



Partial Review of the Fylde Local Plan to 2032

**Text of Representations
Made Under Regulation 20
in Policy Order**

October 2020

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1. Introduction

- 1.1 This document has been produced to provide the full text of the representations made in response to the Partial Review of the Fylde Local Plan to 2032 (FLP32) consultation. It accompanies the Partial Review of the FLP32 , along with all the other submission documents, at the submission of the plan to the Secretary of State for Examination in Public.
- 1.2 This document has been produced in support of other documents produced under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is in accordance with recommended good practice contained in the Planning Inspectorate's Procedure Guide for Local Plan Examinations (June 2019).

2. Text of Representations in Policy Order

- 2.1 Representations are set out in the order of policies and paragraphs as they appear in the Partial Review of the FLP32 Schedule of Revisions.
- 2.2 In this document, the full text of the main body of each representation is reproduced, including quotations made from other documents, national policy etc where these appear within the body of the text. However, for sake of clarity, footnotes, maps, other graphics and appendices are not reproduced. These are available as part of the original representations within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document) which also forms part of the submission.
- 2.3 Table 1 sets out the content of the representations, divided in accordance with the policy or paragraph number where these have been specified by the respondent. Where these have not been specified, the Council has judged which is the most appropriate policy or paragraph under which to display the content. In a small number of cases, it has been necessary to repeat the content under more than one policy or paragraph, although this has been avoided unless considered wholly necessary.
- 2.4 Content received which does not relate directly to the proposed revisions set out within the Schedule of Revisions is omitted from Table 1 but is included in Table 2 in Section 3 of this document.
- 2.5 In the case of the representation received from Gladman Developments, the representation was received as the pdf of a scanned image file. The text has been extracted from the response using an optical character reader (OCR) program. Any discrepancies with the original text arising from this are regretted: the original representation is included in the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document) for reference.

Table 1: Text of Representations in Policy Order

Respondent	Text of Representations
Non-specific comments	
Highways England	<p>Thank you for consulting Highways England on the published Partial Review of the Fylde Local Plan to 2032 (PRFLP32).</p> <p>There are no particular comments or observations that Highways England feels that it needs to make regarding the published Partial Review.</p> <p>Please contact me if you would like to discuss anything about this email.</p>
Network Rail	<p>Network Rail has no comments.</p>
Canal & River Trust	<p>Thank you for your consultation on the above partial review of the Flyde [<i>sic.</i>] Local Plan to 2032</p> <p>The Canal & River Trust (the Trust) only own and manage a small part of the Lancaster Canal which passes through the Borough, in generally rural locations not subject to significant development proposals.</p> <p>[Comment follows about Policy GD7 - see under that section]</p> <p>The Trust have no further comments to make on the proposed changes to the Plan.</p>
Natural England	<p>Thank you for your consultation on the above dated and received by Natural England on 23 July 2020</p> <p>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.</p> <p>We have reviewed the following documents;</p> <ul style="list-style-type: none"> • Schedule of Revisions to FLP32 (March 2020), <p>[also refers to SA and HRA screening, see under those sections]</p> <p>Natural England has no objection to the proposed schedule of revisions</p>

Respondent	Text of Representations
Historic England	<p>Thank you for consulting Historic England on the above documents dated 23 July 2020. At this stage we have no comments to make on their content.</p> <p>If you have any queries or would like to discuss anything further, please do not hesitate to contact me.</p>
Story Homes	<p>Thank you for providing Story Homes with an opportunity to provide comments on the Partial Review of the Fylde Local Plan (up to 2032) published in March 2020. Set out below are Story Homes' comments on the suggested revisions to the adopted Fylde Local Plan. The process of an early review of a Local Plan, both partial and full, is supported by Story Homes as it ensures there is an alignment between Local and National Planning Policy.</p> <p>On the whole, Story Homes is supportive of the revisions made to the Fylde Local Plan as there is a confidence the Plan now aligns with the most up-to-date National Planning policy. Whilst Fylde Council acknowledge the adopted Local Plan was examined under the 2012 version of the NPPF, there is a degree of comfort in knowing the revisions take account of recent changes to national policy and align with the 2019 version of the Framework.</p> <p>Story Homes is grateful for the opportunity to provide comments to the Partial Review of the Fylde Local Plan (March 2020) and is hopeful that the above comments are found to be constructive and beneficial. We would appreciate being kept informed of the next stage of the consultation and any subsequent planning documents.</p>
Wyre Council	<p>Thank you for consulting Wyre Council on the Partial Review of the Fylde Local Plan to 2032. The following consultation response should also be read alongside our earlier response submitted to the pre-consultation version, dated 6 March 2020.</p>
Turley for Strategic Land Group	<p>We are pleased to write on behalf of our client The Strategic Land Group (SLG), to provide representations to Fylde Council ("the Council") in respect of the Partial Review of the Fylde Local Plan to 2032 (FLP32), which is currently the subject of public consultation.</p> <p>We trust that the comments provided in this letter are of assistance to the Council as it looks to progress the Partial Review of the FLP32, but please do not hesitate to contact either myself or my colleague David Diggle should you have any queries.</p>

Respondent	Text of Representations
Avison Young for National Grid	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Response</p> <p>We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning their networks.</p> <p>Please see attached information outlining further guidance on development close to National Grid assets.</p> <p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p> <p>We would be grateful if you could add our details shown below to your consultation database, if they are not already included:</p> <p style="padding-left: 40px;">[provides details of consultees]</p> <p>If you require any further information in respect of this letter, then please contact us.</p>

Respondent	Text of Representations
Lichfields for Taylor Wimpey	<p>On behalf of Taylor Wimpey UK Limited [Taylor Wimpey], we have prepared the following representations in relation to the Partial Review of the Fylde Local Plan to 2032. Taylor Wimpey welcomes the consultation exercise on the Partial Review and the opportunity to provide comments to Fylde Council [the Council]. Taylor Wimpey has previously made representations in June 2019 on an earlier stage of the Partial Review. These representations focus on the key housing issues which Taylor Wimpey considers that the Council will need to address in order to help ensure that a sound Partial Review will be delivered.</p> <p>These representations are made in relation to Taylor Wimpey’s land interests at Weeton Road, Wesham. The Weeton Road site was promoted for residential development through the now adopted Fylde Local Plan but was not identified as an allocation. Despite this, Taylor Wimpey consider that the site is deliverable and sustainable if required to meet future housing needs.</p> <p>[remainder of content in this section: see individual paragraphs/policies]</p> <p>The above comments are made on a without prejudice basis and Taylor Wimpey reserves the right to make further comments on the Partial Revision at further stages of consultation.</p> <p>We trust that the above representations will be given due consideration in the preparation of the Partial Revision going forward.</p> <p>Please can you confirm receipt of these representations by return.</p>
Homes England	<p>I would firstly like to thank you for the opportunity to comment on the partial review of the Fylde Local Plan.</p> <p>Homes England is the government’s housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we’re making possible the new homes England needs, helping to improve neighbourhoods and grow communities.</p> <p>Homes England does not wish to make any representations on the proposed partial review of the Fylde Local Plan. We will however continue to engage with you as appropriate.</p>
Home Builders’ Federation	<ol style="list-style-type: none"> 1. Thank you for consulting with the Home Builders Federation on the Partial Review of the Fylde Local Plan to 2032. 2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC’s, regional developers and small, local builders. In any one year, our members account for over 80% of all new “for sale” market housing built in England and Wales as well as a large proportion of newly built affordable housing.

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	<p>Future Engagement</p> <p>I trust that the Council will find these comments useful as it continues to progress its Local Plan. Please keep the HBF informed of the next stage of consultation upon this document and any other planning documents. I am happy to discuss further any of the comments made within this representation with the Council prior to the next stage of consultation. Please use the contact details provided below for future correspondence.</p>
<p>Lambert Smith Hampton for AXA</p>	<p>Lambert Smith Hampton act on behalf of AXA one of the largest insurance companies in the world. AXA have a number of landholdings with in Fylde district.</p> <p>Our client wishes to work with the Council in terms of its partial review of the Fylde Local Plan. AXA believe that the partial review of the Fylde Local Plan, to assure that it reflects up to date guidance, is to be welcomed.</p> <p>[main body of representation follows, see under relevant policies and paragraphs]</p> <p>As we have highlighted above AXA would welcome the opportunity of engaging with the Local Planning Authority and local interest groups to discuss issue through which the better strategic planning of the area could be achieved. AXA is willing and able to bring surplus land forward for development. We look forward to the Council’s response and happy to enter discussions. Should you have any questions or require any further information please do not hesitate to contact our Mr Richard Moffat.</p> <p>We would ask that you provide us with notification of the following stages during the review process: -</p> <ul style="list-style-type: none"> • The submission of the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 to the Secretary of State for Communities and Local Government for examination; • Publication of the Planning Inspector's Report on the Partial Review of the Fylde Local Plan to 2032; and/or • Adoption of the Partial Review of the Fylde Local Plan to 2032
<p>Environment Agency</p>	<p>Thank you for consulting us on the above.</p> <p>We have reviewed the details available and, insofar as it relates to our remit, we are satisfied with the proposed revisions. We have no further comments to make.</p>

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Bryning-with-Warton Parish Council	<p>The Parish Council make the following observations.</p> <p style="text-align: center;">[content follows, see under relevant policies and paragraphs]</p> <p>In conclusion it has to be expressed that we can only hope that the colossal task and efforts of all those involved in the collation and composition of this review and revision is not made obsolete by the forthcoming 'Planning for the future' policy paper issued by the Government earlier this year.</p>
Sport England	<p>Thank you for consulting Sport England on the partial review of the Fylde Local Plan to 2032.</p> <p>Sport England's comments reflect the changes proposed as part of the schedule of revisions to FLP32. It is noted that as a general comment, the scope of the Partial Review is narrow in remit and therefore the changes proposed reflect those changes necessary to ensure that the Local Plan remains in accordance with the National Planning Policy Framework 2019.</p> <p>Sport England would be happy and welcome the opportunity to discuss these points should you wish to do so, and I would welcome any conversation with you regarding your sports evidence base.</p>
David Eaves	<p>The Partial review of the Fylde Local Plan TP 2032 is just what it says it should be. Not to be changed as and when a developer needs too. The Council seem to put developers before the community, ie building on a zone 3 flood plain site, example Bambers Lane /School Rd.</p> <p>Is it not time The Secretary of State stopped building on flood plains. It is only the people who buy these properties that suffer NOT the developer. Maybe the council and Secretary of State should listen to the Environment Agency and other experts.</p> <p>Is it not time that money should be spent on the existing infrastructure by developers and Council alike.</p> <p>I have lived in Fylde Borough over 60 years and have no confidence in the Council and especially the Planning department. We have aired our grievances but as usual nothing will happen.</p>
Emery Planning for Wainhomes North West Ltd	<p>1. Introduction</p> <p>1.1 These representations are submitted to the Partial Review of the Fylde Local Plan on behalf of Wainhomes North West.</p>

Respondent	Text of Representations
Gladman Developments	<p>1 INTRODUCTION</p> <p>1.1 Introduction</p> <p>1.1.1 These representations are submitted by Gladman in response to the current Regulation 19 consultation for the Fylde Borough Council Local Plan Partial Review. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.</p> <p>1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to a decent home and employment opportunities.</p> <p>1.1.3 Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation.</p> <p>1.1.4 During the course of this consultation the Government published the Planning for the Future White Paper setting out proposals for how it wants to 'radically reform' the planning system. Central to the proposals will be a simpler, more streamlined Local Plan making process. Consultation on the proposals is currently ongoing and subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.</p> <p>1.1.5 Gladman previously participated in the preparation and Examination of the Fylde Local Plan to 2032. During this process it became apparent that Fylde's neighbour, Wyre Borough Council, would be unable to meet their full housing needs within their authority area, prompting a requirement to fulfil these needs elsewhere within the Fylde Coast Housing Market Area under the Duty to Cooperate.</p> <p>1.1.6 Due to timing, Fylde Borough Council committed to addressing these unmet needs through a full or partial Local Plan review, once the extent of any housing shortfall arising from Wyre had been identified through the authority's own examination process. This issue is therefore a key focus of Fylde's current Partial Review exercise. At the same time, the Council have taken the opportunity to review the current Local Plan to ensure it remains consistent and up to date with the National Planning Policy Framework (February 2019).</p> <p>1.1.7 Through these representations Gladman have raised a number of concerns with the Partial Review process and the changes that the Council are now seeking to make to their current planning policies.</p> <p>1.1.8 In the first instance and a general observation, we question the process by which the Local Plan review has been undertaken. Whilst we accept that the Council's previous Regulation 18 Scoping Consultation provided an opportunity for respondents (including Gladman) to make representations on the remit of the Local Plan Partial Review, the current Regulation 19 consultation is the first occasion that respondents have been able to fully review and comment on the Council's proposals. We have some reservations that the authority are seeking to progress a Partial Review without exploring important issues in the level of detail they deserve. We query whether this an</p>

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	<p>appropriate and transparent way to progress policy proposals that are likely to have significant implications for the future development of the Fylde borough area.</p> <p>1.1.9 We further question the timing of the Local Plan Partial Review in the context of Wyre Borough Council's own Partial Review process, and the wider reforms to the planning system that are currently being considered by the Government. In seeking to advance the Partial Review before Wyre Borough Council have progressed their own proposals to the Regulation 19 stage, there is still no clarity on the issue of unmet housing needs. The Council risks repeating the same situation that led to the requirement to commence the Local Plan Partial Review, and the need to undertake a further review of the Local Plan in the very near future.</p> <p>1.1.10 Gladman also have significant concerns over the proposal to amend the Council's adopted housing requirement. The Government's Standard Method provides the minimum starting point for assessing the Council's local housing need, with evidence provided by the previous Fylde Coast Strategic Housing Market Assessment and subsequent addendums, recent housing completions and the Government's proposed Standard Method amendments highlighting that there are compelling reasons to suggest that the authority should be seeking to plan for a higher housing target. The Council's approach appears to be the antithesis of the national imperative to boost significantly the supply of housing.</p> <p>1.1.11 To prevent the need to revisit the Council's proposals through a further review and in light of the potential requirement to accommodate unmet needs from neighboring authorities, Gladman submit the Council should be looking to identify further sustainable housing sites that could come forward and deliver flexibility in the authority's land supply. These should be in addition to sites that have already been identified for development within the authority's adopted Local Plan, and on the basis that the Council should not be seeking to reduce its adopted housing target.</p> <p>1.1.12 Due to the significant issues that have been raised through these representations, Gladman request the right to appear at any subsequent Examination in Public for the Council's Local Plan Partial Review proposals.</p> <p>NATIONAL PLANNING POLICY</p> <p>2.1 National Planning Policy Framework</p> <p>2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.</p> <p>2.1.2 The Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to</p>

Respondent	Text of Representations
	<p>address the housing, economic, social and environmental priorities to help shape future local communities for future generations. Paragraph 16 of the Framework (2019) states that Plans should:</p> <ul style="list-style-type: none"> a) Be prepared with the objective of contributing to the achievement of sustainable development; b) Be prepared positively, in a way that is aspirational but deliverable; c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). <p>2.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay .</p> <p>2.1.4 At paragraph 60, the Framework sets out that in order to meet this objective, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for</p> <p>2.1.5 To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the Framework (2019).</p> <p>2.2 Planning Practice Guidance</p> <p>2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans, including the methodology for assessing local housing needs using the standard methodology, as set out in the PPG on Housing and Economic Needs Assessment.</p>

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	<p>2.2.2 In this respect, PPG ID: 2a-002 describes how the National Planning Policy Framework expects strategic policy making authorities to follow the standard method for assessing local need as currently prescribed within national planning practice guidance (ID: 2a-004), and that this will identify a minimum annual housing need figure (our emphasis).</p> <p>2.2.3 PPG ID: 2a-010 further outlines that there may be circumstances in which it may be appropriate to plan for a higher level of housing need, where actual housing need is higher than the standard method indicates.</p> <p>2.2.4 In this respect, the PPG sets out how the standard method provides a minimum starting point in determining the number of homes needed in an area, and does not attempt to predict the impact that future Government policies, changing economic circumstances or other factors might have on demographic behaviour. The PPG then lists some examples of the factors that may justify planning for a higher level of housing. These include, but are not limited to:</p> <ul style="list-style-type: none"> • Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth; • Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or • An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; <p>2.2.5 The same section of the PPG also advises that there may occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.</p> <p>2.2.6 It describes how authorities will also need to take these latter factors into account when considering whether it is appropriate to plan for a higher level of need than the standard method suggests.</p> <p>2.3 Planning for the Future White Paper</p> <p>2.3.1 On the 6th August, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.</p> <p>2.3.2 Consultation is currently underway on these proposals and it will be important that the Council keeps up to date with the implementation of these changes and the implications this will in turn have on the preparation of the Local Plan. Timescales remain uncertain, however subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.</p> <p>2.3.3 More importantly alongside this consultation, a consultation is also running on immediate changes to the current planning system. Of significant note is a proposed revised standard method for calculating local housing need, which when implemented will be used as the basis for plans created prior to any changes outlined in the White Paper. Introduction of the revised methodology, which proposes to incorporate a percentage of existing stock as the baseline of the calculation, is likely to see an increase in the housing requirement for Fylde.</p>

Respondent	Text of Representations
	<p>2.3.4 The Council should be mindful of these changes and the potential impact on the Local Plan when progressing its Partial Review proposals.</p> <p>4 LOCAL PLAN PARTIAL REVIEW - PROPOSED CHANGES</p> <p>4.1 Introduction</p> <p>4.1.1 The following section of the representations has been structured to comment on specific changes identified in the Schedule of Revisions to the Fylde Local Plan to 2032. It also comments on other elements of the Council's supporting work where relevant.</p> <p>6 CONCLUSION</p> <p>6.1 Soundness Tests</p> <p>6.1.1 Gladman welcome the opportunity to comment on the Regulation 19 Fylde Local Plan to 2032 Partial Review consultation.</p> <p>6.1.2 For the FLP32 Partial Review to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. These tests are outlined as follows:</p> <ul style="list-style-type: none"> • Positively prepared - provide a strategy which, as a minimum seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified - an appropriate strategy, taking account of the reasonable alternatives based on proportionate evidence; • Effective - deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and • Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework. <p>6.2 Key Conclusions</p> <p>6.2.1 For the reasons stated within these representations, Gladman have a number of important concerns with the revisions to the FLP32 that have been put forward through the current consultation, and question the soundness of authority's proposals:</p> <ul style="list-style-type: none"> • As a general observation, we question the process by which the Local Plan review has been undertaken, with the current Regulation 19 consultation the first occasion that respondents have been able to fully review and comment on the Council's proposals. We query whether this an appropriate and transparent way to progress policy proposals that are likely to have significant implications for the future development of the Fylde borough area. • We question the timing of the Local Plan Partial Review in the context of Wyre Borough Council's own Partial Review process, and the wider reforms to the planning system that are currently being considered by the Government. In seeking to advance the Partial Review before Wyre Borough Council have progressed their own proposals to the Regulation 19 stage, there is no clarity on the

Respondent	Text of Representations
	<p>issue of unmet housing needs. The Council risks repeating the same situation that led to the requirement to commence the FLP32 Partial Revision, and the need to undertake a further review of the Local Plan in the very near future.</p> <ul style="list-style-type: none"> • Gladman have significant concerns over the proposal to amend the Council's adopted housing requirement. The Government's Standard Method provides the minimum starting point for assessing the Council's local housing need, with evidence provided by the previous Fylde Coast Strategic Housing Market Assessment and subsequent addendums, recent housing completions and the Government's proposed Standard Method amendments highlighting that there are compelling reasons to suggest that the authority should be seeking to plan for a higher housing target. The Council's approach appears to be the antithesis of the national imperative to boost significantly the supply of housing. • To prevent the need to revisit the Council's proposals through a further review and in light of the potential requirement to accommodate unmet needs from neighboring authorities, Gladman submit the Council should be looking to identify further sustainable housing sites that could come forward and deliver flexibility in the authority's land supply. These should be in addition to sites that have already been identified for development within the authority's adopted Local Plan, and on the basis that the Council should not be seeking to reduce its adopted housing target. <p>6.2.2 Due to the issues raised in these representations, Gladman request the right to appear at any subsequent Examination in Public hearing sessions to discuss these matters in more detail.</p>
DePol for Concert Living	<p>1. INTRODUCTION</p> <p>1.1 This representation is made for and on behalf of Concert Living to the Partial Review of the Fylde Local Plan to 2032. It objects to the proposed amendments on the basis that the amended policies are unsound due conflict with the National Planning Policy Framework (2019) (hereafter Framework 2019).</p>
Savills for Fylde Coast Care Village Ltd	<p>Written Representation on behalf of Fylde Coast Care Village Limited</p> <p>Lytham Care Village, Lytham Road, Warton</p> <p>Representations on the Partial Review of the Fylde Local Plan to 2032 (FLP32)</p> <p>Introduction</p> <p>Thank you for the opportunity to comment on the Partial Review of the Fylde Local Plan. We provide the following response to the consultation on behalf of our client, Fylde Coast Care Village Limited, in relation to the above site.</p>

Respondent	Text of Representations
	<p>The purpose of this representation is to assist Fylde Council (the Council) in its consideration of its Partial Review of the Local Plan. Silence on other parts of the Plan does not necessarily imply support or objection to those parts of the Plan.</p> <p>Overall, we trust that these representations will be taken into consideration and that the information provided within this letter is of assistance. We would be grateful if you could acknowledge receipt of these representations and keep us informed of any further consultations in relation to the Fylde Local Plan. If you have any queries please feel free to contact either Peter Whittingham or Olivia Pemberton at these offices in the first instance.</p>
Emery Planning for Hollins Strategic Land	1.1 These representations are submitted to the Partial Review of the Fylde Local Plan on behalf of Hollins Strategic Land. Their specific land interest is land at Fleetwood Road, Wesham.
Cassidy & Ashton for Home Farm	<p>We refer to the above and hereby submit brief representations on behalf of Home Farm in respect to objections to the Partial Review.</p> <p>We request the right to appear at any Public Examination at which point we will submit additional statements as appropriate.</p> <p>We also confirm that I would like to be informed of each of the following:</p> <ul style="list-style-type: none"> • The submission of the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 to the Secretary of State for Communities and Local Government for examination; • Publication of the Planning Inspector's Report on the Partial Review of the Fylde Local Plan to 2032; and/or • Adoption of the Partial Review of the Fylde Local Plan to 2032. <p>In respect of our objections to the Partial Review, these are summarised below as follows:</p> <p>As a general comment, we object to the lack of aspiration in the local plan review. The delivery of sustainable housing remains a key element of Government policy and is emphasised through the need to “Build, build, build” to help the economy recover. The local plan review provides an opportunity for Fylde to make a greater contribution to this agenda but has failed to do so. It should be more positively worded in terms of encouraging further, quality development.</p> <p>I would be grateful for an acknowledgement of our representations.</p>

Respondent	Text of Representations
Pegasus Group for Hallam Land Management	<p>1.1 Pegasus Group are instructed by Hallam Land Management Ltd (HLM) to make representations to the Fylde Local Plan Partial Review consultation, which ran between 23rd July and 3rd September.</p> <p>HLM's Land Interests</p> <p>1.2 HLM have held historic interests in two associated land holdings, totalling 31.8 Ha, to the north and west of Warton for many years which have been promoted through a combination of applications and the Local Plan process. The sites are known as Blackfield End Farm, and Clifton House Farm, as shown on the plan below (which is attached at Appendix 1).</p> <p>[see original representation within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>1.3 Blackfield End Farm comprises two parcels of land either side of Church Road, to the north of Warton, and covers a total area of 18.4 Ha. A large proportion of this site, amounting to the 13.2 Ha outside the Green Belt, was the subject of an appeal for residential development of up to 360 dwellings (Ref: APP/M2325/A/14/2217060), which went to Public Inquiry in October 2014 and was approved by the Secretary of State on 24th September 2015. Reserved Matters consent for 331 dwellings was secured in 2018 and is now under construction with Miller Homes developing to the north/east of Church Road, and Stewart Milne Homes to the south/ west.</p> <p>1.4 Clifton House Farm comprises a 13.4 Ha parcel of land to the west of Warton, beyond the existing caravan park and is accessed off Lytham Road. A 3.74 Ha section of this site was the subject of an appeal for up to 115 dwellings (Ref: APP/M2325/W/15/3141398) which went to Public Inquiry in July 2016 and was approved by the Secretary of State on 13th February 2017. HLM subsequently received Reserved Matters consent for 96 dwellings on the site in March 2020 and are in advanced discussions with a housebuilder to bring the site forward.</p> <p>Clifton House Farm Phase 2</p> <p>1.5 Hallam are still in control of the remainder of this land at Clifton House Farm, and are seeking to promote the remaining 5.9 Ha outside the Green Belt it for development through the Local Plan Review. Hereafter this is referred to as 'Clifton House Farm Phase 2' (CHF2), as shown below.</p> <p>[see original representation within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>1.6 The site has capacity to provide 175 - 200 residential dwellings, and represents the next logical location for growth in Warton by rounding off the west of the settlement, with minimal impacts. It also offers potential infrastructure improvements; with the ability to provide a link road across the west of Warton between Lytham Road and Church Road, through the existing committed developments at Clifton House Farm and Blackfield End Farm; with more detail provided in section 3.</p> <p>Representation Structure</p> <p>1.7 The structure of these representations takes the following form:</p> <ul style="list-style-type: none"> • In Section 2 we analyse Warton as a settlement, and its growth in recent years.

Respondent	Text of Representations
	<ul style="list-style-type: none"> • In Section 3 we describe the proposed development at Clifton House Farm, Phase 2. • In Section 4 we raise some procedural issues with the Partial Review in respect of the plan period, consultation stages and the evidence base. • In Section 5 we comment on the housing requirement and proposed changes to Chapters 1, 5 and 9 (including policies DLF1 and H1). • In Section 6 we look at housing supply in more detail, based on our findings from section 5 (which also relate to proposed changes to Chapters 1, 5 and 9, including policies DLF1 and H1). • In Section 7 we address the proposed changes to the other policies (Chapters 7 onwards). • In Section 8 we summarise and conclude our representations. <p>Lack of Defined Consultation Stages</p> <p>4.3 In respect of consultation on this Partial Review we note the Council’s intention to submit this plan for Examination after this consultation along with the representations received. As such this effectively represents the Regulation 19 Submission consultation, with last year’s Scoping consultation comprising the Regulation 18.</p> <p>4.4 Whilst this is loosely referenced within the Statement of Consultation (SDPR07) it is far from clear in the main consultation document (SDPR01) or on the Council’s website and notification emails, with no mention of Regulation 19 anywhere.</p> <p>4.5 It is acknowledged that this comprises a partial review with a narrow scope, however there is no special provision for this within the regulations, namely the ‘Town and Country Planning (Local Planning) (England) Regulations 2012’, nor in the PPG; neither of which distinguish between partial and full Local Plan Reviews.</p> <p>4.6 As such, it is our view that this consultation should have been formally publicised as the Regulation 19 submission stage, and could well have prejudiced those who hadn’t realised that this was the last opportunity to submit representations. On this basis, the Council should consider a further consultation period to ensure a robust consultation process, otherwise the plan could be challengeable.</p> <p>7. UPDATED POLICIES</p> <p>7.1 In this section we comment on the remaining policies, where relevant, that have been updated in line with the 2019 NPPF, to take account of our analysis in section 5 and 6 and the recent White Paper</p>

Respondent	Text of Representations
Sustainability Appraisal and Strategic Environmental Assessment	
Natural England	<p>Thank you for your consultation on the above dated and received by Natural England on 23 July 2020</p> <p>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.</p> <p>We have reviewed the following documents;</p> <ul style="list-style-type: none"> • Schedule of Revisions to FLP32 (March 2020), • Sustainability Appraisal and Strategic Environmental Assessment (Arcadis, March 2020, V2), • Habitats Regulations Assessment Screening Report (Arcadis, March 2020, V02). <p>Natural England has no objection to the proposed schedule of revisions and we concur with the conclusions of the Sustainability Appraisal and Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report.</p> <p>If you have any queries relating to the advice in this letter please contact me on 0208 225 7506.</p>
Gladman Developments	<p>3.3 Sustainability Appraisal</p> <p>3.3.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).</p> <p>3.3.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives.</p> <p>3.3.3 The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision-making and scoring should be robust, justified and transparent.</p> <p>3.3.4 Gladman have reviewed the findings of the Council's Partial Review of the Fylde Local Plan to 2032 Sustainability Appraisal and Strategic Environmental Assessment document. In this respect, we note the contents of paragraph 3.3.2.3 from the SA/SEA report, which states that:</p> <p style="text-align: center;"><i>"Each of the proposed revisions to policies are considered to be necessary for the Plan to be legally sound in light of the latest version of the NPPF, whilst also being necessary to ensure that the Council works effectively with neighbouring authorities. The</i></p>

Respondent	Text of Representations
	<p><i>Council, therefore, considers that any alternative approach to this, such as to not review the Plan and revise policies, or to revise the policies in a different way such that they may not be legally sound or contribute towards effective co-operation with neighbouring authorities, would not be a reasonable approach. As such, there are no reasonable alternatives to the proposed revisions to policies and so no reasonable alternatives have been appraised in this SA Report."</i></p> <p>3.3.5 Whilst Gladman recognise that it is not always necessary to test all possible alternative approaches, instead focusing on those that considered to be 'reasonable alternatives', we question the basis on which the above conclusions have been reached.</p> <p>3.3.6 In particular, we submit that it would have been a reasonable alternative to consider an increased level of housing provision as part of the SA/SEA process. For the reasons that are explored further in Section 4 of our representations below, we submit that an increased housing target and the identification of additional housing allocations would conform with the requirements of national planning policy and guidance, be legally sound and would assist neighbouring authorities in meeting their potential unmet housing needs under the Duty to Cooperate.</p> <p>3.3.7 For these reasons, we consider that it would have been appropriate and consistent with the legal requirements of the Planning and Compulsory Purchase Act 2004 and SEA Regulations to consider this as a reasonable alternative through the authority's SA/SEA work.</p>
Habitats Regulations Assessment Screening Report	
Natural England	<p>Thank you for your consultation on the above dated and received by Natural England on 23 July 2020</p> <p>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.</p> <p>We have reviewed the following documents;</p> <ul style="list-style-type: none"> • Schedule of Revisions to FLP32 (March 2020), • Sustainability Appraisal and Strategic Environmental Assessment (Arcadis, March 2020, V2), • Habitats Regulations Assessment Screening Report (Arcadis, March 2020, V02). <p>Natural England has no objection to the proposed schedule of revisions and we concur with the conclusions of the Sustainability Appraisal and Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report.</p> <p>If you have any queries relating to the advice in this letter please contact me on 0208 225 7506</p>

Respondent	Text of Representations
Economic Viability Assessment Review 2020	
	No representations received in relation to this section
Draft Statement of Common Ground	
Wyre Council	Wyre Council have been able to respond on a number of matters through Duty to Cooperate (DtC), in addition to emails exchanges and phone conversations between members of your team and my own. This cooperation has been positive, ongoing and constructive and has resulted in some changes to the documents concerned; particularly the Statement of Common Ground (SoCG).
Emery Planning for Wainhomes North West	<p>2. Duty to Cooperate</p> <p>2.16 Paragraph 26 of the Framework states that:</p> <p><i>“Effective and ongoing joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.”</i></p> <p>2.17 As noted in the ‘Reason 1’ section above, the Schedule of Revisions states that the Partial Review of the Fylde Local Plan has not needed to incorporate alterations to its housing needs or requirement figures following consideration of the issue of housing need in Wyre.</p> <p>2.18 However, Wyre Council sent a letter to Fylde Council regarding the Partial Review and the Duty to Cooperate, dated 6 March 2020 (Appendix EP1), which does not support Fylde’s assessment of its housing need as a standalone issue. This letter states that matters of housing need would most comprehensively be dealt with jointly between the respective authorities, and it is the view of Wyre Council that the authorities should work together to identify where unmet housing need should be accommodated. Wyre Council’s letter states that the plan processes of the two councils need to be properly aligned in order to accommodate this. The letter states:</p> <p><i>“I would therefore like to propose that we agree to jointly review the above matters to further inform the partial review of both our plans, providing the opportunity to achieve a consistency of approach between our two authorities and their plans. In my view this is the best way to review our respective plans for our shared housing market area, and to ensure that housing needs are properly planned for and met across the HMA.”</i></p> <p>2.19 In order for the Plan Review to produce an effective and long-term housing strategy, and ensure that housing needs of the HMA are met in full, Fylde Council should undertake a joint plan review with Wyre Council. It is not sufficient for Fylde Council to undertake a</p>

Respondent	Text of Representations
	<p>standalone review of its housing requirement without a comprehensive study of the housing needs of the wider HMA. This should also include Blackpool Council who form the other LPA in the Housing Market Area.</p> <p>2.20 In addition, the consequences of Fylde going along by applying LHN when the other authorities are applying their adopted figure for the housing market area has not been explained or justified.</p> <p>2.21 In proceeding with the Partial Review despite the written request of Wyre Council to align their respective plan-making timescales and undertake a cross-boundary assessment of housing need, Fylde Council has not complied with the Duty to Cooperate.</p>
Gladman Developments	<p>3 LEGAL REQUIREMENTS</p> <p>3.1 Duty to Cooperate</p> <p>3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.</p> <p>3.1.2 The Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist.</p> <p>3.1.3 The Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process . The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.</p> <p>3.1.4 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St Albans examinations, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.</p> <p>3.2 Duty to Cooperate - Fylde Coast</p> <p>3.2.1 As described in the Introduction to these submission and discussed further below, a key driver for progressing a Partial Review of the Fylde Local Plan to 2032 (FLP32) was to assess any unmet housing needs arising in the Fylde Coast Housing Market Area (HMA), and specifically those from Wyre Borough Council.</p>

Respondent	Text of Representations
	<p>3.2.2 During the course of the FLP32 Examination in Public (EIP), it became clear that Wyre Borough Council would be unable to meet their full objectively assessed housing needs within their own authority area. A main modification was therefore proposed that would commit the Council to undertaking a full or Partial Review of the FLP32 (FLP32 paragraph 1.27) to examine the issue of any shortfall, once this had been correctly quantified through the Wyre Local Plan Examination process.</p> <p>3.2.3 It has since been identified that the level of unmet needs arising from Wyre would equate to 380 dwellings per year based on the findings of the Fylde Coast Strategic Housing Market Assessment (SHMA), thus prompting a Partial Review of the FLP32. At the same time, Wyre Borough Council have commenced a Partial Review of their own Local Plan with the objective of meeting their housing needs in full, as required by Wyre Local Plan Policy LPR1.</p> <p>3.2.4 Whilst Gladman welcome the willingness to address the issue of unmet housing needs through the Council's respective Partial Review processes, we have significant concerns about how this matter is being dealt with in practice.</p> <p>3.2.5 Firstly, we question whether it is appropriate to undertake a Partial Review of the Fylde Local Plan before any unmet needs arising from Wyre's concurrent review exercise have been correctly identified. Progressing with the FLP32 Partial Review before Wyre have fully examined any shortfall that could arise within their own authority area risks leading to the same situation that arose during the preparation and examination of the authorities' current Local Plans, and pre-empting decisions on how best to meet any housing shortfall.</p> <p>3.2.6 The Council have sought to explore this issue in Section 3 of their March 2020 Housing Needs and Requirement Background Paper, making the assumption in Table 3 that Wyre Borough Council will be planning for a local housing need figure of 308 dpa through their own Partial Review exercise, and that as this figure is lower than the authority's adopted housing target of 460 dpa, there will be no unmet need that must be accommodated in the Fylde Borough area.</p> <p>3.2.7 However, this assumption is made on the basis that Wyre will be planning for a housing target that aligns with their current local housing need figure, which is yet to be clarified or confirmed. Although the Council have indicated a willingness to accommodate any unmet needs arising from Wyre within the Fylde borough area, this appears to be on the assumption that that it will be appropriate to reduce the Council's own housing target, and any need can be met through existing Local Plan allocations . For the reasons explained further in Section 4 below, we object to this proposal.</p> <p>3.2.8 With the above in mind, we question whether it is currently the correct time to proceed with the Fylde Local Plan Partial Review, given the significant uncertainties that are potentially at play. A key reason for commencing the Local Plan Partial Review process was to address the issue of unmet housing needs, yet it still appears that there is no clarity on this important matter.</p> <p>3.2.9 Should the Council advance the Partial Review with a reduced housing requirement, before Wyre and other adjoining authorities have advanced their own Local Plan review exercises, there also is a risk that these Councils will need to assess their own housing requirements and those of Fylde in light of the Government's revised Standard Method. The proposed revisions to the Standard Method would result in a need to plan for 488 dwellings per annum in the Fylde borough area.</p>

Respondent	Text of Representations
	<p>3.2.10 The timescales for progressing the Wyre Local Plan Partial Review currently envisage submission to the Secretary of State by early 2022, by which time the proposed changes to the Standard Method are likely to have come into effect. This could lead to further inconsistencies when planning for the supply and delivery of homes across the Fylde Coast area, should the Fylde Local Plan Partial Review proceed as currently proposed.</p> <p>3.2.11 To avoid these potential complications and the need to undertake a further review of the Fylde Local Plan in the very near future, we submit that the Council should now be looking to allocate additional housing sites, over and above those identified in the current FLP32, and on the basis of no reduction in the Council's own housing target. This will ensure that the Local Plan can respond to any unmet housing needs arising from neighbouring authority areas and future changes in Fylde's own housing requirements associated with the revised Standard Method, and provide greater flexibility in the authority's housing land supply.</p> <p>4.2 Duty to Cooperate (Paragraphs 1.26 and 1.27)</p> <p>4.2.1 As identified in Section 3 above, Gladman have significant concerns over the lack of clarity regarding the issue of unmet needs from Wyre Borough Council, and how these will be addressed through the FLP32 Partial Review.</p> <p>4.2.2 This is highlighted through the proposed changes to FLP32 paragraphs 1.26 and 1.27, which state that "Whether the unmet need of 380 dwellings from the Wyre Local Plan (2011-2031) cannot be met in Wyre is a matter for the Partial Review of the Wyre Local Plan's reassessment of housing need in Wyre and how it is to be met", supported by the assumption that when based on the current Standard Method a) Wyre will be able to meet its housing needs in full, and b) any potential unmet need arising from Wyre could be accommodated in Fylde's revised housing target of 275 - 415 dpa.</p> <p>4.2.3 However, there is currently no clarity on this matter, or what the potential level of unmet need from arising from Wyre will be. This will only be confirmed once the Council's own Partial Review proposals are more advanced. Furthermore, the assumption that any unmet could be accommodated within the Fylde's revised housing requirement of 275 - 415 dpa is dependent on this figure being found sound. For the reasons given below, we have significant concerns over this proposal.</p> <p>4.2.5 To ensure that the Local Plan is able to respond to any housing shortfalls arising from adjoining authorities and can accommodate future increases in Fylde's own housing needs, we believe that the Council should now be looking to allocate additional housing sites, over and above those identified in the authority's adopted proposals. This should be on the basis of no reduction in the Council's own housing target, and will help to provide greater flexibility in the authority's housing land supply.</p>
Emery Planning for Hollins Strategic Land	<p>2. Duty to Cooperate</p> <p>2.16 Paragraph 26 of the Framework states that:</p>

Respondent	Text of Representations
	<p><i>“Effective and ongoing joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.”</i></p> <p>2.17 As noted in the ‘Reason 1’ section above, the Schedule of Revisions states that the Partial Review of the Fylde Local Plan has not needed to incorporate alterations to its housing needs or requirement figures following consideration of the issue of housing need in Wyre.</p> <p>2.18 However, Wyre Council sent a letter to Fylde Council regarding the Partial Review and the Duty to Cooperate, dated 6 March 2020 (Appendix EP1), which does not support Fylde’s assessment of its housing need as a standalone issue. This letter states that matters of housing need would most comprehensively be dealt with jointly between the respective authorities, and it is the view of Wyre Council that the authorities should work together to identify where unmet housing need should be accommodated. Wyre Council’s letter states that the plan processes of the two councils need to be properly aligned in order to accommodate this. The letter states:</p> <p><i>“I would therefore like to propose that we agree to jointly review the above matters to further inform the partial review of both our plans, providing the opportunity to achieve a consistency of approach between our two authorities and their plans. In my view this is the best way to review our respective plans for our shared housing market area, and to ensure that housing needs are properly planned for and met across the HMA.”</i></p> <p>2.19 In order for the Plan Review to produce an effective and long-term housing strategy, and ensure that housing needs of the HMA are met in full, Fylde Council should undertake a joint plan review with Wyre Council. It is not sufficient for Fylde Council to undertake a standalone review of its housing requirement without a comprehensive study of the housing needs of the wider HMA. This should also include Blackpool Council who form the other LPA in the Housing Market Area.</p> <p>2.20 In proceeding with the Partial Review despite the written request of Wyre Council to align their respective plan-making timescales and undertake a cross-boundary assessment of housing need, Fylde Council has not complied with the Duty to Cooperate.</p>
Pegasus Group for Hallam Land Management	<p>Duty to Cooperate</p> <p>4.7 I note the submission documents include a Draft Statement of Common Ground (SDPR05), dated March 2020, between Fylde, Wyre, Blackpool and Lancashire County Council to deal with strategic cross-boundary matters.</p> <p>4.8 Whilst we welcome this engagement across the Fylde Coast sub region, which has been confirmed as a joint housing market area (HMA) in the most recent SHMA (2014), and has also had issues with unmet need (which has driven the need for this review); we would question the status of this draft given that it doesn’t appear to have been signed by anyone, so it is unclear what level of buy-in it has had from the other authorities, and this is important in the context of our comments in section 5.</p>

Respondent	Text of Representations
Health Impact Assessment Screening	
	No representations received in relation to this section
Schedule of Evidence	
Sport England	<p>Evidence Base</p> <p>Several comments are made throughout the schedule of revisions to the evidence base underpinning the Local Plan, particularly with reference to the importance of taking a strategic approach to sport and recreation. The Playing Pitch Strategy and the Built Facility Strategy are therefore key documents to inform policy decisions relating to Policies HW3 and ENV3.</p> <p>The schedule of evidence/ updates suggest that the PPS does not need updating as it doesn't relate to the policy changes being suggested and therefore does not fall within the remit of this partial review. Whilst this is the case, it is noted that the date of the most recent Playing Pitch Strategy is April 2016. Consultation was undertaken with the council, Sport England and the NGB's to inform the assessment, strategy and action plan and therefore the data that informed the PPS dates back to 2015. As a guide, if no review and subsequent update has been carried out within 3 years of the PPS being signed off by the steering group, then Sport England and the NGBs would consider the PPS and the information on which it is based to be out of date. The nature of the supply and demand for pitches is likely to have changed over the three years therefore, without any form of review and update within this time period it would be difficult to make the case that the supply and demand information and assessment work is sufficiently robust. Furthermore, if the policy is used for determining planning applications, developers are likely to challenge the evidence base especially in the context of the need to protect existing facilities or provide for sport in new development through planning obligations or CIL.</p> <p>To address these concerns, it is advised that the Council undertakes a review of its existing sports evidence base in order to ensure that there is a robust evidence to support the existing local plan policies that have community sports facility implications. In Sport England's view, this approach would be justified to ensure the local plan is consistent with paragraph 96 of the NPPF.</p> <p>As well as meeting the needs of the local plan, the preparation of such strategies may also assist with delivering wider Council objectives e.g. assisting with the health and well-being agenda, reviewing the future of Council owned assets, sports development, influencing investment on school sites, external funding bids etc. A robust evidence base for sport will also be needed to support the identification of strategic priority projects in the Council's Infrastructure Delivery Plan.</p>

Respondent	Text of Representations
Paragraph 1.3: 2019 Framework	
	No representations received in relation to this section
Paragraph 1.4: Introduction to the Partial Review	
Turley for Strategic Land Group	The FLP32 was adopted in October 2018 following independent examination. The Inspector’s Report (IR) concluded that the FLP32 was sound subject to modifications, including a commitment to undertake an early full or partial review to consider and address any unmet need within the housing market area, i.e. within the adjoining boroughs of Blackpool and Wyre (paragraph 1.27). The Partial Review also sets out that the review is being undertaken to ensure that the FLP32 accords with the requirements of the current National Planning Policy Framework (NPPF), which was published in 2019 after the adoption of the FLP32.
Lichfields for Taylor Wimpey	<p>Background</p> <p>The Framework [§59] is clear that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The preparation of a Local Plan Review in accordance with the commitment at §1.27 of the adopted Local Plan should not be seen as a mechanism to reduce the overall housing requirement for the Council over the plan period and contradict the Government’s commitment to boost the supply of housing nationally.</p> <p>At the outset of the Schedule of Revision to the FLP 2032 document, it sets out that the Fylde Local Plan was prepared and examined following the guidance set out in the Framework, published in March 2012 and the relevant PPG. The Partial Review of the Local Plan has been undertaken to address two matters:</p> <ul style="list-style-type: none"> • §212 of the Framework states that Plans may need to be revised to reflect policy changes which the replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision of by preparing a new Plan. This Partial Review of the Fylde Local Plan to 2032 incorporates revisions to ensure the Local Plan has regard to the revised Framework of February 2019. • §1.27 of the Local Plan commits the Council to undertake an early review of the Plan (whether partial or full) to examine the issue of unmet need in Wyre, if Wyre’s Local Plan is adopted with unmet need. The Wyre Local Plan (2011-2031) was adopted on 28th February 2019 with a shortfall of housing provision against the housing need figure identified in the plan. This Partial Review of the Fylde Local Plan to 2032 incorporates revisions to provide explanation of the updated position in order to address the issue, and is accompanied by a supporting statement of common ground.

Respondent	Text of Representations
Lambert Smith Hampton for AXA	<p>Paragraph 33 of the National Planning Policy Framework states: -</p> <p><i>Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future</i></p> <p>In setting out the comments below we have had regard to the advice set out in paragraph 33 and the general direction of travel for planning policies in emerging Government guidance</p>
Bryning-with-Warton Parish Council	<p>It is of course appreciated that the revision to the 'FLP to 32' comes from the need to conform to newer wordings expressed in 'NPPF19' while much will be clarification of intent rather than material change. It cannot go unrecorded however that there is extreme concerns to the local Community that the introduction leads with the following given the impact and extent of more recent housing developments and application within the Parish.</p>
Sport England	<p>Sport England have no comments in relation to the reference changes to the NPPF (2019) as suggested throughout the document and agree with the references made to paragraph 96 and 97.</p>
Emery Planning for Wainhomes North West Ltd	<p>1.2 Fylde Council is undertaking a Partial Review of the Fylde Local Plan (adopted 22 October 2018), which is subject to consultation until 3rd September 2020. The Schedule of Revisions consultation document, published 23 July 2020, states that this Partial Review is being undertaken on the basis that:</p> <ol style="list-style-type: none"> 1. The Local Plan was examined in accordance with the National Planning Policy Framework 2012, which was subsequently revised in July 2018 and February 2019, and revisions are required to ensure conformity with the updated Framework. 2. The Local Plan was adopted with the commitment that an early review would be undertaken due to Wyre Council's difficulties in meeting its objectively assessed need for housing. <p>1.3 For the reasons we set out in this statement, neither of these two reasons justify the Partial Review as drafted and it should therefore be withdrawn.</p> <p>1.4 We address each in turn.</p>

Respondent	Text of Representations
	<p>[see content under relevant policies/paragraphs]</p> <p>5. Summary</p> <p>5.1 The Fylde Local Plan Partial Review is being undertaken on the basis that revisions are required to ensure conformity with the Framework (2019) and to examine Wyre Council's issues in meeting its housing need to ensure that the needs of the wider HMA are met.</p> <p>5.2 However, neither of these justifications would be satisfied by the Partial Review. As demonstrated above, the revision of the housing requirement is in conflict with the Framework and would negatively impact the aim to ensure that the needs of the HMA are met.</p> <p>5.3 There is no justification in the Framework or the PPG for an early plan review based on the adopted housing requirement (415 dwellings) being higher than the requirement generated by the standard method (275 dwellings), which is the case in Fylde. As such, the revised housing requirement proposed by the Partial Review is not in accordance with national planning policy or guidance.</p> <p>5.4 Further, it is considered that in proceeding with the Partial Review despite the written request of Wyre Council to align their respective plan-making timescales and undertake a cross-boundary assessment of housing need, Fylde Council has not complied with the Duty to Cooperate.</p> <p>5.5 Finally, we consider that it is premature for Fylde Council to seek to revise its housing requirement at this stage given the proposed revisions to the standard method and the resulting implications for Fylde's housing need. It is also necessary to engage the plan making process with Blackpool Council.</p> <p>5.6 Based on the above considerations, the Partial Review of the Fylde Local Plan should not progress. The only justification for the Partial Review is if in accordance with Paragraph ID: 61-062- 20190315 of the PPG where if the number generated using the standard method (488 dwellings) on the basis the draft method is adopted, it would be higher than the adopted requirement in Policy H1 (415 dwellings). Until then Policy H1 should remain as the requirement in the adopted development plan.</p>
Savills for Fylde Coast Care Village Ltd	<p>Representations</p> <p>The consultation on the Partial Review of the Fylde Local Plan to 2032 (PRFLP32) relates to the proposed revisions to the Local Plan to deal with two principal issues:</p> <ul style="list-style-type: none"> • The need to ensure that the Local Plan remains in accordance with national planning policy, following the publication of the new National Planning Policy Framework in February 2019; • The need to examine the issue of unmet housing need in Wyre, in line with the commitment in paragraph 1.27 of the Local Plan, and following the adoption in February 2019 of the Wyre Local Plan (2011-2031) with unmet housing need.

Respondent	Text of Representations
	<p>It is widely accepted that there is a chronic shortage of housing in the UK. The revised NPPF seeks to address the housing crisis, focusing policies on increasing housing provision in all areas. The NPPF has a strong emphasis on the need to significantly boost the supply of housing across the UK.</p>
<p>Emery Planning for Hollins Strategic Land</p>	<p>1.2 Fylde Council is undertaking a Partial Review of the Fylde Local Plan (adopted 22 October 2018), which is subject to consultation until 3rd September 2020. The Schedule of Revisions consultation document, published 23 July 2020, states that this Partial Review is being undertaken on the basis that:</p> <ol style="list-style-type: none"> 1. The Local Plan was examined in accordance with the National Planning Policy Framework 2012, which was subsequently revised in July 2018 and February 2019, and revisions are required to ensure conformity with the updated Framework. 2. The Local Plan was adopted with the commitment that an early review would be undertaken due to Wyre Council's difficulties in meeting its objectively assessed need for housing. <p>1.3 For the reasons we set out in this statement, neither of these two reasons justify the Partial Review as drafted and it should therefore be withdrawn.</p> <p>1.4 We address each in turn.</p> <p>[see content under relevant policies/paragraphs]</p> <p>5. Summary</p> <p>5.1 The Fylde Local Plan Partial Review is being undertaken on the basis that revisions are required to ensure conformity with the Framework (2019) and to examine Wyre Council's issues in meeting its housing need to ensure that the needs of the wider HMA are met.</p> <p>5.2 However, neither of these justifications would be satisfied by the Partial Review. As demonstrated above, the revision of the housing requirement is in conflict with the Framework and would negatively impact the aim to ensure that the needs of the HMA are met.</p> <p>5.3 There is no justification in the Framework or the PPG for an early plan review based on the adopted housing requirement (415 dwellings) being higher than the requirement generated by the standard method (275 dwellings), which is the case in Fylde. As such, the revised housing requirement proposed by the Partial Review is not in accordance with national planning policy or guidance.</p> <p>5.4 Further, it is considered that in proceeding with the Partial Review despite the written request of Wyre Council to align their respective plan-making timescales and undertake a cross-boundary assessment of housing need, Fylde Council has not complied with the Duty to Cooperate.</p>

Respondent	Text of Representations
	<p>5.5 Finally, we consider that it is premature for Fylde Council to seek to revise its housing requirement at this stage given the proposed revisions to the standard method and the resulting implications for Fylde’s housing need. It is also necessary to engage the plan making process with Blackpool Council.</p> <p>5.6 Based on the above considerations, the Partial Review of the Fylde Local Plan should not progress. The only justification for the Partial Review is if in accordance with Paragraph ID: 61-062-20190315 of the PPG where if the number generated using the standard method (488 dwellings) on the basis the draft method is adopted, it would be higher than the adopted requirement in Policy H1 (415 dwellings). Until then Policy H1 should remain as the requirement in the adopted development plan.</p>
Pegasus Group for Hallam Land Management Ltd	<p>Planning for the Future White Paper – August 2020</p> <p>4.9 Since this consultation began, the government have published the ‘Planning for the Future White Paper’ (August 2020) and supporting ‘Changes to the current planning system’ document for consultation until October 2020.</p> <p>4.10 The White Paper proposes a number of significant changes to the Local Plan making process, including changes to the standard methodology, which generate massively increased housing requirements in England when compared to the current calculations, and the introduction of a zoning system which introduces three types of land; ‘growth areas’ suitable for substantial development (with automatic outline consent for types of development specified in the Plan), ‘renewal areas’ suitable for some development, and ‘protected areas’ where development is restricted; and we provide further comment on these matters in sections 5 - 7.</p> <p>4.11 Whilst only draft at this stage (and subject to any amendments resulting from the current consultation), the changes could be introduced through a Written Ministerial Statement in Autumn this year⁴, and therefore could well have a significant bearing on any emerging plan including the Fylde Partial Review.</p> <p>4.12 In respect of timeframes and transitional arrangements, page 41 of the White Paper proposes a statutory duty for Councils to have a new Local Plan in place within 30 months (2.5 years) of the legislation coming in, i.e. by mid-2023; or 42 months if their current plan was adopted within the last 3 years (as Fylde’s is), i.e. by mid-2024.</p> <p>4.13 In light of this, it would seem prudent for Fylde to take account of the proposed changes now and begin a more formal Review, as even if they were to adopt this partial review by early 2021, it would unlikely to stay in place for 5 years as it would require updating under the new system by mid-2024 as set out above; and given the significance of the changes proposed local authorities should be giving themselves as much lead-in time as possible to get a new style plan in place.</p>

Respondent	Text of Representations
Paragraph 1.5: Sustainable Development	
	No representations received in relation to this section
Paragraph 1.9: Neighbourhood Development Plans	
	No representations received in relation to this section
Paragraph 1.15: Duty to Co-Operate	
	No representations received in relation to this section
Paragraph 1.16: Statements of Common Ground	
	No representations received in relation to this section
Paragraph 1.18 Strategic Priorities	
	No representations received in relation to this section
Paragraph 1.24: Review Mechanism if Unmet Need, also box setting out previous text	
Bryning-with-Warton Parish Council	<i>'Additionally, Paragraph 1.27 of the Local Plan states that "Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively- assessed need for housing. Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed. Fylde Council will undertake an early review of the Plan (whether partial or full) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met</i>

Respondent	Text of Representations
	<p><i>within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development". Accordingly, the Partial Review of the Local Plan is defined by the changes between NPPF12 and NPPF19, as well as the Duty to Cooperate.</i></p> <p>Obviously included in Chapter 1.24 SDPR01 : Schedule of Revisions to the FLP32;</p> <p>Councillors would naturally conclude that each and every City, Town and Parish will be struggling to meet the assessed need of housing in their communities and to place this burden on neighbouring council's is incredulous to say the least. Fylde Council should not be placed in this unenviable position and Wyre Council should be addressing their shortfall with the Government.</p>
Emery Planning for Wainhomes North West Ltd	<p>3. Reason 2 – Meeting Wyre’s Unmet Needs</p> <p>3.1 The adopted Fylde Local Plan sets out that Wyre Council wrote to Fylde Council in May 2016, under the Duty to Cooperate, to request that Fylde Council assist Wyre Council in meeting its objectively assessed housing need. The Objectively Assessed Need (OAN) figures for the three Fylde Coast Authorities originate from the ranges set out in the original SHMA 2014 and its updates which considered revised population and household formation data.</p> <p>3.2 The adopted Fylde Local Plan states that Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively assessed need for housing. The Plan states that any need that remains unmet following the adoption of Wyre’s Local Plan will need to be addressed. As such, Fylde Council committed to undertake an early review of its Local Plan to examine this issue, working with other authorities adjoining Wyre under the Duty to Cooperate. The Fylde Local Plan states that:</p> <p><i>“The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development.”</i></p>
Emery Planning for Hollins Strategic Land	<p>3. Reason 2 – Meeting Wyre’s Unmet Needs</p> <p>3.1 The adopted Fylde Local Plan sets out that Wyre Council wrote to Fylde Council in May 2016, under the Duty to Cooperate, to request that Fylde Council assist Wyre Council in meeting its objectively assessed housing need. The Objectively Assessed Need (OAN) figures for the three Fylde Coast Authorities originate from the ranges set out in the original SHMA 2014 and its updates which considered revised population and household formation data.</p> <p>3.2 The adopted Fylde Local Plan states that Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively assessed need for housing. The Plan states that any need that remains unmet following the adoption of Wyre’s Local Plan will need to be addressed. As such, Fylde Council committed to undertake an early review of its Local Plan to examine this issue, working with other authorities adjoining Wyre under the Duty to Cooperate. The Fylde Local Plan states that:</p>

Respondent	Text of Representations
	<p><i>“The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development.”</i></p>
<p>Paragraph 1.25: Wyre Local Plan adopted with shortfall</p>	
<p>Wyre Council</p>	<p>The Wyre Local Plan 2011 – 2031 (WLP31) contains Policy LPR1, the contents of which are incontestable common ground and the confirmation of un-met housing need within Wyre, is again incontestable common ground. This un-met need provides (in part) the justification for the review of the Fylde Local Plan to 2032 and a strong link between our two plans and their subsequent review.</p>
<p>Emery Planning for Wainhomes North West Ltd</p>	<p>3.3 The Wyre Local Plan was adopted on 28 February 2019 and identifies the OAN for Wyre to be 479 dwellings per annum, equating to 9,580 over the plan period to 2031. Policy SP1 of the Plan states that it will deliver a minimum of 9,200 dwellings, which equates to 460 dwellings per annum. This results in a shortfall of 380 dwellings. The adoption of the Wyre Local Plan with this shortfall triggers the early review mechanism contained within paragraph 1.27 of the adopted Fylde Local Plan.</p>
<p>Emery Planning for Hollins Strategic Land</p>	<p>3.3 The Wyre Local Plan was adopted on 28 February 2019 and identifies the OAN for Wyre to be 479 dwellings per annum, equating to 9,580 over the plan period to 2031. Policy SP1 of the Plan states that it will deliver a minimum of 9,200 dwellings, which equates to 460 dwellings per annum. This results in a shortfall of 380 dwellings. The adoption of the Wyre Local Plan with this shortfall triggers the early review mechanism contained within paragraph 1.27 of the adopted Fylde Local Plan.</p>
<p>Pegasus Group for Hallam Land Management Ltd</p>	<p>5. HOUSING REQUIREMENT & DEVELOPMENT STRATEGY</p> <p>5.1 The Fylde Partial Review has a very narrow scope, as set out in paragraph 1.27 of the adopted plan, and confirmed in last year’s Regulation 18 scoping consultation, to deal with potential unmet need in Wyre, which was thought to be 380 dwellings at the time of adoption. Wyre made the case in their adopted plan that they were unable to meet their needs in full due to environmental and highways constraints.</p> <p>5.2 Wyre undertook a similar scoping consultation for their Partial Review in February 2020 on the same narrow basis, but have yet to follow this with any further consultation or assessment.</p>

Respondent	Text of Representations
Paragraph 1.26: Wyre's requirement for Partial Review through Wyre Local Plan Policy LPR1	
Story Homes	<p>Story Homes is, however, concerned about the assumptions made by Fylde Council with regard to Wyre Council meeting their own shortfall. It is considered that additional robust evidence is required to ensure this shortfall will be met within Wyre.</p>
Wyre Council	<p>Policy LRP1 sets out the steps that need to be undertaken as part of Wyre's Local Plan review in order to ascertain what proportion (if any) of the unmet need can be accommodated in Wyre. As set out above, Fylde's Local Plan review is justified in part by a commitment by Fylde to assisting Wyre meet its residual unmet need.</p> <p>For the avoidance of doubt the full OAN for housing in Wyre is 479 dpa, with the WLP31 providing only 460 dpa; thus establishing the unmet housing need as a matter of recently adopted policy. The housing requirement for Wyre can only be changed through the adoption of a reviewed local plan or through an entirely new local plan. Although the Government has introduced a Standard Method (SM) for the calculation of housing need, this is a starting point and it cannot be assumed that this will represent the final position for Wyre.</p> <p>I also wish to draw your attention to the fact that it cannot be assumed that Wyre Council, through the partial review process, will be able to meet its housing needs in full within the Borough. The Inspector's Report into Wyre's Local Plan made it clear that further consideration needed to be given as to the extent to which any unmet need could be met in Wyre through a review of transport and highway issues. This is reflected in LRP1 (2). Until detailed consideration has been given to this issue through the review process, it has not been established that Wyre can meet any unmet needs within the Borough.</p> <p>Finally, I note from the governments recently published 'Planning for the Future' white paper that a number of fundamental planning reforms are proposed which may have consequences for the local plan process. This may have implications for how both authorities proceed with their respective local plan partial reviews.</p>
Turley for Strategic Land Group	<p>The FLP32 sets out that a key change introduced by the revised NPPF is that local housing needs should be based on starting point calculated according to a "standard method" (SM). The SM calculates a minimum housing need figure of:</p> <p style="padding-left: 40px;">[considers the figure for Fylde: see under paragraph 9.13]</p> <ul style="list-style-type: none"> • 308 dpa for Wyre. This is 152 dpa less than the adopted housing requirement in the Wyre Local Plan (2011-2031) of 460 dpa. <p>The Partial Review notes that the SM housing need figure for Wyre means that, in effect, there is no unmet need arising in Wyre. As such, the Partial Review does not propose any increase in the housing requirement to accommodate any shortfall from Wyre.</p> <p style="padding-left: 40px;">[continues in relation to the Fylde requirement: see under Policy H1]</p>

Respondent	Text of Representations
	<p>SLG's comments in this respect are as follows:</p> <p>Unmet housing need in the HMA</p> <p>The evidence published alongside the Partial Review sets out that there is no unmet housing need in Wyre on the basis that the SM figure for the Borough is lower than the adopted requirement in the Wyre Local Plan. However, as with the situation in Fylde, the adoption of the SM figure as a housing requirement for Wyre would be incompatible with that Borough's growth plans, such that the adopted requirement figure for Wyre remains sound.</p> <p>It is therefore misleading and inaccurate to now state that there is no unmet need within Wyre. SLG considers that the unmet need previously identified remains relevant and should be accommodated in Fylde, unless Wyre's own review can accommodate it first.</p> <p>This is particularly the case in the context of the Government's proposed revision to the SM4. This revision would increase the cumulative baseline SM figure for the housing market area (Blackpool, Fylde and Wyre) from 689 dpa to 1,173 dpa, including a figure of 488 dpa in Fylde itself (higher than the 415 dpa requirement in the FLP32). It is acknowledged that limited weight can be placed on the proposed revision to the SM given that it remains in draft form and is subject to consultation. However, it nevertheless provides further indication that the various authorities within the HMA are underestimating their future housing needs.</p>
Lichfields for Taylor Wimpey	<p>As set out earlier, this Partial Review of the Fylde Local Plan was necessitated by a commitment made through the Examination of the Plan to meet any outstanding needs of Wyre following the adoption of their Local Plan. Because Fylde and Wyre progressed plans at different times, despite relying on shared evidence and a Memorandum of Understanding, the result was a need for the early review commitment to be embedded in the Fylde Local Plan.</p> <p>Wyre's Local Plan was adopted in February 2019 with an adopted housing requirement of 479 dwellings per annum. It was determined through the Examination of the Wyre Local Plan that the Plan would deliver a minimum of 9,200 dwellings, which equates to 460 dpa, resulting in a shortfall of 380 dwellings or 4% of the OAN. Wyre Council has commenced its consultation on the scope of the Partial Review of the Wyre Local Plan in February 2020 but it remains at a very early stage of preparation.</p> <p>Although the existing standard method for Wyre derived a minimum housing requirement figure below that adopted in the Wyre Local Plan, it is not yet clear what housing requirement figure they will pursue in their Partial Review going forward. It is also not clear if the Council will continue with the Partial Review in light of the potential changes to the planning system which are currently being consulted upon. As such, it seems contradictory for the Council to continue with its Partial Review, to meet Wyre's unmet housing requirement given the uncertainty surrounding what Wyre's unmet housing need will be.</p> <p>One of the issues grappled with during the Examination into the Fylde Plan last time was due to Fylde not aligning its timetable with Wyre particularly given their relationships, sharing of evidence and reliance on each other to meet the housing need in their Housing Market Area [HMA]. A similar mistake should not be pursued at this moment in time as it could result in other consequences later in the process.</p>

Respondent	Text of Representations
Emery Planning for Wainhomes North West Ltd	<p>3.4 Wyre Local Plan Policy LP21 commits Wyre Council to a partial review of its Local Plan with the objective of meeting the full OAN. Paragraph 1.26 of the Fylde Local Plan Partial Review Schedule of Revisions states that whether the unmet need of 380 dwellings from the Wyre Local Plan cannot be met in Wyre is a matter for the Partial Review of the Wyre Local Plan and its reassessment of housing need. The local housing need for Wyre calculated using the standard method in the PPG gives a figure of 308 dwellings per annum, which is significantly below the 460 dwellings per annum that the Wyre Local Plan provides for. The Schedule of Revisions therefore states that the housing needs in Wyre, under an assessment using the standard method, will be met in full by the Wyre Local Plan. Any housing need that cannot be met in Wyre, established through Wyre’s Partial Review, is provided for through the new housing requirement range of 275-415 in the Partial Review of the Fylde Local Plan.</p>
Emery Planning for Hollins Strategic Land	<p>3.4 Wyre Local Plan Policy LP21 commits Wyre Council to a partial review of its Local Plan with the objective of meeting the full OAN. Paragraph 1.26 of the Fylde Local Plan Partial Review Schedule of Revisions states that whether the unmet need of 380 dwellings from the Wyre Local Plan cannot be met in Wyre is a matter for the Partial Review of the Wyre Local Plan and its reassessment of housing need. The local housing need for Wyre calculated using the standard method in the PPG gives a figure of 308 dwellings per annum, which is significantly below the 460 dwellings per annum that the Wyre Local Plan provides for. The Schedule of Revisions therefore states that the housing needs in Wyre, under an assessment using the standard method, will be met in full by the Wyre Local Plan. Any housing need that cannot be met in Wyre, established through Wyre’s Partial Review, is provided for through the new housing requirement range of 275-415 in the Partial Review of the Fylde Local Plan.</p>
Paragraph 1.27: conclusion on Wyre’s unmet need and Partial Review	
Home Builders’ Federation	<p>3. The Council are proposing to amend the Local Plan to set out the consideration they have given to the unmet housing need in Wyre. They highlight that the adopted Wyre Local Plan will result in a shortfall of 380 dwellings, which therefore triggers the early review mechanism contained in paragraph 1.27 of the Fylde Local Plan. However, they also identify that the Wyre Local Plan will be subject to a partial review, which includes the objective of meeting the full OAN for Wyre. This has led to the Council proposing to amend paragraph 1.27 to state that a <i>‘Partial Review of the Fylde Local Plan therefore has not needed to incorporate alterations to its strategic policies or housing needs or requirement figure, other than those changes made for other reasons, following consideration of the issue of housing needs in Wyre’</i>. The HBF is concerned by this particularly as there no evidence available at present to demonstrate that Wyre can meet the housing need within their own area.</p>

Respondent	Text of Representations
Emery Planning for Wainhomes North West Ltd	3.5 Paragraph 1.27 of the Schedule of Revisions therefore states that the Partial Review of the Fylde Local Plan has not needed to incorporate alterations to its housing needs or requirement figures following consideration of the issue of housing need in Wyre. Therefore, at present, there is no need for Reason 2 (above) of the plan review.
Gladman Developments	<p>4.2 Duty to Cooperate (Paragraphs 1.26 and 1.27)</p> <p>4.2.1 As identified in Section 3 above, Gladman have significant concerns over the lack of clarity regarding the issue of unmet needs from Wyre Borough Council, and how these will be addressed through the FLP32 Partial Review.</p> <p>4.2.2 This is highlighted through the proposed changes to FLP32 paragraphs 1.26 and 1.27, which state that "Whether the unmet need of 380 dwellings from the Wyre Local Plan (2011-2031) cannot be met in Wyre is a matter for the Partial Review of the Wyre Local Plan's reassessment of housing need in Wyre and how it is to be met', supported by the assumption that when based on the current Standard Method a) Wyre will be able to meet its housing needs in full, and b) any potential unmet need arising from Wyre could be accommodated in Fylde's revised housing target of 275 - 415 dpa.</p> <p>4.2.3 However, there is currently no clarity on this matter, or what the potential level of unmet need from arising from Wyre will be. This will only be confirmed once the Council's own Partial Review proposals are more advanced. Furthermore, the assumption that any unmet could be accommodated within the Fylde's revised housing requirement of 275 - 415 dpa is dependent on this figure being found sound. For the reasons given below, we have significant concerns over this proposal.</p> <p>4.2.5 To ensure that the Local Plan is able to respond to any housing shortfalls arising from adjoining authorities and can accommodate future increases in Fylde's own housing needs, we believe that the Council should now be looking to allocate additional housing sites, over and above those identified in the authority's adopted proposals. This should be on the basis of no reduction in the Council's own housing target, and will help to provide greater flexibility in the authority's housing land supply.</p>
Emery Planning for Hollins Strategic Land	3.5 Paragraph 1.27 of the Schedule of Revisions therefore states that the Partial Review of the Fylde Local Plan has not needed to incorporate alterations to its housing needs or requirement figures following consideration of the issue of housing need in Wyre. Therefore, at present, there is no need for Reason 2 (above) of the plan review.
Cassidy & Ashton for Home Farm	<p>Para. 1.24-1.27</p> <p>The issue of the Duty to Co-operate and the unmet need for Wyre has been continually pushed into the long grass over several years. When the issue was raised by Wyre Council during the examination into the current Local Plan, the Council's position was that because</p>

Respondent	Text of Representations
	<p>Fylde were ahead of Wyre in the Plan cycle it was not possible to estimate an accurate requirement of Wyre’s unmet need and therefore it was appropriate to adopt the plan and address the issue through a partial review. Since then, Wyre have adopted their plan and identified a shortfall of 380 dwellings which they intend to address through their own partial review, ideally within their own Borough, but as Fylde acknowledge in this partial review, it may be necessary for this to catered for in Fylde. Although there are vague comments that the flexible housing requirement of 275-415 dwellings post 2019 will allow for this, in actual fact the matter is not being addressed and conceivably could continue on this basis as the two Local Plans are unlikely ever to be synchronised.</p> <p>This is totally at odds with the planned approach and the duty to cooperate which remains part of the existing planning process.</p> <p>As such, Fylde should address this matter now, once and for all and identify additional land specially to cater for Wyre’s unmet need. As this will result in an additional allocation or allocations, the starting point should be the strategic locations for development of which Lytham St Annes is the largest and most sustainable.</p> <p>The most appropriate site in this context is land west of North Houses Lane, Lytham St Annes [attached], which, particularly now that funding for the Lytham Moss Link Road has been confirmed, represents the most suitable site in the Borough for an additional strategic location which can address the unmet need within the Housing Market Area as a whole.</p> <p>By pushing this to a future decision yet again, the very soundness is the plan is undermined.</p>
Pegasus Group for Hallam Land Management	<p>[follows on from section on local housing need, see under paragraph 9.13]</p> <p>5.7 In terms of the implications on the wider Fylde Coast HMA, and potential unmet need in Wyre, they propose the same approach, using the standard method target (which for Wyre drops from 460 dpa in the adopted plan to 308 dpa and for Blackpool from 280 dpa to 114 dpa). They again argue that there are no exceptional circumstances to depart from this, again using the rationale that the standard method has a similar basis to the adopted requirements from the 2014 Fylde Coast SHMA (all 3 authorities used were subject to the same approach given they are all in one HMA).</p> <p>5.8 This leads to a reduction in annual need across the Fylde Coast from 1,155 dpa to 697 dpa, a drop of 40%.</p> <p>5.9 On this basis Fylde argue that there is no longer any unmet need in Wyre (or the wider HMA) as this was based on an OAN requirement of 479 dpa, and therefore that there is no need for Fylde or Wyre to allocate any additional sites. Instead Fylde propose to soften their requirement by introducing a range as set out above.</p>

Respondent	Text of Representations
Paragraph 1.28: tests of soundness	
	No representations received in relation to this section
Paragraph 1.40: existing paragraphs consolidated	
	No representations received in relation to this section
Paragraph 1.41: Partial Review preparation	
	No representations received in relation to this section
Paragraph 1.42: evidence	
Cassidy & Ashton for Home Farm	<p>Para. 1.42</p> <p>There is a requirement as acknowledged in the partial review to rely on up to date information. Unfortunately, the current global pandemic has had an unknown impact upon the development industry. Although the evidence base refers to this, it remains an unknown and it is inappropriate not to take this into account. It is therefore essential that this data is continually updated to take the effects of the pandemic into account.</p>
Paragraph 1.44: technical assessments	
	No representations received in relation to this section
Cross-cutting themes: equality	
	No representations received in relation to this section

Respondent	Text of Representations
Cross-cutting themes: viability	
Bryning-with-Warton Parish Council	<p>SDPR01 : Schedule of Revisions to the FLP32;</p> <p>Chapter 1(Page 20/21) Cross Cutting Themes. Viability. Removal of out of date text from NPPF12 replacement with text from NPPF19 and PPG -</p> <p>'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan. So it's okay to have policies but it's just they must not stop deliverability of the plan? 'Defeats the purpose of having a policy then doesn't it?</p> <p>'Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.' Surely if the cumulative cost of a sustainable development is not viable it undermines deliverability of the plan?</p>
Paragraph 3.4: 12 core principles	
	No representations received in relation to this section
Policy DLF1	
Story Homes	<p>Fylde Council propose to amend Policy DLF1 to denote a housing requirement range as opposed the previously fixed figure. The Housing Requirement is to be amended from 8,715 new homes across the plan period to 6,895-8,715 new homes across the plan period. The Council have noted that this change reflects the updated methodology for calculating housing requirements, as per NPPF 19, however the use of a housing requirement range can be seen as ambiguous. There is a risk that the Council aim for the lower end of the range, as opposed to the higher figure as previously published.</p> <p>It should also be noted that a housing requirement should be viewed as a minimum figure with which the Council should aim towards and improve upon. This is echoed in Central Governments intentions to bring forward a significant amount of new high-quality housing in the coming years. The use of a range implies not only a minimum target but also a ceiling to development. This is not reflected within NPPF 19, it is considered that the range figure should be removed, and the housing requirement should be clearly stated as a minimum figure.</p>

Respondent	Text of Representations
	<p>In addition to this, recent publications from Central Government indicate that changes to planning policy may be on the horizon. Within the consultation paper 'Changes to the current planning system', a revised Standard Method is proposed in order to rebalance the housing requirement across the Country but also bring the national delivery rate closer to the 300,000 new homes target as stated by Central Government. Through the revised Standard Method Fylde's housing requirement increases from 415 dpa to 488 dpa, although this methodology will not be incorporated into the partial review it provides a clear indication of future projected growth for Fylde. Additionally, the LHN for Wyre increases from 296 dpa to 383 dpa under the revised Standard method. This may present a future scenario where Fylde is required to meet Wyre's unmet need.</p>
<p>Lichfields for Taylor Wimpey</p>	<p>The proposed changes set out in the Schedule of Revisions to the Fylde Local Plan only proposed to amend the housing requirement in Policy DLF1 but does not seek to consider the impact on employment land requirement of the impacts this may inadvertently have. Retaining the employment land requirement as adopted but reducing the housing requirement which was previously aligned could result in a promotion of unsustainable commuting patterns in Fylde which would be in conflict with the central tenant [sic.] of the Framework (2019) to promote sustainable development.</p>
<p>Home Builders' Federation</p>	<p>Proposed policy DLF1 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons:</p> <p>4. The Council proposes to amend this policy to state that the 'Local Plan will provide sites for a minimum of 6,895-8,715 new homes . . . over the plan period to 31 March 2032'.</p> <p>5. The HBF is concerned that the policy does not provide a clearly written and unambiguous policy and is therefore not consistent with national policy¹. Providing the housing requirement as a range does not provide clarity and it may not always be clear how this should be considered as part of the decision-making process. The HBF is also concerned that it is not clear whether the figure is a net figure or not.</p> <p>6. The HBF is concerned by the use of a housing range, which although the text still states 'a minimum of', still seems to suggest that the top end of the range is a cap and this could limit the development of homes. The HBF does not consider that this is line with national policy which looks to support the Government's objective of significantly boosting the supply of homes.</p> <p>7. The Housing Needs and Requirement Background Paper (March 2020) sets out the calculation of the Local Housing Need (LHN) for Fylde using the standard methodology, it identifies a LHN of 275 dwellings per annum (dpa). It also highlights that the evidence for the adopted plan identified an Objectively Assessed Need (OAN) of between 410 and 430dpa, and that the Inspector concluded that the housing requirement figure of 415dpa was sound. The Paper goes on to explain that the LHN will only be applied from 2019/20, and that the adopted figure of 415dpa will be applied to the period 2011/12 to 2018/19, giving a requirement of 6,895 of the plan period.</p>

Respondent	Text of Representations																								
	<p>8. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It is also noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. National policy identifies that the Standard Method provides a minimum starting point, and that there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG2 states that these circumstances can include growth strategies for the area; strategic infrastructure improvements; taking unmet need from neighbouring authorities; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.</p> <p>9. There have been significant infrastructure improvements in Fylde and the surrounding area, for example the Preston Western Distributor and the A585 Windy Harbour to Skippool improvement scheme. The Preston Western Distributor is scheduled to open early in 2023 and is intended to promote new housing and business development in the area, while increasing capacity on the existing local road network. The A585 Windy Harbour to Skippool improvements are expected to remove the current bottleneck at Five Lane Ends and give the opportunity to improve the A585 Mains Lane/A588 Shard Road junction. The A585 DCO on the 9th April 2020 was granted consent by the Secretary of State.</p> <p>10. The Fylde Coast SHMA (2014) identified that Fylde, Wyre and Blackpool form a single housing market area (HMA). The Wyre Local Plan was adopted with a housing figure below the OAN and therefore created a shortfall of homes with the HMA of 380 dwellings. Blackpool has not identified any shortfall in their adopted Plan. The Draft Statement of Common Ground (March 2020) highlights that it will be for Wyre to determine whether it reviews its housing requirement figure through the Partial Review. It also identifies disagreement in relation to Fylde's statement that <i>'the revised housing requirement in the Partial Review of the Fylde Local Plan to 2032 allows account to be taken of any need from neighbouring authorities that cannot be met, up to the amount of unmet need from the adopted Wyre Local Plan (2011-2031), should any need that cannot be met exist following Wyre's Partial Review'</i>.</p> <p>11. MHCLG statistics shown in Table 1 below, highlight that 1,926 dwellings have been built over the last five years, at an average of 385dpa, with the numbers increasing year on year, this suggests that the housing need is above the LHN identified by the standard method. The Fylde Local Plan was only adopted in October 2018, so it is likely that the higher figures seen at the end of the period would continue as allocations are brought forward.</p> <table border="1" data-bbox="465 1098 2128 1305"> <thead> <tr> <th colspan="8" data-bbox="465 1098 2128 1161">Table 1: MHCLG Net Additional Dwellings</th> </tr> <tr> <th data-bbox="465 1161 674 1233"></th> <th data-bbox="674 1161 882 1233">2014/15</th> <th data-bbox="882 1161 1090 1233">2015/16</th> <th data-bbox="1090 1161 1299 1233">2016/17</th> <th data-bbox="1299 1161 1507 1233">2017/18</th> <th data-bbox="1507 1161 1715 1233">2018/19</th> <th data-bbox="1715 1161 1924 1233">Total</th> <th data-bbox="1924 1161 2128 1233">Average</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 1233 674 1305">Fylde</td> <td data-bbox="674 1233 882 1305">207</td> <td data-bbox="882 1233 1090 1305">304</td> <td data-bbox="1090 1233 1299 1305">455</td> <td data-bbox="1299 1233 1507 1305">470</td> <td data-bbox="1507 1233 1715 1305">490</td> <td data-bbox="1715 1233 1924 1305">1,926</td> <td data-bbox="1924 1233 2128 1305">385</td> </tr> </tbody> </table> <p>12. As has been previously set out, the Fylde SHMA Addendum 3: Analysis of the OAN using the 2014-based SNPP and SNHP (Turley, May 2017) identifies an OAN of between 410-430dpa. This was assessed as part of the Examination of the Fylde Local Plan (December 2017) and</p>	Table 1: MHCLG Net Additional Dwellings									2014/15	2015/16	2016/17	2017/18	2018/19	Total	Average	Fylde	207	304	455	470	490	1,926	385
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Respondent	Text of Representations
	<p>the Inspector considered that a housing requirement of 415dpa was sound (Inspector’s Report, September 2018). This evidence and the assessment through the examination process suggest the housing need is higher than the LHN identified by the standard method.</p> <p>13. It is noted that the 2018-based household projections are now available, and as a comparison, between 2020 and 2030 the 2014-based projections show an increase of 2,499 whilst the 2018-based projections show an increase of 4,280.</p> <p>14. Planning for the Future (March 2020) states that the Government will review the formula for calculating Local Housing Need and is looking to introduce a new approach which encourages greater building and makes sure the country is planning for the delivery of 300,000 new homes a year. The ‘Changes to the current planning system’ (August 2020) document sets out these proposed changes to the standard method for assessing local housing need. These changes include consideration of the existing housing stock and an affordability adjustment that takes into account changes over time. This new method identifies an indicative housing figure of 488dpa for Fylde, again the consultation identifies that the standard method provides the starting point and not the final housing requirement. This suggests that the housing need for Fylde could be much higher than currently proposed. In addition, the LHN for Wyre calculated using this method will also increase to 383dpa, which could increase the necessity for Fylde to meet their unmet need.</p> <p>15. The Plan period runs from 2011 until 2032, the HBF are concerned that this does not provide a 15-year period from adoption and will at best only look forward 11 years. This would be contrary to the NPPF which states that ‘strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities’. Therefore, the HBF consider that the Council should look to extend the Plan period, and consider review of any other policies that may be impacted by this need to ensure a 15-year period from adoption.</p>
<p>Emery Planning for Wainhomes North West Ltd</p>	<p>2. Reason 1 – Conformity with the 2019 Framework</p> <p>Proposed revision to Fylde’s housing requirement</p> <p>2.1 Policy DLF1 of the adopted Fylde Local Plan sets out the housing requirement for Fylde of 8,715 over the plan period. This equates to a requirement of 415 dwellings per annum. The Schedule of Revisions proposes to amend this requirement to a range of between 6,895 – 8,715 dwellings over the plan period, which equates to a range of between 275 – 415 dwellings per annum. The justification for this is cited as being due to a revised housing requirement figure resulting from the change to housing needs methodology in the Framework (2019).</p> <p>2.2 We object to the changes and justification provided for the revised housing requirement on three grounds, as follows.</p> <ol style="list-style-type: none"> 1. National policy does not support a plan review based on a lower Local Housing Need identified by the standard method to that in the adopted Local Plan. 2. The Partial Review does not comply with the Duty to Cooperate.

Respondent	Text of Representations
	<p>3. The revised housing requirement conflicts with up-to-date evidence of housing need based on the emerging methodology for calculating local housing need.</p> <p>4. The application of the revised requirement for 5 year supply.</p> <p>2.3 We address each point in turn.</p> <p>1. National Planning Policy Framework (The Framework) and National Planning Practice Guidance (PPG)</p> <p>2.4 Reason 1 states that the revisions are required to ensure conformity with the updated Framework.</p> <p>2.5 The Government does advise when there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies of a development plan earlier than the statutory minimum of 5 years. Paragraph 33 of the Framework states that:</p> <p style="padding-left: 40px;"><i>“Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly.”</i></p> <p>2.6 The PPG provides clarification on when local housing need will be considered to have changed significantly. It states:</p> <p style="padding-left: 40px;"><i>“How often should a plan or policies be reviewed?</i></p> <p style="padding-left: 40px;"><i>To be effective plans need to be kept up-to-date. The National Planning Policy Framework states policies in local plans and spatial development strategies, should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary.</i></p> <p style="padding-left: 40px;"><i>Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Most plans are likely to require updating in whole or in part at least every 5 years. Reviews should be proportionate to the issues in hand. Plans may be found sound conditional upon a plan update in whole or in part within 5 years of the date of adoption. Where a review was undertaken prior to publication of the Framework (27 July 2018) but within the last 5 years, then that plan will continue to constitute the up-to-date plan policies unless there have been significant changes as outlined below.</i></p> <p style="padding-left: 40px;"><i>There will be occasions where there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies earlier than the statutory minimum of 5 years, for example, where new cross-boundary matters arise. <u>Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for a quickly as reasonably possible.</u>” (our emphasis)</i></p>

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	<p>2.7 There is no justification in the Framework or the PPG for an early plan review based on the adopted housing requirement being higher than the requirement generated by the standard method. In that context a revision through this Partial Review to reduce the housing requirement of 415 dwellings per annum to 275 dwellings per annum has no support in the Framework or PPG. Therefore, on this reason alone the Partial Review is not entitled to review the requirement in Policy H1. It also runs contrary to the key objective of the Framework which is to boost housing delivery.</p> <p>2.8 Paragraph: 039 Reference ID: 61-039-20190315 of the PPG sets out what the steps are for preparing evidence. It states:</p> <p><i>What are the steps in gathering evidence to plan for housing?</i></p> <p><i>Strategic policy-making authorities will need a clear understanding of housing needs in their area. The steps in building up this evidence include:</i></p> <ul style="list-style-type: none"> ○ <i>establishing the overall housing need (conducted using the standard methodology unless exceptional circumstances justify an alternative -see local housing need guidance);</i> ○ <i>identifying the housing need of specific groups;</i> ○ <i>working with neighbouring authorities and key stakeholders to establish the housing market area, or geography which is the most appropriate to prepare policies for meeting housing need across local authority boundaries;</i> <p><i>Authorities can use this evidence to:</i></p> <ul style="list-style-type: none"> ○ <i>prepare or update their Strategic Housing Land Availability Assessment jointly with the authorities within the defined area or individually to establish realistic assumptions about the suitability, availability, and achievability (including economic viability) of land to meet the identified need for housing over the plan period, including robust evidence of deliverability for those sites identified for the first 5 years of the Plan</i> ○ <i>prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.</i> <p>2.9 With regard to the first and second bullet points, to establish the overall housing need it is necessary to apply the standard method unless exceptional circumstances justify an alternative. A hyperlink then takes the reader to the section titled “Housing and economic needs assessment - Guides councils in how to assess their housing needs”. The LPA has undertaken the standard method as set out in the PPG.</p> <p>2.10 However paragraph: 010 Reference ID: 2a-010-20190220 states:</p> <p><i>“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:</i></p> <ul style="list-style-type: none"> • <i>growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);</i>

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	<p>2.14 The draft standard method would reflect and assist in delivering the affordable housing in the SHMA. As a minimum the LPA should have undertaken an affordable housing update to understand the local circumstances as to whether the affordability ratio is appropriate. It must be remembered that providing homes for those in affordable housing need is a crucial part of the planning process and a simple application of the standard method will not meet their needs. Therefore, the Plan Review should not progress on this basis.</p> <p>2.15 We examine bullet 3 in the next section titled Duty to Co-operate.</p>
Savills for Fylde Coast Care Village Ltd	<p>In light of the above, the site is considered to be entirely suitable for redevelopment for new housing to assist the Council in meeting its requirement. Accordingly, this should be reflected in the Local Plan under the relevant policies relating to housing development, namely Policy DLF1: 'Development Locations for Fylde'.</p>
Emery Planning for Hollins Strategic Land	<p>2. Reason 1 – Conformity with the 2019 Framework</p> <p>Proposed revision to Fylde’s housing requirement</p> <p>2.1 Policy DLF1 of the adopted Fylde Local Plan sets out the housing requirement for Fylde of 8,715 over the plan period. This equates to a requirement of 415 dwellings per annum. The Schedule of Revisions proposes to amend this requirement to a range of between 6,895 – 8,715 dwellings over the plan period, which equates to a range of between 275 – 415 dwellings per annum. The justification for this is cited as being due to a revised housing requirement figure resulting from the change to housing needs methodology in the Framework (2019).</p> <p>2.2 We object to the changes and justification provided for the revised housing requirement on three grounds, as follows.</p> <ol style="list-style-type: none"> 1. National policy does not support a plan review based on a lower Local Housing Need identified by the standard method to that in the adopted Local Plan. 2. The Partial Review does not comply with the Duty to Cooperate. 3. The revised housing requirement conflicts with up-to-date evidence of housing need based on the emerging methodology for calculating local housing need. 4. The application of the revised requirement for 5 year supply. <p>2.3 We address each point in turn.</p> <p>1. National Planning Policy Framework (The Framework) and National Planning Practice Guidance (PPG)</p> <p>2.4 Reason 1 states that the revisions are required to ensure conformity with the updated Framework.</p> <p>2.5 The Government does advise when there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies of a development plan earlier than the statutory minimum of 5 years. Paragraph 33 of the Framework states that:</p>

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	<p>actual affordable need identified in the SHMA. Therefore, in the context of the PPG, the LPA cannot simply dismiss the findings of the SHMA as they do in EDPR04.</p> <p>2.12 The Local Plan Inspectors Report states:</p> <p><i>“Affordable housing needs</i></p> <p><i>59. The 2013 SHMA identified a need for 207 affordable homes per annum. This was updated to 249 dpa in the Addendum 1 report.</i></p> <p><i>60. Whilst it has been suggested that the needs identified are too high, this has not been convincingly evidenced in detail. Indeed as the definitions and method for assessing affordable housing needs as used within the SHMA and its addendum follow those set out within the PPG, the resultant need identified is robust.</i></p> <p><i>61. It has also been suggested that an uplift should be applied to the OAN to reflect the need for affordable housing. It is unlikely that the full identified need will be delivered through provisions set out within the Plan. Based on the Council’s proposed affordable housing target of 30% for relevant new residential developments, this would require more than 800 dwellings per annum to be delivered to achieve the affordable housing figure in full. I agree with the Council that this is completely unrealistic, bearing in mind that the OAN is based on a robust assessment of the number of people likely to want or need to live in the Borough and that between 1991 and 2017 the highest number of dwellings constructed was 502 in 1992/93.</i></p> <p><i>62. Moreover, provision against the revised OAN would in itself represent a significant uplift on historic rates of affordable housing completions, noting that in 2015/16 fewer than 40 affordable dwellings were delivered. Providing 410-430 dpa would contribute towards meeting a significant proportion of the affordable housing need identified, providing around 120-130 dwellings per annum.”</i></p> <p>2.13 Therefore, whilst there was not a specific uplift above the proposed OAN for affordable, the Inspector was clear that the affordable housing that would be delivered using the OAN would represent a significant uplift on historic rates of affordable homes which was necessary. By using the standard method, the Council is ignoring the Inspector’s conclusion on this issue and will have a significantly detrimental impact on the provision of affordable homes.</p> <p>2.14 The draft standard method would reflect and assist in delivering the affordable housing in the SHMA. As a minimum the LPA should have undertaken an affordable housing update to understand the local circumstances as to whether the affordability ratio is appropriate. It must be remembered that providing homes for those in affordable housing need is a crucial part of the planning process and a simple application of the standard method will not meet their needs. Therefore, the Plan Review should not progress on this basis.</p> <p>2.15 We examine bullet 3 in the next section titled Duty to Co-operate.</p>

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Cassidy & Ashton for Home Farm	<p>Policy DLF1</p> <p>It remains ironic that despite promoting a policy that identifies Strategic Locations for Development, the majority of allocations have remained outside of the key settlement and principle Strategic Location for Development, Lytham St Annes.</p> <p>The largest allocation at Queensway is only making slow progress and has resulted in alternative funding having to be found to complete the link road.</p> <p>In line with the comments relating to para. 1.24 to 1.27 above, it is therefore appropriate that this location is given priority in identifying an additional site[s] to address the unmet need in Wyre.</p>
Pegasus Group for Hallam Land Management	<p>Policy DLF1: Development Locations for Fylde – See our comments within sections 5 and 6. [under Policy H1] The Local Plan should provide sites for 10,550 dwellings over the plan period to 31 March 2032, and more should the plan period be extended as suggested. Related supporting text within chapters 1 and 5 should also be updated on this basis.</p>
Paragraph 7.12: Biodiversity in Areas of Separation	
	No representations received in relation to this section
Policy GD4	
Home Builders' Federation	<p>Proposed policy GD4 is not considered to be sound as it is not positively prepared or consistent with national policy for the following reasons:</p> <p>16. The Council are proposing to make amendments to the policy for development in the Countryside. The HBF does not consider that this policy is in line with NPPF 2019, which looks for planning policies to be responsive to local circumstances, to support housing developments that reflect local needs and to locate housing where it will enhance or maintain the vitality of rural communities. It then goes on to set more restrictive policies for 'isolated homes in the countryside', these are similar to those currently included in Policy GD4. The HBF consider that this policy should be amended to better reflect the policy set out in NPPF.</p>

Respondent	Text of Representations
DePol Associates	<p>Partial Review of the Fylde Local Plan to 2032 (FLP32)</p> <p>I refer to the above and consultation in respect of proposed alterations to the Fylde Local Plan which was adopted by the Council on 22 October 2018. Please accept this letter as representations by De Pol Associates in respect of proposed alterations to Policy GD4 Development in the Countryside.</p> <p>Representations are made on the basis that the proposed alterations do not meet the tests of soundness as set out in paragraph 35 of NPPF. As outlined in these representations it is considered that the proposed changes, in respect of Policy GD4 are not positively prepared, have not been justified and are not consistent with national policy.</p> <p>These representations relate both to proposed additional wording, inserted by the Council under criterion a) of Policy GD4, together with elements of criterion a) of Policy GD4 that the Council has not proposed to change. These representations detail where it is considered that the policy should be amended in order to meet the tests of soundness.</p> <p>The following provides a comprehensive response to the Council’s proposed alterations to Local Plan Policy GD4.</p> <p>Positive preparation</p> <p>It is considered that the proposed change is not positively prepared but, instead takes a negative approach to development. The policy would place greater restriction on development than the current policy does.</p> <p>It is considered that the Council has incorrectly interpreted paragraph 84 in the context of policy GD4. This is underlined by the Council’s selective inclusion of parts of the paragraph and must be read in the context of the leading sentence of GD4 which ultimately seeks to limit development not permit it.</p> <p>Taken as a whole, with the proposed introduced new wording, the forms of development permissible in the countryside, under criterion a, would have to meet local business or community needs. As proposed the amended policy would not allow for agriculture, horticulture or forestry development which met needs which were not necessarily local.</p> <p>There are no reasons why non-local requirements may not also be acceptable in the wider setting of the Local Plan and NPPF. The further layer of restriction imposed by this proposed alteration does not serve a positive purpose and only serves to place further unnecessary restrictions on development which are not required.</p> <p>Justified</p> <p>The proposed change to the policy is not justified in the context of NPPF paragraph 35. There has been no clear consideration as to whether the alternative of not altering the policy and not inserting additional wording would be consistent with NPPF. The policy, as currently worded is not considered to preclude compliance with the requirements of NPPF paragraph 84. The existing policy provides for development beyond settlement boundaries, to meet local business and community needs without making explicit reference to it.</p>

Respondent	Text of Representations
	<p>The alterations proposed by the Council preclude forms of development which are currently permitted by the policy and there is no justification as to why those have been excluded i.e. development which does not respond to local business or community needs. Indeed paragraph 83 of NPPF is clear that policies should enable the growth and expansion of all types of businesses in rural areas.</p> <p>Further to this it is also considered that the incorporation of the proposed final sentence is also not justified in the setting of the existing policy and wider policies in the plan. Policy INF1 requires development to improve sustainability and accessibility, where appropriate, particularly through criteria e) and f). Equally policies GD7 and ENV1 ensure that development takes account of and respects surroundings whilst GD7 also provides policy in respect of highway safety. It is unclear, in these circumstances, why the final additional sentence is required or justified.</p> <p>In reviewing Policy GD4, the Council has left a proportion of the policy unchanged but in proposing to amend it the Council will have reviewed the policy in its entirety. In this context it is considered that there is no justification for the retention of the words ‘small-scale’ in respect of tourist accommodation and ‘very exceptionally, larger scale’ in relation to tourism development particularly as this approach is not supported in paragraph 83 of NPPF. The retention of these size parameters is not justified to any degree, particularly where there are other policies in the plan, as identified above, which proposals will need to be assessed against. The unchanged wording of the condition would suggest that small scale tourism development (which was not accommodation) would not be acceptable but large scale potentially would be. A reasonable alternative would be for policy GD4 to not refer to scale and this alternative approach would be justified by the controls administered via other policies in the plan and NPPF.</p> <p>Consistent with National Policy</p> <p>It is considered that the proposed wording is inconsistent with national policy because of the way it has selectively utilised paragraph 84 of NPPF and, furthermore, the way the policy is now worded lacks clarity as to which elements the “meeting local business and community needs for the purposes of” should apply to. The amended wording also fails to serve a purpose, merely duplicating the policies in the NPPF.</p> <p><u>Lack of clarity</u></p> <p>Paragraph 16 of NPPF sets out a clear requirement that plans should contain unambiguous policies so it is evident how a decision maker should react to proposals. The current proposed wording of policy GD4 fails to achieve this. It is unclear in the proposed policy wording whether the local business and community needs applies to “other uses appropriate to a rural area...”. This second part of criterion a) is separated by a semi-colon from the first part suggesting that it does not apply. However, the proposed altered policy is then concluded with a further extract from paragraph 84 which suggests that the requirement for development not to have unacceptable impact on local roads etc is applicable to all parts of the policy. Clearly there is an ambiguity in the policy. In order to clarify the policy, it is proposed that the criterion is split into two and the two parts of the policy separated out. A proposed approach to this is outlined later in this representation.</p> <p><u>Lack of purpose</u></p>

Respondent	Text of Representations
	<p>NPPF Paragraph 16 f) requires policies to serve a purpose and avoid duplication, including policies in the NPPF. The insertions proposed in respect of policy GD4 serve no purpose other than to replicate some of the wording that is already included in paragraph 84. As identified earlier in these representations, the existing policy is not contrary to NPPF paragraph 84 and other policies in the plan respond to the other issues relating to character and accessibility. It is not clear what the proposed alteration achieves and as such is contrary to NPPF paragraph 16 in this regard.</p> <p><u>Selective approach to NPPF paragraph 84</u></p> <p>In respect of the Council’s selective approach to NPPF Paragraph 84, the paragraph identifies that planning policies should recognise that sites to meet rural needs may need to be found beyond existing settlement boundaries. It does not state that development for local business and community needs is the only form of development which should be permitted beyond development boundaries. The response of the Council to this paragraph in NPPF and the proposed alterations to policy GD4 would suggest that this is the case.</p> <p>Policy GD4, as adopted, is not contrary to the requirements of paragraph 84 and would not pose a barrier to development for local businesses and community needs in the countryside. Rather the changes proposed by the Council adds another layer to this existing policy which would constrain development which would otherwise be acceptable.</p> <p><u>General conformity with NPPF</u></p> <p>NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, with there being three overarching objectives (economy, social and environmental), which are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each objective. Paragraph 9 states that these objectives should be delivered through the preparation and implementation of plans and the application of the policies in the Framework. Anita Coleman v SoS for CLG [2013] EWHC 1138 (admin) confirms that for a policy to be consistent with the Framework it must adopt a cost/benefit analysis approach, allowing for a judgment to be made as to whether an adverse impact would be outweighed by the scheme’s benefits. It does not support policies which place a blanket ban on particular types of development and preclude the ability to undertake this cost/benefit analysis. The wording of the proposed policy would limit the forms of development which would be acceptable in the Countryside contrary to the requirement for a cost/benefit approach.</p> <p>Notable in this is the retention of reference to ‘small-scale’ and ‘exceptionally, large scale’ in the proposed revised policy. These specific references prohibit development not in accordance with these scales from being approved under GD4. For example, a small-scale tourist development, which was not accommodation, would be directly contrary to this policy and would not be permissible under amended policy GD4 regardless of its benefits. If the reference to scale were to be removed this would not preclude the refusal of unacceptable proposals for tourist development in the context of other policies and NPPF. Furthermore NPPF Paragraph 83 identifies that policies should enable “sustainable rural tourism and leisure developments which respect the character of the countryside”. This does not suggest that scale of any particular leisure or tourism use should be the determinative factor in whether a scheme is acceptable or not. The inclusion of a scale parameters in respect of leisure and tourism developments is clearly inconsistent with paragraph 83 of NPPF in any event.</p>

Respondent	Text of Representations
	<p>Addressing Representations</p> <p>It is considered that proposed Policy GD4 be amended to address the representations made in this submission. It is considered that the following amendment would be sound in the setting of paragraph 34 of NPPF:</p> <p>Development in the Countryside, shown on the Policies Map including Inset Plans, will be limited to:</p> <ul style="list-style-type: none"> a) that needed for purposes of agriculture, horticulture or forestry; b) other uses appropriate to a rural area, including uses which would help to diversify the rural economy, including tourist accommodation, holiday caravan sites and tourism development; c) the re-use or rehabilitation of existing permanent and substantial buildings; d) extensions to existing dwellings and other buildings in accordance with Policy H7; e) development essentially needed for the continuation of an existing enterprise, facility or operation, of a type and scale which would not harm the character of the surrounding countryside; f) isolated new homes in the countryside which meet the criteria set out in Policy H6; g) minor infill development; h) development needed to support entry-level exception sites for first-time buyers (or those looking to rent their own home) on land not already allocated for housing which meets the criteria set out in Policy GD7. <p>I trust these representations will be given full consideration as part of this consultation period. I would be grateful if I could be updated on progress with the partial review as it progresses.</p>
Paragraph 7.14: development in the countryside	
	No representations received in relation to this section
Paragraph 7.21: mixed use development	
	No representations received in relation to this section

Respondent	Text of Representations
Policy GD7 Achieving Good Design in Development: health and wellbeing and quality not diminished	
Canal & River Trust	The Trust welcome the expanded policy GD7 criteria I) with the inclusion to 'promote health and wellbeing'. Although development is unlikely next to our waterway within authority area, our waterways would have a role to play in supporting communities health and wellbeing, by providing free access to our green/blue infrastructure network.
Sport England	In addition, Sport England also welcome the amendments proposed to GD7 regarding the promotion of health and wellbeing as part of creating safe and accessible environments. This approach is consistent with Sport England's guidance regarding Active Design and therefore we welcome inclusion of general support for promoting active design to enable communities to be more active in their day-to-day lives and achieve health and well-being through design. Further information relating to active design can be found in our previous response and in our Active Design Guidance.
Paragraph 8.17: demand for land	
Bryning-with-Warton Parish Council	<p>Chapter8 (Page 28) The Fylde Economy</p> <p>Deletion and been replaced with a more general reference to the Framework. -</p> <p>'should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose and land allocations should be regularly reviewed. Performance Monitoring Indicator 5, in Appendix 8, sets out a target / policy outcome recording the cumulative take-up of land for employment development from 1 April 2011 in relation to the plan period requirement of 60.6 Ha.</p> <p>Again concerns regarding the impact this may have on the long argued potential of Warton 'Enterprise Zone' and now several years down the line nothing has materialised thus the future in favour of housing as part of this 'Strategic Location'. Will the Parish Council be included in carrying out the 'Regular Review'?</p>
Paragraph 8.22: rural areas	
	No representations received in relation to this section

Respondent	Text of Representations
Policy EC5 Vibrant Town, District and Local Centres	
	No representations received in relation to this section
Paragraph 8.55: town centre first approach	
	No representations received in relation to this section
Paragraphs 9.10, 9.11 and 9.12: consolidation of paragraphs	
	No representations received in relation to this section
Paragraph 9.13: local housing needs assessment	
Turley for Strategic Land Group	<p>The FLP32 sets out that a key change introduced by the revised NPPF is that local housing needs should be based on starting point calculated according to a “standard method” (SM). The SM calculates a minimum housing need figure of:</p> <ul style="list-style-type: none"> • 272 dwellings per annum (dpa) for Fylde. This is 143 dpa less than the requirement for 415 dpa established by Policy H1 (Housing Delivery and the Allocation of Housing Land) of the FLP32, which was established according to an ‘objective assessment of need’ (OAN) and found sound following independent examination. <p>[Continues with need figure for Wyre: see paragraph 1.26]</p> <p>The national Planning Practice Guidance (PPG) is explicit that the SM identifies only baseline housing needs, i.e. it provides only a “...minimum starting point in determining the number of homes needed in an area...”. The PPG therefore notes that the number of new homes needed in an area may be higher than the SM indicates (Paragraph: 010, Reference ID: 2a-010-20190220), and makes clear that this will “...need to be assessed...” before the identified need is translated into a housing requirement figure in a Local Plan. Despite this, the Council is seeking to transpose the minimum SM figure into the FLP32 as the bottom end of the housing requirement range. SLG considers that this is unsound.</p> <p>The household projections which underpin the SM simply extrapolate past trends experienced between 2009 and 2014 during the recession. This period was dominated by significant reductions in employment and housing delivery. It resulted in constrained household</p>

Respondent	Text of Representations
	<p>formation, worsening affordability and the outmigration of younger age groups. It resulted in a significant under-supply of new homes against the North West RSS and FLP32 housing requirement figures during the relevant period, as illustrated in Figure 1.</p> <p>Figure 1: Housing trajectory for Fylde, 2003/04 to 2018/19</p> <p>[see original representation in the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>The adoption of the minimum “...starting point...” SM figure as a housing requirement will ‘lock in’ these historic and recessionary trends. This does not recognise Fylde’s particular housing needs and is not consistent with the requirement of the NPPF to plan positively (NPPF, paragraph 11 and 35a)).</p> <p>The Council has failed to assess whether circumstances in Fylde mean that the minimum starting point SM figure should be adjusted upwards, despite the clear requirement to do so in the PPG. The PPG makes clear that housing need may exceed the past recessionary trends, for example where, inter alia, growth strategies or infrastructure improvements might stimulate higher housing demand. There is no consideration or assessment in the Housing Needs and Requirement Background Paper (March 2020) or elsewhere within the evidence base of the effect of such drivers of growth in Fylde on the baseline housing need figure as calculated by the SM. The adoption of the SM figure as the housing requirement for the Borough, even as the bottom end of a range, is therefore unjustified and inconsistent with the requirements of national policy, and is therefore unsound.</p> <p>The standard method figure will be ineffective at meeting the Borough’s full housing needs</p> <p>The objective assessment of housing needs (OAN) undertaken to inform the FLP32 identified that the delivery of c.410-430 dpa is required to meet the Borough’s full housing needs over the period to 2032. This resulted in the establishment of a housing requirement figure of 415 dpa. The examining Inspector noted that this represented an uplift on a demographic baseline of 274 dpa – which is notably similar to the SM baseline (272 dpa) – and concluded that such an uplift was justified and necessary to ensure that the requirement is effective at meeting the full needs of the Borough.</p> <p>[paragraph follows regarding housing requirement: see under Policy H1]</p> <p>The housing needs evidence base for the FLP321 made clear that the adopted requirement figure was identified with regard to employment-led modelling scenarios, i.e. that an uplift from the 274 dpa demographic baseline to the 415 dpa requirement was required in order to, inter alia, support anticipated and planned job growth in the Borough. It is therefore clear that the SM figure will be similarly ineffective at supporting the Borough’s growth.</p> <p>This is particularly evident given:</p> <ul style="list-style-type: none"> • The similarity between the demographic baseline of 274 dpa – which was disregarded as being insufficient – and the minimum starting point SM figure of 272 dpa. • The draft revised SM published by the Government as part of its proposed changes to the planning system² identifies a much higher minimum housing need figure for Fylde of 488 dpa (see below), higher even than the adopted requirement in the FLP32. This provides

Respondent	Text of Representations
	<p>further evidence that the scale of the need for new homes in Fylde is much higher than that being planned for by the FLP32 and the Partial Review.</p> <p>Growth at the Enterprise Zones requires increased housing provision, not less</p> <p>The Inspector’s Report of the examination of the FLP32 noted that the 415 dpa requirement was insufficient to support any job growth within the Borough’s Enterprise Zones (EZ), and that the implications of any such growth for the housing requirement would need to form part of the review:</p> <p><i>“It has also been suggested that the OAN should be significantly higher to take account of the designated Enterprise Zones (EZs) at Blackpool airport and Warton aerodrome (which forms part of the Lancashire Enterprise Zone). However, I have not seen definitive evidence of firm plans, timescales and likely jobs numbers to be created at these EZs and therefore an increase in the OAN in respect of the EZs is not justified. Indeed some representors suggest that because of the lack of firm proposals on delivering economic growth and jobs at the EZs, the need for housing in Fylde should be significantly reduced. However the OAN and economic forecasting carried out for the Council do not take account of jobs growth at the enterprise zones and the Plan’s economic strategy is not dependent on them coming forward. As such no reduction in the OAN is justified in this regard either. A reasonable approach is to review this matter when more concrete evidence becomes available or at the 5 year review of the Plan, whichever is soonest.”</i> (paragraph 56)</p> <p>The requirement to review the housing requirement for Fylde in the event of jobs growth within the EZ’s is identified as an explicit requirement within the FLP32, as indicators 6 and 7 within the performance monitoring framework set out at Appendix 8.</p> <p>There is clear evidence that the number of jobs within the EZs is growing. In particular, the most recent progress report on the Blackpool Airport EZ to the Blackpool, Fylde and Wyre Economic Prosperity Board in January 2020 confirmed that to date:</p> <ul style="list-style-type: none"> • “A total of 202 live enquiries are currently logged for Blackpool EZ. • Some 73 businesses have located to the Enterprise Zone since April 2016. • A total of 1520 jobs have located to the Enterprise Zone, this figure includes jobs new to the area, safeguarded jobs within Blackpool and construction full time equivalent jobs.” <p>Further developments within the EZ’s are emerging and will contribute further job growth. For example, in July 2020 Blackpool Council granted planning permission for a new 40,000sqft commercial unit within the EZ which is estimated to bring 85 new jobs to the EZ, rising to 100 within the next five years.</p> <p>The Council has failed to consider the implications of the emerging and planned job growth within the EZ’s for the scale of housing provision required within the Borough. However, it would likely result in an increased level of housing need, justifying an increase in the 415 dpa requirement, instead of the decrease proposed by the Partial Review.</p>

Respondent	Text of Representations
Lichfields for Taylor Wimpey	<p>National Planning Policy</p> <p>With regard to housing requirements, the Framework states that to determine the minimum number of homes needed in an area, strategic policies should be informed by a Local Housing Need [LHN] assessment. The Framework is clear that the standard methodology is the default approach for calculating local housing need unless there are “exceptional circumstances” which could justify an alternative approach which also reflects current and future demographic trends and market signals [§60]. The Planning Practice Guidance [PPG] confirms that 2014-based household projections should be used to set the baseline to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.</p> <p>The Government is clear that the figure derived by the LHN target is intended to be a minimum figure, with justifications to go below this relating to environmental or policy constraints rather than issues over the reliability of the household projections:</p> <p><i>“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.1”</i></p> <p>The PPG makes it clear that there will be circumstances when a higher figure than that generated by the standard method might be considered appropriate.</p> <p>Circumstances which might justify an uplift include:</p> <ul style="list-style-type: none"> • growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); • strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or, • an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. <p>In addition, the PPG also notes:</p> <p><i>“There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests2”.</i></p> <p>The PPG also requires a calculation to be made of the total annual need for affordable housing, as follows:</p>

Respondent	Text of Representations
	<p><i>“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.</i></p> <p><i>The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes³”.</i></p> <p>The reference to uplifting the housing figures to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement, rather than LHN itself. Any new calculation of the housing requirement in the Partial Revision will need to ensure that the above factors are fully considered.</p> <p>Emerging Planning Reforms</p> <p>On 6th August, the Government released a consultation paper on proposed changes to the current Planning System and a White Paper on ‘Planning for the Future’. The central focus of both is on speeding up the planning system and increasing the supply of homes being delivered annually. For example, §6 of the changes to the current planning system document reiterates the Government’s aspiration ‘to create a housing market that is capable of delivering 300,000 homes annually and one million homes over this Parliament’. It also states that cumulatively where adopted local plans are already in place, they only provide for 187,000 homes per annum across England, well shy of the Government’s aspiration.</p> <p>Throughout both Papers there is consistent focus on boosting the supply of homes and ensuring that sufficient land is identified for housing, so that the market is not prevented from delivering the homes that are needed and to prevent the under-delivery of the past from continuing to happen.</p> <p>In the consultation paper, there is a realisation that the current standard method is overly reliant on the household projections which are volatile and can result in artificially low projections in some places which results in overcrowding and concealed households suppressing the numbers. It also realises that household projections ‘cannot in isolation forecast housing need – they project trends forward. Despite this, we have seen many progress arguments that recent reductions in projected growth should lead to less homes being built. This should not be the logical conclusion, as the Office for National Statistics (ONS) has clarified⁴’.</p> <p>With this in mind, we have calculated the housing requirement for Fylde using the proposed new standard method. As set out in Table 1, the housing requirement derived from the new standard method is 488 dwellings per year which is closely aligned to Council’s 3-year average delivery of 472 dwellings per annum. Of the four figures presented in Table 1, the outlier is the requirement derived from the current standard method which the Government is seeking to move away from as it does not achieve the Government’s ambition to boost the supply of housing.</p> <p>Table 1 Fylde Housing Requirement</p>

Respondent	Text of Representations											
		Current Plan Requirement	Average 3 Year Delivery	Current Standard Method	Proposed New Method							
	Fylde	415	472	272	488							
	<p>Although this new standard method is in draft and subject to change following the current consultation period, it indicates a direction of travel which suggests that Fylde’s housing need has been artificially suppressed by the existing standard method. Furthermore, it indicates that utilising this method will not assist in addressing the national housing crisis and meet the Government’s long stated ambition of delivering 300,000 units per annum by mid-2020s.</p> <p>Housing Requirement</p> <p>[Initial section on requirement, see under Policy H1]</p> <p>Notwithstanding the aforementioned, when considering the housing requirement for Fylde as part of this Review, it is important to take a look at the evidence base and methodology which informed the Objectively Assessed Need [OAN] and housing requirement in the Fylde Local Plan originally. The OAN for Fylde and the subsequent housing requirement set out in the adopted Local Plan were informed by the Fylde Coast Strategic Housing Market Assessment [SHMA] and its Addenda. The Fylde Addendum 3 was the most up to date information presented at the Examination of the Plan.</p> <p>Addendum 3 concluded that the OAN for housing was a range of between 410 and 430 dwellings per annum. The Council’s housing requirement set out in Policy DLF1 of 415 dpa is within this range. The OAN range was not based solely on demographic projections, it also took into account future levels of employment growth. Therefore, the economic projections which inform the employment land requirement and the housing requirement in the Plan align.</p>											
Emery Planning for Wainhomes North West Ltd	<p>3. Local Housing Need</p> <p>2.22 The revised housing requirement proposed by the Fylde Local Plan Review is based on the change to housing needs methodology in the 2019 Framework. The current standard method results in the following local housing need for Fylde.</p> <table border="1"> <thead> <tr> <th>2019-2019 household projections per annum</th> <th>Affordability ratio</th> <th>Adjustment factor</th> <th>Minimum annual local housing need</th> </tr> </thead> <tbody> <tr> <td>253.30</td> <td>5.36</td> <td>1.09</td> <td>274.83</td> </tr> </tbody> </table>				2019-2019 household projections per annum	Affordability ratio	Adjustment factor	Minimum annual local housing need	253.30	5.36	1.09	274.83
2019-2019 household projections per annum	Affordability ratio	Adjustment factor	Minimum annual local housing need									
253.30	5.36	1.09	274.83									

Respondent	Text of Representations														
	<p>2.23 It is on this basis that Fylde’s housing requirement is proposed to be revised to a minimum of 275 dwellings per annum.</p> <p>2.24 However, the Government published a revised standard method for calculating local housing need in their ‘Changes to the current planning system’ consultation document, dated August 2020. The new method results in the following local housing need for Fylde.</p> <table border="1" data-bbox="465 323 2128 515"> <thead> <tr> <th data-bbox="465 323 799 443">0.5% of existing housing stock</th> <th data-bbox="799 323 1133 443">2018 household projections</th> <th data-bbox="1133 323 1467 443">Affordability ratio</th> <th data-bbox="1467 323 1800 443">Adjustment factor</th> <th data-bbox="1800 323 2128 443">Minimum annual local housing need</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 443 799 515">199.10</td> <td data-bbox="799 443 1133 515">428</td> <td data-bbox="1133 443 1467 515">5.43</td> <td data-bbox="1467 443 1800 515">1.14</td> <td data-bbox="1800 443 2128 515">487.65</td> </tr> </tbody> </table> <p>2.25 The revised standard method results in a housing requirement for Fylde of 488 dwellings per annum. Whilst still in draft, this is significantly higher than both the minimum requirement proposed (275 dwellings per annum) and the adopted housing requirement (415 dwellings per annum).</p> <p>2.26 With regard to local planning, paragraph 31 of the Framework states that:</p> <p style="padding-left: 40px;"><i>“the preparation and review of all policies should be underpinned by relevant and up-to-date evidence.”</i></p> <p>2.27 Adoption of the revised housing requirement as proposed would be to dismiss the draft methodology which is undoubtedly a crucial piece of relevant and up-to-date evidence. We note that the Inspectors wrote to the LPA on 8th July 2020. It is enclosed as Appendix EP2a. For ease of reference they state:</p> <p style="padding-left: 40px;"><i>“2. Where assessing housing and economic development needs, the PPG advises that “Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.”(Paragraph:016, Reference ID: 2a-016-20150227)</i></p> <p style="padding-left: 40px;"><i>3. On Monday 29June 2020 the ONS published the 2018-based household projections. They represent the latest available information. In response to the data released by the ONS, please can you provide the following information.</i></p> <p style="padding-left: 40px;"><i>4. Firstly, please can you individually, provide an assessment of the objectively assessed need for housing for both Central Bedfordshire and North Hertfordshire based on the most up-to-date household projections. This should include details of how you have arrived at each figure. Secondly, please can you advise whether or not you consider this represents a meaningful change for the purposes of the PPG and provide reasons for your conclusions. If the latest household projections do represent a meaningful change, what are the implications for the housing requirement figures in each Plan?”</i></p> <p>2.28 The LPA’s response (Appendix EP2b) states:</p>					0.5% of existing housing stock	2018 household projections	Affordability ratio	Adjustment factor	Minimum annual local housing need	199.10	428	5.43	1.14	487.65
0.5% of existing housing stock	2018 household projections	Affordability ratio	Adjustment factor	Minimum annual local housing need											
199.10	428	5.43	1.14	487.65											

Respondent	Text of Representations															
	<p data-bbox="562 172 2119 272"><i>“(i)The Council’s response is set out in the enclosed note(Note 1)which has been prepared for the Council by Opinion Research Services(ORS),including how the figure has been arrived at. In summary, based on the latest up to date 2018 household projections, the change to the Council’s OAN is less than 1% and therefore not material and does not represent a “meaningful change”.</i></p> <p data-bbox="465 296 2125 432">2.29 In the case of Fylde, the 2014 based projections estimated an increase of 2,499 new households between 2020 and 2030, whereas the 2018 based projections estimate an increase of 4,280 households. This is a meaningful and significant change and one which requires the Partial Review to address. If it does not, then the proposed housing requirement in the Partial Review is in contravention of the Framework and PPG.</p> <p data-bbox="465 456 2125 667">2.30 Further, paragraph 33 of the Framework states that development plans are likely to require earlier review than the statutory minimum where “local housing need is expected to change significantly in the near future.” To progress the Partial Review with a housing requirement based on the current standard method would be to act prematurely given the proposed revisions to the standard method and the resulting implications for Fylde’s housing need. To adopt the Schedule of Revisions now would be to do so on the basis that the Plan would likely require an immediate review. This would be contrary to the aims of the Framework to plan positively and anticipate long-term strategic requirements (paragraphs 16b and 22).</p> <p data-bbox="465 691 2089 751">2.31 As stated in the ‘Background’ section above, the Schedule of Revisions states that the objective of the Plan Review is to ensure that any unmet need is met within the Fylde Coast Housing Market Area (HMA).</p> <p data-bbox="465 775 2125 836">2.32 It is unclear how this objective could be achieved on the basis of a housing requirement that would be almost immediately out of date upon adoption.</p> <p data-bbox="465 860 1912 890">2.33 The table below shows the local housing need for the HMA based on the current and draft revised standard method.</p> <table border="1" data-bbox="465 911 2125 1289"> <thead> <tr> <th data-bbox="472 916 1021 1018">Fylde Coast Housing Market Area Authorities</th> <th data-bbox="1021 916 1574 1018">Annual Local Housing Need based on current standard method</th> <th data-bbox="1574 916 2119 1018">Annual Local Housing Need based on draft revised methodology</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 1018 1021 1086">Fylde</td> <td data-bbox="1021 1018 1574 1086">275</td> <td data-bbox="1574 1018 2119 1086">488</td> </tr> <tr> <td data-bbox="472 1086 1021 1155">Wyre</td> <td data-bbox="1021 1086 1574 1155">308</td> <td data-bbox="1574 1086 2119 1155">383</td> </tr> <tr> <td data-bbox="472 1155 1021 1224">Blackpool</td> <td data-bbox="1021 1155 1574 1224">114</td> <td data-bbox="1574 1155 2119 1224">303</td> </tr> <tr> <td data-bbox="472 1224 1021 1289">HMA total annual housing need</td> <td data-bbox="1021 1224 1574 1289">697</td> <td data-bbox="1574 1224 2119 1289">1,174</td> </tr> </tbody> </table>	Fylde Coast Housing Market Area Authorities	Annual Local Housing Need based on current standard method	Annual Local Housing Need based on draft revised methodology	Fylde	275	488	Wyre	308	383	Blackpool	114	303	HMA total annual housing need	697	1,174
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Respondent	Text of Representations
	<p>2.34 As demonstrated above, the draft revised methodology results in a significantly higher housing requirement for the HMA. The Council cannot expect to ensure that the needs of the HMA are met through a plan review which disregards the most up-to-date evidence of housing need in favour of a lower housing requirement.</p> <p>2.35 Given the ongoing consultation on the standard method, we consider that it is premature for Fylde Council to seek to revise its housing requirement at this stage. An effective and justified strategy would be to await the outcome of the Government's draft revised methodology for calculating local housing need, to ensure that the plan is effective in its delivery of housing for Fylde and the wider HMA. The LPA would then be entitled under Paragraph ID: 61-062-20190315 of the PPG as the Fylde Local Plan was adopted prior to the standard method being implemented, on the basis of a number that is significantly below (415 dwellings) the number generated using the standard method (488 dwellings) on the basis the draft method is adopted. However, that must also be done in co-operation with both Wyre and Blackpool.</p>
Gladman Developments	<p>4.3 Housing Requirement (Paragraphs 9.11 - 9.19 & Policy HI)</p> <p>4.3.1 The proposed amendments to Policy HI and supporting paragraphs 9.11 -9.19 detail the Council's intention to change its Local Plan housing target to a range of 275-415 dpa.It is intended that the lower of these two figures would provide the minimum housing target to be delivered in the borough from the current year (2020), whilst the upper figure would allow still allow for the delivery of existing sites that benefit from an allocation in the FLP32, and help to meet unmet needs from neighbouring authority areas.</p> <p>4.3.2 Further justification for the Council's amended housing target is contained within the authority's March 2020 Housing Needs and Requirement Background Paper. This describes how the figure of 275 dpa is based on the current Government Standard Method, when utilising the 2014-based household projections and the 2018 median workplace-based affordability ratios.</p> <p>4.3.3 Having considered the Council's evidence base, Gladman consider this revised housing target to be arbitrarily low and at odds with the national imperative to significantly boost the supply of housing.</p> <p>4.3.4 Whilst Gladman note that the Council's proposed housing target of 275 dpa has been derived from the current Standard Method, this is the minimum level of housing that the authority would need to accommodate to fulfil the requirements of national planning policy, and is considerably less than the adopted housing requirement of 415 dpa contained within the Council's current Local Plan (Policy HI).</p> <p>4.3.5 In paragraphs 2.14 - 2.16 of the March 2020 Housing Needs and Requirement Background Paper, the Council explore whether there would be any factors to justify a higher local housing need figure in accordance with PPG ID: 2a-010. In this respect, paragraphs 2.14 - 2.16 Background Paper seek to argue that there are no grounds for deviating from the Standard Method or increasing the Council's housing needs above 275 dpa.</p>

Respondent	Text of Representations
	<p>4.3.6 However, Gladman take issue with the reasoning that has been provided for reaching this conclusion. In the first instance, the affordability ratio element of the current Standard Method largely replaces the market signals uplift contained within previous guidance on assessing a Council's objectively assessed housing needs, and does not remove the ability or need to plan for a higher level of housing where this would support economic growth proposals.</p> <p>4.3.7 In this respect, the Background Paper reports how the baseline demographic target that underpins the Council's adopted housing target of 415 dpa was 253 dpa, and very similar to the 256 dpa figure that now underpins the Council's Standard Method calculation. However, as detailed in the Fylde Coast SHMA: Fylde Addendum 3 (May 2017), an important factor in increasing this baseline demographic figure to 415 dpa was the need to plan for additional job growth, yet no consideration appears to have been given to issue when advancing the authority's revised housing target.</p> <p>4.3.8 The PPG makes clear that it may be appropriate to increase an authority's local housing need figure where this would help to support local growth strategies, or where previous assessments of housing need (such as those contained in a SHMA) are significantly greater than the Standard Method. In this regard, Gladman believe that the Council should not be seeking to deviate from the evidence base that underpinned its current adopted housing target unless it has compelling evidence to do so.</p> <p>4.3.9 With this in mind, Gladman further note that under the Government's proposed revisions to the Standard Method, Fylde would be required to plan for a minimum of 488 dpa, before taking into account any factors that could suggest the need to plan for a higher level of housing in the borough. We are also aware that housing completions in the authority totalled 463.490 and 634 dwellings per year in 2017/18, 2018/19 and 2019/20 respectively, which also supports the need to plan for more than the minimum 275 dwelling per year requirement that the authority are now seeking to adopt as in indication of actual housing demand and need in the borough.</p> <p>4.3.10 Gladman are therefore concerned that the Council's attempt to reduce their housing target is inconsistent with the authority's previous economic aspirations and will only serve to unjustifiably frustrate and prevent the delivery of much needed housing within the borough. It is also questionable why the Council are now seeking to advance such a change in housing target, having already sought to identify sufficient sites to meet their higher adopted housing requirement as part of the authority's adopted FLP32 proposals.</p> <p>4.3.11 For the above reasons, we therefore believe that there are no grounds for departing from or amending the authority's current adopted housing target as part of the Partial Review process. Rather, we believe that the Council should now be looking to allocate additional sites, over and above those allocated in the existing Local Plan, and plan for a higher level of housing, to ensure the Council's strategy can respond to any unmet needs arising from neighbouring authorities, and any increase in Fylde's own housing needs.</p>

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Emery Planning for Hollins Strategic Land	<p data-bbox="450 188 734 220">3. Local Housing Need</p> <p data-bbox="450 240 2096 308">2.21 The revised housing requirement proposed by the Fylde Local Plan Review is based on the change to housing needs methodology in the 2019 Framework. The current standard method results in the following local housing need for Fylde.</p> <table border="1" data-bbox="465 323 2130 515"> <thead> <tr> <th data-bbox="465 323 884 443">2019-2019 household projections per annum</th> <th data-bbox="884 323 1296 443">Affordability ratio</th> <th data-bbox="1296 323 1713 443">Adjustment factor</th> <th data-bbox="1713 323 2130 443">Minimum annual local housing need</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 443 884 515">253.30</td> <td data-bbox="884 443 1296 515">5.36</td> <td data-bbox="1296 443 1713 515">1.09</td> <td data-bbox="1713 443 2130 515">274.83</td> </tr> </tbody> </table> <p data-bbox="450 536 1946 568">2.22 It is on this basis that Fylde’s housing requirement is proposed to be revised to a minimum of 275 dwellings per annum.</p> <p data-bbox="450 588 2078 655">2.23 However, the Government published a revised standard method for calculating local housing need in their ‘Changes to the current planning system’ consultation document, dated August 2020. The new method results in the following local housing need for Fylde.</p> <table border="1" data-bbox="465 671 2130 863"> <thead> <tr> <th data-bbox="465 671 799 791">0.5% of existing housing stock</th> <th data-bbox="799 671 1131 791">2018 household projections</th> <th data-bbox="1131 671 1462 791">Affordability ratio</th> <th data-bbox="1462 671 1794 791">Adjustment factor</th> <th data-bbox="1794 671 2130 791">Minimum annual local housing need</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 791 799 863">199.10</td> <td data-bbox="799 791 1131 863">428</td> <td data-bbox="1131 791 1462 863">5.43</td> <td data-bbox="1462 791 1794 863">1.14</td> <td data-bbox="1794 791 2130 863">487.65</td> </tr> </tbody> </table> <p data-bbox="450 884 2107 986">2.24 The revised standard method results in a housing requirement for Fylde of 488 dwellings per annum. Whilst still in draft, this is significantly higher than both the minimum requirement proposed (275 dwellings per annum) and the adopted housing requirement (415 dwellings per annum).</p> <p data-bbox="450 1007 1406 1038">2.25 With regard to local planning, paragraph 31 of the Framework states that:</p> <p data-bbox="562 1059 1794 1091"><i>“the preparation and review of all policies should be underpinned by relevant and up-to-date evidence.”</i></p> <p data-bbox="450 1112 2119 1214">2.26 Adoption of the revised housing requirement as proposed would be to dismiss the draft methodology which is undoubtedly a crucial piece of relevant and up-to-date evidence. We note that the Inspectors wrote to the LPA on 8th July 2020. It is enclosed as Appendix EP2a. For ease of reference they state:</p> <p data-bbox="450 1235 2130 1374">“2. Where assessing housing and economic development needs, the PPG advises that “Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.”(Paragraph:016, Reference ID: 2a-016-20150227)</p>	2019-2019 household projections per annum	Affordability ratio	Adjustment factor	Minimum annual local housing need	253.30	5.36	1.09	274.83	0.5% of existing housing stock	2018 household projections	Affordability ratio	Adjustment factor	Minimum annual local housing need	199.10	428	5.43	1.14	487.65
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	<p>3. On Monday 29 June 2020 the ONS published the 2018-based household projections. They represent the latest available information. In response to the data released by the ONS, please can you provide the following information.</p> <p>4. Firstly, please can you individually, provide an assessment of the objectively assessed need for housing for both Central Bedfordshire and North Hertfordshire based on the most up-to-date household projections. This should include details of how you have arrived at each figure. Secondly, please can you advise whether or not you consider this represents a meaningful change for the purposes of the PPG and provide reasons for your conclusions. If the latest household projections do represent a meaningful change, what are the implications for the housing requirement figures in each Plan?"</p> <p>2.27 The LPA's response (Appendix EP2b) states:</p> <p>"(i)The Council's response is set out in the enclosed note(Note 1)which has been prepared for the Council by Opinion Research Services(ORS),including how the figure has been arrived at. In summary, based on the latest up to date 2018 household projections, the change to the Council's OAN is less than 1% and therefore not material and does not represent a "meaningful change".</p> <p>2.28 In the case of Fylde, the 2014 based projections estimated an increase of 2,499 new households between 2020 and 2030, whereas the 2018 based projections estimate an increase of 4,280 households. This is a meaningful and significant change and one which requires the Partial Review to address. If it does not, then the proposed housing requirement in the Partial Review is in contravention of the Framework and PPG.</p> <p>2.29 Further, paragraph 33 of the Framework states that development plans are likely to require earlier review than the statutory minimum where "local housing need is expected to change significantly in the near future." To progress the Partial Review with a housing requirement based on the current standard method would be to act prematurely given the proposed revisions to the standard method and the resulting implications for Fylde's housing need. To adopt the Schedule of Revisions now would be to do so on the basis that the Plan would likely require an immediate review. This would be contrary to the aims of the Framework to plan positively and anticipate long-term strategic requirements (paragraphs 16b and 22).</p> <p>2.30 As stated in the 'Background' section above, the Schedule of Revisions states that the objective of the Plan Review is to ensure that any unmet need is met within the Fylde Coast Housing Market Area (HMA).</p> <p>2.31 It is unclear how this objective could be achieved on the basis of a housing requirement that would be almost immediately out of date upon adoption.</p> <p>2.32 The table below shows the local housing need for the HMA based on the current and draft revised standard method.</p>

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	Fylde Coast Housing Market Area Authorities	Annual Local Housing Need based on current standard method	Annual Local Housing Need based on draft revised methodology
	Fylde	275	488
	Wyre	308	383
	Blackpool	114	303
	HMA total annual housing need	697	1,174
<p>2.33 As demonstrated above, the draft revised methodology results in a significantly higher housing requirement for the HMA. The Council cannot expect to ensure that the needs of the HMA are met through a plan review which disregards the most up-to-date evidence of housing need in favour of a lower housing requirement. This is particularly the case when the draft Standard Method is a key part of the Planning White Paper, which states:</p> <p><i>“The white paper proposes to retain the Housing Delivery Test and the standard method, which is also included in the concurrent consultation – discussed later – about amending the current planning system. The standard method would be a means of distributing the national housebuilding target of 300, 000 new homes a year and would make LPAs responsible for allocating land suitable for housing to meet the requirement, perhaps through densification or better use of brownfield land.”</i></p> <p>2.34 Housebuilding is a key part of the Government’s policy. The White Paper states:</p> <p><i>“One of the white paper’s aims is to support SME builders and developers, who will (the Government says) be key players in economic recovery following the pandemic.</i></p> <p>The press release accompanying the white paper argued that its proposals could provide a “major boost” to SME builders:</p> <p><i>The changes will be a major boost to SME builders currently cut off by the planning process. They will be key players in getting the country building on the scale needed to drive our economic recovery, while leading housebuilding that is beautiful and builds on local heritage and character.</i></p> <p>(...)</p> <p><i>Recent studies show smaller firms feel the complexities of the planning process and its associated risks, delays and costs are the key challenges they face in homebuilding.</i></p>			

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	<p>Planning for the Future makes several references to the role and the needs of the SME sector. It suggests (for example) that the new Infrastructure Levy would reduce cashflow difficulties for SME developers:</p> <p><i>4.11. As a value-based charge across all use classes, we believe it would be both more effective at capturing increases in value and would be more sensitive to economic downturns. It would reduce risk for developers, and would reduce cashflow difficulties, particularly for SME developers.”</i></p> <p>2.35 Housebuilding is therefore a key sector and meeting the homes of those in need is a priority. The Partial Review is contrary to both those aims.</p> <p>2.36 Given the ongoing consultation on the standard method, we consider that it is premature for Fylde Council to seek to revise its housing requirement at this stage. An effective and justified strategy would be to await the outcome of the Government’s draft revised methodology for calculating local housing need, to ensure that the plan is effective in its delivery of housing for Fylde and the wider HMA. The LPA would then be entitled under Paragraph ID: 61-062-20190315 of the PPG as the Fylde Local Plan was adopted prior to the standard method being implemented, on the basis of a number that is significantly below (415 dwellings) the number generated using the standard method (488 dwellings) on the basis the draft method is adopted. However, that must also be done in co-operation with both Wyre and Blackpool.</p>
Pegasus Group for Hallam Land Management Ltd	<p>5.3 As such, the Fylde consultation documents represent the most up to date evidence on this matter most notably the Housing Needs and Requirement Background Paper March 2020 (EDPR04).</p> <p>Fylde’s Proposed Housing Requirement</p> <p>5.4 In short, section 3 of this paper asserts that the current standard method figure is 275 dpa and that it represents the most appropriate housing need figure for Fylde going forward, rather than the adopted figure of 415 dpa, with no exceptional circumstances to support any uplift to this.</p> <p>5.5 This is justified on the basis that the standard method has a similar basis to the adopted requirement, which comes from the 2014 Fylde Coast SHMA with the demographic starting point being largely the same (256 dpa in the SHMA Addendum 3 and 253 in the standard method), whilst the uplifts, to account for in-migration to support job growth in the adopted requirement vs an affordability uplift in the standard method, address the same consideration (i.e. demand/ scarcity of dwellings).</p> <p>5.6 On this basis they propose to apply the standard method figure for the remainder of the plan period. As such they now put their housing requirement forward as a range in Policy DLF1, with the higher end reflecting the adopted requirement of 415 dpa and the lower end based on the reduced standard method figure of 275 from 2019/20 onwards. This generates a total target range of 6,895 – 8,715 dwellings. They have also sought to remove specific distribution targets from strategic and non-strategic sites and just leave these as percentage figures (90% and 10% respectively).</p>

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	<p>5.7 In terms of the implications on the wider Fylde Coast HMA, and potential unmet need in Wyre, they propose the same approach, using the standard method target (which for Wyre drops from 460 dpa in the adopted plan to 308 dpa and for Blackpool from 280 dpa to 114 dpa). They again argue that there are no exceptional circumstances to depart from this, again using the rationale that the standard method has a similar basis to the adopted requirements from the 2014 Fylde Coast SHMA (all 3 authorities used were subject to the same approach given they are all in one HMA).</p> <p>5.8 This leads to a reduction in annual need across the Fylde Coast from 1,155 dpa to 697 dpa, a drop of 40%.</p> <p>5.9 On this basis Fylde argue that there is no longer any unmet need in Wyre (or the wider HMA) as this was based on an OAN requirement of 479 dpa, and therefore that there is no need for Fylde or Wyre to allocate any additional sites. Instead Fylde propose to soften their requirement by introducing a range as set out above.</p> <p>Proposed Revisions to Standard Methodology</p> <p>5.10 As noted in section 3, the government recently launched a consultation on changes to the standard method, which introduces an element of growth based on existing stock, and increased affordability uplifts, which leads to significant increases in several local authorities, including Fylde, where the indicative figure is 488 dpa, an increase of 77% from the current standard method (and 18% from the adopted plan figure).</p> <p>Figure 5.1 – Fylde Coast Housing Requirements</p> <table border="1" data-bbox="465 804 2130 1295"> <thead> <tr> <th>LPA</th> <th>Adopted Requirement</th> <th>Current Standard Method suggested in Fylde Draft SOCG (SDPR05)</th> <th>Current Standard Method 2020-30 (2014 HHP / 2019 Aff Rates)</th> <th>Current Standard Method 2020-30 (2018 HHP / 2019 Aff Rates)</th> <th>Government's Proposed Changes (0.5% stock increase + affordable uplifts)</th> </tr> </thead> <tbody> <tr> <td>Blackpool</td> <td>280</td> <td>114</td> <td>121</td> <td>40</td> <td>303</td> </tr> <tr> <td>Fylde</td> <td>415</td> <td>275</td> <td>272</td> <td>466</td> <td>488</td> </tr> <tr> <td>Wyre</td> <td>460</td> <td>308</td> <td>296</td> <td>430</td> <td>383</td> </tr> <tr> <td>Fylde Coast HMA Total</td> <td>1,155</td> <td>697</td> <td>689</td> <td>936</td> <td>1,174</td> </tr> </tbody> </table> <p>5.11 It also generates a total need figure of 1,174 dpa across the Fylde Coast which is 68% higher than the current figure claimed by the Council (697 dpa) and marginally higher (1.6%) than the total adopted requirement of the Fylde Coast.</p>	LPA	Adopted Requirement	Current Standard Method suggested in Fylde Draft SOCG (SDPR05)	Current Standard Method 2020-30 (2014 HHP / 2019 Aff Rates)	Current Standard Method 2020-30 (2018 HHP / 2019 Aff Rates)	Government's Proposed Changes (0.5% stock increase + affordable uplifts)	Blackpool	280	114	121	40	303	Fylde	415	275	272	466	488	Wyre	460	308	296	430	383	Fylde Coast HMA Total	1,155	697	689	936	1,174
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	<p>5.12 Now, it is acknowledged that this new method is yet to be adopted and may be subject to some change; however it is highly unlikely to reduce given it seeks to meet the government’s national target of 300,000 homes and is also deliberately seeking to boost northern authorities to correct historic imbalances, so could well rise further. In addition, it could come into force relatively quickly after the consultation period (which closes on 1st October), as it simply requires an update to the PPG, rather than any formal legislative change.</p> <p>5.13 Finally, it is worth noting that even under the current methodology, the latest 2018 household projections and 2019 affordability ratios generates a requirement of 466 dpa, showing that underlying need in Fylde is increasing anyway, and that the proposed 275 dpa figure is far too low.</p> <p>5.14 Accordingly, it is our strong view that the Council need to plan for a figure of at least 488 dpa which will require significant additional allocations, and may also need to reconsider unmet need within Wyre and potentially Blackpool with their figures rising as well.</p> <p>5.15 Even under the current standard method regime, there are exceptional circumstances that would support an elevated housing target above the 275 dpa.</p> <p>5.16 Paragraph 2a-010-20190220 of the PPG sets out the circumstances when it might be appropriate to plan for a higher housing need than the standard method indicates, including where there are growth strategies for the area, strategic infrastructure improvements, where an authority has agreed to take on unmet need from neighbouring authorities, or where previous levels of housing delivery or assessments of need are significantly greater than the standard method. We address each of these in turn below.</p> <p>Growth Strategies & Strategic Infrastructure Improvements</p> <p>5.17 As noted in section 2, Warton is one of four designated Enterprise Zones which form part of the Lancashire Advanced Manufacturing and Energy Cluster (LAMEC), which is the largest number of EZs to be awarded to a single LEP area. This investment has been principally delivered through the Lancashire Growth Deal (2014), which has provided £320m to the Lancashire LEP to support economic growth in the area. The Growth Deal is helping to generate up to 11,000 new jobs, create 3,900 new homes and attract £1.2 billion of additional public and private investment for Lancashire; building on key economic assets including the EZs, universities and colleges, the Preston, South Ribble and Lancashire City Deal and high-value business clusters. There is also a £20m Growing Places investment fund (run by the Lancashire Enterprise Partnership), to support infrastructure, commercial and housing development across Lancashire</p> <p>5.18 In respect of strategic infrastructure, the £200m Preston Western Distributor Road is under construction as part of the Lancashire City Deal, which has a direct impact on Warton by improving access to the EZ and reducing pressure on the local road network.</p> <p>5.19 Accordingly, this clearly demonstrates that there are significant and ambitious growth strategies and infrastructure improvements in this location that could support an elevated level of housing growth to that set out in the current standard methodology.</p> <p>Unmet need in adjacent authorities</p> <p>5.20 This entire Plan Review is based around potential unmet need in Wyre based on the current adopted plan figures. The Council consider this is no longer an issue based on significantly reduced requirements in Fylde and Wyre under the current standard method;</p>

Respondent	Text of Representations																																										
	<p>however the government’s emerging method sees the requirement increase beyond adopted levels across the 3 Fylde Coast authorities, suggesting that there will be unmet need to deal with, potentially in Wyre and in Blackpool, where there are known to be land constraints.</p> <p>Previous delivery</p> <p>5.21 Figure 5.1 below sets out housing completions in Fylde over the last 5 years (2015/16 and 2019/20). This shows that annual completions have significantly exceeded the current standard method figure by a total of 980 dwellings across the 5 years (and the adopted target of 415 dpa by 280 across the 5 years), indicating the actual need far outstrips the standard method figure.</p> <p>Figure 5.2 – Housing Delivery in Fylde 2015-2020</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Completions</th> <th>Adopted Requirement</th> <th>Delivery against adopted Requirement</th> <th>Current Standard Method</th> <th>Delivery against Requirement</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>315</td> <td>415</td> <td>-100</td> <td>275</td> <td>40</td> </tr> <tr> <td>2016/17</td> <td>453</td> <td>415</td> <td>38</td> <td>275</td> <td>178</td> </tr> <tr> <td>2017/18</td> <td>463</td> <td>415</td> <td>48</td> <td>275</td> <td>188</td> </tr> <tr> <td>2018/19</td> <td>490</td> <td>415</td> <td>75</td> <td>275</td> <td>215</td> </tr> <tr> <td>2019/20</td> <td>634</td> <td>415</td> <td>219</td> <td>275</td> <td>359</td> </tr> <tr> <td>TOTAL</td> <td>2,040</td> <td>1,660</td> <td>280</td> <td>1,375</td> <td>980</td> </tr> </tbody> </table> <p>5.22 It is also worth noting that the current plan wasn’t adopted until October 2018, (3.5 years into that 5 year period) meaning that much of this delivery was occurring before this target was adopted demonstrating a latent demand.</p> <p>5.23 This is another indicator that strongly suggests that the proposed standard method figure of 275 dpa is too low and should be increased.</p> <p>5.24 Overall, it is clear from the analysis in this section that the Council should consider adopting the revised standard method figure of 488 dpa going forward, to save this being imposed in the coming months anyway; particularly given that it is in line with current delivery rates (with the last 2 years exceeding 488 per year), whilst the other indicators detailed in the PPG all support an increase from the current standard method figure.</p>	Year	Completions	Adopted Requirement	Delivery against adopted Requirement	Current Standard Method	Delivery against Requirement	2015/16	315	415	-100	275	40	2016/17	453	415	38	275	178	2017/18	463	415	48	275	188	2018/19	490	415	75	275	215	2019/20	634	415	219	275	359	TOTAL	2,040	1,660	280	1,375	980
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Respondent	Text of Representations
	5.25 This is likely to require significant additional allocations within the Fylde Local Plan Review, to meet Fylde's own needs as well as those of Wyre and Blackpool.
Paragraph 9.14: housing requirement	
	Representations that could be considered related to this paragraph have been included in the section for Policy H1.
Paragraph 9.16: plan period requirement	
	Representations that could be considered related to this paragraph have been included in the section for Policy H1.
Paragraph 9.17: residual requirement	
Bryning-with-Warton Parish Council	<p>Chapter 9 - 9.17 (Page 36)</p> <p>Policy H1 c) Adoption of 'Liverpool Method'</p> <p>The Parish Council has supported this method of calculation from the outset and had it been adopted sooner Warton may not have suffered such 'over development' in recent years!</p>
Savills for Fylde Coast Care Village Ltd	<p>In relation to housing requirements, the Partial Review of the Local Plan (paragraph 9.17) states that:</p> <p><i>'1,538 dwellings have been completed in Fylde from 2011-2017, an average of 256 dwellings per annum. When this figure is subtracted from the overall plan period requirement of 6,895-8,715, it gives a residual requirement of 5,357-7,177 dwellings to be completed from 2017 to 2032. This figure (5,357-7,177) includes the shortfall which has accrued during the early years of the plan when large sites were in the planning process. This equates to 357-479 dwellings per annum for the remaining years of the plan period. This is the 'Liverpool' method, for the purpose of calculating the 5 year housing land supply and is necessary in order to provide the most effective strategy to facilitate the delivery of housing during the plan period.'</i></p> <p>The reason for the change is confirmed as follows: <i>'To accord with the requirements of NPPF 2019 paragraphs 60 and 65. Housing numbers edited due to revised housing requirement figure resulting from change to housing needs methodology in NPPF 2019.'</i></p>

Respondent	Text of Representations
	<p>We broadly agree with the revised housing requirement. However, the Council should focus on the higher figures to ensure that housing needs are met.</p> <p>On 6 August 2020 the Planning for the Future White Paper was published for consultation until 29 October, which aims to reform the planning system to streamline the planning process and accelerate delivery of new homes. It sets out a series of reforms to the planning system announced in recent months as part of the Government’s drive to ‘Build Build Build.’ Whilst still in its early stages, it proposes long-term structural changes to the planning system the seek to encourage the delivery of new homes. There is a clear emphasis on the need to deliver new homes.</p> <p>The consultation paper ‘Changes to the current planning system’ proposes a revised Standard Method for calculating Local Housing Need (LHN) that will remain the starting point for the calculation of the Local Plan housing requirement and should result in the country as a whole delivering the target of at least 300,000 homes a year. From an initial review, the revised Standard Method set out in the White Paper shows an increase in housing requirement for Fylde, although this will be subject to further detailed review. With this in mind, the revised Standard Method indicates that the Council should certainly retain the requirement identified in the Partial Review of the Local Plan, as a minimum.</p>
Paragraph 9.19: delivery	
	No representations received in relation to this section
Policy H1	
Story Homes	<p>Similarly, to the above comments on the amendments to Policy DLF1, Story Homes does not consider it appropriate to include a range with regards to the annual net housing requirement. Much like the overall housing requirement, the use of a range suggests both a minimum level of necessary development but also a ceiling limit. This is not conducive to a strong growth area, as suggested in the Vision of the Local Plan, nor does it align with the intentions of central Government to deliver 300,000 new homes a year.</p> <p>The addition of the housing requirement range indicates that Wyre have committed to fully meeting their unmet housing need, however Wyre Council are yet to undertake an early review of their Local Plan where this shortfall would be addressed. Wyre Council have undertaken a scoping exercise for the early review of their Local Plan, however no more definitive actions have been taken to ensure delivery of the unmet need. It is therefore concerning to see Fylde Council assume this shortfall is accounted for either through the imminent Wyre Local Plan review or through a recalculation of the Housing Requirement using emerging methodology. Story Homes invite Fylde Council to reconsider their approach and look at alternative routes to delivering this unmet housing need.</p>

Respondent	Text of Representations
Turley for Strategic Land Group	<p>Rather, it proposes that Policy H1 is modified such that the housing requirement for Fylde is expressed as a range of 275-415 dwellings per annum, the bottom end of the range being consistent with the SM figure and the top end of the range remaining as the identified OAN figure. The Housing Needs and Requirement Background Paper (March 2020) published alongside the Partial Review confirms that the Council intends to use the bottom end of the range, i.e. the SM figure, for the purpose of assessing the Borough’s 5-year housing land supply (5-YHLS) position.</p> <p>SLG’s comments in this respect are as follows:</p> <p>The use of the standard method figure as the housing requirement is unjustified</p> <p>[goes on to consider housing need: see under paragraph 9.13]</p> <p>The Council has presented no evidence alongside the Partial Review to justify the adoption of a housing requirement figure which is in line with the demographic baseline, thereby removing the uplift that was established by the 415 dpa requirement just two years ago. Whilst it is noted that the Partial Review does not propose to deallocate any residential development land, the use of the SM figure as the bottom end of the requirement range – for the purposes of assessing the Borough’s 5-YHLS position – could frustrate the delivery of allocations and other suitable housing sites, such that the 415 dpa requirement is not achieved.</p> <p>The NPPF makes clear that achieving sustainable development is the overarching objective of the planning system in England (paragraph 7). It sets out that sustainable development is comprised of social, economic and environmental objectives, and that these are interdependent and must be “...pursued in mutually supportive ways...” (paragraph 8). The identified objectives cannot therefore be delivered in isolation from each other; they must be pursued collectively. Mindful that the baseline SM figure of 272 dpa would not support the Borough’s economic growth, its adoption as (part of) the housing requirement figure would result in an ineffective housing policy which is not aligned with from the economic policies of the FLP32 and would not support their delivery. Rather, it would create a disconnect between the social and economic delivery objectives of the Plan, and would not therefore be consistent with the objective in NPPF to achieve sustainable development via mutually supportive policies. It cannot therefore be considered sustainable or be found sound.</p> <p>This is particularly the case given the emerging growth at the Enterprise Zones.</p> <p>[continues with section on the EZs relating to housing need: see under paragraph 9.13]</p> <p>Conclusion</p> <p>The Council has a responsibility to plan positively for the current and future housing needs of its communities. It is, however, clear that the proposal of the Partial Review to transpose the baseline minimum starting point SM figure into the housing requirement, including for 5-YHLS purposes, is an attempt to reduce the level of housing provision in the Borough. This will result in a housing strategy which does not meet the Borough’s housing needs and does not support its planned economic growth. It will not result in sustainable development. It is considered to be unjustified, ineffective, not positively prepared and inconsistent with national planning policy.</p>

Respondent	Text of Representations
	<p>SLG urges Council to reconsider its approach to the Partial Review, and to properly assess and provide for the full scale of housing needs arising in the Borough and elsewhere in the HMA, including in response to existing and future economic growth.</p>
<p>Lichfields for Taylor Wimpey</p>	<p>Housing Requirement</p> <p>The Council is seeking to update its Plan through a Partial Review to reflect policy changes within the replacement Framework (2019). However, the Partial Review must be considered in the context of the national ambition to boost the supply of housing and help to address the housing crisis. Furthermore, the recently release consultation on the changes to the planning system indicate a direction of travel away from the current standard method. As such, this Partial Review should seek to be ambitious in terms of the housing requirement it is advocating and pre-emptive of the imminent changes to the planning system which are afoot. As the Council is currently delivering on it's housing requirement and has an adequate supply of land, it seems perverse to be advocating for a reduction in the overall supply at a time when the Government wants to boost the supply of housing and 'level up' the economy of England, driving growth north. Furthermore, as highlighted earlier in the policy review section, the standard method provides a 'minimum starting point' and the Council would not be penalised for exceeding the minimum figure.</p> <p>[continues with section on OAN, see under paragraph 9.13]</p> <p>Approach to Backlog</p> <p>During the Examination of the Fylde Local Plan, there was much debate on whether the Liverpool method or the Sedgfield method for calculation the 5-year supply of housing land should be applied. The Inspector in her Report sided with the Council that utilising the Liverpool method was appropriate in this instance (in 2018) due to the 'Plan's spatial strategy and the delivery of the larger strategic sites' [§88]. However, national planning policy is very clear that past under delivery since the base date of the plan should be added to the plan requirements for the next 5 year period (the Sedgfield Approach)5.</p> <p>The original reason for the Inspector diverging from the accepted norm and allowing the use of the Liverpool method for dealing with past under delivery was to allow time for the strategic sites in Fylde to come forward. Sufficient time has now passed to allow these sites to progress and as such, in this Partial Review of the Plan, the Council must also reconsider it's continued use of the 'Liverpool' method for dealing with backlog particularly given that it is at odds with national planning policy. Taylor Wimpey see no reason why the approach to backlog cannot be reconsidered in this Partial Review and also sees no reason why the Sedgfield approach is not applied.</p> <p>Review of Evidence</p> <p>Taylor Wimpey consider that a key element of evidence is missing from that released to underpin the Partial Review of the Fylde Local Plan. The Partial Review of the Plan primarily seeks to reduce the overall housing requirement of Fylde despite the Council's continued ability to deliver higher numbers of housing, maintain a deliverable supply drive economic growth and meet the Government's ambition to boost the supply of housing.</p>

Respondent	Text of Representations
	<p>No evidence has been presented by the Council which assessing the impact that this reduction in the housing requirement would have in particular on the delivery of affordable housing but also on homes suitable for first time buyers, key workers and family homes. The most recent evidence compiled by the Council on affordable housing need is contained within the Fylde Coast SHMA Addendum 1 (November 2014) which concluded that the annual affordable housing requirement was 249 dwellings per annum. Therefore, the annual affordable housing requirement in Fylde is considerable and meeting this need will be adversely affected by the Council’s decision to reduce its annual housing requirement. Conversely, reducing the annual housing requirement could directly affect the affordable housing requirement in the long term due to increased house prices as a result of a shortage of supply. There is also a requirement in national policy to prepare a LHN assessment to inform the new housing requirement and this has not been undertaken.</p> <p>Taylor Wimpey considers that additional evidence is required which explores the impact that reducing the housing requirement in Fylde will have on the delivery of affordable housing as well as family housing and homes suitable for first time buyers and key workers.</p> <p>In terms of the Housing Delivery Test [HDT], the Council has performed very strongly over the past 3 years and achieved 183% in the latest set of results. Over the three monitoring years 2016-2019, the Council delivered 455, 512 and 471 dwellings annually. The delivery in all three of the most recent monitoring years has been in excess of the annual requirement set out in the current Fylde Local Plan.</p> <p>The Council published an Annual Position Statement [APS] in May 2020 which sets out the housing land supply position at the base date of 1st April 2019. This concluded that the Council has a 5.1-year supply of deliverable housing land and the position is confirmed until 31st October 2020 in accordance with §74 of the Framework.</p> <p>In terms of annual supply over the next 7 years (2019-26), the APS anticipates that the Council’s annual housing delivery will be: 888, 576, 409, 430, 369, 711 and 605 respectively. In total, it is anticipated that the Council can deliver 3,988 units over the next 7 years, an annual average of 569 dwellings which is in excess of the Council’s adopted housing requirement and assisting in meeting undersupply since the start of the plan period (2011).</p> <p>This evidence demonstrates that Fylde has the capacity to deliver its existing housing requirement and utilising the early review mechanism, and to suppress its housing requirement is fundamentally at variance with Government ambition.</p> <p>Considerations</p> <p>Taylor Wimpey considers that the Council is seeking to utilise a short window of opportunity to reduce its overall housing requirement without considering the consequences and paying no consideration to the Government’s stated ambition of boosting the supply of housing. It appears that the Council is taking a short-termism approach and not considering the true implications of their decision.</p> <p>Reducing the housing requirement will lead to a number of consequences in the Borough, for example:</p> <ul style="list-style-type: none"> • It will exacerbate the affordability issues in Fylde; • It will lead to unsustainable levels of commuting as the Council continue to pursue an aspirational employment land requirement; • It will exacerbate the already high affordable housing needs of the Borough; and,

Respondent	Text of Representations
	<ul style="list-style-type: none"> • It will depress economic growth and cut job creation through construction in the Borough. <p>Everyone understands that we are in the midst of some very uncertain economic times caused by the Covid-19 pandemic and every local authority should be seeking to drive economic growth over the coming years to reduce the levels of unemployment which may transpire over the coming month. Unnecessarily reducing the housing requirement of an area will directly affect employment levels and inward investment in Fylde. It will also affect potential sources of revenue to the local authority through the New Homes Bonus payment and additional Council Tax revenues will represent a missed opportunity for the Council to assist in securing funds for it's already stretched services.</p> <p>Finally, the Council has successfully delivered high numbers of homes over the past number of years and this has demonstrated that there is a market in Fylde to absorb this rate of delivery. Therefore, it seems perverse for the Local Authority to seek to reduce their housing requirement at this time particularly when the Council has demonstrated through the adoption of their APS that they have a sufficient supply of housing land to meet their existing housing requirement over the next 5 years.</p> <p>Conclusions</p> <p>As set out in our representations in June 2019, Taylor Wimpey is of the opinion that the Council should not use the early review mechanism simply as a means of reducing the overall need for housing in the authority. It is widely accepted that we are in the midst of a national housing crisis and every local authority must play its part in ensuring the Government's objective of delivering at least 300,000 homes per year by mid-2020s is achieved. Furthermore, the Framework is clear [§59] that the Government's objective is to significantly boost the supply of housing across the Country.</p> <p>Taylor Wimpey is of the firm belief that Fylde Council should abandon its intention to undertake this Partial Review of the plan for a number of reasons:</p> <ul style="list-style-type: none"> • There is a clear direction of travel from Government recently to seek to boost the supply of houses; • The proposed standard method would derive a much higher housing requirement figure in Fylde; and • Given the content of the recently released White Paper and the intention to review all Plans again by 2024, the completion of this Partial Review now would represent abortive work and a waste of tax payers money <p>The Council is claiming to be undertaking this Partial Review to meet Wyre's unmet need, but this is not the case. It is not clear at this stage what Wyre Council is going to do and the timings of it's potential Partial Review. As such, the Council needs to align its Partial Review timetable with Wyre or risk a similar situation as last time.</p> <p>The Government has released a consultation document on changes to the planning system which includes a review of the standard method for calculating housing need. When the new methodology is applied to Fylde it derives an annual housing requirement figure of 488 dwellings. This is in excess of the Council's existing adopted housing requirement figure and Taylor Wimpey sees no logical and positive reason why the Council would seek to bring forward a much-reduced housing requirement figure now when the direction of travel</p>

Respondent	Text of Representations
	<p>indicates a new standard method. To progress with a housing requirement figure of 275 dwelling per annum would be the antithesis of positive planning and seeking to boost the supply of housing to address the UK's housing crisis.</p> <p>The economy across the UK is facing an uncertain time as the impacts of the global pandemic and possible issues associated with Brexit come to the fore. It is imperative that the Council seeks to drive economic development in its area by pursuing a realistic housing requirement in line with Government ambitions rather than seeking to suppress growth, exacerbate the housing and affordability crisis and impact the number of local jobs which could be generated through the development of homes.</p>
Home Builders' Federation	<p>Policy H1</p> <p>Proposed policy H1 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons:</p> <p>17. The Council proposed to amend this policy to state 'the Council will provide for and manage the delivery of new housing by setting and applying a housing requirement of 415 net homes per annum for the period 2011 – 2019 and a housing requirement of 275-415 net homes per annum for the period 2019-2032'.</p> <p>18. As has been set out in the response above to Policy DLF1, the HBF do not consider that this amendment is sound. In summary the HBF consider that:</p> <ul style="list-style-type: none"> • the policy is not clearly written and it is not clear how the range would be used in the decision making process; • that the range, and the removal of the word minimum from this version of the policy, would be contrary to the Government's objective to significantly boost the supply of homes; • that the housing need is higher than that provided by the LHN calculated using the standard method, and therefore the policy is not positively prepared or justified; • that there remain issues with the unmet need from Wyre, and therefore the policy is not effective; and • that the plan period is no longer consistent with the NPPF requirements.
Bryning-with-Warton Parish Council	<p>Chapter 9 - 9.17 (Page 36)</p> <p>Policy H1 c) Adoption of 'Liverpool Method'</p> <p>The Parish Council has supported this method of calculation from the outset and had it been adopted sooner Warton may not have suffered such 'over development' in recent years!</p>

Respondent	Text of Representations
Emery Planning for Wainhomes North West Ltd	<p>4. The application of the revised requirement for 5-year supply.</p> <p>2.36 In light of the adopted requirement in Policy H1 and the draft Local Housing Need figure of 488, it is clear that a figure of 275 dwellings is a suppression of actual housing need in the Borough. The application of a requirement of 275 dwellings per annum for calculating 5-year land supply would be a direct conflict with the Framework’s policy to boost housing supply. Paragraph 73 of the Framework states:</p> <p style="padding-left: 40px;"><i>“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies³⁶, or against their local housing need where the strategic policies are more than five years old.”</i></p> <p>2.37 The application of a reduced housing requirement within 5 years of adoption through this Partial Review which has no support in the Framework or the PPG is wholly unjustified. The figure of 415 dwellings per annum must be used for the calculation of the 5 year supply, as that is what the Local Plan allocated land to meet, and if there is a shortfall in achieving that requirement, then unallocated sites must be considered. With the 2018 household projections stating an annual increase of 428 households per annum and the draft Local Housing Need of 488 per annum, then as a minimum the 5-year supply must be calculated on 415 dwellings.</p> <p>2.38 In response to EDPR05 we append (Appendix EP3) our representations to the draft APS which includes our assessment of the sites in the supply. If the Partial Review progresses, then we would update this as part of the Examination.</p> <p>2.39 For these reasons, there is no support in the Framework or PPG for Reason 1 for the Partial Review as being consulted upon.</p>
Gladman Developments	<p>4.3 Housing Requirement (Paragraphs 9.11 - 9.19 & Policy HI)</p> <p>4.3.1 The proposed amendments to Policy HI and supporting paragraphs 9.11 -9.19 detail the Council's intention to change its Local Plan housing target to a range of 275-415 dpa.It is intended that the lower of these two figures would provide the minimum housing target to be delivered in the borough from the current year (2020), whilst the upper figure would allow still allow for the delivery of existing sites that benefit from an allocation in the FLP32, and help to meet unmet needs from neighbouring authority areas.</p> <p>4.3.2 Further justification for the Council's amended housing target is contained within the authority's March 2020 Housing Needs and Requirement Background Paper. This describes how the figure of 275 dpa is based on the current Government Standard Method, when utilising the 2014-based household projections and the 2018 median workplace-based affordability ratios.</p> <p>4.3.3 Having considered the Council's evidence base, Gladman consider this revised housing target to be arbitrarily low and at odds with the national imperative to significantly boost the supply of housing.</p>

Respondent	Text of Representations
	<p>4.3.4 Whilst Gladman note that the Council's proposed housing target of 275 dpa has been derived from the current Standard Method, this is the minimum level of housing that the authority would need to accommodate to fulfil the requirements of national planning policy, and is considerably less than the adopted housing requirement of 415 dpa contained within the Council's current Local Plan (Policy HI).</p> <p>4.3.5 In paragraphs 2.14 - 2.16 of the March 2020 Housing Needs and Requirement Background Paper, the Council explore whether there would be any factors to justify a higher local housing need figure in accordance with PPG ID: 2a-010. In this respect, paragraphs 2.14 - 2.16 Background Paper seek to argue that there are no grounds for deviating from the Standard Method or increasing the Council's housing needs above 275 dpa.</p> <p>4.3.6 However, Gladman take issue with the reasoning that has been provided for reaching this conclusion. In the first instance, the affordability ratio element of the current Standard Method largely replaces the market signals uplift contained within previous guidance on assessing a Council's objectively assessed housing needs, and does not remove the ability or need to plan for a higher level of housing where this would support economic growth proposals.</p> <p>4.3.7 In this respect, the Background Paper reports how the baseline demographic target that underpins the Council's adopted housing target of 415 dpa was 253 dpa, and very similar to the 256 dpa figure that now underpins the Council's Standard Method calculation. However, as detailed in the Fylde Coast SHMA: Fylde Addendum 3 (May 2017), an important factor in increasing this baseline demographic figure to 415 dpa was the need to plan for additional job growth, yet no consideration appears to have been given to issue when advancing the authority's revised housing target.</p> <p>4.3.8 The PPG makes clear that it may be appropriate to increase an authority's local housing need figure where this would help to support local growth strategies, or where previous assessments of housing need (such as those contained in a SHMA) are significantly greater than the Standard Method. In this regard, Gladman believe that the Council should not be seeking to deviate from the evidence base that underpinned its current adopted housing target unless it has compelling evidence to do so.</p> <p>4.3.9 With this in mind, Gladman further note that under the Government's proposed revisions to the Standard Method, Fylde would be required to plan for a minimum of 488 dpa, before taking into account any factors that could suggest the need to plan for a higher level of housing in the borough. We are also aware that housing completions in the authority totalled 463.490 and 634 dwellings per year in 2017/18. 2018/19 and 2019/20 respectively, which also supports the need to plan for more than the minimum 275 dwelling per year requirement that the authority are now seeking to adopt as in indication of actual housing demand and need in the borough.</p> <p>4.3.10 Gladman are therefore concerned that the Council's attempt to reduce their housing target is inconsistent with the authority's previous economic aspirations and will only serve to unjustifiably frustrate and prevent the delivery of much needed housing within the borough. It is also questionable why the Council are now seeking to advance such a change in housing target, having already sought to identify sufficient sites to meet their higher adopted housing requirement as part of the authority's adopted FLP32 proposals.</p> <p>4.3.11 For the above reasons, we therefore believe that there are no grounds for departing from or amending the authority's current adopted housing target as part of the Partial Review process. Rather, we believe that the Council should now be looking to allocate</p>

Respondent	Text of Representations
	<p>additional sites, over and above those allocated in the existing Local Plan, and plan for a higher level of housing, to ensure the Council's strategy can respond to any unmet needs arising from neighbouring authorities, and any increase in Fylde's own housing needs.</p> <p>4.4 Five Year Housing Land Supply</p> <p>4.4.1 Whilst not specifically referenced within the Schedule of Revisions to the Fylde Local Plan to 2032 document, the March 2020 Housing Needs and Requirement Background Paper discusses how the authority's proposed housing target of 275 dpa, or range of 275 - 415 dpa, would affect the Council's five-year housing land supply calculation.</p> <p>4.4.2 In this respect, the Background Paper references the PPG, which states at ID: 68-027 that "Where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the 5 year land supply will be measured against the lower end of the range."</p> <p>4.4.3 For the reasons set out above, Gladman believe that the Council's decision to progress a reduced housing requirement would not be justified, and therefore that the figure of 275 dpa should not be used to calculate the authority's five year housing land supply position. Seeking to monitor the Council's performance against such a low target will only serve to restrict the supply of much needed housing within the authority.</p> <p>4.4.4 The effects of this restraint on housing delivery will be further compounded by the Council's continued reliance on the 'Liverpool' method for addressing any backlog in the authority's housing land supply calculation. As explained by Inspector Baird in the authority's now quashed 15th January 2020 Annual Position Statement Report: <i>"The objective of national planning policy is to "...significantly boost the supply of homes..." and a 5-year HLS is regarded as a minimum position. The shortfall in delivery is not a mathematical exercise, it is real households that require homes now. In this context and given the declining supply of housing land (in Fylde), the continued use of the Liverpool Approach to determine the annual requirement cannot be justified"</i></p> <p>4.4.5 In accordance with PPG ID: 68-031, Gladman therefore believe that the authority should now be looking to address any shortfall via the 'Sedgefield' method, unless there are clear and compelling reasons for continuing to make good any under-supply over the remainder of the Local Plan period. This should be examined through the Partial Review process.</p> <p>4.4.6 Notwithstanding the above comments and our views on the adequacy of the Council's proposed housing target, we also have some concerns with the way in which the Council has assessed the residual housing requirement that is to be met over the remainder of the Local Plan period to 2032.</p> <p>4.4.7 This is discussed further in paragraphs 4.8 of the authority's March 2020 Housing Needs and Requirement Background Paper, which explains how the residual housing requirement from 2017 - 2032 would be 5,357 - 7,177 dwellings, taking account of actual completions between 2011 and 2017.</p>

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	<p>4.4.8 However, given that there have now been three additional years of housing completions within the authority, we would suggest that it would now be sensible to update these figures to reflect the latest position (i.e. as of 1st April 2020). We also submit that the Council should ensure that it is using its baseline housing target (e.g. 415 dpa) for the purposes of any five-year housing land supply calculations, with performance monitored against this target on a rolling annual basis.</p> <p>4.4.9 This was a point raised in our recent representations on the Council's Draft 2020 Annual Position Statement, as the authority's current approach seeks to over-inflate the authority's housing land supply position and incorrectly factors in any undersupply or oversupply against the Council's adopted housing target. We therefore submit that this should be made clear as part of the Partial Review process.</p>
DePol for Concert Living	<p>1.2 The representation specifically relates to the revision to Policy H1, and in particular:</p> <ul style="list-style-type: none"> • The introduction of a housing requirement range of 275-415 net dwellings per annum for the period 2019-2032 (policy H1a) and the alteration of the housing requirement to a range of 6,895 – 8,715 homes (policy H1d); and • The continued use of the 'Liverpool' method for the purpose of calculating the 5 year housing land supply (policy H1c). <p>1.3 For reasons set out in this representation it is considered that these revisions do not meet the test of soundness, as set out in Framework 2019 paragraph 35, which requires development plans to be:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>1.4 For reasons set out in this representation it is considered that the housing requirement stipulated in Policy H1 a) and d) should either remain as per the current adopted policy or should be increased. It is also considered that the reference to the 5YR housing supply being assessed using the "Liverpool" method in Policy H1 c) should be deleted.</p> <p>1.5 Whilst this representation relates to Policy H1, it also affects other associated policies, explanatory paragraphs and performance monitoring indicators in the Local Plan which refer to the housing requirement.</p> <p>2. POLICY H1 HOUSING REQUIREMENT</p> <p>Framework and National Planning Practice Guidance</p>

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	<p>2.1 As highlighted, for the partial review of the Local Plan to pass the test of soundness it must be consistent with national policy and enable the delivery of sustainable development in accordance with the policies in the Framework. It must also be positively prepared, providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.</p> <p>2.2 These representations relate to Local Plan Policy H1, which is a strategic policy setting the housing requirement for the Borough and the following policies of the Framework are therefore particularly relevant.</p> <p>2.3 Framework paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development, which for plan-making means:</p> <ul style="list-style-type: none"> a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: <ul style="list-style-type: none"> i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole <p>2.4 Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing).</p> <p>2.5 Paragraph 59 confirms that a Government objective is to significantly boost the supply of homes and as part of this it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.</p> <p>2.6 Paragraph 65 states that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.</p> <p>2.7 Paragraph 73 requires strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period and requires all plans to consider whether it is appropriate to set out the anticipated rate of development for specific sites. It requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing (5YR supply) against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.</p> <p>2.8 Paragraph 75 states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's</p>

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	<p>housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years.</p> <p>2.9 The importance of ensuring that housing needs are being delivered is demonstrated by the fact that Framework footnote 7 states that for planning applications involving the provision of housing, if the LPA cannot demonstrate a deliverable 5YR housing supply, or where the Housing Delivery Test indicates that the delivery of housing was less than 75% of the housing requirement over the previous three years, the development plan policies which are most important for determining the application are to be considered out-of-date for the purposes of Framework paragraph 11 d). This engages what is commonly referred to as the ‘tilted balance’ in decision-taking, where permission is to be granted unless the application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.</p> <p>2.10 To determine the minimum number of homes needed, Framework paragraph 60 states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance (NPPG), unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure (LHN), any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.</p> <p>2.11 Framework paragraph 212 states that plans may need to be revised to reflect policy changes which the Framework 2019 has made and that this should be progressed as quickly as possible, either through a partial revision or by preparing a new plan. However, paragraph 213 confirms that existing development plan policies should not be considered out-of-date simply because they were adopted or made prior to the publication of Framework 2019. In these instances, due weight should be given to them according to their degree of consistency with the Framework. In this context, it is relevant to note that paragraph 214 provides a transitional period where the policies in the previous 2012 Framework still applied for the purpose of examining development plans, where those plans were submitted on or before 24 January 2019. This is the case for the current adopted Fylde Local Plan, which was considered against the previous 2012 Framework under this transitional arrangement.</p> <p>2.12 NPPG paragraph 062 Reference ID: 61-062-20190315, under the heading ‘How often should a plan or policies be reviewed?’ states that where a review of a Local Plan was undertaken prior to publication of the Framework (27 July 2018) but within the last 5 years, then that plan will continue to constitute the up-to-date plan policies. Framework paragraph 33 and NPPG also state that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years.</p> <p>2.13 Whilst both Framework paragraph 33 and the NPPG state that relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier reviews if local housing need is expected to change significantly in the near future. NPPG Paragraph: 062 Reference ID: 61-062-20190315 adds further clarification by stating that:</p>

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	<p data-bbox="562 172 2107 309"><i>“Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for as quickly as reasonably possible”</i></p> <p data-bbox="465 331 2132 612">2.14 When considering Framework paragraphs 212, 213, 214, 33 and 73, together with NPPG, it is evident that there is no requirement under the terms of the Framework to undertake a review the housing requirement set in strategic Policy H1 at this time. In this respect, whilst the Fylde Local Plan housing requirement was not based on a LHN using the standard method, this was clearly considered acceptable through the Framework transitional arrangement. Furthermore, the policy was adopted less than two years ago and whilst the Framework refers to relevant strategic policies potentially needing a review earlier than five years if the applicable LHN figure has changed significantly, NPPG clarifies that this is when the adopted housing requirement is based on a number that is significantly <u>below</u> the number generated using the standard method. As highlighted later, this is not the case in Fylde as the LHN based on the standard method is lower than the current adopted Local Plan requirement.</p> <p data-bbox="465 635 2119 737">2.15 It is also relevant to note that the standard method is under review and the current proposed amendments, if applied in their current form, would result in a LHN which is not just significantly higher than the LHN based on the current standard method, but is also higher than the current Local Plan housing requirement. This is expanded upon below.</p> <p data-bbox="465 759 680 788">Standard Method</p> <p data-bbox="465 810 2114 986">2.16 As highlighted, the housing requirement set in Policy H1 of the current adopted Local Plan is based on the LPA’s objectively assessed need (OAN), established through the Fylde Coast Strategic Housing Market Assessment (SHMA). This identified the OAN as being between 410-430 dpa, although despite the SHMA recommending that it should be towards the upper end due to support economic growth in the area, the adopted Local Plan requirement is towards the lower end, i.e. 415dpa. This is the Borough’s recently confirmed objectively assessed need.</p> <p data-bbox="465 1008 2128 1110">2.17 The 2008 version of the Framework introduced the standard method as the new means of calculating local housing need (LHN), but whilst this was published prior to the adoption of the Fylde Local Plan, the Plan was examined against the former version of the Framework due to the aforementioned transitional arrangement.</p> <p data-bbox="465 1133 2123 1235">2.18 Framework 2019 now states that to determine the minimum number of homes needed strategic policies should be informed by a LHN assessment conducted using the standard method in Planning Practice Guidance (NPPG). This is unless exceptional circumstances justify an alternative approach.</p> <p data-bbox="465 1257 2024 1321">2.19 The NPPG on housing needs assessments provides local authorities with a guide on how to approach the standard method for assessing LHN and it provides an overview of the formula. In summary, this involves:</p>

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	<p>Step 1: establishing the demographic baseline of household growth. This is based on the 10-year projected annual average growth in the 2014-based national household growth projections using the current year as the starting point.</p> <ul style="list-style-type: none"> Step 2: apply an affordability adjustment on the demographic baseline using the following formula. [repeats formula from PPG] Step 3: consider the application of a cap on any increase and ensure that the figure which arises through the first two steps does not exceed a level which can be delivered. <p>2.20 The LPA's Housing Needs and Requirement Background Paper (HNRBP) refers to the LHN being 275 dpa based on the above methodology.</p> <p>2.21 However, NPPG states under the heading <i>'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?'</i> (paragraph: 010 Reference ID: 2a-010-20190220) that the standard method provides <i>"a minimum starting point"</i> in determining the number of home needed and does not attempt to predict the impact that future Government policies, changing economic circumstances or other factors might have on demographic behaviour. It confirms that there may be circumstances where it is appropriate to consider whether <i>"actual housing need is higher than the standard method indicates"</i>. The NPPG goes on to identify the sort of circumstances where this may be the case and these are considered to apply to Fylde, i.e.</p> <ul style="list-style-type: none"> Situations where increases in housing need are likely to exceed past trends because of growth strategies for the area, such as where funding is in place to promote and facilitate additional growth and where strategic infrastructure improvements are likely to drive an increase in the homes needed. Investment and initiatives such as the Warton Enterprise Zone have the potential to boost the demand for housing within the Fylde, over and above the levels that may be suggested by the Standard Method. Indeed, the evidence base for the authority's recent adopted Local Plan Examination suggested that the LPA's future housing requirement should be set at the upper end of the OAN range of 410-430 dpa to support economic growth in the area. Situations where previous levels of housing delivery in an area are significantly greater than the outcome from the standard method. The LPA's net annual completions over the last 3 years since 2016/17 have been 455 dwellings, 470 dwellings and 490 dwellings. It is noted that completions prior to 2016/17 were lower, but as highlighted later this was in the context of the previous Local Plan being significantly time expired, not having any housing allocations or a development strategy in place to deliver the Borough's housing need, and the Borough being entirely reliant on windfall development but constrained by defined settlement boundaries which had been drawn in a restrictive manner on the basis that new housing was to be strictly regulated. Moreover, the LPA had imposed a housing moratorium and even once lifted continually refused large housing developments, forcing applicants to obtain permission via s.78 appeals. <p>2.22 The NPPG is clear that authorities will need to take the above into account when considering whether it is appropriate to plan for a higher level of need than the standard method suggests. There is a clear steer from NPPG that the standard method figure of 275dpa should only be treated as the minimum starting point and when considering the above factors the housing requirement for Fylde should be</p>

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	<p>increased. To simply treat the minimum starting point as the new housing requirement, despite it being substantially below a recently adopted Local Plan figure and actual annual completions over the last 3 years, contradicts the Government's commitment to significantly boost the supply of housing (paragraph 59) and the requirement to address potential barriers to investment, such as inadequate housing, which is part of the objective to build a strong a competitive economy (paragraph 81c). This is particularly the case given the current Government review of the standard method.</p> <p>2.23 In this respect, in August 2020 the Government published the consultation document 'Changes to the current planning system: Consultation on changes to planning policy and regulations'. Part of the proposed changes relate to the standard method.</p> <p>2.24 The proposals relate to a revised standard method for calculating local housing need which will be used as the basis for plans created prior to any changes outlined in Planning for the Future being introduced. Under the heading 'Boosting Supply' the consultation document refers to the Government aspiration to create a housing market that is capable of delivering 300,000 homes annually, yet Adopted local plans, where they are in place, provide for just 187,000 homes per year across England – <i>"not just significantly below our ambition for 300,000 new homes annually, but also lower than the number of homes delivered last year (241,000)"</i>. It is in this context that the revisions to the standard method are being proposed. Paragraph 10 states that <i>"The overall level of need identified by the standard method therefore needs to be sufficient to ensure that land supply does not become a limiter in achieving national supply aspirations."</i></p> <p>2.25 The consultation document reaffirms that the standard method only provides the starting point for planning for housing and does not establish the housing requirement. It also reaffirms in paragraph 8 that after identifying the minimum number of homes using the standard method, local areas should consider whether local circumstances mean that actual need is higher than that minimum.</p> <p>2.26 Paragraph 13 states that:</p> <p style="padding-left: 40px;"><i>"Household projections, used in the current method, have attracted criticism for their volatility and the way in which they can result in artificially low projections in some places, where overcrowding and concealed households suppress the numbers. Crucially, they cannot in isolation forecast housing need – they project past trends forward. Despite this, we have seen many progress arguments that recent reductions in projected growth should lead to less homes being built. This should not be the logical conclusion, as the Office for National Statistics (ONS) has clarified."</i></p> <p>2.27 Paragraph 14 sets out what the improvements on the revised standard method are designed to achieve, which includes achieving a better distribution of homes where homes are identified in more high-demand areas and in emerging demand areas across the country such as the Northern Powerhouse. This will help avoid issues where unaffordable areas in high demand are planning for low numbers of homes due to past trends of suppressed household formation.</p>

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	<p>2.28 The proposed changes to the standard method are as follows:</p> <ul style="list-style-type: none"> • Stage 1: the baseline would either be the latest projected average annual household growth over a 10-year period based on the latest ONS national household growth projections, or 0.5% of the existing stock in the local authority, whichever is the higher. • Stage 2: the following amended affordability adjustment would be applied: <div style="padding-left: 40px;">[repeats formula from the consultation document]</div> • Stage 3: the former cap has been removed <p>2.29 The implication of this for Fylde is that the minimum LHN based on this revised standard method (SM version 2) would be 488 dpa. This is not just higher than the current SM version 1 (275 dpa) but is also higher than the current Local Plan Policy H1 requirement (415 dpa).</p> <p>Implication of the Proposed Revisions to Policy H1 a) and d)</p> <p>2.30 Policy H1a) of the adopted Local Plan identifies the housing requirement as 415 dpa, which H1d) confirms equates to a minimum of 8,715 homes over the plan period 2011-2032. The amendment to Policy H1 in the partial review is to change the annual requirement post 2019 to a range of 275-415 dpa, equating to a new housing requirement of between 6,895-8,715 dwellings over the plan period.</p> <p>2.31 There are no proposed alterations to the existing housing allocations, no proposed changes to any phasing of the allocations, nor any introduction of new housing allocations either to meet the needs of Fylde, Wyre or any other neighbouring authority. Consequently, the proposed amendments will do nothing to help the Framework objective to boost the supply of homes, but they will:</p> <p>a) Strengthen the LPA’s position with regards to avoiding the Framework paragraph 11d ‘titled balance’, which is a Government measure partly aimed at helping address under delivery of housing, which is clearly evident from footnote 7; and</p> <p>b) Remove the opportunity to allocate additional land in the Local Plan review to meet any needs for Fylde or neighbouring authorities which may arise based on the proposed amendments to the standard method.</p> <p>2.32 With regards to the 5YR supply, PPG paragraph 027 Reference ID: 68-027-20190722 states that where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the 5YR supply will be measured against the lower end of the range. Accordingly, in Fylde the 5YR housing supply would switch from being considered against the current adopted Local Plan requirement of 415dpa to the much lower 275dpa figure, i.e. the bottom of the range which would be introduced as part of the partial review. Under terms of Framework paragraph 73 this would be the case for a period of five years following the adoption of the partial review Local Plan, irrespective of whether the standard method is subsequently amended resulting in a much higher LHN figure. This could result in a scenario where the LPA does not have a deliverable 5YR housing supply based on the current adopted Local Plan requirement and the LHN based on standard method version 2, but is deemed to have a deliverable 5YR supply due to the lower figure in the Local Plan. The housing delivery test would also continue to be measured against the much lower figure of 275 dpa.</p>

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	<p>2.33 With regards to missing the opportunity to allocate land to address housing need, it is relevant to note that if SM version 2 were introduced in its current form and resulted in a LHN of 488 dpa, this would equate to a minimum additional need of 949 homes over the remaining plan period of 2019 to 2032 when compared with the current adopted Policy H1. It is also unknown as to what implication the new SM will have on the housing requirement of neighbouring authorities such as Wyre and Blackpool, who are also currently reviewing their housing requirement. In this respect, whilst the Wyre Local Plan was adopted in February 2019 it did not result in a clear quantification of unmet housing need (to be met elsewhere) and this matter still requires further examination through its own immediate partial review. As such the question of how much housing remains in Wyre is still unanswered. Undertaking a partial review of the Fylde Local Plan at this stage therefore prevents the opportunity to consider whether additional housing land ought to be allocated for housing in the Local Plan should the revised SM indicate a significantly increased LHN. Indeed it makes no logical sense for the LPA to use Framework paragraph 212 and paragraph 1.27 of the current Local Plan and to try and justify a partial review now, rather than waiting to assess the outcome of the standard method review. This is particularly the case given paragraphs 2.11 to 2.16 of this representation.</p> <p>2.34 Whilst the LPA would have the option to undertake another review of the Local Plan in due course to reflect any changes to the standard method, their historical actions in this regard do not suggest this is likely to occur.</p> <p>2.35 In this respect, prior to the current Local Plan being adopted in 2018 Fylde were reliant on the 1996-2006 Fylde Local Plan which was adopted in May 2003 and did not identify any housing allocations. The defined settlement limits in this previous Plan were drawn in a restrictive manner as the strategic housing requirement over the remaining plan period had already been met by existing commitments. Whilst the Council subsequently adopted the 2004-2016 Local Plan Alterations Review in 2005, this was only a partial review and made no housing allocations and instead introduced an effective moratorium on new residential development.</p> <p>2.36 The advent of the former Regional Spatial Strategy for the North West (RSS) changed the housing position in Fylde. The RSS identified a higher annual housing requirement for Fylde between 2003-2021. Consequently, the former Local Plan not only had no housing allocations or a development 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 in 2008 it was evident that significant edge of settlement greenfield development was 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.</p> <p>2.37 Despite having a clearly out of date Local Plan and a continually rising housing shortfall, Fylde did not make any noticeable progress on a review of the Local Plan for a number of years, not adopting a replacement plan until 10 years later in 2018. In the meantime, they continued to refuse large housing developments, forcing applicants to obtain permission via s.78 appeals. At Appendix 1 is a table showing those housing sites which had to be granted on appeal, which total 2,685 dwellings. Most of these sites ended up being identified as housing allocations in the current Local Plan adopted in 2018.</p> <p>2.38 It is noted that the LPA have undertaken a quick partial review of the 2018 Local Plan, but this is evidently on the basis that it provides them with an opportunity to introduce a lower housing requirement figure. For reasons previously highlighted, it is considered that if the</p>

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	<p>partial review is approved the LPA are unlikely to undertake another quick review of the Plan to reflect an increase in the LHN based on a subsequent change to the standard method. They are more likely to rely on Framework paragraph 73 to protect themselves from having to address a housing shortfall for the next five years.</p> <p>Conclusion</p> <p>2.39 The proposed amendment to Policy H1 in the form of introducing a housing requirement range, by adding a lower annual requirement of 275 dpa into the policy, is unsound for the following reasons.</p> <p>2.40 It is not positively prepared. Framework paragraph 35 confirms that to be sound Local Plans must provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs. The standard method is only intended to provide a minimum starting point in determining the number of homes required and as highlighted in paragraphs 2.22 to 2.23 of this representation the LPA have failed to take into account factors which indicate that a higher requirement than the standard method is appropriate. Using a partial review of the Local Plan to reduce the housing requirement in a recently adopted Local Plan, based solely on a standard method which itself is currently under review and likely to result in an increase in the LHN, cannot reasonably be considered to pass the test of being ‘positively prepared’.</p> <p>2.41 It is not Justified. Framework paragraph 35 confirms that development plans must be an appropriate strategy, taking into account the reasonable alternatives. The strategy of inserting a housing requirement range into the recently adopted Local Plan by adding a lower housing requirement figure is not justified when considering the alternatives. One alternative could be to simply leave the housing requirement as per the adopted Local Plan and not insert the lower 215dpa figure. For reasons highlighted, the proposed amendment offers nothing positive in terms of meeting the Framework objective to significantly boost the supply of housing. Another alternative could be to amend the housing requirement upwards to reflect the revised version of the standard method and allocate additional housing land. This would reflect the Framework objective of significantly boosting the supply of housing. Either alternative is preferable and more line with Framework policy than the proposal in the partial review.</p> <p>2.42 It is not consistent with national policy. A reduction in the annual housing requirement to a figure which is just 58% of the average completion rate over the last 3 years and just 66% of the recently adopted Local Plan requirement, is not consistent with the Framework objective to significantly boost the supply of housing and ensure that the housing requirement of the Borough is delivered. This is particularly the case in the context of the reduced housing requirement being based on a standard method approach which is under review and likely to result in a minimum LHN which is even higher than the current Local Plan requirement. The partial review is a blatant attempt by the LPA to try and introduce a safeguard against the Framework ‘tilted balance’, thereby removing a core element of the Framework’s approach to helping address housing under delivery and boost significantly the supply of housing.</p> <p>3. POLICY H1C) LIVERPOOL APPROACH</p> <p>3.1 As the LPA are reviewing Policy H1 it is appropriate to consider the entirety of the policy and it is considered that the reference in criterion c) to the 5YR supply being based on the “Liverpool approach” should be removed.</p>

Respondent	Text of Representations
	<p>3.2 This relates to the manner in which any shortfall in housing delivery is addressed within the 5YR supply. The Liverpool method spreads this shortfall over the remaining plan period, whereas the Sedgfield method requires the entirety of the shortfall to be delivered within the 5YR period.</p> <p>3.3 When the LPA’s Annual Position Statement was published in January 2020, the Inspector acknowledged that the Local Plan referred to the past shortfall in delivery being addressed across the remaining Plan period (Liverpool) and that this had been found sound. However, the APS Inspector stated in paragraphs 12 to 14 of the report that:</p> <p><i>12. In July 2017, the LP examination was advised that the Council had a 5-year housing land supply (HLS) whether the Sedgfield (5.1-years) or the Liverpool Approaches (6.4- years) were used. However, in September 2017, the Council indicated that the 5-year HLS had dropped to 4.9-years using the Sedgfield Approach or 6.2-years using the Liverpool Approach. The Examining Inspector accepted that the past shortfall could be addressed over the remainder of the plan period in order that the Local Plan delivered a 5-year HLS at the adoption of the LP. To do otherwise would have resulted in the LP being found unsound</i></p> <p><i>13. Notwithstanding the recent adoption of the LP, the APS, continuing to adopt the Council’s approach to determining the components of the requirement and supply, shows that the HLS supply has reduced from 6.2 years to 5.3 years. Despite this material reduction, the Council does not appear to have taken any particular action to address the decline.</i></p> <p><i>14. The objective of national housing policy⁶ is to “...significantly boost the supply of homes...” and a 5-year HLS is regarded as a minimum position. The shortfall in delivery is not a mathematical exercise, it is real households that require homes now. In this context and given the declining supply of housing land, the continued use of the Liverpool Approach to determine the annual requirement cannot be justified”.</i></p> <p>3.4 The APS Inspector’s report therefore applied the Sedgfield method. This report was subsequently quashed and reconsidered, but this was on the basis that APS Inspectors are not entitled to reconsider strategic policies in recently adopted plans or to re-assess the approach to past under-delivery. This partial review of the Local Plan now provides an opportunity to reconsider this matter.</p> <p>3.5 For the reasons highlighted by the APS Inspector in the original report, it is considered that the Sedgfield approach is more consistent with the Framework and that the Liverpool method is contrary to the objectives of the Framework. This is particularly the case where the LPA are proposing to insert a lower housing requirement figure and where the review of the standard method could indicate an even higher Local Housing need than the current adopted Local Plan.</p>
Emery Planning for Hollins Strategic Land	<p>4. The application of the revised requirement for 5-year supply.</p> <p>2.37 In light of the adopted requirement in Policy H1 and the draft Local Housing Need figure of 488, it is clear that a figure of 275 dwellings is a suppression of actual housing need in the Borough. The application of a requirement of 275 dwellings per annum for calculating 5-year land supply would be a direct conflict with the Framework’s policy to boost housing supply. Paragraph 73 of the Framework states:</p>

Respondent	Text of Representations
	<p>“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies³⁶, or against their local housing need where the strategic policies are more than five years old.”</p> <p>2.38 The application of a reduced housing requirement within 5 years of adoption through this Partial Review which has no support in the Framework or the PPG is wholly unjustified. The figure of 415 dwellings per annum must be used for the calculation of the 5 year supply, as that is what the Local Plan allocated land to meet, and if there is a shortfall in achieving that requirement, then unallocated sites must be considered. With the 2018 household projections stating an annual increase of 428 households per annum and the draft Local Housing Need of 488 per annum, then as a minimum the 5-year supply must be calculated on 415 dwellings.</p> <p>2.39 In response to EDPR05 we append (Appendix EP3) our representations to the draft APS which includes our assessment of the sites in the supply. If the Partial Review progresses, then we would update this as part of the Examination.</p> <p>2.40 For these reasons, there is no support in the Framework or PPG for Reason 1 for the Partial Review as being consulted upon.</p>
Cassidy & Ashton for Home Farm	<p>Para. 9.10-9.19 and Policy H1</p> <p>We repeat reference to the impacts of Covid 19 in respect of an impact to delivery rates which are likely to be exacerbated over several years as the economy seeks to recover. Additional land should be identified under Policy H1 in accordance with the comments above.</p>
Pegasus Group for Hallam Land Management Ltd	<p>6. HOUSING SUPPLY & NEED FOR ADDITIONAL ALLOCATIONS</p> <p>Council’s Current 5-Year Supply Position</p> <p>6.1 The Council have a recently adopted APS from 6th May 2020, confirming that they could demonstrate a 5.1 year supply of deliverable housing sites at 1st April 2019.</p> <p>6.2 Fylde have submitted an updated draft APS for 2020 following consultation in June 2020, which claims a 6.01 year supply (which we believe should be 6.06 years due to a counting error).</p> <p>6.3 Given this document carries forward the methodology and delivery assumptions endorsed by the Inspector back in May 2020 on the previous APS (which has also been through the High Court) we do not wish to dispute the detailed findings on five year supply, nor did we make any representations to the June 2020 consultation.</p>

Respondent	Text of Representations																																																																						
	<p>6.4 That said, we do have some more general comments on the full plan period supply and how that might impact the 5 year supply position going forward, particularly if the government’s proposed changes to the standard method come into force during this Local Plan Review.</p> <p>Council’s Total Supply</p> <p>6.5 Firstly, I note that amended paragraph 9.16 in the plan suggests a total plan period supply of 8,819 dwellings, which just exceeds the higher requirement range proposed in the plan (8,715 leaving a surplus of just 1.2%), and it is arguable whether this is sufficient to meet the NPPF objective of significantly boosting the supply of homes, as it allows very little flexibility in terms of providing a choice of sites, or accounting for under delivery (we would generally advocate headroom of at least 10% to provide such flexibility).</p> <p>6.6 Notwithstanding this, the June 2020 Draft APS full plan trajectory indicates a total plan period supply of just 8,401 at 1st April 2020,5 which represents a shortfall of 314 homes or 3.6% of this upper range requirement, which is clearly insufficient.</p> <p>6.7 If the revised standard method figure is used from 2020 onwards the total requirement is 9,591 so shortfall increases to 1,190 or 14%.</p> <p>6.8 This confirms that the Local Plan Review will need to allocate more sites to meet both its adopted and emerging requirement.</p> <p>Ongoing 5-Year Supply through Plan Period</p> <p>6.9 In addition to considering total supply, the table over the page maps out 5-year supply across the plan period based on the trajectory in the June 2020 Draft APS set against existing and emerging requirement scenarios.</p> <p>Figure 6.1 - Ongoing Five Year Supply in Fylde</p> <table border="1" data-bbox="465 938 2128 1417"> <thead> <tr> <th rowspan="2">Year</th> <th rowspan="2">Comp's/ Traj</th> <th colspan="2">Scenario 1</th> <th colspan="2">Scenario 2</th> <th colspan="2">Scenario 3</th> </tr> <tr> <th>Partial Review Low Range Req't (current SM post 2020)</th> <th>Delivery against Low Range Req't</th> <th>Partial Review Proposed High Req't Range (adopted figure)</th> <th>Delivery against High Range Req't</th> <th>Revised Standard Method</th> <th>Delivery against emerging target</th> </tr> </thead> <tbody> <tr> <td>2011/12</td> <td>141</td> <td>415</td> <td>-274</td> <td>415</td> <td>-274</td> <td>415</td> <td>-274</td> </tr> <tr> <td>2012/13</td> <td>162</td> <td>415</td> <td>-253</td> <td>415</td> <td>-253</td> <td>415</td> <td>-253</td> </tr> <tr> <td>2013/14</td> <td>233</td> <td>415</td> <td>-182</td> <td>415</td> <td>-182</td> <td>415</td> <td>-182</td> </tr> <tr> <td>2014/15</td> <td>230</td> <td>415</td> <td>-185</td> <td>415</td> <td>-185</td> <td>415</td> <td>-185</td> </tr> <tr> <td>2015/16</td> <td>315</td> <td>415</td> <td>-100</td> <td>415</td> <td>-100</td> <td>415</td> <td>-100</td> </tr> <tr> <td>2016/17</td> <td>453</td> <td>415</td> <td>38</td> <td>415</td> <td>38</td> <td>415</td> <td>38</td> </tr> <tr> <td>2017/18</td> <td>463</td> <td>415</td> <td>48</td> <td>415</td> <td>48</td> <td>415</td> <td>48</td> </tr> </tbody> </table>	Year	Comp's/ Traj	Scenario 1		Scenario 2		Scenario 3		Partial Review Low Range Req't (current SM post 2020)	Delivery against Low Range Req't	Partial Review Proposed High Req't Range (adopted figure)	Delivery against High Range Req't	Revised Standard Method	Delivery against emerging target	2011/12	141	415	-274	415	-274	415	-274	2012/13	162	415	-253	415	-253	415	-253	2013/14	233	415	-182	415	-182	415	-182	2014/15	230	415	-185	415	-185	415	-185	2015/16	315	415	-100	415	-100	415	-100	2016/17	453	415	38	415	38	415	38	2017/18	463	415	48	415	48	415	48
Year	Comp's/ Traj			Scenario 1		Scenario 2		Scenario 3																																																															
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2011/12	141	415	-274	415	-274	415	-274																																																																
2012/13	162	415	-253	415	-253	415	-253																																																																
2013/14	233	415	-182	415	-182	415	-182																																																																
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2017/18	463	415	48	415	48	415	48																																																																

Respondent	Text of Representations							
	2018/19	490	415	75	415	75	415	75
	2019/20	634	275	359	415	219	415	219
	2020/21	896	275	621	415	481	488	408
	2021/22	660	275	385	415	245	488	172
	2022/23	521	275	246	415	106	488	33
	2023/24	560	275	285	415	145	488	72
	2024/25	354	275	79	415	-61	488	-134
	2025/26	571	275	296	415	156	488	83
	2026/27	423	275	148	415	8	488	-65
	2027/28	342	275	67	415	-73	488	-146
	2028/29	317	275	42	415	-98	488	-171
	2029/30	248	275	-27	415	-167	488	-240
	2030/31	205	275	-70	415	-210	488	-283
	2031/32	184	275	-91	415	-231	488	-304
	TOTAL	8,402	6,895	1,507	8,715	-313	9,591	-1,189

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

Respondent	Text of Representations
	<p>6.10 This table includes the following inputs and assumptions:</p> <ul style="list-style-type: none"> • Three requirement scenarios comprising: <ul style="list-style-type: none"> ○ Scenario 1 ☒ The lower range requirement proposed in the Partial Review dpa, based on current standard method figure of 275 dpa (from 2019/2020 onwards, with the adopted figure of 415 dpa before that). ○ Scenario 2 ☒ The higher range requirement proposed in the Partial Review, based on the adopted requirement of 415 dpa across the plan period. ○ Scenario 3 ☒ The revised standard method figure (currently under consultation), of 488 dpa (from 2020 onwards, with the adopted figure of 415 dpa before that). • The projected supply and historic completion figures are taken directly from the full plan trajectory set out in June 2020 Draft APS (page 55). • In terms of the buffer, we have used 5% buffer throughout, with the exception of the 2020-2025 period (highlighted orange/*) where we use 10%. This is because for the 2020-2025 period we use the supply figure that the Council are claiming within the June 2020 Draft APS (which aligns with our scenario 2) and confirming supply via this route requires a 10% buffer. The 5% buffer is used everywhere else due to the Council’s current and projected performance on the Housing Delivery Test, which is expected to stay above 85% until the final 3 years of the plan period; and will therefore not affect the 5 year supply calculations, as the last full 5 year period within the current plan is 2027-2032. • We do not include historic shortfall in the 5 year calculations, beyond the 2020-2025 period where we use the Council’s figure which does take account of shortfall. This is mainly because the standard method (used in scenarios 1 and 3) does not require shortfall to be considered, on the basis that it is already factored into the affordability ratio in Step 2 of the calculation. Furthermore, existing historic shortfall under scenario 2 should have been largely addressed by the 2022 based on projected completions and would not lead to a 5 year supply deficiency before then. <p>6.11 In summary, it is clear from the table that <u>supply will drop below 5 years as early as 2022 under the government’s proposed methodology (Scenarios 3/ 488 dpa) and by 2024 under the adopted figure (Scenario 2);</u> and the position is even worse if historic shortfall is taken into account or if a higher buffer were to be applied.</p> <p>6.12 Furthermore, whilst the Council have sought to take account of the impacts of COVID as much as possible within their latest delivery rates, based on discussions with developers; this evidence was gathered during the early stages of the pandemic before the full impacts were known, both in terms of market demand and construction timetables, and therefore it is likely that circumstances will have changed, which will more than likely lead to an overall reduction in delivery rates (and we address this in more detail below).</p> <p>6.13 This confirms that the Local Plan Review will need to allocate sites to shore up supply in the latter parts of the plan period, both in Warton and across Fylde to deliver the requirement in full and to maintain an ongoing 5-year supply.</p>

Respondent	Text of Representations
	<p>Total Requirement</p> <p>6.14 Using the emerging standard method figure of 488 dpa from 2020 onwards, generates a total plan period requirement of 9,591 dwellings, which increases to 10,550 if a 10% headroom is applied to allow for choice and flexibility as suggested above. This would require land for an additional 2,149 dwellings being identified within the plan review to 2032 to meet Fylde’s needs alone, and even more to take account of unmet need in the adjacent Fylde Coast authorities, or if the plan period were to be extended to cover 15 years from adoption as recommended.</p> <p>6.15 Even continuing with the adopted figure of 415 dpa, with 10% headroom, would require a total supply of 9,587, requiring land for a further 1,186 dwellings to be identified.</p> <p>General Comments on Supply/ Methodology</p> <p>6.16 In addition to the issues set out above, we also raise some other general points on housing supply and the methodology and delivery rates used by the Council within their APS.</p> <p>Windfall</p> <p>The Council propose a windfall rate of 40 dpa going forward (from the latter 2 years of the 5 year period), based on historic delivery and consents, which equates to 360 across the final 9 years of the plan period. Whilst this was endorsed by the Local Plan Inspector back in 2018, we raise two concerns with this going forward. Firstly, we would expect windfall delivery to naturally fall away in the coming years due to an inevitable decrease in land availability, with more land already being allocated or consented; whilst the presence of newly adopted policies and a confirmed 5-year supply will also make it more challenging to gain consent on unallocated sites. Secondly, COVID is likely to have a disproportionate impact on smaller, windfall type development, due to tightened lending/ mortgage criteria for smaller developers and private individuals who would traditionally bring this sort of development forward; as well as the potential for reduced demand in the medium term.</p> <p>Impact of COVID on large site delivery</p> <p>6.17 As noted in the previous section, the impact of COVID is likely to lead to a general reduction in delivery rates across the board. This could have a significant impact in Fylde, given its reliance on a small number of very large sites, meaning that if any of these were not taken forward, or delivery rates were to slip, it could have a significant impact on overall delivery. It is accepted that the major national housebuilders should have sufficient resources, and finance mechanisms to keep the majority of their outlets open and delivering through the emerging recession, and should also have the technical expertise to meet associated social distancing requirements; however it may not be as easy for private developers who have fewer technical resources and face tighter lending restrictions.</p> <p>6.18 One example of this is the Queensway site (Allocation HSS1), which has consent for 948 dwellings, and is being built out by a private developer Kensington Developments, with 53 completions to date. The APS assumes delivery of 125 dwellings in the next 5 years and a rate</p>

Respondent	Text of Representations
	<p>of 55 dpa beyond that; however this could reduce significantly or fall away entirely if they cannot secure ongoing funding or contractors who cannot remain viable with distancing restrictions in place.</p> <p>Conclusions and Suggested Revisions to Plan</p> <p>6.24 Based on our analysis within sections 5 and 6 we suggest that the Council adopt the emerging standard methodology figure (which currently stands at 488 dpa) from 2020 onwards, and apply a 10% supply buffer on top of this to allow for choice and flexibility. This generates a total plan period requirement of 10,550 to 31st March 2032 and based on current trajectory will require land for additional 2,150 dwellings.</p> <p>6.25 Fylde will also need to consider unmet needs across the Fylde Coast HMA, where the requirement is also likely to increase as a result of the revised standard methodology, particularly given the well known supply constraints in both Wyre and Blackpool.</p> <p>6.26 Accordingly we recommend that policies DLF1 and H1, and the relevant supporting text in chapters 1, 5 and 9 is updated on this basis.</p> <p>[section 7 of the representation] Policy H1: Housing Delivery and Allocation of Housing Land – See our comments within sections 5 and 6. The Local Plan should apply a requirement of 415 dpa per annum for the period 2011-2020 and 488 dpa from 2020-2032, to provide a minimum overall requirement of 10,500 homes. Related supporting text within chapter 9 should also be updated on this basis.</p> <p>[conclusions]</p> <p>8.2 The partial review seeks to take forward a minimum housing requirement in Fylde based on the current standard method figure of 275 dpa which is a significant reduction from the adopted figure of 415 dpa, which is retained as an upper range requirement, thus generating a total requirement of between 6,895 and 8,715 dwellings across the plan period, which they suggest can be met through existing commitments and allocations.</p> <p>8.3 The current standard method generates a similar reduction in the requirement in Wyre compared to the adopted position (down from 460 dpa to 308 dpa), and Fylde therefore argue that there is no longer any unmet need in Wyre (or the wider HMA), which was the basis of the partial review, and therefore no need to make any additional allocations or provision for this.</p> <p>8.4 However, the government have recognised issues with the current methodology and are currently consulting on a revised method to boost housing delivery across the country, with the current calculation generating a need of 488 dpa in Fylde, an increase of 77% from the current standard method figure and 18% from the adopted plan figure. It also generates a total need figure of 1,174 dpa across the Fylde Coast which is 68% higher than the current figure claimed by the Council (697 dpa).</p> <p>8.5 Whilst this has not yet come into force, we suggest that the Council will need to start planning for this level of need as it is likely to come in soon and unlikely to change significantly.</p>

Respondent	Text of Representations
	<p>8.6 This will require significant additional housing allocations across Fylde both to meet its own needs and potentially those of the wider HMA, as both Wyre and Blackpool have well known supply constraints (comprising environmental and highways constraints in Wyre, and a simple lack of undeveloped land in Blackpool).</p> <p>8.7 Based on the emerging methodology, with an additional buffer to provide choice and flexibility we suggest the total plan requirement to 2032 should be at least 10,550. Given the Council’s latest claimed supply is actually 8,401 (not the 8,819 claimed in paragraph 9.16 of the plan), this will require additional allocations for at least 2,150 dwellings.</p> <p>8.8 This figure will need to be increased further to meet unmet needs from the wider HMA, and if the plan period is extended as recommended, to cover 15 years from adoption (i.e. from 2032 to 2036/2037 depending on timetable).</p> <p>8.9 We recommend changes to policies DLF1 and H1 and supporting text in chapters 1, 5 and 9 on this basis; whilst also providing additional comments on the other policies that have been updated.</p>
Paragraph 9.22: land available to deliver range	
Lambert Smith Hampton for AXA	<p>We disagree with the suggestion that the partial review in that it has not taken the opportunity to explore further allocations of land we believe that this review offers an opportunity to consider further potential allocations of land. We are mindful of a number of key objectives set out in the Governments “Planning for the Future” White Paper of August 2020 namely to:-</p> <ul style="list-style-type: none"> • support home ownership, helping people and families own their own beautiful, affordable, green and safe homes, with ready access to better infrastructure and green spaces; • increase the supply of land available for new homes where it is needed to address affordability pressures, support economic growth and the renewal of our towns and cities, and foster a more competitive housing market <p>We believe that there is an affordability issue within the Fylde and that more housing should be provided to allow for an increase in housing land supply as envisaged in the Government’s white paper. We note that the partial review is intended to address the publication of the 2019 version of the NPPF, with this in mind we would highlight paragraph 59 of the NPPF which states: -</p> <p><i>To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay</i></p>

Respondent	Text of Representations
Paragraph 9.24: cross-reference to Monitoring Framework	
	No representations received in relation to this section
Paragraph 9.49: residential gardens	
	No representations received in relation to this section
Paragraph 9.57: alternative uses	
	No representations received in relation to this section
Paragraph 9.58 demand for land	
Lambert Smith Hampton for AXA	We note that within the partial review it is not intended to revise the protection of existing employment sites. If this approach is to be adopted, then land which is not identified for employment uses should be considered for allocation for housing development. AXA is willing to bring its sites forward for development.
Paragraph 9.67: affordable housing	
Cassidy & Ashton for Home Farm	Para. 9.67 It is acknowledged that the annual affordable housing requirement is 249 dwellings but that this cannot be achieved. However, the delivery of affordable housing should remain a key aspiration and it should be acknowledged that these are more likely to be delivered through strategic development sites.

Respondent	Text of Representations
Policy H6: Isolated New Homes in the Countryside	
	No representations received in relation to this section
Paragraph 11.1: Infrastructure	
	No representations received in relation to this section
Paragraph 11.2: definition of infrastructure	
	No representations received in relation to this section
Paragraph 11.7: new infrastructure	
	No representations received in relation to this section
Paragraph 11.12: IDP	
	No representations received in relation to this section
Paragraph 11.59: parking standards	
Bryning-with-Warton Parish Council	<p>Chapter 11(Page 43)</p> <p>These parking standards now need strict adherence in all future developments and it is a welcome revision although disappointing that as a planning Authority Fylde has been slow to advance such important issues in recent years.</p>

Respondent	Text of Representations
Policy ENV1 Landscape	
Bryning-with-Warton Parish Council	<p>Policy ENV1.Coastal Change Management Area</p> <p>Positive support for revision from ""does not adversely affect..." to "Promotes".</p>
Paragraph 13.6: valued landscapes deleted	
	No representations received in relation to this section
Paragraphs 13.16 and 13.17: tranquil areas	
	No representations received in relation to this section
Policy ENV2 Biodiversity: nature conservation sites and ecological networks	
Story Homes	<p>Story Homes supports the inclusion of biodiversity net gains in Policy ENV2 given its prominence in the emerging Environment Bill. Whilst its inclusion is supported it is considered that details on the qualitative aspect of net gain should be included within the revisions. This will give greater clarity to developers and landowners alike and ensure policy compliance with emerging planning applications. Story Homes welcomes greater clarity on this.</p>
Pegasus Group for Hallam Land Management Ltd	<ul style="list-style-type: none"> • Policy ENV2: Biodiversity – HLM are wholly supportive of protecting and enhancing biodiversity as part of development proposals. However, where net gain is not achievable on-site, the Council will need to find alternative sites and projects where biodiversity improvements can be made, such that applicants can off-set their impacts through financial contributions. It is suggested that such schemes are secured and costed at the earliest possible time, to provide accurate financial obligations for applicants that meet the relevant CIL tests, otherwise this could lead to delays in developments coming forward.

Respondent	Text of Representations
Policy ENV2 Biodiversity: Priority Species Protection	
	No representations received in relation to this section
Paragraph 13.29: monitoring	
	No representations received in relation to this section
Paragraph 13.36: strategic approach	
	No representations received in relation to this section
Policy ENV3 Protecting Existing Open Space (Part of the Green Infrastructure network)	
Sport England	Sport England have no comments in relation to the reference changes to the NPPF (2019) as suggested throughout the document and agree with the references made to paragraph 96 and 97.
Paragraph 13.52: heritage assets	
	No representations received in relation to this section
Paragraph 13.59: local heritage	
	No representations received in relation to this section

Respondent	Text of Representations
Glossary: affordable housing	
	No representations received in relation to this section
Glossary: Infrastructure	
	No representations received in relation to this section
Glossary: National Planning Policy Framework (The Framework)	
	No representations received in relation to this section
Appendix 1: FBLP Policy EMP5	
	No representations received in relation to this section
Appendix 1: FBLP Policy TREC5	
	No representations received in relation to this section
Appendix 1: FBLP Policies TREC15 and TREC16	
	No representations received in relation to this section

Respondent	Text of Representations
Appendix 1: FBLP Policy EP26	
	No representations received in relation to this section
Appendix 1: FBLP Policy EP27	
	No representations received in relation to this section
Appendix 1: FBLP Policy EP28	
	No representations received in relation to this section
Appendix 1: FBLP Policy EP30	
	No representations received in relation to this section
Appendix 1: FBLP Policies SH13 and SH14	
	No representations received in relation to this section
Appendix 1: FBLP Policy SH15	
	No representations received in relation to this section

Respondent	Text of Representations
Appendix 1: FBLP Policy CF8	
	No representations received in relation to this section
Appendix 8 Performance Monitoring Framework Indicator 1	
	No representations received in relation to this section
Appendix 9: Evidence Base: General	
	No representations received in relation to this section
Identification of Strategic Policies (Appendix 1 to the Schedule of Revisions)	
	No representations received in relation to this section

3. Text of Representations Relating to Matters Not Considered Within the Partial Review

- 3.1 Some representors have raised issues that they consider relevant and wish to include within their representation to the Partial Review. These have been related in this section to relevant policies of the adopted Local Plan (policies which are not being reviewed) and those sections of the representations are reproduced in full in Table 2 below. As with Table 1, graphics such as site location plans are not reproduced here for sake of clarity but can be viewed in the original representation within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document).

Table 2: Text of Representations Relating to Matters Not Considered Within the Partial Review

Respondent	Text of Representations
FLP32 Policies SL1-SL5 Strategic Locations for Development and Development Sites outside the Strategic Locations for Development	
Lambert Smith Hampton for AXA	<p>We are of the view that some of our client’s landholdings could make a valuable contribution to meeting housing need both within Fylde and the need within the neighbouring borough of Wyre that cannot be met within Wyre itself.</p> <p>AXA is willing to bring its surplus land forward for development. The land in question does not lie within the Green Belt is capable of being accessed, is within easy walking distance of shops and services and benefits for existing flood defences. The land does not have any identified ecological or landscape value. The landholdings in AXA’s control are available now, further they are in a suitable location for development, and subject to the grant of planning consent have a realistic prospect that housing will be delivered on the site within the next 5 years.</p>
Emery Planning for Wainhomes North West Ltd	<p>4. Proposed Development Sites</p> <p>4.1 Whilst the Partial Review is not considering existing or proposed allocations, the draft revised standard method results in a significantly higher local housing need for both Fylde and the wider HMA. As result, the plan review will need to identify additional sites in order to meet the new minimum local housing need, once adopted. We therefore propose the following sites through this process or a full review if that is decided to now be the appropriate procedure:</p> <ul style="list-style-type: none"> • Land west of Bryning Lane, Wrea Green; and, • Land at Clifton. <p>Land west of Bryning Lane, Wrea Green</p> <p>4.2 The site is located to the edge of Wrea Green and is presently in use for agricultural purposes. It comprises a logical infill and rounding-off opportunity for the settlement as the site is enclosed by the existing settlement boundaries and existing residential development to the immediate northern, eastern and southern boundaries. A site location plan is provided at Appendix EP4 of this Statement.</p> <p>4.3 There are no trees within or adjacent to the site of any significance and the site lies outside of the designated Wrea Green Conservation Area.</p> <p>Planning History</p>

Respondent	Text of Representations
	<p>4.4 The site was identified as a housing allocation for approximately 20 dwellings through Policy HL1 of the Fylde Local Plan, adopted in 1994. The supporting text to the adopted local plan at paragraph 3.19 stated that the purpose of this allocation was to meet unmet housing needs and that vehicular access should be taken via Bryning Avenue.</p> <p>4.5 An outline planning application was subsequently submitted by Redrow Homes in 1999 and officers recommended that planning approval be granted on the basis that the site could accommodate approximately 60 dwellings (LPA ref: 5/99/0784). However, Committee Members resolved to refuse planning permission against the advice of planning and highways officers on the basis of highways safety and Redrow Homes submitted an appeal to the Planning Inspectorate with a Public Inquiry scheduled to commence in July 2001 thereafter. On the basis of the reluctance of the landowner to sell the land at the time, Redrow Homes withdrew their appeal and the case was not heard by the Planning Inspectorate.</p> <p>4.6 As a result the site was not carried forward as a retained housing allocation through the Fylde Borough Local Plan (October 2005), which comprises the current development plan, and is an amalgamation of the Fylde Borough Local Plan 1996-2006 and the Fylde Borough Local Plan Alterations Review 2004-2016.</p> <p>Application 16/1028 and Appeal 3179809</p> <p>4.7 This application for 41 houses was submitted in December 2016. During the course of the application revisions were made to the layout following a meetings and discussions with officers. This resulted in Rev C of the layout submitted in April 2016. However during the application process Lancashire County Council objected on highway grounds and whilst the applicant evidenced that the impact would be acceptable, it was apparent that the highway objection would not be lifted and therefore the applicant was left with no other option but to appeal against nondetermination.</p> <p>4.8 The appeal was considered at an Inquiry in April 2018. Between the appeal being heard and determined in February 2019 there were material changes in policy which included the adoption of the Local Plan. Therefore, the appeal was dismissed. However, paragraph 61 states that there was no site-specific issue of any more than limited adverse harm with the development of the site. It states:</p> <p style="padding-left: 40px;"><i>“61. Wrea Green would not be a sustainable location for the residential development proposed, which would conflict with Policies DLF1, S1, GD1 & GD4 in the Local Plan, and this is a matter to which I give significant weight. There would be limited harm to the character and appearance of the area, but in consequence conflict would arise with Policies GD7 & ENV1. Although there would be compliance with other aspects of Policy GD7 concerning highway safety, the relationship with nearby uses and biodiversity, and the level of affordable housing sought by Policy H4 would be provided, I conclude that the proposal would be contrary to the Development Plan considered as a whole.”</i></p> <p>4.9 On the basis of no site-specific issue, the significant uplift in the housing requirement means that the site should now be considered for allocation.</p> <p>Timing and delivery</p>

Respondent	Text of Representations
	<p>4.10 Our client is an active developer in the North West and they have an option agreement with the landowner and our clear instructions are that the site will be brought forward for housing as soon as possible. We consider that the timetable for the site would be that site preparation would commence some 6 months after consent with development complete within 2 years.</p> <p>Layout</p> <p>4.11 The site is enclosed on three sides by the built-up settlement boundaries (north, east and south) and existing residential built development. The site represents a logical residential rounding-off opportunity for the settlement and residential development would sit comfortably within the character and appearance of the existing built form. Furthermore, the NPPF is clear that ‘protection’ is a term to be applied to landscape designations and local planning authorities should not seek to protect the open countryside ‘for its own sake’. The site is not the subject of any landscape designations.</p> <p>4.12 Public views into the site would be localised and largely screened or influenced by the existing built development that encloses the site. The site is relatively flat with no public rights of way extending through it.</p> <p>4.13 The layout in Appendix EP5 demonstrates that this quantum of development could deliver an attractive, high quality design for the site with a coherent and legible response to the character and appearance of the surrounding area. The number of dwellings proposed would be fewer than that previously found to be acceptable by planning officers in visual amenity terms through planning application 5/99/0784. Appeal 3179809 confirmed the acceptability of the layout with the appropriate conditions.</p> <p>Access</p> <p>4.14 The site is highly locationally sustainable as it is within easy and convenient walking distance of the range of services available within Wrea Green that include Ribby with Wrea Endowed Church of England Primary School, local shops, places of worship, sporting venues and public houses. There is also good public transport. Vehicular access would be via an established access point off Bryning Lane. The number of dwellings being provided would be fewer than that previously found to be acceptable by highway officers and the Inspector in highway safety terms through the appeal. Paragraph 45 of the appeal decision states:</p> <p style="padding-left: 40px;"><i>“I conclude that the proposed development would not adversely affect traffic movement and highway safety on this part of Bryning Lane or on the wider highway network. In this respect there would be no conflict with Policy GD7(q) of the Local Plan or paragraph 109 of the NPPF.”</i></p> <p>Flood risk and drainage</p> <p>4.15 The site is identified through the Environment Agency mapping system as being at low risk of flooding and within a Flood Zone 1. Paragraph 56 of the appeal decision states:</p> <p style="padding-left: 40px;"><i>“The main parties have suggested a condition which would require the implementation of a drainage scheme including an approved rate of discharge and attenuation measures. I am satisfied that such an approach would ensure that the appeal proposal would not exacerbate flood risk in Wrea Green.”</i></p>

Respondent	Text of Representations
	<p>Ecology</p> <p>4.16 The site is not subject to or within influencing distance of any statutory ecological sites and there are few ecological features within the surrounding area.</p> <p>Conclusion</p> <p>4.17 The proposed development represents an opportunity for the Council to address unmet and future housing needs through the release of a highly sustainable site with very limited environmental harm that would be far outweighed by the associated social and economic benefits.</p> <p>4.18 The suitability of the site as a housing site has already been recognised by the Council through its allocation for housing for the Fylde Local Plan (1994). The only reason why the site did not remain as a retained housing allocation within subsequent iterations of the local plan was that the landowner at the time was unwilling to sell. The landowner is now actively promoting the sale of the land and our client has an option agreement to bring it forward for residential development. The appeal decision in February 2019 confirmed there was no site-specific issue that would prevent the development of the site should the principle of development be accepted. With the significant uplift in the housing requirement should the draft methodology be adopted, the site should now be considered for allocation</p> <p>Land west of Clifton Lane, Clifton</p> <p>4.19 A Location Plan is enclosed as Appendix EP6.</p> <p>4.20 The site is located off Preston Old Road. The site amounts to approximately 4.5 hectares. It is roughly rectangular in shape and currently agricultural pasture used predominantly for the grazing of sheep. There is an overhead electricity cable running east to west across the site.</p> <p>4.21 The site is on the northern edge of the village of Clifton. The village is located within the Fylde Borough Council administrative area. Preston City Centre is approximately 7.5 kilometres to the east.</p> <p>4.22 The northern and western boundaries of the application site are demarked by well-defined fencing and dense treeline. The western boundary also comprises an existing watercourse. The site is bound to the south by a residential development and to the east by Clifton Lane.</p> <p>4.23 Within walking distance of the application site, there is a village green and a range of amenities and services which serve Clifton including a post office, off-licence, café and a garage. Dobbies Garden Centre and its on-site restaurant are also located within walking distance of the site and village.</p> <p>4.24 There are good transport links to Clifton and the site. The No.61 bus route, which serves bus stops within 400 metres of the application site (an acceptable walking distance as per the CIHT document 'Planning for Public Transport in Developments'), passes through</p>

Respondent	Text of Representations
	<p>the village and provides a route between Blackpool and Preston. On weekdays, the service is half hourly from approximately 0530 through to 2030, after which a service is approximately hourly through to a westbound service at 2348, and eastbound service at 2310. Salwick Train Station is located approximately 1.4 kilometres to the north of the site, where passengers can connect between Colne and Blackpool. The local service passes through Preston, a service which takes less than ten minutes, which allows access onto the wider national rail network including local, regional and nationwide locations.</p> <p>4.25 Vehicular access and pedestrian access to the site will be taken via the new estate road implemented via planning permission for the residential development to the south (outline planning permission reference 15/0763). That estate road is accessed via Preston Old Road to the south.</p> <p>4.26 The site was the subject of a planning application (19/0687) it was refused on 30th April 2020. The reasons for refusal were not site specific but related to housing supply and distribution policies not requiring a greenfield site at Clifton to come forward. That decision was taken on the policies at the time and for this submission, it is being put forward as being suitable to meet housing needs through this Partial Review on the application of the draft Standard Method or a full plan review.</p>
Gladman Developments	<p>5 SITE SUBMISSION</p> <p>5.1 Land at Bryning Lane, Warton</p> <p>5.1.1 As explained in Sections 3 and 4 above, to ensure that the FLP32 is able to respond to any unmet needs from adjoining authorities and future increases in the Council's own housing requirements, Gladman believe that the Council should now be looking to identify further allocations through the Partial Review process.</p> <p>5.1.2 In this respect, Gladman have an interest in Land at Bryning Lane, Warton. The site extends to a total area of 6.84 ha and is shown in Figure 1 below.</p> <p>[site location plan for the site referred to: see Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>5.1.3 Land at Bryning Lane, Warton is well positioned to deliver a sustainable residential development to meet the area's housing needs. Situated within the Warton Strategic Location and a recognised location for further growth within the Fylde Borough area, the site could accommodate a deliverable housing scheme of up to 155 market and affordable dwellings (30% affordable housing).</p> <p>5.1.4 As demonstrated below and on the Development Framework Plan provided as Appendix 1 to these submissions, there are no infrastructure, technical or environmental constraints that would prevent the site's delivery or preclude a sustainable proposal from coming forward in this location. The entirety of the site is located outside of the Green Belt, which currently defines the extent of Warton to the east and west.</p>

Respondent	Text of Representations
	<ul style="list-style-type: none"> • The site is situated immediately adjacent to the existing settlement edge, the recently consented and under-construction Blackfield Green development and within walking and cycling distance of Warton's existing services and amenities. Any development proposals would also be accompanied by enhancements to pedestrian and cycling infrastructure, including connections to the existing footway situated along Church Road and National Cycle Route 62 along Hillock Lane. • Any development would be set within a comprehensive framework of new green infrastructure and landscape planting. New tree and hedgerow planting along the site's boundaries would help to filter views of the development from the surrounding landscape and help to integrate the site into its setting. • Ecological surveys have identified that with proposed mitigation, the development of the site would not result in any residual significant negative effects to important ecological features and species, including bats and birds. The site does not offer feeding or foraging opportunities for species associated with the Ribble and Alt Estuaries European Protected Sites. Overall, the development proposals have the ability to deliver net biodiversity gains through measures that include the retention and strengthening of linear boundary features, attenuation basins and new bird and bat nesting opportunities. • The site could be safely accessed via a new priority-controlled junction of Hillock Lane and the proposed site access road, with Hillock Lane forming the minor arm of the junction. Further highway enhancements that could be provided as part of any development proposals include the introduction of a pedestrian crossing along Hillock Lane, adjacent the proposed pedestrian access to the Blackfield Green development, to further enhance the site's permeability. • The site is situated within Flood Zone 1 and is therefore at low risk of fluvial flooding. The site could be served by existing or enhanced utilities infrastructure, including water, gas, electric and telecommunications, and is not constrained by the presence of any utilities within the site area. <p>5.1.5 Gladman and the site's owners would now welcome further discussions with the Council's officers, as we look to realise Land at Bryning Lane's development potential and the role that the site could play in meeting the area's housing needs. The site is deliverable, as it is available now, offers a suitable location for development, and is achievable.</p>
Savills for Fylde Coast Care Village Ltd	<p>The Site and Relevant Planning History</p> <p>The application site is shown in detail on attached Existing Site Layout Plan (ref. 05553 MP 00 0202).</p> <p>The site measures approximately 8 hectares. It is currently an established leisure destination located just outside Lytham, occupied as a caravan park comprising static caravans and buildings associated with the use such including a former restaurant, workshops and internal site infrastructure. The buildings however are now redundant and are becoming dilapidated. The site is therefore previously developed land.</p>

Respondent	Text of Representations		
	<p>The site is located on the A584, Lytham Road which links Lytham St Annes to Warton, Freckleton and Preston. There is a bus service along that route with a stop adjacent to the site entrance which provides access to the surrounding towns and villages of Warton, Lytham, Preston and Blackpool.</p> <p>In the adopted Fylde Local Plan the site is designated as Green Belt under Policy GD2. The site is therefore an existing developed site within the Green Belt.</p>		
	Application Reference	Description	Decision / Date
	16/0992	Outline application with all matters reserved except for means of access for the redevelopment of the site as a mixed use scheme comprising: (1) up to 33 single storey assisted living units (use class c2) with a maximum overall volume of 10,400 cubic metres; (2) a two storey care home (use class c2) with a maximum overall volume of 14,700 cubic metres; (3) replacement of two single storey dwellings with two 1.5 storey dwellings (use class c3) with a maximum overall volume of 800 cubic metres; (4) a single storey mixed use building including a public leisure/café facility (use class d2/a3) and ancillary retail shop (use class a1) with a combined maximum overall volume of 2,600 cubic metres; (5) a bowling green; and (6) associated revisions to internal access routes and landscaping	Approved 05 September 2018
	09/0587	Extension and reorganisation of existing touring / static caravan park. Resultant site to provide 49 touring caravan plots and 46 static caravan plots along with amended parking arrangement & internal access roads and additional landscaping	Approved 15 January 2010
	<p>The key planning permission is the outline planning permission granted for a mixed use care village scheme, comprising a mixture of 33 assisted living units, two storey care home, two 1.5 storey dwellings and supporting food retail and leisure uses was granted in 2018 and remains extant (ref. 16/0992).</p> <p>Policy GD2 of the adopted Fylde Local plan relates to Green Belt and states: <i>'The Green Belt within Fylde is shown on the Policies Map. Within that area national policy for development in the Green Belt will be applied.'</i> The National Planning Policy Framework (NPPF) states that new development in the Green belt should be approved in Very Special Circumstances (paragraph 144). In its consideration of the above outline planning application the Council concluded that Very Special Circumstances for the proposal existed and therefore approved. Further details are included within the Planning Officers Report to Committee dated 1 August 2018.</p>		

Respondent	Text of Representations
	<p>In light of the above, the site is considered to be suitable and deliverable for the development of new housing. Accordingly, we are currently in the process of engaging in pre-application discussions with the Council for proposal to redevelop the site for housing.</p> <p>Summary and Conclusion</p> <p>In summary:</p> <ol style="list-style-type: none"> 1. The site is an existing developed site in the Green Belt. 2. It has an extant outline planning permission for redevelopment for a mixed-use care village scheme. 3. It should therefore be identified in the Local Plan as an acceptable housing site.
<p>Emery Planning for Hollins Strategic Land</p>	<p>4. Land east of Fleetwood Road, Wesham</p> <p>4.1 Whilst the Partial Review is not considering existing or proposed allocations, the draft revised standard method results in a significantly higher local housing need for both Fylde and the wider HMA. As result, the plan review will need to identify additional sites in order to meet the new minimum local housing need, once adopted. We therefore propose the site east of Fleetwood Road for allocation, edged red on the map below.</p> <p style="padding-left: 40px;">[plan of site can be viewed in the original representation within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>4.2 The site is 8.5ha in area and is located to the east of Fleetwood Road, Wesham. The site has capacity to accommodate approximately 175 dwellings. Enclosed as Appendix EP4 is a concept Plan for the site.</p> <p>4.3 The site comprises three agricultural fields which encircle a number of existing commercial buildings. To the north of the site is a lane and public right of way, to the east is Medlar Brook, and to the south is residential development. Beyond Fleetwood Road to the west is a substantial mixed-use development which comprises a 6,000-seat football stadium, multi-use pitches, industrial units, a supermarket, restaurant and petrol station.</p> <p>4.4 Along with the proximity to the mixed-use development at Mill Farm, a number of local services and facilities are also accessible by walking/cycling. The site is well located, adjacent to the Local Service Centre of Wesham and the neighbouring Key Service Centre of Kirkham. Kirkham and Wesham railway station is within walking distance of the site and regular bus services run along Fleetwood Road, connecting the site to the wider area. As such, the site is in a highly sustainable location.</p> <p>4.5 The site has been the subject of the following reports:</p> <p>Ecological Report</p>

Respondent	Text of Representations
	<p>4.6 This confirms that a development at the site is feasible and acceptable in accordance with ecological considerations and the NPPF. Adverse effects on designated sites for nature conservation, ecologically valuable habitats and protected species are reasonably discounted and Reasonable Avoidance Measures and best practice actions to ensure compliance with wildlife legislation will be implemented.</p> <p>4.7 Measures to achieve a net gain for biodiversity in accordance with the development proposals are specified and are entirely feasible to achieve compliance with the NPPF.</p> <p>Flood Risk and Drainage Management Strategy</p> <p>4.8 This confirms that the site is within Flood Zone 1 and that residential development is appropriate. There will be no increase in flood risk elsewhere due to the proposals.</p> <p>Noise Impact Assessment</p> <p>4.9 This has determined that the boundaries of the site with Fleetwood Road are subject to medium risk with the vast majority of the site subject to low/negligible risk during the daytime and nighttime periods. Accordingly, areas along the boundaries with Fleetwood Road require good acoustic design but the development of the site entirely feasible.</p> <p>Transport Assessment</p> <p>4.10 This confirms that the location of the site provides a good context for journeys to be undertaken on foot and by cycle. A range of destinations are accessible to site residents by bus and rail, including amenity and employment locations.</p> <p>4.11 Comprehensive junction analysis and modelling has been undertaken. It is concluded that the proposed residential development would not have a detrimental impact on the operational performance of the highway network.</p> <p>4.12 It is concluded that the development is in accordance with national and local transport policies and there are no transport/highways reasons for refusal of planning permission.</p> <p>Landscape Assessment</p> <p>4.13 The Landscape Assessment confirms that the proposed development incorporates several elements which will facilitate its integration within the surrounding landscape context and which will help to ameliorate potential adverse landscape and visual effects associated with it.</p> <p>Tree Survey</p> <p>4.14 This identified a number of trees within and adjoining the site, none of which are Category A. The majority of trees within/adjoining the site are Category B or C.</p> <p>Ground Desk Study Assessment Report</p>

Respondent	Text of Representations
	<p>4.15 This Report identifies potential backfilling of a clay pit and associated potential ground gas as a potential risk but states that the lack of development and industrial use on-site indicate that there is unlikely to be a significant environmental legacy of contamination. The development of the site is feasible.</p> <p>Utilities Statement</p> <p>4.16 This demonstrates that the site can be serviced by utilities.</p> <p>Delivery</p> <p>4.17 As the LPA will be aware, Hollins Strategic Land has a proven track record of delivery of housing. It takes on average around 12 months to submit a reserved matters (RM) application from outline consent, but in some instances only 2 or 5 months. On average, more recently, building is starting within 2 years from outline consent.</p> <p>4.18 In addition, the Hollins Strategic Land can contractually oblige housebuilders to submit RM much quicker than would normally be the case if the housebuilder gained the outline consent themselves. This can be for several reasons: open marketing is a much more competitive process, with various housebuilders trying to outbid each other, as well as landowner seeking a return sooner. It is in the Hollins Strategic Land's interest to have reserved matters submitted as quickly as possible, either through their sister company Hollins Homes or a contractual arrangement to the housebuilder. Hollins Strategic Land will also oversee and input their expertise into any RM application so the process is smoother and faster.</p> <p>4.19 The site represents a highly logical location for allocation and there are no site-specific constraints that would prevent development from coming forward on the site.</p>
Pegasus Group for Hallam Land Management Ltd	<p>2. WARTON SETTLEMENT ANALYSIS</p> <p>2.1 Warton is a settlement with a population of approximately 3,600 people. It is adjacent to the settlement of Freckleton, which is located to the east and connected via the A584 Lytham Road, which is the main route through Warton running east to west. The combined urban area of Freckleton and Warton has a residential population of approximately 9,500 people (according to the 2011 Census)¹.</p> <p>[Aerial photo follows: see the original representations within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>2.2 Warton is home to a large BAE Systems facility, which includes areas of land that have been designated as an Enterprise Zone as part of the Lancashire Advanced Manufacturing and Energy Cluster (LAMEC), described in more detail below. Other large employers in the area include the Land Registry, which occupies offices located to the south west of Warton.</p> <p>2.3 Warton includes a number of day-to-day services and facilities including:</p>

Respondent	Text of Representations
	<ul style="list-style-type: none"> • Education - 2 x Primary Schools, 2 x day nurseries; • Social - 2 x Churches, Village Hall, Scout Hut, 2 x Public Houses, Social Club; • Recreational- Bridges Playing Fields, Play Area, BAE Sports and Social Club; and • Retail - Tesco/ Subway and parade of shops on Lytham Road, Coop Harbour Lane, Petrol Station. <p>2.4 Freckleton also has a medical surgery and dentist, and a range of shops and other services.</p> <p>2.5 Lytham is located 5.5km to the west of the application site and is separated from Warton by Green Belt land. Kirkham is located approximately 5.5km to the north and is also largely separated by Green Belt land.</p> <p>Warton Enterprise Zone</p> <p>2.6 Warton Aviation Enterprise Zone is a 75 Ha site situated alongside BAE Systems’ existing operation at Warton and is focussed on advanced engineering and manufacturing, and is joint with a similar 72 Ha Enterprise Zone adjacent to the BAE facility at Samlesbury, within South Ribble, which is also focussed on advanced engineering and manufacturing. These two facilities formed the original Lancashire’s Advanced Manufacturing and Engineering Enterprise Zone established in 2012.</p> <p>2.7 This EZ has since been expanded to include two further sites at Blackpool Airport in Blackpool (focussing on Energy, Wind, Nuclear & Waste to Energy) and Hillhouses, within Wyre (focussing on Energy, Chemicals and Polymers) and is now known as the Lancashire Advanced Manufacturing and Energy Cluster (LAMEC).</p> <p>2.8 These four sites represent the largest number of EZs to be awarded to a single LEP area, and these form a key part of Northern Powerhouse economic and investor offer, with the aspiration of creating over 10,000 high value jobs.</p> <p>2.9 The EZ sites have a strong, complementary industrial focus which build on Lancashire’s national and international strengths. Indeed, Lancashire’s aerospace & supply chain industry already employs more than 30,000 people, representing the single largest concentration of aerospace activity in the UK, while North West England is rated as the fourth-largest aerospace cluster globally.</p> <p>2.10 In terms of the Warton, this is the UKs only private fast-jet testing facility and recently the added the new state-of-the-art £2.3m Training and Simulation Integration Facility (TSIF). This was developed in collaboration with Williams Advanced Engineering. The TSIF forms part of a wider investment in training from BAE Systems with more than £10m investment in training and simulation facilities at its Warton site.</p> <p>2.11 Other occupiers include global management consultancy Accenture and worldwide specialists in calibration and asset management services, Trescal, which works in industries such as aerospace, automotive and defence.</p> <p>2.12 Much of the early investment in the original Lancashire’s Advanced Manufacturing and Engineering Enterprise Zone was focussed on Samlesbury; including a new access from the A59 to the BAE Academy for Skills and Knowledge Training Centre and Wincanton Defence Logistics Facility. Recently, a £9.5 million public/private investment in an open access 5G industrial testbed called the 5G-Factory of the Future programme was announced. This is due to bolster the North-West’s reputation as an area of innovation and expertise. The</p>

Respondent	Text of Representations																																
	<p>Advanced Manufacturing Research Centre (AMRC) is a part of a consortium that includes: BAE Systems; IBM; Three (the telecoms and private 5G network provider); MTT (an SME developer of digitalisation technologies for machine tools, based in Burnley) and Miralis (a Lancashire based data-driven logistics specialist). The AMRC is expected to be fully operational on the site by the end of 2020.</p> <p>Warton Strategic Location for Development</p> <p>2.13 Warton was designated as one of 4 Strategic Locations for Development within the adopted 'Fylde Local Plan to 2032', mainly due to the presence of the Enterprise Zone and BAE Systems complex, combined with a relative lack of physical constraints.</p> <p>2.14 Accordingly, Policy SL3 included 8 allocations within Warton in a range of sizes (from 16 dwellings up to 360) with a total capacity of 1,305 dwellings. All of these now have planning permission with the majority under construction or with an end user confirmed. These have been supplemented by a number of smaller windfall developments in recent years.</p> <p>Housing Supply and Delivery in Warton</p> <p>2.15 The latest five year housing supply position in Warton is set out in the Council's Annual Position Statement (APS) which was issued for consultation in June 2020 before submission to PINs and is summarised below, supplemented with our latest understanding in the comments section.</p> <p>2.16 This Draft APS document is an update of the 2019 APS which was approved on 6th May 2020 (following a successful High Court challenge by the Council), confirming that Fylde could demonstrate a 5.1 year supply of deliverable housing sites at 1st April 2019.</p> <table border="1" data-bbox="465 820 2132 1415"> <thead> <tr> <th data-bbox="472 820 719 995">Site name</th> <th data-bbox="719 820 862 995">Site allocation</th> <th data-bbox="862 820 1010 995">HLAS site ref</th> <th data-bbox="1010 820 1200 995">Planning Application No</th> <th data-bbox="1200 820 1368 995">No. consented</th> <th data-bbox="1368 820 1518 995">Comp to date</th> <th data-bbox="1518 820 1686 995">Due in next 5 years</th> <th data-bbox="1686 820 2125 995">Comments</th> </tr> </thead> <tbody> <tr> <td colspan="8" data-bbox="472 995 2125 1066">Allocations</td> </tr> <tr> <td data-bbox="472 1066 719 1241">Blackfield End Farm (North/ East of Church Road)</td> <td data-bbox="719 1066 862 1241">HSS2</td> <td data-bbox="862 1066 1010 1241">2A1020</td> <td data-bbox="1010 1066 1200 1241">13/674 OL 17/129 RM</td> <td data-bbox="1200 1066 1368 1241">170</td> <td data-bbox="1368 1066 1518 1241">31</td> <td data-bbox="1518 1066 1686 1241">139</td> <td data-bbox="1686 1066 2125 1241">Local Plan allocated site. Full planning permission for whole site, delivery commenced by Miller Homes, with completions.</td> </tr> <tr> <td data-bbox="472 1241 719 1415">Blackfield End Farm (South/West of Church Road)</td> <td data-bbox="719 1241 862 1415">HSS2</td> <td data-bbox="862 1241 1010 1415"></td> <td data-bbox="1010 1241 1200 1415">13/0674 OL 18/0568 RM</td> <td data-bbox="1200 1241 1368 1415">164</td> <td data-bbox="1368 1241 1518 1415">0</td> <td data-bbox="1518 1241 1686 1415">150</td> <td data-bbox="1686 1241 2125 1415">Local Plan allocated site. Full planning permission for whole site, construction commenced by Stewart Milne 2018-19, first</td> </tr> </tbody> </table>	Site name	Site allocation	HLAS site ref	Planning Application No	No. consented	Comp to date	Due in next 5 years	Comments	Allocations								Blackfield End Farm (North/ East of Church Road)	HSS2	2A1020	13/674 OL 17/129 RM	170	31	139	Local Plan allocated site. Full planning permission for whole site, delivery commenced by Miller Homes, with completions.	Blackfield End Farm (South/West of Church Road)	HSS2		13/0674 OL 18/0568 RM	164	0	150	Local Plan allocated site. Full planning permission for whole site, construction commenced by Stewart Milne 2018-19, first
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Respondent	Text of Representations							
				19/0636 FULL				completions expected to be recorded in early 2020-21, SM website shows 11 finished homes released and available June 2020.
	Highgate Park	HSS7	2A879	13/0674 OL 18/0568 RM 19/0636 FULL	254	184	70	Local Plan allocated site. Full planning permission for remaining dwellings, Barratt on site. Delivery shown at standard rate (30 dpa) but this is below the rate of delivery achieved last year (51).
	Riversleigh Farm	HS24	2A985	12/0550 OL 13/0786 RM 15/706 RM	82	82	0	Completed
	Nine Acres Nursery/ Meadows View	HS25	2A765	13/0526 FULL	75	75	0	Completed
	George's Garage	S26	2A955	10/0766 OL 11/0816 RM	7	7	0	Completed
	Oaklands Caravan Park	HS27		14/0833 FULL 15/0187 FULL 16/0986 FULL 13/0562 OL	53	0	0	Likely to remain in use as a caravan park with residential permissions unimplemented

Respondent	Text of Representations							
				17/0047 FULL 17/0383 FULL 17/0765 FULL				
	Land North of Freckleton Bypass	HSS12		15/194 OL 20/0042	350	0	120	Local Plan allocation. Outline planning for 350 dwellings. Reserved matters app received 24/1/2020 for 350 dwellings for Countryside Properties; also full planning application received 31/1/2020 for additional 14 dwellings. Delivery rate is in line with earlier projections for the site, already reduced to recognise there would be a single developer; however Countryside Properties known to have higher delivery rates, so figure shown is considered very conservative.
	Clifton House Farm	HSS13		14/0410 OL 17/0851 VOC 19/0195 VOC 19/0908 20/0042 RM 20/0057 FULL	96	0	75	Local Plan allocated site. Full planning permission (reserved matters approval granted 23/3/2020). Delivery rates adjusted in accordance with pre-consultation engagement from promoter, reflecting impact of COVID-19. Promoter now in advanced discussions with housebuilder.

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	Windfall sites							
	Brook Mount, 4 Lytham Road, Warton			19/0541 FULL	0	0	26	Windfall site, previously-developed land within settlement, identified on brownfield land register. Full planning application received 2/7/2019. Not yet consented.
	Great Carr Side Farm, Wrea Brook Lane, Warton		2A885	15/0562 OL 17/1050 19/0926 RM	3	0	3	Small site with full planning permission
	Warton Hall Farm, Lodge Lane, Warton		2A952	14/0669	-1	0	-1	Anticipated loss
	Barn, Warton Hall Farm, Lodge Lane, Warton		2A951	14/0590	1	0	1	Small site with full planning permission
	Rose Cottage, Bryning Lane, Warton		2A1131	17/0031 FULL	1	0	1	Small site with full planning permission
	121-123 Lytham Road, Warton			18/0001 FULL	1	0	1	Small site with full planning permission
	206-208 Lytham Road, Bryning with Warton			19/587	1	0	1	Small site with full planning permission

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	Sykes Hall Farm, 99 Church Road, Warton			19/847	1	0	1	Small site with full planning permission
	TOTAL				1,258	379	587	
<p>2.17 The table above shows that 1,258 dwellings have been consented in Warton, which is 96% of the total capacity allocated in the adopted plan, with 12 years of the plan period remaining. Of those 1,258 a total of 379 (30%) have been completed with a further 587 (47%) due for completion in the next 5 years, leaving just 292 dwellings (23%) to be delivered in the final 7 years of the plan period.</p> <p>2.18 This drop off in supply in Warton towards the end of the plan period can be seen in the Council’s full plan trajectory which suggests average annual delivery rates of 112 dpa between 2020 and 2027, then just 26.4 from 2027 to 2032.</p> <p>2.19 This trend of dwindling supply towards the latter stages of the plan period is also evident across the Borough as a whole and we revisit this in section 6.</p> <p>Summary</p> <p>2.20 Overall, this demonstrates that Warton is a strong market location that is delivering housing across a range of sites, which is expected to continue at an elevated rate in the coming years. As such it is considered a suitable location to allocate further land, particularly given supply is likely to dip towards the latter stages of the plan period.</p> <p>2.21 The land at Clifton House Farm Phase 2 represents the next logical location for growth in Warton by rounding off the west of the settlement, and can also serve those longer term supply needs towards the latter stages of the current plan period (2026 onwards), when Clifton House Farm Phase 1 and Blackfield End Farm are due to be complete.</p> <p>3. PROPOSED DEVELOPMENT</p> <p>3.1 Hallam are still in control of the 9.66 Ha of unallocated land at Clifton House Farm. This lies outside the existing settlement boundary, with 3.76 Ha falling within the Green Belt; however the remaining 5.9 Ha is within the open countryside and represents an obvious and highly sustainable opportunity for rounding off the settlement, infilling the gap between the two existing allocations at Clifton House Farm and Blackfield End Farm, as highlighted below.</p> <p style="text-align: center;">[policies map extract follows: see the original representations within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p>								

Respondent	Text of Representations
	<p>3.2 Hereafter this land is referred to as ‘Clifton House Farm (CHF) Phase 2’, and is highlighted red on Figure 3.2 over the page, with the grey line showing HLMs full historic ownership as well as adjacent committed and completed schemes, as well as the route of a potential link road through the site.</p> <p>3.3 The site has capacity to provide 175 - 200 residential dwellings, based on standard net density of 30 – 35 dph, which can be delivered with minimal environmental or amenity impacts. It provides an obvious location for growth in Warton by rounding off the west of the settlement, with minimal impacts. It also offers the potential for significant infrastructure improvements; with the ability to provide a link road across the west of Warton between Lytham Road and Church Road, through the existing committed developments at Clifton House Farm and Blackfield End Farm.</p> <p style="padding-left: 40px;">[“concept masterplan” follows: see the original representations within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>3.4 The link road is a real and deliverable prospect as it has been factored into both the outline and Reserved Matters approvals for:</p> <ul style="list-style-type: none"> • Clifton House Farm (Phase 1) – Reserved Matters was approved on 20th March 2020 (Ref: 19/0926) for 96 dwellings. Approved layout (Ref: 1324-PL-01 Rev F) shows a spine road from Lytham Road running north right up to the boundary with CHF 2, and is attached at Appendix 2. • Blackfield End Farm – Reserved Matters was approved on 7th November 2018 (Ref: 18/0586). Approved layout (Ref: SK275/PL/101 Rev F) shows a spine road running from Church Road south west right up to western boundary with CHF2, and is attached at Appendix 3. <p>3.5 Extracts of these plans are also shown below with the connection points to CHF 2 highlighted.</p> <p style="padding-left: 40px;">[approved site layout plans for the two sites follow: see the original representations within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>Historic Assessment of Clifton House Farm Phase 2</p> <p>3.6 Given the narrow scope of this Local Plan Review, which we address in more detail in sections 4-6, there is no up to date assessment of sites in the evidence base, as the Sustainability Appraisal does not consider sites and there is no supporting Site Assessment Paper or SHLAA.</p> <p>3.7 As such, the most recent evidence on sites is that which supported the adopted plan, and this assessment did consider the land at CHF Phase 2. Indeed, it was assessed alongside Clifton House Farm Phase 1/ Allocation HSS13, under Strategic Site H8 in the original Preferred Options Local Plan (2015), and was assessed as part of the 2013 SA relevant at the time. It was deemed to be a suitable, available and deliverable site for housing development.</p> <p>3.8 Strategic Site H8 was also assessed more thoroughly within the Strategic Site Assessment (Council document reference ED028 a-g), in December 2015. Within this assessment it achieved a score of 137, which ranked equal 10th out the 31 sites assessed, and joint second for</p>

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	<p>sites in Warton, behind the Highgate Park site, which is a brownfield former employment site, and joint with site H11 to the north east of Warton, which has not been allocated or promoted for development. The overall assessment table and associated map from ED028b is attached at Appendix 4 and extracts are also provided below for ease of reference.</p> <p>3.9 This clearly demonstrates that Site H8, which was only been part allocated for residential development (CHF Phase 1), was considered more sustainable than 10 other sites that were allocated for residential development (8 in full and 2 in part).</p> <p style="padding-left: 40px;">[site assessment table for Warton and map from the Strategic Site Assessment 2015 follow: see the original representations within the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)]</p> <p>3.10 Therefore, the evidence suggests that this additional 5.9 hectares in H8 should have been allocated in the adopted plan as it is available and was actively promoted through the Local plan process, and even incorporated into a wider masterplan for Warton (attached at Appendix 5), with a coordinated approach to transport connectivity and green infrastructure in line with the Council’s adopted Policy M1 (Masterplanning the Strategic Locations for Development).</p> <p>3.11 Accordingly, this land should be considered for allocation in the Local Plan Review as it is a demonstrably sustainable site in the Council’s own evidence, will round off the settlement, will meet the longer term housing needs after 2026 and can deliver a new link road between Lytham Road and Church Road; which can be considered the final piece of the jigsaw for delivering masterplanned and coordinated growth for Warton.</p> <p>Additional Allocations</p> <p>6.19 Based on above housing need and supply analysis, there is an urgent need for Fylde to allocate additional land for up to 2,150 dwellings to meet supply shortfalls from as early as 2022, if the government’s revised standard method is brought into force.</p> <p>6.20 Given Warton’s existing designation as a Strategic Location for Development, with its Enterprise Zone, and the fact that delivery on existing allocations is due to reduce beyond 2026 (see section 2), it is an obvious location for further allocations.</p> <p>6.21 This is further reinforced by the recent White Paper with Warton representing an obvious ‘growth’ area, where further sustainable residential sites adjacent to the existing settlement would expect to receive automatic outline consent.</p> <p>6.22 Within the context of Warton, the land at Clifton House Farm Phase 2 represents the next logical location for growth, as it will round off the settlement, and will also meet longer term housing needs after 2026, as this is when the two adjacent sites at Clifton House Farm (Phase 1) and Blackfield End Farm are due for completion, thus ensuring a continued delivery pipeline to the west of Warton.</p> <p>6.23 Finally, CHF 2 offers the potential for significant infrastructure improvements; with the ability to provide a link road across the west of Warton between Lytham Road and Church Road, through the existing committed developments (CHF1 and Blackfield End Farm).</p>

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	<p>8. CONCLUSIONS</p> <p>8.1 This representation has demonstrated that Phase 2 of Clifton House Farm is an available, suitable and deliverable site to the west of Warton which will round off the settlement and has the opportunity to provide significant infrastructure benefits to the wider settlement through the provision of a link road.</p> <p>8.10 In terms of the distribution of the emerging housing requirement and new allocations, it is our view that growth should be focussed on allocations in the existing main settlements and strategic locations for development such as Warton.</p> <p>8.11 Within Warton, Clifton House Farm Phase becomes the next obvious choice for allocation, given it scores well in the sustainability appraisal and the potential link road.</p> <p>8.12 In light of the above, we respectfully request that the Council considers this site for allocation in the emerging Local Plan and ensure the site is objectively assessed in any future evidence base review accordingly.</p>
FLP32 Policy GD7	
Pegasus Group for Hallam Land Management Ltd	<p>Policy GD 7: Achieving Good Design in Development – We do not raise any issues with the proposed revisions in respect of the 2019 NPPF, but would highlight some potential suggested in the government’s White Paper, where design is prioritised under “Pillar Two - Planning for beautiful and sustainable places’. The government hope to deliver this through a ‘National Model Design Code’ based on last year’s National Design Guide, to be published later this year (alongside an updated Manual for Streets), which will then be used as a template for establishing site specific design codes or ‘pattern books’ in Growth Areas as part of the permission in principle process. We are supportive of this aspiration in principle, but would stress that such Design Codes would need to be agreed at the Local Plan stage, and considered at the earliest possible stage in that process, to give developers both the certainty and time to develop detailed proposals, and the ability to engage and influence this process to ensure deliverability. Agreement at the outset, will also avoid further supplementary Local Plan processes to establish Masterplans/ SPDs etc, as these inevitably lead to delays in delivery. They will also need to include a level of flexibility and a review mechanism, should there be a change in circumstances, local vernacular, viability or national policy.</p>
FLP32 Policy H2	
Smith & Love for Applethwaite Homes	<p>This representation is submitted on behalf of our client Applethwaite Ltd in response to the Partial Review of the Fylde Local Plan to 2032 which was published for consultation between July and September 2020.</p> <p>Omission from the Schedule of Revisions:</p>

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	<p>Policy H2 - Density and mix of new residential development</p> <p>Applethwaite is specialist developer of exclusively age-restricted general market bungalow schemes of between 20 no. and 50 no. units for retired and older people over the age of 55. The purpose of the Partial Review is to ensure that the Local Plan conforms to and is consistent with national planning policy set out in the 2019 NPPF. Applethwaite therefore considers that Part Three of Policy H2 which concerns specialist accommodation for the elderly must be included in the schedule of proposed revisions and objects to its present omission.</p> <p>The section of Part Three of Policy H2 which must be reviewed, is that which sets out the Council’s definition of the type/s of development which it considers will qualify as ‘purpose built 100% specialist accommodation for the elderly’. The present policy text is;</p> <p><i>Developments will be considered by the Council to be purpose-built 100% specialist accommodation for the elderly if:</i></p> <ul style="list-style-type: none"> ○ <i>All areas used by residents will comply with optional technical standard M4(3(2a)) (wheelchair-adaptable dwellings);</i> ○ <i>A communal lounge or similar social facility for the exclusive use of all residents is included within the development;</i> ○ <i>A shared laundry service is provided for the use of all residents;</i> ○ <i>The development will be marketed with a restriction on age for residents of over 55;</i> ○ <i>A daily hot meals service is provided either through a central facility on-site or through an outside provider to residents who require it; and</i> ○ <i>An emergency alarm call service is provided for all residents.</i> <p>Other than the requirement for a proposed development ‘to be marketed with a restriction on age for residents of over 55’, none of the defining criteria set by the Council in Policy H2 are consistent with up to date national policy concerning the provision and types of specialist housing for older people set out in the 2019 NPPF and planning practice guidance.</p> <p>The 2019 NPPF glossary defines ‘older people’ as;</p> <p><i>Older people: People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.</i></p> <p>The planning practice guidance explains that many different types of specialist housing are needed to meet the diverse needs of older people. It lists four of the main different types of specialist housing, as follows, as an indication of what is available but it is not definitive:</p> <ul style="list-style-type: none"> • Age-restricted general market housing [and bungalows]: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services. • Retirement living or sheltered housing: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.

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	<ul style="list-style-type: none"> • Extra care housing or housing-with-care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying • Residential care homes and nursing homes: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes. <p>Consequently, there is no longer any justification and scope for the Council to set its own alternative definition of the types of development which it considers qualify as purpose-built 100% specialist accommodation for the elderly. The present policy text is different to, and significantly much narrower than, the 2019 NPPF glossary definition of older people and the planning practice guidance definition of the different types of specialist housing for older people, and we consider it must therefore be deleted in full as part of the Partial Review of the Local Plan.</p> <p>If the Council considers it is necessary to replace the deleted text with alternative wording we consider it should be revised as follows;</p> <p><i>Developments will be considered by the Council to be purpose-built 100% specialist accommodation for the elderly if: <u>they are consistent with the types of accommodation indicated in the planning practice guidance (paragraph: 010 reference ID: 63-010-20190626), although these are not definitive as there is a significant amount of variability in the types of specialist housing for older people.</u></i></p> <ul style="list-style-type: none"> • All areas used by residents will comply with optional technical standard M4(3(2a)) (wheelchair-adaptable dwellings); • A communal lounge or similar social facility for the exclusive use of all residents is included within the development; • A shared laundry service is provided for the use of all residents; • The development will be marketed with a restriction on age for residents of over 55; • A daily hot meals service is provided either through a central facility on-site or through an outside provider to residents who require it; and • An emergency alarm call service is provided for all residents. <p>The justification supporting text to Policy H2 relating to specialist accommodation for the elderly adds;</p> <p><i>9.45 People will choose accommodation based on their own individual preferences, subject to their own budgets, and this applies equally to those who have retired as to any others. The accommodation currently inhabited by the elderly in Fylde will reflect these preferences, but will also reflect supply constraints. The provision of a greater supply of accommodation that</i></p>

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	<p><i>better reflects the needs and aspirations of retired people is desirable on the grounds of general health and wellbeing for the population, and may release accommodation more suitable for other age groups back into the market.</i></p> <p>9.46 <i>In order that new developments provide for the housing needs of Fylde, it is important that accommodation purportedly designed for the elderly genuinely provides for their needs. Accordingly, the Council will classify developments as purpose-built for the elderly providing it meets a series of requirements set out in the policy.</i></p> <p>To reflect the revisions which are necessary to the wording of Policy H2 by reference to the types and range of specialist housing for older people as defined in the 2019 NPPF glossary and planning practice guidance, we suggest that the supporting text is revised as follows;</p> <p>9.45 <i>People will choose accommodation based on their own individual preferences, subject to their own budgets, and this applies equally to those who have retired as to any others. The accommodation currently inhabited by <u>retired and older people</u> the elderly in Fylde will reflect these preferences, but will also reflect supply constraints. The provision of a greater supply <u>and wider choice and range</u> of accommodation that better reflects the needs and aspirations of retired <u>and older people</u> is desirable on the grounds of general health and wellbeing for the population, and may <u>will help to</u> release accommodation more suitable for other age groups back into the market. <u>This includes age-restricted general market housing and bungalows; retirement living or sheltered housing; extra-care housing or housing-with-care, and residential care homes and nursing homes.</u></i></p> <p>9.46 <i>In order that new developments provide for the housing needs of Fylde, it is important that accommodation purportedly designed for the elderly genuinely provides for their needs. Accordingly, the Council will classify developments as purpose-built for the elderly providing it meets a series of requirements set out in the policy <u>they are consistent with the types of accommodation indicated in the planning practice guidance (paragraph: 010 reference ID: 63-010-20190626), although these are not definitive as there is a significant amount of variability in the types of specialist housing for older people.</u></i></p> <p>We trust that these representations will be taken into account and please contact us if you have any queries or we can provide further assistance.</p> <p>Please note that Applethwaite may wish to participate at the examination hearing sessions and we would like to be notified when the Partial Review is submitted to the Secretary of State and kept informed of the subsequent programme.</p>
FLP32 paragraph 12.11	
Marine Management Organisation	<p>Thanks for the opportunity to respond to the Partial Review of the Fylde Local Plan to 2032.</p> <p>I note that you mention that this is not a complete review of the Local Plan. Is there any space to update the paragraph relating to the Marine Management Organisation and Marine Plans?</p>

Respondent	Text of Representations
	<p>If yes, there are part of paragraph 12.11 which could be updated:</p> <p>The Marine Management Organisation (MMO) was established following the Marine and Coastal Access Act 2009. As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. The EU Directive on marine spatial planning (2014/89/EU) requires marine spatial plans to be in place before 31 March 2021. At its landward extent, a marine plan will apply up to the mean high water mark, which includes the tidal extent of any rivers. Marine plans are being developed on a rolling programme, with the first plan (East Inshore and East Offshore) adopted on 2 April 2014 and the South Inshore and South Offshore Plan adopted on 17 July 2018.s currently being developed. The Draft North West Inshore and North West Offshore Marine Plan, which includes Fylde, is now a material consideration. This plan will be delivered by 2021, with a 20 year view of activities. Each plan will be monitored with three yearly reviews. The Government designated the Fylde Marine Conservation Zone on 12 December 2013. The Conservation Zone was designated to conserve the marine habitat in the sub-tidal sand. The Explore Marine Plans Marine Information System https://explore-marine-plans.marineservices.org.uk is a dedicated interactive website that brings adopted and consultation draft marine plans, their policies, supporting data evidence base and information together in one place.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the UK Marine Policy Statement (MPS), unless relevant considerations indicate otherwise. The Draft North West Inshore and North West Offshore Marine Plan is now a material consideration. As with terrestrial local plans, weighting of draft marine plan policies is covered by paragraph 48 of the National Planning Policy Framework 2019 (NPPF).</p> <p>I understand if not possible for this review, but this could be a good opportunity to include the draft North West Marine Plan, particularly as it is now a material consideration.</p>



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Authorised by: Julie Glaister, Planning Policy Manager