



Economic Development Background Paper

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Acronyms

AEM – Advanced Engineering & Manufacturing

DM – Decision Making

EZ – Enterprise Zone

LDO – Local Development Order

LPA – Local Planning Authority

NPPF – National Planning Policy Framework

NPS – National Policy Statement

OAN – Objectively Assessed Need

PPG – Planning Practice Guidance

Introduction

This document provides evidence in support of the Fylde Local Plan to 2042, in respect of the strategic matter of economic development.

The Fylde Local Plan to 2032 incorporating partial review was adopted on 6th December 2021. It is a complete Local Plan providing a comprehensive suite of policies including development strategy, land allocations and development management policies. The Fylde Local Plan to 2032 is the principal adopted Development Plan Document for the Borough.

It is a statutory requirement for all local plans to be reviewed at least every five years from the date of a plan's adoption. The National Planning Policy Framework (NPPF) says in this regard that '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'.

Town, District and Local Centres, (including main town centre uses)

The current Local Plan includes several designated centres in Fylde borough. There are three town centres in Fylde; St Annes, Lytham and Kirkham. Ansdell is the sole district centre in the borough and there are five local centres: Freckleton, Alexandria Drive St Annes, Headroomgate Road St Annes, St Davids Road North St Annes and St Albans Road St Annes. Each centre serves a function appropriate to the scale of the settlement.

Main town centre uses are defined in the National Planning Policy Framework (NPPF) (December 2024) and include the following uses:

“Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)”.

The vibrancy of centres is strongly linked to the range and quality of uses available, where the retail offer (both convenience and comparison goods) in particular is a strong indicator of the vitality and viability of a centre. Proposals for out of centre retail continue to be a threat to centres of all scales, with adverse impacts including increased private car reliance and increased vacancy rates in, and diverting trade from, the established centres. The protection of the established centres is important for both ensuring sustainable development and for supporting local communities.

Local Policy

Strategic Policy EC5: Vibrant Town, District and Local Centres

Existing Local Plan Policy EC5 establishes a retail hierarchy of centres across Fylde, including Town Centres, Ansdell District Centre and Local centres. It details appropriate uses within town centres and provides further detail on primary and secondary shopping frontages within the town centres, this being acceptable uses, operational hours and amenity considerations. It further details Ansdell as the sole district centre and outlines acceptable changes of use within this district centre and other local centres. The policy outlines proposals for new local centres at strategic locations (existing policies SL2: Fylde-Blackpool periphery at both Whitehills and Whyndyke and SL3: Warton) and sets the criteria that these new centres should adhere to. The policy recites that loss of community, health, leisure and cultural services within centres will be resisted unless they are no longer required or can be provided in an alternate, accessible location.

National Policy

NPPF 2024 Section 7: Ensuring the vitality of town centres

The 2024 NPPF requires development plans to define a network and hierarchy of town centres, the extent of town centre boundaries and primary shopping areas which allow for a mix of suitable uses that reflect their distinctive characters. Allocations should be made for main town centre uses and town centre boundaries should be kept under review. If such sites are unavailable then edge of centre sites should be allocated and failing this, alternate sites that are well connected to the town centre. The framework advocates a town centre first approach, where main town centre uses should be located within the town centre, then edge of centres if suitable sites are unavailable and then out of centre locations as the least preferable choice. The value of residential development towards town centre vitality and viability is acknowledged.

Applications for retail and leisure outside of town centres that exceed a locally set threshold should require an impact assessment to determine the impact on nearby centres. Sequential tests are to apply when proposals for main town centre uses are proposed outside of existing centres. Where suitable, available sites are found within centres an application would be failing the sequential test and planning permission should be refused.

Draft NPPF 2025

The December 2025 draft NPPF was published on 16th December 2025 and consultation ran until 10th March 2026. It includes updates to existing policies in the 2024 framework and introduces national Decision-Making (DM) policies. This new category of national policies is intended to standardise common policies across England, freeing up Local Plans to focus on local priorities.

Certain aspects of the current framework, which expect policies to be included in locally prepared plans, are not carried forward in the 2025 consultation draft. Where matters are addressed by the proposed national DM policies it negates the need for repetition in local development plans.

Draft NPPF 2025: Section 8: Ensuring the vitality of town centres

Within the NPPF consultation draft, Policy TC1: Planning for Town Centres introduces the requirement for development plans to be informed by a strategy for town centres in the area to ensure the full range of potential needs and opportunities for development are considered (TC1 1a). These strategies should investigate the scope to accommodate additional floorspace, to broaden the mix of uses (including residential) and to bring vacant premises and sites back into use. This is to ensure the full range of potential needs and opportunities for development are considered. Additionally, it now requires the hierarchy of centres in developments plans to set out areas that can accommodate intensification of uses, diversity of uses (TC1 1b (ii)

and identify areas where infrastructure and public realm improvements are proposed (TC1 1b (iii)).

The consultation draft encourages the use of design guides design codes and masterplans to support the development of town centres, encouraging local planning authorities to make use of article 4 directives to support the vitality and viability of centres and to maintain their character (TC1 2).

A key difference is that existing framework requires applicants and LPAs to exercise greater flexibility in the format and scale of development. The town centres first approach still applies whereby if no sites are available then edge of centre locations should be considered followed by out of centre locations. The new draft Decision Making (DM) policies however encourage applicants and LPAs to consider whether the type of development proposed could be accommodated across multiple sites within a centre before considering edge of centre locations if it cannot be firstly accommodated within the centre itself (policy TC3 3a). DM policy TC4 1(a) also requires a retail impact threshold to be set in the development plan, whereby if no threshold is in place a default of 2500m² gross floorspace should be required. The current threshold in the Local Plan is 750m².

Planning Practice Guidance: Town Centres and Retail

Planning Practice Guidance (PPG) provides further context to the National Planning Policy Framework (NPPF) and is a material consideration when taking decisions on planning applications. It is intended that PPG and the NPPF are read together and that development plans must have regard to both the framework and PPG.

PPG guidance references the NPPF definition of town centres and that they are defined by specific uses. It details complimentary town centre uses that can boost vitality and viability such as residential development and lists the benefits of the nighttime economy to increase economic activity and employment opportunities.

PPG details the tools and powers available to LPAs to shape and support town centres, including Local Development Orders (LDO's) and compulsory purchase powers. There is the expectation that planning policies should define the extent of primary shopping areas and furthermore primary and secondary retail frontages. It further provides guidance on the scope of a town centre strategy and what it ought to contain. This can include a vision for town centres, the role and functions of town centres over the Local Plan period, and complimentary strategies working to town centre vitality and viability.

PPG acknowledges that some future development needs cannot be accommodated in the town centre and discusses out of centre proposals and how they should be assessed, including the sequential test (considers location) and impact test (considers impact on local centres) for out of centre development. It details how both tests should be used and applied in decision making and plan making.

For plan making, the sequential approach requires a thorough assessment of the suitability, availability and achievability of locations for main town centre uses and sets a checklist on the matters to be considered. This includes whether the need for town centre uses has been assessed, whether such uses can be accommodated on town centre sites and if not, what are the next sequentially preferable sites?

Similarly, PPG states that for plan making the impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of particular centres. However, if plan policies are meeting the assessed need, then the issue of adverse impact should not arise.

Use Classes Order

On 1st September 2020 the 1987 Use Classes Order was significantly amended whereby use classes A, B1 and D1 applicable to retail, office and non-residential institutions and assembly and leisure uses are removed and new classes introduced in their place. Having retail, office and other services within the same use class allows a range of uses to locate in town centres without requiring planning permission, despite not being detailed as main town centre uses.

The new use class E encompasses commercial, business and service, whilst F1 and F2 apply to learning and non-residential institutions and local community uses respectively. Additionally, some uses which were previously given their own use class have now been included within sui generis.

The residential (C classes), general industrial (B2) and storage and distribution (B8) use classes remain unchanged, except for a new cross reference in the B2 class to the new Class E 'commercial' use class.

Evidence Base

Fylde Health Check and Centres Study (2022)

The study looks to establish the current position of Fylde's centres in respect of the need for additional retail and other main town centre uses in Fylde and to consider the vitality and viability of the key town centres at St Anne's, Lytham and Kirkham. The study further considers the performance of each centre regarding convenience goods and comparison goods expenditure.

The study reports that the three centres capture a strong market share of convenience shopping expenditure in their respective areas but are weak in attracting expenditure from other areas across Fylde. For convenience shopping the market share of each centre across the borough remains relatively unchanged between 2011 and 2022, however the study identifies a shortfall in convenience shopping provision across all three centres, being more pronounced in St Annes and Kirkham.

In St Anne's town centre, there is a £14.9m expenditure surplus which could support an additional moderately sized supermarket and a £9.3m expenditure surplus in Lytham that generates enough demand for an additional entrant to the local grocery market. The biggest capacity surplus identified however is in Kirkham totalling £18.7m, which equates to the need for a relatively substantial supermarket providing between 1,400 and 1,900m² of additional convenience goods floorspace. The study also identifies leakage of expenditure from Lytham town centre to new out of centre locations which is something that the new Local Plan may wish to address, however the town centre first policy is prescribed by national framework and would be determined by national DM policies going forward.

Regarding comparison goods, the study identifies a comparison goods deficit of -£0.3m in 2022, which increases to a surplus of £2.7m in 2032. "In practical terms, this means that there is very little change in the need for further comparison goods floorspace across the borough over the next decade" with "very limited identified quantitative capacity for additional comparison floorspace within either of the three Town Centres".

"Fylde's centres generally have moderate comparison goods retail role. This is reflective of their scale and primary function in meeting day to convenience goods and service needs". There is "the clear importance of the convenience goods sector to Fylde's town centres". At most there would be a need for a gain of 100-200sqm in St Anne's and Lytham in 2032 and an even more modest gain in Kirkham, requiring between 0-100sqm of comparison goods floorspace to 2032.

The study concludes by conducting health check assessments of the three town centres, finding that St Anne's, Lytham and Kirkham are all vital and viable centres.

In the Council's experience, a local centre in Warton needs defining as a matter of importance. Not having a defined boundary makes it difficult for planning officers to carry out the sequential test for retail as it is unclear where Warton's centre starts and ends, lacking a clear, identified catchment on which assessments can be made. The absence of a centre makes it unclear if there is a need to undertake a sequential test at all, as if there is no defined centre then all development could be regarded as out of centre. The impact is that it makes it more difficult to resist inappropriate development and the town centres first policy starts to fall away.

The current Local Plan does not detail the location of a future centre in the policy text, but the policies map shows an indicative location for a centre in Warton. The policy as it stands is aspirational and gives no guidance on where such a centre would be located, however in the Council's experience applicants are using the indicative location for Warton's centre as the confirmed location as there is no guidance on the matter. In conclusion the area in which Warton town centre covers needs defining as it is causing issues with the sequential test and thus allowing inappropriate development to come forward.

The current centres policy under EC5 is out of date as it refers to acceptable use classes within centres. It would be more appropriate to instead define acceptable uses as the main town centre uses as per the NPPF and remove any references to use classes. Detailing specific use classes not only duplicates the policy wording but given that uses would be permissible under the framework it would be difficult to resist them locally unless article 4 directives are put in place at a later stage. Finally, primary and secondary shopping frontages are now redundant and have been replaced with primary shopping areas. The policy going forward should therefore be updated in line with the framework to detail primary shopping areas with accompanying maps displaying their location.

Conclusions/New Issues

Publication of the 2024 NPPF shows no substantive change since the 2019 framework in which the Local Plan was prepared under. The text and requirements of the framework remain unchanged between 2019 and 2024, whereby local policy is compliant with the most up to date framework.

The 2025 draft NPPF introduces the new requirement that development plans should at the most appropriate level be informed by a strategy for town centres. To ensure that the full range of potential needs and opportunities are considered the policy seeks to broaden the mix of uses and bring vacant sites and premises back into use. In promoting a town centre first approach it puts greater emphasis on the planning tools available to local authorities, encouraging the use of masterplans, design guides, design codes and article 4 directives so long as they support town centre vitality and viability. Going forward, the new Local Plan should detail aspirations for the production of design guides and town centre strategies for centres for those centres that do not already have one in place.

The current floor space requirement for triggering a retail impact assessment in policy EC5 is 750m² and this should be upheld. This is in accordance with the draft NPPF 2025 that requires a local threshold to be set in the development plan in place of the default 2,500m². Changes going forward resulting from national DM policies encourage greater flexibility. Where there are no suitable sites within town centres consideration will be needed towards accommodating town centre uses across multiple sites prior to edge of centre and out of centre locations.

The Fylde health check and centres study identifies that St Annes and Kirkham have trading surpluses of £14.9m and £18.9m respectively with regards to convenience goods. In light of this trading surplus, the study notes this can sustain additional supermarkets in St Annes and Kirkham. The policy recommendation would be to make provisions for new supermarkets in St Annes and Kirkham town centres through a criteria-based policy. Having a new criteria-based policy would ensure suitable and appropriate development that meets the need of each settlement without designating a specific location. It may be appropriate however to include a requirement of a new supermarket being within the catchments of St Annes and Kirkham to

ensure the development is well related to the settlement being served. The study area in the document is grouped into zones based on postcodes, of which are considered geographic areas that may accommodate broadly similar patterns of shopping behaviour. Given that Kirkham and Warton are in the same zone it is appropriate to locate a future supermarket in Warton. This on the basis that Kirkham already has good convenience shopping provision and that Warton lacks such a facility, where new provision would support Warton as a strategic location. There is no need to provide further comparison goods floorspace across the three existing centres going forward.

Updates to Planning Practice Guidance need to be accounted for in the new Local Plan that relate to the amended use classes order. The text formerly referred to main town centre uses as predominantly being class A1 retail, however PPG now refers to main town centre uses as those within the commercial, business and service use classes. Broadening the use classes will allow development for non-town centre uses to occur in town centres without planning permission, so additional policy controls may be required. Any references to specific use classes should therefore be removed from the policy text. The Local Plan policy should define acceptable uses within centres as those main town centre uses in the NPPF and define the extent of primary shopping areas in place of primary and secondary shopping frontages.

PPG also specified that permitted development rights allowed a range of uses to convert to another use temporarily for a continuous period of up to three years to test business models. This had a cutoff point of 31st July 2021 in the 2019 PPG, however this restriction has been removed and the right is now in place indefinitely.

The current Local Plan identifies the need for new local centres at strategic locations SL2 Fylde-Blackpool Periphery (Whyndyke and Whitehills) and SL3 Warton. A local centre in Whitehills has been approved under planning application 24/0508 for a mixed-use development on Cropper Road, comprising 58 affordable dwellings and a neighbourhood centre.

The new Local Plan will need to define a local centre in Warton on the policies map and any references to a “proposed” centre will need to be removed. A scheme is being delivered at Warton Village Centre under application 26/0101 that proposes public realm enhancement works and the creation of a village square and event space at land to the south of the Scout and Guide headquarters in Warton. The new events square will form a focal point of village centre improvements and is designed to accommodate a range of activities including markets seasonal celebrations and public gatherings. The development does not serve any retail functions in of itself, being more aligned with public open space, but helps to consolidate the surrounding uses collectively in the local centre designation. As a minimum this scheme will require designation under the policy protecting existing open space (part of the green infrastructure network).

The new Local Plan to 2042 should allocate and detail in the policy text neighbourhood centres as a designation below local centres within the retail hierarchy. Policy recognises

neighbourhood centres as those small parades of shops outside of local centres that are of neighbourhood significance.

The following Neighbourhood Centres should be recognised in the new Local Plan to 2042:

- Heyhouses Lane
- Kilnhouse Lane
- Lytham Road, Freckleton
- Moorland Road
- Naze Lane, Freckleton
- Saltcoates, Lytham
- Singleton Avenue
- Whalley Place
- Wrea Green

It is important to designate these areas as they serve an important neighbourhood function by providing accessible services and contribute towards sustainable development by being within walking distance of residential catchments. They are not currently allocated in the Local Plan and so identifying and allocating them is justified on the grounds of their protection.

Strategic Employment Sites

Strategic employment sites are those within Fylde that serve a key economic function. The three main strategic employment sites in the Borough are BAE Warton Enterprise Zone, Blackpool Airport Enterprise Zone (EZ) and the Westinghouse Springfields nuclear facility in Salwick. Manufacturing represents 30% of employment in Fylde, with advanced manufacturing in aerospace and nuclear fuels processing being key strengths.

The strategic employment sites are occupied by large, high-value employers in the borough that also support further jobs indirectly through the networks, suppliers and supporting services ancillary to the main use. They have the potential to attract high profile businesses and investment which will also help deliver a high-quality environment with obvious trickle-down effects across Fylde and wider the Lancashire region. This can include new retail opportunities and upgraded transport infrastructure to improve accessibility and the attractiveness of the sites, encouraging further investment.

The EZ designations at Warton Aerodrome and Blackpool Airport further increase the attractiveness of the strategic sites by providing benefits such as business rate relief. BAE Systems Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing EZ also benefits from a Local Development Order (LDO) that permits particular types of development so that planning permission is not required, giving certainty to development and reducing time constraints associated with the planning system.

Westinghouse Springfields

The Westinghouse Springfields facility in Salwick is a nationally important licensed nuclear facility identified under existing Local Plan policy EC1: existing employment sites in the Local Plan to 2032. The site is situated within the Westinghouse complex and is used for the disposal of low-level radioactive waste produced at the processing plant.

Existing Local Plan Policy GD5 identifies Westinghouse Springfields as one of the Large Developed Sites in the Countryside and Green Belt and lists the conditions in which development is permitted. GD5 applies to a large sites in the countryside and green belt covering a range of uses, however there is no site-specific policy relating to Westinghouse Springfields.

At the county level, the Joint Minerals and Waste Local Plan allocates the Westinghouse Springfields site itself and the Salwick railway sidings. The railway sidings were adjacent to the Westinghouse facility and safeguarded against development, however these have since been removed following the electrification of the railway line.

Looking at a broader scale, the National Policy Statement (NPS) sets out the Government's policy for the delivery of major energy infrastructure. NPS EN-1 is the Overarching National

Policy Statement for energy (EN-1) and NPS EN-7 for Nuclear Energy Generation is specific to development for nuclear energy generation. Both are relevant to the Westinghouse Springfields site.

Evidence Base

The growth opportunities available at the Westinghouse Springfields site are well-documented, including potential for new investment in uranium enrichment capacity for nuclear fuel for future reactors. The site's rich history in manufacturing nuclear fuels and its significance in being the UK's only commercial fuel fabrication facility are advantageous in this respect. This is recognised in the Lancashire Growth Plan (2025-2035), stating "The Westinghouse facility at Springfields offers an opportunity to recommission this enrichment capability in the UK".

There are currently two land occupiers carrying out different activities at Westinghouse Springfields but they are part of the same wider site. The government owns the land and the use is unlikely to change significantly due to matters around energy security. To date, development on the site has been piecemeal, lacking a coordinated approach or long-term strategy. No planning applications have been received by the Council for the Westinghouse Springfields facility in recent history, where there has been a continuation of the existing employment uses on the site. Due to the nature of the site and the nuclear license and the stringent regulation involved, future development will be predictable and will only ever be related to nuclear jobs and activities.

It would be advantageous to establish a long-term strategy for Westinghouse Springfields to determine the requirements for enabling uses on the site. The Local Plan to 2032 details that the occupier intends to retain the Westinghouse Springfields site in the long term, whereby the new Local Plan to 2042 should introduce a policy specific to the Westinghouse Springfields site and its operations. This should support the continued use of the site for nuclear and chemical processing, for national energy security and for the site's contribution to local jobs. Related and ancillary uses should also be supported on site so as not to restrict the site's expansion or future growth opportunities. Any development that compromises the growth and expansion of operations on site should not be supported.

BAE Systems Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing Enterprise Zone

Existing Local Plan policy EC3 outlines the Council's support for the BAE Systems Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing Enterprise Zone (EZ), distinguishing between the BAE Systems core area and the EZ on the Local Plan policies map. The policy highlights the importance of the BAE Systems Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing EZ for stimulating growth, attracting inward investment and having trickle down effects to the local economy.

Policy EC3 details the significance of the masterplan for guiding development and details the Lancashire Advanced Engineering and Manufacturing Enterprise Zone (Warton) Local Development Order No.1 (2025) (the LDO) that provides permitted development rights on the site. This gives certainty for acceptable uses related to manufacturing and advanced engineering, plus any ancillary uses, reducing the timescales associated with applying for planning permission for development falling within defined uses. The LDO specifically authorises development related to advanced engineering and manufacturing in the area identified as phase one at the Lancashire EZ (Warton). The Lancashire Advanced Engineering and Manufacturing EZ, Phase 1 Masterplan 2025 Rev D (February 2025, (The Masterplan) serves as the design framework, with the LDO being the tool to accelerate the delivery of appropriate development.

The masterplan sets the framework for the delivery of long-term strategic objectives whilst the LDO acts as a tool to both facilitate delivery and guide implementation (Warton Phase One). This updated masterplan aligns with current circumstances including changes at the site, the surrounding area and changes to planning policy and legislation. It includes updates to the buildings being retained and demolished, new fencing and the new gatehouse to separate the EZ from the operational aerodrome. The construction of Typhoon Way as the principle access onto the site is also detailed.

Opening up the site access via Typhoon Way and relocating security on Mill Lane separates the EZ from the operational aerodrome, with the developments being secured under approved application 24/0304. This partially reconfigures the existing internal access to form a new entrance inside of the site, to facilitate operation of the site as an EZ, including provision of a gate house, security barriers and a roundabout at the south east corner of the retained aerodrome site (South West corner of the Phase One EZ).

Evidence Base

The Lancashire Growth Plan 2025-2035 highlights the BAE Warton EZ as being well positioned to capture the growth opportunities available in future aviation and space technology markets, including Unmanned Aerial Systems (UAS). The activities at Warton EZ leverage expertise in aerospace, space engineering and cyber application sectors, where existing test and innovation centres at Warton can unlock significant regional benefits, including revenue and investment.

It details the Altitude facility on site that features test facilities for uncrewed aerial systems, research laboratories, classrooms, a business incubation hub and a multi-use events space. The Lancashire growth plan makes the BAE Systems Warton Aerodrome a major project for fostering growth, partnerships and boosting the skilled workforce.

Both the BAE Systems Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing EZ and Blackpool Airport EZ are detailed in the Economic Needs Update and

Employment Land review (August 2024) that outlines the growth opportunities in Fylde that can be achieved through the planning system.

The review expects that most new employment development to 2042 will be for industrial and warehousing uses. However, it raises that there are opportunities for new office development, where there is currently a lack of modern office stock required by businesses which is suppressing growth across the Fylde Coast.

Opportunities for employment land provision at the BAE Systems Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing EZ are limited given that BAE Warton is a secure site where most development will be for the exclusive use of BAE and related businesses in the supply chain, insofar that it has not been included in the baseline employment land supply.

It is recommended that for the Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing EZ, Fylde Council engage with the master planning process to clarify the scale and nature of the employment land supply and to seek what land is available for BAE, its suppliers and what land could be made available for a broader range of relevant businesses.

Generally, the LDO has not created any conflicts in decision making as it based on the need for businesses to co-locate with BAE Systems. The core activity of the site remains the same and it has been business as usual, with the LDO itself being under-utilised. The site warrants its own enabling policy that recognises its strategic importance for national security. The new policy should both reflect the updated masterplan and support both the existing activities in advanced engineering and manufacturing and the emerging growth opportunities available on site. Any new development however should not compromise or negatively impact the core aviation or defence activities. A new policy should give acknowledgement of the SSSI and other ecological constraints in proximity of the site in the Ribble estuary and subject applications to the appropriate assessments.

Blackpool Airport Enterprise Zone

Strategic Policy EC4: Blackpool Airport Enterprise Zone (EZ) in the current Local Plan establishes the Blackpool Airport EZ site boundary as per the policies map and highlights the local economic benefits of the designation. It sets aspirations for growth through the energy, advanced manufacturing, engineering and digital and creative sectors and scope to expand commercial aeronautical activity. The policy lays the conditions for development within the green belt and that very special circumstances must justify any development here.

Detail is given on alternative land uses and that these must be appropriate, enabling development that will help deliver aviation uses on the site. EC4 is stringent that alternative uses will be limited to development that is only absolutely necessary for funding essential infrastructure and will not compromise the site's primary aviation function. Alternative uses will be permitted where no sequentially preferable locations are available within or around

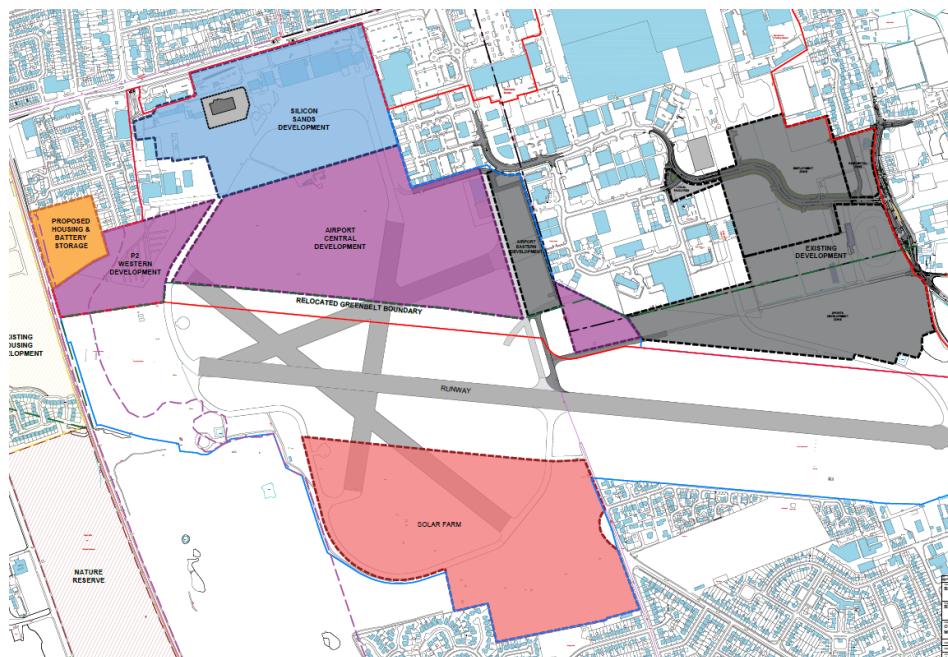
designated centres and that main town centre uses must satisfy sequential and impact tests as per the framework.

The policy outlines scope for an LDO to aid delivery of the BA EZ and that key stakeholders are preparing a masterplan. This will establish the development and design framework, determining the mix, location and amount of development on site with an agreed implementation programme.

A new masterplan for Blackpool Airport EZ was received by Fylde Council in the Regulation 18 consultation of the Fylde Local Plan to 2042. This indicative layout includes the following elements:

- Silicon Sands development,
- Airport central development,
- Proposed housing and battery storage at the west of the EZ
- Solar farm at the south of the site.

The masterplan proposes the Silicon Sands knowledge quarter on the airport apron and relocates the Airport central development further south and into the green belt. This would require green belt release as part of a proposed relocated green belt boundary. There are proposals for the inclusion of a solar farm in the green belt.



Evidence Base

The airport site presents significant growth opportunities, with proposals for a digital-led campus at Blackpool Airport EZ to be anchored around a series of green data centres

(Welcome to Silicon Sands brochure, 2024). Planning applications have been received for infrastructure including an electrical substation (application: 25/0450 Primary Substation approved April 2026), a 20MVA on site solar farm and the potential to connect to a 3.5GW offshore windfarm in the Irish Sea. A 15,000 sq ft. data centre is expected to be built from 2025 on available land at the current entrance to Silicon Sands.

The Fylde Coast Economic Needs Update and Employment Land Review (August 2024) (ELR) highlights Blackpool Airport EZ as one of the most notable locations for office space growth. Squires Gate and Whitehills together hold 84.7% (47.97 ha) of Fylde's realistic employment land supply, of which 14.50 ha is at Blackpool Airport EZ. Knowledge Quarter masterplan proposals include 15 no. 2-3 storey office blocks and a data centre, although the review acknowledges a range of factors that could impact delivery, including demand and the successful relocation of the airport uses further south. The ELR acknowledges that the public sector led Knowledge Quarter proposal (Silicon Sands) is the strongest option for office development.

The ELR acknowledges the uncertainties around the delivery of employment land at the Blackpool Airport EZ. It is recommended that Blackpool and Fylde Councils, the Airport and other partners produce a delivery strategy to understand whom is delivering what infrastructure and when. A financial appraisal should be undertaken to understand viability and clarification is required on what green belt land needs releasing to secure the full development. The study recommends the Blackpool Airport EZ should continue to be protected for future class E(g) and B2 uses in the next Local Plan, where it should be reflected in policy going forward that existing uses will be protected.

The ELR states that should the Knowledge Quarter (Silicon Sands) be developed to its full extent it could provide 70,355m² of gross office and data centre floorspace. This is advantageous as it meets the objectively assessed needs of Fylde (38,360m²) and that of Blackpool (11,840m²) should Blackpool's need be accommodated by Fylde.

Given the context of Blackpool's 3.11ha shortfall in employment land, of which a component of this is office floorspace, the study recommends engagement between Fylde and Blackpool authorities to explore the opportunity to accommodate the sub-regional office needs of both authorities. The review acknowledges that office development at Blackpool Airport EZ could meet business needs in both Fylde and Blackpool and would be the best option in terms of viability. It would not be possible to bring forward private sector office development without public sector financial support. "None of the current regeneration programmes are likely to deliver office uses in the main town centres of Fylde Borough and given viability constraints, new build private sector office development appears unlikely".

The Lancashire Growth Plan 2025-2035 highlights Silicon Sands as an opportunity that can help realise the growth of Lancashire within the emerging green and digital economies, noting

aspirations for a low carbon data centre and a strategic AI and sustainable infrastructure hub for Lancashire.

The Lancashire Growth Plan details merits of the site, including its positioning with the North Atlantic Loop for fibre internet, direct connections with the UK's main internet exchanges and 25 acres of available land. Blackpool Airport EZ presents an opportunity for Lancashire to emerge as a major AI growth zone and is well positioned to drive economic growth, attract global investment and create high value tech jobs.

Planning History: Blackpool Airport EZ

- 26/0015 Approved - extension to side of hangar to allow enlargement of existing visitor centre including ancillary cafe, workshop and staff facilities (use class f1)
- 25/0646 Approved - outline application for construction of a mixed use technology exemplar building with a gross internal floor space of up to 3164 square metres incorporating a data centre (use class b8), research and development (use class e(g)(ii) and office (use class e(g)(i)) uses including new access points, plant equipment, car parking and other associated infrastructure (access applied for with all other matters reserved). This is to comprise a data centre and complementary research and development facilities.
- 25/0450 Approved - Erection of a substation including switch house, transformer bays, installation of transformers, security fencing and access road. The Design & Access statement mentions this is in the region of 30MW, which is consistent with the *Welcome to Silicon Sands* brochure referenced above that mentions a 32MW primary substation.
- 25/0303 approved (see also 24/0435) - Demolition of existing vehicle search point (vsp) and administrative office buildings and erection of replacement single storey vsp and administrative facilities building with associated infrastructure including car park and new secure fencing and access gates (part retrospective application). This application completed in the 2025/26 monitoring year.
- 23/0589 approved - Hybrid planning application relating to EZ development consisting of full application for the construction of new access roads, existing highways improvement works and drainage works; and outline planning application for the construction of 4 no. hangars, a commercial unit (class B2 / E(g)) and car parking, alongside associated infrastructure works with access applied for and all other matters reserved.

Releasing green belt land at Blackpool Airport EZ can encourage non-aviation uses outside of the airport's primary function. Green belt release would result in an increase the amount of

applications received that are not related to the airport. The higher land values resulting from green belt release would lead to greater number of inappropriate proposals that would undermine the primary aviation use of the airport. Only very special circumstances justify release of land from the green belt and the way the way that the policy currently stands works well in accommodating other uses. Details on the solar farm allocation at Blackpool Airport EZ are sparse, where it is recommended that going forward discussions on the solar farm are picked up and reflected in any masterplans for how the site is to be developed. In the Council's experience with BAE Systems Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing EZ there is little value in designating an LDO at Blackpool Airport EZ as it would not generate any significant development.

A separate policy for Blackpool Airport EZ is warranted given the future potential growth opportunities in ai and digital economies as part of the upcoming Silicon Sands development (Knowledge Quarter). The policy should also make provisions for relocating the existing airport infrastructure to accommodate the Knowledge Quarter development, however the existing uses and core aviation function should be protected.

Conclusions/New Issues

The new Local Plan to 2042 should include a specific policy relating to the Westinghouse Springfields site (Salwick) currently identified under existing Local Plan policies EC1 and GD5. This is to distinguish Westinghouse Springfields as a strategic employment site with tailored requirements and to reflect its strategic importance for national energy security. Any references to Westinghouse Springfields should be removed from policy GD5 to avoid doubling up of any policy text.

More generally, policy GD5 would benefit from a review as there are sites mentioned with also feature in other policies including EC1. To avoid policy text duplication these large developed sites in the countryside, including Westinghouse Springfields, should be removed from GD5 and any applications be determined through either the employment land policy or through standalone, site specific policies. It is helpful that policy GD5 identifies large Developed Sites in the Countryside however it is recommended that no additional sites need to be listed in the policy.

The policy text in GD5 is currently unclear about what redevelopment means for these large developed sites in the countryside, whether it concerns ancillary uses or expansion of the current use, with a doubling up of policy text. This is seen where Kirkham Prison is listed in policy GD5 but requires that any development of this site should be in accordance with the provisions of policy GD2 and the framework.

Additionally, it is recommended that Mill Farm is removed from policy GD5 if it is being allocated as an employment site and to also remove Naze Lane industrial estate (allocation ES8) from policy GD5 as per the recommendations of the Economic Needs Update and Employment Land Review, that details that Naze Lane is of poor quality. It is helpful to identify

these large sites and the existing use would be supported, however the site constraints should be provided in a future policy if alternative uses are to be proposed. Policy GD5 should also be updated with respect to the new use classes if it is carried forward.

The new policy should continue to support the current use of the Westinghouse Springfields site whilst also providing the flexibility for supporting and ancillary development to expand and achieve the long-term aspirations. The policy text must require that any proposals put forward are should not compromise the current use on site and comply with the Nuclear Safeguards (EU Exit) Regulations 2019 (NSR19).

Having a specific policy for BAE Systems Warton Aerodrome and Lancashire Advanced Engineering and Manufacturing EZ would be advantageous for supporting the current use of the site for advanced engineering and manufacturing. This is required to ensure the site can continue to operate and is a matter of national security and resilience. The policy should enable the growth potential of the EZ in the without compromising its current use. The policy should require development to follow an adopted masterplan and give consideration to ecological designations in proximity of the site. Policy should also consider the expansion of the site with scope for green belt release.

The ELR recognises that Blackpool Airport EZ is one of the prime locations for meeting future office requirements and accommodating office space growth. Additionally, the ELR recognises the opportunity for the growth of Silicon Sands (Knowledge Quarter) to unlock the local and regional benefits of the green and knowledge industries. It will be for the Local Plan to provide the very special circumstances that justify the release of green belt land for economic growth and the delivery of the knowledge quarter (Silicon Sands). The recommendation is a bespoke policy in the Local Plan to 2042 Local Plan land to protect the primary aviation function of the site and encourage growth in the digital and knowledge economies.

In conclusion, each of the three strategic employment sites require their own policy in the Local Plan to 2042 to reflect their importance both for security matters, local employment and for attracting inward investment to Fylde borough.

Employment Land Provision

In achieving sustainable development the planning system has an economic objective to help build a strong, responsible and competitive economy. There should be sufficient land of the right available in the right place at the right time to support growth, innovation and improved productivity. The framework requires that strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for employment land.

The Local Plan identifies employment land under existing policy EC1 that includes both current allocations and retained employment land within the existing employment sites. Windfall sites outside of any employment designation are covered in existing policy EC2

Large, developed sites in the countryside and green belt are currently identified as part of a criteria-based policy that lists the conditions in which development is permitted.

Local Policy

Strategic Policy EC1: Overall Provision of Employment Land and Existing Employment Sites

Existing Local Plan Policy EC1 outlines provision of employment land in Fylde borough and the appropriate uses on each employment allocation. This includes both employment sites and mixed-use sites that feature an element of employment land. Alternative uses on these sites are resisted unless there is no reasonable prospect of the sites coming forward for these purposes and that the tests of policies GD7, GD8 and other existing Local Plan policies are satisfied. The policy further outlines the borough's existing employment sites and appropriate uses, applying the same principles to existing sites with regards to appropriate uses of the land.

Strategic Policy EC2: Employment Opportunities

Existing Local Plan policy EC2 deals with employment uses on windfall sites and acknowledges the limited employment land available in Fylde borough. It seeks to retain all employment uses on existing employment sites, including agricultural uses and all class B employment uses (also now incorporating Class E uses). The policy acknowledges that once employment land is lost to other uses it is unlikely to return and therefore land will be retained for employment uses unless there is no reasonable prospect of it being used as employment land. EC2 permits alternative uses subject to satisfying the requirements of policies GD7 and GD8 but encourages flexibility to meet future employment needs and local requirements. Policy EC2 outlines that employment opportunities will be supported when in accordance with other plan policies.

Non-Strategic Policy GD5: Large Developed Sites in the Countryside and Green Belt

Policy GD5 in the current Local Plan identifies large developed sites in the countryside that cover a range of uses, including Westinghouse Springfields, Weeton Barracks and Mill Farm Sports Village and details the criteria in which complete or partial redevelopment is permitted.

Proposals should not harm the character, ecology or heritage of the area regarding building height, footprint and massing and should be accessed by existing roads or access arrangements. Partial redevelopment proposals should not require additional public funding and development proposals should form part of a comprehensive long-term plan for the site as a whole.

Opportunities to improve public transport access, pedestrian links and cycle links are encouraged and the policy details that mixed use development is promoted on all the sites listed. HMP Kirkham is also identified as a large developed site in the countryside however any development is subject to the provisions of policy GD2 in the current Local Plan.

National Policy

NPPF 2024 section 3: Plan Making,

NPPF section 3: Plan Making, requires under paragraph 20 for development plans to include strategic policies to address the Local Planning Authority's priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes (including affordable housing), employment, retail, leisure and other commercial development. Under paragraph 23 broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map. The framework further states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic policies of the area.

NPPF section 6: Building a strong, competitive economy, advocates that local policies should provide an enabling position and help create the conditions in which businesses can invest, expand and adapt, recognising local needs within the context of wider opportunities for growth.

Local Plans should set a clear economic vision and strategy that has regard to local and national strategies. Policies should identify specific sites to meet anticipated need over the plan period, including facilitating development and addressing potential barriers to development. Flexibility is encouraged to accommodate needs not anticipated in the plan, allowing for a rapid response to changing economic circumstances. The framework further recognises that different sectors will have specific locational needs and requires policies to recognise and accommodate these. This includes making provision for clusters and/or

networks in the knowledge sector, storage and distribution operations at a variety of scales and the expansion or modernisation of other industries of local, regional and national importance with any supporting infrastructure required.

The framework further details the requirements of policies for supporting a prosperous rural economy. Planning policies and decisions should enable the sustainable growth and expansion of businesses in rural areas and allow for the development and diversification of agricultural and other land based rural businesses. It encourages sustainable rural tourism but acknowledges that there will be circumstances where appropriate sites for businesses may have to be found adjacent to or beyond existing settlements. This enabling policy encourages sustainable growth that is sensitive to local character.

The Local Plan to 2032 was prepared under the 2019 NPPF, whereby the new plan going forward requires updates to remain compliant with the latest December 2024 framework.

To account for this new text the new Local Plan to 2042 will need to consider facilitating any supporting development required from a modern economy. This is additional to the existing text under paragraph 87(a) that requires policies to consider specific locational requirements of different sectors, including knowledge, data driven, creative or high technology industries.

Additional new text added under paragraphs 87b) and 87 c) will need to be considered in the new Local Plan includes the following:

b) storage and distribution operations at a variety of scales and in suitably accessible locations *“that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain , transport innovation and decarbonisation and;”*

c) *“the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience”*

These require consideration of the locational requirements for storage and distribution operations and the locational needs for expansion or modernisation of other important industries.

Draft NPPF 2025 Section 7: Building a strong effective economy

Section 7: Building a strong effective economy of the 2025 NPPF consultation draft builds on the existing framework by adding additional text on setting a clear economic vision and strategy. Development plans should take into account both local business needs and wider opportunities for growth, making specific reference to the Invest 2035: modern industrial strategy and locating industrial strategy zones and Ai growth zones. Local policy going forward will need to account for these key sectors to remain compliant with the framework (E1 1a). To further encourage flexibility and given changing commercial property requirements, development plans are not to be overly prescriptive on specific uses at certain sites unless there is a clear and justified rationale for doing so (policy E1 2).

Giga factories, data centres and digital infrastructure are all emerging economies that have seen significant growth since the adoption of the Local Plan to 2032 (inc. partial review) which are not currently accounted for. The framework makes provisions for growth in the knowledge sector and modern economy more generally which will need to be included in the new Local Plan to 2042 going forward to ensure compliance with the framework.

National decision making policies have introduced guidance on freight and logistics and that substantial weight should be given to developments for farm and agricultural modernisation. This is to maintain and enhance farm viability and sustainability and support domestic food production and is a recognition of their importance in supporting growth and economic benefits. As this is detailed in national DM policy however it will not be covered in the Local Plan to 2042.

National DM policies further state that for those developments needing to demonstrate an unmet need, additional consideration should now be given to market signalling of an undersupply of specific land/premises. There should be consideration as to whether locational needs can be met by existing allocations in the plan (E2 2a, 2b).

To support rural businesses, national DM policies provide support for development to maintain and enhance farm viability and sustainability. This includes infrastructure but also mentions farm shops, where diversification and expanding uses can improve farm viability (E4 1d). National DM policies are additional to and do not supersede any current policy guidance in the Local Plan to 2032 (inc. partial review).

Decision making policy E4: Rural business development, supports the sustainable growth of rural business development in line with wider business support under policy E2. It encourages sustainable growth of rural businesses by rural diversification and specifically supports development proposing facilities for rural leisure and tourism (E4 1c). Paragraphs E4 2a and 2b replace paragraph 88c in the 2024 framework but remain consistent in encouraging the reuse of existing buildings and land and that development should respect the character of its surroundings.

Decision making policy S5: Principle of development outside settlements is closely related to the local policy GD4 regarding development permitted in the countryside.

Evidence Base

Fylde Coast Economic Needs Update and Employment Land Review (August 2024)

The Fylde Coast Economic Needs Update and Employment Land Review (August 2024) provides an economic needs update and employment land study for the boroughs of Blackpool, Fylde and Wyre, which are collectively known as the Fylde Coast sub-region. The study reviews 39 employment areas in Fylde and provides a baseline supply of 56.61ha across ten sites, focused around Whitehills and nearby Squires Gate.

The study makes key recommendations to encourage and delivery growth through the planning system. Finally Monitoring arrangements should monitor gains and losses occurring in the class E(g), B2 and B8 stock, the Fylde coast authorities should cooperate on issues with overlapping interest and a follow up study should be conducted in 5 years time (2029).

The review details Objectively Assessed Need for employment land, whereby the Objectively Assessed Need (OAN) for offices is 9.59 ha and the industrial and warehouse OAN is 19.09 ha. This gives a total OAN of 28.68 ha, but with an existing supply of 56.61ha the resulting surplus in Fylde is 27.93ha. The review concludes that “Fylde borough has sufficient land to meet its needs, 56.61 ha” and recommends no further employment allocations in the borough. Policy should encourage and focus office developments in the borough’s town centres and finally continue to protect the existing 56.61ha employment land supply.

The report investigates further growth opportunities across the three districts that could provide a potential future employment land supply. It lists 3 sites in Fylde that could provide an additional 43.09ha of employment land including Blackpool Airport EZ, however raises site constraint including that much of the land is green belt and will require an adjustment to the green belt boundary to accommodate proposals. The knowledge quarter also represents the most significant investment on office space across the Fylde Coast, however it is unclear whether proposals will generate additional land within Fylde Borough as it aviation quarter will partially accommodate uses from the existing airport complex.

The report also suggests that Fylde could play a role in meeting Blackpool’s needs for employment land to 2042. Under the arrangements in the current Local Plan Fylde has gifted Blackpool 14ha of employment land to help address identified shortfalls. Looking to 2042 the report finds that Blackpool has an objectively assessed need of 16.07ha to 2042, however as only 12.96ha is available it results in a shortfall of 3.11ha. Fylde has a surplus of 27.93ha and the study recommends discussion between Blackpool and Fylde Councils to explore the opportunity for Blackpool Airport EZ in Fylde borough to collectively accommodate the sub-regional office requirement of the two local authorities.

Demand is greatest for high quality serviced office space below 200m² with good public transport links and located on main road corridors. However, supply is not currently meeting the demand sought, where local businesses in Lytham, and St Annes have a critical mass of existing office firms which want to remain local but lack options for modern, higher grade serviced options that give the flexibility that they need. “A lack of modern office stock, of types required by businesses, is suppressing growth in the Fylde coast, but local rents are well below the level at which new build office development would be viable, without public sector support”. “In Blackpool borough, viability constraints mean that private sector office development is unlikely, without public sector financial support”.

The Employment Land review also assesses the property market for employment premises (industrial and office property markets). The findings show strong, continuing demand for

small industrial units <500m² with a shortfall in supply against demand. This also applies to the larger end of the market for industrial units 1500 – 4000m² that is constraining growth of larger businesses. “While the industrial and warehouse market is active across the Fylde Coast, demand is focused on locations which link to the M55 corridor” and that “in terms of the industrial market the vast majority of market activity is for sub 500 sqm units”.

This high demand is reflected in the occupancy rates, whereby Fylde showcases a 97.9% occupancy rate for industrial units and 96.7% occupancy rate for office units, suggesting shortages of industrial and office stock “which may mean that businesses will have difficulty finding adequate space to meet their needs”.

“Occupancy rates of 90-95 percent can be considered a reasonable balance between a vibrant, active market, providing good returns to landlords and providing capacity for churn and growth in the market. A higher occupancy rate is an indicator of a full market with businesses having difficulties in finding adequate premises”. The policy recommendation is therefore to continue to protect the existing employment land supply in the Local Plan to 2042 given the strong demand and finite supply. “It is recommended that the next Fylde Local Plan, continue to protect the full existing employment land supply of 56.61ha, for E(g), B2 and B8 uses”.

As detailed in the 2025/26 Business and Industrial land Schedule there are currently 11 available employment allocations in Fylde that collectively provide 53.755ha of available employment land as at 31st March 2026. The Economic Needs Update and Employment Land Review makes the recommendation that allocation ES8 Naze Lane Industrial estate in Freckleton is not taken forward and discounted from the available land supply in the new Local Plan. This is down to the site’s poor quality and lack of demand:

“The deducted site is FY8 Naze lane, Freckleton (2.40 ha), a very isolated backland, rural site which again has been undeveloped for some time. If not required by it’s owner, an adjacent business, it is unlikely to be of interest to other firms”.

Exclusion of the Naze Lane site in the Local Plan reduces the available land supply by 2.4ha, resulting in 51.355ha being available across 9 sites, with mixed use allocation MUS3 Mill Farm also being fully built out as of 31st March 2026.

Furthermore, the study appraises 39 sites that make up Fylde’s existing employment supply and grades them based on their quality, factoring in scale, location and setting. The recommends that for low quality employment land falling within Grade E that these sites are not protected in the Local Plan going forward and that alternative uses should be promoted if possible. In Fylde this includes Freckleton Boatyard and Carr Farm, Lodge Lane, Warton, “accommodating only a couple of micro-businesses, largely very low grade stock. They do not merit ongoing protection for E(g)/B-Class uses in the Local Plan”. Insert – in the case of Freckleton boatyard the specific nature of businesses with particular locational requirements warrants retention of the site.

Going forward, the Local Plan may wish to allocate additional land at Bradkirk Hall Business park north of Wesham. The site comprises nine business units from former agricultural buildings suitable for a range of trade, warehousing and workshop uses. The site is in a sustainable location and benefits from close access to junction 3 of the M55 motorway. There is also a shortage of employment sites in the Wesham area, whereby the nearby Mill Farm mixed used site that is a current employment allocation has been fully built out.

Fylde Council Business & Industrial Land Schedule (2025)

The Business & Industrial Land Schedule monitors take up of employment land across Fylde on an annual basis, recording new employment development on allocated employment sites and existing employment sites under policy EC1. It lists available land at each site and details appropriate use classes at each, with further details given on take up on non-employment windfall sites under policy EC2.

The document summarises relevant planning policy and background documents relating to employment land and details take-up over the plan period.

The document concludes that employment land take up since 2011 has been significantly lower than the expected take up of 2.28ha per annum and recommends a revised OAN of 16.6ha to 2042 (0.83ha per annum). This is on the basis that 40.32ha of employment land was projected to be taken up between 2011 and 2025, however only 10.764ha has been brought forward.

Fylde Council Business & Industrial Land Schedule (2026)

The Business and Industrial Land Schedule 2026 provides an updated position on employment land take-up between 1st April 2025 and 31st March 2026. Findings show that 2.23 hectares of allocated employment land was taken up over the year, with 53.755 hectares of employment land now being available. The total take up over the plan period is updated to 12.994ha, which is lower than the expected figure of 43.2ha.

Conclusions/New Issues

The new Local Plan should continue with a policy that sets out employment land allocations in accordance with NPPF paragraphs 20b and 23. This is to deliver strategic priorities and to address the objectively assessed need for employment land over the plan period. In respect of NPPF section 6: Building a strong, competitive economy the relevant Local Plan policies are EC1: Overall Provision of Employment Land, Existing Employment Sites and EC2: Employment Opportunities and elements of EC6: Leisure, Culture and Tourism Development in relation to the rural economy.

In the Council's experience, policy EC1 has not been effective because it relates to use classes which have since changed from when the plan was originally adopted. It must refer to actual

uses, as the use classes mentioned in the policy are out of date. Policy must be specific and brought up to date with the current use classes order.

EC1 cross references against Policy GD8: Demonstrating Viability. The way policy is worded it says that land should be retained as employment land within the acceptable uses listed unless there is no reasonable prospect of the site being used for those purposes, having satisfied the tests of GD8. The policy needs to distinguish between land that has been developed and land that has not been developed. Employment land that is available now could later become available again and the site may be discounted incorrectly for being unavailable.

Policy should seek to protect existing employment sites as has been with policy EC1. This is based off the recommendations of the Fylde Coast Employment Land Review whereby the strong demand for industrial and office units is signalled by the high occupancy rates. This is to ensure that businesses can find adequate space to meet their needs, whereby existing employment sites warrant protection in the new Local Plan. This further extends to employment opportunities outside of identified employment sites, where premises should be retained.

The need for a policy for unallocated employment sites will always remain, however it would be better if policy sets out what development is expected as the current policy EC2 is not flexible enough as it stands. Expectations on and flexibility towards acceptable uses are needed. There are occasionally applications received outside of identified employment sites, these being smaller scale proposals in the rural areas. Large warehouses in the rural areas are uncommon and not a critical concern however, and such proposals are usually determined by the rural diversification policy. Overall, employment applications in rural areas don't tend to come forward often. Self-storage uses can come forward on farms, but employment land is low value and farmers diversify into other uses.

Despite a 27ha headroom in employment land there is a clear demand in Fylde for small industrial units under 500m² which is not currently being provided for. This could be accommodated at the Bradkirk Hall farm industrial estate that benefits from proximity to the M55 corridor the site, being a requirement raised in the Employment Land review. Bradkirk Hall Farm is somewhat unauthorised, but it is an obvious place to allocate for employment land for being in proximity to the motorway network and to support the delivery of the Kirkham and Wesham Strategic Location for Development (strategic policy SLD4).

It would be a suitable and sustainable location for meeting industrial and warehousing requirements, particularly given the need for employment land around this area. It is therefore recommended that Bradkirk Hall Farm is allocated as an employment site in the new Local Plan. The Council must be aware of future housing development coming forward in the vicinity of Bradkirk Hall Farm should the site be allocated. The Council could allocate what is already there but need to be aware of current and future housing developments that are

coming forward, which could influence the direction in which Bradkirk Hall business park can be expanded.

Leisure and Tourism Economy

Tourism, agriculture and the rural economy have been traditionally strong sectors within Fylde, however the Local Plan acknowledges the importance of development being sensitive to its surroundings and that it should not compromise the area's character, ecology or heritage.

Local Policy

Strategic Policy GD4: Development in the Countryside

Policy GD4 lists permitted development in the identified countryside area and includes small scale tourism accommodation, holiday caravans and, in exceptional circumstances, larger scale tourism development. It requires development to respect the character of the area and be sensitive to its surroundings, supporting the reuse and/or rehabilitation of existing permanent and substantial dwellings. The policy supports the principles of rural diversification and permits development required for meeting local business needs, horticulture, forestry and other uses appropriate to rural areas that enable rural diversification.

Strategic Policy EC6: Leisure, Culture and Tourism Development

Policy EC6 acknowledges the importance of the tourism economy for Fylde and the historic seaside resort experience on offer. It outlines the potential of the borough's heritage assets to promote sustainable tourism, advocating protection of seaside resort facilities. The policy recognises and makes provisions for redevelopment of the Island seafront area and reconstruction of coastal sea defences to promote tourism. EC6 further encourages daytime and evening tourism through planning for leisure, cultural and heritage assets and identifies rural tourism as a key opportunity. Rural tourism requires better promotion, where the policy encourages rural diversification to create small-scale, sensitively designed visitor attractions that take advantage of the borough's natural and heritage assets. Policy EC6 further allocates Ribby hall Holiday Village as a site for rural tourism and allows additional leisure, culture and tourism uses within the site boundary, provided that these preserve and enhance the character of the site.

Non-strategic Policy EC7: Tourism Accommodation

Policy EC7 encourages high quality serviced holiday accommodation in the St Annes holiday areas. Proposals should respect the area's character, amenity and not adversely affect any nature conservation assets. EC7 works to retain serviced holiday accommodation and avoid losses to non-serviced accommodation to other uses within the designated St Annes Holiday Areas. Similarly, it seeks to retain holiday caravan pitches for holiday use and resist residential uses, imposing conditions on planning approvals for additional holiday park homes and holiday caravan pitches.

National Policy

NPPF 2024 Section 6: Supporting a prosperous rural economy

The sub section supporting a rural economy forms part of, and should be read in conjunction to, section 6 of the framework: Building a strong competitive economy, that provides guidance on economic needs more generally. Supporting a prosperous rural economy follows the guiding principle in NPPF paragraph 85 that planning policies and decisions should be enabling and help create the conditions in which businesses can invest, expand and adapt.

Section 6 of the framework provides specific guidance with regards to the rural economy, requiring planning policies to enable the growth and expansion of all types of businesses in rural areas, encouraging rural diversification. Sustainable tourism and leisure developments must respect the character of the countryside and enable the retention and development of accessible local services. The framework further recognises that to meet local business and community needs in rural areas sites adjacent to or beyond the settlement boundary may be required. In these circumstances development needs to be sensitive to its surroundings, not have an unacceptable impact on local roads and exploit opportunities to make a location more sustainable. The framework encourages the use of previously developed land that is to meet business needs.

Draft NPPF 2025 Section 7: Building a strong effective economy

Decision making policy E4: Rural business development, supports the sustainable growth of rural business development in line with wider business support under policy E2. It encourages sustainable growth of rural businesses by rural diversification and specifically supports development proposing facilities for rural leisure and tourism (E4 1c). Paragraphs E4 2a and 2b replace paragraph 88c in the 2024 framework but remain consistent in encouraging the reuse of existing buildings and land and that development should respect the character of its surroundings.

Decision making policy S5: Principle of development outside settlements is closely related to the local policy GD4 regarding development permitted in the countryside.

In the Council's view, policy EC6: Leisure, Culture and Tourism Development is broad in scope as it relates to high-level, aspirational elements of tourism in the borough and then specifically talks about The Island site in St Annes and Ribby Hall near Wrea Green. A lot of EC6 is about general planning principles and it is not a policy that's been used to justify any development. The points in EC6 have limited scope as they are now covered in national Decision Making policies.

Evidence Base

St Anne's Town Centre Strategy and Masterplan: Stage 1 Visitor economy baseline report, February 2022 (Amion)

The Stage 1 Visitor Economy baseline report functions both to provide a business case for the St Annes masterplan and island site and as a showcase for the visitor economy in Fylde.

The study explains that domestic holiday tourism is the most important type of tourism to St Annes and the wider Fylde area and that St Annes had an all-time high of 3.33 million visitors in 2019, having an economic impact of £272 million. The tourism offer in Fylde is seen as more complimentary to that of Blackpool and provides a more relaxed offer. "Both Lytham and St Anne's have a gentler and more peaceful character than their vivacious neighbour, Blackpool, six miles to the north".

"The most popular market segment to Fylde are 'Habituals', who can be described as low spending, largely inactive, very traditional, reluctant to change and valuing relaxation, peace and quiet".

As a destination, St Annes is positioned and marketed as a classic seaside resort that leans into heritage assets from the Victorian and Edwardian eras and interwar years. This includes the Promenade Gardens, St Annes pier and Ashton Gardens, being popular visitor attractions that promote the conservation of and education on the area's history and culture. These heritage assets are indispensable for attracting large numbers of tourists and require protection and promotion in any Local Plan policies going forward to safeguard the visitor economy. The natural environment is also a significant attraction for tourists, including the sandy beaches and dunes at St Annes, Fairhaven Lake and the promenade gardens. Given the importance of the borough's natural and heritage assets, development that seeks to promote their use should be supported, whilst development that threatens their character, environment or setting should be refused.

The document makes further reference to the Island site at St Annes, which is identified as a key weakness of the promenade for its weak public spaces, lack of presence and for the multiple buildings and kiosks, with overall poor connectivity between the site and St Annes town centre. There is a need to rethink the island site, with opportunities for a multi-operator facility that complements the seasonal offer of the beach. Policy should seek to support redevelopment of the island as it is currently under-utilised.

Fylde Health Check and Centres Study (2022)

The Fylde Healthcheck and centres study details that the tourism role of Lytham St Annes and that it presents an opportunity for leisure growth. Amongst commercial leisure uses the document identifies scope for exploring additional cinema screens in Fylde and leisure facilities, with "St Annes being the most likely location for any such further development".

The document details that the tourism role of St Lytham Annes makes it suitable for accommodating additional leisure uses and leisure growth, “this may take the form of new concepts, which help create their own demand and draw customers in from a wider area”. Based on this, the Local Plan should include policy text that encourages new leisure uses in the town centres, key service centres and in local service centres. This is to reflect the importance of leisure uses for the vitality of Fylde’s centres, whereby the Local Plan policy text should support proposals for future leisure uses in Fylde’s centres and protect those existing ones. This is particularly true for St Annes as the healthcheck and centres study identifies the opportunity for leisure use development and expansion, bringing benefits to both residents and tourists and increasing evening activity. The study further acknowledges the St Annes Town Centre Strategy and Masterplan in that the Island site has poor connectivity with the town centre and that a new approach is needed for the Island.

St Anne’s on the Sea Town Centre Masterplan

The St Annes on Sea Town Centre Masterplan identifies a vision and strategy for the development of St Annes on Sea. This is to guide investment and development proposals and to inform planning decision making. The document identifies the current strengths, weaknesses, opportunities and threats of St Annes, whereby the masterplan has five key objectives:

- Revitalisation of the town centre through the encouragement of a more diverse mix of uses and by repurposing underused space;
- Regeneration of the Island site to fulfil its potential as an attractive, year-round leisure destination meeting the demands of target visitors, following planned improvements to coastal defences and associated public spaces
- Enhancement of the town centre and seafront arrival experience (or ‘gateways’) from key transport linkages including rail and road, both of which are expecting to benefit from network and service improvements in the coming years
- Creation of a strong connection between the town centre and the promenade (the ‘Pier Link’) to maximise the economic potential and synergies across the resort as a whole;
- Delivering high-quality and complementary pedestrian, cyclist and road environments with improved wayfinding and a clear design layout to promote connectivity and a sense of place for St-Anne’s-on-the-Sea.

In order to realise these objectives the master plan outlines seven key projects with differing degrees of intervention:

- Station Gateway

- The Square
- The pier link
- The pier
- The Island Site
- Promenade Gardens
- South gateway

A continuous theme in the document is reference to improvements which can be made to the Island site on the promenade at St Anne's. This is an area that is currently under-utilised but can be regenerated alongside the town centre to improve the leisure offer. It is an opportunity to make better use of a prime seafront location as there is currently poor pedestrian connection between the island site and the town centre. A complex tenancy structure is also a barrier to comprehensive development. From the findings of the masterplan, policy text should support and facilitate the redevelopment of the island site as a leisure facility that makes better use of this seafront asset.

The document also details poor connectivity between the town of St Annes and the beach and Island site as a weakness and warrants a rethink on how the site can be developed in the future.

Conclusions/New Issues

In the Council's experience, policy text promoting the Island site in St Annes would be useful and should make reference to the coastal defences. This should be included in the new Local Plan to guide the redevelopment of the area and should detail appropriate development that both fits with the existing leisure uses and better utilises this seafront asset. It should ensure that the character and existing heritage assets such as St Anne's pier are protected whilst improving connectivity with St Annes town centre.

The further development and modernisation of leisure facilities in St Annes is identified as an opportunity in the centres study, whereby modernising the leisure offer would create more activity in the evenings and could provide benefits for both tourists and residents. Policy should therefore support the development of further leisure uses this in the new Local Plan for the benefits it brings to Fylde's centres. This is particularly true given that "the leisure offer in St Anne's comprises a limited food and beverage offer, together with the recreational facilities provided at the Island site".

There are no particular areas where the Local Plan is looking to promote tourism but policy text on the rural holiday villages, including Windy Harbour holiday village, is warranted as this site is looking to be developed within the plan period. Windy Harbour holiday village is not currently detailed in any policy text, but it would benefit from an allocation similar to that of Ribby Hall Holiday Village in the existing policy EC6. To tie in with the ancillary development

expected at Windy Harbour holiday village a policy that allows for different styles of holiday accommodation would be advantageous.

The new Local Plan going forward should introduce a policy on the development of rural holiday parks including Windy Harbour Holiday Park, Little Singleton and Newton Hall. This should take the form of an allocation-style policy similar to that of Ribby Hall within the existing policy EC6, for the purposes of supporting ancillary development coming forward on site over the Local Plan period. The policy should set out acceptable development and also allow for different styles of holiday accommodation.

The New Local Plan should introduce a policy that deals with Airbnb holiday accommodation to provide greater control for Planning Officers when determining proposals. The policy should distinguish Airbnb style holiday lets from existing holiday accommodation and permit it on the basis that they are sustainable development and that local amenities will be protected. This is to address changes that have come into effect following the adoption of the Local Plan to 2032 incorporating partial review, providing an essential update to the current policy guidance.

Policy text addressing Airbnb type accommodation and short term holiday lets would also be helpful in the new Local Plan as greater control over this type of accommodation is needed. Planning applications for holiday lets and aparthotels are received mainly in St Annes and the countryside areas.

Policy EC7: Tourism Accommodation works well for protecting the existing holiday accommodation provision in St Annes, but in terms of dealing with applications these are surfacing everywhere and it is unhelpful for determining applications outside of the holiday areas. Airbnb proposals are exclusively coming forward outside of the holiday accommodation areas and existing policy EC7 is more concerned with protecting the existing holiday accommodation in St Annes by designating these areas in policy. EC7 protects what accommodation is already there rather than being able to manage new development. It would be helpful to have a broad policy that distinguishes Airbnb and permits it so long as it protects local amenities. In the Council's experience, applications for Airbnb accommodation currently come forward as sui generis, but sometimes they come forward as class C1 hotels.

Alternative uses within the holiday accommodation areas in EC7 are not an issue as these areas are fully built out, so you tend to not get non-holiday accommodation uses here. Consequently, this policy will stay largely unchanged in the new Local Plan.

The Local Plan policy covering development in the countryside (currently policy GD4) needs reworking to provide greater clarity on what constitutes small scale tourist accommodation. It may be appropriate to define the scale of development based on increases in floorspace, where Planning Officers would greatly benefit from policy setting out the definitions of small, medium and large-scale development.

In the Council's experience, a shortcoming of Policy GD4: Development in the Countryside is a gap in the policy text where it mentions small scale tourism accommodation and large scale tourism development, but there are no provisions covering the middle ground. There is no sliding scale whereby the policy grammar could be clearer in defining what small scale is. It may be appropriate to look at percentage increases, for example a 25% increase in the site area or other similar factors.

GD4 further needs to have a subsection of the policy on how we will deal with applications on caravan sites, whether it be new caravan sites or the expansion of existing sites. The policy as it stands is heavily focused on tourist attractions and activities, whereas planning applications received are more concerned with holiday accommodation and places to stay. It is rarely about new tourist attractions, of which would just be dealt with through existing policy. The policy should give greater attention to rural holiday accommodation to compliment existing guidance on tourist attractions.

It is acknowledged that applications for residential uses on caravan sites are rare, where applicants instead go through the route of certificates of lawfulness to say that the use has been established. Individuals living in holiday homes has always been an issue but overall, the impact of these caravans is minimal.

Finally, in respect of the rural economy, Local Plan policy EC6: supporting a prosperous rural economy is most relevant to the NPPF section 6: Supporting a prosperous rural economy. There have been no significant changes between the latest framework (2024) and the 2019 framework in which the Local Plan to 2032 (incorporating partial review) was prepared under. As the text and requirements of the framework remain unchanged Policy is compliant with the requirements of the most up to date framework.

Regarding the 2025 NPPF draft consultation elements of Local Plan policy EC6: Leisure, Culture and Tourism Development are now covered under decision making policy E4: Rural Business Development. Support for rural diversification as part of rural tourism is covered by the framework and the reuse and conversion of existing buildings to support rural business growth. So as not to duplicate the decision making policy E4 in the 2025 draft framework it is suggested that text within EC6 relating to these matters is removed.



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