



Partial Review of the Fylde Local Plan to 2032

**Summary of Responses to the
Main Modifications Consultation**

September 2021

The Inspector examines the Partial Review of the Local Plan (the Partial Review) as submitted by the Council. However, there are further opportunities to make changes during the Examination process, before the Local Plan is adopted. Under Section 20(7) of the Planning and Compulsory Purchase Act (2004), as revised by Section 112 of the Localism Act (2011) modifications are either classified as "main" or "additional" modifications.

“Main Modifications” are required to resolve issues in order to make the Partial Review sound (paragraph 35 of the Framework) or to ensure its legal compliance. They involve changes or insertions to policies and text that are essential to enable the Plan to be adopted. Main Modifications are therefore significant changes that have an impact on the implementation of a policy.

“Additional Modifications” are of a more minor nature and do not materially affect the policies set out in the Fylde Local Plan. Additional modifications mainly relate to points where a need has been identified to clarify the text, include updated facts, or make typographical or grammatical revisions which improve the readability.

Consultation on the Main Modifications proposed by the Council took place between 29th July 2021 and 9th September 2021.

All bodies and individuals on the Planning Policy consultation database were consulted.

Responses were received from 17 consultees. The responses are summarised in this document, divided according to the main modification to which it relates. The main modifications are in plan order. Responses that do not relate to any particular modification or section of the plan are at the beginning. The responses provided here should be read in conjunction with the Schedule of Proposed Main Modifications (EL5.002).

The original representations in their complete form are provided separately in the Copies of Representations Made to the Main Modifications Consultation.

List of Representors

Ref	Representor	Main Modification
1	Mr H Beaton	General comment
2	Highways England	General comment
3	Historic England	General comment
4	The Coal Authority	General comment
5	West Lancashire Borough Council	General comment
6	Lancashire County Council	MM2, MM5, MM6
6	Highways England	General comment
7	Homes England	General comment
8	Turley on behalf of Strategic Land Group	MM5, MM6
9	Home Builders Federation (HBF)	MM1, MM2, MM5, MM6
10	Lichfields on behalf of Taylor Wimpey	MM1, MM2, MM5, MM6, MM7, MM8
11	Gladman	MM1, MM2, MM3, MM6
12	Cassidy and Ashton	MM1
13	Emery Planning on behalf of Wainhomes	MM1, MM2, MM5, MM6
14	Ministry of Defence	General comment
15	Story Homes	MM1, MM5, MM6
16	Natural England	General comment
17	Treales, Roseacre and Wharles Parish Council	General comment, MM3

General comments not relating to a modification or policy directly	
Representor	Summary of representation
1 Mr. H. Beaton	<p>Taking a count of the housing developments around the Fylde and the additional infrastructure that is also required, Road net work improvements as areas get grid locked for residents. Additional schools, as well as child care nurseries, doctor surgery, dentistry, safe areas - play parks for children around these new development, local amenities etc.</p> <p>Then the additional issue with water, rain water and wastewater. As some of these system have been in place for many years and are not suitable or able to deal with the extra demands, Flooding, burst mains water, as well as other systems struggling to cope with demands. Plus the improvements in other Infrastructures to take account of these area changes.</p> <p>Improvements of the infrastructure must be categorised as a priority in the first instance so its easier to develop for the future. Not the other way around, as one can not rely on developers, been here and seen it first hand.</p> <p>We have to learn from the past issues, I believe we in the UK have to look at other countries in Europe (Sweden, Germany & others). That put an emphasis on planning ahead and getting the best Infrastructures in place.</p> <p>We within Britain are slow to make improvements IT/Internet is a prime example of this, as well as Ground heating system in new housing development areas, all for an improved environment and environmentally for the future.</p> <p>Hopefully you see that I have been constructive about these present issues and difficulties. Maybe you can take some of these onboard and continue to work together to make sure the improvements are worthwhile for all our sakes.</p>
2 Highways England	<p>We note that the Review centres on achieving housing OAN, and note that Fylde Council have sought to accommodate the unmet need of the adjoining Wyre district. These are Planning, rather than Highway, matters and as such we offer no comment as to the acceptability of this in Planning terms. On the basis that the new proposed Fylde OAN would be broadly similar to the original figure upon adoption of the current Plan, and that this does not result in the allocation of additional residential sites, there are no representations that we would wish to make.</p>
3 Historic England	<p>At this stage we have no comments to make on its content.</p>
4 The Coal Authority	<p>As you are aware, Fylde Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p>
5 West Lancashire Borough Council	<p>This is to confirm that this Council has no comments to make on the Modifications, other than to note them.</p>

7 Homes England	Homes England does not wish to make any representations on the Modifications Consultation. We will however continue to engage with you as appropriate.
14 Ministry of Defence	With regard to the current proposal of the Fylde Borough Council, the MOD have no concerns to the Local Plan to 2032 Schedule of Proposed Main Modifications and Schedule of Proposed Main Modifications for Consultation; Sustainability Appraisal Addendum – Main Modifications; Addendum Report Economic Viability Assessment Review
16 Natural England	Natural England has no objection to the Draft Schedule of Proposed Main Modifications and we concur with the conclusions of the Sustainability Appraisal Addendum Main Modifications Report.
17 Treales, Roseacre and Wharles Parish Council	The PC continues to request that additional definitions are provided in the Fylde Planning Glossary to clarify definitions of terms not already provided in the Glossary of the current NPPF. We are happy to engage with the Planning Policy team and look forward to hearing from you shortly.

Main Modification MM1 Paragraphs 1.26 – 1.27	
Representor	Summary of Representation
9 Home Builders Federation (HBF)	Appropriate for the plan to ensure that it contributes to the issue of addressing unmet need in Wyre. Therefore, the amendment of this text to address this issue is appropriate; remains concerned that the housing requirement is not sufficient and should be increased; and does not consider this element of the amendment to be sound.
10 Lichfields on behalf of Taylor Wimpey	<p>Taylor Wimpey objects to the above main modifications [includes MM2]; Partial Review undertaken because the adopted Local Plan [§1.27] commits to an early review to examine the issue of unmet need in Wyre, if Wyre’s Local Plan is adopted with unmet need. Whilst shortfall from adopted Wyre Local Plan appears to have been addressed, Policy LPR1 requires that Wyre Council undertakes a partial review including update of housing needs.</p> <p>Wyre Council commenced consultation on scope in February 2020 (Regulation 18); remains at a very early stage of preparation; not yet clear what housing requirement figure Wyre Council will pursue, whether Wyre will be capable of meeting its own needs. As Wyre’s housing requirement has yet to be confirmed, not possible to confirm whether the inclusion of the shortfall from Wyre’s adopted Local Plan in the Fylde Local Plan Partial Review will be sufficient. We consider that this matter should be addressed within the Fylde Local Plan Partial Review prior to adoption, as a failure to properly accommodate any shortfall from Wyre would nullify one of the key objectives of the Partial Review.</p>
11 Gladman	Modification relates to the unmet housing needs identified in the current, adopted Wyre Local Plan; Gladman do not consider the Council’s approach to be positively prepared, effective or consistent with national policy in addressing the issue of unmet housing need in Wyre. In

	<p>this regard, we believe that further measures need to be put in place to address the issue of unmet housing need between Fylde and Wyre [quotes Wyre’s reg 19 response]; key driver for review process was need to assess issue of unmet housing needs; Fylde acting prematurely, as unmet needs of Wyre have yet to be identified; clear disconnect between the two Local Plans; question whether this is an appropriate time to progress the Local Plan Review; still no clarity from either Council; no assurances that the figure being currently planned for will meet the needs of Wyre; will simply prompt further review if Wyre are unable to meet needs; risks the same situation that arose through the preparation of the Councils’ current Local Plans; Fylde could have waited for Wyre’s position to be confirmed, and still completed a Local Plan review within five years of adoption. At very least the main modifications must contain a mechanism to commence a further Local Plan review in the event that a housing shortfall is subsequently identified by Wyre.</p>
<p>12 Cassidy and Ashton</p>	<p>...41 of the policies from the Adopted Plan were not part of the Partial Review; none of the allocations were; have been significant changes in respect to these allocations, for example progress with the Blackpool Airport Enterprise Zone. Framework states that policies in Local Plans should be reviewed to assess whether they need updating at least once every five years: vast majority of policies have already not been reviewed for three years; Council will be required to review remaining 41 policies within a further two years at the most; sensible approach would be to undertake a Full Review of the Local Plan; given the length of time such reviews can take, should be commenced in 2022; for purposes of clarity and openness, it would be appropriate to make reference in the Plan: an additional paragraph should be inserted after para. 1.27 to say:</p> <p style="text-align: center;"><i>“National planning guidance requires that policies in Local Plans should be reviewed at least every five years. This Partial Review was undertaken only in respect to 9 of the adopted policies, leaving 41 policies that were not the subject of the review. In order to ensure that the Council complies with the requirements for reviewing local plan policies, a Full Review of the Local Plan will commence in 2022 to allow sufficient time for that review to have taken place prior to the five year requirement set out in national planning guidance.”</i></p>
<p>13. Emery Planning on behalf of Wainhomes</p>	<p>2.1 MM1 relates to the housing requirement in Policy DLF1 and Policy H1, therefore we set out our position under MM6 and the consequence of our position is that MM1 should be amended as follows.</p> <p>1.26 ... <i>the new housing requirement of 305 445 dwellings per annum</i></p>
<p>15 Story Homes</p>	<p>Story Homes did not attend the Examination in Public and whilst the Inspector has made recommendations on this point wish to place on record their objection to the use of the reduced housing figure of 7,275 and contend that the local plan figure of 8,715 dwellings should be used; contend that the use of the reduced figure has been used to maintain a five-year housing land supply; does not seek to boost significantly housing supply in line with the NPPF.</p> <p>Paragraph 62 of NPPF states that local authorities should reflect the needs of different groups in planning policies including those who require affordable housing; reduction in the housing requirement will have implications for the ability to deliver affordable housing; should be reconsidered.</p>

Main Modification MM2: Policy DLF1 Development Locations for Fylde	
Representor	Summary of Representation
6 Lancashire County Council	<p>Lancashire County Council have noted that the Partial Review of the Fylde Local Plan has incorporated alterations to its strategic policies DLF1 and H1 and to supporting text, to the housing needs and requirement figures, and to the performance monitoring framework, following consideration of the issue of housing needs in Wyre. We will work closely with Wyre Borough Council when they advise that a review of their adopted plan will take place.</p> <p>[Remainder of response raises questions about which housing figures to base school planning assessments on, and produces updated projections for school place requirements based on the data in the Annual Position Statement. The Council welcomes the response and is corresponding with LCC to clarify the latest known position]</p>
9 HBF	<p>The amendment to remove the range of the housing requirement is appropriate and adds clarity to the policy. However, the HBF does not consider that the housing requirement is sound and considers that the housing requirement should be increased; the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure; Government is committed to ensuring that more homes are built, 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. PPG (PPG ID: 2a-010-20190220) 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>Whilst the housing requirement has been increased above the minimum LHN identified by the standard method in order to meet the unmet demand from Wyre it has not been increased any further to account for other elements of increased need and demand, identified by the high levels of delivery since 2016, the SHMA and the more recent household projections.</p>
10 Lichfields on behalf of Taylor Wimpey	<p>Taylor Wimpey objects to the above main modifications [includes MM2] which relate to the proposed minimum requirement of 415 net homes per annum for the period 2011-2019 and a minimum housing requirement of 305 net homes per annum for the period 2019-2032 (7,275 net dwellings for the Plan period).</p> <p>[main comments shown under MM1 and MM6]</p>
11 Gladman	<p>In principle, Gladman support the fact that the housing requirement is considered as a minimum 7,275 rather than expressed as a range as this provides better clarification on what the housing requirement is; notwithstanding the above, 7,275 is an underrepresentation of housing needs; significant departure from adopted Local Plan requirement that was examined and found sound in September 2018; PPG (PPG ID: 2a-010 describes circumstances in which it may be appropriate to plan for a higher level of need: includes situations where</p>

	<p>previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. The PPG also makes clear that the Standard Method does not attempt to predict the impact that changing economic circumstances or other factors may have on demographic behaviour.</p> <p>Fylde should be planning for a higher level of housing need and an increased target. Factors include:</p> <ul style="list-style-type: none"> • SHMA Addendum 3 used a similar demographic starting point as the Council’s Standard Method figure (274 v 275 dpa respectively) but reasoned that there was a need to plan for 410 – 430 dpa in order to meet the borough’s economic needs and support likely job growth; • Whilst the Council’s Housing Needs and Requirement Background Paper (EDPR04) makes comparisons between the affordability uplift included in the current Standard Method calculation and the Council’s earlier SHMA work, we do not believe that this is a direct replacement for economic uplifts, or that the authority has provided an adequate explanation for departing from its previous economic projections of need and how they could affect the borough’s economy; • The Council is still seeking to deliver a minimum of 60.6ha of employment land, consistent with the adopted Local Plan employment land requirement; housing requirement was informed by economic projections that suggested a range of 410-430dpa; based on an independent assessment which considered future level of job growth in Fylde would lie in the range of 55 to 91 jobs per annum and concluded that “on balance, it is considered that the likely level of employment growth will be at the upper end of the range.”; • employment land provision remains the same, unclear what the reduction in housing numbers will mean for the borough’s employment prospects; lower housing target likely to harm economic prospects especially in light of Covid-19 Pandemic; Council’s economic needs will not be met; important that the housing requirement is aligned with the Council’s ambitions for growth; • recent completions data provided in paragraph 4.5 of the Council’s 2020 APS (EL1.002b); totalled 463, 490 and 634 in 2017/18, 2018/19 and 2019/20 respectively, clear indication of true demand and need for additional housing in the borough; and • undermine the ability to meet Fylde’s affordable housing needs. Based on the Council’s adopted affordable housing percentage of 30%, it would only result in the delivery of 92 affordable dwellings per annum, which represents a significant reduction on the 125 affordable homes that would be provided under the Council’s current adopted target of 415 dpa. It could make it even more difficult to achieve the 249 affordable dwelling completions that required in the borough each year. <p>Gladman must maintain that there is strong case for increasing the proposed Fylde Local Plan Review housing requirement of 305 dpa, to take account of these factors.</p>
<p>13 Emery Planning on behalf of Wainhomes</p>	<p>3.1 MM2 relates to the housing requirement in Policy H1, therefore we set out our position on that under MM6 and the consequence of our position is that MM2 should be amended as follows.</p> <p><i>... a minimum of 7,275 9,095 new homes ...</i></p>

Main Modification MM3: Policy GD4 Development in the Countryside	
Representor	Summary of Representation
11 Gladman	MM3 relates to Policy GD4; Gladman do not consider that Policy GD4 allows for the necessary flexibility required by the NPPF and the need to respond to changing circumstances over the plan period (i.e. a shortfall in housing land supply). In essence, development outside of any defined settlement boundary will be treated as open countryside where development will generally be restricted and limited to a narrow set of circumstances as listed in MM3. Gladman consider that the Council's approach needs to be reworded to provide a more flexible approach which allows for development proposals that are well related to existing settlements to come forward in conformity with the requirements of the Presumption in Favour of Sustainable Development.
17 Treales, Roseacre and Wharles Parish Council	<p>The PC makes the following recommendations/requests.</p> <ol style="list-style-type: none"> 1. FLP32 GD4 (g) and NPPF Para 71 The PC believes that unacceptable ambiguities are generated by the use of similar but different words in attempting to summarise NPPF 19 Para 71 in the FLP32. In regulatory documents avoidance of repetition of points but using different words are understood to be deemed to be good practice for effective and efficient application. <p>To avoid the additional effort to assess and justify a course of action based on two interpretations, rather than just the statement in the NPPF 19 that it is proposed that the full text in NPPF Para 71 is used and further references made directly to the NPPF19. In addition, it is noted that "settlement" is not defined in and the NPPF footnote 33 makes specific reference to the size of a settlement. It is therefore proposed that it should refer to the adjacency to the settlement boundary and area within the settlement boundary. This will provide the necessary clarity applicable to the communities of the Fylde. The PC provides the text it considers reflects the above assessment below.</p> <p>Proposed text for GD4 g)</p> <p><i>g) Development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area.</i></p> <p><i>These sites should be on land which is not already allocated for housing and should:</i></p> <ol style="list-style-type: none"> <i>a) comprise of entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of this Framework; and</i> <i>b) be adjacent to existing designated boundaries of settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework as described in Footnote 34 of the NPPF19, and comply with any local design policies and standards. Entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the area within the existing designated settlement boundary.</i>

Main Modification MM4: Paragraph 7.14	
Representor	Summary of Representation
No comments made	

Main Modification MM5: Paragraphs 9.13- 9.14, 9.16-9.17 and 9.19	
Representor	Summary of Representation
6 Lancashire County Council	<p>The School Planning Team works closely with all Lancashire District Councils providing advice and guidance regarding the impact new housing will have on the provision of mainstream education. To enable us to forecast the five year position we rely on the district to provide detail of their five year housing land supply annually. This information is used alongside national statistics such as the birth rate to forecast the likely need for additional school places within a specific planning area.</p> <p>The partial review information provides headline figures of new planned housing; however it does not provide detail of the specific geographical planning areas nor where any potential unmet Wyre housing will be delivered. Until this detailed information is provided by Fylde of the changes in housing delivery and the specific school planning areas we cannot assess the full impact of the developments. Upon this information the School Planning Team will advise which specific school planning areas require further review and investment of additional pupil places. This level of detail can be applied to the district's Infrastructure Delivery Plan advising residents of the level of all infrastructure to meet the demand of new housing and will keep districts informed of pressure points for school places.</p> <p>At this moment in time paragraph 9.14 of the draft Schedule of Proposed Main Modifications for consultation states that: <i>'For the Local Plan, the Council determined the housing requirement for the 2011-2032 plan period to be 415 net dwellings per annum. For the Partial Review of the Fylde Local Plan to 2032, and the obligation to include the shortfall in Wyre, the Council has determined the housing requirement figure for the plan period to be 7,275 net dwellings. This is derived from an annual requirement of 415 net dwellings for the period 2011-2019 and 305 net dwellings per annum from 2019-20 onwards. This revised housing requirement takes account of the unmet need from the adopted Wyre Local Plan (2011-2031).'</i></p> <p>At paragraph 9.16 it states: <i>'The overall minimum housing requirement established through the Partial Review of the Fylde Local Plan to 2032 is 7,275 net dwellings for the Plan period. The Council has identified sufficient sites, including an allowance for small sites and windfalls, to provide a supply figure of 8,819 homes over the Plan period'</i>.</p> <p>I am unclear as to which number dwellings I should be basing my calculations on as above there is mention of 7,275 and 8,819 dwellings, but in document EDPR05 the total dwellings are 8,239. Please could I request clarification to allow me to provide feedback?</p> <p>[The Council is in correspondence with LCC to provide clarification and engage further on information provided]</p>

8 Turley on behalf of Strategic Land Group	[content set out under MM6 to avoid repetition]
9 HBF	<p>Amendment to remove the range of the housing requirement is appropriate and adds clarity to the policy. However, the HBF does not consider that the housing requirement is sound and considers that the housing requirement should be increased.</p> <p>Standard Method identifies minimum annual housing need figure, not a housing requirement figure; Government is committed to more homes built, 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. PPG (PPG ID: 2a-010-20190220) 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. Whilst the housing requirement has been increased to meet the unmet demand from Wyre it has not been increased any further to account for other elements of increased need and demand, identified by the high levels of delivery since 2016, the SHMA and the more recent household projections.</p>
10 Lichfield on behalf of Taylor Wimpey	<p>Taylor Wimpey objects to the above main modifications which relate to the proposed minimum requirement of 415 net homes per annum for the period 2011-2019 and a minimum housing requirement of 305 net homes per annum for the period 2019-2032 (7,275 net dwellings for the Plan period).</p> <p>[remainder shown under MM6 to avoid duplication]</p>
13. Emery Planning on behalf of Wainhomes	<p>4.1 MM5 relates to the housing requirement in Policy DLF1 and Policy H1, therefore we set out our full position on that under MM6 and the consequence of our position is that MM5 should be amended as follows.</p> <p><i>Therefore, the shortfall in Wyre identified in the Wyre Local Plan (2011-2031) of 380 dwellings, equivalent to 30 dwellings per annum for the period 2019-2032, is added to give a total of 305 445 dwellings per annum for the period 2019-2032.</i></p> <p>4.2 The figures in paragraphs 9.13 to 9.19 should reflect a housing requirement of 445 dwellings.</p>
15 Story Homes	<p>Story Homes did not attend the Examination in Public and whilst the Inspector has made recommendations on this point wish to place on record their objection to the use of the reduced housing figure of 7,275 and contend that the local plan figure of 8,715 dwellings should be used; contend that the use of the reduced figure has been used to maintain a five-year housing land supply; does not seek to boost significantly housing supply in line with the NPPF.</p> <p>Paragraph 62 of NPPF states that local authorities should reflect the needs of different groups in planning policies including those who require affordable housing; reduction in the housing requirement will have implications for the ability to deliver affordable housing; should be reconsidered.</p>

Main Modification MM6: Policy H1 Housing Delivery and Allocation of Housing Land	
Representor	Summary of Representation
6 Lancashire County Council	[Queries raised by LCC on which figures will reflect housing delivery for the purposes of school planning: see under MM5]
8 Turley on behalf of the Strategic Land Group	<p>1) SM is starting point, not automatically the end point; 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...”; PPG notes new homes needed may be higher than the SM indicates (Paragraph: 010, Reference ID: 2a-010-20201216); makes clear this will “...need to be assessed...” before identified need is translated into a housing requirement figure; Council continues to transpose the minimum SM figure into the FLP32; failed to assess whether SM figure should be adjusted upwards, despite clear requirement in PPG; starting point is also the end point: unsound. SM does not take into account economic growth strategies – the only adjustment to demographic trends is for affordability: takes into account <u>past</u> economic growth, but worsening affordability does not reflect economic growth which is planned to occur in the <u>future</u>. That is why the PPG singles out deliverable economic growth strategies as a specific reason to deviate from the SM.</p> <p>2) It is appropriate to plan for a higher housing need figure in Fylde. Paragraph 010 of the PPG: government committed to more homes built, supports authorities who plan for growth; states that circumstances where appropriate to consider whether actual housing need is higher; provides situations where housing need is likely to exceed SM; relevant in Fylde and justify an increase in housing need:</p> <p style="padding-left: 40px;"><i>(a) Economic growth strategies in the borough point to a higher housing need</i></p> <p>This proposition was set in the adopted FLP and its underlying evidence (i.e. SHMA) which the same examining Inspector found sound as recently as September 2018. SHMA had demographic starting point (274 dpa) that is essentially the same as the SM (272 dpa) but uplifted that figure to meet the Borough’s full housing needs over the plan period (c410-430 dpa) resulting in a housing requirement 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 FLP is effective at meeting the full needs of the Borough; uplift was justified due to necessary adjustments to OAN as a result of demographic need and market but also the Borough’s deliverable economic growth strategy; proposed modifications result in no adjustment to the SM; housing strategy and economic strategy mis-aligned: ineffective; by the Council’s own admission, the housing requirement figure of 275 dpa would: “<i>result in a misalignment between the economic development strategy for the plan and the housing requirement. Although in practice a higher level of housing delivery would be likely, <u>the housing requirement would not fully support the overall development strategy in the plan</u>” [our emphasis].</i></p> <p>NPPF sets out that sustainable development is comprised of social, economic and environmental objectives, and that these are interdependent; adoption of 272 as (part of) the housing requirement figure would create disconnect between the social and economic delivery objectives of the Plan, exacerbate unsustainable patterns of commuting 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>

(b) Strategic infrastructure improvements will drive an increase in housing

Significant recent and planned infrastructure improvements in Fylde; Preston Western Distributor is scheduled to open early in 2023; intended to promote development in the area; improve access from the EZ at Warton; and increase capacity on the existing local road network. A585 Windy Harbour to Skippool improvements will remove current bottleneck at Five Lane Ends, improve the A585 Mains Lane/A588 Shard Road junction; A585 DCO was granted consent by the Secretary of State on the 9th April 2020. One of the scheme's objectives is to deliver capacity enhancements to the strategic road network and support residential/employment growth in both Wyre and Fylde. The scale of infrastructure improvements will support an increase in housing.

(c) Previous and current levels of housing delivery

Recent completions data shows 463, 490 and 634 dwellings per year in 2017/18, 2018/19 and 2019/20 respectively. This provides a clear indication of local demand and additional housing in the borough.

(d) Previous assessment of need identifies a significantly higher level of housing need than the SM

SHMA identified a significantly higher OAN than the current SM; considered sound by the examining Inspector only two years ago.

3) Evidence of economic growth arising from the EZs. Recent evidence points to a need for an even higher housing target given the success of the Enterprise Zones; economic forecasting which underpinned the SHMA assumed no job creation at EZs through the plan period; considered sound by the examining Inspector; lack of "definitive evidence" at that time; concluded that a reasonable approach is to review this matter when more evidence becomes available. 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.

There is now definitive evidence that the number of jobs within the EZs is growing: progress report on the Blackpool Airport EZ to the Blackpool, Fylde and Wyre Economic Prosperity Board in September 2021 confirmed that to date: total of over 250 live enquiries currently logged for Blackpool EZ; 115 businesses have located to the EZ since April 2016; gross cumulative total of 1697 jobs have located to the EZ, this figure includes jobs new to the area, safeguarded jobs within Blackpool and construction full time equivalent jobs.

Further developments within the EZ's are emerging and will contribute further job growth: newly constructed 40,000sqft unit is estimated to bring 85 new jobs rising to 100 within five years, occupied in January 2022. EZ masterplan and delivery plans refreshed: revised masterplan includes highway improvements which will open up new land for commercial development: plots from 20,000 sqft up to 120,000 sqft, providing more investment and jobs locally; such significant economic growth would likely result in an increased level of housing need, justifying an increase in housing requirement, instead of the decrease proposed by the Partial Review.

4) The reality of the partial review. The Council should be ambitious; evidence confirms increasing delivery, buoyant market, positive market signals; perverse to be advocating a reduction; housing crisis; levelling up policy; and economy recovering. Only justification for the lower housing figure that the Council can provide is five year housing land supply; result would be a modified FLP which would only exacerbate affordability issues in Fylde; constrain housing supply; stymie economic growth and potentially achieve unsustainable development. This is not a basis for a sound plan.

9 HBF	<p>Amendment to remove the range of the housing requirement is appropriate and adds clarity to the policy. However, the HBF does not consider that the housing requirement is sound and considers that the housing requirement should be increased.</p> <p>Standard Method identifies minimum annual housing need figure, not a housing requirement figure; Government is committed to more homes built, 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. PPG (PPG ID: 2a-010-20190220) 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. Whilst the housing requirement has been increased to meet the unmet demand from Wyre it has not been increased any further to account for other elements of increased need and demand, identified by the high levels of delivery since 2016, the SHMA and the more recent household projections.</p>
10 Lichfields on behalf of Taylor Wimpey	<p>Taylor Wimpey objects to the above main modifications [includes MM6]. Partial Review and application of standard method must be considered in context of national ambition to boost supply of housing, help address housing crisis, advice in PPG on when a higher figure may be appropriate; do not therefore consider the minimum requirement of 305 dwellings post 2019, to be appropriate.</p> <p>PPG: circumstances when higher figure than standard method might be considered appropriate including growth strategies and meeting unmet need from neighbouring authorities; notes [quotes last paragraph of PPG para 010]. Framework: clear that to support the Government’s objective of significantly boosting the supply of market and affordable 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>Housing Delivery</p> <p>Previous levels of housing delivery should be taken into account as they justify a higher level of need than the standard method suggests. Housing Delivery Test [HDT]: performed very strongly over past 3 years, achieved 202% in the latest set of results. Over the three monitoring years 2017-2020, the Council delivered 512, 471 and 634 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 (415 dpa). Previous HDT results also show that delivery in the 2016-17 period (455 dwellings) was also in excess of the annual requirement.</p> <p>Following review by the Planning Inspectorate, the Council published an Annual Position Statement [APS] in October 2020 (EL1.002b): concluded that the Council has a 5.13-year supply at the base date of 1st April 2020. Over the next 5 years (2020-25), the APS anticipates delivery will be: 771, 541, 514, 510 and 367 respectively, total 2,703 units, annual average 541; in excess of the Council’s adopted housing requirement and annualised shortfall. Evidence demonstrates that Fylde has capacity to deliver its existing housing requirement; utilising the early review mechanism to suppress housing requirement is fundamentally at variance with Government ambitions to boost the supply of housing.</p> <p>Affordable Housing</p> <p>PPG requires calculation of the total annual need for affordable housing. The reference to uplifting the housing figures in the Practice Guidance to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement,</p>

	<p>rather than LHN itself. Key element of evidence is missing: no evidence which assesses impact of reduction in housing requirement on delivery of affordable housing but also on homes suitable for first time buyers, key workers and family homes; most recent evidence is within the Fylde Coast SHMA Addendum 1 (November 2014): concluded that the annual affordable housing requirement was 249 dwellings per annum: considerable; meeting this need will be adversely affected. Conversely, reducing the 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>Economic Growth</p> <p>Lack of alignment between requirement figure and economic growth aspirations in the adopted Local Plan, which the Council is not proposing to amend. Retaining the employment land requirement as adopted but reducing the housing requirement which was previously aligned could result in unsustainable commuting patterns; not sustainable development. Fylde Coast Strategic Housing Market Assessment [SHMA] Addendum 3 concluded that the OAN for housing was a range of between 410 and 430 dwellings per annum; adopted requirement is within this range; 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 adopted Local Plan aligned; no longer the case. Housing requirement of 305 dpa could result in unsustainable commuting patterns, would not promote sustainable development; Sustainability Appraisal notes levels of in commuting are already high, as Fylde is a net importer of employees.</p> <p>Conclusions</p> <p>Reducing the housing requirement will lead to a number of consequences in the Borough, for example:</p> <ol style="list-style-type: none"> 1 It will exacerbate the affordability issues in Fylde; 2 It will lead to unsustainable levels of commuting as the Council continue to pursue an aspirational employment land requirement; 3 It will exacerbate the already high affordable housing needs of the Borough; and, 4 It will depress economic growth and cut job creation through construction in the Borough. <p>Partial Review should be ambitious; Council has successfully delivered high numbers of homes; demonstrated that there is a market in Fylde to absorb this rate of delivery; currently delivering on requirement of 415 dpa and has an adequate supply of land, it seems perverse to be advocating a reduction when the Government wants to boost the supply and 'level up' the economy, driving growth in the north. Council would not be penalised for exceeding the minimum figure.</p>
11 Gladman	<p>Gladman reiterate the comments already made that the housing requirement should be increased.</p> <p>Gladman has concerns with the reference to 5 year housing land supply being calculated on the basis of the Liverpool method. As explained by Inspector Baird in the authority's now quashed 15th January 2020 Annual Position Statement Report: [quotes from paragraph 14 of Appendix 5 of EDPR05]. In accordance with the PPG1, Gladman believe that the authority should 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 plan period. No compelling reasons have been provided during the course of the current Examination for continuing to use the Liverpool method, which was primarily endorsed as part of the previous Local Plan Examination in order to allow the Council's strategic</p>

	<p>allocations to come forward. Sufficient time has now elapsed for these sites to progress, such as there is no requirement for the continued use of Liverpool, particularly in the context of a much reduced baseline housing target.</p>
<p>13 Emery Planning on behalf of Wainhomes</p>	<p>Having attended the Examination and considered EL3.004a, we maintain our objection 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 revised housing requirement conflicts with up-to-date evidence of housing need as set out in a recently adopted Local Plan; 3. The application of the revised requirement for 5 year supply. <p>National Planning Policy Framework (The Framework) and National Planning Practice Guidance (PPG)</p> <p>Government advice is that when there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies of a development plan that can be reviewed earlier than the statutory minimum of 5 years. Paragraph 33 of the Framework states that: <i>“Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly.”</i> Paragraph 61-062 of the PPG provides clarification on when local housing need will be considered to have changed significantly. It states: [quotes full section, emboldens:] <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 a quickly as reasonably possible.”</i>¹ (our emphasis)</p> <p>There is no justification in the Framework or the PPG for an early plan review based on the requirement generated by the standard method being lower than the adopted housing requirement. 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 and this fundamental point has not been addressed in EL3.004a. Therefore, on this reason alone the Partial Review is not entitled to review the requirement in Policy H1 and the Plan should not be proceeding to modifications stage.</p> <p>Even if there was that opportunity, paragraph: 039 Reference ID: 61-039-20190315 of the PPG sets out what the steps are for preparing evidence [quotes PPG]; 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 but no other meaningful evidence to maintain that there should be no uplift.</p> <p>Paragraph: 010 Reference ID: 2a-010-20190220 of the PPG states [quotes paragraph 010 of PPG in full]</p> <p>Using the standard method after applying the affordability ratio the housing figure increased from 253 to 275 dwellings, an increase of 22 dwellings. This is some 10% of the 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. This disparity is not addressed in EL3.004a, yet on this issue, the adopted Local Plan Inspectors Report states [quotes paragraphs 59-62 of EL3.002 in full]; 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</p>

significant uplift on historic rates of affordable homes which was necessary. By using the standard method, the Council and the Inspector is ignoring her conclusion on this issue and will have a significantly detrimental impact on the provision of affordable homes in Fylde.

Paragraph 6 of EL3.004a addresses economic uplifts, states [quotes paragraph 6 of EL3.004a in full]: this plainly ignores the comprehensive evidence base used for the adopted Local Plan. Whilst these assessments were produced prior to the Framework, a key part of the adopted Local Plan is the economy; paragraphs 54 to 58 of the Inspectors Report deal with; paragraph 58 states [full paragraph of EL3.002 repeated]: Local Plan proceeded and was found sound on the basis of job growth over the plan period; compelling reason for 415 requirement to be maintained; 2.2b.9 of the LPA statement to the Examination stated: *“The Partial Review housing requirement will fully support and underpin the delivery of the housing allocations and allowances made in the FLP32 and thereby continue to support the achievement of the Borough’s ambitions for economic growth.”* Whilst housing allocations and allowances are rightly retained, reduction to 275 dwellings is in direct conflict with adopted Local Plan ambitions for economic growth; standard method takes no account of economic and affordable issues on which the Plan was found sound. If a recently adopted Local Plan is not a document that falls within the remit of paragraph: 010 Reference ID: 2a-010-20190220 of the PPG, the Government’s ambitions of boosting supply and a plan led system are rendered meaningless.

Paragraph 15 of EL3.004a states: [quotes paragraph in full]; agree that there should be one requirement but on any reasonable reading of the Framework, the PPG and the basis for the figure of 415 in Policy H1 of the adopted Local Plan, the only figure that can be used is 415 dwellings in Policy H1. For DLF1 that would equate to 8,715 dwellings.

Wyre’s unmet needs

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: *“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.”* 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.

Wyre Local Plan Policy LP21 commits Wyre to a partial review with the objective of meeting the full OAN. [Quotes paragraphs 1.26 and 1.27 of SDPR01]. Therefore there is no need for Reason 2 of the plan review. On this point paragraph 9 of EL3.004a confirms this to be the case. However, paragraphs 10 to 13 state [quotes in full paragraphs 10-13 of EL3.004a]

Our overall point in our submissions to date is that we agree that these unmet needs should be met now so we support that position in EL3.004a but these 30 dwellings per annum should be in addition to the 415 requirement in Policy H1: would be a consistent approach based on the two housing requirements in two adopted Local Plans. A consequence of MM6 is that the unmet housing needs of Wyre will not be met in Fylde. We go back to paragraph 2.2b.9 of the LPA statement to the Examination which stated: *“The Partial Review housing requirement will fully support and underpin the delivery of the housing allocations and allowances made in the FLP32 and thereby continue to support the achievement of the Borough’s ambitions for economic growth.”* The retention to the housing allocations and allowances are to support the achievement of the Borough’s ambitions for economic growth. Those allocations were made to meet the 415 dwelling requirement. They cannot now also be used to help to address the unmet housing needs in Wyre, which is why the requirement in MM6 should be 445 dwellings and all the figures in MM1, MM2 and MM5 adjusted accordingly.

The application of the revised requirement for 5-year supply.

	<p>Only purpose of Partial Review is to artificially increase 5 year supply following 2 APS reports which found a very marginal supply; figure of 275 dwellings is suppression of actual housing need in the Borough; sites crucial to achievement of Borough’s ambitions, yet mechanism to help meet those needs if there are delays is paragraph 11(d) and paragraph 74 of the Framework. [quotes para 74 of NPPF21]; housing trajectory in the Plan is based on 415 dwellings per annum in the strategic policies; application of 305 for calculating 5-year supply would be a direct conflict with paragraph 74 as it is a requirement that is different to that in the trajectory. This is a key point not addressed by the LPA or EL3.004a.</p> <p>Application of a reduced housing requirement within 5 years of adoption through this Partial Review 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 paragraph 11(d) should be engaged.</p> <p>For these reasons, there is no support in the Framework or PPG for the Partial Review and it should be withdrawn.</p>
15 Story Homes	<p>Point c) of MM6 refers to the use of the ‘Liverpool’ method for calculating the Council’s five-year supply going forward. It is noted that the Inspector has not commented previously on the use of this approach to calculating five-year housing land supply.</p> <p>Fylde Council published its Annual Position Statement 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: [quotes in full paragraphs 12-14 of Appendix 5 of EDPR05]</p> <p>The original APS Inspector’s report applied the Sedgfield method. This report was subsequently quashed and reconsidered, but this was only 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 underdelivery. This was made clear by the Inspector in the replacement APS Report at paragraph 12. This partial review of the Local Plan now provides an opportunity to reconsider this matter.</p> <p>The use of the ‘Sedgfield’ approach would better respond to the NPPF objective to ‘significantly boosting the supply of homes’ in accordance with Paragraph 6. It is therefore considered that MM6 should include replace reference to the ‘Liverpool’ Method with the ‘Sedgfield’ method.</p>

Main Modification MM7: Paragraphs 9.22 and 9.24	
Representor	Summary of Representation
10 Lichfields on behalf of Taylor Wimpey	<p>Taylor Wimpey objects to the above main modifications [includes MM7] which relate to the proposed minimum requirement of 415 net homes per annum for the period 2011-2019 and a minimum housing requirement of 305 net homes per annum for the period 2019-2032 (7,275 net dwellings for the Plan period).</p> <p>[main comments shown under MM1 and MM6]</p>

Main Modification MM8: Paragraph 9.67	
Representor	Summary of Representation
10 Lichfields on behalf of Taylor Wimpey	Taylor Wimpey objects to the above main modifications [includes MM8] which relate to the proposed minimum requirement of 415 net homes per annum for the period 2011-2019 and a minimum housing requirement of 305 net homes per annum for the period 2019-2032 (7,275 net dwellings for the Plan period). [main comments shown under MM1 and MM6]

Main Modification MM9: Policy H6 Isolated New Homes in the Countryside	
Representor	Summary of Representation
No comments made	

Main Modification MM10: Appendix 1	
Representor	Summary of Representation
No comments made	

Main Modification MM11: Appendix 8 Performance Monitoring Framework Performance Monitoring Indicators 1 and 3	
Representor	Summary of Representation
No comments made	



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Review Date: N/A

Our Ref: PRFLP32/MM reps summary Authorised by: Julie Glaister, Planning Policy Manager