buffer is introduced between the site and adjoining land in order to soften the development's visual impact on the open countryside, and to ensure the introduction of appropriate compensatory landscaping and habitat replacement as part of the development, in accordance with Policies HL2, EP10, EP12, EP14, EP18, EP19 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

6. Prior to commencement of the development hereby approved, details of finished floor levels and external ground levels for each plot shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be implemented in accordance with the approved details.

Reason: In order to ensure a satisfactory relationship between the new dwellings and between the development and surrounding buildings in the interests of residential and visual amenity and to minimise flood risk, in accordance with Policies HL2 and EP30 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

7. No development shall take place until an investigation and risk assessment has been submitted to and approved in writing by the Local Planning Authority to assess the nature and extent of any contamination on the site (whether or not it originates on the site). The assessment must be undertaken by competent persons and a written report of the findings submitted to and approved in writing by the Local Planning Authority before any development takes place. The submitted report shall include:
1. a survey of the extent, scale and nature of contamination
 2. an assessment of the potential risks to:
 - human health;
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland, and service lines and pipes;
 - adjoining land;
 - groundwaters and surface waters;
 - ecological systems;
 - archaeological sites and ancient monuments.
 3. where unacceptable risks are identified, an appraisal of remedial options and proposal for the preferred option(s) to form a remediation strategy for the site.

The development shall thereafter be carried out in full accordance with the duly approved remediation strategy and a verification report submitted to and approved in writing by the Local Planning Authority before any of the apartments hereby approved are first occupied.

Reason: To safeguard the health and safety of residents by ensuring appropriate remediation of contaminated land in accordance with Policy EP29 of the adopted Fylde Borough Local Plan (October 2005) and GD9 of the Submission Version Fylde Local Plan to 2032.

8. As part of any reserved matters application and prior to the commencement of any development, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions shall be submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage system either directly or indirectly. The development shall be completed in accordance with the approved details.

Those details shall include, as a minimum:

1. Information about the lifetime of the development, design storm period and intensity (1 in 30 & 1 in 100 year +30% allowance for climate change), discharge rates and volumes (both pre and post development), temporary storage facilities, the methods employed to delay and control surface water discharged from the site, and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters, including watercourses, and details of floor levels in AOD.
2. The drainage strategy should demonstrate that the surface water run-off must not exceed the pre-development greenfield runoff rate.
3. Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant).
4. Flood water exceedance routes, both on and off site.
5. A timetable for implementation, including phasing as applicable.
6. Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltrations rates.

7. Details of water quality controls, where applicable.

The scheme shall be implemented in accordance with the approved details prior to first occupation of any of the approved dwellings, or completion of the development, whichever is the sooner. Thereafter the drainage system shall be retained, managed and maintained in accordance with the approved details.

Reason: To ensure that the development is not at risk of flooding and does not increase flood risk elsewhere, and that adequate measures are put in place for the disposal of foul and surface water, in accordance with Policies EP25 and EP30 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

9. None of the dwellings hereby approved shall be first occupied until details of a management and maintenance scheme for the surface water drainage system to be installed pursuant to condition 6 of this permission has been submitted to and approved in writing by the Local Planning Authority. The scheme shall cover the full lifetime of the drainage system and, as a minimum, shall include:

1. arrangements for adoption by an appropriate public body or statutory undertaker, or management and maintenance by a Residents' Management Company.
2. arrangements concerning funding mechanisms for the ongoing maintenance of all elements of any sustainable drainage system (including mechanical components) to include details such as:
 - on-going inspections relating to performance and asset condition assessments;
 - operation costs for regular maintenance, remedial works and irregular maintenance of limited life assets; and
 - any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime.
 - means of access and easements for maintenance purposes;
3. A timetable for implementation.

The drainage system shall thereafter be installed in accordance with the details and timetable contained within the approved scheme, and shall be managed and maintained as such thereafter.

Reason: To ensure that satisfactory measures are put in place for the management and maintenance of any surface water drainage system throughout the lifetime of the development, to minimise the risk of flooding and to limit the potential for surcharging of the sewer network, in accordance with Policies EP25 and EP30 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

10. All detention basins and flow control devices/ structures are to be constructed and operational prior to the commencement of any other development and prior to any development phase.

Reason: To ensure site drainage during the construction process does not enter the watercourse at un-attenuated rate and to prevent the risk of flooding during the construction period, in accordance with Policies EP25 and EP30 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

11. There shall be no on site works, including site set up and the removal of any trees or shrubs until a Construction Method Statement (CMS) has been submitted to and approved in writing by the Local Planning Authority. The CMS shall include:

1. construction vehicle routes to and from the site.
2. arrangements for the parking of vehicles for site operatives and visitors.
3. details of areas designated for the loading, unloading and storage of plant and materials.
4. details of the siting, height and maintenance of any security hoarding.

Reason: In the interests of highway safety and general amenity of the area, in accordance with

Policy HL2 of the adopted Fylde Borough Council Local Plan as altered (October 2005).

12. Prior to commencement of the development hereby approved, a detailed design of the site access, including the junction of the application site with Mill Lane and junction of Mill Lane with Lodge Lane, shall be submitted to and approved in writing by the Local Planning Authority. The approved access design shall be implemented prior to commencement of the the development and retained thereafter.

Reason: To enable all construction traffic to enter and leave the site in a safe manner without causing a hazard to other road users, in accordance with Policy HL2 of the adopted Fylde Borough Local Plan (October 2005).

13. Prior to commencement of any works on the site, wheel wash facilities shall be provided within the site which will be used to clean the wheels of vehicles before leaving the site. The wheel wash facilities shall be available for use throughout the construction period.

Reason: To avoid the spread of mud and debris from the application site on to the road network, in the interests of highway safety and general amenity of the area, in accordance with Policy HL2 of the adopted Fylde Borough Council Local Plan (October 2005).

14. Prior to commencement of the development hereby approved, a scheme for the construction of off site highways shall be submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall include, but is not limited to, the following:

1. Alterations to the Roseacre Road/ Lodge Lane junction, as detailed on drawing number 0826-F02 rev C.
2. Footway improvements on Lodge Lane between the site access and Roseacre Road.
3. The upgrade of 2 existing bus stops to include raised boarding areas.

The approved scheme of off site highway works shall be implemented prior to first occupation of the development and retained thereafter.

Reason: To safeguard highway safety and ensure the efficient and convenient movement of all highway users, in accordance with Policy HL2 of the adopted Fylde Borough Council Local Plan (October 2015).

15. Prior to occupation of the development hereby approved, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include measures to encourage alternative sustainable modes of transport by prospective occupants of the development. The approved Travel Plan must be implemented in full in accordance with the timetable within it unless otherwise agreed in writing with the Local Planning Authority. All elements shall continue to be implemented at all times thereafter for as long as any part of the development is occupied for a minimum of 5 years.

Reason: To encourage the use of sustainable modes of transport by prospective occupants of the development, in accordance with Section 4 (Promoting Sustainable Transport) of the National Planning Policy Framework.

16. Prior to commencement of the development hereby approved, a scheme to protect retained trees and hedgerow during the construction period shall be submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall indicate trees and hedgerow for retention and provide for a Construction Exclusion Zone around the Root Protection Areas of those trees/hedgerows identified as being retained. The Construction Exclusion Zone shall be provided in the form of protective fencing of a height and design which accords with the requirements BS 5837: 2012 and shall be maintained as such during the entirety of the construction period.

Reason: To protect existing trees and hedgerows on or overhanging the which are to be retained

as part of the development, in accordance with Policy EP12 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

17. No clearance of trees and shrubs in preparation for or during the course of development shall take place during the bird nesting season (1st March - 31st August inclusive) unless an ecological survey has first been submitted to and approved in writing by the Local Planning Authority which demonstrates that the vegetation to be cleared is not utilised for bird nesting. Should the survey reveal the presence of any nesting species, then no clearance of trees and shrubs shall take place until a methodology for protecting nest sites during the course of the development has been submitted to and approved in writing by the Local Planning Authority. Nest site protection shall thereafter be provided in accordance with the duly approved methodology.

Reason: In order to prevent any habitat disturbance to nesting birds, in accordance with Policy EP19 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

18. On site works shall only take place between the hours of:

08:00 - 18:00 Monday to Friday.

09:00 - 13:00 Saturday.

No on site works on Sundays or Bank Holidays.

Reason: To safeguard the amenity of neighbouring residents, in accordance with Policy HL2 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

19. Prior to commencement of the development hereby approved, a scheme for the control of noise, vibration and dust during the period of construction shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be used throughout the construction process.

Reason: To protect the amenity of neighbours of the development, in accordance with Policies HL2 and EP26 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

20. Prior to commencement of the development hereby approved, an Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The content of the plan must include:

1. on site mitigation for loss of semi improved grassland.
2. on site mitigation for any changes to the open water habitat on site, to include full design details for any alterations to the pond.
3. replacement trees and hedgerows on the site.
4. enhancement of retained hedgerows on or overhanging the site.
5. provision of bat and bird boxes within the development.
6. lighting scheme to avoid lighting to the pond and immediate surrounding vegetation.
7. a five year implementation and management plan.

The approved planting will be implemented in accordance with the approved details during the first planting season after the development is substantially completed. Any trees or hedgerow removed, dying, being severely damaged or becoming seriously diseased within five years of planting shall be replaced by trees or shrubs of similar size and species to those originally required to be planted. The approved bat/ bird boxes and lighting shall be implemented prior to last occupation of the development and be retained on the site in perpetuity.

Reason: To ensure adequate mitigation for the loss of habitat resultant from the development, in accordance with Policies HL2, EP18 and EP19 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

21. There shall be no on site works, including site set up and the removal of any trees or shrubs, until a Reasonable Avoidance Measures (RAM) method statement for amphibians has been submitted to and approved in writing by the Local Planning Authority. The method statement shall outline the RAM measures to safeguard amphibians during any on site works associated to the development. The approved statement shall be implemented for duration of the construction period.

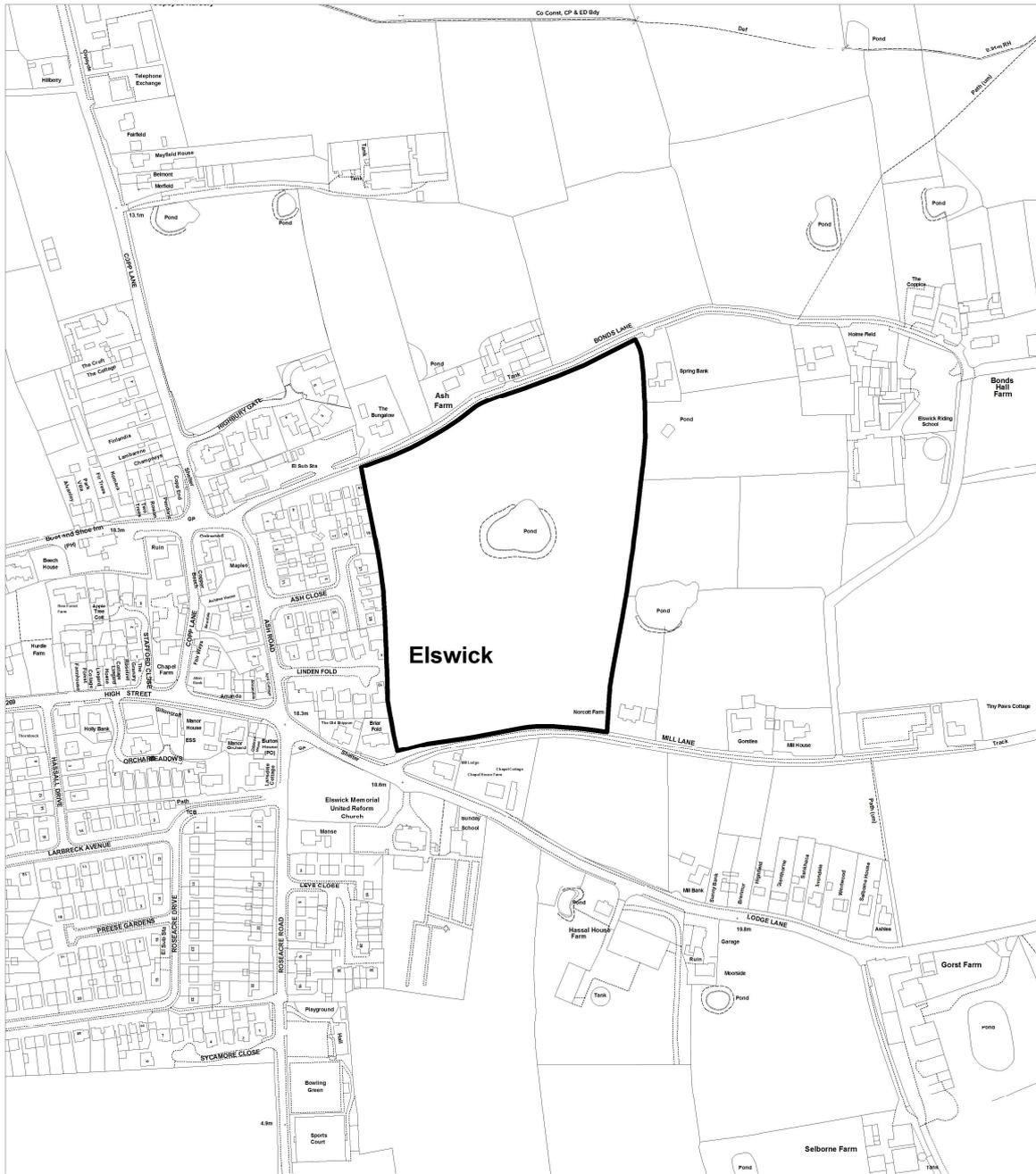
Reason: To safeguard features of ecological interest on the site during the construction period, in accordance with Policies EP18 and EP19 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

22. The development shall be carried out in accordance with paragraph 4.0 of the Bat Activity Appendix 2016 (TEP, 5194.005, October 2015), unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard features of ecological interest on the site during the construction period, in accordance with Policies EP18 and EP19 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

23. Prior to commencement of the development hereby approved, details shall be submitted to and approved in writing by the Local Planning Authority of the on-going maintenance of the communal areas of public open space, play area and amenity landscaping. The development shall thereafter be maintained in accordance with the approved schedule of maintenance, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development is implemented and maintained to a satisfactory degree into the future, in accordance with Policy HL2 of the adopted Fylde Borough Local Plan (October 2005).



<p>Development Services Fylde Council</p>		<p>(c) Crown Copyright and database right (2017). Ordnance Survey (10006084).</p>	
<p>Application No. 5/17/0247</p>	<p>Address Land north of Mill Lane, Elswick</p>	<p>Grid Ref. E.3423 : N.4385</p>	<p>Scale 0 20 40 60 80 m</p>

APPENDIX E – ADMISSIONS POLICY GREAT ECCLESTON COPP C OF E SCHOOL

**Great Eccleston Copp CE School
DETERMINED ADMISSION ARRANGEMENTS
For September 2017**

Making an application

Applications for admission to the school for September 2017 should be made on-line at www.lancashire.gov.uk (search for School Admissions) between September 2016 and 15th January 2017. It is not normally possible to change the order of your preferences for schools after the closing date.

Parents **must** complete the Local Authority electronic form, stating three preferences. Parents who wish their application to this Church school to be considered against the faith criteria **should** also complete the supplementary form. If the school is oversubscribed, a failure to complete the supplementary form may result in your application for a place in this school being considered against lower priority criteria as the Governing Body will have no information upon which to assess the worship attendance.

Applications should be made on-line on the common application form; the Diocesan Supplementary Form appears when you click "Submit". It should be printed off and handed in to the appropriate school or schools.

Letters informing parents of whether or not their child has been allocated a place will be sent out by the Local Authority on 16th April 2017. Parents of children not admitted will be informed of the reason and offered an alternative place by the Authority.

Admission procedures

Arrangements for admission have been agreed following consultation between the governing body, the Diocesan Board of Education, Local Authorities and other admissions authorities in the area.

The number of places available for admission to the Reception class in the year 2017 will be a maximum of 30.

The governing body will not place any restrictions on admissions to the reception class unless the number of children for whom admission is sought exceeds their admission number. By law, no infant class may contain more than thirty children. The Governing Body operates a system of equal preferences under which they consider all preferences equally and the Local Authority notifies parents of the result. In the event that there are more applicants than places, after admitting all children with a Statement of Educational Need or Health and Care Plan naming the school, the governing body will allocate places using the criteria below, which are listed in order of priority.

1. (a) Children in public care and previously looked after children.

This includes any "looked after child", "previously looked after children" and any child who was previously looked after but immediately after being looked after became subject to an adoption, residence or special guardianship order. . 'Looked after' means that the child was (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions.

(b) Children with special medical or social circumstances affecting the child where these needs can only be met at this school.

Professional supporting evidence from a professional, e.g. a doctor, psychologist, social worker, is essential if admission is to be made under the criterion for special medical or social circumstances, and such evidence must set out the particular reasons why the school is question is the most suitable school and the difficulties which would be caused if the child had to attend another school.

2. Children who have a sibling attending the school on the date of application and on the date of admission.

NOTE: Siblings include step, half, foster, adopted brothers and sisters living at the same address.

3. Children whose parents live within the ecclesiastical parish of St. Anne's Church, Copp, Great Eccleston and Elswick, Little Eccleston with Larbreck

- a) **Children with a parent/guardian worshipping in a church in membership of Churches Together in England.**
- b) **Other children.**

NOTE: A map showing the boundaries is available in school

NOTE: Churches Together in England is taken on the 1st September 2015. A list may be obtained from its website or from the school.

Parental worshipping is normally taken to mean a minimum of monthly attendance at church at public worship for over at least six months. The relevant date is 1st September 2016.

The governors will request confirmation of this from the relevant member of the clergy or church officer. Where a family has changed churches, then information about all of them will be required.

4. Children whose parents/guardians live outside the ecclesiastical parish of St. Anne's Church, Copp, Great Eccleston and Elswick, Little Eccleston with Larbreck

- a) **Children with a parent/guardian worshipping in a church in membership of Churches Together in England.**
- b) **Other children.**

Tie break

Where there are more applicants for the available places within a category, then the distance between the Ordnance Survey address points for the school and the home measured in a straight line will be used as the final determining factor, nearer addresses having priority over more distant ones. This address point is within the body of the property and usually located at its centre. Where two addresses have the same distance, or the cut-off point is for addresses within the same building, then the Local Authority's system of a random draw will determine which address(es) receive the offer(s).

Admissions information:

In 2015, there were 16 applications for 30 places *[2016 details are not yet available]*

Late applications for admission

Where there are extenuating circumstances for an application being received after the last date for applications, and it is before the governors have established their list of pupils to be admitted, then it will be considered alongside all the others.

Otherwise, applications which are received after the last date will be considered after all the others, and placed on the waiting list in order according to the criteria.

Waiting list

Where we have more applications than places, the admissions criteria will be used. Children who are not admitted will have their name placed on a waiting list. The names on this waiting list will be in the order resulting from the application of the admissions criteria. Since the date of application cannot be a criterion for the order of names on the waiting list, late applicants for the school will be slotted into the order according to the extent to which they meet the criteria. Thus it is possible that a child who moves into the area later to have a higher priority than one who has been on the waiting list for some time. If a place

becomes available within the admission number, the child whose name is at the top of the list will be offered a place. This is not dependent on whether an appeal has been submitted.

This waiting list will operate for the full autumn term.

Address of pupil

The address used on the school's admission form must be the current one at the time of application, i.e. the family's main residence. If the address changes subsequently, the parents should notify the school. Where the parents live at different addresses, and there is shared parenting, the address used will normally be the one where the child wakes up for the majority of Monday to Friday mornings. If there is any doubt about this, then the address of the Child Benefit recipient will be used. Parents may be asked to show evidence of the claim that is being made for the address, e.g. identity cards of various sorts showing the child's address as the one claimed. Where there is dispute about the correct address to use, the governors reserve the right to make enquiries of any relevant third parties, e.g. the child's GP, Council Tax Office, Electoral Registration Officer, utilities provider. For children of UK Service personnel and other Crown Servants returning to the area proof of the posting is all that is required.

Non-routine or in-year admissions

It sometimes happens that a child needs to change school other than at the "normal" time; such admissions are known as non-routine or in-year admissions. Parents wishing their child to attend this school should arrange to visit the school. They will be provided with an application form once they have a definite local address. If there is a place in the appropriate class, then the governors will arrange for the admission to take place. If there is no place, then the admissions committee will consider the application and information about how to appeal against the refusal will be provided. Appeals for children moving into the area will not be considered until there is evidence of a permanent address, e.g. exchange of contracts or tenancy agreement with rent book.

Please note that you cannot re-apply for a place at a school within the same school year unless there has been relevant, significant and material change in the family circumstances.

Appeals for routine admissions

Where the governors are unable to offer a place because the school is over subscribed, parents have the right to appeal to an independent admission appeal panel, set up under the School Standards and Framework Act, 1998, as amended by the Education Act, 2002. **Parents should notify the clerk to the governors at the school by; to follow.** Parents will have the opportunity to submit their case to the panel in writing and also to attend in order to present their case. You will normally receive 14 days' notice of the place and time of the hearing.

Appeals which are received after the deadline will be slotted into the schedule where this is possible. There is no guarantee that this will happen and late appeals may be heard after the stipulated date at a second round of hearings. The schedule is subject to change depending upon the availability of appeal panel members, clerks, venues and the number of appeals for each school (which will vary year on year).

Please note that this right of appeal against the governors' decision does not prevent you from making an appeal in respect of any other school.

Fraudulent applications

Where the governing body discovers that a child has been awarded a place as the result of an intentionally misleading application from a parent (for example a false claim to residence in the catchment area or of involvement in a place of worship) which effectively denies a place to a child with a stronger claim, then the governing body is required to withdraw the offer of a place. The application will be considered afresh and a right of appeal offered if a place is refused.

Deferred admission

If your child is due to start school during the next academic year, it is important that you apply for a place for September. If your child's fifth birthday is between the months of September and December, then, if you wish it, admission may be deferred until January; if it is between January and April, then admission may be deferred until the start of the summer term though it is likely to be in your child's interest to start no later than January. You may also request that your child attend school part time until he/she reaches his/her fifth birthday.

Admission of children outside of their normal age group

Parents may seek a place for their child outside of their normal age group, for example, if a child is gifted and talented or has experienced problems such as ill health. In addition, the parents of a summer born child¹ may choose not to send that child to school until the September following their fifth birthday and may request that they are admitted out of their normal age group – to reception rather than year 1. Admission Authorities **must** make clear in their admission arrangements the process for requesting admission out of the normal age group.

Admission authorities **must** make decisions on the basis of the circumstances of each case and in the best interests of the child concerned. This will include taking account of the parent's views; information about the child's academic, social and emotional development; where relevant, their medical history and the views of a medical professional; whether they have previously been educated out of their normal age group; and whether they may naturally have fallen into a lower age group if it were not for being born prematurely. *They **must** also take into account the views of the head teacher of the school concerned. When informing a parent of their decision on the year group the child should be admitted to, the admission authority **must** set out clearly the reasons for their decision.*

Where an admission authority agrees to a parents' request for their child to be admitted out of their normal age group and. As a consequence of that decision, the child will be admitted to a relevant age group (ie the age group to which pupils are normally admitted to the school) the local authority and admission authority **must** process the application as part of the main admissions round, unless the parental request is made too late for this to be possible, and on the basis of their determined admission arrangements only, including the application oversubscription criteria where applicable. They **must** not give the application lower priority on the basis that the child is being admitted out of their normal age group. Parents have a statutory right to appeal against refusal of a place at a school for which they have applied. *This right does not apply if they are offered a place at the school but it is not in their preferred age group.*

Twins, etc

Where there are twins, etc wanting admission and there is only a single place left within the admission number, then the governing body will exercise as much flexibility as possible within the requirements of infant class sizes. In exceptional circumstances cases we are now able to offer places for both twins and all triplets, even when this means breaching infant class size limits.

¹ The term summer born children relates to all children born from 1 April to 31 August. These children reach compulsory school age on 31 August following their fifth (or on their fifth birthday if it falls on 31 August) It is likely that most requests for summer born children admitted out of their normal age group will come from parents of children born in the later summer months or those born prematurely

**Diocesan Supplementary Information Form
Admission to primary school, 2017**

Great Eccleston Copp Church of England Primary School

Name of child:

Surname **Christian names**

Date of birth Boy Girl

Name of parent/guardian

Address

.....

.....

Post code

Contact telephone number

If you are applying to this school on faith grounds, please complete the following sections:

Place of worship one of parents / guardians regularly attends:

Name of place of worship

Address

.....

Name of vicar / priest / minister / faith leader / church officer:

.....

Address

.....

.....

Post code Telephone

Your faith leader will be contacted in order to provide the information.

Return this form to the school before 15th January 2017.

This form is for use of the School; it will be sent to the appropriate faith leader, to be returned direct to the school.

**Clergy Reference Form
Admission to primary school, 2017**

Great Eccleston Copp Church of England Primary School

Name of child:

Surname **Christian names**

Date of birth Boy Girl

Name of parent/guardian

Address
.....
.....

Post code

Contact Telephone

This parent has given your name as a reference for his/her commitment to the church/place of worship.

Our criteria require the parent to have attended their place of worship monthly for six months prior to 1st September 2016.

Has this been the pattern for this parent? YES / NO

Signed

Name Date:

.

Position

Church

Please return this form to Great Eccleston Copp CE School

By 28th February 2017.

**APPENDIX F – EMAIL FROM HEADTEACHER OF GREAT ECCLESTON COPP C OF E
SCHOOL**

From: 2024, head [<mailto:head@coppschool.lancs.sch.uk>]
Sent: 27 June 2017 17:08
To: David Hayward
Subject: Re: Copp C of E School

Hello David

Further to our telephone call today and the proposal about housing in Elswick, I would like to confirm that, currently, we have 130 children on roll at Great Eccleston Copp School.

We actually have places for 210 children, so we are presently under-subscribed. This trend will continue for at least the next year, as we have currently 7 children starting in Reception Class in September.

The majority of our pupils come from Great Eccleston or Elswick; as of today's date, we have 58 children listed as living in Elswick.

It goes without saying that more homes in Elswick would be good for the school, as this would attract more children and, therefore, help with our budget, which means that we would be able to resource our school much better.

Kind regards

Beverley Melvin

Beverley Melvin
Headteacher
Great Eccleston Copp CE Primary School
01995 670969

From: David Hayward <David.Hayward@storyhomes.co.uk>
Sent: 26 June 2017 16:39:30
To: 2024, head
Subject: Copp C of E School

Dear Beverley

I have tried calling the number for the school and have left a message for you to call me back. You may recall that we met in October 2015 at the Story Homes public exhibition for our proposed development site in Elswick. I wanted to update you on where we were at with the application as it has an impact on the school in terms of pupil numbers.

I would therefore be very grateful if you could give a me a call back when you receive this message.

Regards

David

David Hayward BA (Hons) AssocRTPI

Planner

Story Homes Ltd

Story House, Lords Way, Kingmoor Business Park, Carlisle CA6 4SL

t: 01228 404550 | d: 01228 891566 | m: 07912 558365

www.storyhomes.co.uk



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