



Fylde Local Plan to 2042

The Statement of Regulation 18 Consultation (Regulation 22(1)(c)(i-iv) document)

September 2026

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Introduction

This Statement of Consultation is produced to accompany the Fylde Local Plan Publication Version, at the stage of its submission to the Secretary of State for Examination in Public. The document has been prepared in accordance with Regulation 22(1)(c)(i), (ii), (iii) and (iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

As required by regulation 22, the document sets out (i) which bodies and persons were invited to make such representations under regulation 18, (ii) how those bodies and persons were invited to make such representations, (iii) a summary of the main issues raised by those representations, and (iv) how those main issues have been addressed in the Local Plan Publication Version.

A separate document provides the information required by Regulation 22(1)(c)(v) and (vi) in relation to the Regulation 20 consultation.

The document also confirms that the consultations have been carried out in accordance with the Council's Statement of Community Involvement (SCI).

The Fylde Local Plan

Future development within Fylde will be guided by the plans and policies within the new Local Plan for Fylde, which runs from 1st April 2032 to 31st March 2042. The Fylde Local Plan to 2042 includes Strategic and Non-Strategic Allocations for new homes and employment land, sites for Gypsies, Travellers and Travelling Showpeople, leisure, retail, tourism and community use, or a mixture of such uses. The plan also comprises Development Management Policies, which will inform decisions on planning applications and appeals; together with policies to protect the natural and built environment and heritage assets.

Preparation of the Fylde Local Plan commenced in 2025 with an Options, Issues, Vision and Scope consultation (Regulation 18 plan) that ran from September to October 2025.

The following sections give a brief description of the document, a description of how the consultation was undertaken, and how the responses were taken account of in the next stage of the plan. The consultation materials and responses reports are included in the main body of the document.

Options, Issues, Vision and Scope 2025

The 'Options, Issues, Vision and Scope' consultation, undertaken for six weeks until the 30th October 2025, was the first consultation on the Fylde Local Plan to 2042. The Local Plan is to cover the period 1st April 2032 to 31st March 2042, being the key strategic document to guide planning matters in Fylde, allocating land, designating protected areas and informing planning decisions. It contains a vision, objectives and delivery strategy, as follows:

- The overall **vision**, informed by an analysis of key issues, to set out how the borough and the places within it should develop
- The strategic **objectives** to expand the vision into key specific issues which need to be addressed
- The **delivery strategy** to set out how the objectives will be achieved, including how much development is intended to happen where, when, and by what means it will be delivered

The purpose of the consultation was:

- To seek views on the main planning policy issues facing the borough to 2042
- To seek views on what the future vision of Fylde should include and look like
- To seek views on the objectives to address the issues identified

Comments received were summarised and used to produce and inform the Regulation 19 Publication Version of the Local Plan. This is to be the final draft of the Local Plan prior to submission to the secretary of state for independent examination.

The issues were updated to take account of the comments received during the consultation and evidence was gathered to verify new issues that arose. As the Local Plan had to be supported by robust evidence, issues that could not be supported were removed.

Methods of Consultation

The consultation was undertaken using a variety of methods in order to contact a wide range of people, as set out below:

Who was consulted?

Individuals and stakeholders on the Register of Consultees

The Register of Consultees is a database kept and updated by the Planning Policy Department. It is used for consultations on all Planning Policy Documents.

All individuals and stakeholders on the Planning Policy Register of Consultees were contacted by email and letter (the Register of Consultees is a database of over 1,000 individuals and stakeholders who the Planning Policy Team regularly consults on Local Development Framework (LDF) matters). Written representations could be submitted via email or post, or via completing an online response form via the Council's website. Copies of the letter and email inviting representations on the Local Plan to 2042 are available in appendix 2 and appendix 3 respectively.

All individuals and groups who were already included in the Register of Consultees were consulted, this included:

All those that we are required to consult by the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009;

- Government Departments;
- Elected Councillors;
- Town and Parish Councils;
- Planning agents; and
- Local residents and businesses who have registered their interest in being involved in planning policy consultation.

A total of 497 letters and 575 emails were sent to consultees, whereby a total of 1,072 consultees on the database were contacted. The table in appendix 4 shows the split of letters sent amongst different groups in the consultation database. The split for emails sent to different consultees groups is not available, however.

The General Public

The consultation targeted the general public through the following methods:

- Drop-in events to engage the general community were held at 9 venues across the borough between the dates of 6th October and 22nd October 2025. Leaflets and copies

of the Options, Issues, Vision and Scope version of the Local Plan were made available at each venue for inspection.

- Posters advertising the drop-in events were displayed at a range of locations. This includes the 9 venues hosting the drop-in events. In total, 50 posters were displayed across the following locations:

- Wesham Community Centre
- Lytham Institute
- Staining Village Hall
- Warton Village Hall
- Wrea Green Community Centre
- West Lodge, Ashton Gardens
- Singleton Village Hall
- Freckleton Village Memorial Hall
- Fairhaven Lake Water Sports Centre
- Wesham Post Office
- Kirkham Community Centre
- Morrisons, Kirkham
- Freckleton Library
- Nisa convenience store, Freckleton
- Lytham Library
- Ansdell Library
- St Annes Library
- Poulton Community Centre, Queensway
- St Annes Town Hall and Public Offices

As part of the consultation printed versions of the Options, Issues, Vision and Scope version of the Local Plan were also made available for inspection at the libraries in St Annes, Ansdell, Lytham, Freckleton and Kirkham, and at the Town Hall, St Annes Road West, Lytham St Annes. A copy of the poster used to advertise the drop-in events is available to view in appendix 1.

The nine consultation events were held at the following locations and dates. The number of attendees is also included:

- Monday 6th October 2025, 14:00 – 17:00, Wesham Community Centre. 10 attendees.
- Thursday 9th October 2025, 15:30 – 19:30, Lytham Institute. 1 attendee.
- Friday 10th October 2025, 15:00 – 19:00, Staining Village Hall. 0 (zero) attendees.
- Monday 13th October 2025, 12:00-16:00, Warton Village Hall. 25 attendees.
- Tuesday 14th October 2025, 15:30 – 19:30, Wrea Green Community Centre. 40 attendees.

- Wednesday 15th October 2025, 11:30 – 15:30, West Lodge, Ashton Gardens. 6 attendees.
- Thursday 16th October 2025, 15:30 – 19:30, Singleton Village Hall. 15 attendees.
- Wednesday 22nd October 2025, 14:30 – 18:30, Fairhaven Lake Water Sports Centre. 25 attendees.

The total number of attendees across the consultation events was 125 individuals.

Information boards were displayed at the consultation events that explained the purpose of the consultation, the purpose of the Local Plan and the need for a new Fylde Local Plan. Copies of the display boards used at the drop-in events are available to view in appendix 5.

A timetable for the production of the Local Plan was displayed along with a link to the Local Plan Vision and Spatial Portrait of current issues relevant to the borough.

The current Local Plan approach to development outside of settlements was given as was the current approach to heritage assets. Key issues relating to town district and neighbourhood centres, areas outside of settlements and heritage assets were also detailed.

Different options for the development strategy were provided:

1. Existing Development Strategy Updated. This involves continuing with the current development strategy with minor updates.
2. Variation of the existing development strategy. This could for example include a new strategic location near the boundary with Preston or Wyre at Poulton or a removal of one of the existing four strategic locations.
3. Entirely new development strategy that could for example involve new settlements.

The consultation events invited views on the future development strategy to be pursued in the Local plan to 2042.

Regarding the above options attendees were encouraged to place stickers on maps of the borough on those settlements which they felt should be designated as strategic locations where growth is to be focused in Fylde.

In relation to option 2 which proposes a variant on the existing spatial strategy, attendees were asked to place spots on the map of Fylde for where they thought strategic locations for development should be. This was also repeated for option 3 that proposes an entirely new development strategy, where attendees placed stars on a map of Fylde for where they felt the new strategic locations should be in the borough.

These information boards served as a data gathering exercise to seek views on where strategic locations should be. The results have not influenced the final development strategy proposed in the publication version of the Fylde Local Plan to 2042. The information boards used at the consultation events with the results of the maps can be found in appendix 5.

Communications Campaign Report

The following section summarises the media used to raise awareness of the consultation.. The consultation was advertised through the Council's weekly Saturday email newsletter and via the Council's social media channels.

Campaign Overview

Campaign Period: 18 September-30 October 2025

Key Messages

- "Have Your Say" - Empowering residents to shape Fylde's future
- "Shape Fylde's Future" - Emphasising long-term community impact
- Focus on accessibility with multiple consultation events across the borough

Visual Identity

The campaign featured distinctive green branding with aerial photography of St Annes and local areas, creating an immediate local connection and professional appearance that stood out across all channels.

Channel Performance Analysis

1. Newsletter Communications

Platform: Weekly Saturday email newsletter

Subscriber Base: 5,500 subscribers

Performance Metrics

Date	Content Type	Clicks	Click Rate
20/09/2025	First PR mention	368	16.1%
27/09/2025	Feature article	126	7.9%
04/10/2025	Events feature	80	6.2%
11/10/2025	Events feature	87	6.0%
18/10/2025	Events feature	99	5.4%
25/10/2025	Events feature	27	2.0%

Total Newsletter Clicks: 787

Average Click Rate: 7.3%

A copy of the weekly Saturday email newsletter is available to view in appendix 8.

2. Social Media Campaign

Campaign Period: 13 September-29 October 2025

Total Posts: 28 across all platforms

Platform Performance

Facebook

- Impressions: 15,803
- Total Engagement: 1,399
- Engagement Rate: 4.12%
- Shares: 37
- Likes: 17
- Comments: 2

Instagram

- Views: 1,996
- Total Engagement: 6
- Comments: 2
- Shares: 1
- Saves: 2

Copies of the Facebook Social Media Post are available to view in appendix 10 and copies of the Instagram Social Media Post are available to view in appendix 11.

3. Physical Communications

Poster Distribution: 50 posters placed at consultation event venues. The Options, Issues, Vision and Scope Consultation Poster is available to view in appendix 1.

- Strategic placement at all 9 consultation locations

Campaign Metrics Summary

Channel	Reach/Subscribers	Engagements	Engagement Rate
Newsletter	5,500	787 clicks	7.3%
Facebook	15,803 impressions	1,399	4.12%
Instagram	1,996 views	6	0.3%
Physical	50 posters	N/A	N/A

Conclusion

The Local Plan consultation communications campaign successfully raised awareness and drove engagement across Fylde, with particularly strong performance through the council newsletter and Facebook channels. The campaign achieved its primary objective of informing

residents about consultation opportunities, as evidenced by 787 newsletter clicks and over 1,400 social media engagements.

The multi-channel approach ensured comprehensive coverage across different demographic groups, while the consistent visual identity strengthened campaign recognition. For future consultations, focusing on maintaining late-stage momentum and enhancing interactive elements will further improve resident participation.

Copies of the Press Release and Press Notice are available to view in appendix 6 and appendix 7 respectively. The consultation was also advertised on the Fylde Council webpage in the news items section and is available to view in appendix 9.

Responses to the Consultation

68 responses were received towards the Options, Issues, Vision and Scope version of the Local Plan from a range of individuals, organisations, statutory consultees and agents acting on behalf of others. Responses were made through the online form on the Fylde Council website as well as via email submissions directly to the Planning Policy team email inbox (planningpolicy@fylde.gov.uk).

A summary of the responses received is available to view in the following section.

Summary of Responses

A summary of the issues raised by representors in the Options, Issues, Vision and Scope' consultation is provided below:

- Questions 1 – 2 asked whether the Council should produce a new or amended Local Plan and what form this should take. There was overwhelming support that a new Local Plan should be produced, mainly due to the current policies becoming out of date. Respondents favoured a review with additional allocations over an entirely new plan produced from scratch to ensure a degree of policy continuity. The Council acknowledged these comments.
- Questions 3-5 addressed the spatial portrait, asking if there is anything missing which should be added and for any suggested amendments. Of those who answered there was an even split as to the spatial vision being comprehensive and having missing elements. Other comments include demographic pressure and the need for continued housing development and to provide housing for young, working families to prevent an ageing population. The Local Plan has addressed this issue in its policies.
- Questions 6 and 7 ask whether the 2042 Vision is supported and whether there are any changes required to the vision. There was a strong level of support for the vision, with only a few representors not commenting. Suggested changes included distributing housing growth more evenly across the borough, to which the Council responded by detailing development is being directed to the most sustainable locations. There is strong emphasis on meeting housing needs whereby the Council has allocated sites accordingly.
- Question 8 asks whether Option 1: Retaining the existing development strategy with updates is supported. Comments praised the continuity of this option and that it concentrates development in the most sustainable locations. Comments highlighted that development at Whitehills would relieve development pressure in more sensitive locations, although some felt there are growth opportunities which would remain

unexplored if this option was pursued. The Council highlighted the sustainability benefits of concentrating growth in the four strategic locations as per option 1.

- Questions 9, 10 and 11 collect views on whether Option 2 of the development strategy, varying the existing strategy, would be supported. There was scepticism towards option 2 for being less sustainable. The Council response was that the size and connectivity of existing places and the service provision available in settlements are key considerations in where growth is to be directed. The strategy for directing where new development and investment will be located is set against a backdrop of underlying development trends.
- Questions 12, 13, 14 15 and 16 collect views on whether development strategy option 3 is supported. This includes asking where strategic locations for growth would be located. There was little support for this option for its uncertainty, being unsustainable and respondents were against green belt release. The Council responded by noting how there is sufficient land to meet its needs that does not lie in the Green Belt, and that no exceptional circumstances exist to justify a strategic review of the Green Belt. Again, future development is set against a backdrop of underlying development trends.
- Questions 17 to 18 gather views on what the housing requirement should be in the new Fylde local plan to 2042 and why. The most popular choice was a figure lower than 410 homes per year due to factors surrounding infrastructure constraints. The Council response was that the up-to-date housing requirement is 416 dwellings per year which is higher than the current figure of 305. Access to accommodation is fundamental to quality of life and that an appropriate housing mix should be provided.
- Questions 19-20 concern how housing for older people and looked after children and adults with care support should be provided for. Comments raised that smaller properties should be provided to meet elderly needs and that adaptable homes cater to both the elderly and those requiring additional care. The Council response is to only grant permission for children's homes where it is demonstrated that the development will meet the unmet need of children from Lancashire and that on residential schemes of 20 or more dwellings 20% of dwellings will be marketed towards those over 55 years old.
- Questions 21 to 22 ask for views on how the Local Plan should provide for the need for additional gypsy and traveller pitches and whether they would support the release of exception sites in rural areas to support affordable housing and/or gypsies and traveller pitches. Most comments were against additional pitch provision although some supported exception sites. This is not the full picture however as commentators

raised that the plan should incorporate enough flexibility to do without exception sites. The Council response references the Gypsy and Traveller Accommodation Assessment (GTAA) where proposals for new sites will only be permitted if they satisfy unmet need.

- Questions 23 and 24 cover the three strategic employment sites proposed – whether these site-specific policies are warranted and whether there are further strategic employment sites that need designating. There was a high level of support for BAE Warton, Blackpool Airport EZ and Westinghouse Springfields. The only additional site mentioned was to designate the Warton Land Registry. The Council supported these comments, and it was raised that the additional Warton Land Registry is already designated as an existing employment site.
- Questions 25 through to 28 concern the existing employment allocations, whether their protection is supported and any additional comments on how the new Local Plan should meet employment land needs. There was almost equal support between continuing with existing employment allocations and having a combination of existing and new allocations. The Council has therefore rolled forward the existing allocations in the new plan whilst allocating Land south of Brackirk Business Park, Wesham as a new employment site. There was widespread support for protecting existing employment areas from redevelopment to alternative uses.
- Questions 29 and 30 cover protections for coastal areas, whether they are effective and whether there are unresolved conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade. Representors felt that the current protections are suitable and that environmental protections should be prioritised over recreational use. Others felt that a balance could be struck as part of a positive management strategy, where the Council has policy ENT7: Coastal Change Management Areas that permits sustainable development in the coastal areas provided that it is appropriate for a coastal location and promotes the conservation, restoration and enhancement of the coastline.
- Questions 31, 32 and 33 concern the designation of additional conservation areas, views towards heritage protection and whether the Council consider designating additional non-designated assets in the Borough. Comments support additional conservation areas where there is sufficient evidence to justify their designation and there was recognition that heritage conservation can be an income source, although it shouldn't constrain development. There were mixed views on additional non-designated assets in the borough as there is already an abundance, where the council response was that the historic environment is to be reviewed going forward.

- Questions 34 through to 37 gather views on whether town centres should be extended to meet additional retail for convenience retail and where additional convenience retail should be provided. It asks should specific requirements be set in applying the sequential test for identifying town centre uses and whether smaller neighbourhood centres should be identified. Comments noted that the town centres should not be extended and any new additional retail provision should be provided at Whitehills for its lack of facilities. Some comments support the setting of additional requirements in applying the sequential test whilst others said to simply refer to the framework. Comments supported the designation of neighbourhood centres and the Council has subsequently added these into the Local Plan and taken the comments onboard.
- Question 38 asks whether there are additional open spaces that require protection through local green space designation, whereby suggestions were limited. Under question 39 there was overwhelming support for option a) retain protection of existing identified open spaces through Local Plan policy and for question 40 most support was for the revision of policy to allow a wider range of types of open space including more natural green space. The Council has taken these comments onboard in the Local Plan.
- Question 41 asks whether representors supported the Council's proposal that the green belt should not be reviewed. Responses were mixed, with some noting that green belt land should be released for economic growth and others noting it's ecological value and that green belt release is not significant enough to meet growth requirements as Fylde's green belt is so small. The decision was that the green belt is not being reviewed as part of the Local Plan to 2042 as the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde.
- Questions 42 to 44 ask about supporting the continued identification of areas of separation in the Local Plan going forward, whether there is a need to review the boundaries of the areas of separation and whether there are additional areas in which the area of separation designation should apply. Comments supported the continued identification of the areas of separation for preventing coalescence and maintaining settlement's identity but cautioned that it should not restrict the development planned in the borough going forward. Most responses opted for a review of the areas of separation and there was support for additional areas of separation to be designated around Warton.
- Question 45 asks about whether the three-tier system of Green Belt, Areas of Separation and Countryside areas is supported and question 46 asks for further comments on how the Local Plan policies should operate outside of the settlement boundaries. Comments generally supported the three-tier system and that it should

be retained, although additional comments under question 46 showed that areas of separation in particular were not valued. Respondents felt that areas of separation were cumbersome as they did not afford a great level of protection and that these areas should instead be designated as green belt. Greater flexibility over the designations was valued by respondents with some advocating for greater windfall development and for each application to be considered on its own merits.

- Questions 47 to 48 deal with infrastructure provision in the Local plan and whether respondents support the Council's general approach to infrastructure provision. Respondents noted the importance of having sufficient infrastructure provision and generally supported the Council's approach. However, respondents sought additional provision for healthcare facilities, schools and improved highways, particularly M55 junctions 3 and 4. Under policy IFR4: Transport Infrastructure Projects, the council will support measures to improve the A585 and M55 junction 3 and delivery of the T5 Link Road on the strategic road network. Development that would compromise the delivery of these schemes will not be permitted.
- Furthermore, questions 49 and 50 sought comments on additional transport schemes that should be investigated to support the local plan and any further comments regarding transport and infrastructure provision. Comments sought an improvement to the railway service on the South Fylde line including provision of a passing loop. In addition, comments were received regarding the M55 junctions 3 and 4 and that consideration should be given to how future development will impact their capacity. The Council is investigating the impacts of new development to 2042 on the likely usage of the M55 junction 3. Under policy IFR4 the council will support measures to improve the M55 junction 3 and the A585.
- Questions 51-54 cover design policies, whether there should be a single design policy or policies for different elements of design. It further asks whether specific design considerations should apply, and if so where. It finally discusses the need for design codes, where they should apply and how masterplanning of strategic sites should be undertaken. Some responses favoured a single policy for certainty and consolidating design guidance whilst others valued separate policies for flexibility and that these could be applied to specific areas, although responses felt that rural areas could benefit most from specific design considerations. The masterplanning of strategic sites should take local knowledge into account and encourage active travel. Some views supported the use of design guides but that they must not become too rigid and that design should encourage innovation and have flexibility.
- Questions 55 to 56 discuss surface water runoff and whether respondents support the requirement of no greater runoff than greenfield rates. This was supported in

representations, particularly given Fylde's low-lying landscape and existing flood issues. Question 56 asked if representors supported the Council's approach to site selection, considering all sources of flood risk. Again, comments supported the Council's current approach where all sources of flooding are to be considered.

- Questions 57 to 58 discuss the current renewable energy policy, whether it should be retained and whether there are areas in the borough that particular types of renewable energy development should not occur. Respondents generally supported the current policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts. The areas where renewable energy development should not take place include in the vicinity of ancient woodland or veteran trees and other irreplaceable habitats.
- Question 59 asks if the new Local Plan should retain the sequential approach to the use of agricultural land for renewable energy projects. Most comments supported the use of the sequential approach, arguing that the lowest grade agricultural land should be used for renewable energy projects to protect domestic food production.
- Question 60 asks whether a whole-life-carbon approach should be taken in assessing building efficiency. Most responses advocated for this approach but raised concerns on how it would be monitored and that it should not compromise viability. Ultimately, the Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.
- Finally, questions 61 and 62 were open ended questions where representors could raise items which haven't been covered already and was an opportunity for further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042. One issue raised was the need to ensure that sufficient infrastructure is in place to support the planned housing growth in the borough, including schools, car parking and healthcare facilities. Having enough affordable housing to cater for NHS staff was also raised.
- With regards to housing, there were also comments advocating for additional housing sites to be allocated brought forward, where respondents raised the merits of their sites for inclusion in the plan going for forward. Comments raised the need for additional guidance on Biodiversity Net gain (BNG), to which separate BNG is being produced by the Council for applicants that will work alongside the Local Plan.

The following section shows the representations received in full and the Council's response to the points raised.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
Alban Cassidy	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Anna Briggs	Yes	A completely new Local Plan with entirely new policies decided from scratch?	n/a	Comments noted
Bryning with Warton Parish Council	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Christine Abbott	Yes	Other (please state)	I would not support additional allocations.	Comments noted
Claire Parker for Blackpool Council	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
David Chedd	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Emma Swindells	Yes	A completely new Local Plan with entirely new policies decided from scratch?	n/a	Comments noted

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
Ethan Ellison	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Frank Andrews	No	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Frank Andrews	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Gerard Malone	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Hannah Dell'Armi	No	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Haydn Payne (on behalf of the Caravan and Motorhome Club)	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Irene Jacques	No	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted

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John Leadbeater	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
John Maskell	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Keith Gorton	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Keith McKay	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Linda Nulty	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Luke Banks	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Lytham St Annes Civic Society	Yes	A completely new Local Plan with entirely new policies decided from scratch?	n/a	Comments noted

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
Marcus Dowling	Yes	A completely new Local Plan with entirely new policies decided from scratch?	n/a	Comments noted
Martin Alderman	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Mrs B Wildish	Yes	n/a	n/a	Comments noted
P Stanford	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Philip Bickerstaff	Yes	A completely new Local Plan with entirely new policies decided from scratch?	n/a	Comments noted
Stephen and Jacqueline Croft	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Steven Abbott	Yes	A completely new Local Plan with entirely new policies decided from scratch?	n/a	Comments noted

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Susan Lee	Yes	A reviewed Local Plan with additional allocations to extend to 2042?	n/a	Comments noted
Asteer Planning for Applethwaite	Yes	A completely new Local Plan with entirely new policies decided from scratch?	Applethwaite strongly considers that Fylde Council should produce a new Local Plan with entirely new policies decided from scratch, given the new policy environment within which the plan sits following the introduction of the new NPPF in December 2024 and the re-introduction of mandatory housing targets. Given the significant increase in housing requirement, it is considered that this warrants a renewed new approach to holistically planning for the future development of Fylde, and ensuring that the overall pattern of development meets the Borough's needs. In addition, the strategic policies in a Local Plan are intrinsically linked,	Comments noted Sites submitted to the Council have been considered in the SHELAA

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
			such as the synergy between housing and economic growth, and therefore to fully understand the needs of the Borough during the next Plan Period, a full review should be considered. In any scenario, Applethwaite strongly considers that the site at Blackpool Road should be allocated for residential development as a deliverable, sustainable and suitable option to assist Fylde in meeting its significantly increased housing need.	
Emery Planning for Persimmon & Charles Church	2.1 We would suggest that the Council produces a new local plan rather than a review, although the key consideration is that the plan accords with the new Framework and addresses up-to-date housing need for the Borough together with any unmet need from neighbouring authorities.	2.1 We would suggest that the Council produces a new local plan rather than a review, although the key consideration is that the plan accords with the new Framework and addresses up-to-date housing need for the Borough together with any unmet need from neighbouring authorities.	n/a	Comments noted The borough is accommodating growth and there is a need for pace in plan-making. Whilst the NPPF refers to looking ahead 15 years, housing and economic needs are expected to change in a far shorter period. 13 years is realistic given the rapid pace of change and the

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	Duty to Cooperate 2.7 A key reason for a new local plan and not a review is the Duty to Cooperate and the need to plan for the Fylde Coast's housing needs comprehensively. We address this under the Housing Section, but the importance of the matter was recently raised at the Examination of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041. 2.8 Like Oxford in that case, Blackpool is heavily constrained in its ability to meet its housing needs, which the Inspectors set out in their letter dated 26th September 2025. They state: "15. There is a history of Oxford City not being able to meet its own housing need reflecting the constraints of the city, which is	2.2 Paragraph 22 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth: "Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery" 2.3 It also requires strategic policies to cover a 15-year plan period from		requirement for local planning authorities (LPA) to review local plans containing strategic policies every five years. The borough will meet its identified objectively assessed housing needs in full through the sufficient provision of housing allocations. The site allocations comprise a diverse portfolio of sites that will provide flexibility and choice. There is a need for pace in plan-making. The LPA cooperates and engages with neighbouring authorities through the Duty to Cooperate (DtC) and pausing the new LP simply to exactly align with the neighbouring LPAs timetables is not appropriate.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	encircled tightly by Green Belt and also due to a tightly drawn local authority boundary.” 2.9 The Inspectors then state: “50. In summary, potential unmet housing need for Oxford City beyond 2031/36 and how the JLP accommodates previously agreed unmet need are strategic matters and, therefore, fall under the DtC. Consequently, the Councils should have engaged constructively, actively and on an on-going basis on the issues. Whilst there were some early attempts at engagement, for the period between January 2024 and November 2024 meaningful engagement on this issue did not occur outside of the formal examination process. Consequently, the DtC in Section 33A of the 2004 Act has not been	adoption: 2.4 The Council’s proposed timetable for the adoption of the Local Plan is set out in the 2025 Local Development Scheme (January 2025) which is as follows: • Issues and Options Regulation 18 – August/September (ongoing but period now September/October. • Consultation Pre-Submission Plan (Publication stage) – May/June 2026 • Submission to Planning Inspectorate – by December 2026 2.5 On the basis of the Council’s LDS, assuming adoption in October 2027 which is part way through the first monitoring year, the minimum plan period will be the 31st March 2043 so that there is a full 15-year period at adoption. However, this assumes that there are no delays between now and then, which in our view is		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	met. This cannot be remedied during the examination of the plan.” 2.10 Therefore, the three authorities should have a clear understanding of the housing figure they should meet under the DtC at the outset of the plan review. The absence of such a figure in the current consultation should be addressed as soon as possible and a consultation on how that figure is to be met.	unrealistic. It is also important to note that Local Plan examinations have historically taken multiple years. Specific examples include the Cheshire East Local Plan Strategy which took over 3 years and the Halton Delivery and Allocations Plan which took 2 years. More recently, Planning Inspectors have paused public hearings being held as part of the examination into the Charnwood Local Plan 2021-2037. This demonstrates the issues and delays can take place during the examination process. This issue has also been recently by the Inspectors for the Wiltshire Local Plan and in their letter dated 27th February 2025 state: “The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period		

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		would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities. We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
		employment land to be identified.” 2.6 We consider that an element of flexibility is built in at the outset and the plan period should be to 2045. Duty to Cooperate 2.7 A key reason for a new local plan and not a review is the Duty to Cooperate and the need to plan for the Fylde Coast’s housing needs comprehensively. We address this under the Housing Section, but the importance of the matter was recently raised at the Examination of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041. 2.8 Like Oxford in that case, Blackpool is heavily constrained in its ability to meet its housing needs, which the Inspectors set out in their letter dated 26th September 2025. They state: “15. There is a history of		

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		Act has not been met. This cannot be remedied during the examination of the plan.” 2.10 Therefore, the three authorities should have a clear understanding of the housing figure they should meet under the DtC at the outset of the plan review. The absence of such a figure in the current consultation should be addressed as soon as possible and a consultation on how that figure is to be met. • Examination in Public – August 2026 • Adoption – October 2027.		
Emery Planning for Wain Homes (NW) Ltd	2.1 We would suggest that the Council produces a new local plan rather than a review, although the key consideration is that the plan accords with the new Framework and addresses up-to-date housing need for the Borough together	2.2 Paragraph 22 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth: “Strategic policies should look ahead over a minimum 15 year period from adoption14, to	n/a	Comments noted The borough is accommodating growth and there is a need for pace in plan-making. Whilst the NPPF refers to looking ahead 15 years, housing and economic needs are expected to change in a far shorter

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	with any unmet need from neighbouring authorities. Duty to Cooperate 2.7 A key reason for a new local plan and not a review is the Duty to Cooperate and the need to plan for the Fylde Coast's housing needs comprehensively. We address this under the Housing Section, but the importance of the matter was recently raised at the Examination of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041. 2.8 Like Oxford, Blackpool is heavily constrained in its ability to meet its housing needs, which the South Oxon Inspectors set out in their letter dated 26th September 2025. They state: "15. There is a history of Oxford City not being able to meet its own housing need	anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery¹⁵" 2.3 It also requires strategic policies to cover a 15-year plan period from adoption. 2.4 The Council's proposed timetable for the adoption of the Local Plan is set out in the 2025 Local Development Scheme (January 2025) which is as follows: • Issues and Options Regulation 18 –		period. 13 years is realistic given the rapid pace of change and the requirement for local planning authorities (LPA) to review local plans containing strategic policies every five years. The borough will meet its identified objectively assessed housing needs in full through the sufficient provision of housing allocations. The site allocations comprise a diverse portfolio of sites that will provide flexibility and choice. There is a need for pace in plan-making. The LPA cooperates and engages with neighbouring authorities through the Duty to Cooperate (DtC) and pausing the new LP simply to exactly align with the neighbouring LPAs timetables is not appropriate.

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Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	Consequently, the DtC in Section 33A of the 2004 Act has not been met. This cannot be remedied during the examination of the plan.” 2.10 Therefore, Fylde and Wyre should have a clear understanding of the housing figure they should meet under the DtC at the outset of the plan review. The absence of such a figure in the current consultation should be addressed as soon as possible and a consultation on how that figure is to be met.	which took over 3 years and the Halton Delivery and Allocations Plan which took 2 years. More recently, Planning Inspectors have paused public hearings being held as part of the examination into the Charnwood Local Plan 2021-2037. This demonstrates the issues and delays can take place during the examination process. This issue has also been recently by the Inspectors for the Wiltshire Local Plan and in their letter dated 27th February 2025 state: “The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15		

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		years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities. We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified.” 2.6 We consider that an element of		

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		flexibility is built in at the outset and the plan period should be to 2045. Duty to Cooperate 2.7 A key reason for a new local plan and not a review is the Duty to Cooperate and the need to plan for the Fylde Coast's housing needs comprehensively. We address this under the Housing Section, but the importance of the matter was recently raised at the Examination of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041. 2.8 Like Oxford, Blackpool is heavily constrained in its ability to meet its housing needs, which the South Oxon Inspectors set out in their letter dated 26th September 2025. They state: "15. There is a history of Oxford City not being able to meet its own housing need reflecting the constraints of the city, which is		

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		encircled tightly by Green Belt and also due to a tightly drawn local authority boundary.” 2.9 The Inspectors then state: “50. In summary, potential unmet housing need for Oxford City beyond 2031/36 and how the JLP accommodates previously agreed unmet need are strategic matters and, therefore, fall under the DtC. Consequently, the Councils should have engaged constructively, actively and on an on-going basis on the issues. Whilst there were some early attempts at engagement, for the period between January 2024 and November 2024 meaningful engagement on this issue did not occur outside of the formal examination process. Consequently, the DtC in Section 33A of the 2004 Act has not been met. This cannot be remedied during the examination of the plan.”		

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		2.10 Therefore, Fylde and Wyre should have a clear understanding of the housing figure they should meet under the DtC at the outset of the plan review. The absence of such a figure in the current consultation should be addressed as soon as possible and a consultation on how that figure is to be met.		
Gladman	4.2.1 Gladman supports the Council's decision to prepare a new Local Plan. At present, the Council's preferred approach is to review its existing Local Plan under the current plan-making system due to the process being quicker and more efficient. However, whilst Gladman acknowledges the importance of the Council adopting a new Local Plan as soon as possible, progressing one under the current plan-making system	n/a	n/a	Comments noted The borough is accommodating growth and there is a need for pace in plan-making. Whilst the NPPF refers to looking ahead 15 years, housing and economic needs are expected to change in a far shorter period. 13 years is realistic given the rapid pace of change and the requirement for local planning authorities (LPA) to review local

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	would be extremely challenging due to the extensive work required to develop a robust evidence base and the constrained timescales involved. 4.2.2The Government has set out that all local plans being progressed under the current plan-making system must be submitted for examination no later than December 2026. The Council's latest Local Development Scheme (LDS) was published in January 2025 and anticipates that a Regulation 19 Pre-Submission Local Plan consultation will take place between May and June 2026 and that the emerging Local Plan will be submitted to the Secretary of State for examination in August 2026. Gladman considers the timescales set out in the Council's latest LDS to be challenging due to the extensive work required to			plans containing strategic policies every five years.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	develop a robust evidence base. If the Council fails to reach the submission stage under the current plan-making system, there is a significant risk that existing work would need to be revised and consultations repeated to ensure legal compliance with the provisions of the Levelling-up and Regeneration Act 2023 (LURA). 4.2.3 As such, Gladman believes that the most appropriate approach available to the Council is to prepare a new Local Plan for the borough under the provisions of the LURA. Under the new plan-making system, the Council would be required to prepare and adopt a new Local Plan within 30 months. If this timeframe is met, a new Local Plan would be in place in the short to medium term. 4.2.4 The Council proposes that the new Local Plan covers the			

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	period up to 2042. Paragraph 22 of the NPPF sets out that strategic policies should look ahead over a minimum 15- year period from adoption and where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years). Gladman recommends that the new Local Plan covers the period up to 2045 at least to ensure it meets the minimum 15-year period from adoption taking into account potential plan-making delays. The Council will need to consider whether any proposed site allocations require the new Local Plan to cover a minimum 30-year period in line with national policy.			

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: - A reviewed Local Plan with additional allocations to extend to 2042? - A completely new Local Plan with entirely new policies decided from scratch? - Other (please state)?	(Other please state)	Council Response
Historic England	Historic England supports a Local Plan which conserves and enhances the historic environment, heritage assets and their setting.	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting.	n/a	Comment noted
Home Builders Federation	The Development of a new Local Plan 4. Given the changes to national planning policy through the latest National Planning Policy Framework (NPPF, 2024), the HBF considers that the Council may benefit from producing a new Local Plan rather than amending the existing Local Plan. Irrespective of this, the most important matter is that any new/reviewed Local Plan should pass the tests of soundness contained in paragraph 35 of the NPPF. In particular, that the plan seeks (as a minimum) to meet the area's housing needs	The Development of a new Local Plan 4. Given the changes to national planning policy through the latest National Planning Policy Framework (NPPF, 2024), the HBF considers that the Council may benefit from producing a new Local Plan rather than amending the existing Local Plan. Irrespective of this, the most important matter is that any new/reviewed Local Plan should pass the tests of soundness contained in paragraph 35 of the NPPF. In particular, that the plan seeks (as a minimum) to meet the area's housing needs over the plan period.	n/a	Comments noted The borough is accommodating growth and there is a need for pace in plan-making. Whilst the NPPF refers to looking ahead 15 years, housing and economic needs are expected to change in a far shorter period. 13 years is realistic given the rapid pace of change and the requirement for local planning authorities (LPA) to review local plans containing strategic policies every five years.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	over the plan period. 5. In addition to this, the Council will be aware that the NPPF is clear that Local Plans should have strategic policies which look ahead over a minimum 15 year period from adoption and where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) (paragraph 22). 6. The plan period is envisaged to run from 2024 – 2042 and the current Local Development Scheme (LDS), which was adopted in January 2025, envisages the adoption of the Local Plan by October 2027. This means that if the current timetable is adhered to, then the Council may only just be able to demonstrate a 15 year	5. In addition to this, the Council will be aware that the NPPF is clear that Local Plans should have strategic policies which look ahead over a minimum 15 year period from adoption and where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) (paragraph 22). 6. The plan period is envisaged to run from 2024 – 2042 and the current Local Development Scheme (LDS), which was adopted in January 2025, envisages the adoption of the Local Plan by October 2027. This means that if the current timetable is adhered to, then the Council may only just be able to demonstrate a 15-year plan period from adoption. However, any slippage in timescales will mean this will not be able to be		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	plan period from adoption. However, any slippage in timescales will mean this will not be able to be demonstrated, which will create a fundamental soundness issue with the plan. 7. Given that there is already some slippage in the timetable outlined in the LDS, the HBF recommends that the plan period is lengthened so that there is a sufficient buffer so that the 15 year minimum plan period from adoption can be achieved, even taking into account any possible de-lays.	demonstrated, which will create a fundamental soundness issue with the plan. 7. Given that there is already some slippage in the timetable outlined in the LDS, the HBF recommends that the plan period is lengthened so that there is a sufficient buffer so that the 15 year minimum plan period from adoption can be achieved, even taking into account any possible delays.		
Lichfields for Taylor Wimpey	Draft Fylde Local Plan to 2042 Taylor Wimpey welcomes the opportunity to respond to the strategy proposed by the Council for preparing its emerging Local Plan and acknowledges the	Draft Fylde Local Plan to 2042 Taylor Wimpey welcomes the opportunity to respond to the strategy proposed by the Council for preparing its emerging Local Plan and acknowledges the proactive	n/a	Comments noted The borough will meet its identified objectively assessed housing needs in full through the sufficient provision of housing allocations. The site allocations comprise a

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	proactive approach being taken to review the Plan ahead of its expiry in December 2026. It is noted that the Adopted Fylde Local Plan to 2032 already incorporates a partial review (adopted in December 2021), which reflected a reduced housing requirement. The majority of the policies and context within the Local Plan date back to the original adopted plan in 2018. The emerging Local Plan must now account for an updated housing requirement in line with Local Housing Need (LHN) calculated by the Standard Method, which sets a minimum requirement of 419 dwellings per annum—a significant increase from the adopted figure of 305 dwellings per annum (addressed in further detail in response to Question 17). This	approach being taken to review the Plan ahead of its expiry in December 2026. It is noted that the Adopted Fylde Local Plan to 2032 already incorporates a partial review (adopted in December 2021), which reflected a reduced housing requirement. The majority of the policies and context within the Local Plan date back to the original adopted plan in 2018. The emerging Local Plan must now account for an updated housing requirement in line with Local Housing Need (LHN) calculated by the Standard Method, which sets a minimum requirement of 419 dwellings per annum—a significant increase from the adopted figure of 305 dwellings per annum (addressed in further detail in response to Question 17). This represents a significant departure		diverse portfolio of sites that will provide flexibility and choice. The borough is accommodating growth and there is a need for pace in plan-making. Whilst the NPPF refers to looking ahead 15 years, housing and economic needs are expected to change in a far shorter period. 13 years is realistic given the rapid pace of change and the requirement for local planning authorities (LPA) to review local plans containing strategic policies every five years.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	represents a significant departure from the adopted Local Plan and a further review is not considered to be a robust approach in these circumstance. The Planning Inspectorate has already established that the Council cannot demonstrate a five-year housing land supply (Appeal Ref: APP/M2325/W/25/3360376) and as such, the presumption in favour of sustainable development now applies. Slow delivery at longstanding and complex allocations is considered to be a contributing factor in the Council not being able to deliver new housing as anticipated from a timescale perspective. While the Council may seek to retain many of these allocations in the emerging Local Plan, Taylor Wimpey considers that a simple review of	from the adopted Local Plan and a further review is not considered to be a robust approach in these circumstance. The Planning Inspectorate has already established that the Council cannot demonstrate a five-year housing land supply (Appeal Ref: APP/M2325/W/25/3360376) and as such, the presumption in favour of sustainable development now applies. Slow delivery at longstanding and complex allocations is considered to be a contributing factor in the Council not being able to deliver new housing as anticipated from a timescale perspective. While the Council may seek to retain many of these allocations in the emerging Local Plan, Taylor Wimpey considers that a simple review of the adopted Plan will be insufficient to meet the Borough's development needs.		

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	the adopted Plan will be insufficient to meet the Borough's development needs. Accordingly, Taylor Wimpey strongly recommends that the Council progresses a new Local Plan, supported by an updated evidence base that reflects the Borough's current housing requirement and economic growth objectives. This should include reassessment of strategic priorities and development management policies, rather than relying on outdated evidence—some of which dates back to 2008. A review alone would not adequately respond to the increased housing need or evolving national planning policy context. Taylor Wimpey therefore	Accordingly, Taylor Wimpey strongly recommends that the Council progresses a new Local Plan, supported by an updated evidence base that reflects the Borough's current housing requirement and economic growth objectives. This should include reassessment of strategic priorities and development management policies, rather than relying on outdated evidence—some of which dates back to 2008. A review alone would not adequately respond to the increased housing need or evolving national planning policy context. Taylor Wimpey therefore encourages the Council to prepare a new Local Plan covering a minimum 15-year period from adoption, in accordance with NPPF Paragraph 22. While the Council proposes a plan period to		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	encourages the Council to prepare a new Local Plan covering a minimum 15-year period from adoption, in accordance with NPPF Paragraph 22. While the Council proposes a plan period to 2042, the Local Development Scheme (January 2025) indicates adoption is anticipated in October 2027. To ensure compliance and provide a sufficient buffer, the plan period should extend to at least 2043, with a buffer beyond this considered prudent. This would also safeguard against potential delays, noting that the Council is currently approximately one month behind the LDS timeline.	2042, the Local Development Scheme (January 2025) indicates adoption is anticipated in October 2027. To ensure compliance and provide a sufficient buffer, the plan period should extend to at least 2043, with a buffer beyond this considered prudent. This would also safeguard against potential delays, noting that the Council is currently approximately one month behind the LDS timeline.		
National Highways	Q1. WSP recommend that the production of a new LP is supported, whether this is through an entirely new plan or through an amendment to the LP	Q2. A reviewed LP, with additional allocations, extending to 2042 would allow for continuity in policy development while ensuring that emerging growth pressures and	n/a	Comments noted

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
		infrastructure needs are appropriately addressed. Given the relatively limited extent of the SRN within the borough (primarily M55 Junctions 3 and 4), it is important that any new allocations or policy changes are assessed for potential impacts on the SRN. A full review, rather than a completely new plan, would enable targeted updates while retaining relevant existing policies that continue to support sustainable development and transport planning.		
Pegasus Group for Rowland Homes	Put simply, yes, the Council should prepare a new Local Plan, given the changes to national planning policy.	The updated National Planning Policy Framework (December 2024), together with updated Planning Practice Guidance, fundamentally altered the way in which the calculation of housing need is undertaken. As such, the adopted Local Plan does not follow the method for calculating housing need	n/a	Comments noted Whilst the NPPF refers to looking ahead 15 years, housing and economic needs are expected to change in a far shorter period. 13 years is realistic given the rapid pace of change and the requirement for local planning authorities (LPA) to review local

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
		currently in place, and provides for a level of housing need significantly below the new calculation. 2.3. The Framework makes clear in paragraph 232 that, for five years from the date of adoption, existing local plans remain up-to-date and the basis for decision making, providing that housing supply and delivery are appropriately maintained. The policies of the adopted Fylde Local Plan to 2032 (incorporating Partial Review) therefore remain the principal basis for decision-taking up to 6 December 2026. 2.4. After 6 December 2026, Fylde Council will require a new Plan if it is to retain effective control of development. In the absence of a new Plan (unless other criteria in the NPPF trigger this), the presumption in favour of sustainable development in the Framework will apply when		plans containing strategic policies every five years. The borough will meet its identified objectively assessed housing needs in full through the sufficient provision of housing allocations. The site allocations comprise a diverse portfolio of sites that will provide flexibility and choice.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
		assessing proposals for new development on sites not identified in the Local Plan. 2.5. The updated Local Plan should also plan for a minimum period of 15 years, in order to comply with paragraph 22 of the NPPF. This needs to be remembered that it is from the point of adoption, so the progress of the Plan needs to be monitored to ensure that it can comply with this requirement. 2.6. Furthermore, where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for their delivery. 2.7. In relation to whether the Plan should be a review or a new local		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
		plan from scratch, this is for the Council to determine. The Plan needs to be capable of complying with Section 3 of the NPPF, whichever route it decides to take.		
PWA Planning for Dixon Grange The Villa	2.1. Yes, Dixon Grange strongly supports the preparation of a new Local Plan. It is an absolute necessity to provide a clear and positive framework for growth and to address the borough's development needs. A new plan is essential for the following reasons: 1) Statutory Timelines and the Risk of Outdated Policies: The National Planning Policy Framework (NPPF) requires plans to be reviewed at least every five years. The current plan's policies are at risk of being considered out-of-date after December 2026, creating a policy vacuum that	2.2. Dixon Grange advocates for a comprehensive review and update of the existing Local Plan, extending the plan period to 2042. This approach offers a pragmatic path forward, but it must be understood that this cannot be another limited or 'partial' review. The scale of the challenge requires a full and robust re-examination of the Plan's entire strategic foundation. 2.3. To be found sound, the new plan must demonstrate that it has "examined fully all other reasonable options for meeting its identified need for development," as required by the NPPF. This must include a thorough re-assessment of local	n/a	Comments noted The borough will meet its identified objectively assessed housing needs in full through the sufficient provision of housing allocations. The site allocations comprise a diverse portfolio of sites that will provide flexibility and choice. Settlement boundaries will be reviewed to accommodate development requirement as necessary. Whilst the NPPF refers to looking ahead 15 years, housing and economic needs are expected to change in a far shorter period. 13 years is realistic given the rapid

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	would hinder the delivery of well-planned, sustainable developments. 2) Fundamental Changes in National Policy: The current Local Plan's strategy was devised under a previous version of the NPPF. The planning landscape has changed significantly, with the December 2024 NPPF placing an even greater emphasis on significantly boosting the supply of homes and making effective use of land. A new plan is essential to ensure Fylde's strategy is fully compliant and can respond positively to sustainable development. 3) A Significant Increase in Housing Need: The government's standard methodology points to a significant increase in the level of housing Fylde is expected to	designations and constraints, including existing settlement boundaries. A comprehensive strategic review is therefore essential to: • Properly assess the merits of sustainable edge-of-settlement locations such as The Villa, which are immediately adjacent to a Tier 1 settlement and its services. • Allow for a balanced comparison between highly sustainable sites that may be subject to local constraints and potentially less sustainable, more remote sites elsewhere. • Ensure the Council can allocate the best and most deliverable sites to meet its housing and development needs. 2.4. Therefore, our support for a 'review' is conditional on it being a comprehensive strategic review with a clear mandate to re-evaluate all land supply options and local policy		pace of change and the requirement for local planning authorities (LPA) to review local plans containing strategic policies every five years.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	deliver. The existing plan is not structured to meet this higher level of growth. A new Local Plan is therefore the only appropriate mechanism to plan positively for this need (as required by paragraph 62 of the NPPF), which in turn requires the Council to consider all suitable and deliverable sites, and to consider existing settlement boundaries are correctly drawn with how settlements actually function.	constraints, to ensure the borough's full development needs are met in the most sustainable way possible, this should include re-visiting existing settlement boundaries.		
PWA Planning for Medicom	2.1. Yes, we strongly support the preparation of a new Local Plan. It is an absolute necessity to provide a clear and positive framework for growth and to address the borough's significant housing needs. A new plan is essential for the following reasons: 1) Statutory Timelines and the Risk of Outdated Policies: The National	We advocate for a comprehensive review and update of the existing Local Plan, extending the plan period to 2042. This approach offers a pragmatic and efficient path forward, allowing for continuity where policies remain effective while focusing attention on the critical areas that demand fundamental change. 2.3. However, it must be unequivocally	n/a	Comments noted The borough will meet its identified objectively assessed housing needs in full through the sufficient provision of housing allocations in line with the development strategy taken forward. The site allocations comprise a diverse portfolio of sites that will provide flexibility and choice. Reasonable alternatives are

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	Planning Policy Framework (NPPF) requires plans to be reviewed at least every five years. The current plan's housing policies are at risk of being considered out-of-date after December 2026, creating a policy vacuum that would hinder the delivery of well-planned, sustainable developments. 2) Fundamental Changes in National Policy: The current Local Plan's strategy was devised under a previous version of the NPPF. The planning landscape has changed significantly, with the December 2024 NPPF placing an even greater emphasis on significantly boosting the supply of homes and making effective use of land. A new plan is essential to ensure Fylde's strategy is fully compliant with the current	understood that this cannot be another limited or 'partial' review. The scale of the challenge requires a full and robust re-examination of the Plan's entire strategic foundation. 2.4. The existing spatial strategy, devised to meet a much lower housing requirement under an outdated national policy framework, is no longer fit for purpose. The significant uplift in the borough's objectively assessed housing need renders the current spatial strategy unsound as a basis for planning to 2042. To be found 'Positively Prepared' and 'Justified' at examination, the new Plan must demonstrate that it has "examined fully all other reasonable options for meeting its identified need for development". 2.5. Crucially, this must include undertaking a strategic review of the		being considered through the Integrated Assessment. The Local Plan can meet its development needs in full and a Green Belt review is not necessary.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	national policy context. 3) A Significant Increase in Housing Need: The housing requirement in the adopted Local Plan is based on a now-superseded methodology. The government's current standard methodology, outlined in national guidance, points to a significant and material step-change in the level of housing the borough is expected to deliver. The existing plan is simply not structured to deliver this higher level of growth. A new Local Plan is the only proper mechanism to positively plan for this objectively assessed need, as required by paragraph 62 of the NPPF.	Green Belt. A simple update that shies away from a comprehensive review of major strategic constraints would be fundamentally at odds with national policy and would fail at examination. This review is the essential mechanism to identify sustainable, previously developed 'Grey Belt' sites, such as School Farm, which are a key component of the government's strategy for meeting housing needs. 2.6. Therefore, our support for a 'review' is conditional on it being a comprehensive strategic review with a clear mandate to re-evaluate all options, including the Green Belt, to ensure the borough's full development needs to 2042 are positively and sustainably planned for.		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
PWA Planning for Pringle Homes	2.1. Yes, Pringle Homes strongly supports the preparation of a new Local Plan. It is an absolute necessity to provide a clear and positive framework for growth and to address the borough's significant housing needs. A new plan is essential for the following reasons: 1) Statutory Timelines and the Risk of Outdated Policies: The National Planning Policy Framework (NPPF) requires plans to be reviewed at least every five years. The current plan's housing policies are at risk of being considered out-of-date after December 2026, creating a policy vacuum that would hinder the delivery of well-planned, sustainable developments. 2) Fundamental Changes in National Policy: The current Local Plan's strategy was	2.2. Pringle Homes advocates for a comprehensive review and update of the existing Local Plan, extending the plan period to 2042. This approach offers a pragmatic path forward, but it must be understood that this cannot be another limited or 'partial' review. The scale of the challenge requires a full and robust re-examination of the Plan's entire strategic foundation. 2.3. The existing spatial strategy is no longer fit for purpose to meet the new, higher housing requirement. A simple update that rolls forward this strategy would likely retain outdated and overly restrictive policies, such as the current Area of Separation designation, which act as a barrier to bringing forward well-located and highly sustainable sites like Greenlands Farm.	n/a	Comments noted Sites submitted to the Council have been considered in the SHELAA. The borough will meet its identified objectively assessed housing needs in full through the sufficient provision of housing allocations. The site allocations comprise a diverse portfolio of sites that will provide flexibility and choice.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	devised under a previous version of the NPPF. The planning landscape has changed significantly, with the December 2024 NPPF placing an even greater emphasis on significantly boosting the supply of homes and making effective use of land. A new plan is essential to ensure Fylde's strategy is fully compliant and can respond positively to sustainable development opportunities like Greenlands Farm. 3) A Significant Increase in Housing Need: The government's standard methodology points to a significant increase in the level of housing Fylde is expected to deliver. The existing plan is not structured to meet this higher level of growth. A new Local Plan is therefore the only appropriate mechanism to plan positively for	2.4. To be found sound, the new plan must demonstrate that it has "examined fully all other reasonable options for meeting its identified need for development," as required by the NPPF. This must include a thorough re-assessment of local designations and constraints. A comprehensive strategic review is therefore essential to: • Properly assess the merits of sustainable edge-of-settlement locations like Greenlands Farm, which are immediately adjacent to a Tier 1 settlement and its services. • Allow for a balanced comparison between highly sustainable sites that may be subject to local constraints (like the Area of Separation) and potentially less sustainable, more remote sites elsewhere. • Ensure the Council can allocate the best and most deliverable sites to meet its housing needs.		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	this need (as required by paragraph 62 of the NPPF), which in turn requires the Council to consider all suitable and deliverable sites, such as Greenlands Farm.	2.5. Therefore, our support for a 'review' is conditional on it being a comprehensive strategic review with a clear mandate to re-evaluate all land supply options and local policy constraints, including the Area of Separation, to ensure the borough's full development needs are met in the most sustainable way possible.		
PWA Planning for Ribby Hall	2.1. Yes, Ribby Hall Village strongly supports the preparation of a new Local Plan. It is an absolute necessity to provide a clear and positive framework for growth and to address the borough's significant development needs.	2.2. Ribby Hall Village advocates for a comprehensive review and update of the existing Local Plan, extending the plan period to 2042. This approach offers a pragmatic path forward, but it must be understood that this cannot be another limited or 'partial' review. The scale of the challenge requires a full and robust re-examination of the Plan's entire strategic foundation. 2.3. To be found sound, the new plan must demonstrate that it has "examined fully all other reasonable	n/a	Comments noted

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
		options for meeting its identified need for development," as required by the NPPF. This must include a thorough re-assessment of local designations and constraints, including the Area of Separation.		
PWA Planning	2.1. Yes, we strongly support the preparation of a new Local Plan. It is not merely desirable but an absolute necessity for the following reasons: 1) Statutory Timelines and the Risk of Outdated Policies: The NPPF requires plans to be reviewed at least every five years. The current plan was adopted in December 2021, meaning its key strategic housing policies are at risk of being considered out-of-date after December 2026. Commencing the process now is imperative to avoid	2.2. We advocate for a comprehensive review and update of the existing Local Plan, extending the plan period to 2042. This approach offers a pragmatic and efficient path forward, allowing for continuity where policies remain effective while focusing attention on the critical areas that demand fundamental change. 2.3. However, it must be unequivocally understood that this cannot be another limited or 'partial' review. The scale of the challenge requires a full and robust re-	n/a	Comments noted The borough will meet its identified objectively assessed housing needs in full through the sufficient provision of housing allocations. The site allocations comprise a diverse portfolio of sites that will provide flexibility and choice. The Local Plan can meet its development needs in full and a Green Belt review is not necessary.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	a policy vacuum that would leave the borough vulnerable to speculative, plan-unled development. 2) Fundamental Changes in National Policy: The current Local Plan's core strategy was originally prepared and examined against the 2012 NPPF. The planning landscape has changed fundamentally since then, culminating in the December 2024 NPPF, which places even greater emphasis on meeting housing need in full and making effective use of land. A new plan is essential to ensure Fylde's strategy is fully compliant with the current national policy context. 3) A Significant Increase in Housing Need: The housing requirement in the adopted Local Plan is based on a now-superseded methodology.	examination of the Plan's entire strategic foundation. 2.4. The existing spatial strategy, which directs the majority of development to four strategic locations, was devised to meet a much lower housing requirement under an outdated national policy framework. It is no longer fit for purpose. The significant uplift in the borough's objectively assessed housing need renders the current spatial strategy unsound as a basis for planning to 2042. 2.5. To be found 'Positively Prepared' at examination, the new Plan must, as a minimum, seek to meet the area's objectively assessed needs in full. To be 'Justified', the Council must demonstrate that it has "examined fully all other reasonable options for meeting its identified need for development".		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	The government's current standard methodology, outlined in national guidance, points to a significant and material step-change in the level of housing the borough is expected to deliver. The existing plan is simply not structured to deliver this higher level of growth. A new Local Plan is the only proper mechanism to positively plan for this objectively assessed need, as required by paragraph 62 of the NPPF.	This includes optimising density and, crucially, undertaking a strategic review of Green Belt boundaries where needs cannot be met on non-Green Belt land. 2.6. A simple update that rolls forward the existing strategy and shies away from a comprehensive review of major strategic constraints would be fundamentally at odds with national policy. Such an approach would fail at examination, wasting public resources and leaving the borough without a sound plan. Therefore, our support for a 'review' is conditional on it being a comprehensive strategic review with a clear mandate to re-evaluate all options, including the Green Belt, to ensure the borough's full development needs to 2042 are positively and sustainably planned for.		

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
S&L for J Edwards, J Marquis and A Marquis-Carr.	Yes - the Council should produce a new/amended Local Plan. The adopted Fylde Local Plan to 2032 (incorporating Partial Review) was adopted in December 2021, and examined under the 2019 NPPF and corresponding standard method for calculating local housing need. The adopted Local Plan will be five years old in December 2026 and its strategic policies are already failing to deliver a sufficient number of new homes as the Council cannot demonstrate a five year housing land supply. The adopted Local Plan is therefore out of date and the Government expects all local authorities without an up to date local plan, and which do not benefit from the transitional arrangements set out in the NPPF, to adopt one as quickly as	The Council should produce a new plan in the form of a Local Plan Review with additional land allocations to meet development needs up to 2042 and an appropriately updated and/or additional evidence base. This is the better option at the present time as it should be quicker to prepare and submit for examination than a completely new local plan and evidence base. While the Council is to be commended for setting an ambitious timetable to meet the Government deadline of December 2026 to submit a plan for examination which is produced under current plan-making legislation in the Planning and Compulsory Purchase Act 2004, it should be acknowledged that the timetable could easily slip and, if it does, the new Local Plan will have to account for the period of under-delivery and required catch-up	n/a	Comments noted

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	possible in accordance with the current NPPF and current, revised and mandated, standard method for calculating local housing need.	which will be caused by the delay and need to re-start work as a 'new style' plan produced under the Levelling Up and Regeneration Act 2023 legislation.		
S&L for Oakmere Homes	Yes - the Council should produce a new/amended Local Plan. The adopted Fylde Local Plan to 2032 (incorporating Partial Review) was adopted in December 2021, and examined under the 2019 NPPF and corresponding standard method for calculating local housing need. The adopted Local Plan will be five years old in December 2026 and its strategic policies are already failing to deliver a sufficient number of new homes as the Council cannot demonstrate a five year housing land supply. The adopted Local Plan is therefore out of date and the Government expects all local	The Council should produce a new plan in the form of a Local Plan Review with additional land allocations to meet development needs up to 2042 and an appropriately updated and/or additional evidence base. This is the better option at the present time as it should be quicker to prepare and submit for examination than a completely new local plan and evidence base. While the Council is to be commended for setting an ambitious timetable to meet the Government deadline of December 2026 to submit a plan for examination which	n/a	Comments noted The Local Plan will be supported by proportionate evidence base.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	authorities without an up to date local plan, and which do not benefit from the transitional arrangements set out in the NPPF, to adopt one as quickly as possible in accordance with the current NPPF and current, revised and mandated, standard method for calculating local housing need.	is produced under current plan-making legislation in the Planning and Compulsory Purchase Act 2004, it should be acknowledged that the timetable could easily slip and, if it does, the new Local Plan will have to account for the period of under-delivery and required catch-up which will be caused by the delay and need to re-start work as a 'new style' plan produced under the Levelling Up and Regeneration Act 2023 legislation		
S&L for River Properties	Yes - the Council should produce a new/amended Local Plan. The adopted Fylde Local Plan to 2032 (incorporating Partial Review) was adopted in December 2021, and examined under the 2019 NPPF and corresponding standard method for calculating local housing need. The adopted Local Plan will be five years old in December 2026 and its strategic	The Council should produce a new plan in the form of a Local Plan Review with additional land allocations to meet development needs up to 2042 and an appropriately updated and/or additional evidence base. This is the better option at the present time as it should be quicker to prepare and submit for examination than a completely new local plan and	n/a	Comments noted The Local Plan will be supported by proportionate evidence base.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	policies are already failing to deliver a sufficient number of new homes as the Council cannot demonstrate a five year housing land supply. The adopted Local Plan is therefore out of date and the Government expects all local authorities without an up to date local plan, and which do not benefit from the transitional arrangements set out in the NPPF, to adopt one as quickly as possible in accordance with the current NPPF and current, revised and mandated, standard method for calculating local housing need.	evidence base. While the Council is to be commended for setting an ambitious timetable to meet the Government deadline of December 2026 to submit a plan for examination which is produced under current plan-making legislation in the Planning and Compulsory Purchase Act 2004, it should be acknowledged that the timetable could easily slip and, if it does, the new Local Plan will have to account for the period of under-delivery and required catch-up which will be caused by the delay and need to re-start work as a 'new style' plan produced under the Levelling Up and Regeneration Act 2023 legislation		
Steven Abbott Associates for Bradkirk Business Park	Yes	• A reviewed Local Plan with additional allocations to extend to 2042? No • A completely new Local Plan with	n/a	Comments noted

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
		entirely new policies decided from scratch? Yes, but it should maintain the spatial strategy based on the existing towns and environs being the focus for new development including Kirkham-Wesham		
Turley for Strategic Land Group	1.6 SLG welcomes the production of a new Local Plan for Fylde which will guide and support development across the borough over the next 15 years. 1.7 The IVSD is published at an important time. Since its election in July 2024, the Government has been clear in its view that “sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people” 1. It has stated that its “central mission” is to “restore economic	n/a	n/a	Comments noted

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	growth” and it also aims to deliver the infrastructure that the country needs, “including one and a half million homes over the next five years” 2. The Government has identified that the planning system is the key to unlock this growth. 1.8 The NPPF also significantly increases the minimum needs for new housing to support the Government’s objective of delivering 1.5 million more homes by 2029. Needs at national and local level have increased significantly. The minimum need in Fylde is now 419 new homes per annum; a significant uplift (a 37% increase) compared to the existing Local Plan housing requirement of 305 new homes per annum. 1.9 The repercussions of new national planning policy are such			

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
	that the existing Fylde Local Plan will no longer be considered as being up-to-date from December 2026. 1.10 The economic context and new national planning policy has significantly changed since the previous Local Plan was reviewed. SLG therefore fully support the Council's decision to proceed and prepare a new Local Plan for Fylde.			
United Utilities	n/a	As an infrastructure provider, U UW suggests that it would be preferable for the local planning authority to consider a new local plan with a longer time frame. This helps add certainty to our infrastructure planning forecasting. We also recommend that this option would be the best approach to adapting new policies to respond to the climate change challenge.	n/a	Comments noted IFR1 Service Accessibility and Infrastructure sets out how development proposals should deliver local infrastructure. Please refer to the policy for further information.

Respondent name	(1) Do you agree that the Council should produce a new/amended Local Plan?	(2) Do you think that the Council should produce: • A reviewed Local Plan with additional allocations to extend to 2042? • A completely new Local Plan with entirely new policies decided from scratch? • Other (please state)?	(Other please state)	Council Response
		Sites in Multiple Ownership UW has concerns regarding any site allocations which are in multiple land ownerships. The experience of UW is that where sites are in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. We therefore encourage you to make early contact with all landowners/site promoters and challenge those landowners on how they intend to work together, preferably as part of a legally binding delivery framework and/or masterplan. You should give early consideration to the extent to which land ownership is fragmented on sites and whether this will be likely to compromise a co-ordinated approach to the delivery of sustainable		

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		development. We believe that raising this point at this early stage is in the best interest of achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner. We recommend that future policy requires applicants to provide drainage strategies for foul and surface water. For larger sites, we recommend that policy requires applicants to prepare an infrastructure phasing and delivery strategy. For strategic sites, we recommend that early consideration is given to the infrastructure strategy as part of the preparation of the local plan and to ensure a co-ordinated approach to the delivery of new development and infrastructure. We would recommend the following policy is considered for inclusion in any future local plan:		

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		Recommended Policy Where applications are submitted on land which is part of a wider allocation / development, applicants will be required to submit allocation/development wide infrastructure strategies to demonstrate how the site will be brought forward in a co-ordinated manner. Explanatory text The infrastructure strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over lengthy time periods and by numerous developers. The strategy must be updated to reflect any changing circumstances between phases		

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		during the delivery of the development.		

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Alban Cassidy	No			Comment noted.
Anna Briggs	Yes		I'm not sure where to insert these issues as the categories you have used are wide so I'll copy them here and there: -aesthetics: harmonizing store fronts would help keep a certain level of charm. For example in St Annes, some shops just look dire and others beautiful. Maybe unified coloured awnings, plants hanging etc could make a more harmonious effect like in Lytham. More regular scrubbing of the rain protection kiosks and benches would be good as they often get covered in guano. The blue metal structures in St Annes could do well all being painted dark green or brick colour or brown to harmonize with the Victorian brick colour.	Many of the comments made address issues outside of the remit of the Local Plan and the planning system as set out below. The Local Plan will include design policies and guidance for issues including aesthetics The wellbeing of young people is outside of the scope of the Local Plan. Ventures including markets is outside of the scope of the Local Plan. Beach pollution is covered under the Protected Environments and Assets Policies section The acceptable levels of sea water bacteria are regulated under the European Bathing Water Directive. The issue is outside of the scope of the Local Plan.

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			-young people bullying, anti-social behaviour, poor mental health: young people often seem hopeless, with issues such as misogynistic behaviour, bullying, depression, vaping addiction, teen pregnancy, body image issues, not wearing bike helmets, and little to do. It is an older population but there truly are too few non-school fun spaces for young people to enjoy in all of Fylde. More CCTV for example in Ashton Gardens and on the beach would help curb anti-social behaviour perhaps. -I would appreciate the monthly market to be weekly, to be able to buy most of my fresh food from local producers and not supermarkets. -pollution on the beaches is INSANE and should not be left to volunteers to take care of.	Recycling is provided for within the design and amenity policies section of the plan The care sector is outside of the scope of the Local Plan Promotion of community facilities is outside of the scope of the Local Plan Accessibility is provided for in the transport section of the Local Plan Hate speech etc. is outside of the scope of the Local Plan The Local Plan provides for affordable housing units however the general issue of housing affordability is outside of the scope of the Local Plan Provision of cultural events and art is outside of the scope of the Local Plan

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			Many jobs could be created to fine and surveil and clean the beaches, as well as educating tourists about pollution. -water quality: I have lived here for a few years and the water has never been sufficient free from sewage to swim in. This is a major drawback to the local community's wellbeing and to tourism. -recycling should be enforced like in Germany. In all the workplaces I've had, no staff member recycled anything and management didn't care. -many roles locally are in elder care, this is my sector. This is a sector with a huge amount of managerial bullying and exploitation, pressure to not be unionized, ridiculously low pay and pressure to do non-contractual work. The CQC, NHS, unions, council and elder	

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			care organizations should be very concerned that our most vulnerable are cared for by understaffed, undertrained, exhausted, under-supported and underpaid people. -lack of knowledge about services: many people here are unaware about what cultural organizations, clubs, churches, libraries, the CAB, volunteering sector, the council etc. has to offer. The social media and newsletters from official channels should highlight these opportunities better. Blackpool council does a very good job at this. -accessibility: too many spaces are inaccessible. As an area with an older and very highly disabled population (the same for our tourists who are often older and disabled), Fylde could be a global model for smart accessible options for all	

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			to enjoy the beach, trains, buses, cafes etc. Why should disabled people wait until 9.30am to use their free pass on the bus? Do we not have medical appointments, work, school drop off, shopping to do like anyone else? -hate speech: the local social media is flooded with misinformation, conspiracy and hate speech. It would help for council communication staff to be a part of all local groups and share factual information to avoid this. Again, the Blackpool MP team does a very good job at social media, communication etc. and could be a model here. -renting: there should be an easier way to rent an apartment and avoid having to pay a deposit when on a low salary or benefits. If not for my relative, I would never have qualified to rent and ended up	

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			homeless. Most people can't afford a deposit. -events and art: having an artist in residence programme, who would contribute temporary installations in the squares, cutting-edge events, Q&As with school kids, open air screenings, curated pop-ups etc. would attract a lot of different tourists here and be fun for younger people.	
Bryning with Warton Parish Council	No			Comment noted.
Claire Parker for Blackpool Council	Yes	Reference should be made to existing strategic employment sites including Blackpool Airport Enterprise Zone.		Comment noted. The Local Plan to 2042 identifies three strategic employment sites: BAE Systems Warton, Westinghouse Springfields and Blackpool Airport and Enterprise Zone. These three sites each have their own policy in the Local Plan to 2042 that designates the site and

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				outlines appropriate development.
David Chedd	No			Comment noted.
Emma Swindells	No			Comment noted.
Frank Andrews	No			Comment noted.
Frank Andrews	No			Comment noted.
Gerard Malone	No			Comment noted.
Hannah Dell'Armi	No	no but the local plan does not appear to have protected anything. Despite it outlining the protection of rural areas we are still plagued by planning applications for housing that does not meet the needs of the population of the prioritises in the local plan as it is currently.		The Local Plan includes policies that seek to conserve the character of rural areas. Fylde Council commissioned a Housing Needs Survey in 2022 to identify and understand affordable housing needs across the borough, with results now informing its Affordable Housing Supplementary Planning Document (AHSPD)
Haydn Payne (on behalf of the Caravan	No			Comment noted.

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and Motorhome Club)				
Irene Jacques			Housing developments should only be granted permission to build on brownfield sites.	The housing requirement is large and being constrained to brownfield sites is not realistically achievable as the brownfield land supply in Fylde is limited.
John Leadbeater	No	None at present	Warton may be a strategic location but the views of local residents should be taken into account when putting forward development plans. This was not done when the current Local Plan was being developed. There is an assumption here that Warton (a village !) has to accept anything that the planners and government choose to envisage.	Residents were consulted in the normal way and views are taken into account. However, to meet housing needs has required the allocation of significant areas of land across the borough, including Warton which hosts a manufacturing site of national importance. As the Spatial Portrait explains, allowing housing development close to this employment site aims to reduce counting levels and is therefore part of creating sustainable development. As the Spatial Portrait acknowledges, there is

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				a need to deliver local services to support planned development.
John Maskell	Yes	Warton and Freckleton feature in the spatial portrait, but Wrea Green, which is sinking under a mass of overdevelopment does not.	What is FBC's vision for Wrea Green	The Spatial Portrait details Wrea Green as a Tier 1 larger rural Settlement under policy SET1: Settlement Hierarchy, having a range of basic facilities but still being dependent on sustainable transport connections to the urban areas.
Keith Gorton	No			Comment noted.
Keith McKay	Yes	Para 2.23 - Blackpool Airport still has use as a Business Jet Centre, so is utilised by private passengers and therefore retains its Fully Licensed status Para 2.27 - We would draw special attention to the need for repair and skilled maintenance of the Pebble Pavements, for which Lytham is noted, particularly true of	See above	Comments noted. A policy in the Local Plan will allow for conservation of listed buildings and their settings and, enhancement where appropriate

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		the pavement in the main square which was damaged through ill-use by heavy vehicle access, including the market vehicles that access the area. Para 2.49 - The expansion of Warton to the East and North has demonstrated the issues associated with ageing drainage infrastructures and utilities on an essential flat area with little natural fall to assist the drainage, which requires attention before further development, as does provision of facilities, e.g. medical or schools. Para 2.51 - Freckleton is a village whose character requires some form of special attention, to maintain its status. What form of protection is unclear as a full conservation zone could place restriction too onerous in		A policy in the Local Plan will require drainage plan for each planning application. The regional statutory undertaker has responsibilities to maintain and improve land to aid improved drainage. A policy in the Local Plan will ensure that proposals for development shall conserve, protect and, where appropriate, enhance the character, appearance, significance and historic value of Fylde's designated and undesignated heritage assets which includes the distinctive

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		many cases. Currently, we tend to manage this via the local Planning Committee of the PC. There are, however, a number of unauthorised developments that have occurred, particularly on the Naze area and banks of the River Dow (which is part of the SSSI and Ramsar site) which have proved troublesome to deal with effectively. Para 2.56 - Regarding the Naze Lane Industrial Estate, the road access to this site has long been a problem, with the access being via the village centre or through the old village, then via an uncontrolled road which is National Speed Limit and no lighting or footpath, especially from Stoney Lane junction to the Estate itself. LCC Highways are on record from years back (2010) as recommending no further expansion.		historic core of Freckleton village The highways authority (external to Fylde Council) is obliged to assess highway safety.

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Linda Nulty	Yes	The "spatial portrait" is very Lytham St Annes based. This urban core is where barely half of the population live or even interact with. The very attractive village and village green of Wrea Green is not even mentioned. Kirkham and Wesham have taken far too much development in the last 15 years and are now used as dormitory towns due to the proximity of the M55 leading to other areas in Fylde, Blackpool, Chorley, Manchester and beyond for employment. New sites for building MUST be limited until the infrastructure has had time to catch up and maintain the Community feel of these Towns - they are dying.	Wrea Green importance as above. Wesham Marsh is an identified Biological Heritage site and of significant importance to bird watchers and nature lovers, but totally ignored by Fylde Borough Council. It is constantly under threat for housing because of this lack of recognition and is also obviously prone to flooding. First time buyer homes are essential and the reduction of 4/5 bedded homes must be considered if homes are to cater for the existing residents of the rural Fylde area and Kirkham and Wesham areas. LANDSCAPING conditions and car parking requirements need to be enforced. SO few trees in Fylde as a whole. Trees are removed and NEVER replaced.	The Spatial Portrait provides a summary of characteristics and related key issues across a number of settlements in Fylde. As the Spatial Portrait notes, St Annes and Lytham are the largest settlements in the borough but it is not agreed that these dominate the narrative. It is agreed that infrastructure is important and that it can be challenging to co-ordinate its delivery with development. This is an issue the new Local Plan will consider. A policy in the Local Plan will ensure that proposals for development shall conserve, protect and, where appropriate, enhance the character, appearance, significance and historic value of Fylde's designated and undesignated heritage assets which includes the distinctive village of Wrea Green (which is

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				mentioned in the Rural Areas section of the Spatial Portrait). The Local Plan will support proposals for daytime and evening business, leisure, cultural and heritage based tourism facilities, such as hotels, restaurants, cinemas, theatres, museums, swimming pools and leisure centres within town centres in Key Service Centres and in Local Service Centres Biological Heritage Sites are protected in the draft FLP42 Fylde Council commissioned a Housing Needs Survey in 2022 to identify and understand affordable housing needs across the borough, with results now informing its Affordable Housing Supplementary Planning Document (AHSPD)

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				TREE & WOODLAND STRATEGY FOR FYLDE BOROUGH seeks to improve tree coverage and ensure that felled trees are replaced.
Linda Nulty		PLEASE NOTE - As I could find no way of saving all my answers to continue my comments on this form it should be read in conjunction with my previously submitted form 24742938 (Linda Nulty) there will be large gaps as I do not wish to return to all questions.		Comment noted.
Lytham St Annes Civic Society	Yes	We have noted that the spatial portrait does not include the education facilities in Lytham St Annes. Lytham Green should be included as a designated, strategic open space with policies to follow thus protecting it from overuse. Consideration of the impact of events and festivals on the road and transport	Consider the clash between commercial and residential interests. Also, the movement towards hospitality and away from retail in the town centres should be considered as there needs to be a balance between the two.	The overall description of St Annes is extensive and covers the broad base of activity that occurs within the larger area of the borough accordingly. Detailed aspects of all activity in the borough cannot be covered. Lytham Green is proposed to be designated a Local Green Space.

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		infrastructure as well as the residential impact. Consider transport solution such as park and ride etc. Development of existing houses into much larger units is mentioned as an issue in rural areas but this can also be seen as an issue in Lytham St Annes.		The Local Plan will require developers to demonstrate how access to services will be achieved by means other than the car, and where appropriate, demonstrate how the range of local social and community services and facilities available will be suitable and accessible for the intended occupiers/users Although the Local Plan can protect strategic open spaces from development, it cannot protect them from perceived over-use. The impact on events involving Lytham Green is not a matter for the Local Plan. In the town centres, as defined on the Policies Map, offices, retail, and main town centre uses will be encouraged within the defined town centres. The council does not intend to include a policy that restricts replacement with substantially larger dwelling. The council

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				intends to include a design policy that will allow replacements that are out of character to be refused
Marcus Dowling	Yes			Comment noted.
Martin Alderman	Yes	Test	Test	Comment noted.
Mrs B Wildish	Yes		Given Tourism is of key importance, as is the development/maintenance of shopping centres, the sparsity and inconvenient provision of public (particularly accessible) toilets is a major concern.	Toilet provision is of interest to the council as it is appreciated that good provision has a positive impact on tourism etc. The council does not intend to seek developer contributions to improve toilet provision. The Council has prepared an Infrastructure Delivery Plan (IDP), which identifies infrastructure required by the Borough will be secured to support the development in the Local Plan and how it will be delivered. In doing this, it identifies issues of shortfall in existing infrastructure that present obstacles to the

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				delivery of the Local Plan and how these will be overcome.
P Stanford	Yes	Countryside Section ? Kirkham and Wesham ?	Amend Plan at least there is some chance it could be used to “protect” Fylde for a short time following the completely unnecessary and unpopular government reorganisations that is looming over us – as once we merge with others, we are doomed and living around here could be less attractive. K&W cannot support further allocations / developments. K&W bypass was historically the agreed boundary between urban and countryside – I know that cos I watched them build it from my bedroom window and my father worked for LCC at the time. FBC / the government then failed in allowing the Princess Meadows and Brookhouse (and Mill Farm !) developments. So you now	It is a requirement of national planning policy that local planning authorities plan to meet housing and other development needs. It is the intention of the Local Plan that this is done in a sustainable way that takes into account matters such as flood risk. Failure to do this will lead to a situation where development will come forward in an ad hoc way and without the necessary supporting infrastructure.

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			need to STOP further developments on the other side of the K&W bypass where countryside / fields exist. FBC / government have also allowed recent developments on fields around K&W that ARE KNOWN to flood. Planning committee are making decisions based on politics, planning blurb, policy and waffle, just to approve sites – not on KNOWN facts that local residents are aware of as they have seen the flooded fields over the years – feels like FBC planning are just IGNORING residents Reviewed plan –but with NO further allocations in Kirkham and Wesham. Once other allocations have been met / planned – please declare Fylde as full and not accepting further applications. It has to come a point where FBC simply	

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			can't accept more and YOU need to be making that clear to Government.	
Philip Bickerstaff	No			Comment noted.
Stephen and Jacqueline Croft	Yes	The 'isolated' villages and hamlets should not get joined to larger places such as Kirkham and Lytham and its important to retain their character. But some places like Moss Side, not mentioned in the Portrait, might be natural places to consider for additional housing if done sympathetically.	Whitehills and Whyndyke seems like a sensible development area but the burden of the developer having to provide community facilities should be removed. It seems hard to believe that local and central government authorities should not provide schools, for example, funded through long-term revenue.	Comments noted. Requiring developers to contribute towards infrastructure requirements is a normal part of planning practice. The Council will be publishing an Infrastructure Delivery Plan that sets out the infrastructure requirements that will be necessary to support the Local Plan. This will be taken into account as part of the assessment of the viability of allocations.
Steven Abbott	Yes	The success of farms in delivering employment opportunities e.g. Bradkirk Business Park (reference 4.1.3 - Fylde Council - Business and Industrial Land Schedule March 2023.Paragraph 2.39 and the fourth stated issue	How the needs of micro businesses and SMEs could be met spatially across the district with a focus on the strategic locations, Kirkham-Wesham in particular.	Comments noted. The aim of the Spatial Portrait is to establish the characteristics of the area and to use this to identify key issues. In this context, the wording at 2.39 is appropriate.

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		could be misleading and needs reviewing. Delete the words 'are limited' from paragraph 2.39. This is not appropriate in a Portrait but an unduly negative observation about one aspect. The growth needed in Kirkham-Wesham as one of the strategic locations should be seen as an opportunity not a problem. One aspect of that is for higher frequency local bus services. Similarly, the final bullet point should not talk about 'maintaining sufficient bus services' but promoting bus services in parallel with new residential and expanded employment areas.		The Spatial Portrait recognises that an aim for the Local Plan is to maintain sufficient bus services in support of development sites away from the town centre. Promoting bus services is not a matter for the Local Plan. Policy ECD6: <i>Employment Opportunities and Commercial / Employment Premises</i> provides for the requirements of local businesses and small firms

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Asteer Planning for Applethwaite	3.6 The Spatial Portrait for Fylde identifies Newton-with-Scales as one of seven villages that are identified as being sufficiently sustainable to support a level of growth necessary to maintain the existing facilities. 3.7 However, the current adopted Local Plan splits the rural areas into Tier 1: Larger Rural Settlements including Newton-with-Scales, Staining and Wrea Green, and Tier 2: Smaller Rural Settlements of Clifton, Elswick, Singleton and Weeton. This identifies the larger rural settlements as providing small scale essential local services, as well as local opportunities for employment. They can therefore be regarded as sustainable communities, albeit with a dependency on, and sustainable transport connection to / from the Key	the current adopted Local Plan splits the rural areas into Tier 1: Larger Rural Settlements including Newton-with-Scales, Staining and Wrea Green, and Tier 2: Smaller Rural Settlements of Clifton, Elswick, Singleton and Weeton. This identifies the larger rural settlements as providing small scale essential local services, as well as local opportunities for employment. the distinction between the Tier 1 and Tier 2 rural settlements should be identified within the Spatial Portrait to ensure that preference and priority is given to delivering growth in Tier 1 Rural Settlements, reflecting their sustainability, capacity and existing infrastructure, when considered against Tier 2 Rural Settlements.		Comments noted, however the Spatial Portrait is not making policy but is a description of the key characteristics of the borough and individual settlements.

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	Service Centres and the Strategic Locations for Development, identified in Policy DLF1 for other services and facilities. 3.8 Applethwaite strongly consider that the distinction between the Tier 1 and Tier 2 rural settlements should be identified within the Spatial Portrait to ensure that preference and priority is given to delivering growth in Tier 1 Rural Settlements, reflecting their sustainability, capacity and existing infrastructure, when considered against Tier 2 Rural Settlements.			
Emery Planning for Persimmon & Charles Church	3.1 The consultation document does not engage with the Fylde Coast Strategic Housing Market and the needs and characteristics of neighbouring authorities in Blackpool and Wyre. We would suggest that the spatial portrait of these neighbouring authorities	3.1 The consultation document does not engage with the Fylde Coast Strategic Housing Market and the needs and characteristics of neighbouring authorities in Blackpool and Wyre. We would suggest that the spatial portrait of these neighbouring authorities	3.1 The consultation document does not engage with the Fylde Coast Strategic Housing Market and the needs and characteristics of neighbouring authorities in Blackpool and Wyre. We would suggest that the spatial portrait of these neighbouring authorities	The Local Plan acknowledges that there should be a variety of house types, tenure types and a range of prices suitable for a mix of households including single persons, young families with children and older people. Meeting housing needs is required for creating

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	should be fully explored and the constraints that exist in terms of delivering housing there e.g. developable supply of housing in Blackpool. 3.2 Paragraph 2.11 of the consultation document notes that the Borough has an ageing population and that population is sustained only through inward migration. However, the issue is not taken any further forward through the consultation document in terms of implications for the new local plan. Firstly, this issue highlights the importance of migration across authority areas and the need for Fylde to understand and address cross-boundary unmet housing needs. Secondly, it points to a need to build the right homes in the right places in order to attract and sustain a working age population and this goes beyond just quantitative needs	should be fully explored and the constraints that exist in terms of delivering housing there e.g. developable supply of housing in Blackpool. 3.2 Paragraph 2.11 of the consultation document notes that the Borough has an ageing population and that population is sustained only through inward migration. However, the issue is not taken any further forward through the consultation document in terms of implications for the new local plan. Firstly, this issue highlights the importance of migration across authority areas and the need for Fylde to understand and address cross-boundary unmet housing needs. Secondly, it points to a need to build the right homes in the right places in order to attract and sustain a working age population and this goes beyond just quantitative needs (e.g. family housing in	should be fully explored and the constraints that exist in terms of delivering housing there e.g. developable supply of housing in Blackpool. 3.2 Paragraph 2.11 of the consultation document notes that the Borough has an ageing population and that population is sustained only through inward migration. However, the issue is not taken any further forward through the consultation document in terms of implications for the new local plan. Firstly, this issue highlights the importance of migration across authority areas and the need for Fylde to understand and address cross-boundary unmet housing needs. Secondly, it points to a need to build the right homes in the right places in order to attract and sustain a working age	and maintaining sustainable communities. The Council will continue to engage with Wyre and Blackpool as the other Fylde Coast authorities on matters of mutual interest. The Local Plan will be based on an understanding of housing needs as set out in section 4 of the Spatial Portrait. The Local Plan housing policies encourage a mix of working age and beyond working age. Comments relating to the need for family housing are noted.

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	(e.g. family housing in aspirational areas). Thirdly, this demographic trend, which is much more pronounced than for England as a whole, has the potential to undermine the vitality and viability of rural communities and the economic vision and objectives of the Borough. 3.3 We consider that the emerging local plan should identify attracting and sustaining a working age population through building the right homes in the right places as a key objective and issue to be addressed.	aspirational areas). Thirdly, this demographic trend, which is much more pronounced than for England as a whole, has the potential to undermine the vitality and viability of rural communities and the economic vision and objectives of the Borough. 3.3 We consider that the emerging local plan should identify attracting and sustaining a working age population through building the right homes in the right places as a key objective and issue to be addressed.	population and this goes beyond just quantitative needs (e.g. family housing in aspirational areas). Thirdly, this demographic trend, which is much more pronounced than for England as a whole, has the potential to undermine the vitality and viability of rural communities and the economic vision and objectives of the Borough. 3.3 We consider that the emerging local plan should identify attracting and sustaining a working age population through building the right homes in the right places as a key objective and issue to be addressed.	
Historic England	Historic England welcomes the content of the spatial portrait which gives a good description of the Borough, its historic	When referring to heritage assets, historic environment, local character and identity. It should not only be about 'protecting' these assets but about 'enhancement' of them	No comment.	Comments noted and the matter of enhancement and setting will be considered as part of Local Plan policy

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	environment and areas of local character and identity.	as well. Reference to setting should be included. 22		development on the historic environment.
Home Builders Federation			Spatial Portrait of Fylde, Key Issues and Vision Spatial Portrait of Fylde in 2025 8. The Spatial Portrait correctly identifies a key demographic pressure for Fylde which is an aging population. Whilst the implications of this identified by the Council include important factors such as housing affordability, an ageing population is also an indication of a shrinking working age population. Maintaining a working age population for the Borough is vital if settlements are to remain viable and sustainable in the future. Therefore, alongside looking to boost housing for older people, the Borough should also be taking active steps to boost the supply of homes more generally, to ensure housing	It is important that the housing mix provided on new development sites meets needs, including family housing and housing for young people. When considering mix, these are not only the needs of those not in accommodation, but those seeking accommodation of a different size or type, sometimes in a different area. Therefore, it is necessary to consider trends broadly and relate this to the supply in the particular areas where development is being brought forward. The requirement for a mix of dwellings of different sizes is based not only on the pattern of need, in particular the increase in the population of 65 and over and the resulting need for smaller units of accommodation, but also the principle of delivering mixed, sustainable communities. The requirement to ensure that a mix of smaller homes is provided is

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			needs for the entire borough are met and that the demographic issue of an aging population can be tackled.	particularly acute in rural settlements, where there is a limited supply of smaller units. Therefore, the Local Plan will provide a specific requirement for smaller homes in rural settlements The Plan shall recognise the benefits of populations of mixed stages of life in achieving sustainable places.
Lancashire County Council	One of the core planning principles that underpins both plan-making and decision making is the development of places that "enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities,			The Local Plan encourages healthy living through policy IFR5: Enhancing Sustainable Transport Choice. This states that developments will be required improve community health and wellbeing by encouraging take up of alternative means of transport such as walking and cycling. Developers will be required to provide footpaths and design site layouts to reduce walking distances and contribute to the improvement of public transport between the location of the site and nearby town centres, hospitals, railway stations and employment centres where the existing provision is sub standard

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	local shops, access to healthier food, allotments and layouts that encourage walking and cycling". Within Fylde, 4 of the 51 Lower layer Super Output Areas are in the top 20% most deprived areas (as measured by the Index of Multiple Deprivation 2019) in Lancashire. The new Fylde Local Plan to 2042 has the opportunity to make a positive contribution to communities within these areas through healthy place making. Public Health would recommend reference is made to this within the Spatial Portrait.			or requires further support to continue. Additionally, policy ENT5 details that the loss of community, health, leisure and cultural facilities will be resisted unless it can be demonstrated that the facility is no longer needed.
Lichfields for Taylor Wimpey	Spatial Portrait Taylor Wimpey agrees with the Council's Spatial Portrait and its recognition of above-average national population growth and the need to	Spatial Portrait Taylor Wimpey agrees with the Council's Spatial Portrait and its recognition of above-average national population growth and the need to	Spatial Portrait Taylor Wimpey agrees with the Council's Spatial Portrait and its recognition of above-average national population growth and the need to respond to an	It is important that the housing mix provided on new development sites meets needs, including family housing and housing for young people. When considering mix, these are not only needs of those not in accommodation, but those seeking accommodation of a

Respondent name	(3) Is there anything missing from the Spatial Portrait that should be added?	(4) Do you have any suggested amendments to the Spatial Portrait? Please provide details.	(5) Are there other important issues that have not been identified? Please provide details.	Council Response
	respond to an ageing population. Due consideration should also be made with respect to its ageing population and the relationship with the local economy. Taylor Wimpey encourages the Council to place emphasis on delivering new homes, particularly family housing, that attracts working-age households with children to assist in balancing the Borough's demographic profile and supporting the creation of sustainable communities. Taylor Wimpey agrees that maintaining a consistent supply of high-quality new housing is essential—not only to meet the needs of older residents, but also to unlock existing housing stock within the Borough for the wider population. The circular nature of the housing market should not be understated in	respond to an ageing population. Due consideration should also be made with respect to its ageing population and the relationship with the local economy. Taylor Wimpey encourages the Council to place emphasis on delivering new homes, particularly family housing, that attracts working-age households with children to assist in balancing the Borough's demographic profile and supporting the creation of sustainable communities. Taylor Wimpey agrees that maintaining a consistent supply of high-quality new housing is essential—not only to meet the needs of older residents, but also to unlock existing housing stock within the Borough for the wider population. The circular nature of the housing market should not be understated in	ageing population. Due consideration should also be made with respect to its ageing population and the relationship with the local economy. Taylor Wimpey encourages the Council to place emphasis on delivering new homes, particularly family housing, that attracts working-age households with children to assist in balancing the Borough's demographic profile and supporting the creation of sustainable communities. Taylor Wimpey agrees that maintaining a consistent supply of high-quality new housing is essential—not only to meet the needs of older residents, but also to unlock existing housing stock within the Borough for the wider population. The circular nature of the housing market should not be understated in supporting housing choice and availability.	different size or type, sometimes in a different area. Therefore, it is necessary to consider trends broadly and relate this to the supply in the particular areas where development is being brought forward. The requirement for a mix of dwellings of different sizes is based not only on the pattern of need, in particular the increase in the population of 65 and over and the resulting need for smaller units of accommodation, but also the principle of delivering mixed, sustainable communities. The requirement to ensure that a mix of smaller homes is provided is particularly acute in rural settlements, where there is a limited supply of smaller units. Therefore, the Local Plan will provide a specific requirement for smaller homes in rural settlements The Local Plan shall recognise the benefits of populations of mixed stages of life in achieving sustainable places.

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	supporting housing choice and availability. For example, when older residents downsize to accessible homes, larger family properties are released back into the market. Similarly, when families upsize, smaller terraced homes may become available to first-time buyers. Overall, Taylor Wimpey supports the Council's recognition of meeting the needs of an ageing population but this should be couched in the context of an overall promotion of housing delivery. Taylor Wimpey also welcomes the inclusion of housing affordability as a key issue to be addressed in the Local Plan and it is anticipated that the Council will continue to apply an affordable housing policy requirement. Residential allocations are a vital means for ensuring the consistent delivery of high-quality	supporting housing choice and availability. For example, when older residents downsize to accessible homes, larger family properties are released back into the market. Similarly, when families upsize, smaller terraced homes may become available to first-time buyers. Overall, Taylor Wimpey supports the Council's recognition of meeting the needs of an ageing population but this should be couched in the context of an overall promotion of housing delivery. Taylor Wimpey also welcomes the inclusion of housing affordability as a key issue to be addressed in the Local Plan and it is anticipated that the Council will continue to apply an affordable housing policy requirement. Residential allocations are a vital means for ensuring the consistent delivery of high-quality	For example, when older residents downsize to accessible homes, larger family properties are released back into the market. Similarly, when families upsize, smaller terraced homes may become available to first-time buyers. Overall, Taylor Wimpey supports the Council's recognition of meeting the needs of an ageing population but this should be couched in the context of an overall promotion of housing delivery. Taylor Wimpey also welcomes the inclusion of housing affordability as a key issue to be addressed in the Local Plan and it is anticipated that the Council will continue to apply an affordable housing policy requirement. Residential allocations are a vital means for ensuring the consistent delivery of high-quality affordable homes. Based on	

Respondent name	(3) Is there anything missing from the Spatial Portrait that should be added?	(4) Do you have any suggested amendments to the Spatial Portrait? Please provide details.	(5) Are there other important issues that have not been identified? Please provide details.	Council Response
	affordable homes. Based on the proposed development of up to 650 homes at Weeton Road, Taylor Wimpey could deliver up to 195 affordable homes to meet local affordable housing need. Taylor Wimpey also welcomes the direct reference to Kirkham and Wesham in the Spatial Portrait and supports the continued identification of the settlement as sustainable location for future residential development. In selecting new sites for the emerging Local Plan, Taylor Wimpey considers that significant weight should be granted to the sustainability credentials of sites, including its connectivity to the wider area and its ability to support and enhance public transport provision.	affordable homes. Based on the proposed development of up to 650 homes at Weeton Road, Taylor Wimpey could deliver up to 195 affordable homes to meet local affordable housing need. Taylor Wimpey also welcomes the direct reference to Kirkham and Wesham in the Spatial Portrait and supports the continued identification of the settlement as sustainable location for future residential development. In selecting new sites for the emerging Local Plan, Taylor Wimpey considers that significant weight should be granted to the sustainability credentials of sites, including its connectivity to the wider area and its ability to support and enhance public transport provision.	the proposed development of up to 650 homes at Weeton Road, Taylor Wimpey could deliver up to 195 affordable homes to meet local affordable housing need. Taylor Wimpey also welcomes the direct reference to Kirkham and Wesham in the Spatial Portrait and supports the continued identification of the settlement as sustainable location for future residential development. In selecting new sites for the emerging Local Plan, Taylor Wimpey considers that significant weight should be granted to the sustainability credentials of sites, including its connectivity to the wider area and its ability to support and enhance public transport provision.	
National Highways	Q3. WSP recommend that reference to the SRN is	Q4. WSP recommend 'no comment' to this question.	Q5. In reviewing the Local Plan to 2042, WSP recommends	Comments noted. Paragraph's 7.6 and 7.7 of the Spatial

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	included in the Spatial Portrait. The role of the motorway network in Fylde is crucial in supporting local residents and its economy within the towns and villages highlighted in the document. The SRN is also a key facilitator for providing access to tourist destinations in the Borough and it is important that visitor pressures on the SRN are taken into account.		that comment is provided on is the importance of development proposals across all locations are supported by a coordinated infrastructure strategy that aligns with national guidance, including DfT Circular 01/2022 and the principles of sustainable development. Key considerations include: • Ensuring that growth in strategic employment areas such as Warton, Whitehills, and Whyndyke is matched by transport infrastructure capable of supporting commuting patterns and safeguarding the SRN. • Supporting town centre vitality in Kirkham, Wesham, and Freckleton through active travel connectivity and public transport provision. • Managing development pressure in rural areas to avoid unsustainable expansion, protect high-grade agricultural	Portrait reference key parts of the highway network including the M55 and recent additions to the overall network.

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			land, and maintain biodiversity networks. i Promoting cross-boundary coordination, particularly in areas adjoining Blackpool and Preston, to ensure cohesive infrastructure delivery and service access. The LP should incorporate or reference transport evidence and strategic infrastructure planning to ensure that development is appropriately located, accessible, and aligned with national transport and environmental objectives.	
Natural England	Baseline information can shape the spatial portrait. Natural England has not reviewed the plans listed and signpost resources in Annex A. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to the plan area:			Comments noted. The Local Plan will include policies to protect the natural environment.

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	•Green and Blue infrastructure strategies •Local Nature Recovery Strategies (LNRS) •Biodiversity plans and strategies •Rights of Way Improvement Plans •River basin management plans •National Landscape and National Park management plans •Relevant landscape plans and strategies The Plan should include the natural environment in its long-term vision and objectives for the plan area. These should be based on local characteristics and circumstances and include locally specific goals for nature recovery and enhancement, supported by policies and proposals in the plan. This also includes the scope for plan area opportunities, alongside			

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	issues. In setting an overall strategy to guide development and allocate land the Plan should: •Conserve and enhance the natural environment, including landscapes and green infrastructure (GI) •Make as much use as possible of previously developed or 'brownfield' land •Allocate land with the least environmental or amenity value It should be recognised that some previously developed land is important for biodiversity as it can contain the open mosaic habitats (dataset), a priority habitat.			
Pegasus Group for Rowland Homes		Q4-7 Spatial Portrait and Vision 2.8. Rowland Homes only have a couple of minor points on the spatial portrait and the vision. Principally, the vision should		Comments noted.

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		acknowledge the provision that the rural area, especially larger rural settlements, can make in ensuring a good mix of housing sites capable of maintaining the deliverable and developable supply of housing land across the Plan period. 2.9. Aligned with this, a more positive approach to housing needs would be welcomed, not just meeting, but exceeding all types of housing needs across Fylde. 2.10. This also needs to be considered in co-operation with adjacent Boroughs and if the need to co-operate on housing needs is a clear requirement, then this should also be reflected in the Vision,		
PWA Planning for Dixon Grange The Villa	3.1. The Spatial Portrait provides a reasonable summary of the borough's characteristics and correctly identifies the high quality of	3.4. The key issue is not simply a need for more housing in the abstract, but a need for the right kind of housing in the right locations. Whilst the		Comments noted. The new Local Plan will include policies and sustainable allocations that meets the OAN figures and delivers a mix of housing

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	life, rich heritage, and strong economy that make Fylde an attractive place to live. Dixon Grange particularly notes the description of the borough's towns and villages and the importance of their distinct character. 3.2. However, when identifying the Key Issues," we believe the consultation understates the most critical challenge facing the borough: the need to identify a sufficient supply of deliverable, high-quality, and sustainable housing sites to meet a significantly increased housing requirement. 3.3. While issues such as heritage and coastal protection are important, the central strategic problem the new Local Plan must solve is the fundamental misalignment between the borough's objectively assessed housing need (OAHN) and the constrained land supply that	principle of including The Villa within the settlement boundary is to support the existing leisure/tourism use, there is potential given the sustainable location to also deliver on housing (supporting the existing use), as such the site is a direct and immediate answer to this challenge. A key issue for the new Plan will be whether its policies are flexible enough to unlock such sustainable opportunities or if they will remain a barrier to meeting the borough's needs, amending the settlement boundary in this regard, particularly for Wrea Green would help support this, albeit more could be done further as discussed in the subsequent text.		appropriate to the borough's needs including housing that meets the needs of an aged and ageing population and housing for families and young people. Settlement boundaries will be reviewed and will take into account new allocations.

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	results from the current Plan's overly restrictive policies.			
PWA Planning for Medicom	The Spatial Portrait provides a reasonable summary of the borough's characteristics. We particularly note the identification of Warton as a "significant settlement" and the home of BAE Systems, a strategic employment site of national importance. This correctly establishes Warton as a highly sustainable location with a critical economic function.		3.2. However, the "Key Issues" section understates the single most significant challenge facing the borough: the need to accommodate a substantially higher level of housing growth and the fundamental misalignment between this requirement and the constrained land supply under the current strategy. 3.3. The central problem the new Local Plan must solve is how to find sustainable and deliverable sites to meet its dramatically increased Objectively Assessed Housing Need (OAHN). The key issue is not simply whether to provide more housing, but how to do so sustainably. This requires the plan to include a mechanism for reviewing all land supply options, including the Green Belt. Therefore, a	As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde.

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			critical issue for the new Plan is its ability to identify and release sustainable, previously developed 'Grey Belt' sites in locations like Warton, where development can support a major employment hub and minimise the need to travel.	
PWA Planning for Pringle Homes	3.1. The Spatial Portrait provides a reasonable summary of the borough's characteristics and correctly identifies the high quality of life, rich heritage, and strong economy that make Fylde an attractive place to live. Pringle Homes particularly notes the description of the borough's towns and villages and the importance of their distinct character.		3.2. However, when identifying the "Key Issues," we believe the consultation understates the most critical challenge facing the borough: the need to identify a sufficient supply of deliverable, high-quality, and sustainable housing sites to meet a significantly increased housing requirement. 3.3. While issues such as heritage and coastal protection are important, the central strategic problem the new Local Plan must solve is the fundamental misalignment between the borough's objectively assessed housing need (OAHN) and the	The new Local Plan will include policies and sustainable allocations that meets the OAN figures and delivers a mix of housing appropriate to the borough's needs including housing that meets the needs of an aged and ageing population and housing for families and young people. Comments in relation to Greenlands Farm noted.

Respondent name	(3) Is there anything missing from the Spatial Portrait that should be added?	(4) Do you have any suggested amendments to the Spatial Portrait? Please provide details.	(5) Are there other important issues that have not been identified? Please provide details.	Council Response
			constrained land supply that results from the current Plan's overly restrictive policies. 3.4. The key issue is not simply a need for more housing in the abstract, but a need for the right kind of housing in the right locations. The Greenlands Farm site is a direct and immediate answer to this challenge. It is a deliverable site promoted by a high-quality local housebuilder, located on the edge of Wrea Green, a settlement identified in the existing Local Plan as a sustainable Tier 1 Larger Rural Settlement with an excellent range of local services and transport links. A key issue for the new Plan will be whether its policies are flexible enough to unlock such sustainable opportunities or if they will remain a barrier to meeting the borough's needs.	

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PWA Planning	3.1. The Spatial Portrait provides a reasonable summary of the borough's characteristics. However, for the purposes of preparing a sound Local Plan, we believe the "Implications for the Local Plan" and "Key Issues" sections understate the most significant challenge facing the borough: the need to accommodate a substantially higher level of housing and economic growth than has been planned for previously.	3.2. While issues such as heritage protection, coastal defence, and the vitality of town centres are important, they are secondary to the primary strategic function of the Local Plan, which the NPPF makes clear is to meet the area's objectively assessed development needs in full. The key issue, therefore, is not simply whether to provide for housing for older people or improve affordability, but how to plan for a quantum of growth that is significantly larger than that in the current Local Plan, and what that means for the existing spatial strategy and designated constraints. 3.3. The most critical issue for the new Local Plan to address is the fundamental misalignment between the borough's objectively assessed housing need (OAHN) under the Government's standard		The new Local Plan will include policies and sustainable allocations that meets the OAN figures and delivers a mix of housing appropriate to the borough's needs including housing that meets the needs of an aged and ageing population and housing for families and young people.

Respondent name	(3) Is there anything missing from the Spatial Portrait that should be added?	(4) Do you have any suggested amendments to the Spatial Portrait? Please provide details.	(5) Are there other important issues that have not been identified? Please provide details.	Council Response
		methodology and the constrained land supply that results from the current Plan's strategy. This is the central problem the new Local Plan must solve to be found sound.		
S&L for Oakmere Homes		Paragraph 2.59 of the Spatial Portrait referring to the Rural Areas should be deleted or modified as the current wording is ambiguous and infers that sustainable rural villages should not grow during the extended plan period to 2042. That approach is not sound and conflicts with the Council's preferred distribution of development in Option 1 of the consultation which proposes to retain the Existing Development Strategy whereby around 90% of additional new housing development will be located at the four Strategic Locations for Development and around 10% will be located in Non-Strategic		2.59 merely describes the situation of pressure for enlargement of rural villages, it does not discuss the benefits and disbenefits of additional growth. A key principle governing the spatial strategy and the location of development sites will be the need to deliver sustainable development.

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		Locations which include Tier 1 and Tier 2 Rural Settlements. Whilst excessive growth should be controlled, a level of appropriate housing growth can, and should, take place at and/or around suitable villages to maintain the vitality of rural communities and help them thrive by supporting local services and meeting the housing needs of surrounding rural areas in accordance with NPPF 83. Appropriate growth of around 10% of housing needs is positive and will not result in a need for 'additional facilities normally found in towns' as, even with some further growth, the population sizes of the sustainable Rural Settlements in Fylde are not sufficient to support facilities found in towns.		
Steven Abbott Associates for	The success of farms in delivering employment opportunities e.g. Bradkirk	Yes. Paragraph 2.39 and the fourth stated issue could be misleading and needs	How the needs of micro businesses and SMEs could be met spatially across the district	The aim of the Spatial Portrait is to establish the characteristics of the area and to use this to

Respondent name	(3) Is there anything missing from the Spatial Portrait that should be added?	(4) Do you have any suggested amendments to the Spatial Portrait? Please provide details.	(5) Are there other important issues that have not been identified? Please provide details.	Council Response
Bradkirk Business Park	Business Park (e.g. see 4.1.3 - Fylde Council - Business and Industrial Land Schedule March 2023)	reviewing. Delete the words 'are limited' from paragraph 2.39. This is not appropriate in a portrait but an unduly negative observation about one aspect. The growth needed in Kirkham Wesham as one of the strategic locations should be seen as an opportunity not a problem. One aspect of that is for higher frequency local bus services. Similarly, the final bullet point should not talk about 'maintaining sufficient bus services' but promoting bus services in parallel with new residential and expanded employment areas.	with a focus on the strategic locations, Kirkham-Wesham in particular	identify key issues. In this context, the wording at 2.39 is appropriate. The Local Plan shall provide for the requirements of local businesses and small firms and specifies "the sustainable growth and expansion of all types of business is supported where this is in accordance with other policies in the Local Plan".
Turley for Strategic Land Group	1.11 The IVSD provides a description of the borough, setting out the most significant features of places is provided in a Spatial Portrait. These are common features of Local Plans and are used to identify the key issues affecting each			Comments noted

Respondent name	(3) Is there anything missing from the Spatial Portrait that should be added?	(4) Do you have any suggested amendments to the Spatial Portrait? Please provide details.	(5) Are there other important issues that have not been identified? Please provide details.	Council Response
	other that will need addressing in the future Local Plan. 1.12 The Spatial Portrait provides separate commentary on St Annes, Lytham and Ansdell and Fairhaven to replace the combined section on Lytham St Annes. 1.13 At a borough wide level, the Spatial Portrait reveals the following: • A population profile which is strongly slanted towards older age groups • A strong economy but a significant amount of net in-commuting • Issues with housing affordability 1.14 The Spatial Portrait also identifies the constraints on the Borough's existing towns and villages in their ability to accommodate more development, including new homes, owing to a scarcity of suitable land opportunities and other			

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	constraints such as flood risk, Green Belt and habitat designations. This includes St Annes on Sea, Lytham, Ansdell and Fairhaven and Kirkham and Wesham. 1.15 However, the Spatial Portrait recognises that Whitehills and Whyndyke – the new name for the Fylde-Blackpool Periphery - are newly developing areas adjoining the edge of Blackpool. Whitehills benefits from an established area for employment uses so that housing development can result in short journeys to work for those choosing to live and work in the area, although the Spatial Portrait acknowledges that further infrastructure and facilities are required to be delivered within the area to ensure the area becomes as self-sufficient as possible. It also acknowledges that the area is much			

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	less constrained and has a number of development opportunities (such as Peel Hill Farm) available. 1.16 SLG concludes that the Spatial Portrait paints a reasonably accurate picture and the important issues that the Local Plan needs to address.			

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
Alban Cassidy	Yes	n/a	Comment noted.
Anna Briggs	No	n/a	Commented noted.
Bryning with Warton Parish Council	No	Do not support the vision unless commercial developments are included, along with new highway infrastructure(s) and potentially doctors & schooling facilities. The need for a high level of agreed infrastructure before development builds. i.e. The Level of housing in Warton is high following the development of 7 new housing estates in the village with no additional infrastructure. Additional commercial premises to support the local community would have been a benefit recognising the large scale developments.	Comment noted. The vision proposes that new commercial developments will have avoided utilitarian design and provide appropriate character to ensure sustainable growth within the borough The Plan will include commercial sites. Please refer to Non-Strategic Policy SLD1: St Annes (including Squires Gate) Strategic Location for Development, Non-Strategic Policy SLD2: Whitehills and Whyndyke Strategic Location for Development, Strategic Policy ECD3: Blackpool Airport and Enterprise Zone, Strategic Policy ECD5: Protection of Existing Employment Areas, Strategic Policy ECD6: Employment Opportunities and Commercial/ Employment Premises, Strategic Policy ECD7: Town, District, Local and Neighbourhood Centres, Strategic Policy ECD10: Demonstrating Viability for further information. The Plan will also deliver local services and infrastructure to proactively drive and support sustainable economic development, including the delivery of infrastructure. The plan will enhance connectivity from development sites to facilities including the town centre.

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
			This includes transport. Please refer to Non-Strategic Policy IFR2: Developer Contributions, Non-Strategic Policy IFR4: Transport Infrastructure Projects, Strategic Policy IFR5: Enhancing Sustainable Transport Choice for further information. The Plan aims to establish how further development of new commercial uses to support the settlement can be accommodated at sustainable locations. Local services include doctors' surgery, schools, public library's, pubs and shops. Strategic Policy ENT5: Loss of Community, Leisure and Cultural Facilities and Services states protection measures of local community facilities across the Borough. Please refer to the policy for further information. The Council acknowledges the amount of growth within Warton and will ensure that supporting facilities can be provided. Due to the degree of growth, it is critical that existing facilities, including community facilities are protected. The Council will protect and provide appropriate development of BAe systems Warton Aerodrome site and the Enterprise Zone.
Claire Parker for Blackpool Council	Yes	n/a	Comment noted.
David Chedd	No	The vision does not recognise the obvious unsustainability of	Comment noted. Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient

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		continuing to develop agricultural land and to accept uncontrolled population growth. There are limits to how many humans this borough, this country and this planet can sustain, particularly living as most here do nowadays, in ways and on a scale that has only been possible historically through the exploitation of finite resources. When what government demands of local authorities is unrealistic it should be challenged.	quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The vision states that ‘the highest quality agricultural land will have been protected from development.’ The Council will direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development (St Annes (including Squires Gate, Whitehills and Whyndyke, Warton, Kirkham and Wesham). The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations.
Emma Swindells	Yes	n/a	Comment noted.
Ethan Ellison	Yes	n/a	Comment noted.
Frank Andrews	n/a	ensure new housing is shared between all settlements not just the popular ones like Wrea Green	Comments noted. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
			the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four strategic locations for development will be: St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period.
Frank Andrews	Yes	n/a	Comment noted.
Gerard Malone	Yes	n/a	Comment noted.
Hannah Dell'Armi	Yes	n/a	Comment noted.

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Haydn Payne (on behalf of the Caravan and Motorhome Club)	Yes	n/a	Comment noted.
Irene Jacques	Yes	Keep it simple, save time and costs.	Comment noted.
John Leadbeater	Yes	n/a	Comment noted.
John Maskell	Yes	n/a	Comment noted.
Keith Gorton	Yes	n/a	Comment noted.
Keith McKay	Yes	See above comments	Comment noted.
Linda Nulty	n/a	This "Vision" would be great if it had been the vision for previous 20 years. SO much bad planning allowed there is little hope of the new vision being implemented. Ther attractiveness of rural Fylde is being lost daily. When all space is already taken up by housing and trees removed, it is hard	The Council acknowledges the comments. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development.

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		to imagine how "Open space can be provided and woodland cover increased" STOP thinking of Fylde as simply a "coastal resort" and start thinking Fylde as a whole area - Coast, urban AND Rural	The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Strategic Policy DST2: Settlement Boundaries will be used to assess settlement boundaries against Local Plan policies. Strategic Policy DST3: Green Belt will be used protect the Green Belt. Strategic Policy DST4: Areas of Separation will be used to help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements. Strategic Policy DST5: The Countryside will be used to support areas outside settlements which are not identified as Green Belt or Areas of Separation are identified as Countryside Areas. Please refer to the policies map for guidance of how policies will be used to identify and support the coastal, urban, and rural parts of the Borough.

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Lytham St Annes Civic Society	Yes	Yes, but with amendments. Consider the following: High quality design should be standard for smaller re-developments as well as new developments. Lytham Festival should not be part of the vision as it needs to be properly assessed in terms of impact on the Green and on Lytham in general. Need to ensure not too many shops are lost to hospitality venues or the towns will lose a lot of what attracts people to them. Thriving retail areas are becoming hard to find so a good balance of quality shops will draw visitors in to the towns. Greater impact assessments required.	Comments noted. High quality design is a key principle in all development. Non-strategic Policy HOU12: Replacements of, and Extensions to, Existing Homes in the Countryside will protect small rural traditional homes. The vision uses high quality attractions and organised events such as Lytham Festival to demonstrate an increase in the number of visitors during the events. The Council will ensure that development is achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. As part of the emerging Local Plan the Council will balance the needs of town centre businesses with the need to maintain the high quality historic environment that attracts people to the town. Protect important green spaces particularly Lytham Green. Keep any remaining employment land available for take up by employment uses. Ensuring thriving town centres is a key priority for the Council, both for providing services to residents but also to contribute to the attraction of the towns for visitors, as part of the overall tourism offer. Strategic Policy ECD7: Town, District, Local and Neighbourhood Centres provides designated areas for each of St Annes, Lytham and Kirkham Town Centres, and for Ansdell District Centre. In these areas development of uses that are contrary to the aims of

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			the town centre are restricted. Please refer to the policy for further information.
Marcus Dowling	Yes	n/a	Comment noted.
Martin Alderman	Yes	n/a	Comments noted
Mrs B Wildish	No	The eastern side of Fylde needs attention and development. In very recent years Fylde towns and villages including and east of Kirkham are considered to be part of Preston: notably since Preston's city status and it's aggressive 'western development' are being realised. Rural Fylde, currently PR4 needs to become FY9	Comments noted In recent years Warton has experienced significant growth in recent years, as a consequence it is necessary to ensure that supporting facilities can be provided. New/ expanded convenience retail units have been provided. Given this degree of growth, it is critical that existing facilities, including community facilities are protected. The Local Plan will focus on how further development of new commercial uses to support the settlement can be accommodated at sustainable locations • Protect and improve existing facilities • Location of new development sites • Protect and appropriate development of BAE Systems Warton Aerodrome site and the Enterprise Zone. Freckleton has not been taken forward as a strategic location in the previous Local Plan, mainly due to the green belt constraint. The green belt remains a constraint to development. The Local Plan will protect existing services and facilities including heritage assets. Kirkham and Wesham are being taken forward as Strategic Locations for Development. The plan will focus on

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			maintaining the recovery of Kirkham Town Centre • Identifying new sites for the next period • Providing connectivity for pedestrians and cyclists including schoolchildren from development sites to existing facilities including the town centre • Maintaining sufficient bus services in support of development sites away from the town centre. The Plan will maintain the rural character and attractiveness of the countryside as well as ensuring that rural settlements will retain their individual characteristics.
P Stanford		Quote for you to add – “Fylde BC will protect existing countryside and NOT allow development on green field sites or in countryside areas” IMHO, FBC needs to be MUCH, MUCH FIRMER – say what residents think and want - and just say NO ! OK .. it might be challenging to say this .. BUT after all that’s YOUR job to protect the Fylde and represent residents	Comments noted. Strategic Policy DST5: The Countryside will outline a criteria restricting development within the countryside to protect the area. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Development will be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde’s historic, environmental, social and economic assets. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small

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			sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham.
Philip Bickerstaff	No	The new enterprise and development zone at BAE systems will require additional land to support smaller supply businesses	Comment noted The purpose of the Warton EZ is to provide land for businesses associated with BAE The associated firms within the Warton Enterprise Zone have sufficient land to operate within the EZ designation and consequently no additional land is being provided. The Council has sufficient land to meet its needs that do not lie in the Green Belt and no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde in the Local Plan. A minor, non-strategic change is being made to the Green Belt boundary at the BAE Warton Aerodrome. This is at the western boundary of the aerodrome and is to allow BAE systems to further expand its operations. In consequence of the amount of growth that is occurring it is necessary to ensure that supporting facilities can be provided. New/ expanded convenience retail units have been provided. Warton has only a very small central area, with retail and other services dispersed along the length of the A584 Lytham Road. The existing Local Plan has sought to bring forward a coordinated local centre; schemes have been prepared for a programme of improvement works.

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			Other improvements have been made to road junctions to assist traffic flow. Given this degree of growth, it is critical that existing facilities, including community facilities are protected. The plan will identify how further development of new commercial uses to support the settlement can be accommodated at sustainable locations.
Stephen and Jacqueline Croft	Yes	The vision mentions increasing housing for older residents - but the stress should be on suitable/appropriate/desirable housing reflective of the lifestyle this demographic want and need with an eye also on the trends given these houses will be the future for generations. This involves access to a wide range of other facilities (doctors, dentists, social care, community activities, walkable environment etc.) which is not prominent in the vision thus far.	Comment noted. The Council recognises that there is a need to plan for an aged and ageing population. It is important that the housing mix provided on new development sites meets needs, including needs for an older population. When considering mix, these are not only needs of those not in accommodation, but those seeking accommodation of a different size or type, sometimes in a different area. The need for significant numbers of relatively small units of housing is increasing, driven partly (but not entirely) by the ageing population. The 2021 Census shows that in Fylde, 73% of households consisted of one or two people, and 34% of households consisted of a single person. Whilst it is a matter for those households to decide how large a dwelling they live in, it is clearly necessary to ensure that enough smaller units of housing are available to provide choice. People moving into smaller units of accommodation when the household reduces in size allows

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			the release of a larger unit of accommodation which then meets demand for a larger unit. Strategic Policy HOU2: Density and Mix of Housing will make provision for people in need of specific types of accommodation. Policy HOU2 makes reference to the overall matters to be considered but the detail of how this should be met is set out in individual policies relating to the specific group in need. Please refer to Strategic Policy HOU2 for further information regarding the density, mix of dwelling sizes, and housing for specific groups. Strategic Policy ENT5: Loss of Community, Leisure and Cultural Facilities and Services will protect facilities such as swimming pools, sports clubs and facilities, social clubs, religious buildings, public houses, community halls, cafes, local shops, health facilities and school buildings. Communities can, separately, seek to take community control of assets by declaring them Assets of Community Value, through separate legislation. Strategic Policy ECD10: Demonstrating Viability will set out a range of parameters that will enable the Council to make a fair and robust assessment of whether there is a justifiable case for whatever change of use is proposed. Strategic Policy IFR5: Enhancing Sustainable Transport Choice will improve the provision of routes for cyclists and pedestrians. Developments will be required to improve community health and wellbeing by providing and

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			encouraging take-up of alternative means of transport such as walking and cycling. Please refer to Strategic Policy IFR5 for further information. The Infrastructure Delivery Plan (IDP) will detail the infrastructure required up to 2042 to deliver the Local Plan.
Steven Abbott	Yes	n/a	Comment noted.
Asteer Planning for Applethwaite	Yes	3.9 Applethwaite supports the Fylde in 2042 vision as set out within the consultation documents. It is considered that the development of the site at Blackpool Road is in alignment with the vision and can contribute to some of the key elements including providing new development that fits comfortably into the existing context of the surrounding area, of high quality design and with accessible link for pedestrians and cyclists. The development of the site will be respectful of the existing character of Newton-with-Scales, enhancing the individual identity and providing an appropriate type, tenure, design, density and mix to address local needs and issues of affordability.	Comment noted.

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Defence infrastructure Organisation	n/a	The Vision correctly includes consideration of jobs and homes and goes on to support regionally important employment sites. Weeton Barracks and MOD Inskip are of national importance due to their contribution to national defence outputs. The Vision should acknowledge these important sites and its support for unfettered continuation and where necessary enhancement to these sites.	Weeton Barracks is a non-strategic Tier 2 Smaller Rural Settlements. The plan will ensure that planning policies and decisions recognise and support development required for operational defence and security purposes. Please refer to Strategic Policy HOU7: Weeton Barracks Service Accommodation for further information. Strategic Policy IFR3: Protection of Strategic National Infrastructure will ensure that development and mitigation measures for the impacts of development, will not be permitted where it would prejudice the safety of or restrict the operation of selected sites including MOD Inskip. Please refer to Strategic Policy IFR3 for further information.
Environment Agency	The Environment Agency support the overall Fylde in 2042 Vision. However, we would recommend the inclusion of the topics climate change and flood risk.	The Environment Agency support the overall Fylde in 2042 Vision. However, we would recommend the inclusion of the topics climate change and flood risk. The issue of climate change cuts across all of the other topics in one way or another. The preparation of the local plan comes when the expected impacts of climate change and the urgency of mitigating and adapting to them are becoming more important to our future. The impacts of new development on climate change and the subsequent effects on the environment, society	Development will be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change and flood risk. The Council will ensure that the right infrastructure is in place to support future development and this includes the Green Infrastructure network. The Green Infrastructure network has a vital role in climate change adaption and mitigation and flood alleviation and management. Strategic Policy DSA1: Achieving Good Design in Development proposes that development proposals should consider measures to mitigate the effects of climate change by the incorporation of energy and water efficiency

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		and the economy across Fylde, will be influenced by the policies of the Local Plan. The ultimate aim should be to ensure development across the local plan area is sustainable having regard to international and national policies, agreements and guidance that is in place to try and avoid the worst-case scenarios associated with climate change. This is particularly important when planning for the quantum development across Fylde, especially in the instance that the housing target for the plan area significantly increases. Development should be sustainable, safe and resilient to climate change and should be directed away from inappropriate areas, such as those at risk of flooding.	in new and existing buildings and 'grey' water and rainwater harvesting. Adaptation to climate change should be achieved through the design and orientation of buildings to maximise solar gain, minimise external surface areas of buildings across a development site by minimising the use of single detached buildings, provide shelter from the elements and take advantage of natural light and ventilation. Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency proposes that all new development is required to minimise flood risk impacts on the environment, retain water quality and water efficiency, and mitigate against the likely effects of climate change on present and future generations. Please refer to the Climate Change, Renewable Energy and Flood Risk Policies: Strategic Policy: CCH1 Flood Alleviation, Water Quality and Water Efficiency; Strategic Policy CCH2: Surface Water Run-Off and Sustainable Drainage; Strategic Policy CCH3 Renewable and Low Carbon Energy Generation – excluding onshore wind turbines for further information.
DLP Planning for BAE Systems	The Vision for Fylde refers to the importance of the Enterprise Zone at Warton Aerodrome as a major local employer and a regionally important economic site. BAE Systems supports this reference and the support that	The Vision for Fylde refers to the importance of the Enterprise Zone at Warton Aerodrome as a major local employer and a regionally important economic site. BAE Systems supports this reference and the support that the emerging Local Plan Vision provides in ensuring that the	(6;7) The Council supports this. The vision will now state 'Strategic, nationally-important manufacturing sites at BAE Systems, Warton (and its Enterprise Zone).... will have provided for significant economic growth. A key objective of the Local Plan will be to promote sustainable development to ensure that jobs and services

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	the emerging Local Plan Vision provides in ensuring that the importance of the Enterprise Zone remains during and beyond the Local Plan period. However, the vision makes no reference to the economic and employment role of the areas of Warton Aerodrome outside of the Enterprise Zone. BAE Systems' operational areas of the Aerodrome are just as important in terms of employment generation and economic investment as the Enterprise Zone and will continue to be so throughout the Plan period. This needs to be reflected in the Local Plan Vision.	importance of the Enterprise Zone remains during and beyond the Local Plan period. However, the vision makes no reference to the economic and employment role of the areas of Warton Aerodrome outside of the Enterprise Zone. BAE Systems' operational areas of the Aerodrome are just as important in terms of employment generation and economic investment as the Enterprise Zone and will continue to be so throughout the Plan period. This needs to be reflected in the Local Plan Vision.	are available locally to promote a vibrant and healthy economy. In doing so, the Council will support business growth through maintaining employment land supply and supporting growth at strategically important employment sites such as Warton Aerodrome. The Local Plan recognises Warton Aerodrome as a strategic nationally important industrial site and will ensure that development of BAE Systems Warton Aerodrome site and t will be appropriate and protected where necessary. Strategic Policy ECD1: BAE Systems, Warton further highlights this. Please see the Policy for further information.
Gladman	4.3.1 Gladman supports the emerging Local Plan's vision, particularly its emphasis on meeting housing needs and delivering homes in sustainable locations. However, Gladman considers that the current wording of	4.3.1 Gladman supports the emerging Local Plan's vision, particularly its emphasis on meeting housing needs and delivering homes in sustainable locations. However, Gladman considers that the current wording of the vision should be amended to provide greater clarity	The Vision includes reference to meeting housing needs.

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	the vision should be amended to provide greater clarity and certainty in addressing current and future housing needs in the borough. Specifically, Gladman recommends that the vision is amended to state: "New homes will have been developed to meet housing needs in full".	and certainty in addressing current and future housing needs in the borough. Specifically, Gladman recommends that the vision is amended to state: "New homes will have been developed to meet housing needs in full".	
Historic England	Historic England supports the vision for Fylde.	n/a	Comment noted.
Home Builders Federation	9. The HBF supports that the Vision specifically spells out that new homes will be developed to meet housing needs. This is important so as to ensure development is undertaken in a sustainable way.	Producing a new Vision for Fylde to 2042 10. Whilst the reference to meeting housing needs is important, the Vision would benefit from saying that this will be achieved through the development of a variety of sites, in a variety of sizes and in a variety of sustainable locations. 11. It is also important that housing needs is aligned to the area's economic development ambitions so there is an appropriate balance between new homes and jobs. If this means seeking a figure that goes beyond the Local Housing Need	Comments noted. The Council supports this. The Vision will state: 'People will have the opportunity to access services and jobs close to where they live. New homes will have been developed to meet housing needs. New housing areas will have been developed at sustainable locations, with safe pedestrian/cycle access to all necessary local facilities. A range of specialist accommodation will have been completed to provide for the needs of an ageing population. Affordability of homes will have improved as a result of the mix of new homes provided.' The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for

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		(LHN) calculated through the Standard Method, then this should be done. 12. Similarly, if it is the case that cooperation in meeting housing needs is undertaken with neighbouring Boroughs, then this should be referred to in the Vision.	the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy as set out above notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
Lichfields for Taylor Wimpey	Producing a new Vision for Fylde to 2042 Taylor Wimpey supports Fylde's Vision and the recognition that new homes are essential to meet local housing needs, both in terms of market and affordable tenure. Taylor Wimpey also supports the notion that new housing should be directed towards the most sustainable locations with safe pedestrian and cycle access to local facilities. Whilst the Vision sets out the primacy of both market and affordable housing delivery, Taylor Wimpey considers that the Vision	n/a	The Council supports this. The vision will state that 'People will have the opportunity to access services and jobs close to where they live. New homes will have been developed to meet housing needs. New housing areas will have been developed at sustainable locations, with safe pedestrian/cycle access to all necessary local facilities. A range of specialist accommodation will have been completed to provide for the needs of an ageing population. Affordability of homes will have improved as a result of the mix of new homes provided.'

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	should expressly seek that new development provides a range of house types and sizes. Similarly, Taylor Wimpey concurs that high quality design is a key principle for a new residential development, a fundamental element that influences its own design process. The Vision takes account of ensuring new development sites comfortably within the context of the surrounding area. It is noted that Taylor Wimpey has placed significant attention on design and placemaking in the Delivery Statement for Weeton Road and should be considered favourably when selecting prospective residential allocations accordingly.		
National Highways	Q6. WSP recommend that National Highways supports the 2042 Vision, which is considered appropriate at this	Q7. It is recommended that any potential to upgrade motorway junctions (as listed in the vision) is discussed with National Highways,	Comments noted. The Council will implement several infrastructure and transport policies in the plan. Please see the following policies for further information: Strategic Policy IFR1: Service Accessibility and

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	relatively early stage in the LP process. As the LP develops, the Vision should include objectives that will enforce policies set out in the DfT Circular (01/2022), supporting the vision-led development agenda. To support its delivery, it is recommended that the LP include mechanisms to ensure alignment between spatial growth and infrastructure capacity, particularly in relation to transport, flood risk and service provision. The Vision's emphasis on sustainable locations and active travel is supported; however, further clarity is needed on how strategic employment sites will be integrated with residential areas to reduce reliance on private vehicles. Additionally, the Vision should reference the role of the SRN and the importance of cross-boundary infrastructure coordination, in	and other relevant stakeholders, at the earliest opportunity, ensuring that proposals are suitable to accommodate planned growth in the Borough and are in line with the appropriate policies and guidance.	Infrastructure, Non-strategic Policy IFR2: Developer Contributions, Strategic Policy IFR3: Protection of Strategic National Infrastructure, Non-Strategic Policy IFR4: Transport Infrastructure Policy, Strategic Policy IFR5: Enhancing Sustainable Transport Choice, Non-Strategic Policy IFR6: Parking Provision. Further clarity is needed on how strategic employment sites will be integrated with residential areas to reduce reliance on private vehicles The Council welcomes engagement with National Highways.

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	line with Department for Transport Circular 01/2022.		
Pegasus Group for Rowland Homes	n/a	Q4-7 Spatial Portrait and Vision 2.8. Rowland Homes only have a couple of minor points on the spatial portrait and the vision. Principally, the vision should acknowledge the provision that the rural area, especially larger rural settlements, can make in ensuring a good mix of housing sites capable of maintaining the deliverable and developable supply of housing land across the Plan period. 2.9. Aligned with this, a more positive approach to housing needs would be welcomed, not just meeting, but exceeding all types of housing needs across Fylde. 2.10. This also needs to be considered in co-operation with adjacent Boroughs and if the need to co-operate on housing needs is a clear requirement, then this should also be reflected in the Vision,	The vision will state that: ‘The requirement for high quality design as a key principle in all development will have led to new housing areas that are valued for their appearance, layout and how they contribute to the attractiveness of the wider settlements, but which still function effectively. New housing areas will have been developed at sustainable locations, with safe pedestrian/cycle access to all necessary local facilities. A range of specialist accommodation will have been completed to provide for the needs of an ageing population. Affordability of homes will have improved as a result of the mix of new homes provided.’ ‘The rural character and attractiveness of the countryside areas of the Fylde will have been retained and enhanced. Rural settlements in Fylde will have retained their individual identities and heritage assets and their distinctive features will have been protected, enhanced and promoted; all development will have respected and conserved the character of these settlements. The release of land away from the main settlements for development will have been minimised and the highest quality agricultural land will have been protected from development. Rural settlements will have had provision of housing of an appropriate type, tenure, design, density and mix to address local needs and issues of affordability. In rural areas the rural economy will thrive, in particular small and medium sized enterprises.’

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
			The plan will note the rural area as a non-strategic location: Tier 1 Larger Rural Settlements and Tier 2 Smaller Rural Settlements that are not one of the strategic locations in the development strategy. This comprises: • Lytham • Ansdell • Freckleton • Newton • Staining • Wrea Green • Weeton • Weeton Barracks • Clifton • Elswick • Singleton including Little Singleton. Strategic Policy HOU2: Density and Mix of Housing will state that the requirement to ensure that a mix of smaller homes is provided is particularly acute in rural settlements, where there is a limited supply of smaller units. Therefore the policy provides a specific requirement for smaller homes in rural settlements. A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision.

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			The plan will state national policy as set out above notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
PWA Planning for Dixon Grange The Villa	3.5. Yes, Dixon Grange strongly supports the ambition and direction of the draft Vision. It rightly aspires to a dynamic and prosperous future where high-quality, sustainable homes are delivered to meet the needs of all residents. The Vision's focus on creating well-designed new housing areas, enhancing the unique qualities of the borough's villages, and respecting the character of the countryside. The Villa and the associated land already functions as part of the settlement of Wrea Green, it's inclusion within the boundary is therefore a logical extension to a site largely comprising urban features.	3.6. While we support the Vision's intent, its laudable ambitions can only be achieved if the new Local Plan is bold enough to allocate the sustainable sites required to deliver it. The extension of the settlement boundary, to include The Villa is a tangible example of how the Vision can be realised. Strategic Amendments to the Vision 3.7. For the Vision it to be an effective and deliverable framework for a sound Local Plan, it also requires strengthening. Its current wording does not fully grasp the scale of the challenge or the proactivity required by national policy. The Vision's ambitions can only be achieved through a new, bold, and comprehensive Local Plan, not by simply extending the strategy of the old one. 3.8. Our key recommendations for	Comments noted. The Council conducted a Strategic Housing and Economic Land Availability Assessment (SHELAA) to evaluate the suitability, availability, and achievability of sites submitted by developers and landowners. The vision will boost the delivery of sustainable homes and economic growth in accordance with the Local Plan Development Strategy, supported by the necessary facilities, services, infrastructure and access to modern telecommunications. Strategic Policy DST1: The Development Strategy will state that a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land over the plan period to 31 March 2042. Development will be focused in four strategic locations: St Annes (including Squires Gate); Whitehills and Whyndyke; Warton; and Kirkham and Wesham. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
		amending the Vision are as follows: 1. Commit to Meeting Needs in Full: The Vision's ambition "to boost the delivery of sustainable homes" is too passive. To be compliant with the NPPF, the Vision must be more explicit. It should be amended to state that Fylde will be a place that has "met its objectively assessed needs for housing and economic growth in full, providing a sufficient number and range of homes to meet the needs of present and future generations." This change would ground the Vision firmly in the requirements of national policy and set a clear, non-negotiable goal for the plan-making process. 2. Acknowledge the Need for a New Strategic Approach: The Vision cannot be delivered by the current development strategy. The housing numbers required are far in excess of what the existing strategy was designed to accommodate. Therefore, the Vision should acknowledge the need for a step-change in approach. It should state that the new Local Plan will deliver a	growth can be fully accommodated at the nationally important site. Please refer to Strategic Policy DST3: Green Belt for further information. The Vision will prioritise sustainability and state that the Council will 'deliver sustainable homes and economic growth in accordance with the Local Plan Development Strategy.... New housing areas will have been developed at sustainable locations....The rural character and attractiveness of the countryside areas of the Fylde will have been retained and enhanced.' The Vision should be read alongside the Development Strategy which will ensure that plans promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth, delivery and infrastructure; improve the environment; mitigate climate change and adapt to its effects.

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
		"new spatial strategy that identifies the most sustainable locations for growth, including comprehensively planned urban extensions and a strategic review of all land supply options to ensure development needs to 2042 are met." This provides the necessary justification for considering options beyond the confines of the previous plan, including a review of the Green Belt, which will be essential to deliver the Vision's housing and economic goals. 3. Frame Growth Positively: The Vision states that "the release of land away from the main settlements will have been minimised". While understandable, this wording is restrictive and defensive. A more positive and policy-compliant framing would be to state that "development will have been delivered in a sustainable pattern that enhances the vitality of existing settlements and delivers well-designed new communities, while respecting the character of the countryside." This allows for the possibility of necessary,	

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
		well-planned strategic land releases, which will be unavoidable if objectively assessed needs are to be met. 3.9. In conclusion, the draft Vision is a positive starting point, but its laudable ambitions are currently untethered from the reality of the borough's development needs. Without these amendments, there is a significant risk of a "deliverability gap" between the Vision's aspirations and the plan's ability to achieve them. A strengthened, more explicit Vision will provide the necessary mandate for the Council to undertake the comprehensive review required to produce a sound, ambitious, and genuinely pro-growth Local Plan for Fylde to 2042	
PWA Planning for Medicom	3.4. Yes, we broadly support the ambition and direction of the draft Vision. It rightly aspires to a dynamic, prosperous, and sustainable	3.5. While we support the draft Vision's intent, for it to be an effective and deliverable framework for a sound Local Plan, it requires strengthening. Its current wording	Comments noted. The vision will state that 'People will have the opportunity to access services and jobs close to where they live. New homes will have been developed to meet housing needs. New housing areas will have been developed at sustainable locations, with safe

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
	future for Fylde, recognising the importance of boosting the delivery of homes and economic growth.	does not fully grasp the scale of the challenge or the proactivity required by national policy. The Vision's ambitions can only be achieved through a new, bold, and comprehensive Local Plan, not by simply extending the strategy of the old one. 3.6. Our key recommendations for amending the Vision are as follows: 1. Commit to Meeting Needs in Full: The Vision's ambition "to boost the delivery of sustainable homes" is too passive. To be compliant with the NPPF, the Vision must be more explicit. It should be amended to state that Fylde will be a place that has "met its objectively assessed needs for housing and economic growth in full, providing a sufficient number and range of homes to meet the needs of present and future generations." This change would ground the Vision firmly in the requirements of national policy and set a clear, non-negotiable goal for the plan-making process. 2. Acknowledge the Need for a New Strategic Approach: The Vision	pedestrian/cycle access to all necessary local facilities. A range of specialist accommodation will have been completed to provide for the needs of an ageing population. Affordability of homes will have improved as a result of the mix of new homes provided.' The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. This will be further supported by the plans housing policies, specifically Strategic Policy HOU1: Housing Requirement and Supply; Strategic Policy HOU2: Density and Mix of Housing. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Strategic Policy DST5: The Countryside will restrict development to those types which are appropriate to a rural area and support agriculture, other existing rural businesses and rural communities. An exception is provided for the existing developed sites identified in the policy, where there is a presumption for development within the sites in accordance with relevant policies.

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
		cannot be delivered by the current development strategy. The housing numbers required are far in excess of what the existing strategy was designed to accommodate. Therefore, the Vision should acknowledge the need for a step-change in approach. It should state that the new Local Plan will deliver a "new spatial strategy that identifies the most sustainable locations for growth, including comprehensively planned urban extensions and a strategic review of all land supply options to ensure development needs to 2042 are met." This provides the necessary justification for the Council to identify and release sustainable 'Grey Belt' sites like School Farm to meet its housing needs. 3. Frame Growth Positively: The Vision's statement that "the release of land away from the main settlements will have been minimised" is restrictive and pre-judges the outcome of a necessary Green Belt review. A more positive	

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
		and policy-compliant framing would be to state that "development will have been delivered in a sustainable pattern that enhances the vitality of existing settlements and delivers well-designed new communities, while respecting the character of the countryside." This allows for well-planned extensions to sustainable settlements, such as the opportunity presented at School Farm, to be properly considered as a core part of the strategy. 3.7. In conclusion, the draft Vision is a positive starting point, but its laudable ambitions are currently untethered from the reality of the borough's development needs. Without these amendments, there is a significant risk of a "deliverability gap" between the Vision's aspirations and the plan's ability to achieve them. A strengthened, more explicit Vision will provide the necessary mandate for the Council to undertake the comprehensive review required to	

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
		produce a sound, ambitious, and genuinely pro-growth Local Plan for Fylde to 2042.	
PWA Planning for Pringle Homes	3.5. Yes, Pringle Homes strongly supports the ambition and direction of the draft Vision. It rightly aspires to a dynamic and prosperous future where high-quality, sustainable homes are delivered to meet the needs of all residents. The Vision's focus on creating well-designed new housing areas, enhancing the unique qualities of the borough's villages, and respecting the character of the countryside aligns perfectly with the development ethos of Pringle Homes.	3.6. While we support the Vision's intent, its laudable ambitions can only be achieved if the new Local Plan is bold enough to allocate the sustainable sites required to deliver it. The Greenlands Farm proposal is a tangible example of how the Vision can be realised, and we believe the Vision should be strengthened to more explicitly support such opportunities. • Linking Vision to Action: The Vision's goal for "New housing areas will have been developed at sustainable locations, with safe pedestrian/cycle access to all necessary local facilities" is precisely what the Greenlands Farm site offers. The site is a short, walkable distance from the amenities of Wrea Green via existing lit footways. • High-Quality Design: The Vision's aspiration for "high quality design" that creates valued and attractive	Comments noted. The vision will state that new housing areas will have been developed at sustainable locations which aligns with the plans objective of promoting sustainable development by sustainable pattern through development strategy, development directed to sustainable locations, restricted development in rural areas, good access to jobs and services availability locally, climate change resilient (flood risk). The Council conducted a Strategic Housing and Economic Land Availability Assessment (SHELAA) to evaluate the suitability, availability, and achievability of sites submitted by developers and landowners. The vision should be read alongside the plans housing policies which states that the Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. To support this the vision will state that 'People will have the opportunity to access services and jobs close to where they live. New homes will have been developed to meet housing needs. New housing areas will have been developed at sustainable locations, with safe

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		places is the hallmark of a Pringle Homes development. As demonstrated in the Design Concept Brochure, the proposal for Greenlands Farm is meticulously shaped by the distinctive Arts and Crafts character of the local area, delivering a high-quality, landscape-led scheme. • Enhancing the Environment: The Vision seeks a borough where "the rural character and attractiveness of the countryside areas... will have been retained and enhanced." The Greenlands Farm proposal actively delivers on this by committing to the redevelopment of the derelict and unsightly former piggery buildings. This would remove a blight on the landscape, transforming an area of neglect into a high quality community asset and delivering a significant and immediate enhancement to the character and visual amenity of this part of the countryside. 3.7. To enable the delivery of sites like Greenlands Farm and meet the borough's wider needs, the Vision itself requires strengthening to	pedestrian/cycle access to all necessary local facilities. A range of specialist accommodation will have been completed to provide for the needs of an ageing population. Affordability of homes will have improved as a result of the mix of new homes provided.' The vision should be read alongside Strategic Policy: DST5 The Countryside which restricts development to those types which are appropriate to a rural area and support agriculture, other existing rural businesses and rural communities. An exception is provided for the existing developed sites identified in the policy, where there is a presumption for development within the sites in accordance with relevant policies. To support this, the vision will state that: 'the rural character and attractiveness of the countryside areas of the Fylde will have been retained and enhanced. Rural settlements in Fylde will have retained their individual identities and heritage assets and their distinctive features will have been protected, enhanced and promoted; all development will have respected and conserved the character of these settlements. The release of land away from the main settlements for development will have been minimised and the highest quality agricultural land will have been protected from development. Rural settlements will have had provision of housing of an appropriate type, tenure, design, density and mix to address local needs and issues of affordability. In rural areas the rural economy will thrive, in particular small and medium sized enterprises.'

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		provide a clear mandate for a truly pro-growth plan. Strategic Amendments to the Vision 3.8. For the Vision it to be an effective and deliverable framework for a sound Local Plan, it also requires strengthening. Its current wording does not fully grasp the scale of the challenge or the proactivity required by national policy. The Vision's ambitions can only be achieved through a new, bold, and comprehensive Local Plan, not by simply extending the strategy of the old one. 3.9. Our key recommendations for amending the Vision are as follows: 1. Commit to Meeting Needs in Full: The Vision's ambition "to boost the delivery of sustainable homes" is too passive. To be compliant with the NPPF, the Vision must be more explicit. It should be amended to state that Fylde will be a place that has "met its objectively assessed needs for housing and economic growth in full, providing a sufficient number and range of homes to meet the needs of present and future	

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		generations." This change would ground the Vision firmly in the requirements of national policy and set a clear, non-negotiable goal for the plan-making process. 2. Acknowledge the Need for a New Strategic Approach: The Vision cannot be delivered by the current development strategy. The housing numbers required are far in excess of what the existing strategy was designed to accommodate. Therefore, the Vision should acknowledge the need for a step-change in approach. It should state that the new Local Plan will deliver a "new spatial strategy that identifies the most sustainable locations for growth, including comprehensively planned urban extensions and a strategic review of all land supply options to ensure development needs to 2042 are met." This provides the necessary justification for considering options beyond the confines of the previous plan, including a review of the Green Belt, which will be essential to deliver the	

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		Vision's housing and economic goals. 3. Frame Growth Positively: The Vision states that "the release of land away from the main settlements will have been minimised". While understandable, this wording is restrictive and defensive. A more positive and policy-compliant framing would be to state that "development will have been delivered in a sustainable pattern that enhances the vitality of existing settlements and delivers well-designed new communities, while respecting the character of the countryside." This allows for the possibility of necessary, well-planned strategic land releases, which will be unavoidable if objectively assessed needs are to be met. 3.10. In conclusion, the draft Vision is a positive starting point, but its laudable ambitions are currently untethered from the reality of the borough's development needs. Without these amendments, there is a significant risk of a "deliverability gap" between the Vision's aspirations and the plan's	

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		ability to achieve them. A strengthened, more explicit Vision will provide the necessary mandate for the Council to undertake the comprehensive review required to produce a sound, ambitious, and genuinely pro-growth Local Plan for Fylde to 2042.	
PWA Planning	3.4. Yes, we broadly support the ambition and direction of the draft Vision. It rightly aspires to a dynamic, prosperous, and sustainable future for Fylde, recognising the importance of boosting the delivery of homes and economic growth, supported by necessary infrastructure. The Vision aligns with the overarching objectives of sustainable development set out in the NPPF.	3.5. While we support the draft Vision's intent, for it to be an effective and deliverable framework for a sound Local Plan, it requires strengthening. Its current wording does not fully grasp the scale of the challenge or the proactivity required by national policy. The Vision's ambitions can only be achieved through a new, bold, and comprehensive Local Plan, not by simply extending the strategy of the old one. 3.6. Our key recommendations for amending the Vision are as follows: 1) Commit to Meeting Needs in Full: The Vision's ambition "to boost the delivery of sustainable homes" is too	Comments noted. The vision will state that new housing areas will have been developed at sustainable locations which aligns with the plans objective of promoting sustainable development by sustainable pattern through development strategy, development directed to sustainable locations, restricted development in rural areas, good access to jobs and services availability locally, climate change resilient (flood risk). The Council conducted a Strategic Housing and Economic Land Availability Assessment (SHELAA) to evaluate the suitability, availability, and achievability of sites submitted by developers and landowners. The vision should be read alongside the plans housing policies which states that the Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly,

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		passive. To be compliant with the NPPF, the Vision must be more explicit. It should be amended to state that Fylde will be a place that has "met its objectively assessed needs for housing and economic growth in full, providing a sufficient number and range of homes to meet the needs of present and future generations." This change would ground the Vision firmly in the requirements of national policy and set a clear, non-negotiable goal for the plan-making process. 2) Acknowledge the Need for a New Strategic Approach: The Vision cannot be delivered by the current development strategy. The housing numbers required are far in excess of what the existing strategy was designed to accommodate. Therefore, the Vision should acknowledge the need for a step-change in approach. It should state that the new Local Plan will deliver a "new spatial strategy that identifies the most sustainable locations for growth, including comprehensively planned urban extensions and a	the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. To support this the vision will state that 'People will have the opportunity to access services and jobs close to where they live. New homes will have been developed to meet housing needs. New housing areas will have been developed at sustainable locations, with safe pedestrian/cycle access to all necessary local facilities. A range of specialist accommodation will have been completed to provide for the needs of an ageing population. Affordability of homes will have improved as a result of the mix of new homes provided.' The vision should be read alongside Strategic Policy: DST5 The Countryside which restricts development to those types which are appropriate to a rural area and support agriculture, other existing rural businesses and rural communities. An exception is provided for the existing developed sites identified in the policy, where there is a presumption for development within the sites in accordance with relevant policies. To support this, the vision will state that: 'the rural character and attractiveness of the countryside areas of the Fylde will have been retained and enhanced. Rural settlements in Fylde will have retained their individual identities and heritage assets and their distinctive features will have been protected, enhanced and promoted; all development will have respected and conserved the character of these settlements. The release of land away

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		strategic review of all land supply options to ensure development needs to 2042 are met." This provides the necessary justification for considering options beyond the confines of the previous plan, including a review of the Green Belt, which will be essential to deliver the Vision's housing and economic goals. 3) Frame Growth Positively: The Vision states that "the release of land away from the main settlements will have been minimised". While understandable, this wording is restrictive and defensive. A more positive and policy-compliant framing would be to state that "development will have been delivered in a sustainable pattern that enhances the vitality of existing settlements and delivers well-designed new communities, while respecting the character of the countryside." This allows for the possibility of necessary, well-planned strategic land releases, which will be unavoidable if objectively assessed needs are to be met.	from the main settlements for development will have been minimised and the highest quality agricultural land will have been protected from development. Rural settlements will have had provision of housing of an appropriate type, tenure, design, density and mix to address local needs and issues of affordability. In rural areas the rural economy will thrive, in particular small and medium sized enterprises.' As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde.

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
		3.7. In conclusion, the draft Vision is a positive starting point, but its laudable ambitions are currently untethered from the reality of the borough's development needs. Without these amendments, there is a significant risk of a "deliverability gap" between the Vision's aspirations and the plan's ability to achieve them. A strengthened, more explicit Vision will provide the necessary mandate for the Council to undertake the comprehensive review required to produce a sound, ambitious, and genuinely pro-growth Local Plan for Fylde to 2042.	
Sport England	Given the importance attached in paragraph 3.2 of the consultation document to prioritising locations for development to promote healthy lifestyles and the importance attached to planning policies enabling and supporting healthy lives in	n/a	The Council will encourage healthy lifestyles throughout the plan. The vision will state 'Additional pedestrian and cycle routes provided by new developments will have improved active travel participation through walking and cycling.' This will promote healthy living. Strategic Policy ECD7: Town District, Local and Neighbourhood Centres further states that. Please refer to the policy for further information.

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	paragraph 96 of the NPPF, the vision should cover how the Local Plan will promote healthy lifestyles. For example, the vision could cover how development in Fylde will 'provide opportunities for the community to be physically active' or 'support the delivery of active environments'. This is pertinent in view of the demographics of the local population and the level of growth proposed in the Local Plan.		
Steven Abbott Associates for Bradkirk Business Park	Generally, yes, but subject to the answers above and below	As above	Comment noted.
Turley for Strategic Land Group	1.17 The IVSD presents a revised Vision for Fylde, which has been drafted with the Vision statement from the Corporate Plan providing the introductory line which summarises the approach to the rest of the Vision.	1.19 However, the proposed Vision needs to be bolder and more ambitious as to what should be achieved at the SDL at Whitehills and Whyndyke. Further context and explanation is provided below.	Strategic Policy DST1: The Development Strategy shows further detail on development locations including Whitehills and Whyndyke. The policy will state that a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land over the plan period to 31 March 2042. Of such, 2,147 housing

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	1.18 SLG supports the production of a new Vision. The Vision in the existing Local Plan is outdated. A number of strategic infrastructure projects have been completed, notably the improvement of Fairhaven Lake and Gardens, M55 to Heyhouses Link Road and Preston Western Distributor Road. A new Vision is required to reflect the economic and housing ambition of the Government.		commitment units will be delivered in Whitehills and Whyndyke. In addition, Non-Strategic Policy SLD2: Whitehills and Whyndyke Strategic Location for Development focuses on development in Whitehills and Whyndyke. Please refer to the above policies for further information.
United Utilities	n/a	Uuw considers a Vision to the local plan to be critical. We request that the proposed vision includes clear references to the need for sustainable communities, which are resilient to climate change. Sustainability and climate resilience should be 'golden threads' that guide the preparation of policy in the local plan.	The Vision will state the importance of sustainable homes within sustainable locations that encourage sustainable living such as active travel this will help mitigate the impacts of climate change. The vision will prioritise Green and Blue infrastructure to enhance environmental benefits. A key objective of the plan will be to promote sustainable development to mitigate climate change and adapt to its effects. Strategic Policy DSA1: Achieving Good Design in Development states further information regarding climate

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			change mitigation and adaptation. Please see policy for further information. Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency further demonstrates this. Please see policy for further information.
Woodland Trust	The Woodland Trust welcomes the strong emphasis within Fylde's 2042 Vision on increasing woodland cover, enhancing biodiversity, and improving access to green spaces. We are particularly pleased to see recognition of the vital role that Fylde's Green and Blue Infrastructure plays in supporting residents' health and wellbeing, contributing to climate resilience, and enriching the Borough's landscape character. We also welcome the recognition of biodiversity enhancement and protection of Fylde's ecological network. However, it will be equally important to ensure that existing woodland, veteran trees, and priority habitats are	The Vision should explicitly commit to preventing the loss or degradation of existing habitats, mapping and designating existing woodland and trees as critical natural assets to guide future development and incorporating long-term management plans for both new and existing green spaces.	Comments noted. The Plan will include several policies that aim to protect environments and assets. Please see the following policies for further information: Strategic Policy ENT1: Historic Environment, Non-Strategic Policy ENT2: Local Green Space, Strategic Policy ENT3: Protecting Existing Open Space and Sports Facilities, Strategic Policy ENT4: Provision of New or Enhanced Open Space and Sports Facilities, Strategic Policy ENT5: Loss of Community, Leisure and Cultural Facilities and Services, Strategic Policy ENT6: Protected Coastal and Wetland Assets, Non-Strategic Policy: ENT7 Coastal Change Management Areas, Strategic Policy ENT8 Landscape, Non-Strategic Policy ENT9 Natural Assets on Development Sites. The vision will state that 'Open space will have been provided, woodland cover increased and Fylde's unique offer of Green and Blue Infrastructure will be accessible and contribute to a high quality of life. Biodiversity, including Fylde's Ecological Network, will have been enhanced and protected from inappropriate development.' As the Borough includes wildlife sites with International designations. There is a legal requirement that the Council demonstrates that the Local Plan will result in no likely

Respondent name	(6) Do you support the Fylde in 2042 Vision as set out in the consultation?	(7) What changes do you think should be made to the Fylde in 2042 Vision if any?	Council Response
	afforded strong protection within future planning and development policies. Mature and ancient trees, ancient woodlands, and long-established hedgerows represent irreplaceable and ecologically vital habitats and must be safeguarded.		significant effects of the designated sites. Where likely significant effects are identified, an Appropriate Assessment is required to demonstrate that the integrity of the site would not be compromised. The results will be included when available. The vision should also be read alongside the plans protected environment and asset policies, specifically Policy ENT6: Protected Coastal and Wetland Assets; Strategic Policy: ENT8 Landscape; Policy ENT9: Natural Assets on Development Sites; Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency; Strategic Policy CCH2 Surface Water Run-Off and Sustainable Drainage.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
Alban Cassidy	The development strategy [in respect to key housing sites] to be taken forward should be option 1. This concentrates development in the most sustainable locations including the periphery of Lytham St Annes, Whyndyke and Whitehills and Kirkham. Separate representations are being submitted by this practice in respect to employment land and Blackpool Airport Enterprise Zone, in respect to residential development, concentrating development on larger sites that connect to existing settlements with substantial resources and facilities is most likely to assist the Council in achieving sustainable development. In these locations a number of large sites either have planning permission and are poised to move forward in 2026 with development being commenced including Whyndyke which is now progressing with a number of housebuilders] or are the subject of current planning applications [including land on the northern boundary of Lytham St Annes].	The Council acknowledges and supports these comments. Please refer to Strategic Policy DST1: The Development Strategy for further information.
Bryning with Warton Parish Council	No, As there hasn't been any contribution to any new infrastructure (following the generation of 6 new housing estates). Also damage to existing infrastructure (Hillock Lane) hasn't been satisfactorily addressed. Also the continued expansion of some of the places mentioned may be detrimental.	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		(including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. The Local Plan will not take Freckleton forward as a strategic location in the previous Local Plan, mainly due to the green belt constraint. The green belt remains a constraint to development. The Plan will protect existing services and facilities including heritage assets, including Freckleton. The Council identifies that a vital element of sustainable development is the provision and delivery of local services and infrastructure. However, lack of infrastructure should not be seen as an obstacle to development. Planning should proactively drive and support sustainable economic development, and this includes the delivery of infrastructure. Additionally, the Framework requires that planning policies should seek to address potential barriers to investment, including any lack of infrastructure.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		The Plan will adopt several infrastructure and transport policies to ensure that sufficient provision for infrastructure is delivered.
Claire Parker for Blackpool Council	Any development strategy chosen should include reference to existing strategic employment sites such as Blackpool Airport Enterprise Zone and opportunities for its future development. Further information is provided in the Supporting Letter, issued separately.	Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes. Changes include the areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		physically two separate areas on the ground, divided by the M55 and its junction. The Local Plan will ensure that within Whitehills and Whyndyke: - The provision of local facilities to serve the new housing areas. - Deliver cohesive and well-designed development. - Work with site promoters to ensure sites such as Whyndyke are brought forward. - Develop infrastructure to provide for walking, cycling and public transport to nearby facilities within Blackpool. - Choice of additional sites to be brought forward. - Ensuring a cross-boundary approach to the development of infrastructure to support the areas.
David Chedd	This looks about the best option but certain aspects of it have already been demonstrated as unsustainable and impractical, examples being the development of houses at Kirkham on land that floods, despite the objections of the local councillors, resulting in houses that now flood, unsustainable loss of agricultural land at Wesham at a time when UK food security ought to be one of the government's top priorities, and housing growth in rural areas where there are no or limited local services and facilities to sustain it.	As part of the emerging Local Plan the Council has conducted a Strategic Housing and Economic Land Availability Assessment (SHELAA). The assessment evaluates sites based on suitability, availability, and achievability of each site. An example of a factor that was assessed is sites flood risk, whereby if a large proportion of a site fell

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		within a flood risk zone or was exposed to surface water runoff then the site was identified as unsuitable and was not taken forward within the plan. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Strategic Policy DST5: The Countryside restricts development to those types which

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		are appropriate to a rural area and support agriculture, other existing rural businesses and rural communities. An exception is provided for the existing developed sites identified in the policy, where there is a presumption for development within the sites in accordance with relevant policies. This ensures that sites are not developed where there are limited local services and facilities.
Emma Swindells	No. Moving around Fylde eg. Warton to St Annes, the roads are so busy. Warton is at a standstill during rush hour traffic. There isn't enough secondary schools or colleges in the area so a lot of travelling involved.	The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Whyndyke will directly adjoin existing developed areas of Blackpool. Although Preston New Road will provide something of a physical barrier to movement between the areas, this can be overcome through effective provision of crossings and traffic management. Notwithstanding this, it is

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		intended that Whyndyke becomes as self-sufficient as possible, including convenience retail, public open space and primary school. Warton is a large village in the south of the Borough to the east of Lytham, separated from it by Green Belt. The dominant feature of the village is its large aerodrome to the south, between the village and the Ribble Estuary, and its associated large, strategically-important aerospace manufacturing plant. The settlement has two primary schools, regular bus services, public houses and a range of commercial facilities; however recent growth has highlighted the need for further facilities. The existing small Local Centre is subject to a current regeneration scheme to improve the public realm and encourage footfall. Kirkham has a town centre with a range of independent shops selling comparison goods and is one of the three town centres in the Borough. Wesham has a wide range of local facilities but there is no clearly defined centre. There are two secondary schools in Kirkham: one in the maintained sector and one private; there are six primary schools across the two settlements; there is also a school for pupils with special needs.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		The strategic development areas which will be included in the Development Strategy do/will have access to schools. The plan will implement several infrastructure and transport policies that will deliver local services and infrastructure including schools. The Local Plan aims to provide connectivity for pedestrians and cyclists including schoolchildren from development sites to existing facilities including the town centre. Strategic Policy IFR5: Enhancing Sustainable Transport Choice will improve accessibility across the Borough. Please see the policy for further information.
Ethan Ellison	No, I feel it constrains potential opportunities.	The Council do not accept that Option 1 is constraining. Under this option, development needs would be met with a focus on specific strategic locations. The four Strategic Locations are St Annes (including Squires Gate, Whitehills and Whyndyke, Warton, and Kirkham and Wesham. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The current housing commitments are: - St. Annes (including Squires Gate): 921 units; - Whitehills and Whyndyke: 2,147 units; - Warton: 204 units; - Kirkham and Wesham: 117 units. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the widest range of available facilities. Whitehills and Whyndyke form extensions to the adjoining settlement of Blackpool, which is the largest settlement in the Fylde Coast sub-region and has the widest range of facilities: the areas are developing two new Local Service Centres which will ensure that local facilities are provided, as well as enabling access to the widest range in Blackpool. Warton is home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		and therefore represent sustainable growth. Kirkham and Wesham have good access by sustainable public transport via its railway station to the wider sub-region and the North West as a whole; Kirkham is a market town with a historic town centre that has been subject to recent improvement and investment, which is capable of supporting a larger population than it currently does; the settlements are the locations for manufacturing employment which is being currently expanded. Accordingly all four locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan.
Frank Andrews	what is option 1??	Option 1 in set out in the consultation document and focuses the majority of development in four strategic locations: : • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Option 1 would retain the existing development strategy and build upon it.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
Frank Andrews	yes very much so	Comment noted.
Gerard Malone	Yes But see Option 3	Comment noted.
Hannah Dell'Armi	I agree with the areas used here, they meet the requirements of being well connected with places for people to work etc	Comment noted.
Haydn Payne (on behalf of the Caravan and Motorhome Club)	Option 1 is supported to allow for continued and focussed growth at the four locations identified, but particularly at Whitehills thereby helping to reduce the pressure for development in other, and potentially much more sensitive, locations.	Comments noted.
Irene Jacques	High quality developments are essential. Simplified approach. Continuity by retention of current plan.	Comments noted.
John Leadbeater	Not as regards Warton. The village has already had to accept a large number of houses with a consequential loss of green space and habitat. The allocation quoted should be significantly reduced. Additional time should be given for the assimilation of the existing housing estates already imposed on the area (against the wishes of most residents)	The Council recognises that in consequence of the amount of growth that is occurring it is necessary to ensure that supporting facilities can be provided. New/ expanded convenience retail units have been provided. Warton has only a very small central area, with retail and other services dispersed along the length of the A584 Lytham Road. The existing Local Plan has sought to bring forward a coordinated local centre; schemes

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		have been prepared for a programme of improvement works. Other improvements have been made to road junctions to assist traffic flow. The Council highlights the following issues within Warton which will be used as focus points for the Local Plan going forward: - How further development of new commercial uses to support the settlement can be accommodated at sustainable locations - Protection and improvement of existing facilities - Location of any new development sites - Protection and appropriate development of BAE Systems Warton Aerodrome site and the Enterprise Zone The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The current housing commitments are: - St. Annes (including Squires Gate): 921 units - Whitehills and Whyndyke: 2,147 units - Warton: 204 units - Kirkham and Wesham: 117 units The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the widest range of available facilities. Whitehills and Whyndyke form extensions to the adjoining settlement of Blackpool, which is the largest settlement in the Fylde Coast sub-region and has the widest range of facilities: the areas are developing two new Local Service Centres which will ensure that local facilities are provided, as well as enabling access to the widest range in Blackpool. Warton is home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		and therefore represent sustainable growth. Kirkham and Wesham have good access by sustainable public transport via its railway station to the wider sub-region and the North West as a whole; Kirkham is a market town with a historic town centre that has been subject to recent improvement and investment, which is capable of supporting a larger population than it currently does; the settlements are the locations for manufacturing employment which is being currently expanded. Accordingly all four locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan.
John Maskell	Yes. FBC must be robust in pursuing this option.	Strategic Policy DST1: The Development Strategy will provide robust information and guidance to demonstrate this. Please refer to the policy for further information.
Keith McKay	So far, development at Warton has not provided a good example - as yet, no supporting infrastructure (non planned?) and drainage issues	In consequence of the amount of growth within Warton the Plan will ensure that supporting facilities can be provided. New/ expanded convenience retail units have been provided. Warton has only a very small central area, with retail and other services dispersed along the length of the A584 Lytham Road. The existing Local Plan has sought to bring forward a coordinated local centre; schemes have been prepared for a

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		programme of improvement works. Other improvements have been made to road junctions to assist traffic flow. Given this degree of growth, it is critical that existing facilities, including community facilities are protected. Bryning-with-Warton Parish Council produced a Neighbourhood Plan (BWNDP) which was made in May 2017. Warton has a number of important green spaces which were identified by the BWNDP as Local Green Space, providing protection for those areas. There is no conservation area within Warton. Flood risk affects land on the coastal side of the aerodrome which is mainly salt marsh; there is also fluvial flood risk from Pool Stream and its tributaries to the east of the village. The BAE site and aerodrome is a secure site. Safeguarding zones to ensure the safety of aviation are applied around the site. Within the BAE site, areas are designated through a Local Development Order as being where further industrial development could occur without express planning permission, for uses appropriate to location within the secure site. These areas are part of the Lancashire Advanced Engineering and Manufacture Enterprise Zone (at Warton and at Samlesbury, east of Preston).

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		Strategic Policy CCH2 Surface Water Run-Off and Sustainable Drainage will outline measures that development must incorporate to ensure surface water management and sustainable drainage is effectively incorporated into new development. Please see policy for further information.
Linda Nulty	Emphasis needs to be placed on Whyndyke development . This is a very sustainable area with a plan already in existence for all kinds of development , which would help ease pressure on particularly Kirkham, Wesham and Warton. Now the link road is built the Queensway area of St Annes needs to be pushed forward to develop quickly. No more sites should be agreed for Kirkham and Wesham until these commitments are built out.	Whyndyke will directly adjoin existing developed areas of Blackpool. Although Preston New Road will provide something of a physical barrier to movement between the areas, this can be overcome through effective provision of crossings and traffic management. Notwithstanding this, it is intended that Whyndyke becomes as self-sufficient as possible, including convenience retail, public open space and primary school. Whyndyke (and Whitehills) alongside St Annes (including Squires Gate), Warton, and Kirkham and Wesham will be the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. DST1: The Development Strategy shows further information regarding the development strategy.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		strategic locations. The current housing commitments are: - St. Annes (including Squires Gate): 921 units - Whitehills and Whyndyke: 2,147 units - Warton: 204 units - Kirkham and Wesham: 117 units
P Stanford	No – will NEVER support more development in K&W (let alone the rest of Fylde) until existing infrastructure is improved. Eg - K&W needs a new Doctors, might suggest a 6th form in Kirkham, an NHS Dentist, highways in an acceptable state, efficient and safe A585 traffic management, safe crossings of A585, youth engagement services etc	The Council acknowledges this and as part of the Local Plan aims to maintain the recovery of Kirkham Town Centre, providing connectivity for pedestrians and cyclists including schoolchildren from development sites to existing facilities including the town centre, and maintaining sufficient bus services in support of development sites away from the town centre. Due to Kirkham and Wesham’s connectivity: Kirkham and Wesham railway station providing access to a wider range and more frequent services than the stations on the South Fylde Line, including Manchester and Liverpool, junction 3 of the M55 being close to the settlement, and Kirkham and Wesham’s employment areas, including significant sites close to the railway line as well as the nearby newly developing Mill Farm the Council identifies Kirkham and

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		Wesham as one of the four Strategic Locations for development as part of the Local Plan Development Strategy thereby the Plan will aim to identify new sites for the next period. The purpose of the Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to St Annes (including Squires Gate), Whitehills and Whyndyke, Warton, and Kirkham and Wesham. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. Please see Strategic Policy DET1: The Development Strategy for further information.
Philip Bickerstaff	No	Comment noted.
Steven Abbott	Yes. This the most sustainable and sensible approach.	Comment noted.
Asteer Planning for Applethwaite	3.11 Applethwaite consider that a new Development Strategy should pursue balanced spatial growth across the Borough, that ensure a level of growth across the Borough's sustainable settlements, rather than seeking to focus growth on the key service centres only, or on the periphery of the Borough in locations where growth may not support the vitality of Fylde Borough or its wide range of villages and settlements. 3.12 Applethwaite considers that it is	The Local Plan will provide sites for a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land over the plan period to 31 March 2042.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
	critical for the spatial portrait of Fylde to consider the importance of enabling sensitive, logical and appropriate extensions to Tier 1 Larger Rural Settlements to support their sustainability and meet the needs of local communities. Housing growth is essential to the vitality and vibrancy of these settlements, and ensuring an appropriate level of growth will support housing choice and provide housing for future generations. 3.13 Whichever spatial option is pursued, Applethwaite consider the site to represent the most suitable option for growth in Newton-with-Scales, in terms of its scale, location and the opportunity to logically and sensitively extend the existing settlement.	The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Non-strategic Locations for Development Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		windfall allowance of 40 homes per annum from year 4 of the plan period. Strategic Policy DST5: The Countryside restricts development to those types which are appropriate to a rural area and support agriculture, other existing rural businesses and rural communities. Please refer to the policy for further information.
Emery Planning for Persimmon & Charles Church	4.4 For these representations, Kirkham and Wesham is our focus. For Kirkham, the Issues for the Local Plan are set out in the consultation draft as follows: • Maintaining the recovery of Kirkham Town Centre; • Identifying new sites for the next period; • Providing connectivity for pedestrians and cyclists including schoolchildren from development sites to existing facilities including the town centre. • Maintaining sufficient bus services in support of development sites away from the town centre. 4.5 As one of the three Key Service Centres, Kirkham should continue to provide range of housing and employment opportunities through the allocation of land.	The Council supports this and the Local Plan will carry forward these issues into the emerging Local Plan. As Kirkham and Wesham will be identified as one of the four strategic locations for development as part of the development strategy, around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development.
Gladman	4.4.1 Gladman considers Option 1 to be the most suitable development strategy for the emerging Local Plan. This option builds upon a previously successful and effective approach that has consistently maintained housing delivery across the borough. The strategic development locations identified represent the most sustainable areas in the borough and are capable of accommodating further housing growth over the emerging plan period. Directing proportionate levels of growth to these locations again over the next plan period would support their status and role and ensure their continued vitality and viability. Largely replicating the adopted development strategy over the emerging plan period offers the most appropriate approach with the benefits significantly and demonstrably outweighing the	Strategic Policy DST1: The Development Strategy outlines the Councils development strategy. Please see the policy for further information. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
	negatives. 4.4.2 Gladman supports 90% of the housing growth over the emerging plan period being directed to the four strategic locations under this development strategy. However, Gladman submits that a specified level of housing growth should be allocated to each strategic development location so that each area receives a proportionate level of growth and a balanced development strategy is achieved. Critically, the development strategy should recognise that all settlements have development needs and should not overlook the needs of lower-tier settlements.	already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The current housing commitments are: - St. Annes (including Squires Gate): 921 units - Whitehills and Whyndyke: 2,147 units

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		- Warton: 204 units - Kirkham and Wesham: 117 units The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the widest range of available facilities. Whitehills and Whyndyke form extensions to the adjoining settlement of Blackpool, which is the largest settlement in the Fylde Coast sub-region and has the widest range of facilities: the areas are developing two new Local Service Centres which will ensure that local facilities are provided, as well as enabling access to the widest range in Blackpool. Warton is home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting and therefore represent sustainable growth. Kirkham and Wesham have good access by sustainable public transport via its railway station to the wider sub-region and the North West as a whole; Kirkham is a market town with a historic town centre that has been subject to recent improvement and investment, which is capable of supporting a larger population than it currently does; the

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		settlements are the locations for manufacturing employment which is being currently expanded. Accordingly, all four locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan.
Historic England	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP.	Comment noted. Strategic Policy ENT1: Historic Environment will state that proposals for development should conserve, protect, and where appropriate, enhance the character, appearance, significance and historic value of Fylde's designated and undesignated heritage assets, in particular: - The classic seaside resort of St Annes with its seafront, Victorian and Edwardian architecture and pier, together with the Promenade and Ashton Gardens. - The formal resort of Lytham with the Windmill and Green, and the cultural assets based around Lowther Pavilion and Garden, Lytham Hall and its historic parkland. - The historic market town of Kirkham

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		- The two planned model rural settlements of Singleton and Thistleton. Please refer to the policy for further information.
Home Builders Federation	Development Strategy Options 13.The consultation draft of the plan puts forward three options for a Development Strategy for the Borough. These are. •Option 1 - Retaining the Existing Development Strategy with Updates (based on the four strategic locations in the existing Local Plan). •Option 2 – Variant on the Existing Development Strategy. •Option 3 – Entirely New Development Strategy. 14.Whilst it is noted that Questions 8 – 16 asks for specific views on each option, the HBF considers that it is important that the Development Strategy allows for the delivery of sufficient homes to meet the local housing needs, across a range of housing types and in a variety of locations. This should include land for larger strategic allocations as well as smaller land parcels for small and medium sized house builders. 15.Within the consultation document, the Council refers to the Green Belt as a constraint which may affect the Development Strategy for the area. The HBF would remind the Council that the NPPF states that Green Belt boundaries can only be altered in exceptional circumstances, but crucially that exceptional circumstances include, but are not limited to, instances where an authority can-not meet its identified need for homes (paragraphs 145 and 146). 16.Therefore, if local housing needs in specific locations in the Borough can only be met by Green Belt release, then the Council should consider this as an exceptional circumstance.	Comments noted. The new Local Plan will take into account housing needs across the borough but in-line with national planning policy The Local Plan Development Strategy will be to continue to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. In applying this strategy, Local Plan policy will ensure the delivery of a broad mix of types and sizes of home, suitable for a broad range of age groups, that reflect the demographics and housing requirements of the Borough. It is the Council's view that it is able to identify sufficient land to meet its needs outside of the Green Belt. As such, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully

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	17.The HBF also notes that there are a number of allocations in the existing plan which have not yet been developed. The HBF considers that if these are to be ‘rolled forward’ to the new Local Plan, the Council will need to understand why these sites have not yet come forward and ensure that any issues identified can then be addressed in the new Local Plan so that these sites can be delivered. 18.The Development Strategy also appears in places to discount settlements for future growth on the basis that strategic allocations have already been built out (eg. paragraph 3.10). The HBF wishes to highlight that this plan will be covering a new plan period and the Development Strategy will need to be informed by housing needs over that new plan period, rather than being informed by what has taken place over a previous plan period.	accommodated at the nationally-important site. The allocation of sites will consider matters of deliverability and developability, including viability and the identification of any constraints to development.
Lichfields for Taylor Wimpey	Development Strategy Options Taylor Wimpey supports the retention of the adopted development strategy, including the four strategic locations for development and the principle of directing the majority of future growth towards the most sustainable, higher-order settlements. Housing delivery through the adopted plan period has demonstrated that sustained growth in these strategic locations is achievable, as evidenced by the figures presented in the Consultation Document. Taylor Wimpey welcomes the continued identification of Kirkham and Wesham as a strategic location for development. Taylor Wimpey considers this area to be one of the most sustainable settlements in the Borough that is well-placed to accommodate new development and meets local housing needs. Taylor Wimpey agrees with the Council’s commitment to pursuing a sustainable pattern of development, prioritising locations that offer inclusive access to local facilities and employment opportunities. The promotion of active travel and public transport is essential and these principles should be afforded significant weight in the site selection process. In this	Support for the retention of the adopted development strategy (option 1) and for the promotion of sustainable development is noted. The Council identifies Kirkham and Wesham as a sustainable area for development. The focus of the majority of housing delivery in the most sustainable areas of the borough is a legitimate strategic approach. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been

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	context, Taylor Wimpey's site at Weeton Road is considered to be a suitable residential allocation for inclusion in the emerging Local Plan. The site benefits from its proximity to the settlement and to Mill Farm, connectivity improvements already proposed as part of the current planning application further enhance its sustainability credentials. While the Consultation Document acknowledges existing commitments within strategic locations, Taylor Wimpey considers that a comprehensive review of existing allocations is necessary to assess their realistic prospect of delivery. This review should also identify new residential allocations capable of meeting local housing needs. Strategic sites in sustainable locations should be prioritised, and the boundaries of strategic development locations should not preclude development in otherwise sustainable countryside locations. In determining the need for new allocations, Taylor Wimpey agrees that this must be informed by Local Housing Need (LHN) and the Standard Method as a minimum to ensure sufficient housing delivery over the plan period. To inform this, future allocations should be selected based on overall merit, rather than through a rigid distribution of growth across the four strategic locations.	effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The current housing commitments are: - St. Annes (including Squires Gate): 921 units - Whitehills and Whyndyke: 2,147 units - Warton: 204 units - Kirkham and Wesham: 117
National Highways	Q8. WSP suggest that National Highways support Option 1, given that these locations for growth and development are within existing areas of density and infrastructure within the borough. However, further detail is needed on the transport evidence associated with the proposals for strategic development at these locations. The inclusion of Whitehills and Whyndyke, which are adjacent to M55 Junction 4, and Kirkham and Wesham, near Junction 3, requires careful consideration of potential cumulative transport impacts. Site allocations within strategic locations that have the potential to generate significant traffic volumes are required to be fully assessed given their proximity to the SRN to ensure that the site allocations support the resilience and safe operation of the SRN.	The Council acknowledges the comments. Transport evidence associated with the proposals for strategic development at locations included in Option 1 (St Annes (including Squires Gate), Whitehills and Whyndyke, Warton and Kirkham and Wesham) will be carefully considered. The plan will include Infrastructure and Transport Policies which will consider how footways, cycleways, highways, airports, railways, tramways, bus stops, bridleways, coach parking and park and ride are

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		sustainably implemented into locations and sites. The plan will include: Strategic Policy IFR1 Service Accessibility and Infrastructure, Non-Strategic Policy IFR4 Transport Infrastructure Projects, Strategic Policy IFR5 Enhancing Sustainable Transport Choice, Non-Strategic Policy IFR6 Parking provision. Please refer to the Infrastructure and Transport Policies for further information.
Pegasus Group for Rowland Homes	Paragraph 3.5 of the Plan confirms that within the current strategy there are four strategic locations for development, in which 90% of development was planned to be located. 3.3. It goes on to confirm that the strategic sites are still to be delivered fully in each of the four strategic locations. Therefore, any development strategy going forward will need to take account of the existing committed/allocated sites at the four strategic locations in the existing Local Plan. The current commitments/ allocations are: • Lytham and St. Annes 1,240 units out of 2,111 allocated • Fylde-Blackpool Periphery 2,055 units (880 beyond plan period) out of 2,050 allocated • Warton 392 units out of 1,305 allocated • Kirkham and Wesham 363 units out of 1,364 allocated 3.4. Although the previous Plan strategy has appeared to ensure a consistency of delivery in these locations, if these are to be 'rolled forward' to the new Local Plan, the Council will need to fully justify and evidence why these sites have not yet come forward and ensure that any issues identified can then be addressed in the new Local Plan so that these sites can be considered to be deliverable and developable (as the case may be). 3.5. What this does indicate is that any future strategy should not place so much reliance on	The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations.

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	such a small number of strategic locations, or a single strategic location, as is potentially proposed as part of one option. 3.6. With this in mind, and in order to comply with NPPF paragraphs 72 and 73, the Development Strategy should support the delivery of sufficient homes to meet the local housing needs, across a range of housing types and in a variety of locations. This should include land for larger strategic allocations as well as smaller land parcels for small and medium sized house builders.	The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The current housing commitments are: St. Annes (including Squires Gate): 921 units Whitehills and Whyndyke: 2,147 units Warton: 204 units Kirkham and Wesham: 117 units The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the widest range of available facilities. Whitehills and Whyndyke form extensions to the adjoining settlement of Blackpool, which is the largest settlement in the Fylde Coast sub-region and has the widest range of facilities: the areas are developing two new

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		Local Service Centres which will ensure that local facilities are provided, as well as enabling access to the widest range in Blackpool. Warton is home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting and therefore represent sustainable growth. Kirkham and Wesham have good access by sustainable public transport via its railway station to the wider sub-region and the North West as a whole; Kirkham is a market town with a historic town centre that has been subject to recent improvement and investment, which is capable of supporting a larger population than it currently does; the settlements are the locations for manufacturing employment which is being currently expanded. Accordingly all four locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of

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		homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. Strategic Policy HOU2: Density and Mix of Housing will state that A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50%

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		of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Please refer to Strategic Policy HOU2: Density and Mix of Housing for further information.
PWA Planning for Dixon Grange The Villa	4.2. The consultation presents three options. In our view, simply retaining the existing rigid strategy (Option 1) is not a credible option for meeting the borough's future needs, as it would fail to recognise the potential of highly sustainable sites adjacent to settlement boundaries, such as The Villa. 4.4. We object to Option 1. Retaining the existing development strategy, with its rigid focus on just four strategic locations and its restrictive 'Open Countryside' and 'Area of Separation' policies, is no longer fit for purpose. This approach would: 1) Fail to Meet Housing Need: It would not provide a sufficient supply or range of sites to meet the borough's significantly increased housing requirement. 2) Prevent Sustainable Development: It would actively prevent the allocation of highly sustainable and deliverable sites, simply because they fall outside a predefined strategic location or within a local designation like an Area of Separation. This is contrary to the NPPF's core principle of encouraging the effective use of land.	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate

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	3) Undermine Rural Vitality: It would continue to starve well-served, sustainable settlements like Wrea Green (a Tier 1 settlement) of the proportionate growth needed to support local services and facilities, contrary to the NPPF's objective of maintaining the vitality of rural communities. 4.5. Simply updating this demonstrably outdated and insufficient strategy is not a sound or sustainable way forward.	the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places.

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		The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a

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		significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate).

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		- The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. No distinction is made in the existing development strategy as to the relative importance of the four strategic locations, and no benchmark would be set for the number of units at each; rather, sites would be selected on overall merit, whilst maintaining a reasonable balance to the strategy. The updated development strategy takes a slightly more pragmatic approach, recognising where the most sustainable opportunities are, and how other locations present fewer sustainable sites. In relation to non-strategic locations, development is directed on the basis of the most sustainable pattern of development reflecting the opportunities from sites brought forward, rather than applying

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		benchmarks to individual settlements as were applied previously. Please refer to Strategic Policy DST1: The Development Strategy for further information. As stated in Strategic Policy SET1: The Settlement Hierarchy Wrea Green is identified as a Tier 1 Larger Rural Settlement therefore is a non-strategic location. There is a narrow strip of land between the settlement boundaries of Wrea Green and Kirkham, measuring 313 metres at its narrowest point, which is recognised as an area valued locally as part of the Green Infrastructure network. Similarly, there is a narrow strip of land between Newton and Kirkham. In both cases, it has been demonstrated in the Area of Separation Background Paper that, having considered each area against the criteria, there is potential for the gap between settlements to be compromised, which without protection would over time lead to the progressive coalescence of settlements leading to a loss of distinct identity. Consequently, the policy identifies two Areas of Separation, one between Wrea Green and Kirkham and the other between Kirkham and Newton. Please

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		refer to Strategic Policy: DST4 Areas of Separation for further information. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The housing requirement will be met as follows: - X,XXX from existing committed sites - 3,438 from new allocations as set out in Policies SLD1, SLD2, SLD3, SLD4, SLD5 - 520 from windfall sites, at a rate of 40 dwellings per annum from year 4 of the plan period onwards.
PWA Planning for Medicom	4.1. The Development Strategy is the most critical component of the Local Plan. It must establish an ambitious and deliverable framework for growth that is, above all, consistent with the principles of sustainable development set out in the NPPF. 4.2. The consultation presents three options. In our view, simply retaining the existing strategy (Option 1) is not a credible option as it fails to address the borough's increased housing need and ignores current national policy on the Green Belt. 4.4. We object to Option 1. Retaining the existing development strategy is no longer a sound or viable option. It fails to account for the significant increase in Fylde's housing need and, crucially, it ignores the new national policy mechanism for identifying and developing 'Grey Belt' land within the Green	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic,

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	Belt, as set out in paragraph 155 of the NPPF. 4.5. A strategy that would preclude a sustainable, previously developed site like School Farm located immediately adjacent to the major employment hub of Warton in favour of potentially less sustainable greenfield sites elsewhere, is fundamentally unsound. It fails the NPPF's core tests of being positively prepared and justified.	environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites.

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		A decision is then needed on the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no

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		development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate).

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		- The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. Please refer to Strategic Policy DST1: The Development Strategy for further information. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this

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		effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required.
PWA Planning for Pringle Homes	The Development Strategy is the most critical component of the new Local Plan. It must establish a positive and deliverable framework for growth that is consistent with the principles of sustainable development set out in the National Planning Policy Framework (NPPF). 4.2. The consultation presents three options. In our view, simply retaining the existing rigid strategy (Option 1) is not a credible option for meeting the borough's future needs, as it would fail to recognise the potential of highly sustainable sites like Greenlands Farm, Wrea Green. 4.4. We object to Option 1. Retaining the existing development strategy, with its rigid focus on just four strategic locations and its restrictive 'Open Countryside' and 'Area of Separation' policies, is no longer fit for purpose. This approach would: 1) Fail to Meet Housing Need: It would not provide a sufficient supply or range of sites to meet the borough's significantly increased housing requirement. 2) Prevent Sustainable Development: It would actively prevent the allocation of highly sustainable and deliverable sites, such as Greenlands Farm, simply because they fall outside a predefined strategic location or within a local designation like an Area of Separation. This is contrary to the NPPF's core principle of encouraging the effective use of land. 3) Undermine Rural Vitality: It would continue to starve well-served, sustainable settlements like Wrea Green (a Tier 1 settlement) of the proportionate growth needed to support local services and facilities, contrary to the NPPF's objective of maintaining the vitality of rural communities.	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
	4.5. Simply updating this demonstrably outdated and insufficient strategy is not a sound or sustainable way forward.	locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought

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		forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes:

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		- The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). - The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		the ground, divided by the M55 and its junction. Please refer to Strategic Policy DST1: The Development Strategy for further information. As stated in Strategic Policy SET1: The Settlement Hierarchy Wrea Green is identified as a Tier 1 Larger Rural Settlement therefore is a non-strategic location. There is a narrow strip of land between the settlement boundaries of Wrea Green and Kirkham, measuring 313 metres at its narrowest point, which is recognised as an area valued locally as part of the Green Infrastructure network. Similarly, there is a narrow strip of land between Newton and Kirkham. In both cases, it has been demonstrated in the Area of Separation Background Paper that, having considered each area against the criteria, there is potential for the gap between settlements to be compromised, which without protection would over time lead to the progressive coalescence of settlements leading to a loss of distinct identity. Consequently, the policy identifies two Areas of Separation, one between Wrea Green and Kirkham and the other between Kirkham and Newton. Please

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		refer to Strategic Policy: DST4 Areas of Separation for further information. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The housing requirement will be met as follows: - X,XXX from existing committed sites - 3,438 from new allocations as set out in Policies SLD1, SLD2, SLD3, SLD4, SLD5 520 from windfall sites, at a rate of 40 dwellings per annum from year 4 of the plan period onwards.
PWA Planning for Ribby Hall	3.1. The Development Strategy is the most critical component of the new Local Plan. It must establish a positive and deliverable framework for growth that is consistent with the principles of sustainable development set out in the National Planning Policy Framework (NPPF). Response to Question 8: Comments on Option 1 3.2. We object to Option 1. Retaining the existing development strategy, with its rigid focus on just four strategic locations and its restrictive 'Open Countryside' and 'Area of Separation'	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic,

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
	policies, is no longer fit for purpose. Simply updating this demonstrably outdated and insufficient strategy is not a sound or sustainable way forward.	environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		A decision is then needed on the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate).

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		- The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a

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		windfall allowance of 40 homes per annum from year 4 of the plan period. Please refer to Strategic Policy DST1: The Development Strategy for further information. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Please refer to Strategic Policy DST4: Areas of Separation for further information. Outside of the existing towns and main villages, the countryside is defined on the Policies Map as areas not covered by Green Belt or Areas of Separation. Designation is necessary to prevent uncontrolled development: without restriction, the countryside would be developed for very low-density housing at random locations, resulting in profligate use of land, the creation of homes in isolated locations.

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		Please refer to Strategic Policy DST5: The Countryside for further information.
PWA Planning	.1. The Development Strategy is the most critical component of the Local Plan. It establishes the overarching framework for the scale and distribution of growth and is the primary tool through which the Plan's Vision and Objectives will be delivered. The strategy must be ambitious, deliverable, and, above all, consistent with the principles of sustainable development set out in the NPPF. 4.2. The consultation document presents three options. In our view, simply retaining the existing strategy (Option 1) is not a credible option for meeting the borough's future needs. 4.4. We object to Option 1, which proposes retaining the existing development strategy focused on four strategic locations. This strategy was devised to meet a lower housing target under a previous national policy context and is no longer fit for purpose. Its principal failings are: 1) Insufficiency: The consultation document's own figures demonstrate that the existing strategic locations have limited remaining capacity and are substantially committed. They cannot, on their own, accommodate the significantly higher level of growth required to 2042. Persisting with this strategy will inevitably lead to a failure to meet the borough's OAHN, rendering the plan unsound. 2) Rigidity and Lack of Responsiveness: The four-location model is overly rigid and stifles the market's ability to bring forward sustainable sites elsewhere in the borough. It creates an arbitrary geographical constraint that is contrary to the NPPF's core principle of encouraging the effective use of land. It prevents the plan from responding positively to opportunities for sustainable development that may arise outside these four defined areas. 3) Undermines Sustainability: By concentrating almost all growth in just four areas, the strategy risks placing unsustainable pressure on infrastructure and services in those locations, while simultaneously starving other settlements of the investment and vitality that proportionate new development can bring. This is contrary to the NPPF's objective of supporting the vitality of rural communities.	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
	4.5. Simply updating this demonstrably outdated and insufficient strategy is not a sound or sustainable way forward.	accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained.

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		However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities.

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		- The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). - The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. Please refer to Strategic Policy DST1: The Development Strategy for further information.
S&L for J Edwards, J Marquis and A Marquis-Carr.	Yes - the Existing Development Strategy and the Warton Strategic Location for Development should be retained, and additional land should be allocated in connection with the Warton Strategic Location for Development, as well as maintaining a windfall allowance for non-allocated sites to come forward, to meet housing needs arising in the extended plan period to 2042. The Warton area has already delivered over 900 new homes under the adopted Local Plan and the village and surrounding area continues to be a popular and sustainable place to live. Housing growth will continue to take place in and around Warton as a Strategic Location for Development as land is either committed and/or allocated for 392 dwellings to be built before 2032 remaining from the 1,305 currently planned. It therefore makes sense that the Warton area should continue to be a focus for housing in the new plan period and, to do so,	The Council acknowledges these comments. All sites submitted have been assessed based on suitability, accessibility and achievability. Please refer to Strategic Policy DST1: The Development Strategy for further information. The four strategic locations provide the most sustainable developable locations for development of strategic size. Warton is

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
	additional land must be allocated, or otherwise enabled to come forward in accordance with development plan policy and a continued windfall allowance, to meet housing needs up to 2042. Our clients own land on the west side of Warton which we consider should be included as a housing allocation in the new Local Plan as part of the Warton Strategic Location for Development. It should also be included in the list of Large Developed Sites in the Countryside and Green Belt in Policy GD5, which should be carried forward into the new Local Plan as part of the Existing Development Strategy, so that it can come forward for housing-led redevelopment as a windfall site in the Green Belt. It has been submitted to the Council in response to the June 2025 Call for Sites as 'Land at Site 8, Lytham Road (A584), Warton'. The submission explains that the 5.6 hectare (net) site is previously developed land which is currently occupied by Lytham Golf Academy and contains areas of visible and buried concrete bases, hardstanding and roads remaining from the former RAF Lytham personnel transit and medical training camp built during WW2. The Council has confirmed in its approval of planning application 25/0053, relating to the eastern part of the former RAF base, that the site as a whole comprises previously developed land due to the mix of uses which have been carried out within it since the cessation of its use as an RAF base. The site also qualifies as grey belt in accordance with the NPPF Glossary definition as it is previously developed land which does not strongly contribute to Green Belt purposes (a), (b) or (d) as follows, and is not disqualified by any of the policies relating to the areas or assets listed in NPPF Footnote 7 which would otherwise provide a strong reason for resisting housing development: (a) to check the unrestricted sprawl of large built-up areas: Warton is a village and the planning practice guidance confirms that villages should not be considered large built up areas. Therefore, the land does not act as a critical buffer against uncontrolled expansion of a large built-up area. (b) to prevent neighbouring towns merging into one another: Warton is a village and the planning practice guidance confirms that purpose (b) relates solely to the merging of towns	home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting and therefore represent sustainable growth. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The Council has sufficient land outside the Green Belt to meet its needs. Therefore, there are no exceptional circumstances to justify a strategic Green Belt review in Fylde. One minor, non-strategic Green Belt boundary change has been made to land within the BAE Systems site at Warton to ensure strategic growth can be fully accommodated at this nationally important site.

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	and not villages. Therefore, the land does not play a significant role in preventing towns from merging. (d) to preserve the setting and special character of historic towns: Warton is not a historic town. Therefore, the land has no role in preserving the setting and special character of historic towns. The indicative masterplan submitted with the Call for Sites demonstrates that, in accordance with NPPF 148, the site is a suitable, achievable and available opportunity for housing development to meet local housing needs and it is a sustainable location with good pedestrian, cycling and public transport connections to Warton and Lytham. The site has potential to accommodate approximately 150 dwellings for market and affordable housing needs, set within landscaped open space, and there is strong interest in the site from major house builders.	
S&L for Oakmere Homes	Yes - the Existing Development Strategy and Wrea Green Non-Strategic Location should be retained, and additional land should be allocated as part of the Wrea Green Non-Strategic Location, as well as maintaining a windfall allowance, to meet housing needs arising in the extended plan period to 2042. As a Larger Rural Settlement (Tier 1), Wrea Green is a Non-Strategic Location which has successfully accommodated limited new housing development under the adopted Local Plan and the village continues to be a popular and sustainable place to live. It therefore makes sense that Wrea Green should continue to be an area where small-scale housing can take place in the new plan period and suitable sites can be allocated. Oakmere Homes owns land to the west of Wrea Green which we consider should be included as a housing allocation in the new Local Plan. It has been submitted to the Council in response to the June 2025 Call for Sites as 'Land south of Moss Side Lane (B5259), Wrea Green'. The submission explains that the 0.7 hectares (net) site is a highly-suitable, achievable and available opportunity for approximately 10 dwellings to meet local housing needs. The site is also an opportunity to locate new development close to Wrea Green but not adjoining its settlement boundary and, instead, being connected to the village by a bus route and pedestrian footway on Moss Side Lane (B5259), and with convenient walking and cycling access to Moss Side railway station.	The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1

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		Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. Please refer to Strategic Policy DST1: The Development Strategy for further information. There is a narrow strip of land between the settlement boundaries of Wrea Green and Kirkham, measuring 313 metres at its narrowest point, which is recognised as an area valued locally as part of the Green Infrastructure network. Similarly, there is a narrow strip of land between Newton and Kirkham. In both cases, it has been demonstrated in the Area of Separation Background Paper that, having considered each area against the criteria, there is potential for the gap between settlements to be compromised, which without protection

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		would over time lead to the progressive coalescence of settlements leading to a loss of distinct identity. Consequently, the policy identifies two Areas of Separation, one between Wrea Green and Kirkham and the other between Kirkham and Newton. Please refer to Strategic Policy DST4: Areas of Separation for further information.
S&L for River Properties	Yes - the Existing Development Strategy and the St Annes Strategic Location for Development (revised from being the Lytham and St Annes Strategic Location for Development) should be retained, and additional land should be allocated as part of the St Annes Strategic Location for Development to meet housing needs arising in the extended plan period to 2042. The St Annes Strategic Location for Development has already delivered over 800 new homes and new community facilities since 2010, and the area of Heyhouses on the northern edge of St Annes has become established as a popular and accessible new and expanded neighbourhood. Major housing growth will continue to take place in the Heyhouses area under the adopted Local Plan as land is either committed and/or allocated for 1,240 dwellings to be built before 2032 remaining from the 2,111 currently planned. It therefore makes sense that the Heyhouses area within the St Annes Strategic Location for Development should continue to be a focus for housing and other growth in the new plan period and, to do so, additional land must be allocated to meet housing needs up to 2042. The Council has considered this previously and stated its preference for where additional land should be identified for allocation at Heyhouses as part of the St Annes Strategic Location for Development. This is set out in the Preferred Options version of the Part 1 Fylde Local Plan to 2032 which was published for consultation between June and August 2013. Under Policy SL1 it proposed two additional housing allocations at Heyhouses, west of the current allocation HSS1 - Queensway, St Annes, to either side of the then proposed, and now built, M55 to Heyhouses Link Road (B5410 Lytham St Annes Way). These are Site H2 - Land West of North	The Local Plan will provide sites for a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land over the plan period to 31 March 2042. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key

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	Houses Lane which was expected to deliver 340 new dwellings (net) and Site H3 - Land North of Moss Hall Lane which was expected to deliver 140 new dwellings (net) as shown on the Preferred Options Policies Map (see extract below) - available at p.2 https://fyldegovuk.sharepoint.com/:b:/s/planningcommon/IQCqdOBac5K3Toc_YuvanzcdAbUJ-jS4CWpghf_Ef9KZADw?e=edaPKv Both of these sites, together with additional land to the north of Site H3 up to the line of the Moss Sluice watercourse (added in blue to the map extract on the previous page), should be included in the new Local Plan as part of the St Annes Strategic Location for Development, and they have been submitted in response to the June 2025 Call for Sites for inclusion in the SHELAA evidence base. Site H2 has been submitted to the Call for Sites as 'Land west of Lytham St Annes Way (B5410), Lytham St Annes'. The submission explains that the 16 hectare site is highly-suitable, achievable and available for housing-led development. It benefits from a dedicated junction onto Lytham St Annes Way with capacity to serve at least 500 dwellings and a local centre as agreed in a Memorandum of Understanding with Lancashire County Council, and is subject to the current outline planning application 16/1025 for 550 dwellings and a local centre. A pre-application enquiry (ENQ/23/0039) has also been submitted which includes an updated masterplan for the site and demonstrates that it can deliver a wider mix or more beneficial uses comprising: - Approximately 150 dwellings (@ 30dph) market and affordable housing and meeting housing mix and public open space policy requirements - Approximately 120 units (@ 30 dph) mixed residential including market housing, retirement apartments and extra care/residential care - A local centre including a food store/s up to 3,000 sqm, in line with the combined convenience retail capacity identified for St Annes and Lytham in the Fylde Health Check and Centres Study of September 2022, 300 sqm ancillary retail, food and drink outlet/s and/or drive-thru unit/s and, potentially, a 300 sqm primary care centre and 200 sqm children's nursery Site H3, and land to the north, has been submitted to the Call for Sites in two parts as 'Land east of Lytham St Annes Way (B5410), Lytham St Annes' and 'Land north of Linnet Lane, Lytham St Annes'. The submissions explain that the respective 33 hectare and 6 hectare	Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the widest range of available facilities. All four locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan. All sites submitted have been assessed based on suitability, accessibility and achievability.

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	sites benefit from a dedicated junction onto Lytham St Annes Way with capacity to serve at least 500 dwellings (or equivalent alternative development) as agreed in a Memorandum of Understanding with Lancashire County Council, and are highly-suitable, achievable and available to meet a mix of development needs including housing, commercial uses (food store, ancillary retail / food and drink / drive-thru units), employment, leisure / health and fitness, infrastructure (data centres) and renewable energy (PV solar farm) and energy-related (battery storage) development. Our client also owns two separate parcels of land further east on the western side of Ballam Road, one is outside and the other is within the boundary of the Lytham Hall Registered Park and Garden of Special Historic Interest, and which may also have potential for housing development.	
Steven Abbott Associates for Bradkirk Business Park	Yes. This the most sustainable and sensible approach.	Comments noted.
Turley for Strategic Land Group	1.20 A major issue to be determined at Regulation 18 stage is the overall development strategy, in other words the main locations where development will be located and the balance between those locations. A common approach is to provide a series of preidentified spatial options, each of which identifies a percentage of development at each location. This approach was used for the existing Local Plan: however, the final version of the Local Plan took forward an approach that had not been offered in any of the options. Therefore, the ISDV recognises at this early stage in the process, the Council are looking for stakeholders to help form the approach. 1.21 Therefore, the consultation has been framed to allow consideration of the current strategy, a variant version of the current strategy, and an entirely open option. 1.22 Any Local Plan should seek to deliver a sustainable pattern of development. The current Local Plan identifies four SDLs for development which absorb the majority (90%) of new housing development. In short, the SDLs have served the Borough well with development being delivered across a multitude of sites including larger scale	The Council acknowledges this. The Local Plan will provide sites for a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land over the plan period to 31 March 2042. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of

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	allocations. 1.23 Given the investment already made in these strategic locations and existing commitments, it is SLG's view that the four SDLs should remain as the focus of the development strategy for the new Local Plan. However, given the degree of constraints of certain settlements such as St Annes on Sea, Lytham, Ansdell and Fairhaven and Kirkham and Wesham within certain strategic locations, SLG consider that the Whitehills and Whyndyke SDL has significant potential to accommodate more housing development in order for the area to become a self-sufficient location for work, living and play. 1.24 The Whitehills and Whyndyke SDL is of sub regional importance in economic terms. A multitude of large, medium and small-scale business exist within the area covering a wide range of industries such as aerospace, nuclear and manufacturing. It remains a very active and popular location for transactions and has seen extensive development activity over the last decade. . Key employers include the Department of Work and Pensions, located at Peel Park, in close proximity to Junction 4 of the M55. Demand remains high for office, industrial, trade and warehouse units. 1.25 Over 50% of realistic employment supply⁴ exists at Whitehills. It also becoming an attractive location for new forms of businesses such as a data centres, reflective of investments in digital infrastructure⁶ being made in the area. Whitehills will therefore remain an important economic growth area in the future and the delivery of further homes, alongside the necessary supporting infrastructure, will ensure that the area become a sustainable proposition and a self-sustaining community. 1.26 Whitehills also has great connections with Blackpool in terms of character and geographical location, including proximity to the employment areas at Whitehills and around Blackpool Airport and the Enterprise Zone⁷ which offers opportunities in advanced manufacturing, renewable energy research and development, data and digital and professional services with 2,500 jobs already created. 1.27 The Whitehills and Whyndyke SDL does not suffer from significant constraints. It is well located to the local and strategic road networks, free from flood risk and does not	employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the

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	include any designations such as Green Belt or is affected by international or national designations that constrain other SDLs.	widest range of available facilities. Whitehills and Whyndyke form extensions to the adjoining settlement of Blackpool, which is the largest settlement in the Fylde Coast sub-region and has the widest range of facilities: the areas are developing two new Local Service Centres which will ensure that local facilities are provided, as well as enabling access to the widest range in Blackpool. Warton is home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting and therefore represent sustainable growth. Kirkham and Wesham have good access by sustainable public transport via its railway station to the wider sub-region and the North West as a whole; Kirkham is a market town with a historic town centre that has been subject to recent improvement and investment, which is capable of supporting a larger population than it currently does; the settlements are the locations for manufacturing employment which is being currently expanded. Accordingly all four locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan.

Respondent name	(8) Do you support Option 1? Please give any comments you wish to make on this option.	Council Response
		Please refer to Strategic Policy DST1: The Development Strategy for further information.
United Utilities	In consideration of the Development Strategy Options, UUW wishes to note the following key points. It is important that the Development Strategy recognises that smaller settlements are often supported by infrastructure which is proportionate to their size, often in rural locations. UUW wishes to highlight that disproportionate growth in any settlement, especially small settlements, has the potential to place a strain on existing water and wastewater infrastructure. Therefore, when considering your spatial strategy options, we recommend that any strategy which you bring forward delivers growth that is proportionate to the size of each settlement. UUW is supportive of an approach which seeks to maximise the amount of development on previously developed land. That said, UUW believes that significant value can be added to the planning system by ensuring that all sites are identified as site-specific allocations wherever possible. UUW believes that a site-specific allocation has added benefit as it allows us to undertake early site-specific assessment to identify any key constraints and risks, for example, an on-site flood risk or a known infrastructure constraint.	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. Please refer to Strategic Policy DST1: The Development Strategy for further information. When assessing sites as part of the SHELAA factors such as flood risk was measured and used to consider if a site was suitable, accessible, and achievable.

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		Please refer to Non-strategic Policy IFR2: Developer Contributions, Strategic Policy DSA1: Achieving Good Design in Development, Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency, Strategic Policy CCH2: Surface Water Run-Off and Sustainable Drainage for further information.
Woodland Trust	The Woodland Trust is aware of the presence of ancient woodland at Lytham Hall Park, along with associated veteran trees that contribute greatly to the area's historic and ecological value. While we recognise the need for sustainable development within Fylde, we would not support any option that could lead to direct loss of, or damage to, ancient woodland or veteran trees, as these are irreplaceable habitats. Ancient woodland represents a unique and complex ecosystem developed over centuries, and its loss cannot be compensated for by new planting. Should Option 1 involve development in proximity to Lytham Hall Park, it is essential that ancient woodland and all veteran trees are fully protected, any potential indirect impacts, such as changes in drainage, light levels, recreational pressure, or pollution, are carefully assessed and minimised and long-term management and protection measures are put in place to ensure the continued health of these habitats.	The council acknowledges that Fylde has over 200 Listed Buildings in total, including one Grade 1 Listing, Lytham Hall. Some of the most significant heritage assets in Fylde are the three Registered Parks and Gardens, which are Lytham Hall Park, Promenade Gardens, St Annes and Ashton Gardens, St Annes. These assets of significant scale are dependent on ongoing programmes of restoration and maintenance at significant cost. The plan will ensure a presumption in favour of the retention of buildings and / or features which make a positive contribution to the special character and appearance of a conservation area. Demolition, or other substantial loss or harm to the significance of a building or feature - including trees, landscapes, spaces (public or private open space) and artefacts – that make a positive contribution to the Conservation Area, will

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		only be permitted where this harm is outweighed by the public benefits of the proposal. Such proposals must be accompanied by clear details of the proposal and justify the harm in line with national policy. Strategic Policy ENT1: Historic Environment will ensure that proposals for development should conserve, protect and, where appropriate, enhance the character, appearance, significance and historic value of Fylde's designated and undesignated heritage assets, including the formal resort of Lytham with the Windmill and Green, and the cultural assets based around Lowther Pavilion and Garden, Lytham Hall and its historic parkland. Proposals that result in harm to the significance of a Registered Historic Park and Garden or its setting will not be permitted. Proposals affecting any of the following three Registered Historic Parks and Gardens or newly designated Historic Parks and Gardens: - Ashton Gardens, St Annes - Promenade Gardens, St Annes - Lytham Hall Park, Lytham.

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		Please refer to Strategic Policy ENT1: Historic Environment for further information.

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
Alban Cassidy	No, for the reasons given above.	In order to make best use of the existing strategy it is essential that no limit is place dupon exploring development options that confirm to the locational criteria. The consented site at Whyndyke is moving forward and there are opportunities to create new allocations north of Lytham St Annes but Kirkham is artifically constrained by green belt land to the south which serves no role in terms of the purpose of green belts and undermines sustainable develoment as it results in development being located on peripheral sites further from the central core of Kirkham where the majority of facilities are located.		Comments noted. The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive

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				local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics.
Anna Briggs			I'm not sure where to insert these issues as the categories you have used are wide so I'll copy them here and there: -aesthetics: harmonizing store fronts would help keep a certain level of charm. For example in St Annes, some shops just look dire and others beautiful. Maybe unified coloured awnings, plants hanging etc could make a more harmonious effect like in Lytham.	Response previously addressed.

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			More regular scrubbing of the rain protection kiosks and benches would be good as they often get covered in guano. The blue metal structures in St Annes could do well all being painted dark green or brick colour or brown to harmonize with the Victorian brick colour. -young people bullying, anti-social behaviour, poor mental health: young people often seem hopeless, with issues such as misogynistic behaviour, bullying, depression, vaping addiction, teen pregnancy, body image issues, not wearing bike helmets, and little to do. It is an older population but there truly are too few non-school fun spaces for young people to enjoy in all of Fylde. More CCTV for example in Ashton Gardens and on the beach would help curb anti-social behaviour perhaps. -I would appreciate the monthly market to be weekly, to be able to	

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			buy most of my fresh food from local producers and not supermarkets. -pollution on the beaches is INSANE and should not be left to volunteers to take care of. Many jobs could be created to fine and surveil and clean the beaches, as well as educating tourists about pollution. -water quality: I have lived here for a few years and the water has never been sufficient free from sewage to swim in. This is a major drawback to the local community's wellbeing and to tourism. -recycling should be enforced like in Germany. In all the workplaces I've had, no staff member recycled anything and management didn't care. -many roles locally are in elder care, this is my sector. This is a sector with a huge amount of	

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			managerial bullying and exploitation, pressure to not be unionized, ridiculously low pay and pressure to do non-contractual work. The CQC, NHS, unions, council and elder care organizations should be very concerned that our most vulnerable are cared for by understaffed, undertrained, exhausted, undersupported and underpaid people. -lack of knowledge about services: many people here are unaware about what cultural organizations, clubs, churches, libraries, the CAB, volunteering sector, the council etc. has to offer. The social media and newsletters from official channels should highlight these opportunities better. Blackpool council does a very good job at this. -accessibility: too many spaces are inaccessible. As an area with an older and very highly disabled	

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			population (the same for our tourists who are often older and disabled), Fylde could be a global model for smart accessible options for all to enjoy the beach, trains, buses, cafes etc. Why should disabled people wait until 9.30am to use their free pass on the bus? Do we not have medical appointments, work, school drop off, shopping to do like anyone else? -hate speech: the local social media is flooded with misinformation, conspiracy and hate speech. It would help for council communication staff to be a part of all local groups and share factual information to avoid this. Again, the Blackpool MP team does a very good job at social media, communication etc. and could be a model here. -renting: there should be an easier way to rent an apartment and avoid having to pay a deposit when on a low salary or benefits.	

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			If not for my relative, I would never have qualified to rent and ended up homeless. Most people can't afford a deposit. -events and art: having an artist in residence programme, who would contribute temporary installations in the squares, cutting-edge events, Q&As with school kids, open air screenings, curated pop-ups etc. would attract a lot of different tourists here and be fun for younger people.	
Bryning with Warton Parish Council	50:50 Yes as this would spread the load of housing across a wider area and demographic. No - more detail needs to be given around this option. Would Warton have a chance to opt out in favour of another location?	Add in additional rural locations. Look at rural development as well as existing urban centres. Stop over development of small communities - Warton has grown to town sized without the benefits a town has to offer.	When looking at housing ... Provide additional council residential housing for the elderly similar to 'Croft Butts' in Freckleton. Ensure a 15-20% of affordable homes are made available in large developments. All new housing should include solar and electric charging as part of the build	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social

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				and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics.

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				Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. The four Strategic Locations for Development include strategic development sites, comprising land for homes, employment, commercial and leisure uses. Development of these sites will help ensure that the Plan's Development Strategy, Vision and Strategic Objectives are achieved in order to accommodate the level of development and growth required within the lifetime of the Local Plan. It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable. It is always preferable for infrastructure to be delivered up-front before the

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				development takes place; however, this is often difficult to achieve, as contributions from development sites towards off-site infrastructure can only reasonably be required once some of the development value has been realised. The Infrastructure Delivery Plan (IDP) and accompanying Infrastructure Delivery Schedule identify the required essential infrastructure – what it comprises and where and when it will be needed, as well as the likely providers and funding sources. Where there is a funding shortfall, developers will be expected to directly provide and / or contribute towards the necessary infrastructure, subject to viability. Specific policies SLD1-SLD5 set out specific requirements for individual sites to provide on-site infrastructure and connectivity to surrounding areas, and particular issues that will need to be addressed on individual sites. However this should not be regarded as an exhaustive list and developers should take advantage of pre-application engagement with

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				infrastructure providers and the Council to understand detailed requirements at the time of preparing an application. Please refer to Strategic Policy DST1: The Development Strategy for further information. Warton is a large village in the south of the Borough to the east of Lytham, separated from it by Green Belt. The dominant feature of the village is its large aerodrome to the south, between the village and the Ribble Estuary, and its associated large, strategically-important aerospace manufacturing plant. The settlement has two primary schools, regular bus services, public houses and a range of commercial facilities; however recent growth has highlighted the need for further facilities. The existing small Local Centre is subject to a current regeneration scheme to improve the public realm and encourage footfall. The large number of people employed at the BAE Systems aerospace works makes the development of further housing in

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				Warton particularly sustainable as it is likely to encourage people to live close to work. Warton is constrained by Green Belt to the west, flood risk zones to the east, and the BAE Systems aerospace works and aerodrome to the south with the estuary beyond. Development sites are therefore principally in the northern part of the settlement, other than small infill opportunities. A number of sites allocated in the existing Local Plan are close to completion: the one site still to deliver significant numbers of dwellings is Warton East (104 more dwellings). Please refer to Non-Strategic Policy SLD3: Warton Strategic Location for Development for further information. (10) Strategic Policy DST2: The Countryside which will be used to protect areas outside settlements which are not identified as Green Belt or Areas of Separation and are therefore Countryside Areas. Please

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				refer to Strategic Policy DST2: The Countryside for further information. The Development Strategy will plan for around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land in Non-strategic Locations. This will comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Small Rural Settlements. Please refer to Strategic Policy DST1: The Development Strategy and Strategic Policy SLD5: Non-Strategic Location for Development for further information. The Council notes that there should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities.

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				Strategic Policy HOU4: Housing for Older People will ensure that residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age. Please refer to the Policy for further information. Strategic Policy HOU3: Affordable Housing will ensure that all market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. Please refer to the Policy for further information. The Council identifies that meeting needs for homes is a key aspect of creating and maintaining sustainable communities, therefore ensuring that

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				all homes are created and encourage sustainability is a priority.
Claire Parker for Blackpool Council	As above	As above	As above	Comments noted.
David Chedd	No.			Comment noted.
Emma Swindells	No. Moving around Fylde eg. Warton to St Annes, the roads are so busy. Warton is at a standstill during rush hour traffic. There isn't enough secondary schools or colleges in the area so a lot of travelling involved.	The council need to catch up with all the housing that's already been built. Need to get the infrastructure sorted to manage the massive increase in population before further areas are built on.		It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable. It is always preferable for infrastructure to be delivered up-front before the development takes place; however, this is often difficult to achieve, as contributions from development sites towards off-site infrastructure can only reasonably be required once some of the development value has been realised. The Infrastructure Delivery Plan (IDP) and accompanying Infrastructure Delivery Schedule identify the required essential infrastructure – what it comprises and where and when it will be

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				needed, as well as the likely providers and funding sources. Where there is a funding shortfall, developers will be expected to directly provide and / or contribute towards the necessary infrastructure, subject to viability. Specific policies SLD1-SLD5 set out specific requirements for individual sites to provide on-site infrastructure and connectivity to surrounding areas, and particular issues that will need to be addressed on individual sites. However this should not be regarded as an exhaustive list and developers should take advantage of pre-application engagement with infrastructure providers and the Council to understand detailed requirements at the time of preparing an application. Please refer to Policies SLD1-SLD5 for further information surrounding why the four locations are identified as sustainable locations for development. Focusing on Warton: the new Local Plan will identify how further development of new commercial

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				uses to support the settlement can be accommodated at sustainable locations; protect and improve existing facilities; locate any new development sites; protect and ensure appropriate development of BAE Systems Warton Aerodrome site and the Enterprise Zone. Focusing on St Annes, the new Local Plan will protect historic assets and character; promote tourism development; provide improvement of the Island and sea wall construction; support continued improvement of the town centre and links to the promenade; provide for housing but where – limited; provide for employment land connected to settlement. Fylde accommodates several schools across the Borough and surrounding areas, particularly within the strategic areas of development – Kirkham, Warton, and St Annes all have schools. There is no school or primary care facility within Whitehills and Whyndyke, however it is intended that Whyndyke becomes as self-

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				sufficient as possible, including convenience retail, public open space and primary school. The plan will provide connectivity for pedestrians and cyclists including schoolchildren from development sites to existing facilities. For example, vehicular access must be from Lytham St Annes Way. Cycle and pedestrian access from the site through the provision of linkages (not for motor vehicles) with Jubilee Way in the south and a connecting public right of way in the north will be required in order to provide access to safe routes towards schools, St Annes Town Centre and the neighbourhood centre on Heyhouses Lane. The plan will provide infrastructure and transport policies to provide for a wide range of supporting service provision including transport: footways, cycleways, highways, airports, railways, tramways, bus stops, bridleways, coach parking and park and ride. Please refer to Strategic Policy IFR1: Service Accessibility and

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				Infrastructure, , Non-Strategic Policy IFR4 Transport Infrastructure Projects, Strategic Policy IFR5 Enhancing Sustainable Transport Choice for further information. As well as planning for new homes, the Development Strategy will plan to provide employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. Please refer to Strategic Policy DST1: The Development Strategy for further information. The plan will also include several infrastructure and transport policies to ensure the provision and delivery of local services and infrastructure are sustainably delivered. Policies will include: Strategic Policy IFR1: Service Accessibility and Infrastructure, Non-strategic Policy IFR2: Developer Contributions, Strategic Policy IFR3: Protection of Strategic National

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				Infrastructure, Non-Strategic Policy IFR4: Transport Infrastructure Projects, Strategic Policy IFR5: Enhancing Sustainable Transport Choice, Non-Strategic Policy IFR6 Parking provision. Please refer to policies for further information.
Ethan Ellison	Yes	There's potential throughout the borough for smaller scale strategic housing sites with the squaring off of existing settlements, being more sustainable in the long-term, without unduly growing existing sites, which already are being delivered behind schedule.		Comment noted. The Local Plan will focus development on the most sustainable locations and in so doing will allocate a range of sites. However, the scale of growth required will entail the allocation of housing sites of a significant scale. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period.

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				Please refer to Strategic Policy DST1: The Development Strategy for further information.
Frank Andrews	What is option 2??			Option 2 was explained alongside the question.
Gerard Malone	No			Comment noted.
Hannah Dell'Armi	yes assuming that the 5th option would be somewhere sustainable			The overall strategy for directing where new development and investment will involve a consideration of sustainability in accordance with national planning policy.
Haydn Payne (on behalf of the Caravan and Motorhome Club)	No	None	N/A	Comments noted.
John Leadbeater	This may be worth exploring. The creation of additional strategic location(s) may reduce the			Comment noted.

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	load on areas such as Warton eg. there may be scope to examine the Preston boundary option.			
Keith McKay	Not the favourite at present.			Comment noted.
Linda Nulty	Yes I support this option - combined with the existing commitments. The Green belt around Freckleton should be re-assessed, as should Blackpool airport land. More building towards the Preston boundary as Junction 2 is now in place. Whyndyke and Whitehills needs priority. Kirkham and Wesham does NOT need more development as this is now simply to serve people driving out of the towns for work and activity down the Motorway.	sorry comments in previous box	As above	The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy DST1: The Development Strategy for further information regarding the development strategy will be taken

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				forward and the reasoning behind this. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in

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				the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information. Blackpool Airport is no longer used by commercial airlines for public flights, the airport still acts as a base for private aviators and helicopter services to offshore installations. Land and buildings around the airport site, both in Fylde and Blackpool, have been designated as an enterprise zone to further promote economic development in the area. Fylde Council supports the sustainable development of Blackpool Airport, including working to explore the potential to develop commercial aeronautical activity and to relocate operational buildings and

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				facilities closer to the main runway, in the areas outside the greenbelt, unless there are overriding operational requirements that constitute very special circumstances and which justify development in the Green Belt. Please refer to Strategic Policy ECD3: Blackpool Airport and Enterprise Zone for further information.
Marcus Dowling	Yes			Comment noted.
Mrs B Wildish	Basically yes, - the eastern side of Fylde should be sympathetically developed.	The Fylde is very different from Preston and should not be allowed to be swallowed up by it. There is a need for the Fylde sites indicated grow with affordable housing/ shops/ public toilets and car parks		Comments noted. The Development Strategy will aim to achieve development in the most sustainable way to protect and enhance Fylde's historic, environmental, social and economic assets. Please refer to Strategic Policy DST1: The Development Strategy for further information. The Plan will implement several housing policies to ensure there is a variety of house types, particularly in

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				terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. This includes affordable housing. Strategic Policy HOU3: Affordable Housing will state that affordable housing will be assessed and planned for where a need is identified, as part of the broader planning for the housing needs of different groups. Please refer to the policy for further information. The Plan will implement several infrastructure and transport policies to deliver sustainable local services and infrastructure, including car parks. Please refer to Non-Strategic Policy IFR6: Parking provision for further information.
Philip Bickerstaff	No			Comment noted.

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Stephen and Jacqueline Croft	Following broadly Option 1 with some flexibility seems sensible. It really all comes down to the sensitivity/balance/criteria ...	For example, not marked on the map is the area to the East of Freckleton on the A584 towards Clifton which seems close to road links and might make a suitable development site for business and housing - so having the flexibility to explore sites like this in an on-going planning cycle seems reasonable.		Comment noted. The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive

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				local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. As a result, the Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development

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				(over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the widest range of available facilities. Whitehills and Whyndyke form extensions to the adjoining

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				settlement of Blackpool, which is the largest settlement in the Fylde Coast sub-region and has the widest range of facilities: the areas are developing two new Local Service Centres which will ensure that local facilities are provided, as well as enabling access to the widest range in Blackpool. Warton is home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting and therefore represent sustainable growth. Kirkham and Wesham have good access by sustainable public transport via its railway station to the wider sub-region and the North West as a whole; Kirkham is a market town with a historic town centre that has been subject to recent improvement and investment, which is capable of supporting a larger population than it currently does; the settlements are the locations for manufacturing employment which is being currently expanded. Accordingly all four

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				locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan. The Council notes that Freckleton has a good range of facilities including two primary schools, doctors' surgery, public library, pubs and a range of shops. However there are very limited employment areas, meaning that Freckleton largely has a dormitory function. However, the BAE works at Warton is within easy walking/ cycling distance of the main part of the village. Although Freckleton has a bus service connecting with Lytham, St Annes and Preston, it has no railway station and is distant from the nearest one, meaning that access to places outside the local area are much more likely to be made by car than is the case in more sustainable areas. The distances from the village to Lytham and Kirkham are too long for the casual cyclist, meaning that cycling as an active travel option to the local

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				town centres is much less likely to be taken up. Freckleton has not been taken forward as a strategic location in the previous Local Plan, mainly due to the green belt constraint. The green belt remains a constraint to development. Clifton is a rural area within the Fylde borough and is identified as being sufficiently sustainable to support a level of growth necessary to maintain the existing facilities. Much of the rural area is sparsely populated and with community facilities and services largely absent. It is therefore of critical importance to ensure those facilities that exist are protected. There is development pressure for the enlargement of rural villages beyond the level of development needed to support existing facilities. This would then put pressure on existing facilities and lead to a need for additional facilities normally found in towns.

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				The emerging Local Plan will ensure that the character of villages and heritage assets is protected and ensure that land lost to development is through the development strategy, within sustainable locations.
Steven Abbott	No. This would be less sustainable and adverse to the need to protect the existing towns including their town centres and community assets.			Comment noted.
Asteer Planning for Applethwaite			3.11 Applethwaite consider that a new Development Strategy should pursue balanced spatial growth across the Borough, that ensure a level of growth across the Borough's sustainable settlements, rather than seeking to focus growth on the key service centres only, or on the periphery of the Borough in locations where growth may not support the vitality of Fylde Borough or its wide range of villages and settlements. 3.12	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular,

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			Applethwaite considers that it is critical for the spatial portrait of Fylde to consider the importance of enabling sensitive, logical and appropriate extensions to Tier 1 Larger Rural Settlements to support their sustainability and meet the needs of local communities. Housing growth is essential to the vitality and vibrancy of these settlements, and ensuring an appropriate level of growth will support housing choice and provide housing for future generations. 3.13 Whichever spatial option is pursued, Applethwaite consider the site to represent the most suitable option for growth in Newton-with-Scales, in terms of its scale, location and the opportunity to logically and sensitively extend the existing settlement.	choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics.

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				The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the

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				Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is

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				reduced pressure for development at non-strategic locations. The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the widest range of available facilities. Whitehills and Whyndyke form extensions to the adjoining settlement of Blackpool, which is the largest settlement in the Fylde Coast sub-region and has the widest range of facilities: the areas are developing two new Local Service Centres which will ensure that local facilities are provided, as well as enabling access to the widest range in Blackpool. Warton is home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting and therefore represent sustainable growth. Kirkham and Wesham have good access by

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				sustainable public transport via its railway station to the wider sub-region and the North West as a whole; Kirkham is a market town with a historic town centre that has been subject to recent improvement and investment, which is capable of supporting a larger population than it currently does; the settlements are the locations for manufacturing employment which is being currently expanded. Accordingly all four locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan. Please refer to Strategic Policy DST1: The Development Strategy for further information. The Area of Separation has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary.

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				The policy seeks to restrict development to a greater degree than the countryside policy (see below) in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information.
Emery Planning for Persimmon & Charles Church			4.4 For these representations, Kirkham and Wesham is our focus. For Kirkham, the Issues for the Local Plan are set out in the consultation draft as follows: • Maintaining the recovery of Kirkham Town Centre; • Identifying new sites for the next period; • Providing connectivity for pedestrians and cyclists including schoolchildren from development sites to existing facilities including the town centre. • Maintaining sufficient bus services in support of	The listed points will be carried forward into the emerging plan and be a key focus. Kirkham and Wesham will continue to be a strategic location for development, alongside St Annes (including Squires Gate); Whitehills and Whyndyke; and Warton. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development.

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			development sites away from the town centre. 4.5 As one of the three Key Service Centres, Kirkham should continue to provide range of housing and employment opportunities through the allocation of land.	
Historic England	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring	No comment at present.		The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating

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	that the local plan meets the tests of soundness during EIP			homes and businesses in close proximity will reduce the need to travel. Please refer to Strategic Policy DST1: The Development Strategy for further information. The Local Plan will implement several policies that protect environments and assets policies – in particular Strategic Policy ENT1: Historic Environment will ensure that proposals for development conserve, protect and, where appropriate, enhance the character, appearance, significance and historic value of Fylde’s designated and undesignated heritage assets. Please see policy for further information.
Home Builders Federation			Development Strategy Options 13.The consultation draft of the plan puts forward three options for a Development Strategy for the Borough. These are. •Option 1 - Retaining the Existing Development Strategy with	Strategic Policy HOU1: Housing Requirement and Supply highlights that the Local Plan will provide, through allocated sites in this local plan and for windfall sites, (together with sites already committed) for the delivery of a minimum of 6,656 net

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			Updates (based on the four strategic locations in the existing Local Plan). •Option 2 – Variant on the Existing Development Strategy. •Option 3 – Entirely New Development Strategy. 14.Whilst it is noted that Questions 8 – 16 asks for specific views on each option, the HBF considers that it is important that the Development Strategy allows for the delivery of sufficient homes to meet the local housing needs, across a range of housing types and in a variety of locations. This should include land for larger strategic allocations as well as smaller land parcels for small and medium sized house builders. 15.Within the consultation document, the Council refers to the Green Belt as a constraint which may affect the Development Strategy for the area. The HBF would remind the Council that the NPPF states that	additional homes in the period 1st April 2026 to 31st March 2042. The Council will monitor the delivery of housing and planning permissions granted to ensure that it maintains a five-year housing land supply based on the annual housing requirement of 416 net dwellings per annum over the plan period. Please refer to the Policy for further information. Strategic Policy HOU2: Density and Mix of Housing identifies that a broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. Please refer to the Policy for further information. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable,

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			Green Belt boundaries can only be altered in exceptional circumstances, but crucially that exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes (paragraphs 145 and 146). 16. Therefore, if local housing needs in specific locations in the Borough can only be met by Green Belt release, then the Council should consider this as an exceptional circumstance. 17. The HBF also notes that there are a number of allocations in the existing plan which have not yet been developed. The HBF considers that if these are to be 'rolled forward' to the new Local Plan, the Council will need to understand why these sites have not yet come forward and ensure that any issues identified can then be addressed in the new Local Plan so that these sites can be delivered.	available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally

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			18.The Development Strategy also appears in places to discount settlements for future growth on the basis that strategic allocations have already been built out (eg. paragraph 3.10). The HBF wishes to highlight that this plan will be covering a new plan period and the Development Strategy will need to be informed by housing needs over that new plan period, rather than being informed by what has taken place over a previous plan period.	brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required. Please refer to Strategic Policy DST3: Green Belt for further information. The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help

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				mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. • The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular

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				recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). • The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); •

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				Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy DST1: The Development Strategy for further information.
National Highways	Q9. It is difficult to provide a response in terms of whether this approach is supported or not without sight of or knowledge of any transport evidence developed to inform the selections of these locations for strategic growth.	Q10. WSP recommend 'no comment' to this question at this stage.	Q11. Any new strategic location, particularly those near the Borough boundaries with Preston (M55 Junction 1 proximity) or Poulton-le-Fylde (near Junction 3) should be subject to detailed transport impact assessments. Cross-boundary coordination with neighbouring authorities should be prioritised to ensure infrastructure delivery aligns with regional movement patterns and avoids placing unplanned pressure on the SRN. Any proposed changes to the strategic locations should be evaluated against the principles of DfT Circular 01/2022, including cumulative impact assessment and sustainable access.	Comments noted. Specific policies SLD1-SLD5 set out specific requirements for individual sites to provide on-site infrastructure and connectivity to surrounding areas, and particular issues that will need to be addressed on individual sites. However this should not be regarded as an exhaustive list and developers should take advantage of pre-application engagement with infrastructure providers and the Council to understand detailed requirements at the time of preparing an application. Please refer to policies SLD1-SLD5 for further information. The Plan will implement several infrastructure and transport policies to provide and delivery local services and infrastructure including transport: footways, cycleways,

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				highways, airports, railways, tramways, bus stops, bridleways, coach parking and park and ride. Particularly, Strategic Policy IFR1 Service Accessibility and Infrastructure, Non-Strategic Policy IFR4: Transport Infrastructure Projects and Strategic Policy IFR5 Enhancing Sustainable Transport Choice for further information. The Council is having ongoing discussions with National Highways and the local highways authority to ensure local highway network is not negatively impacted by development. The Council will implement several infrastructure and transport policies to ensure development supports transportation including footways, cycleways, highways, airports, railways, tramways, bus stops, bridleways, coach parking and park and ride. Non-Strategic Policy IFR4: Transport Infrastructure Projects will support the A585 and M55 Junction 4. Please

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				refer to Policy for further information. Please also refer to Strategic Policy IFR1: Service Accessibility and Infrastructure and Non-strategic Policy IFR2: Developer Contributions for further information.
Pegasus Group for Rowland Homes		3.7. To provide further support to the Council in selecting an appropriate approach to the Plan, the Planning Inspectorate recently hosted a webinar² entitled 'what is meant by a sustainable location?'. Key points of note include reiterating the fact that walking and cycling are at the top of the sustainable transport hierarchy, followed by public transport. Whilst public transport connectivity/corridors are clearly important, it should not be the sole focus. Instead, the site selection process for each settlement should also heavily focus on a site's location and its		The Council will prioritise sustainably and notes that development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. As a result, the Council will implement several infrastructure and transport policies to ensure that transport, including footways, cycleways, highways, airports, railways, tramways, bus stops, bridleways, coach parking and park and ride are prioritised.

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		pedestrian and cycle connectivity to existing local amenities (shops, schools etc), which all reduce car trips on a day to day basis. Public transport is clearly helpful for longer distance trips but has to be considered alongside the aim to reduce day to day trips to local facilities. 3.8. We highlight the following key points in this respect: • Covid has changed travel patterns, with working from home practices now the norm. Walking and cycling to local amenities is becoming even more important in this context, with less every day reliance on public transport for trips further afield. • The aforementioned PINS webinar highlights that improvements to pedestrian routes is the key/top priority to make meaningful modal shift changes. • The PINS webinar also highlights the importance of		Please refer to Strategic Policy IFR1: Service Accessibility and Infrastructure, Non-Strategic Policy: IFR4 Transport Infrastructure Projects, Strategic Policy IFR5: Enhancing Sustainable Transport Choice for further information. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: • The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development

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		context – high frequency bus routes are not always realistic/feasible in smaller settlements. It is Rowland Homes' view that this alone does not make a development unsustainable – a site's pedestrian and cycle connectivity to local amenities is equally, in fact more, important. • NPPF paragraph 110 also recognises the above – noting that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in the plan-making process. 3.9. In light of the above, and in line with NPPF paragraph 83 which notes how planning policies should identify opportunities for villages to grow, the option to be pursued needs to focus on sustainability in a more holistic manner. Growth should		opportunities. • The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). • The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. The four locations will be St Annes (including Squires Gate); • Whitehills

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		not just be focused near high frequency public transport corridors and railway stations, as was the focus in the current Plan – as this alone will not make meaningful headway in achieving a genuine modal shift to sustainable travel modes. 3.10. Therefore, it is essential that Fylde undertake a thorough review of their settlement hierarchy to ensure that the most sustainable locations are identified and considered in order that they can properly contribute to meeting the full development needs moving forwards. 3.11. What is also important in this respect is flood risk, where the SFRA3 sets out in its Executive Summary that parts of the study area [the three Fylde Coast Authorities] are at risk of flooding from the following sources: fluvial, coastal, surface water, groundwater,		and Whyndyke; • Warton; and • Kirkham and Wesham. The four Strategic Locations for Development include strategic development sites, comprising land for homes, employment, commercial and leisure uses. Development of these sites will help ensure that the Plan's Development Strategy, Vision and Strategic Objectives are achieved in order to accommodate the level of development and growth required within the lifetime of the Local Plan. It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable. It is always preferable for infrastructure to be delivered up-front before the development takes place; however, this is often difficult to achieve, as contributions from development sites towards off-site infrastructure can only reasonably be required once some of the development value has been realised. The Infrastructure Delivery Plan (IDP) and accompanying

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		sewers, reservoir inundation, and overtopping/ breach. The SFRA has shown that the most significant sources of flood risk in the study area are fluvial, tidal, and surface water. Therefore, the sequential approach to allocations will need to be carefully considered as the Plan progresses, certainly as many areas of the Fylde Coast are constrained by flood risk issues.		Infrastructure Delivery Schedule identify the required essential infrastructure – what it comprises and where and when it will be needed, as well as the likely providers and funding sources. Where there is a funding shortfall, developers will be expected to directly provide and / or contribute towards the necessary infrastructure, subject to viability. Specific policies SLD1-SLD5 set out specific requirements for individual sites to provide on-site infrastructure and connectivity to surrounding areas, and particular issues that will need to be addressed on individual sites. However this should not be regarded as an exhaustive list and developers should take advantage of pre-application engagement with infrastructure providers and the Council to understand detailed requirements at the time of preparing an application. Please refer to policies SLD1-SLD5 for further information.

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PWA Planning for Dixon Grange The Villa	4.3. Dixon Grange therefore advocates for Option 2: a variant on the existing development strategy. However, the 'variation' required is fundamental, settlement boundaries must be reviewed, and sites such as The Villa that already function as part of the settlement and clear urban features should be included. This will not only support the Vision and Development Strategy, it will also support existing successful businesses that are part and parcel of adjacent settlements, such as The Villa.	Dixon Grange supports a modified strategy under Option 2, but one that represents a fundamental shift away from place-based restrictions towards a criteria-based assessment of sustainability. 4.7. The primary test for any proposed site should be its contribution to sustainable development, not its relationship to a line on a map. This approach would allow the Council to properly assess the merits of sites sustainable sites, such as The Villa.	4.8. A sound development strategy must be flexible enough to recognise and allocate such sustainable sites. We therefore advocate for a strategy that removes settlement boundaries or as a minimum amends them based on how a settlement functions (along with the development needs of the authority) and the overly restrictive 'Open Countryside' designation. This would allow all sites to be judged on their individual merits against clear sustainability criteria derived from the NPPF.	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive

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				local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the

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				Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18

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				Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular

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				recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). - The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. Outside of the main towns and large villages, the Borough is a sparsely populated agricultural area. Within this area, seven of the villages are identified in the existing Local Plan as being sufficiently sustainable to support a level of growth necessary to maintain the existing facilities. These are: Staining, Newton, Wrea Green, Clifton, Weeton, Elswick and Singleton. Beyond these, there exists a number of small hamlets and small

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				collections of houses, and dispersed farms as typical for Lancashire. Wrea Green is identified as a Tier 1 Larger Rural Settlement therefore is a non-strategic for development. Please refer to Strategic Policy DST1: The Development Strategy for further information regarding the development strategy and why this structure will be taken forward. Boundaries for the settlements listed in the settlement hierarchy have been identified and are shown on the Policies map. The boundaries have been drawn to include all Local Plan allocations. Please refer to Strategic Policy DST2: Settlement Boundaries for further information. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of

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				Separation in response to concerns that there was potential for settlements to merge without further protection. There is a narrow strip of land between the settlement boundaries of Wrea Green and Kirkham, measuring 313 metres at its narrowest point, which is recognised as an area valued locally as part of the Green Infrastructure network. Similarly, there is a narrow strip of land between Newton and Kirkham. In both cases, it has been demonstrated in the Area of Separation Background Paper that, having considered each area against the criteria, there is potential for the gap between settlements to be compromised, which without protection would over time lead to the progressive coalescence of settlements leading to a loss of distinct identity. Consequently, the policy identifies two Areas of Separation, one between Wrea Green and Kirkham and the other between Kirkham and Newton. The policy has

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				been reviewed for the new Local Plan. Please refer to Strategic Policy DST4: Areas of Separation for further information. Please refer to the above response regarding the Councils priority towards sustainable development and identifying sustainable sites and locations. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable to ensure all sites are deliverable. Strategic Policy DST5: The Countryside will be implemented into the emerging Local Plan. The principle is to seek to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. Please refer to the Policy for further information.
PWA Planning for Medicom	4.3. We therefore advocate for Option 2: a	We support a modified strategy under Option 2. The	The PPG explicitly expects authorities to conduct a Green	The overall strategy for directing where new development and

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	variant on the existing development strategy. However, the 'variation' required is fundamental. The new plan must incorporate a full, evidence-led review of the Green Belt to identify sustainable, previously developed sites for release, such as the land at School Farm, Warton.	fundamental variation required is the commitment to undertake a comprehensive Green Belt review, consistent with the NPPF and the latest Planning Practice Guidance (PPG). 4.7. This review must be the mechanism through which the Council identifies less sensitive parcels of Green Belt land that can be released to meet development needs sustainably.	Belt Assessment to identify "grey belt" land—previously developed land or other land that does not strongly contribute to Green Belt purposes. 4.8. School Farm is a prime candidate for identification as a sustainable "Grey Belt" site. It is previously developed land, containing substantial hardstanding from its former military use and a range of farm buildings. Crucially, it is located immediately adjacent to the sustainable settlement and major employment hub of Warton. 4.9. Prioritising the release of a sustainable, previously developed 'Grey Belt' site like School Farm over less accessible, greenfield sites in the open countryside represents a more sustainable pattern of development and makes more effective use of land. This is the logical, evidence-led, and NPPF-	investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate

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			compliant strategy that the Council should pursue.	development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four

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				strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no

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				development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the

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				location has been renamed St. Annes (including Squires Gate). - The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. Please refer to Strategic Policy DST1: The Development Strategy for further information regarding the development strategy and why this structure will be taken forward. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable,

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				available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally

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				brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required. Please refer to Strategic Policy DST3: Green Belt for further information. As stated in the above response, as the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this

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				element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional

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				circumstances exist to justify a strategic review of the Green Belt in Fylde. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required.

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				Please refer to Strategic Policy DST3: Green Belt for further information. Strategic Policy DST5: The Countryside seeks to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. Please refer to the Policy for further information.
PWA Planning for Pringle Homes	4.3. Pringle Homes therefore advocates for Option 2: a variant on the existing development strategy. However, the 'variation' required is fundamental. The new plan must move away from the arbitrary geographical constraints of the current strategy towards a more flexible, criteria-based approach that properly assesses sites on their individual sustainability merits. 4.6.	4.7. The primary test for any proposed site should be its contribution to sustainable development, not its relationship to a line on a map. This approach would allow the Council to properly assess the merits of sites like Greenlands Farm. As detailed in our Call for Sites submission, the site represents an exceptionally sustainable location for growth: • It is located on the edge of Wrea Green, a Tier 1 Larger Rural Settlement with a comprehensive range of local	A sound development strategy must be flexible enough to recognise and allocate such sustainable sites. We therefore advocate for a strategy that removes settlement boundaries and the overly restrictive 'Open Countryside' designation. This would allow all sites to be judged on their individual merits against clear sustainability criteria derived from the NPPF.	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate

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	Pringle Homes supports a modified strategy under Option 2, but one that represents a fundamental shift away from place-based restrictions towards a criteria-based assessment of sustainability.	amenities, including a primary school, shops, and community facilities. • It has excellent access to public transport, with bus stops just 200m away providing regular connections to Preston, Blackpool, and Lytham St Annes. • It would deliver a mix of family, affordable, and accessible homes, enabling local people to remain within their community and supporting the village's long-term vitality. • It presents an opportunity to deliver a significant environmental enhancement through the redevelopment of the derelict and unsafe former piggery buildings, removing a blight on the landscape.		change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different

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				development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development

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				strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham

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				no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). - The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction.

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				Please refer to Strategic Policy DST1: The Development Strategy for further information regarding the development strategy and why this structure will be taken forward. The four Strategic Locations for Development include strategic development sites, comprising land for homes, employment, commercial and leisure uses. Development of these sites will help ensure that the Plan's Development Strategy, Vision and Strategic Objectives are achieved in order to accommodate the level of development and growth required within the lifetime of the Local Plan. It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable. It is always preferable for infrastructure to be delivered up-front before the development takes place; however, this is often difficult to achieve, as contributions from development sites towards off-site infrastructure can only reasonably be required once

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				some of the development value has been realised. The Infrastructure Delivery Plan (IDP) and accompanying Infrastructure Delivery Schedule identify the required essential infrastructure – what it comprises and where and when it will be needed, as well as the likely providers and funding sources. Where there is a funding shortfall, developers will be expected to directly provide and / or contribute towards the necessary infrastructure, subject to viability. Specific policies SLD1-SLD5 set out specific requirements for individual sites to provide on-site infrastructure and connectivity to surrounding areas, and particular issues that will need to be addressed on individual sites. However this should not be regarded as an exhaustive list and developers should take advantage of pre-application engagement with infrastructure providers and the Council to understand detailed requirements at the time of preparing an application.

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				(including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Each site that was submitted was assessed as part of the SHELAA The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable to ensure sites are deliverable.

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				Strategic Policy DST2: Settlement Boundaries will ensure that development proposals on sites within settlement boundaries will be assessed against all relevant Local Plan policies. Please refer to the Policy for further information. Strategic Policy DST5: The Countryside seeks to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. Please refer to the policy for further information.
PWA Planning for Ribby Hall	3.3. Ribby Hall Village supports a modified strategy under Option 2, but one that represents a fundamental shift away from place-based restrictions towards a criteria-based assessment of sustainability. 3.4. The primary test for any proposed site should be its contribution to	3.5. The fundamental variation required however is the commitment to undertake a comprehensive Green Belt review, consistent with the NPPF and the latest Planning Practice Guidance (PPG). 3.6. This review must be the mechanism through which the Council identifies less sensitive parcels of Green Belt land that can be released to meet		The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
	sustainable development, not its relationship to a line on a map. This approach would allow the Council to properly assess the merits of sites and existing and proposed extension allocation of Ribby Hall Village, particularly in the context of the Area of Separation.	development needs sustainably. The PPG explicitly expects authorities to conduct a Green Belt Assessment to identify "grey belt" land—previously developed land or other land that does not strongly contribute to Green Belt purposes. This is the case with the land to the south east of Ribby Hall Village.		Fylde’s historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough’s built and natural environment, including nature

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery:

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). - The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. Please refer to Strategic Policy DST1: The Development Strategy for further information regarding the development strategy and why this structure will be taken forward. All sites that were submitted for the new Local Plan were assessed as part of the SHELAA to identify sufficient sites to meet needs that are suitable, available, and achievable within land that is not designated as Green Belt. In order to help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements, policy DST4 defines Areas of Separation. An Area of Separation is different to Green Belt: it is of a significantly smaller scale and located between settlement boundaries that are relatively close and at risk of merging.

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. There is a narrow strip of land between the settlement boundaries of Wrea Green and Kirkham, measuring 313 metres at its narrowest point, which is recognised as an area valued locally as part of the Green Infrastructure network. Similarly, there is a narrow strip of land between Newton and Kirkham. In both cases, it has been demonstrated in the Area of Separation Background Paper that, having considered each area against the criteria, there is potential for the gap between settlements to be

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				compromised, which without protection would over time lead to the progressive coalescence of settlements leading to a loss of distinct identity. Consequently, the policy identifies two Areas of Separation, one between Wrea Green and Kirkham and the other between Kirkham and Newton. The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area,

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Please refer to Strategic Policy DST4: Areas of Separation and the Council's Area of Separation Background Paper (2014) for further information. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				currently designated as Green Belt is not required.
PWA Planning	4.3. We therefore advocate for Option 2: a variant on the existing development strategy. However, the 'variation' required is fundamental. We propose a move away from the rigid geographical constraints of the current plan towards a more flexible, criteria-based approach that we term a "Sustainability-Led Dispersal Strategy". 4.6. We support a modified strategy under Option 2, but one that represents a fundamental shift in policy and mindset.	Our proposed "Sustainability-Led Dispersal Strategy" would be based on the following principles: • Move from a Place-Based to a Criteria-Based Approach: The focus of the plan should shift from where development can happen (i.e., within one of four locations) to what makes development sustainable. The primary test for any proposed site should be its contribution to sustainable development, assessed against a clear set of criteria derived from the NPPF, rather than its relationship to a line on a map. • Support for Growth in All Sustainable Settlements: The new plan should be positive about growth across the borough. It should allow for the delivery of housing and employment proportionate		The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
		to the size, role, and capacity of all settlements identified in the settlement hierarchy. New development supports the vitality of local services and businesses, and this benefit should not be artificially restricted to just four locations. • Remove Restrictive Designations: To facilitate this, the new plan should remove settlement boundaries and the restrictive 'Open Countryside' designation. These policies, particularly Policy GD4 in the current Local Plan, create a blanket restriction on development and prevent proposals from being judged on their individual merits. Their removal would be a clear signal that the Council is embracing the NPPF's "presumption in favour of sustainable development". Page 12 • Embrace the Planning Balance: In place of these restrictive		considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places.

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
		policies, the Plan should rely on a criteria-based policy that allows for a planning balance to be applied in more instances. A proposal for development should be supported if it represents sustainable development and meets an identified need, unless any adverse impacts would "significantly and demonstrably outweigh the benefits", as per the test in the NPPF. • Protect Only What Genuinely Warrants Protection: This approach does not equate to inappropriate, uncontrolled development. It allows for the robust protection of the borough's most important environmental and heritage assets where significant harm is identified, consistent with the hierarchy of designations set out in the NPPF (e.g., Green Belt, SSSIs, and designated heritage assets). It		The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
		simply removes the arbitrary and blanket restriction applied to all land that happens to fall outside a settlement boundary. 4.7. This modified strategy is more flexible, more responsive, and more consistent with the NPPF. It will enable the market to bring forward a wider range of sites in sustainable locations across the borough, significantly improving the prospect of meeting the housing requirement and passing the government's Housing Delivery Test		provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: - The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. - The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). - The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. Please refer to Strategic Policy DST1: The Development Strategy for further information regarding the development strategy and why this structure will be taken forward. The four Strategic Locations for Development include strategic development sites, comprising land for homes, employment, commercial

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				and leisure uses. Development of these sites will help ensure that the Plan's Development Strategy, Vision and Strategic Objectives are achieved in order to accommodate the level of development and growth required within the lifetime of the Local Plan. It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable. It is always preferable for infrastructure to be delivered up-front before the development takes place; however, this is often difficult to achieve, as contributions from development sites towards off-site infrastructure can only reasonably be required once some of the development value has been realised. The Infrastructure Delivery Plan (IDP) and accompanying Infrastructure Delivery Schedule identify the required essential infrastructure – what it comprises and where and when it will be needed, as well as the likely providers and funding sources. Where there is

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				a funding shortfall, developers will be expected to directly provide and / or contribute towards the necessary infrastructure, subject to viability. Specific policies SLD1-SLD5 set out specific requirements for individual sites to provide on-site infrastructure and connectivity to surrounding areas, and particular issues that will need to be addressed on individual sites. However this should not be regarded as an exhaustive list and developers should take advantage of pre-application engagement with infrastructure providers and the Council to understand detailed requirements at the time of preparing an application. All sites that were submitted for the new Local Plan were assessed as part of the SHELAA to identify sufficient sites to meet needs that are suitable, available, and achievable within land that is not designated as Green Belt. As outlined in the response above, a place based approach will be used within the plan to direct where new development and investment will be

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				(including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. The plan will implement Strategic Policy DST2: Settlement Boundaries to identify boundaries for the settlements listed in the settlement hierarchy have been identified and are shown on the Policies map. The boundaries have been drawn to include all Local Plan allocations. The plan will also implement Strategic Policy DST5: The Countryside. The policy will seek to

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. Please refer to the policy for further information. The emerging plan will include several Protected Environments and Assets Policies. Please refer to: Strategic Policy ENT1: Historic Environment, Non-Strategic Policy ENT2: Local Green Space, Strategic Policy ENT3: Protecting Existing Open Space and Sports Facilities, Strategic Policy ENT4: Provision of New or Enhanced Open Space and Sports Facilities, Strategic Policy ENT5: Loss of Community, Leisure and Cultural Facilities and Services, Strategic Policy ENT6: Protected Coastal and Wetland Assets, Non-Strategic Policy ENT7: Coastal Change Management Areas, Strategic Policy ENT8 Landscape and Non-Strategic Policy ENT9 Natural Assets on Development Sites for further information.

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
Steven Abbott Associates for Bradkirk Business Park	No. This would be less sustainable and adverse to the need to protect the existing towns including their town centres and community assets.			The Council acknowledges these comments. Please refer to Strategic Policy DST1: The Development Strategy for further information regarding the development strategy and why this structure will be taken forward.
United Utilities			Spatial Strategy We request that sustainability is a 'golden thread' running through the local plan strategy. Noting the nature of this consultation, we do not have the information that we require on potential allocations in order to be able to begin to initially assess the potential cumulative impact on our water and wastewater infrastructure in any settlement. We wish to note that smaller settlements are often supported by infrastructure which is proportionate to their size, often in rural locations. UUW wishes to highlight that disproportionate growth in any settlement, especially small settlements, has	Sustainability will be at the forefront of the Development Strategy and development will be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
			the potential to place a strain on existing water and wastewater infrastructure. Therefore, when considering your spatial strategy options, we recommend that any strategy which you bring forward delivers growth that is proportionate to the size of each settlement. With regards to growth in all settlements, UUW requests information on anticipated delivery rates as soon as they become available. We would welcome sight of a housing trajectory in a GIS format. If you are to pursue a new settlement or a major urban extension, this will need careful consideration and a co-ordinated approach to delivery. If this evolves into your preferred strategy, we would welcome early discussion given our experiences in the wider region where a new settlement is being promoted.	development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. Please refer to Strategic Policy DST1: The Development Strategy for further information. Strategic Policy DST5: The Countryside states that development in rural areas must be sensitive to its surroundings, must not have an unacceptable impact on local roads and should offer opportunities to make the location more sustainable. Please refer to Policy for further information. Strategic Policy CCH1 Flood Alleviation, Water Quality and Water Efficiency ensures that development incorporates the most sustainable form of managing surface water in accordance with Policy CCH2: Surface Water Run-Off and Sustainable Drainage.

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
				The Council is working with United Utilities to provide information where available.
Woodland Trust	As above, we would stress that any proposed areas for development must not impinge upon existing woodland. This includes avoiding both direct loss and indirect impacts such as changes to drainage, increased recreational pressure, or encroachment from infrastructure. All development proposals should be informed by up-to-date ecological surveys and should incorporate adequate buffer zones around woodlands. Where possible, opportunities should also be taken to enhance tree cover and connectivity through new			The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. Please refer to Strategic Policy DST1: The Development Strategy for further

Respondent name	(9) Do you support Option 2?	(10) What variations would you make to the existing strategy, if you would take forward this option?	(11) Please give any other comments you wish to make on this option.	Council Response
	native woodland planting that complements and strengthens Fylde's ecological network.			information regarding the development strategy and why this structure will be taken forward. The Council will implement policies that protect certain types of development. These range from extensive areas protected as natural assets, to individual sites protected for heritage importance – and include existing woodland. Please refer to Non-Strategic Policy ENT2: Local Green Space, Strategic Policy ENT8: Landscape, Policy ENT9: Natural Assets on Development Sites for further information. The Plan also aims to increase woodland cover, the Vision: Fylde 2042 will state that, 'Open space will have been provided, woodland cover increased and Fylde's unique offer of Green and Blue Infrastructure will be accessible and contribute to a high quality of life. Biodiversity, including Fylde's Ecological Network, will have been enhanced and protected from inappropriate development.'

Respondent name	(12) Do you support Option 3?	(13) What would your new development strategy be, if you support Option 3?	(14) Where would new development be located under your suggestion for this option?	(15) Please give any other comments you wish to make on this option.	(16) Would you support Green Belt release to secure this option?	Council Response
Alban Cassidy	No for the reasons given above.				Green belt release can be associated with Option 1 to encourage more sustainable patterns of development.	Comments noted. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either

Respondent name	(12) Do you support Option 3?	(13) What would your new development strategy be, if you support Option 3?	(14) Where would new development be located under your suggestion for this option?	(15) Please give any other comments you wish to make on this option.	(16) Would you support Green Belt release to secure this option?	Council Response
						Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.

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Bryning with Warton Parish Council	Yes but would need details of where this new settlement would be located.	ensure new settlement has affordable and traditional housing incl bungalows for elderly/disabled. Must be amenitied ie shops, pharmacy, supermarket, GP services and a school. Open spaces and playground facilities must be central to the settlement with a marked community hub for people to meet and work together etc.	Mill Farm area - Wesham		Only if no compulsory purchases and the settlement has adequate open spaces and play areas.	As stated in the question, Option 3 allows for the existing development strategy to be abandoned. Development could then be focused at any number of locations, which could be narrowly-defined or widely dispersed, and could include entirely new settlements. Sites with existing planning permission could continue to be built out accordingly. The Council does not make specific suggestions for what an entirely new strategy could look like but welcomes submitted ideas. An entirely new strategy would require substantial supporting evidence to ensure suitable infrastructure can be provided for all sites. Strategies involving completely new settlements or expansion of places with few facilities are often harder to make sustainable. The Council would need reasonable

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						certainty that infrastructure such as schools, highways, high-quality public transport, local shops, and other community facilities would be delivered. The Plan will implement several housing policies available in sufficient quantity and of high quality design. Strategic Policy HOU3: Affordable Housing will ensure that all market housing schemes of 10 or more homes will be required to provide 30% affordable housing. Please refer to the policy for further information. Strategic Policy HOU4: Housing for Older People will ensure that residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate

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						older people, which may include bungalows. Please refer to the policy for further information. Strategic Policy ECD7: Town, District, Local and Neighbourhood Centres emphasises that thriving town centres is a key priority for the Council, both for providing services to residents but also to contribute to the attraction of the towns for visitors, as part of the overall tourism offer. Please refer to the policy for further information. Strategic Policy ENT5: Loss of Community, Leisure and Cultural Facilities and Services will provide protection of such facilities in all parts of the Borough. Please refer to the policy for further information. Strategic Policy DSA1 Achieving Good Design in Development will support wider policies to

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						ensure design is of high standard, taking account of the character and appearance of the local area. Please refer to the policy for further information. Mill Farm, Wesham will be recognised in the Local Plan as an existing employment site which includes significant new employment development. Kirkham and Wesham will be one of the four Strategic Locations for development as stated within the Development Strategy. Please see Strategic Policy DST1: The Development Strategy for further information. Kirkham and Wesham represent a sustainable location for development, providing an extensive range of facilities, generally easily reachable from most parts of the settlements. The

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						settlements are considered together as facilities in one are within easy reach of most parts of the other, including the town centre and secondary schools in Kirkham and the railway station in Wesham. Please see Non-Strategic Policy SLD4: Kirkham and Wesham Strategic Location for Development for further information. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that

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						does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde.
Christine Abbott	Yes	A balance must be struck between development needs and the conservation of landscapes, biodiversity, heritage assets, and the character of the community. Emphasis ought to be placed on ensuring that existing vacant homes are utilised. It is frustrating to see new empty 3 or 4 bedroomed homes for sale			Definitely not. Greenbelt, green spaces, agricultural land, woodland should not be utilised under any circumstances.	Comments noted. The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will

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		with new developments earmarked for housing nearby. I do not believe we should be accommodating additional housing areas - over and above the allocated number. This Government just want to see the whole UK full of houses and infrastructure. We don't need to constantly develop. We need to protect and maintain what we have.				help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring

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						that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. Please refer to Strategic Policy HOU1 Housing Requirement and Supply for further information. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a significant degree of support

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						for the overall approach of the existing strategy. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: • The strategic location previously identified as Lytham and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. • The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool

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						Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). • The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. No distinction is made in the existing development strategy as to the relative importance of the four strategic locations, and no benchmark would be set for the number of units at each; rather, sites would be

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						selected on overall merit, whilst maintaining a reasonable balance to the strategy. The updated development strategy takes a slightly more pragmatic approach, recognising where the most sustainable opportunities are, and how other locations present fewer sustainable sites. Please refer to Strategic Policy DST1 The Development Strategy for further information. Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and

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						maintaining sustainable communities. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. Strategic Policy ENT1: Historic Environment will ensure that proposals for development conserve, protect and, where appropriate, enhance the character, appearance, significance and historic value of Fylde's designated and undesignated heritage assets. Please see policy for further information. The SHELAA identifies sufficient sites to meet needs that are suitable, available and

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						achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information.
Claire Parker for Blackpool Council	As above	As above	As above	As above		Comments noted.
David Chedd	No				No	Comments noted. The SHELAA identifies sufficient sites to meet needs that are suitable,

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						available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information.
Emma Swindells		Don't build any more houses!	Nowhere		No	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types,

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						particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the

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						overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. Strategic Policy

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						HOU1: Housing Requirement and Supply for further information. The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating

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						homes and businesses in close proximity will reduce the need to travel. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the

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						four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Local Plan will provide sites for a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land over the plan period to 31 March 2042. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development.

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						The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy DST1 The Development Strategy and Policies SLD1-SLD5 for further information. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the

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						nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information.
Ethan Ellison	Not at this stage, would require a lot of work and detailed analysis. Better to wait for LGR to be complete to then work out more realistic options for a longer-term strategy.					Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be

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						met within neighbouring areas, unless: i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

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						The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible,

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						enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not

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						been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. No distinction is made in the existing development strategy as to the relative importance of the four strategic locations, and no benchmark would be set for the number of units at each; rather, sites would be selected on overall merit, whilst maintaining a reasonable balance to the strategy. The updated

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						development strategy takes a slightly more pragmatic approach, recognising where the most sustainable opportunities are, and how other locations present fewer sustainable sites. In relation to non-strategic locations, development is directed on the basis of the most sustainable pattern of development reflecting the opportunities from sites brought forward, rather than applying benchmarks to individual settlements as were applied previously. Please refer to Strategic Policy DST1: The Development Strategy for further information.
Gerard Malone	Yes	we need to use the new road and develop along that. More behind Richmond point and Cypress point.	See above	we need much much more affordable / starter housing. Too many 4 bedrooms. Need	100% We need the needs of the many met here not the needs or the few nimbys	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development

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		I say this as a resident of Cypress Point. Yes it's green field but it makes logical sense to continue building along that corridor. Otherwise you will be tinkering at the edges		3 beds lots of them.	that can't see past what they already possess.	trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the

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						limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The issue of constraints is particularly important in Fylde. Freckleton is constrained, effectively on all sides: on the east by Freckleton Marsh, entirely in flood zone 3; on the west by Pool Strem and its flood zone, with Warton beyond; to the south by the strategically important runway that is part of the BAE Systems Warton site; to the north by green belt. Lytham is also constrained on all sides. To the east is the estuary including the Ribble Estuary National Nature Reserve, with the remaining area being in a flood risk zone and also green belt. To the

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						north is the Lytham Coastal Changes SSSI, Green Drive Golf Course, and the Lytham Hall Park Registered Park and Garden. To the west, the settlement adjoins Ansdell. To the south is the coastline. No new sites within the urban area have been identified. Therefore, despite being a Key Service Centre, Lytham could not be considered as an option to deliver strategic amounts of growth. Ansdell, between Lytham and St Annes with the coast to the south, adjoins land to the north which is extensive areas of land in flood risk zones, plus the Lytham Hall Registered Park and Garden. Therefore Ansdell is also discounted for strategic growth. There are developed areas adjoining the Borough boundary which adjoin the area of Normoss on the edge

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						of Blackpool and the market town of Poulton-le-Fylde located in Wyre. These areas constrained through green belt protection, with some areas further east constrained by flood risk zones. Therefore, areas in Fylde adjoining the settlements outside the Borough in these locations have not been considered for strategic growth. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not

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						been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. Following refinement in response to the earlier consultation and the Sustainability Appraisal, the Council has decided to take forward a development strategy broadly similar to the existing strategy, with some minor changes: • The strategic location previously identified as Lytham

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						and St Annes to no longer refer to Lytham, as Lytham no longer presents strategic development opportunities. • The areas previously identified as Fylde Blackpool Periphery were in practice two discrete areas: Squires Gate Lane and Blackpool Airport being one and the areas of Whitehills and Whyndyke close to M55 Junction 4 being the other. The new strategy includes Squires Gate Lane and Blackpool Airport as within St Annes (which they are), in particular recognising that those who live in the area are citizens of St Annes: the location has been renamed St. Annes (including Squires Gate). • The second area of the former Fylde Blackpool Periphery has been renamed Whitehills and Whyndyke, to more clearly identify the areas as places (local Service Centres) in their

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						own right, and to recognise that although they form a single contiguous area when mapped, they are physically two separate areas on the ground, divided by the M55 and its junction. The Local Plan will provide sites for a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land over the plan period to 31 March 2042. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development.

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						The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy DST1: The Development Strategy for further information. The Plan will ensure that all development is achieved in the most sustainable way in order to protect and where possible, enhance Fylde's historic, environmental, social and economic assets. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-

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						fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. Please refer to Strategic Policy DST1 The Development Strategy for further information. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its

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						development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems

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						site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Comments noted. Please see above response. Strategic Policy HOU3 Affordable Housing will ensure that all market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. Please see Policy for further information. Strategic Policy HOU2: Density and Mix of Housing will ensure that a broad mix of types and sizes of homes, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and

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						housing requirements of the Borough. Please see Policy for further information. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either

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						Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and

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						economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel.
Hannah Dell'Armi					NO!	Comment noted. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt,

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						no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.
Haydn Payne (on behalf of the Caravan and Motorhome Club)	NO	N/A	N/A	N/A	N/a	Comment noted.
Hilary Ayling	Yes	Reduce the amount of new areas that need to be built on by 1) providing new smaller homes by taking larger	In existing homes.	This would help the young by giving a more affordable first step onto the property ladder as well as the elderly	No	Comments noted. The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It

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		homes / businesses and dividing them up. This would allow people to own more affordable homes and get onto the property ladder or downsize and live in a community. Eg: take struggling/failing guest houses/hotels and convert them into small flats/ HMOs and elderly housing options; or take properties that have failed to sell within a timescale and allow them to be divided up. (Blackpool could also be		who wish to remain active but want to release some of their equity and want to have more of a community around them.		involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local

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		encouraged to do this before coming to build in the Fylde). Incentives could be given to encourage home owners to divide their properties into smaller spaces before selling them. 2) Make it easier to change the use of shops etc that are lying empty to be changed back into homes rather than continuing to be eyesores on the high street. This would work well if they were changed into appropriate homes for the elderly as they would be near				characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on

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		shops without needing transport. 3) Give incentives to builders to take on this conversion work rather than building from scratch.				the balance of development between the different places. The existing Local Plan is based on a strategy of delivering 90% of development at four strategic locations: Lytham and St Annes; the Fylde Blackpool Periphery; Warton; and Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. However, there remain strategic sites still to be delivered fully in each of the four strategic locations. The

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						development strategy set out below therefore takes account of the existing committed/ allocated sites at the four strategic locations in the existing Local Plan. The Options, Issues, Vision and Scope consultation invited respondents to provide input into the development strategy for the new plan. The results of the consultation are set out in the Statement of Regulation 18 Consultation. Whilst there was a wide variety of suggestions, including no development and no strategy, there was a significant degree of support for the overall approach of the existing strategy. The Local Plan will provide sites for a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land

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						over the plan period to 31 March 2042. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already

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						committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location,

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						which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. Please see Strategic Policy DST1: The Development Strategy for further information. Strategic Policy HOU2: Density and Mix of Housing will ensure that a broad mix of types and sizes of homes, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at

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						least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Please refer to Policy for further information. Strategic Policy HOU3 Affordable Housing will ensure that all market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. Please refer to Policy for further information.

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						Strategic Policy HOU4: Housing for Older People will ensure that residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age. Please refer to Policy for further information. National policy as set out above notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. Non-Strategic Policy HOU13: Conversions and Change of Use to Residential will ensure that when proposals are made for

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						conversion to residential use, they will need to demonstrate that the principle of change from the existing use is acceptable. Please see Policy for further information. Strategic Policy ENT5: Loss of Community, Leisure and Cultural Facilities and Services will ensure that unless it can be demonstrated that a facility is no longer needed the loss of community, health, leisure, and cultural facilities will be resisted. Please see Policy for further information. Strategic Policy IFR1: Service Accessibility and Infrastructure will ensure that development proposals for local infrastructure works that will benefit the residents, businesses, visitors and/or environment of the Borough of Fylde will be supported. Please

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						see Policy for further information. Non-Strategic Policy HOU13: Conversions and Change of Use to Residential will ensure that when proposals are made for conversion to residential use, they will need to demonstrate that the principle of change from the existing use is acceptable. Please see Policy for further information. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. Strategic Policy HOU3: Affordable Housing will ensure

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						that all market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. Please refer to Policy for further information. Strategic Policy HOU4: Housing for Older People will ensure that the Council will support the development of new care homes and extra care flats within accessible locations within the existing settlements areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility. Please refer to Policy for further information.

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Irene Jacques				All developments on brownfield site / low quality land.	No.	Comments noted. The Plan will encourage sustainable development and choose the most sustainable locations for development. The Council will implement several policies that will protect environments and assets to protect sites or areas from certain types of development. The Plan will encourage the redevelopment of previously developed land, although this is limited in Fylde.
John Leadbeater	No - This sounds like a 'free for all' and could endanger the character of the area which should remain largely rural.				No - the Green Belt should be protected at all costs.	Comments noted. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for

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						continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not

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						been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. The four strategic locations provide the most sustainable developable locations for development of strategic size. St Annes is the largest individual settlement in the Borough, with a main town centre and the widest range of available facilities. Whitehills and Whyndyke form extensions to the adjoining settlement of Blackpool, which is the largest settlement in the Fylde Coast sub-region and has the widest range of facilities: the areas are developing two new Local Service Centres which will ensure that local facilities are provided, as well as enabling access to the

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						widest range in Blackpool. Warton is home to the nationally-important employment site of BAE Systems: further housing growth will allow for a more balanced relationship between employment and housing which would reduce commuting and therefore represent sustainable growth. Kirkham and Wesham have good access by sustainable public transport via its railway station to the wider sub-region and the North West as a whole; Kirkham is a market town with a historic town centre that has been subject to recent improvement and investment, which is capable of supporting a larger population than it currently does; the settlements are the locations for manufacturing employment which is being currently expanded. Accordingly all four

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						locations are appropriate locations for continued growth at a strategic level within the context of the Local Plan. Please refer to Strategic Policy DST1: The Development Strategy for further information. Strategic Policy DST5 The Countryside will see to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. Please see Policy for further information. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable,

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						available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.
Keith McKay	No				NO	Comments noted.
Linda Nulty	Might do	Review Green belt areas	Answer in option 2 boxes		Yes	Comments noted. National policy notes that the general extent of Green Belts is established. It states that, once

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						established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within

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						land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3 Green Belt for further information. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified

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						through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances

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						exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3 Green Belt for further information.
Lytham St Annes Civic Society	Yes.		Warton and Preston boundary locations.		No. It should be only as an absolute last resort when all other options have been actually used e.g. brown field and infill sites.	Comments noted. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed

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						growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy DST1: The Development Strategy and Policies SLD1-SLD5 for further information. Comment noted. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of

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						Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information.
P Stanford					No – never	Comment noted. In Fylde, the areas covered by Green Belt represent only a small minority

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						of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information.

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Philip Bickerstaff	Yes	The green belt especially around Warton has been chiselled away at the edges over the years as some areas have been released and left a very jagged green belt line	The green belt area around the new development zone at Warton, should be reviewed as some of it sits directly next to the development zone and some areas of land are becoming landlocked		Yes	Comments noted. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA

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						identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in

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						the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required. Please refer to Strategic Policy DST3: Green Belt for further information. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be

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						altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt.

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						As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an

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						authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to

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						land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated

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						within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required. Please refer to Strategic Policy DST3: Green Belt for further information.
Steven Abbott	No. We question whether scope exists for strategic sustainable development outside the existing settlement pattern. A wholly fresh approach would be adverse to the existing towns including their centres. It could be a					Comments noted. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so

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	disincentive to inward investors as a consequence of uncertainty. Scope exits to expand the existing towns in a way which benefits their communities.					that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy DST1 The Development Strategy and Policies SLD1-SLD5 for further information.
Asteer Planning for Applethwaite				3.11 Applethwaite consider that a new Development Strategy should pursue balanced spatial growth across the Borough, that ensure a level of growth across the		The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure

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				Borough's sustainable settlements, rather than seeking to focus growth on the key service centres only, or on the periphery of the Borough in locations where growth may not support the vitality of Fylde Borough or its wide range of villages and settlements. 3.12 Applethwaite considers that it is critical for the spatial portrait of Fylde to consider the importance of enabling sensitive, logical and appropriate extensions to Tier 1 Larger Rural		that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in

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				Settlements to support their sustainability and meet the needs of local communities. Housing growth is essential to the vitality and vibrancy of these settlements, and ensuring an appropriate level of growth will support housing choice and provide housing for future generations. 3.13 Whichever spatial option is pursued, Applethwaite consider the site to represent the most suitable option for growth in Newton-with-Scales, in terms of its scale, location and the		unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and

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				opportunity to logically and sensitively extend the existing settlement.		Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4

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						of the plan period. Please refer to Strategic Policy DST1: The Development Strategy and Policies SLD1-SLD5 for further information. Strategic Policy DST5: The Countryside will restrict development to appropriate development to prevent uncontrolled development and low density housing at random locations, resulting in profligate use of land and the creation of homes in isolated locations. Please refer to Policy for further information. Strategic Policy DST4: Areas of Separation will help maintain the openness of areas outside the Green Belt and the identify and distinctiveness of individual settlements. Areas of separation shown on the Policies Maps are designated between Kirkham and Newton; and Wrea Green and Kirkham.

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						Please see Policy for further information.
Emery Planning for Persimmon & Charles Church				4.1 The most important consideration in the first instance is availability of land and whether sites are deliverable and/or developable. The Council should seek to understand the availability of such land through a SHLAA exercise, and it is noted that a Call for Sites exercise was carried out earlier this year (we promoted land on behalf of our client as part of this process). Other		The Council conducted a SHELAA which identified sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. The Council will ensure that development is achieved in the most sustainable way by choosing the most sustainable locations for development. National policy as set out above notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.

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				studies will also need to be undertaken to feed into the decision-making process on the spatial strategy e.g. viability, cross-boundary unmet housing needs and constraints such as flood risk and the Green Belt. 4.2 The success or otherwise of the existing spatial strategy through the adopted development should also be explored. It is likely that delivery 'on the ground' has departed from the spatial strategy set out through the adopted local plan		Strategic Policy DSA1: Achieving Good Design in Development will ensure that inappropriate development in Flood Risk Zones 2 and 3 will not be permitted. The layout of sites must recognise areas that are or will become affected by surface water flooding and plan for built development to be located away from such areas or otherwise mitigated without resulting in discharge of flood water from the site. Please refer to the Policy for further information. The Plan will include several policies that avoid or mitigate the effects of climate change, renewable energy and flood risk. Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency ensure that all new development is required to minimise flood risk impacts on the environment, retain water

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				and the reasons for that such be fully understood e.g. the deliverability and viability of sites in certain parts of the Borough. 4.3 Even if the spatial distribution in the adopted plan were carried (Option 1) forward then a substantial number of houses will need to be identified at 'strategic locations' and at the edge of settlements such as Kirrham. Notwithstanding the contribution to overall housing need, it will be necessary to		quality and water efficiency, and mitigate against the likely effects of climate change on present and future generations. Please refer to Policy for further information. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt

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				ensure that housing is delivered for each individual settlement of the Borough in the settlement hierarchy beyond the strategic locations in order to support the vitality and viability of rural communities e.g. bus services, schools, shops and public houses. 4.4 For these representations, Kirkham and Wesham is our focus. For Kirkham, the Issues for the Local Plan are set out in the consultation draft		boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for

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				as follows: • Maintaining the recovery of Kirkham Town Centre; • Identifying new sites for the next period; • Providing connectivity for pedestrians and cyclists including schoolchildren from development sites to existing facilities including the town centre. • Maintaining sufficient bus services in support of development sites away from the town centre. 4.5 As one of the three Key Service Centres, Kirkham		Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate);

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				should continue to provide range of housing and employment opportunities through the allocation of land.		• Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a

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						windfall allowance of 40 homes per annum from year 4 of the plan period. Please refer to Strategic Policy DST1: The Development Strategy for further information. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. Please refer to Strategic Policy HOU1: Housing Requirement and Supply for further information. The Plan will implement several economic development policies to positively and proactively encourage sustainable economic growth. Strategic Policy ECD7: Town, District, Local and

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						Neighbourhood Centres will encourage thriving town centres as a key priority for the Council, both for providing services to residents but also to contribute to the attraction of the towns for visitors, as part of the overall tourism offer. As highted above, Kirkham and Wesham will continue to be a key strategic location for development in the emerging Local Plan, therefore will continue to provide a range of housing and employment opportunities through allocation of land. The issues for the Local Plan: • Maintaining the recovery of Kirkham Town Centre • Identifying new sites for the next period • Providing connectivity for pedestrians and cyclists including schoolchildren from development sites to existing

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						facilities including the town centre • Maintaining sufficient bus services in support of development sites away from the town centre.
Historic England	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for	No comment at present.	No comment at present.	No comment at present.	No comment at present.	The Plan will implement several protected environments and assets policies that will protect extensive areas protected as natural assets, to individual sites protected for heritage importance. Strategic Policy ENT1: Historic Environment will ensure that proposals for development conserve, protect and enhance the character, appearance, significance and historic value of Fylde's designated and undesignated heritage assets. Please refer to Policy for further information.

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	their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP					As part of the Call for Sites assessment, the SHELAA identified sufficient sites to meet needs that are suitable, available and achievable – this included background research of sites historic environment.
Home Builders Federation				Development Strategy Options 13.The consultation draft of the plan puts forward three options for a		The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints)

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				Development Strategy for the Borough. These are. •Option 1 - Retaining the Existing Development Strategy with Updates (based on the four strategic locations in the existing Local Plan). •Option 2 – Variant on the Existing Development Strategy. •Option 3 – Entirely New Development Strategy. 14. Whilst it is noted that Questions 8 – 16		and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure

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				asks for specific views on each option, the HBF considers that it is important that the Development Strategy allows for the delivery of sufficient homes to meet the local housing needs, across a range of housing types and in a variety of locations. This should include land for larger strategic allocations as well as smaller land parcels for small and medium sized house builders. 15. Within the consultation document, the		for development at non-strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur

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				Council refers to the Green Belt as a constraint which may affect the Development Strategy for the area. The HBF would remind the Council that the NPPF states that Green Belt boundaries can only be altered in exceptional circumstances, but crucially that exceptional circumstances include, but are not limited to, instances where an authority can-not meet its identified need for homes (paragraphs 145 and 146).		throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. No distinction is made in the existing development strategy as to the relative importance of the four strategic locations, and no benchmark would be set for the number of units at each; rather, sites would be selected on overall merit, whilst maintaining a reasonable balance to the strategy. The updated development strategy takes a slightly more pragmatic approach, recognising where the most sustainable opportunities are, and how other locations present fewer sustainable sites. In relation to non-strategic locations, development is

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				16. Therefore, if local housing needs in specific locations in the Borough can only be met by Green Belt release, then the Council should consider this as an exceptional circumstance. 17. The HBF also notes that there are a number of allocations in the existing plan which have not yet been developed. The HBF considers that if these are to be 'rolled forward' to the new Local Plan, the Council will need to understand why these sites have		directed on the basis of the most sustainable pattern of development reflecting the opportunities from sites brought forward, rather than applying benchmarks to individual settlements as were applied previously. Please refer to Strategic Policy DST1: The Development Strategy for further information. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The Council will implement several housing policies into the Plan to ensure that a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families

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				not yet come forward and ensure that any issues identified can then be addressed in the new Local Plan so that these sites can be delivered. 18.The Development Strategy also appears in places to discount settlements for future growth on the basis that strategic allocations have already been built out (eg. paragraph 3.10). The HBF wishes to highlight that this plan will be covering a new plan period and		with children, single persons and older people. Strategic Policy HOU2: Density and Mix of Housing ensures that a broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a

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				the Development Strategy will need to be informed by housing needs over that new plan period, rather than being informed by what has taken place over a previous plan period.		kitchen will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Please refer to the Policy for further information. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options.

Respondent name	(12) Do you support Option 3?	(13) What would your new development strategy be, if you support Option 3?	(14) Where would new development be located under your suggestion for this option?	(15) Please give any other comments you wish to make on this option.	(16) Would you support Green Belt release to secure this option?	Council Response
						In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.

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						The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required.

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						Please refer to Strategic Policy DST3: Green Belt for further information. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The current housing commitments are: - St. Annes (including Squires Gate) = 921 units

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						- Whitehills and Whyndyke = 2,147 units - Warton = 204 units - Kirkham and Wesham = 117 units
National Highways	Q12. Option 3 introduces significant flexibility but also considerable uncertainty regarding infrastructure planning and transport impacts. From an SRN perspective, the abandonment of a structured spatial strategy increases the	Q13. See Q12.	Q14. Any new development strategy is to be subject to a comprehensive transport evidence base, including cumulative impact assessments and junction capacity modelling, and should be evaluated for their proximity to the SRN for the potential to generate significant traffic volumes.	Q15. N/A.	Q16. WSP recommend that National Highways are not supportive to the release of Green Belt. Any new land released for development is likely to put pressure on the SRN.	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular,

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	risk of dispersed development placing unplanned pressure on SRN junctions, particularly M55 Junctions 3 and 4.					choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's

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						built and natural environment, including nature conservation sites, heritage assets and local characteristics. The Council will implement several infrastructure and transport policies to ensure sustainable development of local services and infrastructure including transport: footways, cycleways, highways, airports, railways, tramways, bus stops, bridleways, coach parking and park and ride. The Council continues to be in discussion with National Highways regarding M55 Junctions 3 and 4. Regarding question 13, please see above response As part of the Call for Sites assessment, the SHELAA was used to identify sufficient sites to meet needs that are suitable, available and

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						achievable including factors affecting transportation and accessibility. This will continue to be an influencing factors as part of any new development. Strategic Policy IFR: Service Accessibility and Infrastructure will ensure development proposals for local infrastructure works that will benefit the residents, businesses, visitors and/or environment of the Borough of Fylde will be supported. This includes demonstrating how access to services will be achieved by means other than the car, and where appropriate, demonstrate how the range of local social and community services and facilities available will be suitable and accessible for the intended occupiers or user(s) of the development. Please see Policy for further information.

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						Strategic Policy IFR5: Enhancing Sustainable Transport Choice will ensure that developments improve community health and wellbeing by providing and encouraging take up of alternative means of transport such as walking and cycling. Please see Policy for further information. Strategic Policy DSA1: Achieving Good Design in Development will work alongside wider policies to ensure that development is of a high standard of design, taking account of the character and appearance of the local area. Please see Policy for further information. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either

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						Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.
Pegasus Group for			Nevertheless, at this stage the indication is that a strategy, where more development is	3.13. The options to be considered moving forwards need to be subject	Just specifically on Q16, it is also not expected that there will be a	The overall strategy for directing where new development and investment will be located in Fylde is set

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Rowland Homes			directed to a wider range of locations, including sustainable rural locations such as Wrea Green should be pursued for the next Plan. 3.15. This will then support a wide range of sites in a variety of locations and will better ensure that a deliverable and developable suite of sites will be identified, as opposed to directing more development into the same strategic locations which have failed to deliver as expected during the current Plan period, or a single strategic location which will likely result	to a full SA/SEA process in due course and Rowland Homes reserve the right to make further comments as and when this is made available.	need to consider Green Belt release, given large amounts of Fylde that is not constrained by Green Belt, although if this option were to be considered, then complying with para 146-148 of the NPPF will be critical.	against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding

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			in similar implications to the current strategy.			where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of

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						deliverable/ developable sites. A decision is then needed on the balance of development between the different places. Please refer to Strategic Policy DST1: The Development Strategy for further information. There is development pressure throughout the rural areas for housing in unsustainable locations, and in particular for the development of existing homes into very large units, which in turn reduces the supply of smaller or medium-sized homes within those settlements. Housing in the rural areas is the least affordable in the Borough and properties suitable for newly forming households or those seeking to downsize originating in the rural areas are scarce. Much of the rural area is sparsely populated and with community facilities and

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						services largely absent. It is therefore of critical importance to ensure those facilities that exist are protected. There is development pressure for the enlargement of rural villages beyond the level of development needed to support existing facilities. This would then put pressure on existing facilities and lead to a need for additional facilities normally found in towns. Most rural land is in agricultural use, and a significant proportion is grade 2, with only a very small proportion being grades 4 or 5. The ability of agricultural businesses to diversify whilst maintaining agricultural use of land has been important in recent years. Therefore many farm sites include ancillary businesses, and some have been fully redeveloped for other employment uses where

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						consolidation of farm holdings has occurred. There is pressure for alternative use of agricultural land for renewable energy generation, and the development of extensive solar farms has occurred. Strategic Policy DST5: The Countryside will prevent uncontrolled development including low density housing at random locations, resulting in profligate use of land, the creation of homes in isolated locations. Please refer to the Policy for further information. Regarding the comments under question 15 the Council is working with external companies to do this and when published will be notified. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land.

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						Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.
PWA Planning for Dixon	An entirely new strategy based					Comments noted. The Development Strategy retains

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Grange The Villa	on a new settlement (Option 3) would introduce significant and unnecessary risk and delay. 4.9. We do not support Option 3 (a new settlement) at this stage due to the complexity and delays it would introduce. Existing settlement boundaries should be reviewed, and nearby sustainable sites, such as The Villa should be included					the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was

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	within any revised boundaries as a minimum.					brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy: DST1 The Development Strategy for further information. Development proposals on sites within settlement boundaries will be assessed against all relevant Local Plan policies. Please refer to Strategic Policy DST2:

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						Settlement Boundaries for further information.
PWA Planning for Medicom	An entirely new strategy based on a new settlement (Option 3) would introduce significant and unnecessary risk and delay. 4.10. We do not support Option 3 at this stage due to the complexity and delays it would introduce. 4.11. However, we must be clear that any credible development strategy for				4.12. Therefore, a Green Belt review is not an 'option' but a necessity. The inability to meet identified development needs on non-Green Belt land constitutes the "exceptional circumstances" required by paragraph 146 of the NPPF to justify a review. 4.13. We therefore strongly support a Green Belt review as the essential mechanism to	Comments noted. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure

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	Fylde will require a comprehensive review and release of Green Belt land. As established, the non-Green Belt land supply is insufficient to meet the borough's Objectively Assessed Housing Need (OAHN).				identify and allocate the most sustainable and deliverable sites to meet Fylde's housing needs. This review must identify previously developed 'Grey Belt' land in sustainable locations, such as School Farm, Warton, as a priority for release.	for development at non-strategic locations. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy: DST1

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						The Development Strategy for further information. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or

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						Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether

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						the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required. Please refer to Strategic Policy DST3: Green Belt for further information. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional

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						homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. Please refer to Strategic Policy HOU1: Housing Requirement and Supply for further information. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options.

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						In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.

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PWA Planning for Pringle Homes	An entirely new strategy based on a new settlement (Option 3) would introduce significant and unnecessary risk and delay. 4.9. We do not support Option 3 (a new settlement) at this stage due to the complexity and delays it would introduce. 4.10. However, any credible development strategy for Fylde must involve a					The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations.

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	comprehensive review of local restrictive designations, including the Areas of Separation (AoS). As established in our Call for Sites submission, the Greenlands Farm site is currently constrained by the AoS designation between Wrea Green and Kirkham. 4.11. Our proposed development has been sensitively					The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy DST1: The Development Strategy for further information. The Area of Separation has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise

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	designed to respect the function of this designation by ensuring no new built form extends east of the main access road, thereby maintaining the strategic gap and preventing coalescence with Ribby. Furthermore, the redevelopment of the existing cluster of dilapidated buildings within the AoS would represent a net improvement to openness and the character of the area .					the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information.

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	4.12. The current AoS policy is a blunt instrument that does not allow for such nuanced, sitespecific benefits to be properly weighed in the planning balance. A review of this designation is therefore a necessity to ensure that the most sustainable and deliverable sites, like Greenlands Farm, can come forward to meet the					

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	borough's housing needs.					
PWA Planning for Ribby Hall	3.7. Any credible development strategy for Fylde must involve a comprehensive review of local restrictive designations, including the Areas of Separation (AoS). 3.8. The current AoS policy is a blunt instrument that does not allow for such nuanced, sitespecific benefits to be properly				3.9. Additionally, we must be clear that any credible development strategy for Fylde will require a comprehensive review and release of Green Belt land. 3.10. Therefore, a Green Belt review is not an 'option' but a necessity. The inability to meet identified development needs on non-Green Belt land constitutes the "exceptional circumstances" required by	The Area of Separation has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of

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	weighed in the planning balance. A review of this designation is therefore a necessity to ensure that the most sustainable and deliverable sites, and to ensure the allocation can correctly be re-drawn in the context of the existing ownership of Ribby Hall Village. 3.9. Additionally, we must be clear that any credible development				paragraph 146 of the NPPF to justify a review. 3.11. We therefore strongly support a Green Belt review as the essential mechanism to identify and allocate the most sustainable and deliverable sites. This review must identify previously developed 'Grey Belt' land in sustainable locations, in this regard it relates to the land to the south east of Ribby Hall Village which offers limited contribution to	Separation for further information. Strategic Policy ECD8: Leisure, Culture and Tourism Development will protect key tourism assets such as Ribby Hall Holiday Village. Development of additional leisure, cultural and tourism uses at the major rural holiday parks will be permitted within the defined boundaries of the sites, provided that the amenities and character of the sites are preserved and enhanced. Please see Policy for further information. Any proposal for extension of the major rural holiday parks will need to meet the tests in Policy DST5, DST4 or DST3 as appropriate. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt

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	strategy for Fylde will require a comprehensive review and release of Green Belt land.				the purposes of the Green Belt.	boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt.

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						As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made

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						representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required. Please refer to Strategic Policy DST3: Green Belt for further information. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional

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						circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in

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						Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information.
PWA Planning	An entirely new strategy based on a new settlement (Option 3) would introduce significant risk and delay. 4.8. We do not support Option 3 at this stage. Proposing an entirely new				4.9. However, we must be clear that any credible development strategy for Fylde will require a comprehensive review and release of Green Belt and Area of Separation land. As established, the non-Green Belt land supply is	The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible,

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	strategy, such as a new settlement, would introduce considerable complexity and delay to the plan-making process, requiring a vast new evidence base and likely pushing the plan's adoption beyond the critical 2026 deadline. This would create a prolonged period of policy uncertainty.				insufficient to meet the borough's OAHN. 4.10. Therefore, regardless of whether a variant of Option 2 or a new strategy under Option 3 is pursued, a review of these designations is not an 'option' but a necessity. The NPPF is clear that Green Belt boundaries are not sacrosanct and should be reviewed through the planmaking process where "exceptional circumstances are fully evidenced and justified". An inability to meet	enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the

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					identified development needs on non-Green Belt land constitutes such exceptional circumstances. Page 13 4.11. We would therefore support Green Belt and Area of Separation release as an essential component of any sound and deliverable development strategy for Fylde to 2042.	Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/ developable sites. A decision is then needed on the balance of development between the different places. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already

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						committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Please refer to Strategic Policy DST1 The Development Strategy for further information. National policy notes that the general extent of Green Belts is

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						established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within

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						land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information. The Area of Separation has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to

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						provide a more defensible and appropriate permanent boundary. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will

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						need to be 6,656 homes. Please refer to Strategic Policy HOU1: Housing Requirement and Supply for further information.
Steven Abbott Associates for Bradkirk Business Park	No. We question whether scope exists for strategic sustainable development outside the existing settlement pattern. A wholly fresh approach would be adverse to the existing towns including their centres. It could be a disincentive to inward investors as a					The overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of

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	consequence of uncertainty. Scope exits to expand the existing towns in a way which benefits their communities.					climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close proximity will reduce the need to travel. The size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation

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						sites, heritage assets and local characteristics. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations.

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						The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites

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						are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. Please refer to Strategic Policy DST1: The Development Strategy for further information. Please refer to Policies SLD1-SLD5 for specific requirements for individual sites to provide on-site infrastructure and connectivity to surrounding areas, and particular issues that will need to be addressed on individual sites.
Tyson Construction and Carter on behalf of JP Carter and R.P. Tyson Construction Ltd			We believe that the Local Plan for Fylde to 2042 should allocate new development in Freckleton on a site submitted during the recent call for sites exercise. The following representation provides further evidence and			There are limited employment areas within Freckleton, meaning that Freckleton largely has a dormitory function. There is limited transportation option with no railway station and is distant from the nearest one, meaning that access to places outside the local area are much more

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			justification for the inclusion of this site within the emerging Local Plan. 1. Introduction This representation is jointly submitted by JP Carter (landowner) and Tyson Construction (developer) to promote a potential residential development opportunity in Freckleton. The site was submitted to Fylde Council during the recent Call for Sites exercise. This submission provides additional justification for its allocation within the new Fylde Local Plan to 2042, demonstrating that the			likely to be made by car than is the case in more sustainable areas. The distances from the village to Lytham and Kirkham are too long for the casual cyclist, meaning that cycling as an active travel option to the local town centres is much less likely to be taken up. Freckleton will not be taken forward as a strategic location mainly due to green belt constraint. The green belt remains a constraint to development. The Plan will protect existing services and facilities within Freckleton including heritage assets. Each site that was submitted during the Call for Sites was assessed as part of the SHELAA to identify sufficient sites to meet needs that are suitable, available and achievable within

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			site is both sustainable and deliverable. Our shared vision is to deliver a sensitive residential extension to the settlement of Freckleton comprising up to 50 dwellings on approximately 2 hectares of land (please refer to indicative plans submitted with the Call for Sites). The remaining 4 hectares would be retained as a Biodiversity Net Gain (BNG) habitat bank, providing local ecological benefits and the potential for off-site biodiversity credits for nearby developments. The site is available now, suitable for development, and free			land that is not designated as Green Belt. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either

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			from significant constraints. We would be pleased to work collaboratively with the Council to refine the proposal as necessary to align with the Local Plan's strategic objectives. While the land currently lies within the Green Belt separating Freckleton and Kirkham, we believe it meets the emerging definition of "Grey Belt" as set out in Annex 2 of the National Planning Policy Framework (December 2024) - representing a realistic and policy-supported opportunity for managed, sustainable release. 2. General Comments			Areas of Separation, or Countryside. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042

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			on Development Strategy & Housing Need The Council's Issues and Options consultation identifies three strategic options. While Options 1 and 2 largely continue the existing approach of focusing growth in strategic locations, Option 3 presents a new direction, potentially including limited Green Belt release. However, paragraph 6.31 of the consultation document suggests the Council does not currently consider a Green Belt review necessary, assuming sufficient developable land will be available			to meet needs in Fylde will need to be 6,656 homes. Please refer to Strategic Policy HOU1: Housing Requirement and Supply for further information. National policy as set out above notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.

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			elsewhere. Given that the housing requirement for the new plan period has not yet been confirmed, particularly with the potential to accommodate Blackpool's unmet housing need, this assumption appears premature. Until housing requirements are fully established, the availability of adequate non-Green Belt land cannot be assured. 3. The Case for Considering Green Belt Land Paragraph 146 of the National Planning Policy Framework (NPPF)			

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			makes clear that an authority's inability to meet identified housing needs can constitute an exceptional circumstance justifying alteration of Green Belt boundaries. At this early stage, it has not been demonstrated that all housing and development needs can be met without such a review. A refusal to consider Green Belt (or Grey Belt) land risks over-reliance on a limited number of strategic sites dominated by large housebuilders, undermining the NPPF's emphasis (paragraph 78) on supporting small and medium-sized sites delivered by SME			

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			developer/contractors. Our proposed site would directly respond to this national objective, being promoted by Tyson Construction, a well-established local SME with a proven track record in both market and affordable housing delivery. Development here could also contribute positively under the Golden Rules of paragraph 155, including: • Providing up to 15% more affordable housing than the Local Plan baseline; • Supporting local and national infrastructure			

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			improvements; and • Delivering accessible public greenspace for residents and the wider community. Even if the Council concludes that Green Belt release is unnecessary, there is no certainty that a Local Plan Inspector will share this view. It would therefore be prudent and forward-thinking for the Council to identify sustainable, deliverable Green Belt (or Grey Belt) sites as a contingency. This site offers such an opportunity, capable of accommodating 10 to 50 dwellings within a well-planned, landscape-sensitive			

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			framework. 4. The Case for Bringing Forward This Site Aside from its Green Belt designation, the site is free from major constraints and is highly sustainable: • Within walking distance of shops, schools and healthcare; • Close to employment opportunities at the BAE Warton Enterprise Zone; • Outside any flood risk areas and environmental designations; • Capable of safe and practical access from Kirkham Road, adjacent to an existing bus route; and			

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			• Readily serviceable by existing utilities (water, gas, electricity). Should the site be reclassified as Grey Belt, development would also secure: • Clearly identified affordable housing provision; • Infrastructure funding contributions; and • Enhanced greenspace access for the community. This is a deliverable, policy-aligned opportunity that can make an early and meaningful contribution to housing delivery during the plan period. 5. Conclusion			

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			The new Fylde Local Plan must remain flexible and evidence-led. Until the housing requirement and any unmet need from neighbouring authorities are confirmed, it cannot reasonably be concluded that a Green Belt review is unnecessary. Our proposed site is: • Available (with full landowner support) • Deliverable (with a committed developer partner) • Sustainable (aligned with local and national planning objectives) We therefore			

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			respectfully request that the Council: 1. Retain an open position on the need for a targeted Green Belt (or Grey Belt) review; and 2. Give positive consideration to this sustainable site at Freckleton for future residential allocation. We welcome continued engagement with the Council to develop our vision further and to provide detailed supporting evidence at subsequent stages of the Local Plan process. This site represents a realistic, deliverable and locally supported opportunity to meet Fylde's future housing			

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			needs while achieving environmental and community benefits.			
Woodland Trust	As above, we would stress that in any new development strategy, any proposed areas for development must not impinge upon existing woodland.				The Woodland Trust would not support the release of Green Belt land unless it can be clearly demonstrated that all suitable brownfield land options have first been fully exhausted. Green Belt areas often contain valuable woodland, trees, and other habitats that contribute to biodiversity, climate resilience, and public wellbeing.	As part of the Fylde Local Plan Vision in 2042, the Council aims to have increased open space and woodland cover and Fylde's unique offer of Green and Blue Infrastructure will be accessible and contribute to a high quality of life. Policy ENT9: Natural Assets on Development Sites will ensure that development proposals are required to demonstrate that existing woodlands have been fully considered and have informed site design and layout from the outset. The Policy states that proposals should protect trees and woodlands that contribute to the character, amenity and environmental value of the site. Please refer to Policy for further information.

Respondent name	(12) Do you support Option 3?	(13) What would your new development strategy be, if you support Option 3?	(14) Where would new development be located under your suggestion for this option?	(15) Please give any other comments you wish to make on this option.	(16) Would you support Green Belt release to secure this option?	Council Response
					Should Green Belt release be considered, it is essential that no existing woodland or priority habitats are lost or degraded, and that the wider environmental and ecological value of these areas is fully assessed and protected. Green Belt land should remain a vital part of Fylde's green infrastructure network and only be developed as an absolute last resort.	National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to

Respondent name	(12) Do you support Option 3?	(13) What would your new development strategy be, if you support Option 3?	(14) Where would new development be located under your suggestion for this option?	(15) Please give any other comments you wish to make on this option.	(16) Would you support Green Belt release to secure this option?	Council Response
						meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information.

Respondent name	(17) Should the Local Plan provide for:	Please specify	(18) Please explain your reasoning for the figure you have suggested.	Council Response
Alban Cassidy	410 homes per year plus a number agreed through the Fylde Coast Duty to Co-operate process if unmet need arises, consistent with sustainable development?	n/a	The revisions to the Standard Method have had the effect of increasing the housing requirement for Fylde and this should be reflected in the Local Plan. Fylde is a relatively sparsely developed area and has the capacity to accommodate new development which neighbouring authorities are not capable of doing. Therefore it is appropriate that artificial and unsustainable constraints such as small areas of green belt that do not play a strategic function should be reviewed to enable the most sustainable form of development to be proposed.	Revisions to the Standard Method shows the annual housing requirement to be 416 net dwellings per annum over the plan period. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.
Anna Briggs	A higher figure?	n/a	n/a	Comment noted. The government requires that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the

Respondent name	(17) Should the Local Plan provide for:	Please specify	(18) Please explain your reasoning for the figure you have suggested.	Council Response
				plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
Christine Abbott	A lower figure?	n/a	Over 7000 homes up until 2042 is a huge amount. [Text redacted]	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
David Chedd	A lower figure?	0	We have already passed the point of unsustainability. At what point does this incessant yet unsustainable growth stop? There are no good outcomes if we continue to meet uncontrolled demand with unsustainable supply. It can only	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households

Respondent name	(17) Should the Local Plan provide for:	Please specify	(18) Please explain your reasoning for the figure you have suggested.	Council Response
			lead to war, revolution, famine, flooding, pestilence and the breakdown of all the physical and natural processes that enable survival on this planet.	such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
Emma Swindells	A lower figure?	1	Because fylde is not enjoyable to move through as all the roads busy, in a poor state, surface flooding. We don't have further education facilities-6th form	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any

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				needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
Ethan Ellison	410 homes per year plus a number agreed through the Fylde Coast Duty to Co-operate process if unmet need arises, consistent with sustainable development?	n/a	It's important to recognise the role of commuting within Fylde and neighbouring borough, therefore the council should have a surplus to develop if necessary to keep prices low and perhaps restricted with local affordability requirements. More allocations per site = more viability = more affordable homes.	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the

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				plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
Frank Andrews	A lower figure?	350	410 is far too high for this borough without proof that housing in this borough is needed.	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the

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				plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
Frank Andrews	A lower figure?	the lowest figure possible. 410 homes is an impossible target for this borough to meet	n/a	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
Gerard Malone	410 homes per year plus a number agreed through the Fylde Coast Duty to Co-operate process if unmet need	n/a	We need so many new houses. 410 seems like a good place to start but shouldn't be restrictive either.	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households

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	arises, consistent with sustainable development?			such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
Hannah Dell'Armi	410 homes per year plus a number agreed through the Fylde Coast Duty to Co-operate process if unmet need arises, consistent with	n/a	n/a	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key

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	sustainable development?			aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
Haydn Payne (on behalf of the Caravan and Motorhome Club)	410 homes per year plus a number agreed through the Fylde Coast Duty to Co-operate process if unmet need arises, consistent with sustainable development?	n/a	n/a	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key

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				aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
Irene Jacques	A lower figure?	100	Local services (NHS, schools) are already stretched.	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key

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				aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
John Leadbeater	A lower figure?	Just less	I don't have the data to challenge the above figures but they are just predictions and I question the assumptions on which they are based.	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

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				The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
John Maskell	410 homes per year?	n/a	There are plenty of brown field sites in neighbouring authorities, particularly Blackpool.	The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
Keith Gorton	A lower figure?	200	The scale of housing in some areas results in small villages becoming large villages and ultimately small towns, but without the infrastructure to support or cope with them. All of this risks a loss to the rural character of the Fylde, and should be guarded against in any amendments to the Local Plan.	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key

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				aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The four Strategic Locations for Development include strategic development sites, comprising land for homes, employment, commercial and leisure uses. Development of these sites will help ensure that the Plan's Development Strategy, Vision and Strategic Objectives are achieved in order to accommodate the level of development and growth required within the lifetime of the Local Plan. It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable. It is always preferable for infrastructure to be delivered up-front before the development takes place; however, this is often difficult to achieve, as contributions from development sites

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				towards off-site infrastructure can only reasonably be required once some of the development value has been realised. The Infrastructure Delivery Plan (IDP) and accompanying Infrastructure Delivery Schedule identify the required essential infrastructure – what it comprises and where and when it will be needed, as well as the likely providers and funding sources. Where there is a funding shortfall, developers will be expected to directly provide and / or contribute towards the necessary infrastructure, subject to viability.
Keith McKay	A lower figure?	305	The figures appear to be based around a nationally averaged figure when the key problems are in the South East. Building houses without a clear link to useful employment (i.e. something that contributes positively to the economy) seems a total waste of time and resources for political gain, rather than public benefit.	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per

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				year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The four Strategic Locations for Development include strategic development sites, comprising land for homes, employment, commercial and leisure uses. Development of these sites will help ensure that the Plan's Development Strategy, Vision and Strategic Objectives are achieved in order to accommodate the level of development and growth required within the lifetime of the Local Plan.
Linda Nulty	A lower figure?	We should be providing housing for our residents and work force - not dormitories for other areas, which is what we are doing at present	As above	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per

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				year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. Strategic Policy ECD4: New Employment Land Provision allocates a minimum of 24.49 ha of employment land for the period to 2042. Existing employment areas identified in the existing Local Plan were reviewed and concluded that 33 of 35 sites should remain protected in the new plan for employment uses. Strategic Policy ECD5: Protection of Existing Employment Areas proposes that existing employment areas will be retained in industrial, storage/distribution, light industry, office or sui generis industrial/commercial non-town centre uses, unless it is demonstrated to the satisfaction of the Council that there is no reasonable prospect of the site being used for any of those purposes, having satisfied the tests of Policy ECD10. Any proposed alternative use will not be acceptable unless it is demonstrably compatible with any existing use in the remainder of the designated existing employment area, with any potential employment use that could locate in close proximity within the remainder of the designated employment area in the future, and with likely uses on any adjoining allocated employment site. Proposals for alternative uses will also have to

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				satisfy the requirements of other policies of the Plan, in particular Policy DSA1. Strategic Policy ECD6: Employment Opportunities and Commercial/ Employment Premises proposes that the availability of land in the Borough for commercial/ employment opportunities is limited. Therefore, the Council seeks to retain continued employment use of current commercial/ employment premises. This could include any type of commercial/ employment premises or uses, including agriculture and not limited to particular use classes/ descriptions or defined areas. Land and premises will be retained in commercial/ employment use unless it is demonstrated to the satisfaction of the Council that there is no reasonable prospect of the site being used for those purposes, having satisfied the tests of Policy ECD10. Proposals for alternative uses will also have to satisfy the requirements of other policies of the Plan, in particular Policy DSA1.
Lytham St Annes Civic Society	410 homes per year?	n/a	As this is the required number it should not be exceeded and we believe a lower number would be preferable as access to the area is limited and the infrastructure is not available to support a large increase. The Fylde must not absorb the Blackpool excess.	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities.

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				The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
Marcus Dowling	410 homes per year plus a number agreed through the Fylde Coast Duty to Co-operate process if unmet need arises, consistent with sustainable development?	n/a	Flexible	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under

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				government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
Martin Alderman	A lower figure?	1	Test	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the

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				plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
P Stanford	A lower figure?	A lower figure (half .. 200 ?) – and Fylde should immediately withdraw from the co-operate process with regards to house building and not take allocations from other authorities. AGAIN, FBC needs to be FIRM and say NO – residents don't want more houses built here 'cos other authorities can't manage their allocation – VERY SIMPLY .. that's currently their	Firstly the whole planning process is completely in the favour of developers and not residents or even authorities. I've watched a few planning committee meetings - FBC needs to be tougher and braver. Am surprised more planning committee members don't have something to say at the meetings – and that questions its effectiveness. You need to say NO when it's clear that its not right or in the best interest of Fylde and its communities. Stand up for residents more .. you are there for US and certainly not for developers or government ! I would like to see all planning committee decisions as a named recorded vote. For public clarity and accountability, it seems only fair that the voting record is in the written public record as to who voted for what. (please share that with democratic services) What ever figure you come up with, NO MORE HOUSES in Wesham or Kirkham. K&W have taken more than their fair share of a crazy target top down allocation – K&W infrastructure is already overstretched in fact	Comments noted. Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added

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		problem NOT Fylde's !	broken in some places – plus the fact that everywhere you have allowed building around K&W the past 15 years or so has ongoing flooding issues.	once the Statement of Common Ground has been agreed.
Philip Bickerstaff	A higher figure?	n/a	n/a	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
Stephen and Jacqueline Croft	A lower figure?	I have no data to provide a figure - but	The Government Policy figure of 410 seems arbitrary. The local review seems to support a larger figure but a target number is far less	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be

Respondent name	(17) Should the Local Plan provide for:	Please specify	(18) Please explain your reasoning for the figure you have suggested.	Council Response
		please see comments below	important than getting the balance right. The building rate needs to match capability and associated infrastructure updating and so should not be set without this broader context. It is not clear whether building at a high rate in teh Flyde will simply suck people in from other areas are actually meet the local need. This is important to consider since the area is already apparently faster that other areas in Lancashire and Nationally. There are currently thousands of empty homes in the UK. These homes, wherever practical, should be refurbished and utilised. Additionally, there are many family homes being lived in by just one person becuase there is no suitable alternative smaller accommodation for these people to move into. It would be interesting to know how the government came up with the figure of 410. Downsizing opportunities may be something to consider for our older population ... and affordable housing should not be conflated with cheap or shoddy units of high concentration in the least desireable parts of a development ... there needs to be an emphasis of quality and quality of life ... lets not be driven by number alone and lets try to avoid the mistakes of the '60's ...	a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. Developments will be expected to make efficient use of land, whilst avoiding detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of the surrounding area. It is expected that this will normally result in a

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				minimum net residential density of 30 homes per hectare. A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Sites of 10 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 30% of housing units as affordable housing, in accordance with Policy HOU3. Sites of 20 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 20% of housing units designed specifically to accommodate older people, in accordance with Policy HOU4.

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				Sites encompassing 50 or more dwelling plots (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 4% of the total number of dwellings on the site through unbuilt serviced plots for custom- and self-build housing, in accordance with Policy HOU10.
Steven Abbott	A higher figure?	n/a	My clients have approved the comprehensive representations being made by Taylor Wimpey.	The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.
Susan Lee	A lower figure?	250	Lack of infrastructure	The four Strategic Locations for Development include strategic development sites, comprising land for homes, employment, commercial and leisure uses. Development of these sites will help ensure that the Plan's Development Strategy, Vision and Strategic Objectives are achieved in order to accommodate the level of development and growth required within the lifetime of the Local Plan. It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable. It is always preferable for infrastructure to be delivered up-front before the development takes place; however, this is often difficult to achieve, as contributions from development sites

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				towards off-site infrastructure can only reasonably be required once some of the development value has been realised. The Infrastructure Delivery Plan (IDP) and accompanying Infrastructure Delivery Schedule identify the required essential infrastructure – what it comprises and where and when it will be needed, as well as the likely providers and funding sources. Where there is a funding shortfall, developers will be expected to directly provide and / or contribute towards the necessary infrastructure, subject to viability.
Asteer Planning for Applethwaite	3.14 Applethwaite strongly considers that the new Local Plan should, as a minimum, seek to meet the housing needs of the Borough as mandated by the Government's Standard Method, with the most recent figure being 415 homes per year. In accordance with Government Policy, the Council must seek to, as a minimum, meet their local housing needs, informed using the Standard Method, (including meeting the	n/a	3.14 Applethwaite strongly considers that the new Local Plan should, as a minimum, seek to meet the housing needs of the Borough as mandated by the Government's Standard Method, with the most recent figure being 415 homes per year. In accordance with Government Policy, the Council must seek to, as a minimum, meet their local housing needs, informed using the Standard Method, (including meeting the needs of neighbouring Authorities if appropriate); unless there are strong reasons why an authority cannot do this. Paragraph 11 in the NPPF states that: "For plan-making, this means that: b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong	The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the

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	needs of neighbouring Authorities if appropriate); unless there are strong reasons why an authority cannot do this. Paragraph 11 in the NPPF states that: "For plan-making, this means that: b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh		reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. 3.15 Applethwaite does not consider that there is any strong reason for restricting development in Fylde, nor would doing so outweigh the benefits of meeting the Borough's identified housing needs. As such, Fylde should plan for 415 new homes per annum, as an absolute minimum. Applethwaite do, however, consider that the Council could also plan for higher housing growth to support neighbouring authorities and to support economic growth. 3.16 As identified within this consultation, there may be a requirement to accommodate development needs of neighbouring areas. Blackpool's housing need has increased significantly as a result of the new standard method, from 147 dwellings to 587 per annum. Blackpool is currently developing a new Local Plan and as part of their evidence base will undertake a Housing Needs Assessment, Green Belt Review and Housing Land Availability Assessment. If the outcome of these assessments determine that Blackpool cannot meet all of its housing need within its area, Blackpool Council is required to approach both Fylde and Wyre Councils to request	up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy as set out above notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. Therefore, the overall Local Plan requirement is 6,656 net additional homes.

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	the benefits, when assessed against the policies in this Framework taken as a whole.		whether any of the unmet need can be accommodated. 3.17 As per the Fylde Coast Duty to Co-operate process, Applethwaite supports Fylde accommodating a higher housing requirement figure if required by neighbouring authorities, such as Blackpool. Planning for higher housing growth also offers an opportunity to support economic growth and underpin new employment opportunities in the Borough.	
Emery Planning for Persimmon & Charles Church	5.1 A higher figure is required than the 410 dwellings per annum. At this stage we cannot quantify the figure as that will be dependent on: • The outcome of a Housing and Employment Needs Assessment; and • The outcome of Duty to Co-operate with Blackpool and Wyre. 5.2 We do consider that the need to accommodate Blackpool's needs will	n/a	5.3 Paragraph 62 of the Framework states: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." 5.4 Local Housing Need is defined in Annex 2 of the Framework: "The number of homes identified as being needed through the application of the standard method set out in national planning practice guidance." 5.5 Paragraph 003 of the PPG states: "Is the use of the standard method for strategic policy making	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the

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	require a substantial uplift.		purposes mandatory? The standard method should be used to assess housing needs. However, it is recognised that there are some specific circumstances in which an alternative approach could be justified, for example as explained at paragraph 014 below.” 5.6 With the standard method as a minimum, the only other alternative in the PPG is a higher requirement which is expressly set out in paragraph 14 of the PPG and paragraph 69 of the Framework which states: “The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment”. 5.7 The current Local Housing Need for Fylde of 419 dwellings is higher than 410 dwellings in the consultation document and this is the starting point for the housing requirement for the emerging local plan. The Council should also consider whether an uplift is appropriate to address unmet affordable housing needs and the economic vision and aspirations for the Borough in the context of existing trends pointing towards a contracting working age population that is more acute than other parts of the country. A Housing and Employment Needs Assessment should be	plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. Strategic Policy HOU2: Density and Mix of Housing states that developments will be expected to make efficient use of land, whilst avoiding detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of the surrounding area. It is expected that this will normally result in a minimum net residential density of 30 homes per hectare. A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they

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			undertaken. 5.8 An additional key point is paragraph 62 of the Framework which states: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." 5.9 Local housing need for Blackpool is 587 dwellings per annum, and it is 598 dwellings per annum for Wyre. The housing need for these two authorities far exceeds their adopted local plan requirements and there are constraints in both authority areas e.g. the Blackpool SHLAA 2019 identifies a developable supply to satisfy their lower adopted housing requirement to the year 2026 only. It is likely that Fylde (and Wyre) will need to account for unmet housing needs from neighbouring areas in addition to its own local housing need. 5.10 As set out earlier, assuming an adopted Local Plan in October 2027, the plan period should be to	meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Sites of 10 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 30% of housing units as affordable housing, in accordance with Policy HOU3. Sites of 20 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 20% of housing units designed specifically to accommodate older people, in accordance with Policy HOU4. Sites encompassing 50 or more dwelling plots (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 4% of the total number of dwellings on the site through unbuilt serviced plots for custom- and self-build housing, in accordance with Policy HOU10. The release of land away from the main settlements for development will have been minimised and the highest quality agricultural land will have been protected from development. Rural settlements will have had provision of housing of an appropriate type, tenure, design, density and mix to address local needs and issues of affordability. In rural areas

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			2043 as a minimum in order to provide a full 15 years from adoption. However, we consider that the plan period will need to be extended further as a minimum, on the basis that it is unlikely that the plan will be adopted before October 2027 as local plans can be subject to considerable delays and apply a cautious approach (to avoid the need for further changes during the examination). Therefore, we consider 2045 would be appropriate with a housing requirement for 2025 to 2045 which would be a minimum of 8,380 dwellings. 5.11 As to the residual requirement to be met by new allocations, the Five-Year Housing Land Supply Statement 2024 (December 2024) sets out a supply of 3,935 dwellings for the period post 2025. These sites must meet the deliverability tests set out within the Framework to ensure the housing supply will be robust upon adoption. If they are deliverable the residual requirement to be met by new sites is at least 4,445 dwellings. This does not factor in meeting Blackpool's housing needs. 5.12 We consider that there should be a buffer of at least 10% which is based on the Local Plans Expert Group report to the Communities Secretary and to the Minister of Housing and Planning where a 20% buffer was recommended. The report recommends at paragraph 11.4 that the Framework should make clear that local plans	the rural economy will thrive, in particular small and medium sized enterprises. Densities within large sites are likely to vary based on the dwelling mix. The requirements for densities applies to the whole residential part of the site. Areas of lower-density development within a large site can therefore be counterbalanced by higher-density areas providing, for instance, smaller units of accommodation or accommodation for the elderly. Strategic Policy HOU3: Affordable Housing states that All market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. An overall balance of 70% of affordable homes to be for rent and 30% to be affordable housing to buy will be sought in order to match the balance of affordable housing need. The precise requirements for tenure of affordable homes will be negotiated on a case-by-case basis, having regard to the viability of individual sites, local need and compliance with other policies of the plan. Schemes of sheltered/extra care housing for social rent/affordable rent to the elderly may be provided to meet affordable housing requirements, in conjunction with a Registered Provider of affordable

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			should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework. Duty to Co-operate 5.13 Paragraph 4.3 of the consultation states: “4.3 National policy also notes that authorities should plan for development needs that cannot be accommodated in neighbouring areas. Blackpool’s housing need has significantly increased as a result of the new standard method, from 147 dwellings per annum to 587 per annum. Blackpool Council is concerned about meeting this annual need due to the highly constrained nature of the Borough. However, Blackpool is currently developing a new Local Plan and, as part of their evidence base, will undertake a Housing Needs Assessment, Green Belt Review, and Housing Land Availability Assessment. These studies will determine how much of the new housing figure Blackpool can accommodate. If the evidence shows that Blackpool cannot meet all of its housing need within its area, Blackpool Council is required to approach both Fylde and Wyre Councils to request whether any of the unmet	housing. Lancashire County Council (LCC) is seeking the development of at least one new extra-care scheme for affordable rent within the Borough in which LCC could place people who have a Care Act assessment and would be available for those people with assessed needs: provision of such a facility on a suitable site would be supported as provision of affordable housing. Affordable housing provided for social rent or affordable rent should be 1, 2 or 3-bedroom homes. Affordable housing to buy should normally be 1 and 2-bedroom homes. The size and type of affordable housing on an individual scheme should be determined with reference to housing needs assessments undertaken by or on behalf of the Council. National policy requires that local plans identify needs and set out policies to provide for the needs of specific groups, including but not limited to those who require affordable housing (including Social Rent) (considered above); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes. Strategic Policy HOU4: Housing for Older People states that the Council will support the

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			need can be accommodated where practical and consistent with achieving sustainable development.” 5.14 The LDS for Blackpool sets out the timetable for their local plan: • Publication Consultation (Regulation 19) – April to June 2029; • Submission to Secretary of State - February 2030; • Examination - March/August 2030; and, • Adoption - February 2031. 5.15 We consider there is no reason why the authorities should not have decided to prepare a joint local plan given the longstanding Fylde Coast Housing Market Area. The current consultation states that it will be for Blackpool to approach Fylde and Wyre “as to whether any of the unmet need can be accommodated where practical and consistent with achieving sustainable development”. In the case of Blackpool, it is clear that they cannot meet the housing needs within its area as the Blackpool SHLAA 2019 identifies a developable supply to satisfy their lower adopted housing requirement to the year 2026 only. These discussions must take place now and be evidenced as part of the DtC. 5.16 It should also be noted that Wyre Council considered that they had an unmet need of 380	development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility.

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			dwelling within its housing requirement when the Partial Review was being examined albeit when their Partial Review was prepared, they were able to accommodate all of its housing needs for the Plan period of 2011-2031. That figure was minor compared to the housing needs now required, hence the need for joint working at this stage as the housing need/requirement and unmet housing need are clearly a strategic matter which require cooperation. Housing Mix 5.17 In terms of housing mix, a 'one size fits all' approach is not appropriate in all cases and any such policy should be flexibility worded to allow for individual schemes to address the need arising in any one particular location: • There should be a focus on a range of house types, sizes and affordability rather than a sole focus on the number of bedrooms. • It is increasingly the case that purchasers demand a flexible additional room so that they can adapt to changing circumstances e.g. study for working from home, guest bedroom and for elderly parents. It is often the case that a 4-bedroom property (flexible 4th bedroom) is of a similar size and affordability to a 3-bedroom property but there is much stronger demand for the former. • Any reliance on a SHMA often projects forward past trends rather than reflecting aspirations e.g.	

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			people may have had no option but to live in a 2-bedroom property due to a lack of choice in the housing market but they actually want to live in a 3-bedroom property. • It may be the case that larger family-sized accommodation is needed to address other structural issues such as a contracting working age population or help sustain rural communities e.g. primary schools. • It may be that higher density development is appropriate in inner urban locations and lower density is suitable to the edge-of-settlements locations.	
Environment Agency	We have no specific comments to make on the intricacies of housing provision across Fylde, whether this be the minimum requirement or potentially more, given the Duty to Co-operate process. We wish to remind the council of the following that should be considered in all instances: - In line with Fylde's proposed Vision of providing housing in	n/a	n/a	There are small areas of the Borough where individual streams enter the estuary where coastal flooding can potentially occur. This particularly affects some built-up areas within Lytham. Otherwise, the Environment Agency's flood high risk zones affect land surrounding major watercourses, the risk coming from fluvial flooding. The areas falling into the high risk zones are shown on the Environment Agency's Flood Map for Planning. It has been assumed that all allocated sites that are potentially at some risk of surface water flooding. The Council has therefore commissioned a Level 2 Strategic Flood Risk Assessment, in support of the Local Plan, to ensure that completed developments will not be at risk of flooding.

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	sustainable locations, in relation to our remit we would recommend that: • New homes must not be located in Flood Zone 3b. • New homes must avoid areas of Flood Zone 2 and 3 unless there are no sequentially preferable sites at a lower risk of flooding AND the site satisfies the requirements of the Exception Test (if necessary). • New homes should not be located in areas where climate change could unacceptably increase flood risk, such as those in Flood Zone 1 but the LPA's strategic flood risk assessment (SFRA) or the flood map for planning show it will be at increased risk of flooding from rivers or the sea in future. • New homes (and private gardens) should			Where an area of a site is at flood risk, development that is vulnerable to flooding should be directed to the parts of the site that are not affected. As well as the potential for flood risk on site, development sites that are not themselves at risk of flooding can have the effect of contributing to increased flooding elsewhere, through increased runoff from the site. Attenuation measures through a sequential approach will be required to eliminate impact. Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency proposes that all new development is required to minimise flood risk impacts on the environment, retain water quality and water efficiency, and mitigate against the likely effects of climate change on present and future generations. This will be achieved by: a) Ensuring that development incorporates the most sustainable form of managing surface water in accordance with Policy CCH2. b) Supporting the retrofitting of SuDS in locations that generate surface water run-off. c) Improving water efficiency standards by minimising the use of potable mains water in new development and incorporating measures to recycle and conserve water resources. d) Ensuring that new development is directed away from areas at high risk of flooding and incorporating

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	not be located over or within 8 metres of the bank top of a designated Main River. - Any watercourses on sites should be retained and the layout of new homes should ensure that watercourses are utilised as a key feature or benefit. Where possible, they should be improved to provide biodiversity net gains in the aquatic environment. Careful site design should avoid development along the edges of watercourses to retain a natural habitat corridor along watercourses and future climate resilience. - The re use of previously developed sites provides opportunities for sites to be cleaned up and remediated making them safe for future users and reducing			appropriate mitigation against flooding in areas of lower risk. e) Ensuring that watercourses, which require watercourse consent are protected from encroachment and adverse impacts and that water quality is maintained and improved. f) Seeking to maximise the potential of the Green Infrastructure network within developments to reduce the risk of flooding. g) Ensuring that new development does not adversely affect the quality of surface and groundwater resources in Source Protection Zones and where possible contributes towards improving it. h) Ensuring there is no risk of pollution to controlled waters from land contamination on previously developed sites. i) Ensuring that the layout of new sea defences and coastal protection measures are of an appropriately robust design and are fit for purpose. j) Ensuring that wherever necessary land is identified to be used for wetland or flood storage through negotiation with landowners. It is crucially important that surface water from new development does not enter the watercourses, drainage and sewer networks. Surface water from new developments can be discharged into a watercourse subject to an approved Consent from

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	potential pollution risks to the water environment. • Locating homes in areas with better air quality have health and wellbeing benefits, but if large allocations are concentrated in one area, this could create a problem where one does not currently exist by increasing traffic volumes. The importance of Green Infrastructure and buffers to reduce air quality impacts and improve health and wellbeing is essential in these circumstances. • New homes in areas adjacent to existing operations regulated by the Environment Agency may be detrimentally affected by emissions from these activities.			the EA (main river) or LCC (ordinary watercourse). LCC will require evidence to demonstrate that infiltration is not possible before other surface water discharge options will be approved. There is a national hierarchy to which surface water run-off is to be discharged, which is referenced in Planning Practice Guidance (the PPG). Development proposals should robustly demonstrate how foul and surface water will be dealt with by the submission of a drainage strategy accompanying the planning application. The aim is for surface water run-off rates and volumes to be reduced from those that existed prior to development taking place. Watercourses of all types and the areas immediately surrounding them have multiple benefits, from drainage to flood storage and attenuation, providing habitats and providing a landscape feature. The enclosure of watercourses diminishes these benefits greatly and can lead to detrimental effects on biodiversity and flood risk. Policy ENT9 therefore carries a presumption against the culverting or other enclosure of watercourses. Strategic Policy HOU2: Density and Mix of Housing states that Developments will be expected to make efficient use of land, whilst avoiding detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of the surrounding area. It is expected that this will

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				normally result in a minimum net residential density of 30 homes per hectare. The Local Plan aims to improve traffic flow and has highlighted areas of potential concern. There are opportunities within Fylde to improve the provision of routes for cyclists and pedestrians. Many of these are identified in the Fylde Coast Local Cycling & Walking Infrastructure Plan. Further improvement is required to provide safe and convenient footpaths and cycleways in urban, suburban and rural areas. For many local journeys in Fylde, cycling offers an alternative mode of transport to the car. Traffic on main roads discourages cycling but a growing network of cycle routes making use of quiet roads, on-road lanes and off-road cycleways can make cycle journeys safe and convenient.
Gladman	n/a	n/a	4.5.1 The delivery of new housing to meet the needs of all residents across the borough is a critical issue that must be addressed through the emerging Local Plan. The NPPF is clear that the standard method should be used as the starting point in establishing the housing requirement for an area. Gladman notes that the most up-to-date local housing need figure for the authority, defined using the standard method, is 419 dwellings per annum. The PPG sets out that there are some specific circumstances in which an alternative approach to the standard method could be justified¹. Gladman submits that in this case, an	Revisions to the Standard Method show that the existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households

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			alternative approach to the standard method is not justified. As such, there is no reason for the Council not to plan for its housing need defined by the standard method. 4.5.2 The NPPF sets out that a local planning authority can choose to set a housing requirement higher than its identified housing need. For example, this can be to include provision for neighbouring areas or reflect growth ambitions linked to economic development or infrastructure investment. Gladman submits that the Council should consider the merits of planning for higher growth. 4.5.3 The PPG sets out that an increase in the total housing figures included in a plan may need to be considered where it could help deliver the required number of affordable homes². Therefore, the Council could choose to plan for a higher number than its local housing need figure to support the delivery of affordable housing. 4.5.4 Gladman submits that, at a minimum, the Council should plan for its standard method figure and include provision for any agreed apportionment of unmet need. It is essential that any unmet need is included within the housing requirement, rather than treated as 'in addition to', to ensure that it is delivered. Gladman stresses that the standard method should only be	such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. The Council receives a significant number of applications for small site windfalls, which are typically for a small number of additional units through additional new build dwellings on a plot, or conversions to flats. The Housing Background Paper sets out the delivery from small site windfalls over recent years. It concludes that the inclusion of a windfall supply of 40 units per annum is justified, as was the case with the previous Local Plan. This is applied from year 4 of the plan period so as not to double-count commitments from existing planning permissions in years 1 to 3 in the Housing Trajectory.

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			considered the starting point for calculating the new Local Plan's housing requirement. 4.5.5 Gladman contends that the new Local Plan should make provision for more dwellings than the minimum housing requirement for the plan period. It is essential that flexibility is built into the emerging Local Plan to ensure the Council is able to respond positively to changes in circumstances over the plan period. A housing land supply buffer of 10-20% is generally considered suitable to mitigate against delays in delivery as a result of changes in the planning and/or economic context. The housing land supply buffer should be flexible with a diverse range of components to positively respond to delayed delivery and changes in the planning and/or economic context. Furthermore, Gladman recommends the application of a non-implementation rate to ensure the overall provision figure is robust and the minimum housing requirement for the plan period is met in full. 4.5.6 The purpose of the emerging Local Plan is to identify sufficient sites to meet the housing requirement in full. Therefore, Gladman recommends that the Council allocates additional medium- and large-scale sites instead of relying on windfalls to provide greater certainty in meeting its minimum overall housing requirement over the plan period. Additional site allocations would help	In meeting needs it is recognised that some windfalls will occur as at present. However complete reliance on windfalls could lead to unmet need which would then require the granting of permissions on out-of-settlement locations not in accordance with the development strategy. Therefore, Policy HOU10 provides for the meeting of an element of need through delivery of plots on allocated development sites. The existing committed sites will contribute to delivery during the plan period which are shown in the Housing Trajectory.

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			ensure identified housing needs are met in full. Critically, the deliverability of the allocations would be tested by an inspector at examination to ensure they are deliverable over the plan period. 4.5.7 If the Council proposes to carry forward any allocations from the adopted Local Plan that have not come forward for development as yet, Gladman contends that robust evidence must be provided to demonstrate their deliverability.	
Historic England	No comment.	n/a	No comment.	Noted
Home Builders Federation	Policy Issues: Housing Overall Housing Needs 19.The NPPF outlines in paragraph 62 that to determine the minimum number of homes needed, strategic policies should be informed by a Local Housing Need (LHN) assessment, conducted using the Standard Method. In addition to the LHN, any needs that cannot be met within neighbouring areas should also be taken into	n/a	n/a	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under

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	account in establishing the amount of housing to be planned for. 20.The Planning Practice Guidance (PPG) then outlines how to use the Standard Method to calculate the LHN (Reference ID: 2a-004-20241212). 21.Using the most recent affordability data (from March 2025) and the most up to date housing stock information (from May 2025), the HBF calculates the LHN figure for Fylde is 419 dwellings per annum (rather than the 410 dwellings per annum stated in the consultation document). This means over the stated plan period, the new Local Plan should plan for 7,542 dwellings.			government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. Strategic Policy HOU3: Affordable Housing states that All market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has demonstrated that the cost of the affordable

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	22.It should be noted that this is a minimum figure and that the Council may conclude that from its evidence base that a figure which is higher than this is appropriate. The PPG outlines instances where this may be appropriate including where the Council may seek to reflect economic growth aspirations (Reference ID: 2a-040-20241212), where an uplift in the overall housing requirement would assist in the delivery of affordable homes (Reference ID: 2a-024-20190220), or to address a specific demographic issue. Housing Mix 23.The HBF notes there is not a specific question in relation to this. The consultation document			housing provision would prevent the development from being delivered. The Fylde Housing Needs Survey 2022 (HNS) provides a clear indication of the sizes and types of affordable housing needed. The HNS sets out a net need for affordable housing of 593 units per annum, made up of 418 units of affordable housing to rent (social rent, affordable rent) and 175 units of affordable housing to buy (shared ownership, discount market sales housing, rent-to-buy). However, it qualifies this by noting that the relationship between affordable housing need and overall need for new dwellings is complex and that the two cannot be arithmetically linked, because many of those who fall into housing need are the result of churn in the private rented sector (principally through the threat of homelessness arising from the end of a tenancy). If the models are rerun to exclude those already in accommodation (and who would therefore release the accommodation by taking up a new home), the need becomes 85 units of affordable housing to rent per annum, and -43 units of affordable housing to buy. Although this approach provides a reality check to the extremely large numbers identified as net need, it is necessary to adopt an approach that recognises the Council's duties in respect of those households presenting who are in priority need, and the overall objective of meeting the needs for all types of households.

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	mentions the 2022 Fylde Housing Needs Survey (HNS). This document will need to be updated in line with the latest data and Government policy to help inform the new Local Plan. 24.The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy that does emerge is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements. This flexibility needs to also take into account the location and character of specific sites, as well as			Strategic Policy HOU2: Density and Mix of Housing states that A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Sites of 10 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 30% of housing units as affordable housing, in accordance with Policy HOU3. Sites of 20 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 20% of housing units designed specifically to accommodate older people, in accordance with Policy HOU4. Sites encompassing 50 or more dwelling plots (including parts of such sites where

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	commercial, market and viability considerations. 25.The updated evidence base should also examine affordable housing need to inform a future Local Plan policy and should include the impact of such policies on the viability of development. As outlined above, it should be noted that the PPG states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes (Reference ID: 2a-024-20190220).			allocated sites are delivered in phases or by multiple developers) will be required to provide 4% of the total number of dwellings on the site through unbuilt serviced plots for custom- and self-build housing, in accordance with Policy HOU10.
Lichfields for Taylor Wimpey	n/a	n/a	Policy Issues: Housing Taylor Wimpey notes the reference to increasing the adopted housing requirement in the Consultation Document from 305 dwellings per annum (dpa) to 410 dpa, in line with updated government policy. However, the latest Standard	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and

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			Method figure for Fylde is 419 dwellings per annum, not 410 as set out in the consultation. The Standard Method figure for each LPA is updated annually and generally increases slightly in most areas. As such, Taylor Wimpey would advocate that the Council should plan to deliver at least 440 dpa over the next plan period to ensure a change in the requirement is not required closer to the Examination of the Plan. This adjustment would result in a total requirement of 6,600 homes over a 15-year plan period, or 7,920 homes over the proposed 2024–2042 plan period. Should the Council seek to pursue ambitions for greater economic growth, the housing requirement should be increased accordingly to ensure alignment between housing delivery and employment growth. The Local Housing Need (LHN) figure represents a baseline minimum, and Taylor Wimpey would welcome a growth-led approach to the emerging Local Plan, including the potential for over-delivery of housing targets. The Planning Practice Guidance (PPG) remains a material consideration in this context, particularly where the Council may seek to uplift its housing requirement to reflect economic growth ambitions (Reference ID: 2a-040-20241212). External factors may also become increasingly apparent if Blackpool Council seeks to accommodate its unmet housing need within Fylde and Wyre. This	older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would

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			further reinforces the need for Fylde to pursue a new Local Plan, underpinned by an up-to-date and robust evidence base. Taylor Wimpey agrees that sites within the existing supply can reasonably be carried forward into the new plan period. However, the continued reliance on large strategic sites that have stalled or experienced significant delays in delivery must be comprehensively assessed prior to their continued inclusion. The Council must ensure that the emerging Local Plan includes a sufficient supply of new residential allocations, which will help safeguard against speculative applications particularly in the context of the presumption in favour of sustainable development. Housing Mix While the Consultation Document does not pose specific questions regarding housing mix, Taylor Wimpey strongly supports the delivery of a diverse range of housing types, sizes, and tenures. Sites capable of delivering diverse housing mix should be afforded significant weight in the site selection process for the emerging Local Plan. The submitted Delivery Statement illustrates how Taylor Wimpey's Land at Weeton Road can accommodate a wide range of market and affordable housing. The Consultation Document raises concerns about	mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. Strategic Policy HOU2: Density and Mix of Housing proposes that a broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen

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			certain aspects of the Fylde Housing Needs Survey (2022), particularly regarding the specific breakdown of needs for affordable housing tenure. It is imperative that the Council maintains an up-to-date and robust evidence base to inform its Local Plan, and that this evidence is subject to regular review. Moreover, this evidence should be transparent and accessible to developers, ensuring clarity around policy requirements and enabling proposed developments to respond effectively to identified local needs. In all cases, particular weight should be given to sites that can best deliver the required level of affordable housing, based on the most current and locally relevant data. That said, Taylor Wimpey would strongly advocate against overly prescriptive housing mix policies which have an impact on viability and delivery rates.	will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Sites of 10 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 30% of housing units as affordable housing, in accordance with Policy HOU3. Sites of 20 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 20% of housing units designed specifically to accommodate older people, in accordance with Policy HOU4. Sites encompassing 50 or more dwelling plots (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 4% of the total number of dwellings on the site through unbuilt serviced plots for custom- and self-build housing, in accordance with Policy HOU10. Strategic Policy HOU3: Affordable Housing proposes that all market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. For further information

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				regarding the on-site provision, tenure, size and type, and viability of affordable housing, please refer to Strategic Policy HOU3.
National Highways	Q17. WSP suggest that National Highways are neutral to the number of homes per year but advise that delivery of all homes should be supported by the appropriate assessments and infrastructure requirements (please see further comments below).	n/a	Q18. The proposed increase in housing delivery to 410 homes per year, with potential additional provision through the Duty to Co-operate, may have implications for transport infrastructure, particularly the SRN at M55 Junctions 3 and 4. It is recommended that the LP be supported by an updated Infrastructure Delivery Plan that specifically addresses transport impacts. This should include cumulative modelling of traffic flows and junction capacity, particularly at M55 Junctions 3 and 4, and ensure that any new or intensified allocations are assessed for their proximity to the SRN. The Plan should also promote sustainable site selection, reducing the need to travel as part of Travel Demand Management (TDM) with promotion of active travel connectivity, and public transport access to ensure the resilience and safe operation of the SRN. Where cross-boundary housing provision is considered, infrastructure coordination with adjacent authorities will be essential to maintain network efficiency and align with the principles of DfT Circular 01/2022. Comment 5-02 Whilst the Housing Mix policy primarily addresses demographic and affordability concerns, it is recommended that the council	Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added

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			update National Highways on the spatial distribution of new housing, particularly large developments which could influence traffic patterns near the SRN, especially around M55 Junctions 3 and 4.	once the Statement of Common Ground has been agreed. Infrastructure comprises physical assets providing for a wide range of supporting service provision including transport: footways, cycleways, highways, airports, railways, tramways, bus stops, bridleways, coach parking and park and ride. Strategic Policy IFR3: Protection of Strategic National Infrastructure states that the new Local Transport Plan is in the early stages of production. Following its completion, it is anticipated that a new transport masterplan will be produced by the local transport authority setting out a programme of strategic transport schemes. The Council will seek to support schemes within the Borough that improve access to and from the Borough to the wider North West region and beyond. Important previously-programmed schemes have been completed, in particular, the Heyhouses to M55 Link Road (Lytham St Annes Way) and Preston Western Distributor Road (Edith Rigby Way) which have resulted in significant reduction in journey times in and out of the Borough by road. Please refer to the policy for key schemes that the Council is seeking to be deliver. Non-Strategic Policy IFR4: Transport Infrastructure Projects shows the transport projects within the Borough.

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Pegasus Group for Rowland Homes	Rowland Homes note the Council's position (as clarified at paragraph 4.2) that: "The latest government policy requires the provision of 410 homes per year. In bringing forward a new/updated Local Plan, it will be essential to plan for the minimum requirement set out by the government." 4.2. Indeed, Paragraph 62 of the December 2024 NPPF makes it clear that the local housing need figure represents the minimum number of homes required (Pegasus emphasis). 4.3. Using the most recent affordability data (from March 2025) and the most up to date housing stock information (from May 2025), the LHN figure for	n/a	n/a	The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. Strategic Policy HOU2: Density and Mix of Housing proposes that a broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or

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	Fylde is now 419 dwellings per annum (rather than the 410 dwellings per annum stated in the consultation document). 4.4. This means over the stated plan period, the new Local Plan should be planning for a minimum of 7,542 dwellings, not the 7,380 homes identified in paragraph 4.2. 4.5. In addition to the LHN, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for in Fylde. This still needs to be established, and it is critical that it is established early in the preparation of this Plan, noting the failure of the			2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Sites of 10 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 30% of housing units as affordable housing, in accordance with Policy HOU3. Sites of 20 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 20% of housing units designed specifically to accommodate older people, in accordance with Policy HOU4. Sites encompassing 50 or more dwelling plots (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 4% of the total number of dwellings on the site through unbuilt serviced plots for custom- and self-build housing, in accordance with Policy HOU10. Strategic Policy HOU3: Affordable Housing proposes that all market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has

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	adopted Fylde Local Plan to account for this previously whilst Wyre and Blackpool established any shortfall in their area. This is needed to ensure compliance with para 11b of the NPPF. 4.6. To achieve the minimum housing figures, there needs to be sufficient flexibility to accommodate changes in the LHS figure between now and the adoption of the Plan and also to ensure flexibility in terms of the overall supply of sites. 4.7. There does not appear to be a specific question covering housing mix, (although Q19-22 cover specific groups) but Rowland Homes would just set out that			demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. a. For residential developments within or in close proximity to the Key Service Centres and Local Service Centres (i.e. the urban areas), the provision of affordable housing will be to meet the requirements identified for borough wide needs. b. For residential developments within rural areas, the provision of affordable housing will be primarily to meet the requirements identified for the closest Tier 1 Larger Rural Settlements: i.e. Newton, Staining and Wrea Green or Tier 2 Smaller Rural Settlements: i.e. Clifton, Elswick, Singleton and Weeton. If, having regard to an agreed assessment, the level of identified local need is less than the equivalent of 30% of the homes proposed, the balance of the provision will be delivered for borough wide needs.

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	the evidence to support any prescribed mix still needs to be developed. Until this is done, Rowland Homes reserve the right to comment on this at the appropriate time. 4.8. In relation to affordable housing, it should be noted that the PPG states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes (Reference ID: 2a-024-20190220). 4.9. To ensure that the housing needs are fully met, including addressing any need from adjacent Boroughs and to deliver the full			

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	affordable housing needs, the potential for a housing figure in excess of LHN needs to be considered as a reasonable alternative through the SA/SEA process, as the Plan progresses.			
PWA Planning for Medicom	5.1. The provision of a sufficient quantity, quality, and mix of new homes is the cornerstone of a sound Local Plan. The policies in this chapter are therefore of paramount importance in delivering the Plan's Vision and meeting the social and economic objectives of sustainable development outlined in the National Planning Policy Framework (NPPF). We advocate for a proactive and ambitious approach to housing delivery that not	n/a	5.2. A strategy that merely aims for the bare minimum housing target is inherently risky and fails to plan for predictable contingencies. We recommend a higher figure for three principal reasons, which align with the tests of soundness in the NPPF: 1. Providing a Delivery Buffer: The NPPF's core objective is to "significantly boost the supply of homes". Planning for only the minimum target leaves no margin for unforeseen delays in site delivery, changes in market conditions, or sites failing to come forward as anticipated. To ensure the housing requirement is consistently met and to maintain a robust five-year housing land supply, it is prudent and logical to plan for a realistic 'delivery buffer' of at least 10-15% above the minimum figure. This approach helps prevent the Council from falling into a housing land supply deficit, which would trigger the presumption in	The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. In seeking to achieve a sustainable pattern of development, the Council has prioritised locations where access can be provided for all to local facilities and to local jobs, by walking and cycling (active travel) to promote healthy lifestyles and by public transport. Settlement hierarchies classify settlements into groups to indicate their relative facilities, size or importance based on a series of criteria. In making such a classification to inform the Local Plan development strategy, the overriding aim should be to identify those places which are most sustainable.

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	only meets but exceeds the minimum requirements. This is essential to create the policy context in which sustainable, deliverable sites like School Farm, Warton, can come forward to address the borough's significant housing shortfall.		favour of sustainable development and a loss of local control over planning decisions. 2. Proactively Addressing Sub-Regional Need (Duty to Cooperate): The consultation document rightly acknowledges the significant increase in Blackpool's housing need and its highly constrained nature. The Duty to Cooperate requires Fylde to address unmet needs from neighbouring areas "where it is practical to do so". Given that Fylde is demonstrably less constrained than Blackpool and Wyre, it is highly probable that it will be required to accommodate a proportion of their unmet need. A sound plan should anticipate this eventuality and plan for it proactively now, rather than waiting for a formal request which would delay the plan-making process. Taking a proactive stance demonstrates effective joint working and positive preparation. 3. Supporting Economic Ambition: The housing requirement should be aligned with the borough's economic vision. To support the growth aspirations of the Enterprise Zones, particularly BAE Systems at Warton, the Plan must ensure a sufficient supply of housing for the local workforce. A higher housing target is essential for delivering the homes needed to support this dynamic local economy. 5.3. To meet any housing target, whether the	Strategic Policy DST1: The Development Strategy proposes that the Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations will be: - St Annes (including Squires Gate); - Whitehills and Whyndyke; - Warton; and - Kirkham and Wesham. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. There remain sites still to be delivered fully in each of the four strategic locations. The current housing commitments are: - St. Annes (including Squires Gate) 921 units - Whitehills and Whyndyke 2,147 units - Warton 204 units - Kirkham and Wesham 117 units

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			minimum or a more ambitious figure, the Council must allocate a portfolio of deliverable sites. This reinforces the absolute necessity of a Green Belt review to identify sustainable, previously developed 'Grey Belt' sites like School Farm, which are perfectly located to meet these housing needs.	Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum from year 4 of the plan period. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the

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				nationally-important site. Please refer to Strategic Policy DST3: Green Belt for further information. In order that the growth potential can be optimised, there is a need for the site boundary to be revised on the western side in order to provide for growth. This requires a small, non strategic revision to the Green Belt. Exceptional circumstances support this revision as a non strategic change. Given the importance of Warton Aerodrome to national defence and its local and regional importance for employment and economic development, there is a need to continue to support the growth of the Aerodrome to enable BAE Systems to respond quickly to changes in technology or demand for the advanced engineering and testing facilities at the Aerodrome, which may require additional development.
PWA Planning for Pringle Homes	5.1. As a family-owned housebuilder with a 40-year history of delivering high-quality homes in Lancashire, Pringle Homes has a direct interest in ensuring the new Local Plan establishes a positive, ambitious, and deliverable framework for housing. The	n/a	5.3. A strategy that merely aims for the bare minimum housing target is inherently risky and fails to plan for predictable contingencies. Pringle Homes advocates for a higher housing requirement for three principal reasons, which align with the tests of soundness in the NPPF: 1. Providing a Delivery Buffer: The NPPF's core objective is to "significantly boost the supply of homes". Planning for only the minimum target leaves no margin for unforeseen delays in site delivery, changes in market conditions, or sites failing to	The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes.

Respondent name	(17) Should the Local Plan provide for:	Please specify	(18) Please explain your reasoning for the figure you have suggested.	Council Response
	provision of a sufficient quantity, quality, and mix of new homes is the cornerstone of a sound Local Plan. The following representations outline our position on the key housing policy issues, demonstrating how a proactive approach will enable the delivery of exceptional developments like our proposed scheme at Greenlands Farm, Wrea Green. 5.2. Yes, the Local Plan should plan for a higher housing requirement than the 410 dwellings per annum (dpa) minimum derived from the standard methodology. This minimum figure should be treated as the starting point, or floor, for determining the Plan's housing		come forward as anticipated. To ensure the housing requirement is consistently met and to maintain a robust five-year housing land supply, it is prudent and logical to plan for a realistic 'delivery buffer' of at least 10-15% above the minimum figure. This approach helps prevent the Council from falling into a housing land supply deficit, which would trigger the presumption in favour of sustainable development and a loss of local control over planning decisions. 2. Proactively Addressing Sub-Regional Need (Duty to Cooperate): The consultation document rightly acknowledges the significant increase in Blackpool's housing need and its highly constrained nature. The Duty to Cooperate requires Fylde to address unmet needs from neighbouring areas "where it is practical to do so". Given that Fylde is demonstrably less constrained than Blackpool and Wyre, it is highly probable that it will be required to accommodate a proportion of their unmet need. A sound plan should anticipate this eventuality and plan for it proactively now, rather than waiting for a formal request which would delay the plan-making process. Taking a proactive stance demonstrates effective joint working and positive preparation. 3. Supporting Economic Ambition: The housing requirement should be aligned with the borough's economic vision. To support	The Council will monitor the delivery of housing and planning permissions granted to ensure that it maintains a five-year housing land supply based on the annual housing requirement of 416 net dwellings per annum over the plan period. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. Fylde will have continued to develop as a dynamic, prosperous place to live and work through boosting the delivery of sustainable homes and economic growth in accordance with the Local Plan Development Strategy, supported by the necessary facilities, services, infrastructure and access to modern telecommunications. Strategic Objectives for the Local Plan: Objective 3: Promoting a vibrant and healthy economy • Supporting business growth through maintaining employment land supply • Supporting the roles of town centres • Supporting the roles of resorts including protection of assets that contribute to the critical mass of attractions • Supporting growth at strategically important employment sites.

Respondent name	(17) Should the Local Plan provide for:	Please specify	(18) Please explain your reasoning for the figure you have suggested.	Council Response
	requirement, not the ceiling.		the growth aspirations of the Enterprise Zones and retain a skilled workforce, the Plan must ensure a sufficient supply of attractive and available housing. A higher housing target will send a clear signal that Fylde is 'open for business' and is committed to delivering the homes needed to support a dynamic economy. 5.4. To meet any housing target, whether the minimum or a more ambitious figure, the Council must allocate a portfolio of deliverable sites. The Greenlands Farm site, promoted by a developer with a proven track record, represents exactly the kind of "deliverable" site (as defined in Annex 2 of the NPPF) that is immediately available, in a suitable location, and achievable within five years, ready to contribute to the housing supply early in the new plan period.	
PWA Planning	5.1. The provision of a sufficient quantity, quality, and mix of new homes is the cornerstone of a sound Local Plan. The policies in this chapter are therefore of paramount importance in	n/a	5.3. Our reasoning is based on the need for the Plan to be positively prepared, effective, and justified, in accordance with the tests of soundness in the NPPF. A strategy that merely aims for the bare minimum is inherently risky and fails to plan for predictable contingencies. We recommend a higher figure for three principal reasons: 1. Providing a Delivery Buffer: The NPPF's core objective is to "significantly boost	The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the

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	delivering the Plan's Vision and meeting the social and economic objectives of sustainable development outlined in the NPPF. We advocate for a proactive and ambitious approach to housing delivery that not only meets but exceeds the minimum requirements, ensuring the borough has a resilient five-year housing land supply and can respond positively to the needs of all members of the community. 5.2. Yes, the Local Plan should plan for a higher housing requirement than the 410 dwellings per annum (dpa) minimum derived from the standard methodology. This minimum figure should be treated as the starting point, or floor, for		the supply of homes". Planning for only the minimum target leaves no margin for unforeseen delays in site delivery, changes in market conditions, or sites failing to come forward as anticipated. To ensure the housing requirement is consistently met and to maintain a robust five-year housing land supply, it is prudent and logical to plan for a realistic 'delivery buffer' of at least 10-15% above the minimum figure. This approach helps prevent the Council from falling into a housing land supply deficit, which would trigger the presumption in favour of sustainable development and a loss of local control over planning decisions. 2. Proactively Addressing Sub-Regional Need (Duty to Cooperate): The consultation document rightly acknowledges the significant increase in Blackpool's housing need and its highly constrained nature. The Duty to Cooperate requires Fylde to address unmet needs from neighbouring areas "where it is practical to do so". Given that Fylde is demonstrably less constrained than Blackpool and Wyre, it is highly probable that it will be required to accommodate a proportion of their unmet need. A sound plan should anticipate this eventuality and plan for it proactively now, rather than waiting for a formal request which would delay the plan-making process. Taking a proactive stance	plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The Council will monitor the delivery of housing and planning permissions granted to ensure that it maintains a five-year housing land supply based on the annual housing requirement of 416 net dwellings per annum over the plan period. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. Fylde will have continued to develop as a dynamic, prosperous place to live and work through boosting the delivery of sustainable homes and economic growth in accordance with the Local Plan Development Strategy, supported by the necessary facilities, services, infrastructure and access to modern telecommunications. Strategic Objectives for the Local Plan: Objective 3: Promoting a vibrant and healthy economy • Supporting business growth through maintaining employment land supply • Supporting the roles of town centres • Supporting the roles of resorts including protection of assets that contribute to the critical mass of attractions • Supporting growth at strategically important employment sites.

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	determining the Plan's housing requirement, not the ceiling.		demonstrates effective joint working and positive preparation. 3. Supporting Economic Ambition: The housing requirement should be aligned with the borough's economic vision. To support the growth aspirations of the Enterprise Zones and retain a skilled workforce, the Plan must ensure a sufficient supply of attractive and available housing. A higher housing target will send a clear signal that Fylde is 'open for business' and is committed to delivering the homes needed to support a dynamic economy.	
S&L for J Edwards, J Marquis and A Marquis-Carr.	The Local Plan should plan to meet a local housing need of at least 410 (net) dwellings per annum plus an agreed amount of any unmet need arising from Blackpool which cannot be accommodated in Blackpool district.	n/a	The Government has made a series of commitments for fundamental and far-reaching reform of the planning system to deliver 1.5 million homes (300 dpa) before 2029. The December 2024 NPPF and corresponding update to the Planning Practice Guidance is a clear statement of the Government's ambition and intent, and makes clear, at NPPF 62, that the revised and mandated standard method is the only approach which local authorities must use to calculate their minimum local housing need. A local housing need of less than 410 dpa is not justified as it is not in accordance with Government policy and is not sound. The proposed minimum housing need for the new Local Plan must therefore be a figure of 410 homes per year (or higher) and, if necessary, with the	The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The Council will monitor the delivery of housing and planning permissions granted to ensure that it maintains a five-year housing land supply based on

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			addition of an agreed amount of any unmet housing need arising from Blackpool which cannot be accommodated in Blackpool district. A minimum local housing need of 410 (net) dwellings per annum is also in line with the housing requirement of 415 (net) dwellings per year which was planned for up to 2032 in the adopted Local Plan, as it was first adopted in October 2018 and prior to its reduction to 305 dwellings per annum in the Local Plan (incorporating Partial Review) adopted in December 2021. The evidence base for the adopted plan shows that there is sufficient land available in Fylde, including those remaining site allocations which is it appropriate to carry forward, to meet a minimum requirement of 410 (net) dwellings per year (7,380 in total) for the 18 years to 2042, and annual net completion rates show that the market has delivered above this, at an average of 483 new homes per year, over the past seven years.	the annual housing requirement of 416 net dwellings per annum over the plan period. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
S&L for Oakmere Homes	The new Local Plan should plan to meet a local housing need of at least 410 (net) dwellings per annum plus an agreed amount of any unmet need arising from	n/a	The Government has made a series of commitments for fundamental and far-reaching reform of the planning system to deliver 1.5 million homes (300 dpa) before 2029. The December 2024 NPPF and corresponding update to the Planning Practice Guidance is a clear statement of the Government's ambition and intent, and makes clear, at NPPF 62, that the	The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the

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	Blackpool which cannot be accommodated in Blackpool district.		revised and mandated standard method is the only approach which local authorities must use to calculate their minimum local housing need. A local housing need of less than 410 dpa is not justified as it is not in accordance with Government policy and is not sound. The proposed minimum housing need for the new Local Plan must therefore be a figure of 410 homes per year (or higher) and, if necessary, with the addition of an agreed amount of any unmet housing need arising from Blackpool which cannot be accommodated in Blackpool district. A minimum local housing need of 410 (net) dwellings per annum is also in line with the housing requirement of 415 (net) dwellings per year which was planned for up to 2032 in the adopted Local Plan, as it was first adopted in October 2018 and prior to its reduction to 305 dwellings per annum in the Local Plan (incorporating Partial Review) adopted in December 2021. The evidence base for the adopted plan shows that there is sufficient land available in Fylde, including those remaining site allocations which is it appropriate to carry forward, to meet a minimum requirement of 410 (net) dwellings per year (7,380 in total) for the 18 years to 2042, and annual net completion rates show that the market has delivered above this, at an average of 483 new homes per year, over the	up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The Council will monitor the delivery of housing and planning permissions granted to ensure that it maintains a five-year housing land supply based on the annual housing requirement of 416 net dwellings per annum over the plan period. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.

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			past seven years.	
S&L for River Properties	The Local Plan should plan to meet a local housing need of at least 410 (net) dwellings per annum plus an agreed amount of any unmet need arising from Blackpool which cannot be accommodated in Blackpool district.	n/a	The Government has made a series of commitments for fundamental and far-reaching reform of the planning system to deliver 1.5 million homes (300 dpa) before 2029. The December 2024 NPPF and corresponding update to the Planning Practice Guidance is a clear statement of the Government's ambition and intent, and makes clear, at NPPF 62, that the revised and mandated standard method is the only approach which local authorities must use to calculate their minimum local housing need. A local housing need of less than 410 dpa is not justified as it is not in accordance with Government policy and is not sound. The proposed minimum housing need for the new Local Plan must therefore be a figure of 410 homes per year (or higher) and, if necessary, with the addition of an agreed amount of any unmet housing need arising from Blackpool which cannot be accommodated in Blackpool district. A minimum local housing need of 410 (net) dwellings per annum is also in line with the housing requirement of 415 (net) dwellings per year which was planned for up to 2032 in the adopted Local Plan, as it was first adopted in October 2018 and prior to its reduction to 305 dwellings per annum in the Local Plan	The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The Council will monitor the delivery of housing and planning permissions granted to ensure that it maintains a five-year housing land supply based on the annual housing requirement of 416 net dwellings per annum over the plan period. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.

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			(incorporating Partial Review) adopted in December 2021. The evidence base for the adopted plan shows that there is sufficient land available in Fylde, including those remaining site allocations which is it appropriate to carry forward, to meet a minimum requirement of 410 (net) dwellings per year (7,380 in total) for the 18 years to 2042, and annual net completion rates show that the market has delivered above this, at an average of 483 new homes per year, over the past seven years.	
Steven Abbott Associates for Bradkirk Business Park	Housing numbers: My clients have approved the comprehensive representations being made by Lichfields on behalf of Taylor Wimpey.	n/a	n/a	Comments noted.
Turley for Strategic Land Group	1.28 The IVSD acknowledges new national planning policy and confirms that it will be 'essential' to plan for the minimum housing requirement set by government. The latest housing need figures indicate that Fylde will need to be	n/a	n/a	The government requires strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the

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	plan for a minimum of 419 new homes every year throughout the Plan Period (7,542). 1.29 The commitment to plan for this minimum level of new homes is supported by SLG but this level of provision should be considered “at least the minimum” and further evidence work be undertaken to see if more homes are required to meet economic growth strategies and deliver the necessary level of affordable housing. While the Borough does have some existing allocations and commitments that will continue to be built out beyond the current Local Plan period, there will be a need to identify additional land allocations to meet			plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The Council will monitor the delivery of housing and planning permissions granted to ensure that it maintains a five-year housing land supply based on the annual housing requirement of 416 net dwellings per annum over the plan period. National policy notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site.

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	development needs for housing. 1.30 The IVSD also acknowledges that national planning policy requires authorities to plan for development needs that cannot be accommodated in neighbouring areas. It identifies that Blackpool's housing need has significantly increased and Blackpool Council is concerned about how it will meet this annual need due to the highly constrained nature of the Borough. 1.31 The scale of constraint within Blackpool is significant and their own land capacity evidence that there is land capacity (as at 2019) to deliver only 2,329 new homes. The previous Local Plan sought to accommodate housing			

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	need from Blackpool and it is inevitable that a request from Blackpool will be forthcoming. Given the proximity of the Whitehills-Whyndyke SDL to Blackpool, it will be sustainability well placed to accommodate such needs. 1.32 Moreover, the previous Local Plan had a commitment to undertake an early review to examine the issue of unmet need in Wyre as it is itself constrained by flood risk, Green Belt and highway capacity. Wyre's housing need has also increased significantly (from 280 to 582 homes per year). 1.33 The amount of housing that Blackpool and Wyre can accommodate will be determined			

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	through the preparation of their respective new Local Plans but their timetable for preparation lags behind the Local Plan timetable being progressed by Fylde. 1.34 It is SLG's view that out of the three authorities, it is Fylde – while acknowledging its own constraints, that is the Borough which has most capacity (particularly at Whitehills and Whyndyke) to absorb development needs from Blackpool and Wyre. It will be crucial therefore that positive engagement and collaboration is undertaken between all three authorities to ensure that any surplus housing needs are adequately planned for across this sub-region.			

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United Utilities	Site-Specific Policies for Allocations When considering the format of your emerging development plan, we request that your site allocations are guided by detailed site-specific policies / site-specific development requirements. This can be critical to ensuring that the issues which are identified via the site selection process are clear to applicants. When you have sites available for assessment, UUW will be able to highlight any issues for consideration as part of an initial site assessment. For example, large on-site infrastructure which is material to site layout, or the location of a site in a groundwater source protection zone, which may mean that a site	n/a	UUW wishes to highlight the need for early dialogue on potential housing sites so that infrastructure constraints can be understood as soon as possible. UUW believes that significant value can be added to the planning system by ensuring that all sites are identified as site-specific allocations wherever possible. UUW believes that a site-specific allocation and associated policy has added benefit as it allows us to undertake early site-specific assessment to identify any key constraints and risks, for example, an on-site flood risk or a known infrastructure constraint. Such an approach also makes expectations clearer to developers.	During the call for sites process and SHELAA exercise, each site was assessed by suitably, available and achievable to ensure that sites are sustainable and deliverable. The Council's approach to the Local Plan is to include site specific policies which will include information such as site drainage requirements. Strategic Policy HOU10: Custom and Self-Build Homes will ensure that Development sites encompassing 50 or more dwelling plots (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 4% of dwellings (rounded up where applicable) as unbuilt serviced plots, for sale to people seeking custom- or self-build a dwelling for themselves to live in. Please refer to Policy for further information. The Council will apply Policy respectfully for small and medium builders to align with size. The Council has shared information with United Utilities on site allocations to facilitate discussions prior to the production of the plan.

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	needs to be further assessed so that any potential impact on the groundwater environment and public water supply can be appropriately reduced / mitigated. We believe that the identification of such site-specific constraints is critical and therefore, we recommend that your development plan includes these details as site-specific policy / development considerations for all new allocations. UW also wishes to note a preference to see specific allocations identified as part of the new local plan in preference to a reliance on windfall sites. This helps to add certainty for infrastructure providers.			

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	Providing Self and Custom Build Housing Plots When making provision for self and custom build housing plots we request that you include specific policy that ensures a co-ordinated approach to the delivery of on-site infrastructure. There is a risk that such sites can be delivered in a fragmented manner if not carefully controlled. We request that any development of such sites is governed by policy that requires a site-wide infrastructure strategy for foul, surface water and clean water. This will help to ensure that such sites are delivery sustainably. Encouraging Small and Medium-sized Builders			

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	When making provision for small and medium sized builders, we wish to highlight that such small to medium sized sites often discharge surface water to the public combined sewer which is the least sustainable option for the management of surface water. We request that your site selection process for such sites ascertains the proposed approach to managing surface water from landowners so that sites which have more sustainable alternatives than the public combined sewer are prioritised for allocation.			

Respondent name	(19) What views do you have on how the new Local Plan should provide for older people's housing?	(20) What views do you have on how the new Local Plan should provide for looked-after children and adults with care support? What controls should the new local plan seek to introduce?	Council Response
Alban Cassidy	Provision for older person's housing should be supported where this is viable.		Sites of 20 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 20% of housing units designed specifically to accommodate older people, in accordance with Policy HOU4. Please refer to Strategic Policy HOU4: Housing for Older People for further information.
Anna Briggs	More care homes from charities and local businesses and fewer operated by big tax-dodging chains.		The Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility.
Bryning with Warton Parish Council	There should be planning for older people	There should be planning for these people but with controls as to where they are located to avoid exacerbating potential issues	Sites of 20 or more dwellings (including parts of such sites where allocated sites are delivered in phases or by multiple developers) will be required to provide 20% of housing

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			units designed specifically to accommodate older people, in accordance with Policy HOU4. Refer to Strategic Policy HOU4: Housing for Older People for further information. Strategic Policy HOU5: Housing for Looked-After Children proposes that the Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a local concentration of such homes would result. Refer to Strategic Policy HOU5 for further information. Refer to Strategic Policy HOU6: Housing for Adults Requiring Care, Support or Management for further information.
David Chedd	It needs to be integrated into the community. Old people do not thrive when concentrated into their own exclusive enclaves.	Press central government to take action to deal with the causes of so many children needing to be looked-after.	The Council will take this forward. The Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require

Respondent name	(19) What views do you have on how the new Local Plan should provide for older people's housing?	(20) What views do you have on how the new Local Plan should provide for looked-after children and adults with care support? What controls should the new local plan seek to introduce?	Council Response
			or involve the loss of an existing community facility. Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people. Regarding question 20, the Council will take this forward. An emerging issue has been the need to plan for accommodation for looked-after children. Fylde has a disproportionate number of looked-after children in residence, many of whom are from outside Lancashire. Disproportionate numbers put pressure on agencies in the Borough and can result in issues in the locality.
Emma Swindells	Outside of St Annes and Lytham the infrastructure isn't in place so would be isolated		The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of

Respondent name	(19) What views do you have on how the new Local Plan should provide for older people's housing?	(20) What views do you have on how the new Local Plan should provide for looked-after children and adults with care support? What controls should the new local plan seek to introduce?	Council Response
			employment land will be located in the four Strategic Locations for development. The four Strategic Locations will be: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Strategic Policy HOU4: Housing for Older People proposes that the Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility.
Ethan Ellison	Fylde is an ageing borough but always has been. It is important for policies to reflect this demographic and recognise the changing tenures and innovative housing for older populations.	The plan should provide for fair distribution to put the right facilities in the right place and not be centralised.	Strategic Policy HOU4: Housing for Older People acknowledges this and will take this forward: Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units

Respondent name	(19) What views do you have on how the new Local Plan should provide for older people's housing?	(20) What views do you have on how the new Local Plan should provide for looked-after children and adults with care support? What controls should the new local plan seek to introduce?	Council Response
			designed specifically to accommodate older people. Regarding question 20 Strategic Policy HOU5 acknowledges this and proposes that The Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a local concentration of such homes would result. The Council will require all proposals for children's care homes to demonstrate that they will not have adverse impacts on the amenity of neighbours and the locality. It will be expected that sites are suitably chosen to avoid such impacts. Strategic Policy HOU6 Housing for Adults Requiring Care, Support or Management states that the housing needs of people with disabilities to be assessed and the size, type and tenure of accommodation required to be established and planned for.
Frank Andrews	yes smaller properties with smaller gardens should be given consideration especailly if near or within easily accessible transport distance	follow established best practice	Comment noted. Regarding question 20 the Council acknowledges this. Please refer to Strategic Policy HOU5: Housing for Looked-After Children and Strategic Policy HOU6:

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			Housing for Adults Requiring Care, Support or Management for further information.
Gerard Malone	Good idea. Housngstock for downsizing too!	less enthusiastic about this. We need houses for local people or even people who want to move to the area. We don't need our stock populated with HMOs of any type.	The Local Plan will promote a mix of new dwellings, including smaller properties that may be suitable for those who are downsizing. In addition, Strategic Policy HOU4: Housing for Older People proposes that residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3 which may include: - True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace - Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of dwellings released, in accordance with Planning Practice Guidance

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			- Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats - Other types of specialist accommodation built to M4(3). It is agreed that the Local Plan should plan for a mix of housing types to meet the needs of local people and those moving into the area. However, an emerging issue has been the need to plan for accommodation for looked-after children. Fylde has a disproportionate number of looked-after children in residence, many of whom are from outside Lancashire. Disproportionate numbers put pressure on agencies in the Borough and can result in issues in the locality. Strategic Policy HOU5: Housing for Looked-After Children proposes that where subject to planning control, the Council will grant planning permission for development or change of use to housing for looked after children only where it is demonstrated that the development will meet unmet needs of children from Lancashire. The Council will consult the Care Commissioners in

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			ascertaining whether the accommodation proposed will meet such needs. The Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a local concentration of such homes would result. Strategic Policy HOU6: Housing for Adults Requiring Care, Support or Management proposes that proposals for the provision of residential units providing supported housing units for adults with support needs commissioned by the responsible authority will be supported in principle where it is shown that it is needed for adults with support needs from Fylde, with support for the application from the Care Commissioners, subject to other policies of the plan.
Hannah Dell'Armi	I think it should as well as for first time buyers. All the applications I see are for 4/5 bed houses which are not affordable	I think they should be in areas that can support them with the infrastructure and support they need, far too many of them are in rural areas	The need for a mix of house types including smaller property types and affordable housing will be addressed in the new Local Plan. Regarding question 20, Strategic Policy HOU5: Housing for Looked-After Children proposes that where subject to planning control, the

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			Council will grant planning permission for development or change of use to housing for looked after children only where it is demonstrated that the development will meet unmet needs of children from Lancashire. The Council will consult the Care Commissioners in ascertaining whether the accommodation proposed will meet such needs. The Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a local concentration of such homes would result. Strategic Policy HOU6: Housing for Adults Requiring Care, Support or Management proposes that proposals for the provision of residential units providing supported housing units for adults with support needs commissioned by the responsible authority will be supported in principle where it is shown that it is needed for adults with support needs from Fylde, with support for the application from the Care Commissioners, subject to other policies of the plan.

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			It is noted that the overall focus of development will be on four strategic locations, with more limited development outside of these.
Hilary Ayling	Much more monitored independent living housing (from converting existing buildings as mentioned in the previous section) would be a great option for elderly who are able to stay active longer, but have community around them. Those that need care need more affordable options, especially in Kirkham and Wesham.		(19) Strategic Policy HOU4 Housing for Older People proposes that the Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility. The Plan proposes to deliver an overall total of 117 housing units within Kirkham and Wesham, including housing for older people. Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3

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			which may include: • True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace; • Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of dwellings released, in accordance with Planning Practice Guidance; • Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats; and/or • Other types of specialist accommodation built to M4(3).
Irene Jacques	There are already many care homes in the area.	Control numbers.	Fylde has an aged and ageing population and as such it is important that appropriate accommodation is provided in sustainable locations. Strategic Policy HOU4: Housing for Older People proposes that the Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require

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			or involve the loss of an existing community facility. With regards to question 20 the Council acknowledges this. Strategic Policy HOU5: Housing for Looked-After Children states that where subject to planning control, the Council will grant planning permission for development or change of use to housing for looked after children only where it is demonstrated that the development will meet unmet needs of children from Lancashire. The Council will consult the Care Commissioners in ascertaining whether the accommodation proposed will meet such needs. The Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a local concentration of such homes would result. The Council will require all proposals for children's care homes to demonstrate that they will not have adverse impacts on the amenity of neighbours and the locality. It will

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			be expected that sites are suitably chosen to avoid such impacts. Strategic Policy HOU6: Housing for Adults Requiring Care, Support or Management proposes that proposals for the provision of residential units providing supported housing units for adults with support needs commissioned by the responsible authority will be supported in principle where it is shown that it is needed for adults with support needs from Fylde, with support for the application from the Care Commissioners, subject to other policies of the plan.
John Leadbeater	Not by building on the green belt.	No views	(19) As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde.
John Maskell	All developments should include smaller houses - starter homes and houses for older people.	Individuals needing support should be housed in the larger towns/villages where there is access to transport, medical facilities, shops	Strategic Policy HOU2: Density and Mix of Housing proposes that developments will be expected to make efficient use of land, whilst avoiding detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of the surrounding area. It is expected that this will normally

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			result in a minimum net residential density of 30 homes per hectare. A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. Please also refer to Strategic Policy HOU3: Affordable Housing and Strategic Policy HOU4: Housing for Older People for further information. The main focus of development will be on four strategic locations that can support strategic development. Strategic Policy HOU5: Housing for Looked-After Children states that where subject to planning control, the Council will grant planning permission for development or

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			change of use to housing for looked after children only where it is demonstrated that the development will meet unmet needs of children from Lancashire. The Council will consult the Care Commissioners in ascertaining whether the accommodation proposed will meet such needs. The Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a local concentration of such homes would result. The Council will require all proposals for children's care homes to demonstrate that they will not have adverse impacts on the amenity of neighbours and the locality. It will be expected that sites are suitably chosen to avoid such impacts. Strategic Policy HOU6: Housing for Adults Requiring Care, Support or Management proposes that proposals for the provision of residential units providing supported housing units for adults with support needs commissioned by the responsible authority will be supported in principle where it is shown that it is needed for adults with

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			support needs from Fylde, with support for the application from the Care Commissioners, subject to other policies of the plan.
Keith McKay	Probable need for more sheltered accommodation for this area.	We are already reaching saturation in Freckleton. This is aggravated when the applications that do appear come from non-accredited suppliers of this type of accommodation. Is it appropriate in a population dominated by older people, at least to the extent planned?	Strategic Policy HOU4: Housing for Older People proposes that residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3 which may include: extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats. Strategic Policy HOU3: Affordable Housing proposes that schemes of sheltered/extra care housing for social rent/affordable rent to the elderly may be provided to meet affordable housing requirements, in conjunction with a Registered Provider of affordable housing. Lancashire County Council (LCC) is seeking the development of at least one new extra-care scheme for affordable

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			rent within the Borough in which LCC could place people who have a Care Act assessment and would be available for those people with assessed needs: provision of such a facility on a suitable site would be supported as provision of affordable housing. Freckleton has not been taken forward as a strategic location in the previous Local Plan, mainly due to the green belt constraint. The green belt remains a constraint to development. The Council will protect of existing services and facilities including heritage assets. Strategic Policy HOU5: Housing for Looked-After Children proposes that where subject to planning control, the Council will grant planning permission for development or change of use to housing for looked after children only where it is demonstrated that the development will meet unmet needs of children from Lancashire. The Council will consult the Care Commissioners in ascertaining whether the accommodation proposed will meet such needs. The Council will take into account the local pattern of existing children's care facilities and

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			will not grant planning permission where a local concentration of such homes would result. The Council will require all proposals for children's care homes to demonstrate that they will not have adverse impacts on the amenity of neighbours and the locality. It will be expected that sites are suitably chosen to avoid such impacts. Strategic Policy HOU6: Housing for Adults Requiring Care, Support or Management proposes that proposals for the provision of residential units providing supported housing units for adults with support needs commissioned by the responsible authority will be supported in principle where it is shown that it is needed for adults with support needs from Fylde, with support for the application from the Care Commissioners, subject to other policies of the plan.
Linda Nulty	More bungalows in new developments and smaller properties	WE MUST provide for local Social need - children and older people. I have NO problem with either.	Strategic Policy HOU4: Housing for Older People proposes that the Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St

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			Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility. Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3 which may include: • True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace; • Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of dwellings released, in accordance with Planning Practice Guidance; • Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats; and/or • Other types of specialist accommodation built to M4(3).

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			Comment noted. The Local Plan will contain policies on housing for looked-after children and adults requiring care.
Lytham St Annes Civic Society	There is an on-going issue in Lytham St Annes where bungalows are being redeveloped in to much larger homes. This is effectively removing from the market properties that older people would be able to down size to. The increase in the number of second homes must be considered before it becomes a real issue – again it is potentially taking properties out of the market which older people may choose to down size to.	Looked after children from beyond the region is becoming an issue because of the difference in housing costs around the country. Any provision for looked after children should be for children from the region for the good of the children themselves.	The Council acknowledges this. Through the Local Plan, the Council will promote a mix of house types on new housing developments. Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3. This may include true bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace. An emerging issue has been the need to plan for accommodation for looked-after children. Fylde has a disproportionate number of looked-after children in residence, many of whom are from outside Lancashire. Disproportionate numbers put pressure on agencies in the Borough and can result in issues in the locality.

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			Strategic Policy HOU5: Housing for Looked-After Children proposes that where subject to planning control, the Council will grant planning permission for development or change of use to housing for looked after children only where it is demonstrated that the development will meet unmet needs of children from Lancashire. The Council will consult the Care Commissioners in ascertaining whether the accommodation proposed will meet such needs. The Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a local concentration of such homes would result. The Council will require all proposals for children's care homes to demonstrate that they will not have adverse impacts on the amenity of neighbours and the locality. It will be expected that sites are suitably chosen to avoid such impacts.
Marcus Dowling	It is a need that very much requires addressing	None	The Council acknowledges this. Further information can be found in Strategic Policy HOU4: Housing for Older People.

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			Comment noted.
P Stanford	There should be the same allocation for “older” peoples homes (2 bed bungalows for say over 55's) as exists for first time buyers. (this is done in other parts of Lancashire already) We simply don't need more 4/5 bed luxury houses around here – possibly need over 55's type projects away from St Annes area ? – that might attract people to free up some bigger properties ?	Something REALLY needs to be done to control the number of applications for looked after children being parachuted into existing established communities. Applications for change of use have popped up almost everywhere. It's a sign of a broken system and society. Government / LCC seem to be clueless – otherwise we'd have a decent policy ? Might suggest that private companies are benefitting significantly due to this lack of direction ? Might suggest that looked after children should only be placed into the local authority from which they originate eg – Children from Wigan / Blackpool should NOT be parachuted into Fylde. That way there is chance of then maintaining their friendship groups etc to provide stability.	The Council acknowledges a need for a mix of smaller and affordable house types and housing for older people as part of new residential developments. However, there is no evidential basis for a moratorium on larger house types as part of an overall site mix where this is appropriate and justified. Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3 which may include: True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace. • Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of dwellings released, in accordance with Planning Practice Guidance; • Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the

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		Unless, of course it is determined that it's not safe to do so.	number of individual flats; and/or • Other types of specialist accommodation built to M4(3). Strategic Policy HOU4: Housing for Older People proposes that the Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility. An emerging issue has been the need to plan for accommodation for looked-after children. Fylde has a disproportionate number of looked-after children in residence, many of whom are from outside Lancashire. Disproportionate numbers put pressure on agencies in the Borough and can result in issues in the locality. In many cases, small units have been found not to represent material change of use from a dwellinghouse, and therefore cannot be subject to planning control. Applications for certificates of lawful use must be determined

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			in accordance with the law and are not matters where policy can apply. Whilst it is clear that there are limits to what can be achieved through planning control, where planning permission is required, in the interests of the children it is undesirable for further placements from outside Lancashire to be housed within Fylde. Policy HOU5 therefore sets a local needs test. Additional criteria requiring no harm to amenity are also included. Strategic Policy HOU5: Housing for Looked-After Children proposes that Where subject to planning control, the Council will grant planning permission for development or change of use to housing for looked after children only where it is demonstrated that the development will meet unmet needs of children from Lancashire. The Council will consult the Care Commissioners in ascertaining whether the accommodation proposed will meet such needs. The Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a

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			local concentration of such homes would result. The Council will require all proposals for children's care homes to demonstrate that they will not have adverse impacts on the amenity of neighbours and the locality. It will be expected that sites are suitably chosen to avoid such impacts.
Philip Bickerstaff	Areas of land for single storey housing should be made available for older people's housing		Strategic Policy HOU4: Housing for Older People proposes that The Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility. Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55

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			years of age, in accordance with Policy HOU3 which may include: True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace. • Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of dwellings released, in accordance with Planning Practice Guidance; • Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats; and/or • Other types of specialist accommodation built to M4(3).
Stephen and Jacqueline Croft	Agree. However, this housing should not be "shoe boxes". Older people are still active, want to garden, have a car that needs garaging, want a home that they feel is appropriate and not a downgrade from their current, larger, home. They still appreciate space around them and don't like to feel hemmed in by housing being too close to one another. They want (and need) good local facilities that are easy to walk to and have community facilities that provide social	A sensible balance and spread of such accommodation is what is needed. Not to have them centered in one area like 'institutions' of the past. Again, it is not about number of units driving the plan but about building a dignified way of life and creating places people can love.	Strategic Policy HOU4: Housing for Older People proposes that the Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility.

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	events for them to take part in. Care homes also need to reflect these desires.		Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3 which may include: True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace. • Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of dwellings released, in accordance with Planning Practice Guidance; • Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats; and/or • Other types of specialist accommodation built to M4(3). (20) Strategic Policy HOU5: Housing for Looked-After Children proposes that where subject to planning control, the Council will grant planning permission for development or change of use to housing for looked after children only where it is demonstrated that

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			the development will meet unmet needs of children from Lancashire. The Council will consult the Care Commissioners in ascertaining whether the accommodation proposed will meet such needs. The Council will take into account the local pattern of existing children's care facilities and will not grant planning permission where a local concentration of such homes would result. The Council will require all proposals for children's care homes to demonstrate that they will not have adverse impacts on the amenity of neighbours and the locality. It will be expected that sites are suitably chosen to avoid such impacts. Strategic Policy HOU6: Housing for Adults Requiring Care, Support or Management proposes that proposals for the provision of residential units providing supported housing units for adults with support needs commissioned by the responsible authority will be supported in principle where it is shown that it is needed for adults with support needs from Fylde, with support for

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			the application from the Care Commissioners, subject to other policies of the plan.
Steven Abbott	Specific policy is needed to promote the provision of specialist housing for older people for all tenure types. This should be realistic about what old means in the 21st century. Residential care homes should be given specific support and the accommodation is not treated within overall housing provision but added to it. Only sustainable locations should be proposed.		(19) Strategic Policy HOU4: Housing for Older People proposes that the Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility. Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3 which may include: True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace. • Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of

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			dwellings released, in accordance with Planning Practice Guidance; • Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats; and/or • Other types of specialist accommodation built to M4(3).
Susan Lee	Alms housing development	In areas of accessibility to services such as bus routes	Comments noted. It is agreed that the Local Plan should support sustainable development, including access to bus services where possible. The Plan strategy will be to focus the majority of development on the strategic locations of St Annes (including Squires Gate), Whitehills and Whyndyke, Warton and Kirkham and Wesham. Strategic Policy ECD7: Town, District, Local and Neighbourhood Centres states that developments outside town centres will be required to maximise the potential for access by active travel and by public transport, through siting of principal or only customer entrances adjacent to existing local public pedestrian routes and as close as possible to

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			bus stops. Where provision for active travel and public transport will be ineffective, planning permission will be refused. Access to public transport can also provide an alternative to private car use, lessening the number of additional vehicle movements that would otherwise arise from new developments. This is most effective where the stops are in close proximity (within 200m) of dwellings and destinations, and where the frequency of services is highest. Where development sites require new, additional or diverted bus services, there will be a need for the development to support the service whilst it is becoming established, through developer contributions. Bus services are only likely to meet needs for local journeys. Access to rail services to make longer journeys, rather than to use car for the whole journey, benefits from proximity from the development site to allow access by walking or cycling, but also from the provision of park-and-ride facilities.
Historic England	No comment.	No comment.	Noted.

Respondent name	(19) What views do you have on how the new Local Plan should provide for older people's housing?	(20) What views do you have on how the new Local Plan should provide for looked-after children and adults with care support? What controls should the new local plan seek to introduce?	Council Response
Lancashire County Council	LCC had housing lin undertake a piece of research on predicted housing need for LDA, MH and Older people including extra care in 2022 predicting the future demand up to 2032. I would encourage the Council to include policies that reflect this need. For Fylde the predicted new demand is •Learning Disability & Autism- 54 new units •Mental health needs- 21 new units •Older people with a physical disability 50 new units •Extra care (including private provision) 399 new units. As part of our Housing with care Strategy 2018-2025 we wanted to develop a new extra care scheme in each of the districts. I am not aware of any new extra care scheme being developed where LCC could place people who have a Care Act assessment and require statutory care funded by LCC; I would encourage the Council to include policies to provide for at least one new extra care development that is at affordable rent and available for people with assessed needs. Whilst all new dwellings must be built to the M4(1) Category 1: Viable Dwellings standard,	LCC had housing lin undertake a piece of research on predicted housing need for LDA, MH and Older people including extra care in 2022 predicting the future demand up to 2032. I would encourage the Council to include policies that reflect this need. For Fylde the predicted new demand is •Learning Disability & Autism- 54 new units •Mental health needs- 21 new units •Older people with a physical disability 50 new units •Extra care (including private provision) 399 new units. As part of our Housing with care Strategy 2018-2025 we wanted to develop a new extra care scheme in each of the districts. I am not aware of any new extra care scheme being developed where LCC could place people who have a Care Act assessment and require statutory	Please refer to Strategic Policy HOU6: Housing for Adults Requiring Care, Support or Management, Strategic Policy HOU4: Housing for Older People, and Strategic Policy HOU2 Density and Mix of Housing for further information.

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	the optional M4(2) Category 2: Accessible and Adaptable Dwellings standard goes further, in requiring homes to be built in such a way that they can be adapted to an occupier's changing needs. The M4(3) Category 3: Wheelchair User Dwellings standard is specific for wheelchair users. Making use of the Government's optional technical standards for accessible and adaptable housing can ensure accessibility and inclusivity and promote better living opportunities across all ages. The Planning Practice Guidance suggests that local authorities should consider likely future need for housing for older and disabled people (including wheelchair-user dwellings) as well as the overall impact on viability, when determining whether to introduce the optional accessibility standards. The need for homes which meet residents' accessibility requirements is particularly relevant in Fylde. It is acknowledged in Fylde's Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042 that "The existing population of the	care funded by LCC; I would encourage the Council to include policies to provide for at least one new extra care development that is at affordable rent and available for people with assessed needs. Whilst all new dwellings must be built to the M4(1) Category 1: Visitable Dwellings standard, the optional M4(2) Category 2: Accessible and Adaptable Dwellings standard goes further, in requiring homes to be built in such a way that they can be adapted to an occupier's changing needs. The M4(3) Category 3: Wheelchair User Dwellings standard is specific for wheelchair users. Making use of the Government's optional technical standards for accessible and adaptable housing can ensure accessibility and inclusivity and promote better living opportunities across all ages. The Planning Practice Guidance suggests that local authorities should	

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	Borough already has a disproportionate number aged 65 and over (24,817, representing 29% of the population, compared to 21.2% in Lancashire and 18.7% in England). The population is projected to age further, with those aged 65 and over increasing by 10,482 by 2042 and those 85 and over increasing by 2,696 (77.8%)". With regard to the proportion of housing occupied by older adults in Fylde, there are an estimated 11,607 (31%) households, either as a one-person household or single-family household, in which all occupants were aged 66 and over (2021 Census) . The 2018 household projections for England suggests that, by 2043, over 23,000 households in Fylde will have at least one occupant aged 65 and over. This is a projected increase of 8,700 households, compared to 2018 . Adaptable homes not only benefit older people but also those with disabilities and long-term health problems. 7.6% of people in Fylde identified as being disabled and limited a lot in their day-to-day activities (2021, Census) . It is estimated that by 2035, there will be 2,186 adults aged 18-64 with a moderate or severe	consider likely future need for housing for older and disabled people (including wheelchair-user dwellings) as well as the overall impact on viability, when determining whether to introduce the optional accessibility standards. The need for homes which meet residents' accessibility requirements is particularly relevant in Fylde. It is acknowledged in Fylde's Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042 that "The existing population of the Borough already has a disproportionate number aged 65 and over (24,817, representing 29% of the population, compared to 21.2% in Lancashire and 18.7% in England). The population is projected to age further, with those aged 65 and over increasing by 10,482 by 2042 and those 85 and over increasing by 2,696 (77.8%)". With regard to the proportion of housing occupied by older adults in	

Respondent name	(19) What views do you have on how the new Local Plan should provide for older people's housing?	(20) What views do you have on how the new Local Plan should provide for looked-after children and adults with care support? What controls should the new local plan seek to introduce?	Council Response
	personal care disability living in Fylde. There are clear indications that there is a need for dwellings which can be easily adapted to meet the changing circumstances of its occupants in Fylde. In the Housing Needs Survey conducted for Fylde (2022) , it was found that overall there are an estimated 9,260 (23.8%) households with one or more members in an identified support needs group that may require household adaptations. The Government's Planning Practice Guidance provides a link to the EC Harris Cost Impact study (2014) , for Councils to use when considering the implications of introducing the optional accessibility standards, locally. The report outlines the range of additional costs associated with the construction of different types of M4(2) standard dwelling, which range from £940 for a 1-bed apartment to £520 for a 4-bed semi-detached property. However, there may be increases in building costs since the publication of the report. The 2020 Government consultation on the standards of adaptability and accessibility in new	Fylde, there are an estimated 11,607 (31%) households, either as a one-person household or single-family household, in which all occupants were aged 66 and over (2021 Census) . The 2018 household projections for England suggests that, by 2043, over 23,000 households in Fylde will have at least one occupant aged 65 and over. This is a projected increase of 8,700 households, compared to 2018 . Adaptable homes not only benefit older people but also those with disabilities and long-term health problems. 7.6% of people in Fylde identified as being disabled and limited a lot in their day-to-day activities (2021, Census) . It is estimated that by 2035, there will be 2,186 adults aged 18-64 with a moderate or severe personal care disability living in Fylde. There are clear indications that there is a need for dwellings which can be	

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	homes was developed in response to the rising concerns that in the drive to achieve housing numbers, the delivery of housing that suits the needs of the households (in particular those with disabilities) was being compromised on viability grounds. As a result of this consultation, the Government committed to raising the accessibility standards of new homes by planning to "mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes". The Fylde Healthy Living Supplementary Planning Document (SPD) Adopted 11 September 2019 states "Applicants and developers are expected to adopt as a minimum the Building Regulations Accessible and Adaptable Standard (M4(2)Category 2) within their proposals". Aligned to this, to ensure that all future homes in Fylde can be adapted to meet individuals needs as their circumstances change, Public Health recommend the following is incorporated into a Fylde Local Plan to 2042 policy: 1. 100% of all new build homes should be built in accordance with the requirements laid in out in	easily adapted to meet the changing circumstances of its occupants in Fylde. In the Housing Needs Survey conducted for Fylde (2022) , it was found that overall there are an estimated 9,260 (23.8%) households with one or more members in an identified support needs group that may require household adaptations. The Government's Planning Practice Guidance provides a link to the EC Harris Cost Impact study (2014) , for Councils to use when considering the implications of introducing the optional accessibility standards, locally. The report outlines the range of additional costs associated with the construction of different types of M4(2) standard dwelling, which range from £940 for a 1-bed apartment to £520 for a 4-bed semi-detached property. However, there may be increases in building costs since the publication of the report.	

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	M4(2) Accessible and Adaptable Dwellings unless this is superseded by M4(3) building regulations or other specialist requirements. For further information, data, and evidence about Adaptable Homes please see the attached Public Health Advisory Note – Adaptable M4(2) Homes .	The 2020 Government consultation on the standards of adaptability and accessibility in new homes was developed in response to the rising concerns that in the drive to achieve housing numbers, the delivery of housing that suits the needs of the households (in particular those with disabilities) was being compromised on viability grounds. As a result of this consultation, the Government committed to raising the accessibility standards of new homes by planning to "mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes". The Fylde Healthy Living Supplementary Planning Document (SPD) Adopted 11 September 2019 states "Applicants and developers are expected to adopt as a minimum the Building Regulations Accessible and Adaptable Standard (M4(2)Category 2) within their proposals".	

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		Aligned to this, to ensure that all future homes in Fylde can be adapted to meet individuals needs as their circumstances change, Public Health recommend the following is incorporated into a Fylde Local Plan to 2042 policy: 1. 100% of all new build homes should be built in accordance with the requirements laid in out in M4(2) Accessible and Adaptable Dwellings unless this is superseded by M4(3) building regulations or other specialist requirements. For further information, data, and evidence about Adaptable Homes please see the attached Public Health Advisory Note – Adaptable M4(2) Homes .	
National Highways	Q19. WSP recommend 'no comment' to this question.	Q20. WSP recommend 'no comment' to this question.	Noted.
Planning Bureau for	It is noted that para 4.10 of the consultation identifies a large population of elderly people as		Strategic Policy HOU4: Housing for Older People proposes that the Council will support

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Churchill Living McCarthy Stone	well as noting that the existing plan has a policy that encourages provision of accommodation for elderly people with support / care needs but it does not provide for wider types of older people's housing. Having reviewed the existing policy (Strategic Policy H2 Density and Mix of New Residential development) it appears that this attempts to meet the needs of the elderly population through requiring at least 20% of mainstream homes to be built to the M4(3) (2a) standard and then supports specialist elderly accommodation subject to a number of criteria. The policy details what the council considers is specialist housing for older people and this includes complying with the M4 (3(2a)) standard, having a communal lounge, a shared laundry, an over 55 age restriction, a daily hot meal service and an emergency call system. This is quite restrictive and falls within the 'extra care or housing with care' definition of the PPG regarding specialist housing for older people Paragraph: 010 Reference ID: 63-010-20190626 rather than housing with support. It is well documented that the UK has an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set		the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton, providing the development does not require or involve the loss of an existing community facility. Residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3 which may include: True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace. • Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of dwellings released, in accordance with Planning Practice Guidance; • Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats; and/or • Other

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	to increase from 3.2 million to 5 million (ONS mid 2018 population estimates). It is generally recognised (for example, within the Homes for Later Living Report September 2019), that there is a need to deliver 30,000 retirement and extra care houses a year in the UK to keep pace with demand. Government policy, as set out in the revised NPPF, is to boost significantly the supply of housing. Paragraph 60 reads: "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." The revised NPPF looks at delivering a sufficient supply of homes and within this context Paragraph 63 stresses that the size, and type and tenure of housing needed for different groups in the community, including older people, should be assessed and reflected in planning policies. This incorporates retirement housing, housing with-care, and care homes. The PPG 'Housing for Older and Disabled People' (2019) reinforces the need to provide housing for		types of specialist accommodation built to M4(3). Lancashire County Council (LCC) Estimated Need for Supported Housing and Accommodation in Lancashire projects a net need for 399 additional housing with care (extra-care) units in Fylde. Of this total, 259 units are expected to be required for sale/shared ownership accommodation, while 140 units are projected to be needed for social or affordable rented accommodation. LCC notes that care home accommodation is not accommodation that most older people choose, rather that it arises from crisis situations. Therefore increasing provision of extra-care accommodation can prevent situations of crisis arising and provide a type of accommodation that people will choose. Proposed Council policies will be subject to a viability assessment.

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	older people. Paragraph 001 Reference ID: 63-001-20190626 states: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decisiontaking" (emphasis added). Paragraph 003 Reference ID: 63-003-20190626 recognises that: "The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support." Thus, a range of provision needs to be planned for not just extra care housing. Paragraph 006 Reference ID: 63-006-20190626 sets out:		

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	“Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.” Proposed policies need to reflect the urgency and ‘critical’ need for Older Persons’ Housing as well as recognising the many additional benefits delivered when such housing is developed in an area. In the recently published Older Persons Housing Task Force (dated 26th November 2024) it is highlighted that there is a misunderstanding of the benefits of older persons housing, including the impacts to the NHS. Extra Care Charitable Trust have commissioned a report which shows the benefits to older persons from improved physical and mental health in retirement communities, resulting in cost savings to the NHS. The independent study undertaken by Aston and Lancaster Universities¹ demonstrates the following findings: • Annual NHS savings of 38% per person • 46% reduction in routine and regular GP visits • Significant improvement in the level of exercise		

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	done by residents (75%) • Reduction in loneliness with 86.5% of residents acknowledging they were 'never or hardly ever' lonely. • 14.8% reduction in depressive symptoms amongst residents after three years In addition to this, specifically designed housing for older people offers significant opportunities to enable residents to live independent for longer. The Older Persons Housing Taskforce identifies that most senior citizens (over 90%) live in mainstream housing which is often unsuitable for later living, with only 9% having suitable features for individuals with mobility difficulties. It is also identified that 1 in 5 senior citizens live in poverty and in non-suitable housing, which comes at a significant cost to the NHS, estimated to be £1.4 billion per year. Similar findings are also reflected in "Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living which explores the savings that the government and individuals could expect to make if more older people in the UK could access specialist forms of accommodation. The analysis shows that: • Each person living in a home for later living		

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	enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. • Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. • On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.' A further benefit of the provision of housing for older people is the choice it offers the market and the ability for residents to right size. In many cases, older residents under occupy family homes once their grown up children have left to form their own households. A recent report 'Too Little, Too Late?' (June 2020) sets out that downsizing is key to tackling the national housing crisis. It acknowledges that under occupation is greatest among the elderly population but current housing stock in the UK limits their options. If more family homes are freed up by downsizing, the benefits would be		

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	felt across the housing market, with families being able to 'upsize' and smaller homes becoming available for first time buyers. This is further supported by a report 'Chain Reaction' (August 2020) which finds: • Circa 3 million older people in the UK aged 65+ want to downsize. • If those that wanted to were able to do so, this would free up nearly 2 million spare bedrooms, predominantly in three bedroom homes with gardens, ideally suited for young families with children. • The chain impact would be a major boost for first time buyers with roughly 2 in every 3 retirement properties built releasing homes suitable for first time buyers. It is therefore clear that there is a large need for specialist housing for older people and that such housing brings many benefits. Accessible and Adaptable housing The current policy also requires provision for 20% of market homes to meet the M4(3) wheelchair user dwellings standard and 100% of purpose built specialist elderly accommodation to meet this standard. It is common for Local Authorities to conflate the needs of 'wheelchair users' with the needs of		

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	older people in the community. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing. Older people's housing and particularly extra care housing should therefore be incorporated into the emerging Local Plan separately to adaptable and accessible housing and not confused with it. Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support', the council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.		

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	Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons scheme reducing independence contrary to the ethos of older persons and particularly extra care housing and this should be recognised within the plan. We would also like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is		

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	primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). M4 2 and 3 Housing also has a cost implication and may serve to reduce the number of dwellings and further reduce viability. The council need to therefore ensure that the requirement or M4(2) and M4(3) housing is incorporated correctly into any forthcoming viability study and if this shows that housing is not viable due to the requirement the ask for M4(3) housing, this should be removed. Given national policy and the council's acknowledgement of an ageing population a much more supportive policy that supports all forms of specialist housing for older people should be incorporated into the Local Plan. This should make reference to definitions within the PPG. The best approach towards meeting the diverse housing needs of older people is for the plan to: • Identify the older person's housing need. • Allocate specific sites to meet the needs of		

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	older people that are in the most sustainable locations close to key services. • Include a standalone policy actively supporting the delivery of specialist older people's housing with good access to services and facilities for older people. • Ensure the policy does not contain too many requirements that will affect viability and corresponding deliverability. While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council: "The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close		

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	care, Extra Care and assisted care housing and Continuing Care Retirement Communities."		
PWA Planning for Medicom	The principle for meeting the needs of all these specific groups is the same: where a need exists in the Council's evidence base, or is demonstrated through a planning application, and the proposed site is in a sustainable location, the proposal should be supported. 5.5. The current Local Plan's restrictive policies for development in the Green Belt and open countryside create an unnecessary barrier. A sound new plan must replace this with a criteria-based policy that allows proposals to be judged on their merits, including their sustainability in terms of access to services like schools, healthcare, and public transport. 5.6. The site at School Farm is sustainably located adjacent to Warton and its services, making it a suitable location to accommodate a mix of housing types, including family homes and housing for specific groups, as part of a comprehensive development.		The Council is obliged to meet housing needs – including the need from a mix of sizes and types - and this will be applied across the borough but with a focus on four strategic locations. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Outside of the existing towns and main villages, the countryside is defined on the Policies Map as areas not covered by Green Belt or Areas of Separation. Designation is necessary to prevent uncontrolled development: without restriction, the countryside would be developed for very low-density housing at random locations, resulting

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			in profligate use of land, the creation of homes in isolated locations.
PWA Planning for Pringle Homes	5.5. It is vital that the Plan facilitates a wide mix of high-quality accommodation for older people. Pringle Homes' proposed development at Greenlands Farm has been designed to meet this need, incorporating "accessible dwellings for older residents" to help maintain the social fabric of the village. We support a policy approach that includes: 1. A Requirement for Adaptable Homes: For all major housing developments, the Plan should include a policy requiring a proportion of new homes to meet the accessibility and adaptability standards of Part M4(2) of the Building Regulations. This standard provides a significant improvement in accessibility for many people with mobility issues without the more onerous and potentially unviable requirements of the full wheelchair user standard (M4(3)). 2. Proactive Allocation of Specialist Sites: A percentage-based policy alone will not address the full spectrum of needs,	5.6. The principle for both these groups is the same: where a need exists in the Council's evidence base, or is demonstrated through a planning application, and the proposed site is in a sustainable location, the proposal should be supported. The current Local Plan's restrictive policies for development outside of settlement boundaries (e.g., Policy GD4) create an unnecessary barrier. A sound new plan must replace this with a criteria-based policy that allows proposals to be judged on their merits, including their sustainability in terms of access to services like schools, healthcare, and public transport. Arbitrarily ruling out sites because they fall within the 'open countryside' is a flawed approach that will fail	The Local Plan will allocate sufficient sites in appropriate locations that will be capable of meeting a wide range of needs.

Respondent name	(19) What views do you have on how the new Local Plan should provide for older people's housing?	(20) What views do you have on how the new Local Plan should provide for looked-after children and adults with care support? What controls should the new local plan seek to introduce?	Council Response
	particularly for those requiring housing-with care or extra-care schemes. The Plan must therefore go further and allocate specific sites suitable for the development of specialist retirement and care communities. These proposals should be supported where they are sustainably located and a need is demonstrated.	to meet the identified needs for these specific groups.	
PWA Planning	5.4. Our overarching position is that the Local Plan should adopt flexible, criteria-based policies that enable the delivery of all types of specialist housing where a need is demonstrated in a sustainable location. The current Plan's restrictive approach, particularly in the open countryside, actively hinders the delivery of much-needed accommodation for vulnerable groups. 5.5. It is vital that the Plan facilitates a wide mix of accommodation for older people, from adaptable general needs housing to specialist housing-with-care. We support a two-pronged approach: 1. A Requirement for Adaptable Homes: For all major housing developments, the Plan should include a policy requiring a proportion of new homes to meet the accessibility and adaptability standards of Part M4(2) of the Building Regulations.	5.6. The principle for both these groups is the same: where a need exists in the Council's evidence base, or is demonstrated through a planning application, and the proposed site is in a sustainable location, the proposal should be supported. The current Local Plan's restrictive policies for development outside of settlement boundaries (e.g., Policy GD4) create an unnecessary barrier. A sound new plan must replace this with a criteria-based policy that allows proposals to be judged on their merits, including their sustainability in terms of access to services like schools, healthcare, and public transport. Arbitrarily ruling out sites because they fall within the	The Local Plan will allocate sufficient sites in appropriate locations that will be capable of meeting a wide range of needs.

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	This standard provides a significant improvement in accessibility for many people with mobility issues without the more onerous and potentially unviable requirements of the full wheelchair user standard (M4(3)). 2. Proactive Allocation of Specialist Sites: A percentage-based policy alone will not address the full spectrum of needs, particularly for those requiring housing-with care or extra-care schemes. The Plan must therefore go further and allocate specific sites suitable for the development of specialist retirement and care communities. These proposals should be supported where they are sustainably located and a need is demonstrated.	'open countryside' is a flawed approach that will fail to meet the identified needs for these specific groups.	
Steven Abbott Associates for Bradkirk Business Park	Specific policy is needed to promote the provision of specialist housing for older people for all tenure types. This should be realistic about what 'old' means in the 21st century. Residential care homes should be given specific support and that form of accommodation not treated within overall housing provision but added to it. Only sustainable locations should be proposed.		The Council's overall approach is to support the delivery of an appropriate mix of housing types and sizes, including housing for older people in appropriate locations. Specifically, Strategic Policy HOU4: Housing for Older People proposes to state that the Council will support the development of new care homes and extra-care flats within accessible locations within the existing settlement areas of St Annes, Ansdell and Fairhaven, Lytham, Kirkham, Wesham, Warton and Freckleton,

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			providing the development does not require or involve the loss of an existing community facility. In addition, residential development sites over 20 units (and smaller sites that are portions of larger allocations over 20 dwellings) will be required to provide 20% of housing units designed specifically to accommodate older people, marketed with a restriction to people over 55 years of age, in accordance with Policy HOU3 which may include: True bungalows of no more than 3 bedrooms and less than 100 m2 gross internal floorspace;. • Care homes for older people, with the number of equivalent housing units calculated on the basis of the number of dwellings released, in accordance with Planning Practice Guidance; • Extra-care flats i.e. supported sheltered flats where an element of care is available, based on the number of individual flats; and/or • Other types of specialist accommodation built to M4(3).

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Anna Briggs		Yes, Gypsy people should be offered spaces to set up camp.	Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites proposes to state that proposals to provide additional gypsy and traveller pitches within the defined boundaries of the existing sites to meet identified needs will be supported providing that satisfactory living conditions for all residents on the site are not compromised. Proposals for new gypsy and traveller and travelling showpeople's sites will only be permitted where need is demonstrated, and where it is demonstrated that it cannot be met through an existing site. Locational requirements will be assessed against national policy. Proposals to include gypsy and traveller or travelling showpeople's sites within allocated development sites will be supported where it can be shown that they will contribute towards meeting needs.
Bryning with Warton Parish Council	Expansion of existing sites would be a practical solution	yes	Comments noted. Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites proposes to state that proposals to provide additional gypsy and traveller pitches within the defined boundaries of the existing sites to meet

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			identified needs will be supported providing that satisfactory living conditions for all residents on the site are not compromised. Proposals for new gypsy and traveller and travelling showpeople's sites will only be permitted where need is demonstrated, and where it is demonstrated that it cannot be met through an existing site. Locational requirements will be assessed against national policy. Proposals to include gypsy and traveller or travelling showpeople's sites within allocated development sites will be supported where it can be shown that they will contribute towards meeting needs.
Christine Abbott		Definitely not.	The Local Plan is required to consider all needs for housing, including Gypsies, Travellers and Travelling Showpeople. The Fylde Coast Gypsy, Traveller and Travelling Showpersons' Accommodation Assessment 2023/24 (GTAA) identifies a need for 15 additional Gypsy and Traveller pitches. It identifies the potential for between 17 and 21 pitches to become available through the intensification/ expansion of existing sites.

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			Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites proposes to state that proposals to provide additional gypsy and traveller pitches within the defined boundaries of the existing sites to meet identified needs will be supported providing that satisfactory living conditions for all residents on the site are not compromised. Proposals for new gypsy and traveller and travelling showpeople's sites will only be permitted where need is demonstrated, and where it is demonstrated that it cannot be met through an existing site. Locational requirements will be assessed against national policy. Proposals to include gypsy and traveller or travelling showpeople's sites within allocated development sites will be supported where it can be shown that they will contribute towards meeting needs.
David Chedd		No	Comment noted.
Emma Swindells	None should be provided	No	Comments noted
Frank Andrews	no	no	Comment noted
Gerard Malone	Have no objections	Yes	Comments noted.

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Hannah Dell'Armi	I don't know enough about how many there are currently		There are 8 authorised existing gypsy and traveller sites in Fylde which are identified on the Policies Map. There is one existing Travelling Showpeople's site which is identified on the Policies Map. The Fylde Coast Gypsy, Traveller and Travelling Showpersons' Accommodation Assessment 2023/24 (GTAA) identifies a need for 15 additional Gypsy and Traveller pitches. It identifies the potential for between 17 and 21 pitches to become available through the intensification/ expansion of existing sites.
Irene Jacques	Additional pitches should not be provided.	No.	The Local Plan is required to consider all needs for housing, including Gypsies, Travellers and Travelling Showpeople. The Fylde Coast Gypsy, Traveller and Travelling Showpersons' Accommodation Assessment 2023/24 (GTAA) identifies a need for 15 additional Gypsy and Traveller pitches. It identifies the potential for between 17 and 21 pitches to become available through the intensification/ expansion of existing sites. Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites proposes to state that proposals to provide additional gypsy and

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			traveller pitches within the defined boundaries of the existing sites to meet identified needs will be supported providing that satisfactory living conditions for all residents on the site are not compromised. Proposals for new gypsy and traveller and travelling showpeople's sites will only be permitted where need is demonstrated, and where it is demonstrated that it cannot be met through an existing site. Locational requirements will be assessed against national policy. Proposals to include gypsy and traveller or travelling showpeople's sites within allocated development sites will be supported where it can be shown that they will contribute towards meeting needs.
John Leadbeater	None	No	Comments noted
John Maskell	gypsy & traveller pitches should be allocated to brownfields sites	No	Comments noted. Proposals for new gypsy and traveller and travelling showpeople's sites will only be permitted where need is demonstrated, and where it is demonstrated that it cannot be met through an existing site. Locational requirements will be assessed against national policy.

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Keith McKay		No. All too often, such sites produce uncontrolled wasteland/industrial tips which are difficult to retrieve and result in further abuse. They seem to insist on a walled environment enclosing their spaces, which is at odds with rural development and character.	Comments noted.
Linda Nulty	They should be controlled. Recently properties and land are being bought and used for this purpose with no control it seems. Ordinary houses with extra static caravans around them (more than one for redevelopment projects) should not be allowed	Yes for affordable housing. Travellers as above	Comments noted. The Local Plan is required to consider all needs for housing, including Gypsies, Travellers and Travelling Showpeople. The Fylde Coast Gypsy, Traveller and Travelling Showpersons' Accommodation Assessment 2023/24 (GTAA) identifies a need for 15 additional Gypsy and Traveller pitches. It identifies the potential for between 17 and 21 pitches to become available through the intensification/ expansion of existing sites. Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites proposes to state that proposals to provide additional gypsy and traveller pitches within the defined boundaries of the existing sites to meet identified needs will be supported providing that satisfactory living conditions for all residents on the site are not compromised. Proposals for new gypsy and traveller and travelling showpeople's sites will only be

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			permitted where need is demonstrated, and where it is demonstrated that it cannot be met through an existing site. Locational requirements will be assessed against national policy. Proposals to include gypsy and traveller or travelling showpeople's sites within allocated development sites will be supported where it can be shown that they will contribute towards meeting needs.
Linda Nulty		I expected there would be more questions in this vital section of this consultation. The biggest problem in Fylde Borough's housing supply is that the properties being built by developers does not meet the needs of the resident population. The overwhelming need and wants of the residents is for smaller properties 1,2 and 3 beds, affordable in all senses of the word. First time buyers, older residents downsizing and Socially rented properties. There is very little need or demand for the larger properties favoured by the developers - hence the slowing of the build out rates. Properties are only attracting an influx via the Motorway of those who wish to sleep in our area but work and live most of their lives	Strategic Policy HOU2: Density and Mix of Housing proposes to state that A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they meet the Nationally Described Space

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		elsewhere. We must become more sustainable and community based.	Standard. Where very large rooms are included that are capable of straightforward subdivision. Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The Local Plan will plan positively and proactively to encourage sustainable economic growth to enhance employment opportunities for those living within and outside the borough.
Lytham St Annes Civic Society	If possible increase the size of current sites and if any new sites are developed ensure they are near transport hubs.		Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites proposes to state that proposals to provide additional gypsy and traveller pitches within the defined boundaries of the existing sites to meet identified needs will be supported providing that satisfactory living conditions for all residents on the site are not compromised. Proposals for new gypsy and traveller and travelling showpeople's sites will only be

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			permitted where need is demonstrated, and where it is demonstrated that it cannot be met through an existing site. Locational requirements will be assessed against national policy. Proposals to include gypsy and traveller or travelling showpeople's sites within allocated development sites will be supported where it can be shown that they will contribute towards meeting needs.
Marcus Dowling	None	Yes	Comments noted.
P Stanford	Not sure if Fylde has a need – if we have .. then something is possibly needed ?	No	Comments noted. There are 8 authorised existing gypsy and traveller sites in Fylde which are identified on the Policies Map. There is one existing Travelling Showpeople's site which is identified on the Policies Map. The Fylde Coast Gypsy, Traveller and Travelling Showpersons' Accommodation Assessment 2023/24 (GTAA) identifies a need for 15 additional Gypsy and Traveller pitches. It identifies the potential for between 17 and 21 pitches to become available through the intensification/ expansion of existing sites.
Philip Bickerstaff	As rate payers are paying for local services, these new sites come at a	No	Comments noted.

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	cost for all residents, and probably a reduction in house values in the area		
Stephen and Jacqueline Croft	No idea what the need is or current concerns are.	What would this group like and why - that is where I would begin.	There are 8 authorised existing gypsy and traveller sites in Fylde which are identified on the Policies Map. There is one existing Travelling Showpeople's site which is identified on the Policies Map. The Fylde Coast Gypsy, Traveller and Travelling Showpersons' Accommodation Assessment 2023/24 (GTAA) identifies a need for 15 additional Gypsy and Traveller pitches. It identifies the potential for between 17 and 21 pitches to become available through the intensification/ expansion of existing sites. Proposals for new gypsy and traveller and travelling showpeople's sites will only be permitted where need is demonstrated, and where it is demonstrated that it cannot be met through an existing site. Locational requirements will be assessed against national policy. Strategic Policy HOU3: Affordable Housing proposes to state that for residential developments within rural areas, the provision of affordable housing will be primarily to meet the requirements identified for the closest Tier 1 Larger Rural Settlements: i.e. Newton, Staining

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			and Wrea Green or Tier 2 Smaller Rural Settlements: i.e. Clifton, Elswick, Singleton and Weeton. If, having regard to an agreed assessment, the level of identified local need is less than the equivalent of 30% of the homes proposed, the balance of the provision will be delivered for borough wide needs.
Susan Lee	Local consultation	No	Comments noted.
Asteer Planning for Applethwaite		Comments on the Emerging Local Plan Evidence Base Housing Needs Survey (September 2022) 3.20 The Fylde Housing Needs Survey (2022) undertook an assessment of the affordable housing need across the borough. This found that within the 'rural east', which would cover Newton-with-Scales, that there is a total gross need for 58 social / affordable rented houses and a total gross need for 28 homes for affordable home ownership. 3.21 This reinforces the importance of allocating sites within the rural east area which have the capacity and deliverability to provide affordable housing provision to meet local needs, such as the site at Blackpool Road.	Comments noted. Strategic Policy DST5: The Countryside proposes to state that development in the Countryside, will be permitted rural exception sites to meet identified local affordable housing need (within the rural parish concerned and neighbouring rural parishes only) on land not already allocated for housing which meets the criteria set out in the Framework. Strategic Policy HOU3: Affordable Housing proposes to state that for residential developments within rural areas, the provision of affordable housing will be primarily to meet the requirements identified for the closest Tier 1 Larger Rural Settlements: i.e. Newton, Staining and Wrea Green or Tier 2 Smaller Rural Settlements: i.e. Clifton, Elswick, Singleton and Weeton. If, having regard to an agreed assessment, the level of identified local need is

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			less than the equivalent of 30% of the homes proposed, the balance of the provision will be delivered for borough wide needs.
Historic England	Any proposal should be supported by an assessment of the allocation for their impact on the historic environment through screening and a heritage impact assessment.	Any proposal should be supported by an assessment of the allocation for their impact on the historic environment through screening and a heritage impact assessment.	The Local Plan will protect heritage assets and the local character of the borough. The Council will do this by: • Continuing to implement the Built Heritage Strategy for Fylde. • Promote heritage-led regeneration including: enhancing the commercial and resort core of St Annes to enhance the vibrant seaside resort; protecting and enhancing the heritage of Lytham; and revitalising the commercial core of Kirkham. • Produce Conservation Area Appraisals and Management Plans Identify opportunities to promote the district's heritage assets through tourism, culture and economic development • Seek to identify further local heritage assets • Seek opportunities for safeguarding the future of any heritage assets at risk • Work with partners to improve and manage the public realm in historic areas. Please refer to

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			Strategic Policy ENT1: Historic Environment for further information.
National Highways	Q21. WSP recommend 'no comment' to this question.	Q22. WSP recommend 'no comment' to this question.	Noted.
PWA Planning for Medicom		5.7. Yes, we support the principle of exception sites, but a truly flexible and positively prepared Local Plan should not need to rely on them. 5.8. Rural exception site policies are a mechanism to work around an otherwise restrictive planning system. A truly flexible plan should be able to support proposals for affordable or specialist housing on their own merits without needing an 'exception' policy. 5.9. The primary solution to meeting housing needs in sustainable locations is not to rely on adhoc exception sites, but for the Plan to undertake a comprehensive Green Belt review. This would allow for the planned release of the most sustainable and suitable sites, such as School Farm, which are logical extensions to settlements and can deliver a mix of housing tenures as part of the core development strategy. This is a more robust and plan-led approach than relying on exception policies.	Please refer to Strategic Policy HOU3: Affordable Housing, Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites for further information. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde.

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PWA Planning for Pringle Homes		5.7. Rural exception site policies are a tool to work around an otherwise restrictive planning system. While useful, they are symptomatic of a plan that is not flexible enough to respond positively to identified local needs. 5.8. Our preferred approach is for the Plan to be sufficiently flexible to support proposals for affordable and specialist housing on their own merits, without needing an 'exception' policy. A highly sustainable and deliverable site like Greenlands Farm, which is a logical extension to a Tier 1 village, should be allocated through the main policies of the Local Plan. It should not be forced to rely on a workaround policy. 5.9. If the plan's strategy is so restrictive that the only way to deliver rural affordable housing is through exception sites, then the strategy itself is flawed. A positively prepared plan should allocate sustainable sites like Greenlands Farm to deliver a mix of housing tenures, including affordable homes, as part of its core strategy for enhancing the vitality of rural communities.	Comments noted. Please refer to Strategic Policy HOU3: Affordable Housing, Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites for further information. Strategic Policy HOU2: Density and Mix of Housing proposes that developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. In assessing the number of bedrooms proposed, all habitable rooms excluding a single main reception/living room and a kitchen will be counted as bedrooms where they meet the Nationally Described Space Standard. Where very large rooms are included that are capable of straightforward subdivision. Strategic Policy HOU2 also proposes to deliver a broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes.

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PWA Planning		5.7. Yes, we support the principle of exception sites, but a truly flexible Local Plan should not need to rely on them. 5.8. Rural exception site policies are a mechanism to work around an otherwise restrictive planning system. While they can be a useful tool, they are symptomatic of a plan that is not flexible enough to respond to identified local needs. 5.9. Our preferred approach, as outlined in our response to the Development Strategy options, is for the Plan to be flexible enough to support proposals for affordable housing or Gypsy and Traveller pitches on their own merits, provided they are in sustainable locations and meet an evidence-based need. If a need is identified by the Council's own evidence (such as the HNS or GTAA) or is robustly demonstrated alongside a planning application, the Plan should be positive towards it, without requiring the site to be treated as an 'exception'. This provides a more responsive, certain, and NPPF-compliant framework for meeting the needs of all communities.	Comments noted. Please refer to Strategic Policy HOU3: Affordable Housing, Strategic Policy HOU8: Gypsy and Traveller and Travelling Showpeople's sites for further information. Strategic Policy DST5: The Countryside proposes to state that development in the countryside will be permitted in rural exception sites to meet identified local affordable housing need (within the rural parish concerned and neighbouring rural parishes only) on land not already allocated for housing which meets the criteria set out in the Framework. Outside of the main towns and large villages, the Borough is a sparsely populated agricultural area. Within this area, seven of the villages are identified in the existing Local Plan as being sufficiently sustainable to support a level of growth necessary to maintain the existing facilities. These are: Staining, Newton, Wrea Green, Clifton, Weeton, Elswick and Singleton. Beyond these, there exists a number of small hamlets and small collections of houses, and dispersed farms as typical for Lancashire. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net

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			additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. There are 8 authorised existing gypsy and traveller sites in Fylde which are identified on the Policies Map. There is one existing Travelling Showpeople's site which is identified on the Policies Map. The Fylde Coast Gypsy, Traveller and Travelling Showpersons' Accommodation Assessment 2023/24 (GTAA) identifies a need for 15 additional Gypsy and Traveller pitches. It identifies the potential for between 17 and 21 pitches to become available through the intensification/ expansion of existing sites.

Respondent name	(23) Do you agree that there should be specific policies in the Local Plan that identify and support the appropriate type of development on the three sites? What do you think the policies should cover?	(24) Are there other major sites in the Borough for which similar policies are needed? If so please explain.	Council Response
Alban Cassidy	Our comments in relation to Economic Development are generally being made by Claire Parker but as a wider matter, and in line with the bid for an AI Growth Zone in the Blackpool/Fylde/Wyre area, specific reference should be made to the potential for the provision of data centres on suitable employment sites given the wider role they can have in economic development and the importance that the Government has placed upon accommodating this market at a local and national level.	n/a	Comments noted. Policy ECD3 specifically outlines support for the Silicon Sands data and technology campus on the basis that proposals are in compliance with other policies in the Local Plan.
Anna Briggs	I'm not sure where to insert these issues as the categories you have used are wide so I'll copy them here and there: -aesthetics: harmonizing store fronts would help keep a certain level of charm. For example in St Annes, some shops just look dire and others beautiful. Maybe unified coloured awnings, plants hanging etc could make a more harmonious effect like in Lytham. More regular scrubbing of the rain protection kiosks and benches would be good as they often get covered in guano. The blue metal structures in St Annes could do well all being painted dark green or brick colour or brown to harmonize with the Victorian brick colour. -young people bullying, anti-social behaviour, poor mental health: young people often seem hopeless,	n/a	Many of the comments made address issues outside of the remit of the Local Plan and the planning system as set out below. The Local Plan will include design policies and guidance for issues including aesthetics. The wellbeing of young people is outside of the scope of the Local Plan. Ventures including markets is outside of the scope of the Local Plan. Beach pollution is covered under the Protected Environments and Assets Policies section. The acceptable levels of sea water bacteria are regulated under the European Bathing Water Directive. The issue is outside of the scope of the Local Plan.

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	with issues such as misogynistic behaviour, bullying, depression, vaping addiction, teen pregnancy, body image issues, not wearing bike helmets, and little to do. It is an older population but there truly are too few non-school fun spaces for young people to enjoy in all of Fylde. More CCTV for example in Ashton Gardens and on the beach would help curb anti-social behaviour perhaps. -I would appreciate the monthly market to be weekly, to be able to buy most of my fresh food from local producers and not supermarkets. -pollution on the beaches is INSANE and should not be left to volunteers to take care of. Many jobs could be created to fine and surveil and clean the beaches, as well as educating tourists about pollution. -water quality: I have lived here for a few years and the water has never been sufficient free from sewage to swim in. This is a major drawback to the local community's wellbeing and to tourism. -recycling should be enforced like in Germany. In all the workplaces I've had, no staff member recycled anything and management didn't care. -many roles locally are in elder care, this is my sector. This is a sector with a huge amount of managerial		Recycling is provided for within the design and amenity policies section of the plan. The care sector is outside of the scope of the Local Plan. Promotion of community facilities is outside of the scope of the Local Plan. Accessibility is provided for in the transport section of the Local Plan Hate speech etc. is outside of the scope of the Local Plan. The Local Plan provides for affordable housing units however the general issue of housing affordability is outside of the scope of the Local Plan. Provision of cultural events and art is outside of the scope of the Local Plan.

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	bullying and exploitation, pressure to not be unionized, ridiculously low pay and pressure to do non-contractual work. The CQC, NHS, unions, council and elder care organizations should be very concerned that our most vulnerable are cared for by understaffed, undertrained, exhausted, undersupported and underpaid people. -lack of knowledge about services: many people here are unaware about what cultural organizations, clubs, churches, libraries, the CAB, volunteering sector, the council etc. has to offer. The social media and newsletters from official channels should highlight these opportunities better. Blackpool council does a very good job at this. -accessibility: too many spaces are inaccessible. As an area with an older and very highly disabled population (the same for our tourists who are often older and disabled), Fylde could be a global model for smart accessible options for all to enjoy the beach, trains, buses, cafes etc. Why should disabled people wait until 9.30am to use their free pass on the bus? Do we not have medical appointments, work, school drop off, shopping to do like anyone else? -hate speech: the local social media is flooded with misinformation, conspiracy and hate speech. It would help for council communication staff to be a part of all		

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	local groups and share factual information to avoid this. Again, the Blackpool MP team does a very good job at social media, communication etc. and could be a model here. -renting: there should be an easier way to rent an apartment and avoid having to pay a deposit when on a low salary or benefits. If not for my relative, I would never have qualified to rent and ended up homeless. Most people can't afford a deposit. -events and art: having an artist in residence programme, who would contribute temporary installations in the squares, cutting-edge events, Q&As with school kids, open air screenings, curated pop-ups etc. would attract a lot of different tourists here and be fun for younger people.		
Bryning with Warton Parish Council	Yes, Policies/guidance on What/how to support to Village regeneration and/or infrastructure. Policies that Large corporations support or generate local SMEs	Land Registry Warton. All major corporations.	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites. These sites designated on the basis they are of strategic importance. The Land Registry, Wrea Brook Court, Warton is identified under policy ECD5: Protection of Existing Employment areas and is defined on the Local Plan to 2042 Policies Map.

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Claire Parker for Blackpool Council	Please see our Supporting Letter, submitted separately, for our representations on Economic Development. It is Blackpool Council's position that there should be a specific policy within the new Local Plan which identifies and supports appropriate types of development within the BAEZ and emphasises the important role the BAEZ will play in the local economy for the entire local plan period. This would also reflect how development within the BAEZ has been supported under the previous version of the Local Plan, which contained a site-specific policy, ref: EC4. Any such policy should reference the future intention of the Enterprise Zone to accommodate a new 'Silicon Sands' campus on land within Fylde, to the south of Squires Gate Lane. This development will provide a new data and technology campus that will utilise the presence of the Transatlantic Telecommunications fibre optic cable (CeltixConnect-2), which has brought ultra-high speed internet connection to the area, to support high performance data centres alongside businesses which could benefit from direct access to such facilities. The locational benefits of Silicon Sands are as follows: • Accessible by train, tram, air, rail and five minutes from M55 • 3m labour pool within 60min drive	As above	Fylde Council acknowledges and welcomes the supporting comments made in respect of Blackpool Airport Enterprise Zone. Policy ECD3 specifically outlines support for the Silicon Sands data and technology campus at Blackpool Airport and Enterprise Zone at land south of Squires Gate Lane on the basis that proposals are in compliance with other policies in the Local Plan. The boundary of the Enterprise Zone is defined on the Local Plan to 2042 Policies Map. The sustainable development of the BAEZ is supported in the areas outside of the green belt, however only where there are overriding operational requirements that constitute very special circumstances is development in the green belt justified. Land south of the BAEZ falls within the Green Belt and is expected that any proposals provide justification for their locational requirements for siting within the Green Belt.

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	•17% saving on average labour costs compared to GB average •30,000 digital and tech professionals nearby •1,000 new computing, engineering and technology graduates per year from Lancashire's universities •Located 20 miles from the UK's new National Cyber Force HQ •Growing Esports tourism industry Silicon Sands has been put forward to become an AI Growth Zone. Growth Zones will be designated by the government to attract investment in AI, driving innovation and creating high skilled jobs. If designated, the area would be provided government support and incentives to attract developers in facilitating the vision for this area. Data centres are being given increasing economic importance by the government, as evidenced within the December 2024 version of the NPPF. Paragraph 87 has been updated to reference data centres specifically as a type of infrastructure needed to support the growth of knowledge and data-driven, creative or high technology industries, for which planning policies should recognise and address the specific locational requirements of. An outline planning application for a technology exemplar facility, to include a data centre alongside research and development facilities, is due to be submitted imminently to Fylde Council for determination.		

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	In addition, proposals for a solar farm south of the BAEZ and new battery storage facilities should be acknowledged within the policy. A solar farm proposal has been subject to a recent screening opinion request (ref: 24/0478) wherein Fylde planning department determined that an EIA would not be required. It is expected that a planning application in relation to this development will be brought forward in early 2026. The solar farm would provide electricity to the BAEZ site, comprising a benefit to occupiers and support renewable energy and net zero targets. Battery storage would support the storage of any excess renewable energy until it is required. A Masterplan has been prepared which sets out visually the proposals for the BAEZ. This is a live document which is regularly updated to reflect development as it is brought forward thus representing a tool for establishing the design framework for the BAEZ, including the appropriate mix, quantum and location of development. It is proposed that any new Local Plan policy pertaining to the BAEZ reference the Masterplan to provide certainty of the mix of uses sought and to support determination of future planning applications. A copy of the latest version of the Masterplan is included within this representation for your consideration. The boundary of the Enterprise Zone should continue to be identified on the associated Policies Map and we would request also the identification of specific		

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	designations / allocations for the development set out above. Blackpool Council would wholly support the inclusion of a Blackpool Airport Enterprise Zone specific policy within the Local Plan to 2042.		
David Chedd	Yes	No	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.
Emma Swindells	Yes	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.
Ethan Ellison	Yes, should reflect the exceptional types of development in these area compared to the predominatly rural areas of Fylde and to maintain seperation.	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites. The Local Plan contains three specific policies for each of the strategic employment sites that detail the types of development that will be approved in principle. The policies map defines the boundaries of these sites to demarcate where these development controls apply.
Frank Andrews	yes	not that I am aware of	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.

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Frank Andrews	Yes	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.
Gerard Malone	Yes	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.
Hannah Dell'Armi	yes. House builders obviously want to make as much money from the land purchase as possible which means bigger houses, so I think they should be constrained in terms of providing for younger people and the elderly	Wrea Green in particular suffers from repeated submission for larger bungalows and 4/5 bedroom estates. We don't need more 400-600k houses we need home for younger people and the elderly otherwise the elderly cannot downsize without leaving the village and younger people also have to leave as the housing stock is too expensive.	Comment noted. The comment does not relate to the three strategic employment sites.
Irene Jacques	Encourage business owners to install solar panels on roofs, in car parks, etc.	Council offices to be encouraged to install solar panels.	Comments noted. Solar gain is covered in policy DSA1: Achieving Good Design in Development.
John Leadbeater	Yes, within the existing boundaries. For the reasons already stated, Warton in particular should be downgraded from being a strategic location.	None at present	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.
John Maskell	Yes	Not aware	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.

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Keith McKay	The proposals within the current plan seem sensible and adequately flexible.	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.
Linda Nulty	n/a	The Mill Farm "Sports" (JOKE) village needs major control. Especially conditions put on when permissions were granted should be enforced.	Comments noted. Mill Farm is identified in Policy ECD5: Protection of Existing Employment Areas and is defined on the Local Plan policies map. Sites identified in policy ECD5 will be retained for industrial, storage/distribution, light industry, office or sui generis industrial /commercial non town centre uses unless the requirements of policy ECD10 have been satisfied. The policy ensures conformity of uses with existing uses on the site.
Marcus Dowling	Yes	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.
Philip Bickerstaff	Extra local housing including social housing should be provided to reduce the impact of people commuting longer distances to work	n/a	The Local Plan recognises that the strategic employment sites allow residents to live close to employment opportunities that can reduce commuting and support the creation of sustainable communities.

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Stephen and Jacqueline Croft	Yes. Transport links, child care, school drop off ... go hand in hand	Not aware	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites.
Susan Lee	Yes, transport	3 is enough in a small rural borough	The Fylde Local Plan to 2042 identifies the three strategic sites as these accommodate established uses in sustainable locations. The sites are occupied by major employers, being accessible, well-served by public transport and in proximity to community facilities which can form the basis of linked trips.
Blackpool Council	Blackpool Airport Enterprise Zone and Economic Growth - Blackpool Council supports Fylde's recognition of the strategic economic role of the Blackpool Airport Enterprise Zone. In terms of employment land, we note the acknowledgement that Fylde has previously provided 14ha of employment land in the current Local Plan to meet unmet need within Blackpool.	n/a	Fylde Council acknowledges and welcomes the supporting comments made with regards to Blackpool Airport Enterprise Zone.
Defence infrastructure Organisation	n/a	National Security is the first responsibility of the Government. Defence is one of the 13 national infrastructures sectors defined as Critical National Infrastructure whose facilities, systems, sites, information, people, network and processes, are necessary for the country to function and upon which daily life depends. The	The Local Plan to 2042 contains Policy IFR3: Protection of Strategic National Infrastructure that prevents development and associated mitigation measures that would prejudice the safety or restrict operations at specific strategic national infrastructure, including the MOD Inskip and MOD Weeton Barracks sites. It provides protections against unsuitable third

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		approach of the National Security Strategy 2025 is to enhance the resilience of Critical National Infrastructure. Weeton Barracks and MOD Inskip are key defence sites which should, through the planning process, have in principle support for future defence developments necessary to maintain their outputs and also be appropriately protected from any third-party developments that have the potential to adversely affect defence outputs. The Council will be aware of the requirements of paragraphs 102 and 200 of the National Planning Policy (NPPF) as quoted below: “102. Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: b) recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area. 200. Planning policies and decisions should ensure...Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development	party development and IFR3 further requires that site operators and regulators to be consulted on relevant development proposals. To ensure national defence priorities are met, DST5: The Countryside permits development in the countryside at the MOD Inskip site, as identified on the policies map, subject to other Local Plan policies. DST5 reduces protections against development in the countryside on the MOD Inskip site specifically to accommodate operational defence needs. With regards to housing and Service Family Accommodation (SFA) the Local plan includes Policy HOU7: Weeton Barracks Service Accommodation. This policy provides specific guidance on provision for accommodation at Weeton Barracks, supporting schemes that secure and enhance accommodation to meet the needs of service personnel and their families on the site. It further supports the enhancement and provision of new facilities to support military personnel and their families and safeguards service accommodation by requiring all proposals in the vicinity of the site to be assessed for potential impacts on military activity. The policy seeks to refuse any development that could restrict military

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		permitted after they were established.” In line with the NPPF it is important that planning authorities and development plans recognise that MOD establishments are of strategic importance to the UK. It is crucial that Weeton Barracks and MOD Inskip are considered within the new Local Plan for Fylde for two principal reasons, firstly, ongoing operational defence needs and secondly, to protect operational defence land from being affected adversely from third party development proposed in the area. To ensure that the site delivers on its defence output there will be times when further developments are required at the sites. It is paramount for national defence priorities that the local plan is able to support the principle of such developments. It is essential for operational reasons that current and future defence related activities can be undertaken at the site without any additional restrictions or controls. For example third party developments within the vicinity of the site have the potential to restrict operations of certain facilities, potentially requiring the implementation of additional safeguards that together could constrain the ability to manage any future change and restricting the potential of	activity or future military development at the Weeton Barracks site.

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		future development requirements – all to the cost of the public purse and to the detriment of national defence preparedness. In such circumstances Weeton Barracks or MOD Inskip could be affected adversely by the impact of development proposed in the area, contrary to paragraphs 102 and 200 of the NPPF. Paragraphs 5.4 and 5.5 of the Options, Issues, Vision and Scope Consultation explains there are three strategic industrial sites which are of national or regional importance for which there is a need for particular controls on the type of development to be permitted at each site. Paragraph 16d) of the NPPF sets out that Plans should ‘contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’. We contend that whilst the principles of paragraphs 5.4 and 5.5 are correct and their reasoning are to support key operational sites, the absence similar intention for other key operational sites within Fylde does not assist the decision maker when it comes to making decisions for any future planning applications for developments at Weeton Barracks or MOD Inskip. Nor does it assist	

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		with considering any third-party planning applications which have the potential to adversely affect the operations of these sites. It would be wholly suitable for the new Local Plan to include a specific planning policy for these defence establishments that provides and protects both on-going and future operational defence needs for the sites and serves to ensure that any neighbouring development does not adversely impact upon these operations or, in turn, would be affected by the established use. For example, supporting proposals associated with defence and military use where they would enhance or sustain operational capabilities. Any policy should also ensure that for proposed non-military or non-defence related development within or in the areas of a defence or military site will only be supported where it would not adversely affect military operations or capability. The most important part of defence is its people. To ensure the sites can deliver on their outputs they require Service Family Accommodation (SFA), which, is a recognised housing need group within paragraph 63 of the NPPF. As national	

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		defence needs change there can be requirements for additional SFA. The Options, Issues, Vision and Scope Consultation is silent on this existing housing type and fails to recognise that during the plan period there could be a need for further SFA, contrary to paragraph 63 of the NPPF. We would therefore recommend that the Plan identifies SFA as a housing type that is present within Fylde and that there may be requirements for additional SFA as defence needs change in accordance with paragraph 102 of the NPPF. As Critical National Infrastructure it is important that Weeton Barracks and MOD Inskip are considered within the Local Plan for Fylde for two principal reasons, firstly, ongoing operational defence needs and secondly, to protect operational defence land from being affected adversely from third party development proposed in the area. To ensure that the site delivers on its defence output there will be times when further developments are required at the site. The new local plan and subsequent planning policies are the mechanism to ensure safeguards are in place to appropriately protect Critical National Infrastructure, as	

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		supported by paragraph 102 of the NPPF. We would strongly urge the authority to consider the inclusion of a military establishment policy within the Plan. Other local authorities have adopted plans with similar policies, and we would invite the authority to consider the attached examples at West Berkshire, Central Lincolnshire, Cheshire West and Chester, Northumberland, West Suffolk and Wiltshire. At the recent Examination in Public for the West Berkshire Local Plan, the Inspector requested a main modification to the Plan to include a policy relating to the protection of operational defence establishments within the area and principle support for future developments that directly sustains the functioning of these establishments. It would be wholly consistent with the approach taken by other local authorities for the Local Plan for Fylde to include a similar policy and the boundaries of the site defined on the policies map. To assist the authority, we would recommend the following policy should be included: Development within and effecting the	

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		operational defence sites at Weeton Barracks and MOD Inskip a) Development required for operational defence purposes within and around Weeton Barracks and MOD Inskip will be supported where it sustains the functioning and viability of these defence establishments. b) Non-defence related development in the areas around Weeton Barracks and MOD Inskip will only be supported where it would not adversely affect defence related operation or capability. c) Development of housing for Ministry of Defence personnel connected to an operational MOD establishment will be supported provided it satisfies relevant policy requirements in the Local Plan. The MOD also considers that the following text would be suitable to support the above recommended Policy: Weeton Barracks and MOD Inskip provide important outputs that support national defence activities. The NPPF outlines that planning policies and decisions should recognise and support development required for operational defence and security purposes. Associated developments such as housing for military personnel and	

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		their families are also required to support the delivery of defence outputs. National policy seeks to ensure that operational sites are not affected adversely by the impact of other development proposed in the area and that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.	
Environment Agency	The Local Plan should include a specific policy which includes spatial consideration of all environmental matters, and requires proposals to consider overall risks and mitigation/management measures. We would support the inclusion of site-specific policies for these regulated sites.	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites. Policy SLD1, SLD2 and SLD3 set out key site-specific requirements for the three strategic locations for development.
DLP Planning for BAE Systems	Given the importance of Warton Aerodrome to the national defence sector and the regional economy, BAE Systems considers it essential that both the operational Aerodrome and Enterprise Zone are supported by policies in the emerging Local Plan that protect them from development that may restrict or conflict with operations at the site and that support further development and growth at the site in order to maximise the benefits of the site to the economy. In relation to the Enterprise Zone site, a specific policy in the emerging Local Plan should support the types of development that is permitted and encouraged by	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the BAE Systems Warton Strategic Employment Site. The Aerodrome and Enterprise Zone are addressed in policies ECD1: BAE Systems, Warton and IFR3: Protection of Strategic National Infrastructure. ECD1 advocates for development that supports the core activities of the aerodrome site, including advanced engineering and manufacturing.

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	the LDO. It is important to note that the current LDO will expire in 2035. Given that the Local Plan period will last until 2042, it is important that any policy specific to the Enterprise Zone is explicit that support for that type of development will last beyond the LDO lifespan and that a renewal of the LDO will be supported. In relation to a policy for the operational areas of the Aerodrome, it should cover the following: 1. Protection for the operations at the Aerodrome from development in the vicinity that may restrict or harm operations at the Aerodrome. As referred to above, it is important that the airspace around Warton Aerodrome is kept free from obstacles to aircraft operations and that development does not impact or impede CNS at the Aerodrome in order for the Aerodrome to remain regulatory compliant and to ensure the safe operation of aircraft. The existing Local Plan contains a policy (Policy T2) that places great importance on the retention and development of aviation capabilities at Warton Aerodrome. It requires development within the 6km and 13 km safeguarding zones around the Aerodrome to demonstrate that there would be no adverse impacts on aviation operations, navigation systems, and communications, stating that where there would be adverse impacts planning permission would be refused.		Where a proposal has the potential for adverse impacts on the aviation operations, defence navigation systems and communications of BAE Warton, planning permission will be refused. This applies to proposals both within the safeguarded area and those within the wider area surrounding Warton Aerodrome. The Local Plan makes it clear that any development that compromise the security of BAE Warton will not be permitted and that where other legislation is impacted upon, planning permission will be refused. It is a statutory requirement for BAE Systems to be consulted on any development within the safeguarded area at Warton Aerodrome. Matters relating to the protection of the aerodrome from sensitive development are addressed in policy IFR3: Protection of Strategic National Infrastructure. This prohibits development, and associated mitigation measures, that would prejudice operations at Warton Aerodrome and requires BAE Systems as the site operator to be consulted for any development proposals. The requirement for additional space at Warton Aerodrome has been incorporated

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	BAE Systems considers that a similar policy is necessary in the emerging Local Plan. However, that policy should go further than Policy T2. It should be clear that Fylde Council will consult with BAE Systems on any planning application within the safeguarding zones, and set out details of the information that must be submitted with planning applications in order for BAE Systems to be able to undertake the necessary physical and technical safeguarding assessments. The documents that that are necessary of an aerodrome operator to conduct an effective safeguarding assessment are set out in Civil Aviation Publication 738 (CAP738) and include: • Plans showing the location of development • A grid reference with at least 6 figures for easting and northing • An elevation of the site to an accuracy of 0.25 m AOD • Details of the dimensions, layout and height of buildings and other structures. For developments located within the 13 km wildlife hazard safeguarding zone around Warton Aerodrome, a policy in the emerging Local Plan should require that any new development in that safeguarding zone is designed so as to not attract additional wildlife, particularly birds. Attracting additional numbers or concentrations of birds into the area could increase the risk of bird strike to aircraft. This could be through measures such as preventing the development of		into the Local Plan to 2042. Policy the expansion of the site beyond its current boundaries whereby the extent of the BAE Warton boundary is defined on the policies map. This shows a reduction in the size of the green belt and an increase in the size of the aerodrome site at the western boundary. The expansion accommodates the future growth of any engineering and testing processes needed and provides flexibility for an optimised layout. The policy acknowledges the proximity of the SPA and RAMSAR sites to the aerodrome's southern boundary and requires Natural England to be consulted on development proposals, potentially requiring a habitat regulations assessment.

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	ponds or watercourses, providing requirements restricting the planting of fruiting species of plants, etc. It should require all applications for planning permission within the 13 km safeguarding zone to be supported by an assessment of wildlife attractant risk that details measures that will be employed to reduce wildlife attractant. In addition, a policy should also protect the Aerodrome from sensitive development that could add additional regulatory requirements on the Aerodrome or restrict operations, for example development that may be sensitive to noise. In accordance with the Agent of Change principle in the National Planning Policy Framework, a policy in the emerging Local Plan should require new development to demonstrate that it would not have adverse impacts or curtail operations at the Aerodrome and any new development should be responsible for implementing any necessary mitigation or avoidance measures. 2. Provide support for additional development and growth of the Aerodrome and the engineering and testing processes that take place there. The existing Aerodrome site is constrained by restrictions around development in close proximity to the operational runway, explosive licences at the Aerodrome, and other technical matters related to the operational runway and aircraft activities. There is		

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	therefore a finite amount of land available within the existing boundaries of the Aerodrome for future development. This limits the ability to which BAE Systems can increase its capacity at the Aerodrome to take advantage of increased demand for engineering and testing services at the Aerodrome. There may therefore be a need in the future to expand the Aerodrome beyond its existing limits in order to provide increased flexibility for future development at the Aerodrome in relation to the types of facilities that could be developed at the Aerodrome and potentially enable optimal layout of development to be achieved. BAE Systems therefore considers that a policy for Warton Aerodrome in the emerging Local Plan should support the expansion of the site beyond its current boundaries and the emerging Local Plan should allocate additional land around the Aerodrome to allow its growth. The ability for the Aerodrome to expand beyond its current borders is constrained by the boundary of the Green Belt being drawn tight to the western edge of the existing Aerodrome site, the boundary of the Countryside designation in the current Local Plan being drawn tight to the eastern boundary of the Aerodrome site, and the location of the River Ribble to the south, which is covered by Ramsar, National Nature Reserve, SSSI, and Special Protection Area designations. As set out in response to Question 41 of the consultation document (below), BAE Systems considers that Fylde Council should		

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	amend the existing Green Belt boundary around Warton Aerodrome to allow the expansion of the Aerodrome. It is considered that the significance of operations at the Warton Aerodrome and the constraints to further development within the existing site provide exceptional circumstances for localised Green Belt amendments around the Aerodrome to accommodate its growth.		
Historic England	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP	No comment.	Comments noted.
National Highways	Q23. WSP agree that there should be specific policies in the LP for the three identified sites, which is recommended to be supported by National Highways. Given the strategic importance and relatively significant volume of potential transport movements associated with the three employment sites, it is recommended that any site-specific policies include provisions for assessing cumulative and site-specific impacts on the SRN.	Q24. Suggested comment that any Strategic Employment Site that requires its own policies is discussed with National Highways as impact on the SRN will need to have been assessed.	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites. Engagement with National Highways is ongoing to support the development of the Local Plan. It is a statutory requirement for National Highways to be consulted on planning applications affecting the Strategic Road Network (SRN).

Respondent name	(23) Do you agree that there should be specific policies in the Local Plan that identify and support the appropriate type of development on the three sites? What do you think the policies should cover?	(24) Are there other major sites in the Borough for which similar policies are needed? If so please explain.	Council Response
	It may be appropriate to request transport assessments for future development proposals, especially where increased freight, employee travel, or infrastructure upgrades could impact the resilience and safe operation of the SRN at the M55 Junctions.		
Office for Nuclear Regulation	Thank you for providing the Office for Nuclear Regulation (ONR) with the opportunity to comment on the 'Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042' being consulted on under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. We are only providing a response to Question 23 as the other questions in the consultation are outwith our scope of responsibility. We fully support the development of a specific policy relating to development within the Detailed Emergency Planning Zone (DEPZ) and other ONR consultation zones around the Westinghouse Springfields site. We have worked with other Local Authorities to develop similar policies for their Local Plans and found it to be beneficial to all parties involved. We are happy to engage with you in developing suitable wording for this policy and look forward to working with you.	n/a	Fylde Council acknowledges and welcomes the supporting comments made in respect of the Strategic Employment Sites. Policy ECD2 relates to the development of the Westinghouse Springfields site.

Respondent name	(23) Do you agree that there should be specific policies in the Local Plan that identify and support the appropriate type of development on the three sites? What do you think the policies should cover?	(24) Are there other major sites in the Borough for which similar policies are needed? If so please explain.	Council Response
PWA Planning for Medicom	A prosperous local economy and a healthy housing market are intrinsically linked. To support the economic ambitions of the borough, as required by the National Planning Policy Framework (NPPF), it is not enough to simply allocate employment land; the Local Plan must also ensure the delivery of high-quality, sustainably located homes to attract and retain the skilled workforce on which key industries depend.	6.2. We support policies that protect and enhance Fylde’s strategic employment sites, particularly BAE Systems at Warton, the engine of the local economy. A thriving high-value economy, however, requires the creation of attractive communities where skilled professionals and their families choose to live. The availability of desirable housing in accessible locations is therefore a critical component of a successful economic development strategy. 6.3. The site at School Farm is uniquely placed to support this objective. Its location, immediately adjacent to the Warton settlement, offers the unparalleled opportunity to deliver new homes within walking and cycling distance of the borough's largest employer. This directly supports the NPPF's goal of creating sustainable patterns of development by reducing the need to travel, minimising congestion, and promoting healthier lifestyles for the workforce. 6.4. Allocating sites in less sustainable, more remote locations would work directly against these economic and sustainability	Fylde Council welcomes the comments supporting the policies for strategic employment sites. Warton is identified as a strategic location for development under policy SLD3. The Local Plan recognises that the presence of BAE systems will allow residents to live close to employment opportunities that can reduce commuting and support the creation of sustainable communities.

Respondent name	(23) Do you agree that there should be specific policies in the Local Plan that identify and support the appropriate type of development on the three sites? What do you think the policies should cover?	(24) Are there other major sites in the Borough for which similar policies are needed? If so please explain.	Council Response
		objectives by increasing out-commuting. 6.5. Therefore, in planning for economic growth, the Council must give significant weight to the role that strategically located housing plays. Allocating a sustainable, previously developed 'Grey Belt' site like School Farm is not just a housing decision; it is a direct and necessary investment in the long-term success of the borough's most important economic asset.	
PWA Planning	6.1. A successful Local Plan must be underpinned by a strategy that fosters a strong, competitive, and resilient local economy. The NPPF places "significant weight on the need to support economic growth and productivity" and requires plans to be flexible enough to accommodate changing economic circumstances. While we support the Council's intention to plan for economic development, the new Local Plan must be more ambitious and market responsive than its predecessor, particularly in supporting the small and medium-sized enterprises that are the bedrock of Fylde's economy. 6.2. Yes, we agree that the three strategic employment sites—BAE Systems at Warton, Westinghouse Springfields at Salwick, and the Blackpool Airport Enterprise Zone—are of national	6.3. At present, these three sites are the clear strategic economic drivers for the borough. However, the Local Plan should be flexible enough to recognise and support other major sites of strategic importance that may emerge during the plan period. The policy framework should not preclude other large-scale employment proposals from being considered on their merits.	Fylde Council welcomes the supporting comments made in respect of the Strategic Employment Sites. The employment land allocations in the Local Plan provide generously for additional strategic growth, significantly in excess of identified requirements. Policy DST5: The Countryside provides for development of unallocated sites outside of settlement boundaries in line with the Framework.

Respondent name	(23) Do you agree that there should be specific policies in the Local Plan that identify and support the appropriate type of development on the three sites? What do you think the policies should cover?	(24) Are there other major sites in the Borough for which similar policies are needed? If so please explain.	Council Response
	and regional importance and warrant bespoke policies within the new Local Plan.		

Respondent name	(25) Do you think the Council should: • Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; • Identify new allocations for employment land; • A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
Alban Cassidy	A mixture of the options above	Other land for economic development has been promoted in our other representations but the potential for data centres should also be considere	n/a	n/a	The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business Park as a new allocation

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
		on existing sites such as Peel Park as a whole and neighbouring land to take advantage of the High Speed Trans Continental Fibre Connection. Any large scale employment sites that have not come forward in the current local plan periods should also be supported for the provision of data centres where access to power and other material considerations indicate that the sites would be suitable.			in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Bryning with Warton Parish Council	A mixture of the options above	No, as the landscape has changed massively in the villages since 2012 and needs to be revisited. A review of brown land	Yes	I believe that a ratio between development and employment land should be set in the village	The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
		sites adjacent to new estates should be reviewed for new opportunities for employment growth and business opportunities. This land can be offered to larger corporations for supplier support etc....			Park as a new allocation in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Christine Abbott	Continue with the existing sites allocated in the current Local Plan (except Naze Lane, Freckleton) and roll the residual land on these forward to cover the period to 2042	If existing employment areas are no longer required, it makes sense to use these for another purpose. I am unable to uncheck the above answer. I am not	No	n/a	The Local Plan continues with existing employment allocations and rolls forward the residual land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local

Respondent name	(25) Do you think the Council should: • Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; • Identify new allocations for employment land; • A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
		familiar with the existing sites. Is there a 'proof of need' required for an employment site. There is no point to just meet a target required and for the site to be vacant.			Plan. Following the recommendations of the employment land review, Naze Lane is no longer allocated. The employment land review concluded that the site has remained undeveloped for some time, being low quality and unlikely to be of interest to other firms.
Claire Parker for Blackpool Council	A mixture of the options above	Please see Supporting Letter, submitted separately, for our comments.	Yes	Please see Supporting Letter, submitted separately, in respect of our comments relating to proposed development at Blackpool Airport Enterprise Zone, including the Silicon Sands campus.	Comments noted. Response in relation to Silicon Sands – see question 23-24.

Respondent name	(25) Do you think the Council should: • Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; • Identify new allocations for employment land; • A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
David Chedd	Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042	Difficult to answer without any explanation of why there is an exception for Naze Lane.	No	As long as there is demand for commercial use of existing employment areas then they should be protected from redevelopment for other uses but if the demand isn't there then it would be better to redevelop than digging up yet more greenfield sites.	The Local Plan continues with existing employment allocations and rolls forward the residual land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local Plan. Following the recommendations of the employment land review, Naze Lane is no longer allocated. The employment land review concluded that the site has remained undeveloped for some time, being low quality and unlikely to be of interest to other firms. Once an employment

Respondent name	(25) Do you think the Council should: • Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; • Identify new allocations for employment land; • A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					site is lost to an alternative use it is unlikely to return to employment land in the future. The Local Plan therefore protects existing employment sites in policy ECD5.
Emma Swindells	A mixture of the options above	n/a	Yes	n/a	The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Ethan Ellison	Identify new allocations for employment land	It's important to have flexibility to allow employment land where businesses want to operate so good to solicit views on preferred locations for longer-term strategies too and LGR.	Yes	n/a	The Local Plan continues with existing employment allocations and rolls forward the residual land. Bradkirk Hall Business park is the sole new employment land allocation in the Local Plan to 2042. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Frank Andrews	Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042	n/a	Yes	n/a	The Local Plan continues with existing employment allocations and rolls forward the residual land. Following the recommendations of the employment land review, Naze Lane is no longer allocated however Bradkirk Hall Farm has been allocated as an employment site. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Gerard Malone	Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042	n/a	Yes	n/a	The Local Plan continues with existing employment allocations and rolls forward the residual land. Following the recommendations of the employment land review, Naze Lane is no longer allocated however Bradkirk Hall Farm has been allocated as an employment site. Once an employment site is lost to an alternative use it is unlikely to return to

Respondent name	(25) Do you think the Council should: • Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; • Identify new allocations for employment land; • A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Hannah Dell'Armi	A mixture of the options above	n/a	Yes	n/a	The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Irene Jacques	A mixture of the options above	Use low quality land.	Yes	n/a	The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					existing employment sites in policy ECD5.
John Leadbeater	A mixture of the options above	n/a	Yes	Employment should gravitate towards the major centres of population and not be artificially created in rural locations - except on a small scale.	Comments noted. The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					existing employment sites in policy ECD5.
John Maskell	Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042	n/a	Yes	n/a	The Local Plan continues with existing employment allocations and rolls forward the residual land. Following the recommendations of the employment land review, Naze Lane is no longer allocated however Bradkirk Hall Farm has been allocated as an employment site. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Keith McKay	Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042	n/a	Yes	n/a	The Local Plan continues with existing employment allocations and rolls forward the residual land. Following the recommendations of the employment land review, Naze Lane is no longer allocated however Bradkirk Hall Farm has been allocated as an employment site. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Linda Nulty	n/a	Whyndyke must be brought forward. Protect Rural areas and productive Farmland. All employment areas need better environmental protection and Landscaping - trees and hedges.	n/a	n/a	Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5. Whyndyke, along with Whitehills, is identified as a strategic location for

Respondent name	(25) Do you think the Council should: • Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; • Identify new allocations for employment land; • A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					development under policy SLD2. This includes a 20 hectare employment land allocation under allocation MA2: Whyndyke Farm.
Lytham St Annes Civic Society	n/a	n/a	Yes	The existing employment areas in Lytham and St Annes should be protected to ensure good employment opportunities in the future.	Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.

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Marcus Dowling	Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042	n/a	Yes	n/a	The Local Plan continues with existing employment allocations and rolls forward the residual land. Following the recommendations of the employment land review, Naze Lane is no longer allocated however Bradkirk Hall Farm has been allocated as an employment site. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects

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					existing employment sites in policy ECD5.
Martin Alderman	A mixture of the options above	n/a	Yes	n/a	The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
P Stanford	n/a	Never allow to use green fields / countryside.	n/a	FBC have allowed a new warehouse at Mill farm that is completely out of character and far, far too big – so is there any point in commenting? It's a monstrosity! And as for the eventual effect on the A585 / M55 junction .. we'll see .. Some cynical people may say that Mill Farm "organisation" just does what it wants .. when it wants ?	Comments noted.
Philip Bickerstaff	A mixture of the options above	n/a	Yes	n/a	The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business Park as a new allocation

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
					in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Stephen and Jacqueline Croft	A mixture of the options above	n/a	No	But it is a case by case question and needs to be properly considered ... so although in general I favour keeping these areas of employment sometimes better option may present themselves ... for example the area by the railway line in	Comments noted. The Council has allocated Bradkirk Hall Business Park as this is actively being promoted for employment uses. Additionally the Council has continued with rolled forward residual

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
				Kirkham may not be viable to maintain a light industrial and it may be better to redevelop some of those and let the businesses move to new and more modern premises more suitable for today's needs.	land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.
Steven Abbott	Identify new allocations for employment land	New allocations for employment land are needed to run alongside the growth of housing proposed. The allocations	No	On Q27 about existing employment areas - the sites and premises involved should not be restricted universally as some will not merit	Comments noted. The Local Plan allocates Bradkirk Hall Farm as a new employment land allocation as this site is

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		must focus on the strategic locations but also accept that opportunities further afield may come forward e.g. on previously developed land. Bradkirk Business Park should be excluded from Open Countryside and allocated as an employment site (Class E, sports, recreation, well-being and health care etc.). The allocation should facilitate expansion land to the south of the existing business park. The site could also be identified as one suitable for residential care facilities as part of the mix. Please refer to my clients Call For Sites		protection. Such restrictions can seriously delay redevelopment for housing or other land uses. Which are restricted should be the subject of consultation with the owners and/or operators. On Q28 -Serious consideration needs to be given to providing sites and buildings for small businesses (including micro as termed in the document) and SMEs. Advice should be taken from well informed commercial agents to understand the market and requirements. This should be a rolling process so that trends and changes are monitored and	actively being promoted for employment uses. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5. An employment land review has been undertaken to support the Local Plan, including reviewing existing employment allocations.

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		submissions this year (ref 24547614).		adjustments made accordingly.	
Susan Lee	A mixture of the options above	n/a	Yes	n/a	The Council has continued with rolled forward residual land whilst also designating Bradkirk Hall Business Park as a new allocation in the Local Plan. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5.

Respondent name	(25) Do you think the Council should: - Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; - Identify new allocations for employment land; - A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
Blackpool Council	n/a	Blackpool Airport Enterprise Zone and Economic Growth - Blackpool Council supports Fylde's recognition of the strategic economic role of the Blackpool Airport Enterprise Zone. In terms of employment land, we note the acknowledgement that Fylde has previously provided 14ha of employment land in the current Local Plan to meet unmet need within Blackpool.	n/a	Blackpool Airport Enterprise Zone and Economic Growth - Blackpool Council supports Fylde's recognition of the strategic economic role of the Blackpool Airport Enterprise Zone. In terms of employment land, we note the acknowledgement that Fylde has previously provided 14ha of employment land in the current Local Plan to meet unmet need within Blackpool.	Comments noted. Fylde Council acknowledges and welcomes the supporting comments made in respect of Blackpool Airport Enterprise Zone. The site has been allocated as an employment site under policy ECD3 in the Local Plan to 2042 in recognition of its strategic importance.
Environment Agency	Employment land in Fylde should be located in the most sustainable locations. In relation to our remit we would recommend that:-	Employment land in Fylde should be located in the most sustainable locations. In relation to our remit we	n/a	n/a	Comments noted. The Environment Agency is a statutory consultee and is a specific consultation

Respondent name	(25) Do you think the Council should: • Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; • Identify new allocations for employment land; • A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
	• New employment land allocations must not be located in Flood Zone 3b. • New employment land must avoid areas of Flood Zone 2 and 3 unless there are no sequentially preferable sites at a lower risk of flooding AND the site satisfies the requirements of the Exception Test (if necessary). • New employment land should not be located in areas where climate change could unacceptably increase flood risk, such as those in Flood Zone 1 but the LPA's strategic flood risk assessment (SFRA) or the flood map for planning show it will be at increased risk of flooding from rivers or the sea in future. • New units should not be located over or within 8 metres of the bank top of a designated Main River.	would recommend that:- • New employment land allocations must not be located in Flood Zone 3b. • New employment land must avoid areas of Flood Zone 2 and 3 unless there are no sequentially preferable sites at a lower risk of flooding AND the site satisfies the requirements of the Exception Test (if necessary). • New employment land should not be located in areas where climate change could unacceptably increase flood risk, such as those in Flood Zone 1 but the LPA's strategic flood risk assessment (SFRA) or the			body when consulting on Local Plans, development plan documents and strategic planning allocations. When reviewing the sites submitted in the call for sites process, each submission was evaluated in terms of flood risk and likelihood of future flood risk when accounting for climate change using the Level 1 Strategic Flood Risk Assessment (SFRA). A level 2 SFRA will be carried out as necessary.

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	• Any watercourses on sites should be retained and the layout of new employment sites should ensure that watercourses are utilised as a key feature or benefit. Where possible, they should be improved to provide biodiversity net gains in the aquatic environment. Careful site design should avoid development along the edges of watercourses to retain a natural habitat corridor along watercourses and future climate resilience. • The re use of previously developed sites provides opportunities for sites to be cleaned up and remediated making them safe for future users and reducing potential pollution risks to the water environment. • Locating new employment areas in locations that would be less	flood map for planning show i t will be at increased risk of flooding from rivers or the sea in future. • New units should not be located over or within 8 metres of the bank top of a designated Main River. • Any watercourses on sites should be retained and the layout of new employment sites should ensure that watercourses are utilised as a key feature or benefit. Where possible, they should be improved to provide biodiversity net gains in the aquatic environment. Careful site design should avoid development along the edges of watercourses to			

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	sensitive to operations or activities that require regulation by the Environment Agency is recommended	retain a natural habitat corridor along watercourses and future climate resilience. • The re use of previously developed sites provides opportunities for sites to be cleaned up and remediated making them safe for future users and reducing potential pollution risks to the water environment. • Locating new employment areas in locations that would be less sensitive to operations or activities that require regulation by the Environment Agency is recommended			

Respondent name	(25) Do you think the Council should: • Continue with the existing sites allocated in the current Local Plan (except Naze Lane Freckleton) and roll the residual land on these forward to cover the period to 2042; • Identify new allocations for employment land; • A mixture of the options above	(26) Please add any further comments you have about allocations of employment land.	(27) Do you support the protection of the existing employment areas (industrial estates and office parks) from redevelopment for other uses?	(28) Do you have any other comments about how the new Local Plan should provide for employment land needs?	Council Response
Historic England	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP	No further comment at present.	No comment.	No comment.	Comments noted.
National Highways	Q25. WSP recommend that National Highways supports the continuation of existing sites allocated in the current LP, given	Q26. See comment above.	Q27. WSP recommend that National Highways supports the protection of existing	Q28. The Employment Land Review indicates continued demand for small industrial units and confirms sufficient	Comments noted. National Highways is a statutory consultee and is a specific consultation body when consulting on

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	that it is understood that these will have been previously assessed in terms of travel demand. The identification of new allocations, particularly employment land, would require careful consideration to ensure that those sites meet with the new LP Vision and are appropriately supported by TDM measures principally active travel and sustainable modes of transport (in line with DfT Circular 01/2022). Any new allocations should be considered through the plan process and appropriate liaison undertaken with National Highways.		employment areas from redevelopment. Please see comment above.	land supply to 2042. Industrial units and operations are typically road-reliant by their nature. National Highways recommends assessment to quantify impacts and identify mitigation measures, where required, to maintain safety and resilience of the SRN. It is recommended that any employment site allocations, especially those near the SRN, are appropriately assessed to understand impact and are supported by the appropriate infrastructure to ensure the resilience and safe operation of the SRN.	Local Plans and development plan documents and strategic planning allocations. The Local Plan to 2042 continues with the existing employment allocations and rolls forward the residual land. Bradkirk Hall Business park is the sole new employment land allocation in the Local Plan to 2042. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan

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					therefore protects existing employment sites in policy ECD5.
PWA Planning for Pringle Homes	n/a	6.1. Pringle Homes recognises that a prosperous local economy and a healthy housing market are intrinsically linked. To support the economic ambitions of the borough, it is not enough to simply allocate employment land; the Local Plan must also ensure the delivery of high quality homes required to attract and retain the skilled workforce on which key industries depend. 6.2. We support policies that protect and enhance	n/a	n/a	Comments noted. The strategic employment sites of BAE Systems, Warton, Westinghouse Springfields and Blackpool Airport Enterprise zone are allocated under policies ECD1, ECD2 and ECD3 respectively. The Local Plan recognises that the strategic employment sites will generate demand for housing given that people will want to live close to work. This stimulates further housing

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		Fylde's strategic employment sites at BAE Systems, Westinghouse Springfields, and the Blackpool Airport Enterprise Zone. These high value employers are the engines of the local economy, and their continued success is vital for the borough's prosperity. 6.3. A thriving economy, however, requires more than just places to work; it requires the creation of attractive communities where skilled professionals and their families choose to live. The availability of high-quality executive and family housing is a critical			development in the area to support people employed locally, reducing the time spent commuting.

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		component of economic development, directly influencing a company's ability to attract and retain top talent. 6.4. The proposed development at Greenlands Farm, Wrea Green, is a prime example of a scheme that directly supports Fylde's economic strategy. By delivering superior quality, Arts and Crafts-inspired family homes in a highly desirable and sustainable village location, Pringle Homes will provide the exact type of housing needed to appeal to the professionals working at nearby strategic sites like BAE Systems in			

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		Warton. 6.5. Therefore, in planning for economic growth, the Council must give significant weight to the role that high-quality housing plays. Allocating sustainable, deliverable, and attractive housing sites like Greenlands Farm is a direct investment in the borough's economic future.			
PWA Planning	6.4. We support a mixture of the options above. The new Local Plan should retain the most viable and deliverable of the existing allocated sites while also proactively identifying new allocations to create a more diverse, flexible, and responsive portfolio of employment land	6.8. Expand the Mill Farm Sports Village (MUS3) Allocation: The strategic location of the Mill Farm site, particularly with the forthcoming opening of Junction 2 of the M55 via the Preston Western Distributor road,	6.9. Yes, we support the protection of existing employment areas from redevelopment for other uses, such as housing. 6.10. The Council's own ELR evidence	6.7. Support for Ancillary Uses: To create successful and sustainable employment locations, the Plan must adopt a more modern and flexible approach to ancillary uses. The success of modern business parks is often supported by on-site facilities	Comments noted. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly where employment land is redeveloped for housing. The Local Plan

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	for the period to 2042. 6.5. While the Council's Employment Land Review (ELR) suggests there is a sufficient quantum of land in the existing supply pipeline, this headline figure masks a critical market reality. The ELR itself identifies that the vast majority of market demand is for small starter and grow-on units (below 500m²) and that the current occupancy rate of 97.9% indicates a clear shortage of available premises. 6.6. The current strategy's focus on a small number of large, strategic sites is failing to meet this evidenced need for smaller-scale premises for the B2 (General Industrial), B8 (Storage and Distribution), and Class E(g) (Light Industrial) sectors. These are	significantly enhances its suitability for further employment growth. This new infrastructure, combined with evolving, more flexible work patterns (e.g., less daily commuting to BAE Warton), creates a compelling case for expanding the allocation. We strongly recommend that the allocation MUS3 is extended to cover all land up to Fleetwood Road to maximise this sustainable economic opportunity.	demonstrates an extremely high occupancy rate, proving these sites are a vital and actively used resource for local businesses. Allowing the piecemeal loss of this finite stock would undermine the borough's economic base and directly contradict the NPPF's objective of supporting a prosperous economy. The existing Local Plan's Policy GD8 provides a robust framework for testing the viability of existing employment uses	such as childcare nurseries, gyms, cafes, and other local services. Prohibiting such uses and rigidly applying a 'town centre first' approach is counterproductive. It works against the NPPF's principles of building a strong economy, promoting healthy communities, and achieving sustainable development by forcing unnecessary car journeys. The new Plan should include a positive policy allowing for a proportionate level of ancillary and complementary uses within major employment allocations.	therefore protects existing employment sites in policy ECD5. Policy GD8 in the Local Plan to 2032 has been superseded by policy ECD10: Demonstrating Viability. Regarding alternative and supporting uses, Land in commercial/employment uses will be retained as such under ECD6 unless it can be demonstrated that there is no reasonable prospect of a site being used for those purposes, satisfying the requirements of policy ECD10. Proposals for alternative uses will also have to satisfy other

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	the spaces required by the micro-businesses that the Spatial Portrait identifies as making up 84.5% of the borough's enterprises. The new Local Plan must rectify this by allocating and be supportive of windfall applications a range of smaller, accessible sites across the borough to meet this demand.		before considering a change of use, and a similarly robust policy should be carried forward into the new Plan.		Local Plan policies, including DSA1.
Steven Abbott Associates for Bradkirk Business Park	New allocations for employment land are needed to run alongside the growth of housing proposed. The allocations must focus on the strategic locations but also accept that opportunities further afield may come forward e.g. on previously developed land.	Bradkirk Business Park should be excluded from Open Countryside and allocated as an employment site (Class E, sports, recreation, well-being and health care etc.). The allocation should facilitate expansion land to the south of the existing business park. The	The sites and premises involved should not be restricted universally as some will not merit protection. Such restrictions can seriously delay redevelopment for housing or other land uses. Which are restricted should be	Serious consideration needs to be given to providing sites and buildings for small businesses (including micro as termed in the document) and SMEs. Advice should be taken from well informed commercial agents to understand the market and requirements. This	Comments noted. Bradkirk Hall Business Park is the sole new employment land allocation in the Local Plan to 2042. Once an employment site is lost to an alternative use it is unlikely to return to employment land in the future, particularly

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		site could also be identified as one suitable for residential care facilities as part of the mix. Please refer to my clients Call For Sites submissions this year (ref 24547614).	the subject of consultation with the owners and/or operators.	should be a rolling process so that trends and changes are monitored and adjustments made accordingly.	where employment land is redeveloped for housing. The Local Plan therefore protects existing employment sites in policy ECD5. Land and premises will be retained in commercial and employment use unless it is demonstrated that there is no reasonable prospect of the site being used for those purposes. Proposals for alternative uses will have to satisfy Local Plan policy ECD10 and other Local Plan policies, including DSA1.

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Turley for Strategic Land Group	n/a	Economic Development 1.35 The IVSD provides an overview of future employment land and asks a series of questions which relate to existing strategic employment sites and future employment provision. 1.36 SLG does not have any employment land interests in the Borough but would like to reiterate the need for the Local Plan to be informed by a robust evidence base which includes an assessment of economic needs and an up-to-date assessment of employment land supply across the	n/a	n/a	Comments noted. The Local Plan is supported by the Fylde Coast Economic Needs Update and Employment Land Review.

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		borough. 1.37 This evidence base needs to be prepared in light of recent changes to national policy drivers and requirements in respect of economic development which are set out in the UK's Modern Industrial Strategy and chapter 6 of the National Planning Policy Framework. As identified above, the area is emerging as an attractive location for aviation, energy, creative, digital, advanced manufacturing and professional services and the development needs of these sectors of the economy need to be fully appraised to ensure			

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		their needs of specifically recognised and supported over the plan period.			
United Utilities	n/a	n/a	n/a	UUW wishes to highlight the need for early dialogue on potential employment allocations so that infrastructure constraints can be understood as soon as possible. It is important to explain that there are emerging uses / industries which are high users of water. Applicants should not assume that such water can be provided without significant cost or delay which may arise as a result of a need for the delivery of infrastructure improvements.	Comments noted. United Utilities as the water undertaker is a specific consultation body and it is a statutory consultee for Local Plans, development plan documents and strategic planning allocations.

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				UUW believes that significant value can be added to the planning system by ensuring that all sites are identified as site-specific allocations with associated policy wherever possible. UUW believes that a site-specific allocation has added benefit as it allows us to undertake early site-specific assessment to identify any key constraints and risks, for example, an on-site flood risk or a known infrastructure constraint. Such an approach also makes expectations clearer to developers.	

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
Bryning with Warton Parish Council	Yes, Involve the local parish councils and align responsibility and some accountability for the management of maintenance.	This is outside of the remit of BWPC.	Comments noted.
Christine Abbott	I believe all the coastal areas should have the maximum level of protection, along with SPA and SSSI's. We have a fraction of sand dunes and coastlines left due to erosion/development. The sites themselves are unique, precious and sensitive and the protection afforded should reflect this.	I believe the dunes should be given the highest level of protection. I would say that recreational activities be restricted on the beach at certain times, e.g seabird breeding season. This restriction may also encourage visitors to respect the area and remind them that it is also a unique habitats.	Fylde's coastline includes the Ribble Estuary which is a Special Protection Area and a Ramsar site. These are international designations whereby the biodiversity and habitats are given the highest degree of protection. The Lytham St Annes Sand Dunes and the Sand Dunes between St Annes and Blackpool are a designated Site of Special Scientific Interest (SSSI). This is a national designation that affords a high degree of protection. Details on Fylde's protected coastal and wetland assets are given in Local Plan policy ENT6.
David Chedd	Yes	Environmental protections should take priority over recreational use.	As detailed in Local Plan policy ENT6, the Lytham St Annes Sand Dunes are a designated Site of Special Scientific Interest (SSSI). The biodiversity and habitats that the sites provide for are protected by international agreement, affording the highest degree of protection.

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
Gerard Malone	Yes	Can't see any	Comments noted.
Hannah Dell'Armi	no, since the windfarm cabling is likely to be allowed to run right through these I don't think the local plan is very effective in that regard.		Comments noted.
Irene Jacques	Coastal areas seem well protected. Regular beach cleaning by the Council and volunteers.	Signage/fencing needs to be more prominent as many people sit in the dunes damaging dune planting / lighting BBQs.	Comments noted. The Sand Dunes are a designated Site of Special Scientific Interest (SSSI). The biodiversity and habitats that the sites provide for are protected by international agreement, affording the highest degree of protection (see Local Plan policy ENT6). Public Space Protection Orders (PSPOs) relating to barbeques and outdoor cooking are currently in place until 30/06/2028. More information can be found on the Council's website at https://new.fylde.gov.uk/bbqs/ .
John Maskell	FBC must resist government overruling its protections	No	Comments noted.
Keith McKay	Carry On!		Comments noted.
Linda Nulty	Bio Heritage areas should be included e.g. Wesham Marsh		Comments noted.

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
Lytham St Annes Civic Society		We believe that it is the largely undeveloped nature of the LSA coastline which is its main attraction. Hundreds of people walk there every day. Yet there is always pressure from commercial interests to provide various amenities on the beach and foreshore such as hospitality and retail. Such pressure on the foreshore next to Lytham Green has been enormous and has been successfully resisted by local residents and the Civic Society over the last fifty years. In our view such development not only destroys what residents love but what visitors come to experience. We strongly believe that retail and hospitality outlets must be kept within the envelopes of existing developments such as Lytham town centre, Fairhaven Lake, Ansdell centre, and the already commercialised areas of St Annes beach. We were surprised that a recent café development on the site of the sand yachting Club between St Annes and Blackpool obtained planning consent. It is thankfully set back in the dunes, and we hope that there will be no extension of this facility and no precedents have been set. Another obvious reason for opposing any such further coastal development is that it is likely to damage the viability of the existing town centres. If visitors come into the centres for	The coastline is a significant component of Fylde’s leisure offer as a seaside resort. It is acknowledged that a balance must be struck between the conservation of the natural environment and sustainable development. Sufficient protections are in place including both SPA and Ramsar designations that safeguard the Ribble Estuary and Morecambe Bay Estuary falling within Fylde. The SPA and Ramsar designations are secured through international agreement, whereby the biodiversity on the sites and the habitats have the highest degree of protection. The Fylde Coastline is further protected through a series of SSSI designations, applying to the Ribble Estuary, and sand dunes at Lytham St Annes. Policy ENT7: Coastal Chage Management Areas permits sustainable development in the coastal areas provided that it is appropriate for a coastal location and promotes the conservation, restoration and enhancement of the coastline. This reflects the ‘hold the line’ policy in the Shoreline Management Plan.

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
		refreshment, they are likely to visit the shops. The threat to undeveloped coastline has been clearly seen recently in the attempt to place a licensed restaurant on Granny's Bay which was successfully challenged by local residents and the Civic Society, and a planning consent was revoked after judicial review. There is a particular threat to Lytham Green from over use. More and more frequently it is being used as a car park and events such as the Lytham Festival takes a large proportion of the Green out of use for 3-4 weeks each year. The impact of this use should be considered in relation to the residents on both sides of the Green – the people on one side and the wildlife on the other. We believe that these coastal spaces, whether foreshore, green areas, or beach should be categorised as important open spaces, just as inland areas are treated. This approach supports an important part of the character of the area which is naturally dominated by its coast.	With regards to the frequency of use, Lytham Green is a strategically important asset recognised as a multifunctional events space. Under policy ENT2 development proposals that causes harm to or loss of Local Green Spaces or their important features, or undermines the purposes of their designation, will be refused. It is also identified under policy ECD8 where key tourism assets will be protected. Being identified as a Local Green Space gives significant protection to Lytham Green. Lytham Green is significant for providing the open setting for Lytham and its heritage features and the frequency of use for Lytham Green is crucial in supporting Fylde's seaside resort tourism offer and events calendar.
Marcus Dowling	Yes		Comments noted.
P Stanford		No Not sure the "summer" dog exclusion zone is a	Comments noted.

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
		great idea – might suggest that early morning / evening should be allowed during summer .. say .. before 9 after 6 ?	
Stephen and Jacqueline Croft	Probably not - given off shore electricity cable routes ...	Not aware of such	Comments noted.
Environment Agency		The sand dunes and saltmarsh areas are both deemed irreplaceable habitats in the UK and should not be impacted by recreational users. These areas will benefit from demarcation to prevent footfall damage within these fragile habitats to encourage expansion and establishment. Designated footpaths / diversions and boardwalks will go some way to achieving this.	The St Annes Sand Dunes and Salt Marsh are located within the Coastal Change Management Areas. Policy ENT7 details that the open and coastal character will be protected and lists the circumstances in which development will be permitted, requiring development to be appropriate and in keeping with the open character of the coastline. Development must not interfere with natural coastal processes or detract from the tourism value. This provides protection for the sand dunes and saltmarsh areas in the borough whilst accommodating the recreational and tourism uses of Lytham and St Annes as a classic seaside resort.
Historic England	The Local Plan should provide appropriate policies that conserve and enhance the historic environment, heritage assets and their setting. It should also look to sustain and enhance local character and identity.	Any proposal should avoid harm to the significance of heritage assets and their settings.	Comments noted. The Council will plan for leisure, culture and tourism by promoting the principles of sustainable tourism. This is detailed in policy ECD8: Leisure, Culture and Tourism Development, that looks to protect

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
			and support the realisation of the potential of Fylde's heritage assets. This includes the Promenade Gardens and Ashton Gardens, St Annes Pier, Lytham Hall and its historic parkland, Lytham Windmill and Lowther Pavillion and Gardens. General principles relating to the development of the Historic Environment are given in strategic policy ENT1: Historic Environment. This requires development proposals to conserve, protect and, where appropriate, enhance the historic value of Fylde's heritage assets.
National Highways	Q29. WSP recommend 'no comment' to this question.	Q30. WSP recommend 'no comment' to this question.	Comment noted.
PWA Planning	7.1. We recognise and support the need to protect the borough's most valuable environmental and heritage assets. A high-quality environment is a key component of sustainable development and is integral to Fylde's identity and economic prosperity. However, protectionist policies must be proportionate, evidence-based, and applied in a manner consistent with the NPPF. Protection must be about managing change, not preventing it. Overly restrictive or outdated local designations can stifle sustainable growth, and the new Local Plan is an opportunity to ensure that the	7.3. Yes, there is an inherent tension between protecting sensitive habitats and promoting recreational use and tourism. However, these objectives are not mutually exclusive. The new Local Plan should resolve this conflict through a positive management strategy, rather than one of blanket restriction. 7.4. Development that enhances the visitor experience (e.g., cafes, improved access paths, interpretation centres) should be supported where it can be demonstrated that impacts on sensitive habitats can be appropriately	High level protections are referenced in Policy ENT6 that details those areas of Fylde protected by international SPA and Ramsar designations and those SSSI's provided national protection. Striking a balance of promoting tourism uses whilst protecting sensitive habitats is acknowledged in the New Local Plan to 2042. Policy ENT7 promotes the conservation, restoration and enhancement of the

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
	balance between protection and development is correctly struck. 7.2. The protections for internationally and nationally designated sites (Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest) are mandated by legislation and the NPPF and are therefore suitable and necessary. The Local Plan must contain robust policies that reflect these high-level protections.	mitigated. Such development can also be a key funding mechanism for habitat management and enhancement schemes, creating a symbiotic relationship where a vibrant visitor economy directly supports the conservation of the natural assets it depends on.	coastline, requiring project-specific Habitat Regulations Assessments for any tourism and coastal defence developments near to the Ribble and Alt Estuaries SPA/Ramsar or Morecambe Bay and Duddon estuary SPA/Morecambe Bay Ramsar. The HRAs will need to demonstrate that there will be no likely significant effect upon European Sites before the tourism and coastal defence developments can be granted consent. Furthermore, policy ECD8 notes that the Council will plan for leisure and tourism by protecting important natural assets that attract visitors, including the sand dune coastal landscape and the beach. ECD8 also requires project-specific HRAs for any tourism and coastal defence developments near to the Ribble and Alt Estuaries SPA/Ramsar.
United Utilities	Biodiversity Net Gain As part of our response to the Environment Act and the delivery of biodiversity net gain (BNG), we are currently reaching out to local authorities to ensure we develop a BNG strategy that, wherever possible, supports local biodiversity and nature recovery needs. Although the land we own is primarily		Biodiversity net gain and any contributions sought from development proposals, whether this be on-site or off-site contributions, will be determined in line with legislation.

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
	operational land, we are currently evaluating all land owned by UUW within local authorities that could be used for habitat creation or enhancement works and developing a list of candidate sites. In identifying land, we clearly recognise the strategic importance of aligning our site selection process with local, regional and national policies and objectives on biodiversity and nature recovery. As part of the preparation of your new local plan, we would welcome the opportunity to further discuss your approach to the delivery of BNG and the identification of strategic opportunities to support local nature recovery. We are keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure which is often very geographically restricted and critical to meeting future growth and environmental drivers. We request that your policy includes sufficient flexibility to allow for off-site provision. This is particularly in respect of existing and new infrastructure sites. On-site provision may not be the most appropriate long-term solution for the delivery of BNG when investing in key infrastructure such as water and wastewater assets. BNG should be resilient to future pressures from further development. It is critical that land at and around our key infrastructure sites is not sterilised to		

Respondent name	(29) Are the protections for coastal areas set out in paragraphs 6.2 to 6.5 suitable? Do you have views on how the Local Plan should ensure that protections are effective?	(30) Are there conflicts between the protections of the estuary and dunes, and the recreational use of the beach and promenade? If so, how should these be resolved?	Council Response
	ensure that we are able to flexibly and most appropriately respond to future growth and environmental drivers. We also wish to note that biodiversity mitigation / enhancement should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity.		

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
Anna Briggs	Yes, more of the beach should be a conservation area.	n/a	n/a	The council is assessing built environment areas. Beaches shall continue to be protected from inappropriate development in the Local Plan.
Bryning with Warton Parish Council	Yes, Where the birds migrate to on the Fylde Coast (Newton, Warton, Freckleton/Clifton marsh) and potentially solar farms	Pass on some accountability to the parish councils/heritage groups and involve all stakeholders.	A review of assets on a case by case basis should be adopted ie Fairhaven Lake through consultation events asking those who will be affected.	The council is assessing built environment areas. Marshes shall continue to be protected from inappropriate development in the Local Plan. The Council's Heritage Strategy enshrines using parish councils and other groups at potential conservation area stage. The public can nominate assets to be considered for the Local list. Two buildings

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				at Fairhaven Lake are locally listed
Christine Abbott	Yes, Fairhaven Lake.	Preserving/enhancing the character and appearance of assets in the Conservation Area is important. The boundary should not be reduced.	Yes.	The council shall review the historic environment at Fairhaven Lake & Inner Promenade area to consider conservation area designation. The Council is considering widening the boundary of some Conservation Areas and is not considering making areas smaller.
David Chedd	n/a	Local listing	Yes	The public can nominate assets to be considered for the Local list.
Ethan Ellison	Yes, have added weight and protection to resist poor development.	n/a	n/a	Policy supports development which makes a positive contribution to the historic environment and allows development that is harmful to be refused. The policy

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				shall be carried forward to the new Local Plan.
Gerard Malone	No	go easy. Light touch please.	No	The Local Plan Policy allows refusal of development which would remove, harm or undermine the significance of a locally important heritage asset; locally listed assets have less protection than nationally listed assets. The council recognises that heritage is one of many relevant considerations in determining planning applications
Irene Jacques	n/a	n/a	Maybe a notice board (physical or digital) to inform residents of any projects/work the council is doing to help slow climate change.	Comment noted

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John Maskell	No	Heritage assets should be protected at all costs	Yes	The Local Plan Policy allows refusal of development which would remove, harm or undermine the significance of a locally important heritage asset; locally listed assets have less protection than nationally listed assets. The council recognises that heritage is one of many relevant considerations in determining planning applications
Keith McKay	Personally, I would value a discussion regarding Freckleton Centre options before committing one way or the other.	Consultation of local knowledge would be appropriate on this issue, especially with regard to the undesignated category and the implications therein.	Possibly	Government guidance encourages local community engagement and Fylde Council consults during the designation process

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Linda Nulty	n/a	Assets in every Town and Parish	Yes - ask all Towns and Parishes - not just what is identified by Urban core of LSA officers	The public can nominate assets to be considered for the Local list.
Lytham St Annes Civic Society	All conservation areas need to be reviewed for adequacy and additional conservation areas need to be considered. An example of a change that should be considered would be the inclusion of Melton Grove - by the renowned architect Tom Mellor, and Church Drive to protect the remaining undeveloped houses, in the Lytham Avenues conservation area. Other changes to the conservation we would suggest are: Extend the Lytham CA Extend the St Annes Road East CA	There is little mention here of Listed Buildings. The most recently designated have largely been put forward by the Civic Society and a review is due, particularly to include significant C20th buildings. We would like to see greater care taken in considering applications to alter Listed Buildings, particularly relating to interior details, windows, doors and layouts. Otherwise, they are being given only the same protection as being in a Conservation Area. The list of Local Heritage Assets also needs reviewing regularly with as much residents' involvement as possible.	Yes	The areas that the respondent mentions shall be reported for recommendation or for not recommending conservation area designation. National Planning Policy Framework (NPPF) sets out national policy and the councils duties to conservation across the entire built and historic environment. The council intends to review the historic environment throughout the borough.

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
	Set up CAs which cover: St Thomas's Road from the railway to the Grand Hotel on the Inner Promenade King Edward Avenue to Riley Avenue – from the Inner Promenade to the railway line. Fairhaven Ansdell			
Marcus Dowling	The centres of all settlements to ensure the current settlement centres character are maintained	n/a	n/a	The council intends to review the historic environment throughout the borough.
Mrs B Wildish	The areas of Fylde that have developed since Roman times and particularly over the last 200-300 years include Clifton, Freckleton, Kirkham, Lytham and Ansdell should all have their heritage, character and history protected.	n/a	n/a	The council intends to review the historic environment throughout the borough.

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P Stanford	Kirkham Market Square ? Kirkham Town end ? Wesham – next to war memorial ? Wrea Green village green ?	n/a	Yes – Lytham Green should be protected – even if that means changes to Lytham proms – or curtailing their ever-increasing demand IMHO its far to big now – should be 3/4 nights max	The council intends to review the historic environment throughout the borough. Lytham Green is included in the conservation area so is protected from inappropriate development. The council is aware that the community has mixed opinion of the annual Lytham Festival using the Green and enacts its licencing powers
Stephen and Jacqueline Croft	Yes - should be led by the local communities	Set an obligation and support consultation and best practice	... its seems like a basic on-going requirement to keep this under review	Government guidance encourages local community engagement and Fylde Council undertakes consultation during the designation process
Gladman	4.6.1 Gladman submits that the designation of additional	n/a	4.6.2 Gladman submits that the Council should	The Local Plan acknowledges that public benefits of the

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
	conservation areas should only be pursued where robust and proportionate evidence exists to justify such a designation. Given that conservation area status has the potential to constrain future development opportunities, any proposed designation must be supported by a thorough and objective appraisal. This appraisal should clearly demonstrate that the designation of a conservation area is both necessary and appropriate.		only consider designating additional non-designated heritage assets within the borough where robust and proportionate evidence exists to justify such a designation. Whilst the conservation of non-designated heritage assets is important, it is equally vital that such designations do not unnecessarily undermine the delivery of sustainable development. Therefore, it is essential that the designation of non-designated heritage assets is clearly justified through a rigorous and evidence-based process.	development are weighed against the harm to heritage asset based on a balanced judgement. The Council intends to carry this balance forward to the new Local Plan
Historic England	No comment.	Historic England has produced guidance on Local Plans and the historic environment.	No comment.	Comments noted.

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
		What follows is a summary of historic environment policy expectations. https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/) Strategic policies Local Plans should include strategic policies to conserve and enhance the historic environment of the area and to guide how the presumption in favour of sustainable development should be applied locally. It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and any Neighbourhood Plans that come forward are required to be in general conformity with the strategic policies of the Local Plan. The strategic policies for the historic environment will derive from the overall strategy to deliver conservation and enjoyment of the area's heritage assets for generations to come. These may be policies		The guidance will be considered as part of preparing the Local Plan.

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
		that concern themselves specifically with the development of types of heritage asset. But delivery of the NPPF objective may also require strategic policies on use, design of new development, transport layout and so on. Indeed, every aspect of planning can conceivably make a contribution to conservation. Plan policies in all topics should be assessed for their impact on the strategic conservation objective. Conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF objectives. The Local Plan should also consider the role which the historic environment can play in delivering other planning objectives: • Building a strong, competitive economy • Ensuring the vitality of town centres • Supporting a prosperous rural economy • Promoting sustainable transport • Supporting high quality communication infrastructure • Delivering a wide choice of high quality		

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		homes • Requiring good design • Protecting green belt land • Meeting the challenge of climate change, flooding and coastal change • Conserving and enhancing the natural environment • Facilitating the sustainable use of minerals In formulating the strategy it is advisable and often necessary to consider the following factors: • How the historic environment can assist in the delivery of the vision and the economic, social and environmental objectives for the plan area; • How the Plan will address particular issues identified during the development of the evidence base including heritage at risk; • The interrelationship between the conservation and enhancement of the historic environment and the other Plans policies and objectives;		

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		• The means by which new development in conservation areas and within the setting of heritage assets might enhance or better reveal their significance; • How local lists might assist in identifying and managing the conservation on non-designated heritage assets; • How the archaeology of the Plan area might be managed; • How CIL funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified; • Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed; • What implementation partners need to be identified in order to deliver the positive strategy; • What indicators should be used to monitor the effectiveness of the strategy. Development Management Policies		

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
		In terms of development management policies, it is clear that the NPPF expects plans to include detailed policies, which will enable a decision maker to determine a planning application. The Local Plan for Fylde should include specific policies for the historic environment in order to help inform decisions that affect it and others should where possible cross-reference heritage related issues. Key issues to be considered are (not wholly comprehensive): • Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc). • Designated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc). Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc). • Archaeology including remains of less than national importance.		

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
		• Conservation areas • Registered parks and gardens • Heritage at Risk • Important views and vistas • Landscape character • Local character and distinctiveness • Individual settlements • Historic shopfronts and advertisements • Public realm • Design • Information to accompany an application. All preferred development should be supported by a robust evidence base for the historic environment. There has to be evidence (including within the SEA) to show that site allocations in the Local Plan have been informed by an evaluation of the impact which development might have upon those elements that contribute to the significance of heritage assets including their setting. Historic England's approach to dealing with this requirement of the NPPF is set out in our Advice Note No.3: Site Allocations		

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		(HEAN3). It contains a step-by-step guide to site selection in order to safeguard and enhance the historic environment. The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their settings (under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990). Where potential development sites appear to include or otherwise impact upon non-designated assets (including the possibility for archaeology), their potential should be investigated and retention / exploration should be promoted. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate: 1. What contribution the site in its current		

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		form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution. 2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets. 3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level. 4. If the harm cannot be reduced or removed, what the public benefits are that outweigh the presumption in favour of the conservation of the heritage asset The selection of sites for development needs to be informed by an up-to-date evidence base and the Local Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the area. Where harm is unavoidable, the Plan should consider how		

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
		this might be avoided or mitigated. This could include measures such as a reduction in the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Sometimes it might be necessary to delete a proposed allocation and seek to meet any public benefits it might have achieved on another site. Such decisions need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm. The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to remove heritage from risk. The proposed mitigation measures put forward should be included where there are policies for allocated sites (or tied into the plan) and they will need to refer to identified historic environment attributes to guide how development		

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
		should be delivered. In addition to the above, any strategic locations and their accompanying policies maybe for areas which affect both designated and non-designated heritage assets, as well as distinctive places with their own unique character and identity. Policies and proposals for these locations should recognise the role that heritage can play to ensure that they appropriately conserve and enhance all aspects of the historic environment, including elements which contribute to the area's unique identity and character, as well as maximising opportunities for its enhancement through regeneration proposals. There needs to be evidence which looks at the allocation and whether the site can accommodate the proposed quantum of development without harm to the significance of the asset and its setting, and this should be then included within the site policy.		

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
		Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP.		
National Highways	Q31. Whilst National Highways would unlikely provide comment, WSP note that any Conservation Areas near or adjacent to the SRN should be discussed with National Highways to ensure that assets are protected.	Q32. WSP recommend 'no comment' to this question.	Q33. WSP recommend 'no comment' to this question.	All relevant agencies including National Highways would be consulted on any proposed new Conservation Area
PWA Planning	7.5. No. The borough already has a comprehensive suite of	7.6. The Plan should adopt a policy that directly reflects the balanced and	7.5. No. The borough already has a	The Government recognises that part of the public value

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
	designated and non-designated heritage assets, identified through previous Local Plans and the recent Local Listing Project. The focus of the new Local Plan should be on the positive management and enhancement of these existing assets, not on creating further layers of designation which risk devaluing the concept and creating unnecessary constraints on development.	proportionate approach of the NPPF. It should not seek to duplicate national policy but provide a clear local framework for its implementation. The policy must recognise that conservation is about the management of change, not the prevention of it. It should explicitly support development that secures the optimum viable use of a heritage asset and acknowledge the role that well-designed enabling development can play in securing the future of assets at risk, in line with NPPF paragraph 221. The policy should apply the NPPF's tests, weighing public benefits against any harm to the significance of an asset.	comprehensive suite of designated and non-designated heritage assets, identified through previous Local Plans and the recent Local Listing Project. The focus of the new Local Plan should be on the positive management and enhancement of these existing assets, not on creating further layers of designation which risk devaluing the concept and creating unnecessary constraints on development.	of heritage assets is the contribution that they can make to understanding and interpreting our past. The current Local Plan polices recognise that decisions regarding heritage assets must be balanced; the council intends to carry this forward to the new Local Plan.
Woodland Trust	n/a	The Woodland Trust believes that the new Local Plan should take a broad and inclusive approach to the protection of heritage assets, recognising that heritage	n/a	There are a number of natural environment assets that are locally listed. The council recognises that

Respondent name	(31) Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?	(32) What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?	(33) Should the Council consider designating additional non-designated assets in the Borough?	Council Response
		encompasses both the built and natural environment. In particular, natural heritage assets such as veteran and ancient trees, ancient woodlands, and long-established hedgerows should be explicitly included within this definition. These natural features are living links to the past, often predating surrounding settlements and contributing significantly to the area's cultural identity, landscape character, and sense of place. The Local Plan should therefore ensure that such features receive appropriate protection, management, and recognition alongside designated and non-designated built heritage assets, reflecting their irreplaceable ecological and historical value.		natural features are living links to the past, often predating surrounding settlements and contributing significantly to the area's cultural identity, landscape character, and sense of place.

Respondent name	(34) Should town centre boundaries be extended to meet additional need for convenience retail provision?	(35) Where should any additional convenience retail premises be provided?	(36) Should policies set out specific requirements on the application of the sequential test for identifying sites for town centre uses?	(37) Should smaller neighbourhood centres be identified?	Council Response
Bryning with Warton Parish Council	Yes	In the centre and on the periphery of villages	Yes	Yes	Comments noted, the existing town centre boundaries have not changed from the previous Local Plan. The Council has taken its approach to convenience retail provision in line with the evidence base, the Fylde Healthcheck and Centres Study (2022) and supports new convenience retail provision in sustainable locations in St Annes and Warton. The Local Plan has been prepared under and is policy compliant with the NPPF with regards to the application of the sequential test. Neighbourhood centres have been designated to meet an identified retail need at the local catchment level.

Respondent name	(34) Should town centre boundaries be extended to meet additional need for convenience retail provision?	(35) Where should any additional convenience retail premises be provided?	(36) Should policies set out specific requirements on the application of the sequential test for identifying sites for town centre uses?	(37) Should smaller neighbourhood centres be identified?	Council Response
Christine Abbott	Not at the expense of countryside/green fields.	Disused buildings.	n/a	n/a	Settlement boundaries define the extent of each settlement. Land outside of the settlement hierarchy is protected by a hierarchy of designations, with the green belt providing the greatest protection, followed by areas of separation and lastly the countryside. Development in the countryside area, is only permitted under limited circumstances. This includes development for rural businesses and services, agriculture and small groups of dwellings. The policy provides significant protection for the countryside, supporting development that repurposes existing buildings and builds on previously developed land.

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					This provides sufficient protection for countryside areas to prevent uncontrolled development.
David Chedd	No	Town centres	n/a	n/a	Comment acknowledged. Retail uses are encouraged within the borough's three town centres under policy ECD7. Within the town centres retail is further directed to the primary shopping areas that encourage the retention of main town centre uses, including retail. The extent of the town centres and primary shopping areas are defined on the policies map. The Council has taken its approach to convenience retail provision in line with the evidence base, the Fylde Healthcheck and Centres Study (2022).

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Ethan Ellison	Yes, town centres can be congested so important to recognise the changing consumer behaviours and need for convenient services which often not in the town centre.	n/a	n/a	Yes, in some villages to diversify uses and allow limited and sustainable growth throughout the borough.	Comments noted. The Council has taken its approach to convenience retail in line with the evidence base whereby the Fylde Healthcheck and Centres Study (2022) identifies capacity for additional convenience retail in St Annes and Warton. Convenience retail provision is supported in sustainable locations in St Anne's and Warton. Neighbourhood centres have been designated for serving an identified retail demand at a local catchment beyond the town centres. Their proximity to local residential areas encourages sustainable development by meeting retail needs that would otherwise need to be

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					completed by car. Their designation encourages active travel and a reduction in private vehicle use, being essential in Fylde's smaller villages where service provision is naturally more limited.
Gerard Malone	Yes	Yes	Yez	No	Comments noted, the existing town centre boundaries have not changed from the previous Local Plan. The Council has taken its approach to convenience retail provision in line with the evidence base, the Fylde Healthcheck and Centres Study (2022) and supports new convenience retail provision in sustainable locations in St Annes and Warton. The Local Plan has been prepared under and is policy compliant with the

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					NPPF with regards to the application of the sequential test. Neighbourhood centres have been designated to meet an identified retail need at the local catchment level.
Hannah Dell'Armi	no	whitehills or out to preston perhaps where there are better road links and traffic calming, towards lea and the new moterway junction	n/a	yes	Comments noted, the existing town centre boundaries have not changed from the previous Local Plan. The local plan supports additional convenience retail provision in sustainable locations in St Annes and Warton in line with the evidence base (Fylde Healthcheck and Centres Study 2022). Whitehills is detailed as a strategic location in policy SLD2 where a new local centre is currently being developed.

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					Neighbourhood centres have been designated to meet an identified retail need at the local catchment level. Such designations will protect existing services and facilities and their proximity to residential areas promotes sustainability by reducing the need for private vehicle use.
Irene Jacques	No	There are enough convenience stores.	n/a	I don't think that's needed. Residents are happy to be identified as a Lytham St Annes resident.	Comment acknowledged, the designations in the local plan identify areas where retail and service provision should be protected and encouraged. It is down to market forces to deliver new provision. This is seen with the neighbourhood centres, which have been designated to protect service provision for local

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					residential catchments outside of the town centres. The local plan doesn't deliver new provision but identifies those areas in which new provision is encouraged and is most sustainably located.
John Maskell	No	n/a	n/a	n/a	Comment noted, the three town centre boundaries have not been changed from the previous Local Plan.
Keith McKay	n/a	Depends on the local circumstances - often low quality development involved in such use.	Yes	n/a	Comment is vague. The Council has taken its approach to convenience retail in line with the evidence base whereby the Fylde Healthcheck and Centres Study (2022) identifies capacity for additional convenience

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					retail in St Annes and Warton.
Linda Nulty	?	n/a	Yes	Definitely	Comments noted, neighbourhood centres have been designated to meet an identified retail need at the local catchment level. Such designations will protect existing services and facilities and their proximity to residential areas promotes sustainability by reducing the need for private vehicle use. The Local Plan has been prepared under and is policy compliant with the NPPF with regards to the application of the sequential test
Lytham St Annes Civic Society	No	In current local centres.	n/a	Yes, e.g. Whalley Place	Comments noted, the existing town centre boundaries have not

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					changed from the previous Local Plan. Smaller neighbourhood centres have been designated in the new Local Plan to 2042 to protect and encourage local service provision that meets the needs of local residential catchments. Whalley Place is one of the neighbourhood centres identified in the new Local Plan to 2042. Additional convenience retail will be permitted on the basis of the town centres first approach, where any proposals for additional convenience retail will be subject to the sequential test.
Marcus Dowling	Unsure	n/a	n/a	Yes	Comments noted, neighbourhood centres have been designated to

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					meet an identified retail need at the local catchment level. Such designations will protect existing services and facilities and their proximity to residential areas promotes sustainability by reducing the need for private vehicle use.
Stephen and Jacqueline Croft	Given housing extends generally on the edge then having retail within walking distance seems reasonable ... and who defines what is teh Town Centre? For me the Town Centre in Lytham stops at what used to be Taverner's but is perfectly reasonable to have cafe's and other shops further along that road, for example.	case by case	If i understood the question I may have a view	Yes	The Local Plan defines town centres in policy ECD7: Town, District, Local and Neighbourhood Centres which are shown on the policies map. The extent of the town centres has not changed since the previous Local Plan. Any main town centre uses including retail will be subject to the sequential test as part of the town centres first approach.

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					Comments noted, to address trading surpluses, from the recommendations of the Fylde Healthcheck and Centres Study (2022) additional convenience retail is supported in St Annes and Warton, subject to satisfying the sequential and impact tests. Neighbourhood centres have been designated to meet an identified retail need at the local catchment level. Such designations will protect existing services and facilities and their proximity to residential areas promotes sustainability by reducing the need for private vehicle use.
Steven Abbott	n/a	Class E areas where they are in or on the edge of the strategic locations.	The policy should reiterate Section 7 of the NPPF.	Yes	This comment is vague on where convenience retail premises ought to be

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					located. The Council has taken its approach in line with the evidence base whereby the Fylde Healthcheck and Centres Study (2022) identifies capacity for additional convenience retail in St Annes and Warton. Proposals in sustainable locations in these settlements will be supported subject to satisfying the sequential and retail impact assessments. Local Plan Policy ECD7: Town, District, Local and Neighbourhood Centres has been positively prepared in line with the requirements of the NPPF Section 7. Although proposals within use class E do not require planning permission Neighbourhood centres

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					have been designated to meet an identified retail need at the local catchment level. Such designations will protect existing services and facilities and their proximity to residential areas promotes sustainability by reducing the need for private vehicle use.
Blackpool Council	n/a	Whitehills - The document highlights the lack of facilities that have come forward from the Whitehills development and how this leads to car dependence. Continuing to improve facilities for walking, cycling and public transport in the area are key as the development continues to expand.	Whitehills - The document highlights the lack of facilities that have come forward from the Whitehills development and how this leads to car dependence. Continuing to improve facilities for walking, cycling and public transport in the area are key as the development continues to expand.	n/a	Whitehills is detailed as one of four strategic locations in the Local Plan. The Local Plan acknowledges the need for new facilities and local service provision at Whitehills, and that pedestrian movement across the area requires improvement. Policy SLD2 sets out site allocations and the considerations needed to address constraints

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					across the Whitehills strategic location. A new local centre is currently being developed to provide facilities for residential dwellings at the Whitehills strategic location.
Environment Agency	n/a	n/a	We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable	n/a	Comments noted.

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			development objectives that mean steering the development to any alternative sites would be inappropriate.		
Historic England	No comment.	No comment.	No comment.	No comment.	Comments noted
National Highways	Q34. The town centre-first development may influence traffic patterns and the demand for parking and access infrastructure. Whilst National Highways are supportive of development within existing sustainable locations dependent upon the type of retail offering being provided, it is recommended that the council consult National Highways on any proposed developments, particularly those near	Q35. Please see comment above.	Q36. WSP recommend 'no comment' to this question.	Q37. WSP recommends supporting smaller neighbourhood centres, based on the expectation that these would reduce the need to travel or reduce the distances needed to travel to access services and amenities for the resident population.	Fylde Council acknowledges and welcomes the supporting comments made. The town centres first approach is consistent with the framework and any development outside of town centres will be required to satisfy the sequential test for retain and the retail impact assessment. The neighbourhood centres have been designated to meet an identified retail need at the local catchment level. Such designations will

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	the SRN. It may be that these sites are subject to transport assessments. It also may be important to consider the cumulative transport impacts of the developments.				protect existing services and facilities and their proximity to residential areas promotes sustainability by reducing the need for private vehicle use.
PWA Planning	7.7. No. Extending town centre boundaries is unnecessary. Instead, the Plan's policies should be more flexible, acknowledging that a mix of uses outside of traditional centres can promote sustainable patterns of development and contribute to healthy communities, as recognised in our earlier comments on ancillary uses at employment parks.	7.8. The Plan must adopt a modern, forward-thinking approach that reflects changes in technology and lifestyles. A key opportunity is to support the co-location of convenience retail, food and drink, and other services at strategic transport and EV charging hubs. The transition to electric vehicles, with longer 'refuelling' times, creates new commercial	7.9. No. The sequential test is adequately defined and explained in the NPPF and national Planning Practice Guidance (PPG). A sound and succinct Local Plan should simply reference national policy on this matter, rather than creating a duplicate or potentially conflicting local interpretation.	n/a	Fylde's three town centre boundaries remain unchanged from the previous Local Plan to 2032 incorporating partial review. To encourage sustainability, neighbourhood centres have been designated to protect and encourage retail and other services providing for local residential catchments. It is acknowledged that the co-location of services can encourage sustainability by

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		opportunities at roadside locations. Supporting ancillary retail at these locations caters to Page 23 an existing need, captures passing trade, and can ultimately reduce the overall number of car trips, thereby supporting sustainability goals without undermining the primary role of town centres.			way of linked trips, however this is inconsistent with a town centres first approach. The sequential test and retail impact test continue to apply to any proposals for main town centre uses in out of centre locations. Regarding the sequential test, the policy has been prepared in compliance with the framework. Comments noted, the Local Plan is policy compliant with the NPPF with regards to the application of the sequential test.
S&L for River Properties	It is unlikely that St Annes town centre and Lytham town centre can be extended to accommodate modern format convenience (food store)	In the absence of being able to accommodate new convenience floorspace in a modern format food store/s within St Annes and Lytham town centres,	No - the new Local Plan should not include policies which set out specific requirements for the application of the sequential test for identifying sites for town	n/a	The town centre boundaries of St Annes and Lytham remain unchanged from the previous Local Plan to 2032 incorporating partial review. The Council's approach to convenience

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	provision due to the location and containment of the town centres within tightly surrounding residential areas, and the lack of any obvious expansion areas such as vacant and under-used land and large surface car parks which could be redeveloped.	the need should be met in the suburban area at Heyhouses within the Lytham and St Annes Strategic Location for Development where major housing growth has taken place and will continue to take place under the adopted Local Plan, and should continue to take place under the proposed new Local Plan to 2042. Retail provision at Heyhouses is currently limited to a 3,000 sqm Booths supermarket and land is available for new retail space on our client's site identified as Site H2 - Land West of North Houses Lane in the Preferred Options version of the Part 1 Fylde Local Plan to 2032 which was	centre uses. Sufficient national policy on the application of the sequential test is provided in the NPPF and the Planning Practice Guidance and this does not need to be replicated or added to in the new Local Plan.		retail provision follows the recommendations of evidence base (Fylde Healthcheck and Centres Study (2022)). New convenience retail is supported at sustainable locations in St Annes and Warton. Comments noted, the Local Plan is policy compliant with the NPPF with regards to the application of the sequential test.

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		published for consultation between June and August 2013 and which was submitted in the Call for Sites in June 2025. The potential of the land is set out in the answer to Question 8 of this consultation and in the pre-application enquiry (ENQ/23/0039) which explains that it has capacity to include a local centre including a food store/s up to 3,000 sqm, in line with the combined convenience retail capacity identified for St Annes and Lytham in the Fylde Health Check and Centres Study of September 2022, 5 300 sqm ancillary retail, food and drink outlet/s and/or drive-thru unit/s and, potentially, a 300 sqm			

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		primary care centre and 200 sqm children's nursery. Provision of new convenience retail and complementary facilities in a proposed Local Centre (to be designated in the new Local Plan) at Heyhouses will therefore provide more choice (quantitatively and qualitatively) for the existing and future residential community, and will improve its sustainability and accessibility to local facilities without incurring unnecessary car trips to other supermarkets and without having a significant adverse impact on the vitality and viability of St Annes and			

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		Lytham town centres. Lytham St Anne's is a target area for a number of national retailers which currently have no, or only limited, representation in the area and include mainstream, premium and discount operators with different store size and format requirements.			
Steven Abbott Associates for Bradkirk Business Park	n/a	Class E areas where they are in or on the edge of the strategic locations	The policy should reiterate Section 7 of the NPPF.	Yes	This comment is vague on where convenience retail premises ought to be located. The Council has taken its approach in line with the evidence base whereby the Fylde Healthcheck and Centres Study (2022) identifies capacity for additional convenience retail in St Annes and Warton. Proposals in sustainable locations in these

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					settlements will be supported subject to satisfying the sequential and retail impact assessments. Local Plan Policy ECD7: Town, District, Local and Neighbourhood Centres has been positively prepared in line with the requirements of the NPPF Section 7. Although proposals within use class E do not require planning permission to change between uses in that use class, Neighbourhood centres have been designated to meet an identified retail need at the local catchment level. Such designations will protect existing services and facilities and their proximity to residential areas promotes sustainability by reducing

Respondent name	(34) Should town centre boundaries be extended to meet additional need for convenience retail provision?	(35) Where should any additional convenience retail premises be provided?	(36) Should policies set out specific requirements on the application of the sequential test for identifying sites for town centre uses?	(37) Should smaller neighbourhood centres be identified?	Council Response
					the need for private vehicle use.

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
Anna Briggs	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
Bryning with Warton Parish Council	Yes	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted
Christine Abbott	Ashton Gardens, St.Annes. Lytham Hall. Freckleton memorial Gardens Witch Wood. Elswick Village Green Kirkham Town centre High Street	n/a	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	The area mentioned have been considered for Local Green Space designation but ultimately rejected
David Chedd	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
Emma Swindells	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted
Ethan Ellison	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted
Frank Andrews	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger	n/a	Comments noted

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
				sites, applied flexibly?		
Frank Andrews	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger sites, applied flexibly?	n/a	Comments noted
Gerard Malone	No	Retain protection of some open spaces but identify others as no longer needed?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger	n/a	Comments noted

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
				sites, applied flexibly?		
Hannah Dell'Armi	village boundaries need to be protected, Freckleton, Warton, Wrea Green and Kirkham run the risk of merging into one if we continue to build on the green belt between them	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger sites, applied flexibly?	n/a	There are policies in the Local Plan to protect Green Belt and Areas of Separation to prevent coalescence
Hilary Ayling	Wesham- the fields and ponds behind Park Lane, bounded by Mowbreck Lane, the railway line. The Hill is known locally as "Town Hill" and is remembered as the place where people went for	n/a	n/a	n/a	n/a	The land has evidential significance, it makes a contribution to the historic environment. Local Green Space is normally designed and

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	picnics in the past. Many people take the route along Park Lane/ Mowbreck Lane and through the fields back to Kirkham as a regular, popular local walk. The ponds historically were used by the townspeople for the "retting" (soaking) of flax, which was grown around Kirkham, so they are part of the town's textile heritage (EG It is recorded that, in 1611 a fine was to be charged for any local who soaked their flax in the					semi natural spaces and not open countryside such as this. The council does not intend to consider the land for Local Green Space

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	ponds without permission). There are also records of the pond being used for the punishment of criminals, by the use of dunking stools. So the fields are part of the towns heritage as well as currently being a useful free exercise area.					
Irene Jacques	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted
John Leadbeater	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types	n/a	Comments noted

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
				of open space including more natural green space?		
John Maskell	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger sites, applied flexibly?	n/a	Comments noted
Keith McKay	Possibly - Memorial Gardens / Cenotaphs	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted. Local Green Space is normally multi-functional spaces and not small memorial gardens The council does not intend to consider

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
						memorial gardens for Local Green Space
Linda Nulty	Fleetwood Road playing fields Wesham and Doorstep Green Wesham. Open Spaces on some new developments	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger sites, applied flexibly?	n/a	Comments noted. Local Green Space is normally multi-functional spaces and not recreational fields and village greens. The council does not intend to consider these open spaces for Local Green Space designation
Linda Nulty	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	n/a	n/a	Comment noted

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
Lytham St Annes Civic Society	We agree with the proposed designation of Local Green Space. Open areas of the beach and foreshore should be included in this category. They are not development sites. These areas are under permanent threat of being used as car parks for commercial events, particularly Lytham Green and an area of flattened sand dunes on Inner Promenade. The recent proposal to place a licensed restaurant on previously	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted. Local Green Space is normally multi-functional spaces and not coastline spaces. The council does not intend to consider these open spaces for Local Green Space designation The Council is aware of that there is a concern in the local community about overuse of the Green and occasional & regular use for private events and considers issues

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
	undeveloped Granny's Bay caused great local consternation. In areas such as Lytham Green, there should be a restriction on the number of days the area is closed to public access. All current open spaces should be considered individually for LGS designation. Green spaces in urban areas should also be protected for their importance in reducing the flood risk to surrounding developments.					through the licensing function. The council recognises that green space protection has a role in reducing flood risk

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
Marcus Dowling	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger sites, applied flexibly?	n/a	Comments noted
Martin Alderman	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger sites, applied flexibly?	n/a	Comments noted

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
P Stanford	Lytham Green Kirkham needs one – Kirkham Station Road Woods Kirkham St George Park Wood – Wrongway Brook Kirkham St George Park Wood – Bentley Drive / Regency Kirkham Cricket Club Wesham Derby Road Wesham Fleetwood road playing fields etc	n/a	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted. Local Green Space is normally multi-functional spaces and not amenity green spaces. The council does not intend to consider these open spaces for Local Green Space designation
Philip Bickerstaff	n/a	Retain protection of some open spaces but identify others as no longer needed?	n/a	n/a	n/a	Comment noted

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
Stephen and Jacqueline Croft	I don't think the Plan mentions/clearly defines Local Green Spaces so it needs greater emphasis. Places like Witch Wood in Lytham and The Green in Wrea Green are examples of special places to be preserved.	Retain protection of some open spaces but identify others as no longer needed?	n/a	Revise the policy to allow provision of a wider range of types of open space including more natural green space?	n/a	Comments noted Local Green Space is normally multi-functional spaces and not woodland parks. The council does not intend to consider this natural open space for Local Green Space designation
Susan Lee	n/a	Retain protection of existing identified open spaces through Local Plan policy?	n/a	Continue with the policy requiring the provision of amenity open space including children's play space within new development sites, doubled for larger	n/a	Comments noted.

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
				sites, applied flexibly?		
Environment Agency	n/a	Natural green space is highly beneficial for people's health and wellbeing, and has wider benefits such as promoting biodiversity and providing natural flood risk management. Often, site layouts are focused on maximising the area of land for housing / employment use with little or no land reserved for nature, watercourses or open space. And where natural green spaces are provided, they tend not to be connected to other similar spaces on or off-site. We encourage the provision of a site design policy that incorporates multiple benefits, retains open space and priority habitats and retains ecological corridors within an overall development design.	n/a	Natural green space is highly beneficial for people's health and wellbeing, and has wider benefits such as promoting biodiversity and providing natural flood risk management. Often, site layouts are focused on maximising the area of land for housing / employment use with little or no land reserved for nature, watercourses or open space. And where natural green	n/a	The council intends to include a policy that is responsive to the needs of the site and the local area which will allow greater variety of open space including areas that provide habitat creation

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
				spaces are provided, they tend not to be connected to other similar spaces on or off-site. We encourage the provision of a site design policy that incorporates multiple benefits, retains open space and priority habitats and retains ecological corridors within an overall development design.		
DLP Planning for BAE Systems	n/a	BAE Systems supports option c) and considers that the owners of open space and sports facilities should be best placed to decide the future of those sites. This would provide increased flexibility for the redevelopment of facilities that are surplus	n/a	n/a	n/a	The council intends to include policy that balances the benefit of any development

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		to requirements or there are other factors that may support the redevelopment of such facilities. In relation to the latter, the Council should, when considering development proposals that would result in the loss of open space and sports facilities, balance the benefit of any development proposals against the loss of the facility. If a blanket restriction is placed on the development of open space and sports facilities such a balancing exercise would not be possible.				proposals against the loss of open space
Historic England	No comment.	No comment.		No comment.		Noted
Lichfields for Taylor Wimpey	n/a	n/a	n/a	Public Open Space Taylor Wimpey considers that there must be a quantitative policy expectation clearly defining required public open space	n/a	The council intends to include policy that quantifies public open space provision as part of residential developments

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				provision as part of residential developments. Developments that can accommodate high quality POS should in turn be considered favourably, particularly when considering future residential allocations.		
National Highways	Q38. No comment.	Q39. WSP would suggest that option (a) is supported, as retaining the protection of the existing open spaces through the LP policy will ensure consistency with national guidance.	n/a	Q40. Same as above.	n/a	Comments noted
PWA Planning	7.10. The tool of Local Green Space designation should be used sparingly	n/a	n/a	7.11. The new Local Plan should revise the existing policy to allow for a wider	n/a	Comments noted. The council intends for designation not to

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	and only in response to specific, evidence-led community proposals for genuinely special parcels of land. It should not be used as a blanket designation to frustrate the strategic growth objectives of the Local Plan.			range of open space typologies, including more natural green space. This is a critical amendment for two key reasons: 1. Flexibility and Place-Making: A flexible policy allows for the creation of bespoke open space that better responds to the specific context of a site and the needs of the local community, rather than a rigid 'one-size-fits-all' approach. 2. Delivering		be used as a blanket designation to frustrate the strategic growth objectives of the Local Plan. The council intends to include a policy that is responsive to the needs of the site and the local area which will allow greater variety of open space including areas that provide habitat creation

Respondent name	(38) Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.	(39) Should the new Local Plan:	Please specify	(40) Should the new Local Plan:	Please specify and explain	Council Response
				Biodiversity Net Gain (BNG): The mandatory 10% BNG requirement is a major consideration for all new development. A prescriptive policy focused solely on formal play areas can conflict with the need to deliver meaningful habitat creation and achieve BNG, particularly on constrained sites. Allowing natural green space and habitat creation areas to count towards open space provision provides the flexibility needed		

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				to deliver high-quality schemes that meet both recreational and biodiversity objectives, while still achieving appropriate housing densities.		
Sport England	n/a	As set out in paragraph 6.23 of the consultation document, the restrictive approach to development on open space would need to remain to ensure that the Local Plan policies are compliant with the NPPF especially paragraph 104. Furthermore, as set out in paragraph 6.25 of the consultation document, new open space should be provided to support development, either on-site or through off-site contributions. However, to ensure that Local Plan policies that support the protection of open space (including sports facilities) and	n/a	n/a	n/a	Comments noted. The Council intends to protect existing sports provision in the Local Plan, and include policy that allows scrutiny of planning applications proposing removal of sports land to the effect that the

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		seek new provision through development can be justified, planning policies should be based on robust and up-to-date assessments of need as set out in paragraph 103 of the NPPF. The information gained from such assessments should be used to determine what open space, sport and recreation provision the Local Plan should seek to accommodate. In relation to outdoor sports facilities, the most recent Fylde Playing Pitch Strategy provides the evidence base for playing pitch provision but was completed in 2016 so is now almost 10 years old. There would not appear to be an evidence base covering needs for other outdoor sports facilities or indoor sports facilities. There is therefore a concern that decisions about planning for meeting the current and future sports facility needs of the community in Fylde over the period to 2042 will not be based on an up-to-date, and therefore robust, evidence				developer provides robust evidence that the land is not needed. Where the Council has demonstrated need for sports facilities the plan will require development sites that contribute to the need to pay commuted sums for off-site provision.

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		base in accordance with the requirements of paragraph 103 of the NPPF. A clear understanding of current and future community sports facility needs is essential for informing and justifying updated local plan policies which cover the protection, enhancement and provision of sports facilities and open space more broadly. For example, how would the Council or an applicant be able to clearly demonstrate that a sports facility is surplus to requirements if there is no up-to-date objective assessment of needs available to assess a development proposal or potential site allocation against. Sport England's advice is that assessments of sports facility needs should be prepared at least every five years. The reasons that assessments of need should be based on up-to-date data are, in summary, as follows: • The supply of facilities changes significantly over time. As well as new				

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		facilities opening and existing ones closing, access to facilities can change (e.g. on school sites), the quality of facilities changes over time as facilities become older (which influences the ability of facilities to meet the needs and expectations of the community) and the format and operation of facilities can change. • The demand for facilities changes significantly over time. Demand for sports facilities is affected by a number of factors including population growth, sports participation changes (both general and sport specific), local sports club infrastructure and local sports development initiatives. The nature of the demand will also change over time (e.g. growth in participation by children, women and disabled groups) and the type of facilities required in response to changes in demand will have implications. For example, the 2016 Playing Pitch Strategy will not have accounted for the significant recent growth				

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		in demand nationally and locally for 3G artificial grass pitches and padel courts. The 2016 Playing Pitch Strategy will also not have accounted for current projections of future population and sports participation growth in Fylde which will have changed. Furthermore, the lack of recent consultation with stakeholders such as sports clubs, sports governing bodies, schools, parish councils etc on supply and demand issues may result in current and future needs not being identified. Since the 2016 strategy was prepared, it is also advised that the tools and guidance available for collecting data and undertaking assessments with respect to sports facilities has changed and Sport England has published a range of more recent guidance to help local authorities such as the Assessing Needs and Opportunities guidance and the Planning for Sport guidance https://www.sportengland.org/guidance-				

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		and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance. If the current evidence base is not updated and continues to be used for determining planning applications or informing Local Plan site allocations for development, developers are likely to challenge the evidence base especially in the context of the need to protect existing facilities or provide for community sport in new development through planning obligations or CIL. In view of this, if the Local Plan is progressed to examination without being supported by an up-to-date assessment of needs covering both outdoor and indoor sports facilities it would not be considered to accord with the 'positively prepared', 'justified' or 'consistent with national policy' tests of soundness. To address the above concerns, it is requested that in accordance with paragraph				

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		103 of the NPPF, the Council prepares a new assessment of needs for indoor and outdoor community sports provision. The Council may also need to consider whether the evidence base for other open space typologies also needs to be updated although it is not within Sport England's remit to comment on this. Detailed advice on the preparation of indoor and outdoor sports facility strategies can be found on Sport England's website https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/assessing-needs-and-playing-pitch and further advice can be provided upon request.				
Woodland Trust	n/a	We support Option a). These spaces form an essential part of Fylde's Green Infrastructure network, providing vital benefits for biodiversity, climate resilience, and community wellbeing. Open spaces often contain important natural	n/a	We support Option b). Incorporating natural green spaces within new developments	n/a	The council agrees that open spaces form an essential part of Fylde's Green

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		features such as trees, woodland, and wildlife habitats, which contribute to local character and environmental quality. Removing or weakening their protection could lead to the gradual erosion of these assets. The Local Plan should therefore maintain and, where possible, strengthen policy protection for all existing open spaces to ensure they continue to deliver ecological, recreational, and landscape benefits.		provides multiple benefits beyond amenity and play, including enhancing biodiversity, supporting wildlife corridors, improving air quality, and contributing to climate resilience. Flexible, well-designed natural green spaces also improve residents' access to nature, promote physical and mental wellbeing, and strengthen connections with the wider ecological network. We encourage the		Infrastructure network, providing vital benefits for biodiversity, climate resilience, and community wellbeing. The council intends the Local Plan shall encourage native planting, tree and woodland creation, and habitat connectivity

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				Local Plan to ensure that new open spaces prioritise native planting, tree and woodland creation, and habitat connectivity, so that developments deliver both recreational and environmental value for the long term.		

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
Alban Cassidy	No for the reasons given earlier. The green belt in Fylde is largely something of an anomaly, given how small and narrow it is in a number of locations	As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	and there are many areas where it does not serve genuine green belt purposes. One such example are sites to the south of Kirkham and elsewhere where the site has existing development on three sides and its development would not breach any of the key purposes of green belt. Some of these areas could be argued to be grey belt and may even be suitable for development in the short term.	review of the Green Belt in Fylde. Please refer to Strategic Policy DST3 Green Belt for further information.
Anna Briggs	The green belt should be expanded.	Comments noted. In Fylde, the areas covered by Green Belt represent only a small proportion of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. Please refer to Strategic Policy DST3: Green Belt for further information.
Bryning with Warton Parish Council	Yes	Comment noted.
Christine Abbott	Yes, Green Belt land requires no review. It is integral to the Fylde characteristics and takes up only very small areas. If anything, it should be extended to protect and preserve open areas.	Comments noted. Please refer to Strategic Policy DST3: Green Belt for further information.
Claire Parker for Blackpool Council	It is clear that there is a need for employment provision within the borough. As such a review should be taken of areas of green belt on the periphery of settlements. In many cases these areas could now be deemed grey belt and often are bound by existing development on three sides.	As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3 Green Belt for further information.
David Chedd	Yes	Comment noted.

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
Ethan Ellison	Yes, Fylde currently has limited Green Belt, thus other sites are available for development.	Comments noted. Please refer to Strategic Policy DST3: Green Belt for further information.
Frank Andrews	its difficult to follow the reasoning on why land is designated as Green Belt. Why does Frecklton get so much of it?	The Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration by encouraging the recycling of derelict and other urban land. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. Please refer to Strategic Policy DST3: Green Belt for further information.
Irene Jacques	Green Belt land is sacred.	Comments noted. Please refer to Strategic Policy DST3: Green Belt for further information.
John Leadbeater	Yes. See previous comments.	Comments noted. Please refer to Strategic Policy DST3: Green Belt for further information.
John Maskell	Yes	Comments noted. Please refer to Strategic Policy DST3: Green Belt for further information.

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
Keith McKay	Yes	Comments noted. Please refer to Strategic Policy DST3: Green Belt for further information.
Linda Nulty	NO Green belt areas not always now of any significance e.g. around Freckleton	The Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. Please refer to Strategic Policy DST3: Green Belt for further information.
Lytham St Annes Civic Society	No, we believe that the coastal areas should be included as Green Belt.	In Fylde, the areas covered by Green Belt represent only a small proportion of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde.

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
		Please refer to Strategic Policy DST3: Green Belt for further information.
Marcus Dowling	Yes	Comment noted. Please refer to Strategic Policy DST3: Green Belt for further information.
P Stanford	No – Green belt should include ALL land to the north of the A585 Kirkham bypass (FBC have failed to protect this to date ! so now the time ...) Natural break between community and countryside.	National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3 Green Belt for further information.
Philip Bickerstaff	No, I don't support the councils proposal to not review Green Belt. Over the years Green belt boundaries have changed on the boundaries, as various small tracts of land have been released. This has resulted in very jagged boundaries and the purpose of Green Belt is prevent Urban sprawl, stop towns merging,safeguard the countryside. In Warton, the green belt is not in danger of creating urban sprawl as the boundaries are not even on either side of the main A584. Warton is not near Lytham, so there is no chance of it merging if the green belt was tidied up.	The Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Please refer to Strategic Policy DST3: Green Belt for further information. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	Safeguarding the countryside is not an issue as just re aligning the boundaries, especially those that are next to the development zone in Warton, will still safeguard the countryside .	review of the Green Belt in Fylde. Please refer to Strategic Policy DST3 Green Belt for further information.
Stephen and Jacqueline Croft	No - it is always appropriate to have an on going discussion ... that may include extending what we have ...	National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3 Green Belt for further information.
DLP Planning for BAE Systems	BAE Systems does not support the Council's position that there should be no Green Belt review as part of the creation of the emerging Local Plan. Whilst it is acknowledged that it is the Council's position that overall / general housing and employment needs may not provide exceptional circumstances for amending the Green Belt boundary (and BAE Systems are not commenting on the general need for housing or employment development in these representations), BAE Systems does consider that there are specific circumstances at Warton Aerodrome that would provide exceptional circumstances for localised Green Belt	As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The change is shown in Appendix 4.

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	amendments at Warton Aerodrome. Those circumstances are: 1. Given the importance of Warton Aerodrome to national defence and its local and regional importance for employment and economic development, there is a need to continue to support the growth of the Aerodrome to enable BAE Systems to respond quickly to changes in technology or demand for the advanced engineering and testing facilities at the Aerodrome, which may require additional development. 2. There is a location need for development at the Aerodrome in relation to any new development being functionally linked to existing facilities / operations at the Aerodrome and to ensure the Fylde continues to benefit from the employment and economic activity at the site. As referred to in response to Question 23 above, there is a finite land resource within the existing boundary of the Aerodrome due to constraints related to the operational runway, explosive licences, and other technical aspects of the aviation operations at the Aerodrome. The use of additional land adjacent to the Aerodrome would provide greater flexibility in the type of facilities that could be developed at the Aerodrome and may allow for a more optimal layout of development to be achieved. Whilst the removal of land to the west of Warton Aerodrome from the Green Belt could provide opportunities for speculative development on this land not linked to Warton Aerodrome, it is considered that this could be avoided by allocating this area as land for the expansion of Warton Aerodrome. These	

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	exceptional circumstances are clearly tied to future development needs and the importance of Warton Aerodrome and would not therefore present a case or support for wider Green Belt boundary changes elsewhere in Fylde. BAE Systems would welcome a meeting with the Council to discuss these exceptional circumstances in more detail. In addition, it is considered that the Green Belt immediately to the west of Warton Aerodrome does not perform strongly against any of the roles of the Green Belt set out in the National Planning Policy Framework, and therefore the removal of that land from the Green Belt would not impact on the objectives of the wider Green Belt to the east in relation to maintaining an open gap between Warton and Lytham St Annes. The table below set out how the Green Belt immediately to the west of Warton Aerodrome performs poorly against the purposes of the Green Belt. Role of Green Belt a) to check the unrestricted sprawl of large built-up areas Contribution to that Role - The Green Belt to the immediate west of the Aerodrome performs no function in checking the sprawl of development from Warton in a westerly direction as there is already existing development at Warton Bank, along Bank Lane, that encroaches into the Green Belt. The infilling of the gap between the western boundary of Warton Aerodrome and the development along Bank Lane	

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	would not result in the built up area of Warton encroaching further into the Green Belt than the existing development. Role of Green Belt b) to prevent neighbouring towns from merging Contribution to that Role - Similar to above, removal of the land between the western edge of Warton Aerodrome and the existing development along Banks Lane would not result in the urban area of Warton encroaching any closer to Lytham St Annes than it currently does, as a result of the existing development to the west of Banks Lane. The gap between Lytham St Annes and the existing built development would remain the same. Role of Green Belt c) to assist in safeguarding the countryside from encroachment Contribution to that Role - The removal of the land immediately to the west of Warton Aerodrome from the Green Belt and its development would not result in the built up area encroaching any further into the Green Belt than existing due to the existing built development to the west of Banks Lane. Role of Green Belt d) to preserve the setting and special character of historic towns Contribution to that Role - Warton is not a historical town. The Green Belt immediately to the west of Warton Aerodrome does not therefore perform this function.	

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	Role of Green Belt e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land Contribution to that Role - Given that there is limited scope for further development within the existing Aerodrome site, there is a need to expand the site which will require the use of greenfield land. There would be limited harm therefore to objectives for the re-use of previously developed land by removing the land to the immediate west of Warton Aerodrome from the Green Belt. In light of the above, it is considered that the removal of the land between the western boundary of the Aerodrome and Banks Lane would not result in harm to the strategic role of the Green Belt between Warton and Lytham St Annes. A significant open gap would remain between the two settlements and the remainder of the Green Belt would still fulfil the roles of the Green Belt in the National Planning Policy Framework. It is considered that Banks Lane and the western edge of the development along Banks Lane would be a more appropriate and defensible boundary to the Green Belt.	
Gladman	4.6.3 Gladman supports the Council's initial decision not to review the Green Belt through the new Local Plan. Gladman notes that only around 11% of the borough is designated as Green Belt, meaning that there should be sufficient land available outside of this designation that can come forward for residential development over the emerging local plan period to meet housing needs in full. There are a number of	Comments noted

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	sustainable settlements that lie outside of the Green Belt or are only partially constrained by the designation that are capable of accommodating further housing growth over the emerging plan period, such as Warton. 4.6.4 If the Council's approach changes and Green Belt release is proposed or identified as being necessary to meet the borough's housing needs, Gladman reserves the right to comment further as the emerging Local Plan progresses.	
Historic England	No comment.	Noted
Home Builders Federation	Policy Issues: Protected Environments and Assets 26. The HBF considers that there is merit in undertaking a review of the Green Belt. Whilst it is noted that the consultation document states in paragraph 6.30 that in Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land, those areas covered by Green Belt do surround some of the Borough's larger settlements (Lytham St Annes, Walton/Freckleton, Kirkham/Wesham). There is also Green Belt which forms the urban edge of neighbouring Blackpool. 27. It is therefore likely that any future spatial strategy for the Borough is going to include growth in these areas (given their likely places in a future settlement hierarchy) and therefore to meet the needs in these settlements, a review of the Green Belt should be undertaken.	In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3 Green Belt for further information.

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
National Highways	Q41. WSP suggest that National Highways responds 'neutral' to this question as it is noted that existing areas of Green Belt are not located near to the SRN.	Comments noted.
PWA Planning for Medicom	We recognise and support the need to protect the borough's most valuable environmental and heritage assets. However, protectionist policies must be proportionate, evidence-based, and applied in a manner consistent with the NPPF. Protection must be about managing change, not preventing it. 7.2. The primary policy designation affecting the land at School Farm is the Green Belt. Our representations in this chapter will demonstrate that the Council's current stance of refusing to review the Green Belt is unsound, contrary to national policy, and overlooks the significant opportunity presented by sustainable, previously developed 'Grey Belt' sites like School Farm to meet the borough's housing needs. 7.3. No. We strongly and fundamentally object to the Council's proposal that the Green Belt should not be reviewed. This position is not only premature but is also inconsistent with the overarching objective of the planning system: to deliver sustainable development. By refusing to assess all potential land supply options, the Council risks promoting a less sustainable pattern of development and	The Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration by encouraging the recycling of derelict and other urban land. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information.

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	will render the emerging Local Plan unsound. 7.4. Our objection is founded on the core planning principle that not all Green Belt land is of equal value or importance. A refusal to review the Green Belt fails to recognise the sophisticated, evidence-led approach now mandated by the NPPF and its supporting PPG. 1. The Overriding Objective is Sustainable DevelopmentThe primary objective of the Local Plan is to deliver sustainable development. Paragraph 110 of the NPPF requires the planning system to actively manage patterns of growth to support sustainable transport, stating that "Significant development should be focused on locations which are or can be made sustainable". The School Farm site is immediately adjacent to the settlement of Warton, a major employment hub with local services. It is an inherently sustainable location for new housing, allowing residents to access jobs and facilities by walking and cycling. By ruling out a review of the Green Belt, the Council risks forcing development into less sustainable, more remote locations, leading to increased car dependency—a pattern of development that directly undermines the Plan's ability to be effective. 2. The "Exceptional Circumstances" Test is Unquestionably Met The NPPF requires "exceptional circumstances" to justify a Green Belt review (paragraph 145). The Council's high housing need (a 34% uplift to 410 dpa) is a clear exceptional circumstance in itself. However, the need to	

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	deliver this growth in the most sustainable pattern possible adds significant weight to this justification. Where a Plan cannot deliver its required growth in sustainable locations without considering Green Belt land, the exceptional circumstances to justify a review are unquestionably met. 3. The Council is Failing to Apply the Government's Differentiated Approach to Green Belt Land The central flaw in the Council's position is its failure to acknowledge that national policy requires a granular assessment of Green Belt land. The NPPF (December 2024) and PPG (February 2025) mandate a move away from blanket protection towards an evidence-led approach that assesses the specific contribution of individual land parcels. The School Farm site is a prime example of land that would be identified as "Grey Belt" through a proper assessment. • It is Previously Developed: The site contains a range of farm buildings and, crucially, substantial areas of hardstanding and tarmac from its former use as a WW2 military taxiway. • It Makes a Weak Contribution to Green Belt Purposes: Being contained by the existing edge of Warton, its development would not constitute "unrestricted sprawl" (Purpose A) or lead to the merging of towns (Purpose B). • The PPG Mandates a "Grey Belt" Assessment: The PPG is explicit: "we expect authorities to identify grey belt land to inform this	

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	review and the prioritisation detailed in paragraphs 147 and 148 of the NPPF". By refusing to conduct a review, the Council is failing to follow the clear procedural guidance for identifying the least sensitive parcels of Green Belt land. Conclusion on Green Belt 7.5. The Council's position is untenable. A full, strategic review of the Green Belt is an absolute necessity to produce a sound and sustainable Local Plan. This review, undertaken in line with the PPG's methodology, is the only way to ensure that development is steered to the most appropriate locations. It will inevitably identify School Farm as a sustainable, deliverable 'Grey Belt' site that represents a logical and priority choice for allocation.	
PWA Planning for Ribby Hall	4.1. No. We strongly and fundamentally object to the Council's proposal that the Green Belt should not be reviewed. This position is not only premature but is also inconsistent with the overarching objective of the planning system: to deliver sustainable development. By refusing to assess all potential land supply options, the Council risks promoting a less sustainable pattern of development and will render the emerging Local Plan unsound.	National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information.

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
PWA Planning	7.12. No. We strongly and fundamentally object to the Council's proposal that the Green Belt should not be reviewed. This position is not only premature but is also inconsistent with the overarching objective of the planning system: to deliver sustainable development. By refusing to assess all potential land supply options, the Council risks promoting a less sustainable pattern of development and will render the emerging Local Plan unsound. 7.13. Our objection is founded on the core planning principle that not all Green Belt land is of equal value or importance. A refusal to review the Green Belt fails to recognise the sophisticated, evidence-led approach now mandated by the NPPF and its supporting PPG. 1. The Overriding Objective is Sustainable Development 7.14. The primary objective of the Local Plan is not simply to restrict development, but to deliver sustainable development. Paragraph 110 of the NPPF requires the planning system to actively manage patterns of growth to support sustainable transport, stating that "Significant development should be focused on locations which are or can be made sustainable". Often, the most sustainable locations for new development, which can take advantage of existing services, infrastructure, and public transport, are those on the edge	National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. The Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration by encouraging the recycling of derelict and other urban land. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information.

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	of existing settlements—locations that in Fylde are frequently constrained by the Green Belt. 7.15. By ruling out a review of the Green Belt, the Council creates a fundamental strategic conflict. It risks forcing development into less sustainable, more remote locations, leading to increased car dependency and inefficient use of land, simply to avoid assessing land designated as Green Belt. This directly undermines the Plan's ability to deliver the most sustainable pattern of development. 2. The "Exceptional Circumstances" Test is Met by the Need for a Sustainable Strategy 7.16. The NPPF requires "exceptional circumstances" to justify a Green Belt review (paragraph 145). The Council's high housing need (a 34% uplift to 410 dpa) is a clear exceptional circumstance in itself. However, the need to deliver this growth in the most sustainable pattern possible adds significant weight to this justification. Where a Plan cannot deliver its required growth in sustainable locations without considering Green Belt land, the exceptional circumstances to justify a review are unquestionably met. 3. A Green Belt Review is a Procedural Expectation under the PPG 7.17. The PPG (updated February 2025) is clear that a Green Belt review is a core part of sound plan-making "where necessary". The need to find sustainable locations for a significantly increased housing target makes such a review necessary in Fylde. The PPG then sets out a clear	

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	expectation for how this should be done: • The Mandate for a "Grey Belt" Assessment: The PPG states: "we expect authorities to identify grey belt land to inform this review and the prioritisation detailed in paragraphs 147 and 148 of the NPPF". This is not an optional exercise; it is the government's expected methodology for sound plan-making. • A Clear Methodology for Identifying Weaker Land: The PPG provides a detailed methodology for this Green Belt Assessment. It requires authorities to evaluate land parcels against Green Belt purposes. Crucially, Paragraph 007 of the PPG provides a clear threshold: "any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land". 7.18. By refusing to conduct a review, the Council is failing to follow the clear procedural guidance for identifying the least sensitive parcels of Green Belt land. This represents a clear failure to prepare the plan in a way that is consistent with national policy. The Council's approach treats a parcel of previously developed land on the edge of a settlement as having the same policy status as a pristine, open landscape that performs a vital separation function—an approach now directly contrary to the NPPF and PPG. Conclusion on Green Belt 7.19. The Council's position is untenable. A full, strategic review of the Green Belt is an absolute necessity to produce a sound and sustainable Local Plan. This review, undertaken in line with the PPG's methodology to identify "grey belt", is	

Respondent name	(41) Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.	Council Response
	the only way to ensure that development is steered to the most appropriate locations, thereby meeting the borough's needs while achieving a truly sustainable pattern of growth.	
S&L for J Edwards, J Marquis and A Marquis-Carr.	At this early stage of the plan-making process, ahead of the completion and publication of a SHELAA evidence base and Sustainability Appraisal, it cannot be concluded that the Green Belt should not be reviewed. The Council has stated that its preference, in reviewing the adopted Local Plan and extending the plan period to 2042, is to retain and build on the existing Development Strategy (Spatial Option 1) with updates to the four Strategic Locations for Development at St Annes, Whitehills and Whyndyke, Warton and Kirkham and Wesham where the majority of new growth should be focussed. It has also speculated that an alternative variation (Spatial Option 2) might be to locate some new growth on the Borough boundary, and noting that the new Local Plan may have to plan for an agreed amount of any unmet housing need arising from Blackpool which cannot be accommodated in Blackpool district. When considering Spatial Options 1 and 2, it is noted that three of the four tracts of Green Belt in Fylde are associated with, and located around, three of the four main urban areas and Strategic Locations for Development (excluding Whitehills and Whyndyke) preferred to be carried forward in Spatial Option 1, and the fourth tract is associated with preventing the sprawl of Blackpool and Poulton le Fylde where, adjacent to which,	National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information.

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	some growth might be contemplated in Spatial Option 2. On this basis, whereby the areas of Green Belt are located in the parts of the district where new housing growth to 2042 is planned to take place, a Green Belt Review is therefore justified and must be carried out to ensure that the most appropriate and sustainable sites for new housing development are selected for allocation in the new Local Plan. This is especially the case when previously developed land in Green Belt, including that owned by our clients at Warton, qualifies as grey belt which the Council should identify and prioritise in promoting sustainable patterns of development as required by NPPF 148.	
Woodland Trust	The Woodland Trust supports the Council's proposal that the Green Belt should not be reviewed. We agree that there are no exceptional circumstances that would justify altering Green Belt boundaries in Fylde. The Green Belt provides critical benefits, including the protection of the countryside, provision of accessible green space and support for biodiversity and ecosystem services. Retaining its boundaries will help ensure that Fylde's natural and recreational assets, including woodland and wildlife habitats, are safeguarded for current and future generations.	Comments noted. Please refer to Strategic Policy DST3: Green Belt for further information.

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
Alban Cassidy	We see no justification for an Area of Separation Policy and a Green Belt policy which overlap on a number of principles.	Yes		Comments noted. Policy on Areas of Separation and Green Belt both act to limit development in the areas so designated. They apply to different geographical areas for sound planning reasons. The fact that there are similar principles is not in itself a reason to remove the Areas of Separation policy from the emerging Local Plan. Strategic Policy DST4: Areas of Separation will help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Strategic Policy DST3: Green Belt outlines the purposes of the Green Belt and protects it from

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				development. Please refer to Policy for further information.
Bryning with Warton Parish Council	yes	Yes	No	Comments noted.
Christine Abbott	I would support additional Areas of Separation in order to prevent urban sprawl. All towns seem to be merging together, for example Bartle and Lea is encroaching upon Newton, and losing their identity. Areas of separation should not be used by Developers to exercise their mitigation requirements.	No	Between Freckleton and Lytham.	Comments noted. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
				Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Regarding question 44, the Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Please refer to Strategic Policy DST4 Areas of Separation for further information.
David Chedd	Yes	No	Between Elswick and Medlar-with-Wesham and between Elswick and Great Eccleston.	Comments noted. The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate

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				recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Please refer to Strategic Policy DST4 Areas of Separation for further information.
Emma Swindells		Yes		Comments noted.
Ethan Ellison	Yes. A step below green Belt which then can be released for special need instead of green belt.	No		Comments noted. In order to help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements, policy DST4 defines Areas of Separation. An Area of Separation is different to Green Belt: it is of a significantly smaller scale and located between settlement boundaries that are relatively close and at risk of merging. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
				Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Please refer to Strategic Policy DST4: Areas of Separation for further information.
Frank Andrews	yes	Yes		Comments noted.
Gerard Malone	Maybe	Yes		Comments noted.
Hannah Dell'Armi		Yes	the area south of wrea green between there and warton, that area runs the risk of merging as new developments seek to build up from warton and down from wrea green	Comments noted. The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Please refer to Strategic Policy DST4 Areas of Separation for further information.

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
Irene Jacques	Yes.	No		Comments noted.
John Leadbeater	Yes	No		Comments noted.
John Maskell	Yes	No	Between Wrea Green and Warton should be an Area of Separation	Comments noted. The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Please refer to Strategic Policy DST4 Areas of Separation for further information.
Keith McKay	Yes	Yes		Comments noted.
Linda Nulty		Yes	Maybe	Comments noted.

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Lytham St Annes Civic Society	Yes	Yes		Comments noted.
Marcus Dowling	Yes	Yes		Comments noted.
Martin Alderman	Test	No	Test	Comments noted.
Stephen and Jacqueline Croft	Yes - the space between villages and Towns is vital to maintaining character and well being and civic pride in the area	Yes	A review could re-asset and strengthen the policy ...	Comments noted and supported. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Please refer to Strategic Policy DST4 Areas of Separation for further information. Regarding question 44 please refer to Strategic Policy DST4 Areas of Separation for further information.

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
Susan Lee	Yes it's important that current settlements keep their identities and don't just merge into an urban sprawl	No	Warton and Freckleton Warton and Lytham	Comments noted and supported. Please refer to Strategic Policy DST4 Areas of Separation for further information. Regarding question 44 the Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Please refer to Strategic Policy DST4 Areas of Separation for further information.
Emery Planning for Persimmon & Charles Church		6.1 The Area of Separation policies need to be reviewed in the context of meeting future		In order to help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements, policy DST4 defines Areas of Separation. An Area of Separation is different to Green Belt: it is of a significantly smaller scale and located between

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
		development needs. If Areas of Separation are to be retained, then land should not be retained land where it is not necessary to maintain the strategic gap between the settlements. In relation to our clients' land at New Hey Farm, Kirkham can come forward without prejudicing the identity of Kirkham and Newton.		settlement boundaries that are relatively close and at risk of merging. The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. Land within the areas designated as areas of separation is not required in order to meet development needs. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham.
Gladman	4.6.5 Gladman notes that the existing areas designated separate Newton and Wrea Green from Kirkham. Gladman		4.6.7 Gladman submits that the Council should not designate additional Areas of Separation through the	In order to help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements, policy DST4 defines Areas of Separation. An Area of

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
	acknowledges that the existing Areas of Separation play an important role in maintaining openness and preventing these relatively close settlements from merging due to being more restrictive than the existing countryside policy. 4.6.6 The Council should only include land within the Areas of Separation that plays an important role in maintaining separation between settlements and should balance the aims of the policy against the requirement to meet housing needs. Gladman submits that there should be sufficient land available outside of these areas that can come forward for residential development over the emerging plan period to meet housing needs in full.		new Local Plan. As their purpose is to separate relatively close settlements, they should only be designated where it is considered there is potential for narrow gaps between settlements to be compromised over time. Gladman considers that the current scope of the policy effectively addresses those settlements at risk of merging. Therefore, no further Areas of Separation should be designated in the borough.	Separation is different to Green Belt: it is of a significantly smaller scale and located between settlement boundaries that are relatively close and at risk of merging. The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4 Areas of Separation for further information. Regarding question 44 the policy has been reviewed for the new Local Plan. The boundary of

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
				the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Please refer to Strategic Policy DST4 Areas of Separation for further information.
Historic England	Areas of separation can impact heritage assets and their setting and influence the character and identity of settlements.	No comment.	No comment.	Comments noted. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Please refer to Strategic Policy DST4 Areas of Separation for further information.
Home Builders Federation		Areas of Separation		An Area of Separation is designed to preserve the character and distinctiveness of individual

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
		28. The HBF would recommend that the Areas of Separation are reviewed. The housing growth that the Borough will need to accommodate over the plan period will clearly present a challenge. To identify sustainable locations to meet this need, there will be a need to review designations such as Areas of Separation and seek to balance this against the		settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Land within the areas designated as areas of separation is not required in order to meet development needs. Please refer to Strategic Policy DST4: Areas of Separation for further information.

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
		updated housing requirement.		
National Highways	Q42. WSP recommend 'no comment' to this question.	Q43. No comment.	Q44. No comment.	Noted.
Newton With Clifton Parish Council	Options, issues, vision and scope for the new Fylde local plan to 2042. Further to recent communications council considered the matter at a meeting held on Thursday 9th October 2025. Members agreed that Fylde borough council local planning authority (LPA) should from the outset prioritise the following issues. a) Areas of separation (AOS) i) Members considered it of paramount importance to avoid areas of separation (AOS), locations constrained by biodiversity, green belt designation, flood risk, or public open spaces.	Options, issues, vision and scope for the new Fylde local plan to 2042. Further to recent communications council considered the matter at a meeting held on Thursday 9th October 2025. Members agreed that Fylde borough council local planning authority (LPA) should from the outset prioritise the following issues.	ii) Moreover council recommend the LPA initiate a process to designate a new AOS between Clifton and the Preston city council boundary.	Comments noted. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements.

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
	Accordingly the LPA is expected to prioritise and vigorously protect the existing four tracts of designated green belt and two designated areas of separation (AOS). ii) Moreover council recommend the LPA initiate a process to designate a new AOS between Clifton and the Preston city council boundary. iii) Members consider both the above recommendations are necessary for designating specific boundaries on the local plan delineating a physical separation between settlements that will be maintained to preserve the identity of individual settlements, and ensure any future development within the gap maintains its separation function.	a) Areas of separation (AOS) i) Members considered it of paramount importance to avoid areas of separation (AOS), locations constrained by biodiversity, green belt designation, flood risk, or public open spaces. Accordingly the LPA is expected to prioritise and vigorously protect the existing four tracts of designated green belt and two designated areas of separation (AOS).		The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Please refer to Strategic Policy DST4: Areas of Separation for further information. With regards to suggestions for a new Area of Separation, the Council has produced the Area of Separation Background paper (June 2026) which considers the need for policy protection, being an Area of Separation, between Clifton and Preston. There is a distance of 1.96km between Clifton and the nearest developed part of Preston. As the Central Lancashire Local Plan is delivered the settlements of Preston and Clifton will become closer, however there will be an area that is 1.6km wide which will remain undeveloped so that the settlements are not within 1200m of each other, with part of this distance being within Preston. There is no justification through development pressure for the designation of a 600m wide area between Clifton and the borough boundary. The

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		ii) Moreover council recommend the LPA initiate a process to designate a new AOS between Clifton and the Preston city council boundary. iii) Members consider both the above recommendations are necessary for designating specific boundaries on the local plan delineating a physical separation between settlements that will be maintained to preserve the		recommendation of the background paper was to not take forward the area between Clifton and Preston as an area of separation.

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		identity of individual settlements, and ensure any future development within the gap maintains its separation function.		
Pegasus Group for Rowland Homes	5.1. The existing Local Plan has identified areas that, whilst not covered by Green Belt, are critical for maintaining openness between settlements. The Area of Separation policy in the existing Local Plan is the response to this situation and there is one to the east of Wrea Green, separating it from Kirkham. 5.2. The justification for these areas is clear in so far as it was identified that there was potential for the gap to be compromised over time,	5.3. This situation remains unchanged. In particular, regarding the potential merging of Wrea Green and Kirkham, the existing gap between the two settlements has been highly effective, as there has been limited development within this area.	5.4. Furthermore, if development was to be directed to Wrea Green in the emerging Plan, as expected, then there are plenty of other options to accommodate development without compromising this area of separation.	Comments noted. There is a clear hierarchy of designations with green belt affording the most protection, areas of separation a lesser degree of protection and the countryside area a lesser degree of protection. This was found to be sound under the previous Local Plan examination. Land within the areas designated as areas of separation is not required in order to meet development needs.

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	leading to the progressive coalescence of settlements and loss of distinct identity.	Updating the evidence base would be worthwhile to ensure the area of separation continues to function effectively; however, it is not expected to result in a significant change of the Wrea Green – Kirkham area of separation.		
PWA Planning for Medicom	7.6. While the School Farm site is located within the Green Belt, the principles we advocate for regarding a flexible, evidence-led approach to restrictive designations are equally applicable to Areas of Separation and the Countryside.			An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection.

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
	7.7. We object to any policy framework that applies a blanket restriction on development without allowing for a proportionate assessment of a site's individual merits and its contribution to sustainable development. The new Local Plan must move away from the rigid "red line" based approach of the past and embrace the flexibility of the NPPF. This is essential if the Council is to provide a positive framework for the housing and other development the borough needs to 2042.			The policy has been reviewed for the new Local Plan. The policy seeks to restrict development to a greater degree than the countryside policy in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information.
PWA Planning for Pringle Homes	7.1. Pringle Homes is committed to creating high-quality developments that respect and enhance the local environment. Our proposed scheme at Greenlands Farm, Wrea Green, is a landscape-led	7.7. Therefore, while the designation could be continued in principle, the associated policy must be	7.8. No. We strongly discourage the designation of any additional Areas of Separation. The primary objective of the new Local Plan must be to identify and allocate sufficient land	Comments noted. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in

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	design that incorporates significant open space, creates new habitats, and respects the local character. 7.2. However, for such sustainable developments to come forward, the new Local Plan's policies for protected areas must be proportionate, evidence-based, and consistent with the NPPF. Overly restrictive local designations, such as the current 'Area of Separation' and 'Countryside' policies, can act as a barrier to delivering much-needed housing in the most sustainable locations. 7.3. We do not object to the principle of using local policy to prevent settlement coalescence. However, like Green Bet, it is crucial to recognise that not all land within an Area of	fundamentally reviewed. This review should, as a minimum: 1. Introduce a Differentiated Approach: The policy must be amended to incorporate principles analogous to the NPPF's "grey belt" policy. It must require an evidence-led assessment of how individual land parcels contribute to the core purpose of the AoS. This would allow for the potential release of previously developed sites	to meet the borough's significantly increased development needs, in line with the government's core objective to "significantly boost the supply of homes". 7.9. Creating new layers of restrictive local policy designations would run entirely contrary to this national priority. The focus of the plan-making process must be on enabling and delivering sustainable development, not on introducing new and unjustified barriers that will further constrain the supply of land for much-needed homes and businesses. The existing suite of national and local designations is more than sufficient to protect the borough's most sensitive and valuable landscapes.	response to concerns that there was potential for settlements to merge without further protection. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Regarding question 43, the policy has been reviewed for the new Local Plan. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Regarding question 44, the policy has been reviewed for the new Local Plan. Areas of Separation shown on the Policies Map are

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	Separation is of equal value or importance to that designation's purpose. The existing AoS policy (Policy GD3) is a blunt instrument that has been rendered illogical and unsound by the evolution of national Green Belt policy and must be comprehensively reviewed. 7.4. The primary flaw is that this local designation is now demonstrably more restrictive than the national Green Belt designation. This creates a policy conflict that undermines the plan's ability to deliver the most sustainable pattern of development. 7.5. The NPPF's "grey belt" policy provides a mechanism to identify less sensitive Green Belt land where development is not inappropriate and does not require "very special circumstances" (paragraph	or other land within the AoS that does not fundamentally undermine the separation of settlements, perfectly illustrated by the opportunity at Greenlands Farm. 2. Ensure Consistency with National Policy: The policy should be treated similarly to NPPF paragraph 155, allowing for development on less sensitive parcels of land within the AoS. Critically, to support flexibility and the delivery of windfall sites,		designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Please refer to Strategic Policy DST4: Areas of Separation for further information. There is a clear hierarchy of designations with green belt affording the most protection, areas of separation a lesser degree of protection and the countryside area a lesser degree of protection. This was found to be sound under the previous Local Plan examination.

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	155). This allows for a proportionate planning judgment to be made, steering development to the most suitable locations. The current AoS policy has no such mechanism, treating all land within its boundary with equal, blanket restriction. This is illogical and inconsistent with the NPPF's core principle of making effective use of land. 7.6. The Greenlands Farm site at Wrea Green is a prime example of this policy failure. The site includes a significant area of derelict and unsightly former piggery buildings which actively detract from the character and openness of the area. A blanket policy that prevents the comprehensive and sustainable redevelopment of	this policy should not be contingent on the Council having a deficit in its five-year housing land supply, thereby enabling both allocations and sustainable windfall applications to be identified and approved. 3. Conduct an Evidence-Led Boundary Review: A review of the AoS boundaries is essential to ensure they are tightly drawn and only cover land that, based on robust evidence, is genuinely critical to		

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	this partially brownfield site is perverse. The proposal for Greenlands Farm is not an encroachment into an open gap, but a logical extension to a Tier 1 settlement that delivers a significant environmental and visual enhancement by removing these derelict structures. The current AoS policy is too rigid to recognise these substantial benefits, proving the need for a fundamental review.	maintaining the identity and distinctiveness of the settlements. Land that makes only a weak or negligible contribution to this purpose should be removed from the designation.		
PWA Planning for Ribby Hall	4.2. We do not object to the principle of using local policy to prevent settlement coalescence. However, like Green Belt, it is crucial to recognise that not all land within an Area of Separation is of equal value or importance to that designation's purpose. The	4.5. Therefore, while the designation could be continued in principle, the associated policy must be fundamentally reviewed. This review should, as	4.6. No. We strongly discourage the designation of any additional Areas of Separation. The primary objective of the new Local Plan must be to identify and allocate sufficient land to meet the borough's significantly increased	Comments noted. There is a clear hierarchy of designations with green belt affording the most protection, areas of separation a lesser degree of protection and the countryside area a lesser degree of protection. This was found to be sound under the previous Local Plan examination. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence

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	existing AoS policy (Policy GD3) is a blunt instrument that has been rendered illogical and unsound by the evolution of national Green Belt policy and must be comprehensively reviewed. 4.3. The primary flaw is that this local designation is now demonstrably more restrictive than the national Green Belt designation. This creates a policy conflict that undermines the plan's ability to deliver the most sustainable pattern of development. 4.4. The NPPF's "grey belt" policy provides a mechanism to identify less sensitive Green Belt land where development is not inappropriate and does not require "very special circumstances" (paragraph 155). This allows for a proportionate planning judgment to be	a minimum: 1. Introduce a Differentiated Approach: The policy must be amended to incorporate principles analogous to the NPPF's "grey belt" policy. It must require an evidence-led assessment of how individual land parcels contribute to the core purpose of the AoS. This would allow for the potential release of previously developed sites or other land within the AoS that does not	development needs, in line with the government's core objective to "significantly boost the supply of homes". 4.7. Creating new layers of restrictive local policy designations would run entirely contrary to this national priority. The focus of the plan-making process must be on enabling and delivering sustainable development, not on introducing new and unjustified barriers that will further constrain the supply of land for much-needed development. The existing suite of national and local designations is more than sufficient to protect the borough's most sensitive and valuable landscapes.	of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Regarding question 43, the policy has been reviewed for the new Local Plan. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information.

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	made, steering development to the most suitable locations. The current AoS policy has no such mechanism, treating all land within its boundary with equal, blanket restriction. This is illogical and inconsistent with the NPPF's core principle of making effective use of land.	fundamentally undermine the separation of settlements, such as the proposed amendment to the Ribby Hall Village allocation. 2. Ensure Consistency with National Policy: The policy should be treated similarly to NPPF paragraph 155, allowing for development on less sensitive parcels of land within the AoS. 3. Conduct an Evidence-Led Boundary Review: A review of the AoS boundaries is essential to ensure they are		Regarding question 44, the policy has been reviewed for the new Local Plan. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Please refer to Strategic Policy DST4: Areas of Separation for further information.

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		tightly drawn and only cover land that, based on robust evidence, is genuinely critical to maintaining the identity and distinctiveness of the settlements. Land that makes only a weak or negligible contribution to this purpose should be removed from the designation.		
PWA Planning	7.20. We do not object to the principle of using local policy to prevent settlement coalescence. However, just as with the Green Belt, it is crucial to recognise that not all land within an Area of Separation is	7.23. Therefore, while the designation could be continued in principle, the associated policy must be fundamentally	7.24. No. We strongly discourage the designation of any additional Areas of Separation. The primary objective of the new Local Plan must be to identify and allocate sufficient land to	Comments noted. There is a clear hierarchy of designations with green belt affording the most protection, areas of separation a lesser degree of protection and the countryside area a lesser degree of protection. This was found to be sound under the previous Local Plan examination. An Area of Separation is designed to preserve the character and distinctiveness of individual

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	of equal value or importance to that designation's purpose. The existing AoS policy (Policy GD3) is a blunt instrument that has been rendered illogical and unsound by the evolution of national Green Belt policy and must be comprehensively reviewed. 7.21. The primary flaw is that this local designation is now demonstrably more restrictive than the national Green Belt designation. This creates a policy conflict that undermines the plan's ability to deliver the most sustainable pattern of development. 7.22. The NPPF's "grey belt" policy provides a mechanism to identify less sensitive Green Belt land where development is not inappropriate and does not require "very special circumstances" (paragraph 155). This allows for a	reviewed. This review should, as a minimum: 1. Introduce a Differentiated Approach: The policy must be amended to incorporate principles analogous to the NPPF's "grey belt" policy. It must require an evidence-led assessment of how individual land parcels contribute to the core purpose of the AoS. This would allow for the potential release of previously developed sites or other land	meet the borough's significantly increased development needs, in line with the government's core objective to "significantly boost the supply of homes". 7.25. Creating new layers of restrictive local policy designations would run entirely contrary to this national priority. The focus of the plan-making process must be on enabling and delivering sustainable development, not on introducing new and unjustified barriers that will further constrain the supply of land for much-needed homes and businesses. The existing suite of national and local designations is more than sufficient to	settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Regarding question 43 the policy has been reviewed for the new Local Plan. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements.

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	proportionate planning judgment to be made, steering development to the most suitable locations. The current AoS policy has no such mechanism, treating all land within its boundary with equal, blanket restriction. This is illogical and inconsistent with the NPPF's core principle of making effective use of land.	within the AoS that does not fundamentally undermine the separation of settlements. 2. Ensure Consistency with National Policy: The policy should be treated similarly to NPPF paragraph 155, allowing for development on less sensitive parcels of land within the AoS. Critically, to support flexibility and the delivery of windfall sites, this policy should not be contingent on the Council having a deficit in its five-year	protect the borough's most sensitive and valuable landscapes.	Please refer to Strategic Policy DST4: Areas of Separation for further information. Regarding question 44 the policy has been reviewed for the new Local Plan. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Please refer to Strategic Policy DST4: Areas of Separation for further information.

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		housing land supply, thereby enabling both allocations and sustainable windfall applications to be identified and approved. 3. Conduct an Evidence-Led Boundary Review: A review of the AoS boundaries is essential to ensure they are tightly drawn and only cover land that, based on robust evidence, is genuinely critical to maintaining the identity and distinctiveness of the settlements. Land that makes		

Respondent name	(42) Would you support the continued identification of Areas of Separation in the new Local Plan? Please provide any explanation.	(43) Is there a need to review the boundaries of the Areas of Separation?	(44) Are there additional areas where the Areas of Separation policy should also apply? Please explain.	Council Response
		only a weak or negligible contribution to this purpose should be removed from the designation.		

Respondent name	(45) Do you support retention of the three-tier policies (Green Belt, Areas of Separation, Countryside) for the protection of open land within Fylde?	(46) Please give any further comments on how the Local Plan policies should operate outside settlement boundaries.	Council Response
Alban Cassidy	We see no need for AoS and the Green Belt should only apply [if at all] where it serves a genuine purpose that is fully in line with sustainable development principles and does not compromise the ability of the Local Plan to support sustainable patterns of growth.		(45) An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements. The Council considered the potential to establish Areas of Separation in response to concerns that there was potential for settlements to merge without further protection. Please refer to Strategic Policy: DST4 Areas of Separation for further information.

Respondent name	(45) Do you support retention of the three-tier policies (Green Belt, Areas of Separation, Countryside) for the protection of open land within Fylde?	(46) Please give any further comments on how the Local Plan policies should operate outside settlement boundaries.	Council Response
			The Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information.
Bryning with Warton Parish Council	Yes		Comment noted.
Christine Abbott	Yes		Comment noted.
David Chedd	Yes	No further development other than redevelopment outside settlement boundaries.	Comments noted.
Emma Swindells	Yes		Comment noted.

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Ethan Ellison	Yes	Should allow flexibility for agricultural and supporting businesses to grow and develop, especially around renewables to ensure consistency and reduce appeals if the policy is clear.	Comments noted. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Please refer to Strategic Policy DST4: Areas of Separation or further information. Strategic Policy DST5: The Countryside will implement a criteria base which assesses development proposals to be permitted. Please refer to the Policy for further information.
Gerard Malone	Maybe		Comment noted.
Irene Jacques	Yes I support this		Comment noted.
John Leadbeater	Yes	The assumption here is that policies will not undermine the need to protect areas of habitat eg. bat colonies	(45) Comment noted. (46) The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be

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			encouraged. Please refer to Strategic Policy DST4: Areas of Separation for further information. Strategic Policy DST5: The Countryside will state that outside settlements, there will be a presumption against large scale development and those types of small-scale development that incrementally would result in uncontrolled sprawl. Policy DST5 therefore restricts development to those types which are appropriate to a rural area and support agriculture, other existing rural businesses and rural communities. An exception is provided for the existing developed sites identified in the policy, where there is a presumption for development within the sites in accordance with relevant policies. Please refer to Policy for further information.
John Maskell	Yes	There should be no major development on Green Belt, Areas of Separation and Countryside	Comments noted.
Keith McKay	Yes		Comment noted.
Linda Nulty	No - all should be Countryside for consideration		Comment noted.
Lytham St Annes Civic Society	Yes	Green Belt should include the coastal areas.	Comments noted. National policy notes that the general extent of Green Belts is established. It states that, once

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			established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. Please refer to Strategic Policy DST3: Green Belt for further information.
Marcus Dowling		Convert areas of separation into green belt	The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options.

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P Stanford		Countryside needs MORE priority – we are a rural area – so MORE thought and priority needed – move more into Green Belt	Comments noted. National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. It is the Council's view that there are no exceptional circumstances that would lead to the conclusion that additional land should be added to the existing Green Belt.
Stephen and Jacqueline Croft	Yes - serve different purposes and seems a reasonable categorization	With broader and longer consultation with better communication of options and proposals to the communities affected	Comments noted. The Council follows national guidance for consultation periods which was followed for consultation under regulation 18 and will also be followed during the consultation under regulation 19.
Steven Abbott		Allocations are essential outside the existing settlement boundaries. Areas should be identified for development beyond allocations to allow room for growth within and beyond the plan period. This will assist with infrastructure planning.	The Development Strategy will direct where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. Please refer to Strategic Policy DST1: The Development Strategy for further information. Strategic Policy DST2: Settlement Boundaries outlines that boundaries for the settlements listed in the settlement hierarchy have been identified and are shown on the Policies map. The boundaries have been drawn to include all Local Plan allocations. Please refer to the Policy for further information.

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Susan Lee	Yes, maybe more areas of green belt as the Fylde is rural		National policy notes that the general extent of Green Belts is established. It states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. It is the Council's view that there are no exceptional circumstances that would lead to the conclusion that additional land should be added to the existing Green Belt.
Defence infrastructure Organisation		Weeton Barracks is recognised under existing policy GD5 as a large developed site in the countryside. The supporting text to this policy sets out that the policy is mainly in regard to future alternative use of the site and makes no provision for the future development needs of the site when retained for its existing use. As set out in our answer to question 46 it is necessary for the Plan to accommodate future defence needs at Weeton Barracks and MOD Inskip. Whilst settlement boundaries are important to control and direct development in the most	Strategic Policy DST5: The Countryside gives a lower standard of protection than Green Belt or Area of Separation policies. The principle is to seek to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. The Policy highlights that there a number of large developed sites in open land outside settlement boundaries within Fylde, such as Weeton Barracks and that development proposals within these sites will be assessed against the specific policies that apply to them, rather than the provisions of the generally restrictive policy for the countryside. Weeton Barracks is a non-strategic location for development – whereby development is not allocated on a proportionate basis, but rather based on a choice of available sites that most represent sustainable development.

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		sustainable manner, for defence purposes it is essential that the whole of the land holding can be used in the most efficient and effective way so that it can contribute to defence outputs. The current countryside designation is a constraint to maximising defence output. The new local plan, as discussed in our response to question 46, provides the opportunity to align with national priorities and positively plan for the future development of the site, whilst responding to constraints but not being stifled by them. The Plan provides the opportunity to remove the site from the countryside designation, or ensure a policy is written to make it clear that as an existing major developed site in the countryside there is no restriction on sustainable development.	Strategic Policy HOU7: Weeton Barracks Service Accommodation states that the Council will support schemes to enhance, replace and provide additional accommodation to meet the needs of military service personnel and their families within the Weeton Barracks site, as defined on the Policies Map. Please refer to the Policy for further information.
DLP Planning for BAE Systems		The Countryside BAE Systems does not object to	In the countryside, Policy DST5 gives a lower standard of protection than Green Belt or Area of Separation policies. The principle is to seek to allow uses

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		the principle of a three-tiered approach to the protection of open land within Fylde. However, it is considered that the Countryside designation should be less restrictive than a Green Belt designation. Where the boundary of the Countryside designation is drawn tight to existing boundaries there may need to be flexibility in the Countryside policy to allow the encroachment of development into the Countryside in some instances. To not do so would make the Countryside designation just as restrictive as Green Belt policy. In particular, where the Countryside designation boundary is drawn tight to the edge of a site of strategic importance, such as Warton Aerodrome, the corresponding policy should provide flexibility to allow for the expansion of that facility in the Countryside where the development would not harm the	appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. Please refer to Strategic Policy DST5: The Countryside for further information. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. The change is shown in Appendix 4. Please refer to Strategic Policy DST3: Green Belt for further information. Strategic Policy ECD1: BAE Systems, Warton protects the area and surrounding area - Development proposals that could compromise the security of the Warton Aerodrome and wider BAE Systems site at Warton will not be permitted. Please refer to Policy for further information.

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		role of the wider Countryside designation. The boundary of the Countryside designation is drawn tight to the eastern boundary of Warton Aerodrome. This therefore prevents the expansion of the Aerodrome to the east. Given the exceptional circumstances referred to above to allow for the expansion of Warton Aerodrome beyond its existing boundaries, it is considered that flexibility should be provided to allow small scale expansions of the Aerodrome to the east into areas designated as Countryside. The Countryside area to the east of the Aerodrome (the land between the existing boundary of the Aerodrome, the River Ribble, Freckleton Pool and the southern edge Freckleton) already contains areas of development, some industrial in nature. Allowing small scale expansion of the Aerodrome into that area would not harm objectives of	

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		Countryside policy (preventing whole scale expansion of development in the Countryside or large isolated development in the Countryside). The consultation document proposes that development meeting local community needs would be permitted in the Countryside (paragraph 6.37 of the consultation document). It is considered that this should be extended to meeting the needs of existing strategic employment facilities to provide the flexibility for expansion to meet their needs.	
Gladman	4.6.8 Gladman supports the new Local Plan retaining each protection level for open land within Fylde. Gladman considers the three policies to be necessary in promoting sustainable development across the borough and believes they function effectively in combination.	4.6.9 Gladman encourages the Council to develop a flexible and permissive countryside policy that allows sustainable residential development to come forward outside of defined built-up areas on greenfield sites. This policy approach would allow sustainable windfall development to come forward to help meet the	Comments noted. Strategic Policy DST5: The Countryside will outline circumstances for development to be permitted in the countryside. Please refer to Policy for further information.

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		borough's housing requirement. Furthermore, the Council would be able address housing land supply shortfalls without the need to depart from the provisions of the emerging Local Plan. Critically, the Council would still have the flexibility to refuse a scheme if it was considered to be unsustainable. Overall, this policy approach would allow the Council to retain more control over where development is located in the borough. 4.6.10 Policy HOU5 (Residential Windfall Development in the Countryside) of the adopted Ashford Local Plan 2030 provides a good example of how this can be implemented in practice. The policy states, "Proposals for residential development adjoining or close to the existing built up confines of the following settlements will be acceptable: ... Providing that each of the following criteria is met:". In	

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		addition, Policy 6 (Development on Unallocated Sites) of the County Durham Plan provides a further example. The policy states, “The development of sites which are not allocated in the Plan or in a Neighbourhood Plan which are either (i) within the built-up area; or (ii) outside the built-up area (except where a settlement boundary has been defined in a neighbourhood plan) but well-related to a settlement, will be permitted provided the proposal accords with all relevant development plan policies and:”.	
Historic England	No comment.	Any option should avoid harm to the significance of heritage assets and their settings.	Comments noted. Strategic Policy ENT1: Historic Environment will ensure that proposals for development will conserve, protect and, where appropriate, enhance the character, appearance, significance and historic value of Fylde’s designated and undesignated heritage assets.
Home Builders Federation		The Countryside 29. The HBF considers that it is important that the new Local Plan can be as flexible as possible in	Comments noted. Strategic Policy DST5: The Countryside will outline circumstances for development to be permitted in the countryside. Please refer to Policy for further information.

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		accommodating future housing needs and this includes how it addresses land outside of the built-up area. 30. To support the Council in meeting its housing need, the HBF would discourage the use of arbitrary settlement boundaries and instead include positive planning policies which permit sustain-able sites to come forward which are well-related to the built-up area. This will ensure the potential for meaningful windfall development is maximised, which in turn can add further flexibility to the Council's housing supply	As for development proposals in the Green Belt, Strategic Policy DST3: Green Belt states that As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. One minor, non-strategic change to the Green Belt boundary has been made to land within the BAE Systems site at Warton, to ensure that strategic growth can be fully accommodated at the nationally-important site. Strategic Policy DST4: Areas of Separation states that development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the effectiveness of the gap between the settlements and, in particular, the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identify and distinctives of settlements. The Policy will outline what development will be limited to. Please refer to Policy for further information.
Lichfields for Taylor Wimpey	The Countryside Taylor Wimpey considers that the Council should undertake a review of its adopted countryside designation as part of the emerging Local Plan process, with a view to identifying	The Countryside Taylor Wimpey considers that the Council should undertake a review of its adopted countryside designation as part of the emerging Local Plan process, with	Strategic Policy DST5: The Countryside outlines circumstances which permit development in the Countryside. Please see Policy for further information. The Call for Sites process assessed each site using the SHELAA which identifies sufficient sites to meet needs that are suitable, available and achievable.

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	sustainable locations for future residential allocations. In its current form, the designation applies a blanket restriction on development, with limited exceptions, across designated countryside areas. This approach has increasingly come to the fore given the Council's current inability to demonstrate a five-year housing land supply, rendering vulnerability to speculative applications under the presumption in favour of sustainable development. A review of the countryside designation would allow the Council to proactively direct new development to the most sustainable locations, ensuring that local housing needs are met through planned and calculated residential allocations. It is not considered that there is sufficient available land within existing settlement boundaries to accommodate the level of growth required. For example, Taylor Wimpey's active	a view to identifying sustainable locations for future residential allocations. In its current form, the designation applies a blanket restriction on development, with limited exceptions, across designated countryside areas. This approach has increasingly come to the fore given the Council's current inability to demonstrate a five-year housing land supply, rendering vulnerability to speculative applications under the presumption in favour of sustainable development. A review of the countryside designation would allow the Council to proactively direct new development to the most sustainable locations, ensuring that local housing needs are met through planned and calculated residential allocations. It is not considered that there is sufficient available land within existing settlement boundaries to accommodate the level of growth	Regarding question 46, please see above response.

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	planning application for land north of Weeton Road demonstrates how a high-quality development can be sensitively delivered in a countryside location adjacent to the adopted Kirkham and Wesham Strategic Location for Development. This first phase proposes up to 250 dwellings, including policy compliant 30% affordable housing at a site well-related to the existing settlement and surrounding services. The proposal includes generous open space and amenity provision, enhanced connectivity through new pedestrian links, and proposed highway improvements, including new bus facilities on Weeton Road to benefit both future and existing residents. For instance, Taylor Wimpey's active planning application at the land North of Weeton Road demonstrates how a high-quality development can be formed in a countryside area adjacent to the adopted Kirkham and Wesham Strategic Location for Development. This first phase would deliver up to 250	required. For example, Taylor Wimpey's active planning application for land north of Weeton Road demonstrates how a high-quality development can be sensitively delivered in a countryside location adjacent to the adopted Kirkham and Wesham Strategic Location for Development. This first phase proposes up to 250 dwellings, including policy compliant 30% affordable housing at a site well-related to the existing settlement and surrounding services. The proposal includes generous open space and amenity provision, enhanced connectivity through new pedestrian links, and proposed highway improvements, including new bus facilities on Weeton Road to benefit both future and existing residents. For instance, Taylor Wimpey's active planning application at the land North of Weeton Road	

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	dwellings with provision of policy compliant 30% affordable housing at a site that is closely related to existing settlement and surrounding services. The proposal includes comprehensive open space and amenity provision, improved connectivity via new pedestrian links, and proposed highway improvements comprising new bus facilities on Weeton Road for future and existing residents. As outlined in the submitted Delivery Statement and Illustrative Masterplan, Taylor Wimpey has an option on a wider area of land beyond the current application site. There are strong prospects for future phases of development to the north and south of Weeton Road, supported by initial technical assessments. These include access and highways reviews by specialist consultants, and a sensitive landscaping strategy informed by a landscape architect. Sites with a strong evidence base demonstrating availability, achievability, and deliverability should be prioritised in	demonstrates how a high-quality development can be formed in a countryside area adjacent to the adopted Kirkham and Wesham Strategic Location for Development. This first phase would deliver up to 250 dwellings with provision of policy compliant 30% affordable housing at a site that is closely related to existing settlement and surrounding services. The proposal includes comprehensive open space and amenity provision, improved connectivity via new pedestrian links, and proposed highway improvements comprising new bus facilities on Weeton Road for future and existing residents. As outlined in the submitted Delivery Statement and Illustrative Masterplan, Taylor Wimpey has an option on a wider area of land beyond the current application site. There are strong prospects for future phases of development to the north and	

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	the site selection process for the emerging Local Plan. In summary, a review of the open countryside designation is essential to ensure that development needs can be met and that new growth is directed to the most sustainable locations. Sites that are well-related to key settlements should be assessed on their individual merits, rather than being constrained by rigid settlement boundaries. This approach will help maintain essential housing delivery throughout the plan period on sites that are truly deliverable.	south of Weeton Road, supported by initial technical assessments. These include access and highways reviews by specialist consultants, and a sensitive landscaping strategy informed by a landscape architect. Sites with a strong evidence base demonstrating availability, achievability, and deliverability should be prioritised in the site selection process for the emerging Local Plan. In summary, a review of the open countryside designation is essential to ensure that development needs can be met and that new growth is directed to the most sustainable locations. Sites that are well-related to key settlements should be assessed on their individual merits, rather than being constrained by rigid settlement boundaries. This approach will help maintain essential housing delivery	

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		throughout the plan period on sites that are truly deliverable.	
National Highways	Q45. Whilst not specifically relevant to National Highways, WSP recommend that the retention of the three-tier policies should be supported.	Q46. No comments at this stage. As the LP develops and sites identified for development that meets local community needs, it is recommended that National Highways is kept up to date on changes.	Comments noted. The Council will provide updates to National Highways throughout the process.
Newton With Clifton Parish Council		Options, issues, vision and scope for the new Fylde local plan to 2042. Further to recent communications council considered the matter at a meeting held on Thursday 9th October 2025. Members agreed that Fylde borough council local planning authority (LPA) should from the outset prioritise the following issues. a) Areas of separation (AOS) i) Members considered it of paramount importance to avoid areas of separation (AOS), locations constrained by biodiversity, green belt	Comments noted. The Council has produced the Area of Separation Background paper (June 2026) which considers the need for policy protection, being an Area of Separation, between Clifton and Preston. There is a distance of 1.96km between Clifton and the nearest developed part of Preston. As the Central Lancashire Local Plan is delivered the settlements of Preston and Clifton will become closer, however there will be an area that is 1.6km wide which will remain undeveloped so that the settlements are not within 1200m of each other, with part of this distance being within Preston. There is no justification through development pressure for the designation of a 600m wide area between Clifton and the borough boundary. The recommendation of the

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		designation, flood risk, or public open spaces. Accordingly the LPA is expected to prioritise and vigorously protect the existing four tracts of designated green belt and two designated areas of separation (AOS). ii) Moreover council recommend the LPA initiate a process to designate a new AOS between Clifton and the Preston city council boundary. iii) Members consider both the above recommendations are necessary for designating specific boundaries on the local plan delineating a physical separation between settlements that will be maintained to preserve the identity of individual settlements, and ensure any future development within the gap maintains its separation function.	background paper was to not take forward the area between Clifton and Preston as an area of separation. In the Local Plan to 2042, Strategic Policy DST4: Areas of Separation outlines the criteria for development within the Areas of Separation. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. Strategic Policy DST4 seeks to restrict development to a greater degree than the Countryside Policy in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. Please refer to Policy for further information. Strategic Policy DST3: Green Belt states that As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are

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			suitable, available and achievable within land that is not designated as Green Belt. Please refer to Policy for further information. The National Planning Policy Framework requires that a sequential risk-based approach to the location of development will be taken, meaning that development will be directed to sites at low risk of flooding. The sequential test requires that all sources of flooding are considered in making the assessment. Please refer to Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency for further information. Strategic Policy ENT5: Loss of Community, Leisure and Cultural Facilities and Services will provide protection of facilities in all parts of the Borough. Please refer to Policy for further information.
PWA Planning for Dixon Grange The Villa		5.1. This is arguably the most critical policy area the new Local Plan must address to be found sound and effective. The current restrictive approach is outdated, contrary to the spirit of the NPPF, and acts as a major barrier to delivering sustainable development. We advocate for a fundamental change in approach, based on the following principles: 1. Abolish Restrictive	Comments noted. Policy GD4 will be replaced with Strategic Policy DST5: The Countryside which identifies areas outside settlements which are not identified as Green Belt or Areas of Separation as Countryside Areas. The Policy will outline criteria which permits development in the Countryside. Please see Policy for further information. There is a hierarchy of designations on land outside settlement boundaries in Fylde, with the greatest level of protection offered to the Green Belt, followed by Areas of Separation and finally the Countryside. All land

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		Designations: The new Plan must remove the concepts of defined settlement boundaries and the restrictive 'Open Countryside' designation. Policies like Policy GD4 in the current plan, with its closed list of exceptions, effectively place a veto on most forms of development and prevent proposals from being judged on their individual merits. This is a crude and inflexible tool that is no longer fit for purpose. 2. Adopt a Positive, Criteria-Based Policy: These outdated policies should be replaced with a single, positive, criteria-based policy for all land not covered by a national designation (like Green Belt). This policy should assess proposals against their sustainability credentials, rather than their location relative to an arbitrary line on a map. Key considerations should be the demonstrated need for the development and its sustainability in terms of design, landscape	outside settlement boundaries in Fylde is within either the Green Belt or the Areas of Separation or the Countryside. Please refer to Strategic Policy DST3: Green Belt, Strategic Policy DST4: Areas of Separation and Strategic Policy DST5 The Countryside for further information.

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		impact, and access to services by sustainable modes. 3. Reflect the NPPF's Nuanced View of the Countryside: The NPPF requires that planning policies should recognise "the intrinsic character and beauty of the countryside". Crucially, it requires recognition, not outright preservation or a veto on all development. The Framework does not state that all countryside is of equal value or that it should be fossilised. A blanket policy that prevents sustainable development is not an acceptable interpretation of this requirement. A criteria-based policy allows the Council to make a balanced judgment, permitting well-designed, necessary development in less sensitive locations while protecting the most valuable landscapes from significant harm. 5.2. In summary, the new Local Plan must move away from a	

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		rigid, "red line" based approach and embrace the flexibility and pro-sustainability ethos of the NPPF. This is essential if the Plan is to provide a positive framework for the housing, employment, and other development the borough needs to 2042.	
PWA Planning for Pringle Homes	7.10. In principle, a hierarchical approach to land protection is logical. However, we cannot support the retention of the current three-tier system in its existing form because it is illogical and internally inconsistent. As we have argued previously, the evolution of national Green Belt policy in the NPPF has created a perverse situation where the local "Area of Separation" designation is now demonstrably more restrictive than the national Green Belt designation. 7.11. This anomaly undermines the entire premise of a coherent policy hierarchy as it unfairly penalises sustainable edge-of-settlement sites, such as Greenlands Farm, more heavily	7.12. This is arguably the most critical policy area the new Local Plan must address to be found sound and effective. The current restrictive approach is outdated, contrary to the spirit of the NPPF, and acts as a major barrier to delivering sustainable development. We advocate for a fundamental change in approach, based on the following principles: 1. Abolish Restrictive Designations: The new Plan must remove the concepts of defined settlement boundaries and the restrictive 'Open Countryside' designation. Policies like Policy GD4 in the current plan, with its	There is a hierarchy of designations on land outside settlement boundaries in Fylde, with the greatest level of protection offered to the Green Belt, followed by Areas of Separation and finally the Countryside. All land outside settlement boundaries in Fylde is within either the Green Belt or the Areas of Separation or the Countryside. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the

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	than some land within the national Green Belt. For the three-tier system to be sound and justifiable, the policies applied to each tier must be proportionate to its status. This requires a fundamental review of the Areas of Separation policy to bring it into line with the nuanced, evidence-led approach now applied to the Green Belt, including mechanisms to assess the contribution of individual land parcels and release those that are less sensitive. Without this review, the three-tier system is flawed and unsound.	closed list of exceptions, effectively place a veto on most forms of development and prevent proposals from being judged on their individual merits. This is a crude and inflexible tool that is no longer fit for purpose. 2. Adopt a Positive, Criteria-Based Policy: These outdated policies should be replaced with a single, positive, criteria-based policy for all land not covered by a national designation (like Green Belt). This policy should assess proposals against their sustainability credentials, rather than their location relative to an arbitrary line on a map. Key considerations should be the demonstrated need for the development and its sustainability in terms of design, landscape impact, and access to services by sustainable modes. 3. Reflect the NPPF's Nuanced View of the Countryside: The NPPF requires that planning policies should recognise "the	Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information. Policy GD4 will be replaced with Strategic Policy DST5: The Countryside which identifies areas outside settlements which are not identified as Green Belt or Areas of Separation as Countryside Areas. The Policy will outline criteria which permits development in the Countryside. Please see Policy for further information. There is a hierarchy of designations on land outside settlement boundaries in Fylde, with the greatest level of protection offered to the Green Belt, followed by Areas of Separation and finally the Countryside. All land outside settlement boundaries in Fylde is within either the Green Belt or the Areas of Separation or the Countryside. Please refer to Strategic Policy DST3: Green Belt, Strategic Policy DST4: Areas of Separation and Strategic Policy DST5 The Countryside for further information.

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		intrinsic character and beauty of the countryside". Crucially, it requires recognition, not outright preservation or a veto on all development. The Framework does not state that all countryside is of equal value or that it should be fossilised. A blanket policy that prevents sustainable development is not an acceptable interpretation of this requirement. A criteria-based policy allows the Council to make a balanced judgment, permitting well-designed, necessary development in less sensitive locations while protecting the most valuable landscapes from significant harm. 4. Genuinely Support Windfall Development: Paragraph 73d of the NPPF explicitly requires local planning authorities to "support the development of windfall sites through their policies and decisions". A restrictive countryside policy is in direct contradiction to	

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		this national mandate. It actively discourages rather than supports the delivery of sustainable windfall sites. Adopting a flexible, criteria-based approach is the only way for the Council to create a policy framework that genuinely supports the principle of windfall development and helps maintain a robust housing supply. 5. Adopt a More Liberal Definition of "Infill": The Council's current interpretation of what constitutes "infill development" is often applied far too strictly, preventing logical and sustainable small-scale development within or on the edge of existing groups of buildings. The new Plan must adopt a more pragmatic and liberal definition, consistent with the NPPF's aim of making the most effective use of land and supporting organic growth in settlements. 7.13. In summary, the new Local Plan must move away from a rigid, "red line" based approach	

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		and embrace the flexibility and pro-sustainability ethos of the NPPF. This is essential if the Plan is to provide a positive framework for the housing, employment, and other development the borough needs to 2042.	
PWA Planning for Ribby Hall	4.8. In principle, a hierarchical approach to land protection is logical. However, we cannot support the retention of the current three-tier system in its existing form because it is illogical and internally inconsistent. As we have argued previously, the evolution of national Green Belt policy in the NPPF has created a perverse situation where the local "Area of Separation" designation is now demonstrably more restrictive than the national Green Belt designation. 4.9. For the three-tier system to be sound and justifiable, the policies applied to each tier must be proportionate to its status. This requires a fundamental review of the Areas of Separation policy to bring it		The Plan will adopt a hierarchy of designations on land outside settlement boundaries in Fylde, with the greatest level of protection offered to the Green Belt, followed by Areas of Separation and finally the Countryside. All land outside settlement boundaries in Fylde is within either the Green Belt or the Areas of Separation or the Countryside. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information.

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	into line with the nuanced, evidenced approach now applied to the Green Belt, including mechanisms to assess the contribution of individual land parcels and release those that are less sensitive. Without this review, the three-tier system is flawed and unsound.		In order to help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements, policy DST4 defines Areas of Separation. An Area of Separation is different to Green Belt: it is of a significantly smaller scale and located between settlement boundaries that are relatively close and at risk of merging. The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Areas outside settlements which are not identified as Green Belt or Areas of Separation are identified as Countryside Areas. In the countryside, Policy DST5 gives a lower standard of protection than Green Belt or Area of Separation policies. The principle is to seek to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by

Respondent name	(45) Do you support retention of the three-tier policies (Green Belt, Areas of Separation, Countryside) for the protection of open land within Fylde?	(46) Please give any further comments on how the Local Plan policies should operate outside settlement boundaries.	Council Response
			urbanising development. Please refer to Strategic Policy DST5: The Countryside for further information.
PWA Planning	7.26. In principle, a hierarchical approach to land protection is logical. However, we cannot support the retention of the current three-tier system in its existing form because it is illogical and internally inconsistent. As we have argued previously, the evolution of national Green Belt policy in the NPPF has created a perverse situation where the local "Area of Separation" designation is now demonstrably more restrictive than the national Green Belt designation. 7.27. This anomaly undermines the entire premise of a coherent policy hierarchy. For the three tier system to be sound and justifiable, the policies applied to each tier must be proportionate to its status. This requires a fundamental review of the Areas of Separation policy to bring it into line with the nuanced, evidence-led approach now applied to the Green Belt, including mechanisms to assess	7.28. This is arguably the most critical policy area the new Local Plan must address to be found sound and effective. The current restrictive approach is outdated, contrary to the spirit of the NPPF, and acts as a major barrier to delivering sustainable development. We advocate for a fundamental change in approach, based on the following principles: 1. Abolish Restrictive Designations: The new Plan must remove the concepts of defined settlement boundaries and the restrictive 'Open Countryside' designation. Policies like Policy GD4 in the current plan, with its closed list of exceptions, effectively place a veto on most forms of development and prevent proposals from being judged on their individual merits.	The Plan will adopt a hierarchy of designations on land outside settlement boundaries in Fylde, with the greatest level of protection offered to the Green Belt, followed by Areas of Separation and finally the Countryside. All land outside settlement boundaries in Fylde is within either the Green Belt or the Areas of Separation or the Countryside. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information. In order to help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements, policy DST4 defines Areas of Separation. An Area of Separation is different to Green

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	the contribution of individual land parcels and release those that are less sensitive. Without this review, the three-tier system is flawed and unsound.	This is a crude and inflexible tool that is no longer fit for purpose. 2. Adopt a Positive, Criteria-Based Policy: These outdated policies should be replaced with a single, positive, criteria-based policy for all land not covered by a national designation (like Green Belt). This policy should assess proposals against their sustainability credentials, rather than their location relative to an arbitrary line on a map. Key considerations should be the demonstrated need for the development and its sustainability in terms of design, landscape impact, and access to services by sustainable modes. 3. Reflect the NPPF's Nuanced View of the Countryside: The NPPF requires that planning policies should recognise "the intrinsic character and beauty of the countryside". Crucially, it requires recognition, not outright preservation or a veto on all development. The	Belt: it is of a significantly smaller scale and located between settlement boundaries that are relatively close and at risk of merging. The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Areas outside settlements which are not identified as Green Belt or Areas of Separation are identified as Countryside Areas. In the countryside, Policy DST5 gives a lower standard of protection than Green Belt or Area of Separation policies. The principle is to seek to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. Please refer to Strategic Policy DST5: The Countryside for further information. Policy GD4 will be replaced with Strategic Policy DST5: The Countryside which identifies areas outside

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		Framework does not state that all countryside is of equal value or that it should be fossilised. A blanket policy that prevents sustainable development is not an acceptable interpretation of this requirement. A criteria-based policy allows the Council to make a balanced judgment, permitting well-designed, necessary development in less sensitive locations while protecting the most valuable landscapes from significant harm. 4. Genuinely Support Windfall Development: Paragraph 73d of the NPPF explicitly requires local planning authorities to "support the development of windfall sites through their policies and decisions". A restrictive countryside policy is in direct contradiction to this national mandate. It actively discourages rather than supports the delivery of sustainable windfall sites. Adopting a flexible, criteria-based approach is the	settlements which are not identified as Green Belt or Areas of Separation as Countryside Areas. The Policy will outline criteria which permits development in the Countryside. Please see Policy for further information. There is a hierarchy of designations on land outside settlement boundaries in Fylde, with the greatest level of protection offered to the Green Belt, followed by Areas of Separation and finally the Countryside. All land outside settlement boundaries in Fylde is within either the Green Belt or the Areas of Separation or the Countryside. Please refer to Strategic Policy DST3: Green Belt, Strategic Policy DST4: Areas of Separation and Strategic Policy DST5 The Countryside for further information.

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		only way for the Council to create a policy framework that genuinely supports the principle of windfall development and helps maintain a robust housing supply. 5. Adopt a More Liberal Definition of "Infill": The Council's current interpretation of what constitutes "infill development" is often applied far too strictly, preventing logical and sustainable small-scale development within or on the edge of existing groups of buildings. The new Plan must adopt a more pragmatic and liberal definition, consistent with the NPPF's aim of making the most effective use of land and supporting organic growth in settlements. 7.29. In summary, the new Local Plan must move away from a rigid, "red line" based approach and embrace the flexibility and pro-sustainability ethos of the NPPF. This is essential if the Plan is to provide a positive framework for the housing,	

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		employment, and other development the borough needs to 2042.	
Steven Abbott Associates for Bradkirk Business Park		Allocations are essential outside the existing settlement boundaries. Areas should be identified for development beyond allocations to allow room for growth within and beyond the plan period. This will assist with infrastructure planning	The Plan will adopt a hierarchy of designations on land outside settlement boundaries in Fylde, with the greatest level of protection offered to the Green Belt, followed by Areas of Separation and finally the Countryside. All land outside settlement boundaries in Fylde is within either the Green Belt or the Areas of Separation or the Countryside. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. As the Council has sufficient land to meet its needs that does not lie in the Green Belt, no exceptional circumstances exist to justify a strategic review of the Green Belt in Fylde. Please refer to Strategic Policy DST3: Green Belt for further information. In order to help maintain the openness of areas outside the Green Belt and the identity and distinctiveness of individual settlements, policy DST4 defines Areas of Separation. An Area of Separation is different to Green Belt: it is of a significantly smaller scale and located

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			between settlement boundaries that are relatively close and at risk of merging. The policy has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. Please refer to Strategic Policy DST4: Areas of Separation for further information. Areas outside settlements which are not identified as Green Belt or Areas of Separation are identified as Countryside Areas. In the countryside, Policy DST5 gives a lower standard of protection than Green Belt or Area of Separation policies. The principle is to seek to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. Please refer to Strategic Policy DST5: The Countryside for further information.
United Utilities		U UW welcomes the need to protect the environment. However, we request however	There is a hierarchy of designations on land outside settlement boundaries in Fylde, with the greatest level of protection offered to the Green Belt, followed by

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		that a flexible approach is adopted which ensures that improvements to our essential infrastructure can be delivered where necessary noting that our infrastructure such as wastewater treatment works are often in constrained locations. These improvements are critical to ensure that the impact on the environment is minimised. We have provided additional commentary on this matter in the enclosed supporting information and recommended policies.	Areas of Separation and finally the Countryside. All land outside settlement boundaries in Fylde is within either the Green Belt or the Areas of Separation or the Countryside. Please refer to Strategic Policy DST3: Green Belt, Strategic Policy DST4: Areas of Separation and Strategic Policy DST5 The Countryside for further information. Each of these policies make provisions for development essentially needed for the continuation of an existing enterprise, facility or operation, of a type and scale which would not harm the effectiveness of the gap between settlements and which would not harm the character of the surrounding countryside. Development in the Green Belt will be determined in accordance with the framework. In addition policy IFR1: Service Accessibility and Infrastructure supports local infrastructure works that will benefit the residents, businesses, visitors and/or environment of the Borough of Fylde. This permits a flexible approach that allows for essential infrastructure developments whilst minimising environmental impact.
Woodland Trust	The Woodland Trust supports the retention of the three-tier policies for the protection of open land within Fylde. These designations are essential to prevent uncontrolled development that could damage valuable natural		Comments noted.

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	habitats, woodland, and other ecological assets		

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
Anna Briggs	I'm not sure where to insert these issues as the categories you have used are wide so I'll copy them here and there: -aesthetics: harmonizing store fronts would help keep a certain level of charm. For example in St Annes, some shops just look dire and others beautiful. Maybe unified coloured awnings, plants hanging etc could make a more harmonious effect like in Lytham. More regular scrubbing of the rain protection kiosks and benches would be good as they often get covered in guano. The blue metal structures in St Annes could do well all being painted dark green or brick colour or brown to harmonize with the Victorian brick colour.		Comments noted.

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	-young people bullying, anti-social behaviour, poor mental health: young people often seem hopeless, with issues such as misogynistic behaviour, bullying, depression, vaping addiction, teen pregnancy, body image issues, not wearing bike helmets, and little to do. It is an older population but there truly are too few non-school fun spaces for young people to enjoy in all of Fylde. More CCTV for example in Ashton Gardens and on the beach would help curb anti-social behaviour perhaps. -I would appreciate the monthly market to be weekly, to be able to buy most of my fresh food from local producers and not supermarkets. -pollution on the beaches is INSANE and should not be left to volunteers to take care of. Many jobs could be created to fine and surveil and clean the beaches, as well as educating tourists about pollution. -water quality: I have lived here for a few years and the water has never been sufficient free from sewage to swim in. This is a major drawback to the local community's wellbeing and to tourism. -recycling should be enforced like in Germany. In all the workplaces I've had, no staff member recycled anything and management didn't care.		

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	-many roles locally are in elder care, this is my sector. This is a sector with a huge amount of managerial bullying and exploitation, pressure to not be unionized, ridiculously low pay and pressure to do non-contractual work. The CQC, NHS, unions, council and elder care organizations should be very concerned that our most vulnerable are cared for by understaffed, undertrained, exhausted, undersupported and underpaid people. -lack of knowledge about services: many people here are unaware about what cultural organizations, clubs, churches, libraries, the CAB, volunteering sector, the council etc. has to offer. The social media and newsletters from official channels should highlight these opportunities better. Blackpool council does a very good job at this. -accessibility: too many spaces are inaccessible. As an area with an older and very highly disabled population (the same for our tourists who are often older and disabled), Fylde could be a global model for smart accessible options for all to enjoy the beach, trains, buses, cafes etc. Why should disabled people wait until 9.30am to use their free pass on the bus? Do we not have medical appointments, work, school drop off, shopping to do like anyone else? -hate speech: the local social media is flooded with misinformation, conspiracy and hate speech. It would help for council communication staff to be a part of all local groups and share factual information to avoid this. Again,		

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	the Blackpool MP team does a very good job at social media, communication etc. and could be a model here. -renting: there should be an easier way to rent an apartment and avoid having to pay a deposit when on a low salary or benefits. If not for my relative, I would never have qualified to rent and ended up homeless. Most people can't afford a deposit. -events and art: having an artist in residence programme, who would contribute temporary installations in the squares, cutting-edge events, Q&As with school kids, open air screenings, curated pop-ups etc. would attract a lot of different tourists here and be fun for younger people.		
Bryning with Warton Parish Council	I believe the plan should be reviewed post large developments to ascertain if the current infrastructure is appropriate. Especially when large amounts of family homes are approved. Infrastructure needs to expand to meet the needs of population expansion, this rarely seems to be planned and implemented well leading to delays and frustrations	Yes	Support noted. The Infrastructure Delivery Plan (IDP) is the document detailing the infrastructure required over the Local Plan period. The IDP is a live document that is monitored and refined on a regular basis. Where possible, the IDP outlines delivery partners and funding streams.
Christine Abbott	Infrastructure structure provision should be dictated by the local council and not the Secretary of State. If infrastructure planning is submitted in an inappropriate place the Plan	Yes.	Comments noted. Development on the Green Belt will be determined in accordance with national policy.

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	should not be accepted for consideration. Infrastructure should NOT be planned on farmland, greenbelt etc.		
David Chedd		Yes	Support noted.
Emma Swindells	Poorly maintained roads, which are gridlocked, have issues with surface flooding. No colleges in the borough. Travelling around the borough isn't pleasant anymore as so busy	Yes but more needs to be done before anything else is built	Comments noted.
Frank Andrews		yes	Support noted.
Gerard Malone	We need more medical centres, schools (including sixth form!!!), nhs dentists. Maybe also childcare /	Yes	Support noted, the individual items of infrastructure required to support the Local Plan are detailed in the Infrastructure Delivery Plan (IDP).
Irene Jacques	Open spaces, parks, sports pitches, libraries, sports centres, pools are all vital for our area.	Yes in general, however, lots more tree planting should be a condition for any developer of new road or housing development. More trees would not only look great but help to combat climate change.	Comments noted.
John Leadbeater	Not at present	Yes	Support noted.
John Maskell	In general, infrastructure provision is not keeping up with housing development. Roads, drainage, sewers, water	Yes	Comments noted.

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	supply, transport has not been improved commensurate with housing development.		
Keith Gorton	In terms of infrastructure planning, the cart invariably comes before the horse. Housing developers should be contracted to make at least a substantial start on essential infrastructure BEFORE a brick is laid on the first house. Otherwise, experience shows that needs in the main areas of public concern, i.e. health, education, roads, etc. are seldom met. This requires forward planning to identify a suitable location for a new health centre, school or school extension, relief road, etc. Joined-up thinking, often all too sadly lacking, is a prerequisite. Of course one recognises that there are constraints from governments which seek more authoritarian and centralised rather than devolved control, but perhaps a longer-term view should be taken: governments do not go on for ever, unlike some planning applications seem to do. There are lessons to be learned here.		It is difficult to secure infrastructure and financial contributions prior to development commencing as funds are normally provided through the sale of dwellings and/or development following completion. It is common practice for contributions to be provided incrementally at agreed instalments known as 'trigger points' as a development progresses, where the sale of dwellings fund the required infrastructure.
Keith McKay	MUCH of the existing infrastructure is reaching the end of its life and requires renewal or replacement. For areas of new development, it is particularly important to ensure that the infrastructure can be extended properly as a pre-condition.	Requires to be more analytical and then definite and specific as to defining the needs in different categories.	The specific details of infrastructure to be delivered across the plan period is outlined in the Infrastructure Delivery Plan (IDP). The IDP is a live document that is monitored and refined on a regular basis and, where possible, it outlines delivery partners and funding streams.

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Linda Nulty	Infrastructure provision has been very poor. It has never been provided in advance of development and often not even followed development. The road network is at breaking point especially around Kirkham and Wesham and the M55 junction 3. The St Annes link road and new M55 junction 2 were supposed to help to relieve congestion on A585 and junction 3 but it remains the same. The state of the highways in all areas of Fylde is poor , if not very poor. Water and sewerage systems are overloaded. Health centres, GP surgeries in Kirkham and Rural Fylde are massively oversubscribed, dental services only available in LSA. Internet and Broadband coverage is sporadic to non existant in Kirkham and surrounding areas Swimming Baths, young peoples services do not exist particularly outside LSA which is not easily accessible to the rural areas	Demands and requirements made on developers MUST be followed up and enforced as necessary. Section 106 or 278 requirements must be logical. Short lengths of cycleways for instance help nobody. Connectivity must mean just that, there must be safe crossing schemes across main busy roads when new developments are approved and they must be in advance or at the same time - not several years after developments are finished.	It is difficult to secure infrastructure and financial contributions prior to development commencing as funds are normally provided through the sale of dwellings and/or development following completion. It is common practice for contributions to be provided incrementally at agreed instalments known as 'trigger points' as a development progresses, where the sale of dwellings fund the required infrastructure. Highways improvement measures at the A585 and M55 Junction 3 are supported in policy IFR4 and development that will compromise the delivery of these schemes will not be permitted.
Lytham St Annes Civic Society	Whitehills and Whyndyke will require planned facilities. In the interests of community cohesion certain institutions should be actively supported such as the Ansdell and Lytham Institutes. To see them thriving, alongside sports activities and cultural events would contribute to the prosperity of the town centres. If the council is not		Whyndyke and Whitehills are identified as strategic locations for growth in Local Plan policy SLD2. The Local Plan acknowledges that each area will require dedicated infrastructure, including the new provision of local services and facilities, and reflects this in the supporting text for the individual

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	providing an art gallery or museum then it should support voluntary groups and charities which do so.		site allocations. Furthermore, Policy IFR2: Developer Contributions details that developer contributions may be directed to the development of Whyndyke and Whitehills and Warton to develop these areas as local centres to provide services and meet the daily retail needs of residents. Community facilities are identified as infrastructure in which developer contributions can be directed. Policy IFR2 details that developer contributions may be required for Community facilities providing for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. By extension this would include art galleries, museums.
Marcus Dowling	No	Yes	Support noted.
P Stanford	Not sure why FBC don't have a Community Infrastructure Levy. Think Blackpool and Preston do it ? Are you missing a trick to get more in .. to benefit the area / residents ? S106 monies process need to be clearer, open and up to date for public viewing ie – most upto date position visible via web site – rather than 6 month / 12 month view via a committee report	No – you are not tough enough in DEMANDING improvements. You need to make it clear that in Fylde, ALL improvements are DELIVERED BEFORE any developments start.	The approach to developer contributions is detailed in policy IFR2: Developer Contributions that details the types of infrastructure in which developer contributions will be directed towards. Contributions are to mitigate the impact of development on local infrastructure and

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	S106 monies should be sought for ALL sites. You need to be firmer and more demanding. The issue of planting trees is an easy tick box for planning/ new development – but the ongoing management in 10 / 15 years time is VERY VERY expensive for you. New / upgraded infrastructure has become a joke. Planning is agreed and infrastructure NEVER arrives. Eg – crossing/underpass A585 at Ribby roundabout for . think we are 6 /. 10 years on now . Flooding .. residents know best where floods – STOP agreeing with planning calculations, predictions and waffle that's just produced to get approval. In K&W ALL the most recent sites that have been developed have has flooding issues. We the long standing residents knew they would flood ! K&W needs an NHS dentist surgery NOW .. not next year or in 10 years time. People are being FORCED to go down the private route .. and those that don't suffer leading to more issues down the line for their health. There is NOT ENOUGH for the “youth” to do – LCC have pulled almost ALL funding – and are surprised there are antisocial issues ! Rather than wasting all that money on Kirkham market		any contributions sought will take viability into consideration. It is difficult to secure infrastructure and financial contributions prior to development commencing as funds are normally provided through the sale of dwellings and/or development following completion. It is common practice for contributions to be provided incrementally at agreed instalments known as ‘trigger points’ as a development progresses, where the sale of dwellings fund the required infrastructure. The Infrastructure Delivery Plan (IDP) document identifies the infrastructure needed to support the Local Plan and is monitored and refined on a regular basis. Where possible, the IDP outlines delivery partners and funding streams.

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	square (including the Hillside and ex Llyod's buildings) and now the St Annes scheme – just imagine what an amazing project that would have provided for the kids ! Government and FBC have failed to prioritise ! I've just read this week that FBC have agreed £1.5m for the improvements to about 120m of Garden Street in St Annes - WTF – what the hell is going on ! There was NOTHING wrong with that Steet before the development of JR Taylor started ! Someone's having a laugh ! K&W has been promised a new health centre for almost 10 years – the land is there – it needs pressure from FBC to the ICB to deliver – or they will drag their feet for ever. Wesham Ambulance station closed ! – not a great move ! Did FBC fight that closure ?		
Stephen and Jacqueline Croft	Routine maintenance seems to have lapsed compared to previous decades	The issues are identified ... the matter is larger priority and finance	Comments noted.
Theatres Trust	We agree that cultural and leisure facilities including performance venues constitute infrastructure which supports the needs of local people. They contribute towards social and cultural well-being, providing opportunities for engagement and participation in cultural activities.	On the basis of the above, we support the general direction although to support existing facilities we urge inclusion of robust policies which guard against	Support noted. The loss of community facilities is addressed in policy ENT5: Loss of Community, Leisure and Cultural Facilities and Services. This details that any losses will be resisted unless it can be demonstrated that the facility is no longer needed. This must be demonstrated

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
		loss in line with paragraph 98 of the NPPF (2024).	through the marketing of the premises in its current operational form in accordance with policy ECD10.
Avison Young for National Gas	National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets. Gas assets High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines. National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement. National Gas Transmission's 'Guidelines when working near National Gas Transmission assets' can be downloaded here: https://www.nationalgas.com/document/82951/download		Comments noted. Policy IFR3: Protection of Strategic National Infrastructure details that development and mitigation measures for development will not be permitted where it prejudices the safety of or restrict the operation of specific national infrastructure. This explicitly lists National Gas pipelines as infrastructure to be protected. The Local Plan acknowledges National Gas easement rights that prevent building and a 12.2m building proximity distance in which consent is required.
Blackpool Council	Infrastructure / Transport - Blackpool Council welcomes reference to the South Fylde Line frequency uplift, the T5 Link Road, and junction capacity assessments. These have		Support noted. Fylde Council recognises the cross-boundary impacts of development and is committed to engaging

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	notable implications for the Fylde Coast's travel-to-work area, labour market access and carbon reduction objectives. We note the recognition that there will be a need to investigate the impacts of new developments planned for up to 2042 on the likely usage of both M55 Junctions 3 and 4 which will identify a programme of measures that will be needed. We would like to add that there will also be likely impacts on Blackpool's highway network and welcome continued collaboration to understand these impacts. Whyndyke Farm - Blackpool Council recognises the importance of Whyndyke Farm as one of Fylde's strategic housing sites. Although it is acknowledged that the intention is for Whyndyke to be as self-sufficient as possible, there will inevitably be impacts on Blackpool's health, education and community infrastructure which we consider should be assessed as part of any future Infrastructure Delivery Plan. We strongly support the recognised need to ensure a cross-boundary approach to the development of infrastructure to support Whyndyke and wider areas. We welcome and strongly support the acknowledgement that Preston New Road is a physical barrier to movement between the areas and that this can be overcome through effective provision of crossings and traffic management and the need to ensure infrastructure to provide for walking, cycling and public transport to nearby facilities within Blackpool.		with Blackpool Council at the planning application stage.

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	Whitehills - The document highlights the lack of facilities that have come forward from the Whitehills development and how this leads to car dependence. Continuing to improve facilities for walking, cycling and public transport in the area are key as the development continues to expand.		
Defence infrastructure Organisation	Defence is one of the 13 national infrastructures sectors defined as Critical National Infrastructure whose facilities, systems, sites, information, people, network and processes, are necessary for the country to function and upon which daily life depends. Weeton Barracks and MOD Inskip should be recognised within the Plan as infrastructure provision.		Proposals affecting strategic national infrastructure including MOD Inskip and MOD Weeton Barracks, are covered in policy IFR3: Protection of Strategic National Infrastructure. This refuses planning permission for development affecting strategic national infrastructure, including the two MOD sites, and details that operators and regulators of these sites will be consulted on any relevant development proposals.
Historic England	Historic England would support the option for infrastructure provision which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP	Heritage should be included in the list.	Comments noted, it is a statutory requirement for Historic England to be consulted on planning applications affecting Grade I or Grade II* listed buildings, registered parks and gardens or any registered battlefield. Historic England is a specific consultation body when consulting on Local Plans and development plan documents and strategic planning allocations.

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Home Builders Federation		Policy Issues: Infrastructure 31. In progressing its new Local Plan, the Council will need to produce its own Infrastructure Delivery Plan (IDP) which can establish the infrastructure which is needed to deliver the allocations in the plan and provide a cost for these. The HBF considers that this is important in ensuring transparency in showing how housing growth can support infrastructure provision. To provide as much clarity as possible, the IDP should be produced early on and then updated throughout the plan-making process. 32. The HBF also believes that the IDP should form a key part of the whole-plan viability assessment to demonstrate that the	The IDP document identifies the infrastructure needed to support the Local Plan and is monitored and refined on a regular basis. Where possible, the IDP outlines delivery partners and funding streams. The Local Plan and policies contained within have been viability tested and contributions are sought from development only where the impact is directly related to the development. Where planning obligations render a development unviable the council will have regard to appropriate evidence submitted by the applicant and will consider any flexibility that can be accommodated with regards to the contributions sought. The Council recognises the tests involved in seeking developer contributions to mitigate the impacts of development. Developer contributions will be sought where there is a clear and demonstrable link between the impacts of a development and the need for additional infrastructure.

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
		provision of such infrastructure does not threaten the deliverability of the proposed allocations in the Local Plan 33. It is noted by the HBF that paragraph 7.4 of the consultation document states: "The existing Local Plan contains policies to require provision of infrastructure to the site, or where infrastructure will be provided off-site, to require developer contributions to ensure its provision. The Council considers such policies will be needed going forward. Infrastructure or developer contributions can only be required where directly related to the development." 34. As outlined above, such developer contributions	

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		should be included in the whole-plan viability assessment. Whilst it is noted that the Council has stated that it will only require developer contributions where directly related to the development, this needs to go further and reference the statutory tests found in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and replicated in paragraph 58 of the NPPF, in that all developer contributions should be: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development.	

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
Lichfields for Taylor Wimpey	7. Policy Issues: Infrastructure Requirements for developer contributions must be prepared in accordance with Regulation 122(2) of the Community Infrastructure Levy Regulations and NPPF Paragraph 58 which states that: ‘Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development’ Viability also remains a key consideration and the Council must ensure that developer contributions do not render development of key housing development unviable.	7. Policy Issues: Infrastructure Requirements for developer contributions must be prepared in accordance with Regulation 122(2) of the Community Infrastructure Levy Regulations and NPPF Paragraph 58 which states that: ‘Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development’	The Council recognises the tests involved in seeking developer contributions to mitigate the impacts of development. The Council will take viability into consideration where should a development be made unviable by the requirements of a planning obligation, the Council will have regard to appropriate evidence submitted by an applicant and consider whether any flexibility in the planning obligation is justified (Policy IFR2).

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		Viability also remains a key consideration and the Council must ensure that developer contributions do not render development of key housing development unviable.	
National Highways	Q47. WSP note that the draft LP document recognises that physical and social infrastructure required to support development. The inclusion of transport infrastructure is particularly supported, and emphasis should be given to the promotion of green infrastructure (footways, cycleways, etc.)	Q48. WSP recommend that the general approach to infrastructure is supported and developed further as the LP develops to ensure that priority is given to blue and green infrastructure to promote active travel and sustainable modes of transport as the primary choice. It is acknowledged that the draft LP supports the proposal to engage with statutory providers and production of an Infrastructure Delivery Plan. It will be important for the Infrastructure Delivery Plan to assess the cumulative	Comments noted, National Highways is a statutory consultee and is a specific consultation body when consulting on Local Plans and development plan documents and strategic planning allocations. Under policy IFR4: Transport Infrastructure Projects, the council will support measures to improve the A585 and M55 junction 3 and delivery of the T5 Link Road on the strategic road network. Development that would compromise the delivery of these schemes will not be permitted.

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		impact of development on the SRN, especially around M55 Junctions 3 and 4, and to identify any shortfalls or mitigation measures needed. This will be essential to identifying transport-related needs and ensuring that strategic sites are supported by appropriate infrastructure. WSP suggest that National Highways are engaged as early as possible and regularly in the plan making process, in accordance with National Highways guidance, particularly with reference to the Infrastructure Delivery Plan.	
NHS Property Services	General Comments on Health Infrastructure to Support Housing Growth The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the		Comments noted, NHS England and NHS Lancashire and South Cumbria Integrated Care Board (ICB) are statutory consultees and specific consultation bodies when consulting on Local Plans and development plan documents and strategic planning allocations.

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
	system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area. Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation. Infrastructure Delivery and Developer Contributions As set out above, given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be at the forefront of priorities for infrastructure delivery. Health infrastructure should be		Local Plan Policy IFR2: Developer Contributions, details the types of infrastructure in which developer contributions will be used to fund. This includes community facilities providing for the health and wellbeing needs of the community. The policy details that in some cases developers may provide infrastructure directly as opposed to developer contributions, however any infrastructure must be directly related to mitigating the impacts of development and insofar should not jeopardise the viability of the development in coming forward. The IDP document identifies the infrastructure needed to support the Local Plan and is monitored and refined on a regular basis. Where possible, the IDP outlines delivery partners and funding streams.

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	clearly identified in the Local Plan as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan. We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth across the Local Plan area. NHSPS recommend that the Local Plan have a specific section in the document that sets out the process to determine the appropriate form of developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements. The Local Plan should emphasise that the NHS and its		

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	partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. As a starting point, we suggest the following process: • Assess the level and type of demand generated by the proposal. • Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality. • Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery. • Identify the appropriate form of developer contributions. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services.		

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
	Options should enable financial contributions, new-on-site healthcare infrastructure, free land/ infrastructure /property, or a combination of these.		
Pegasus Group for Rowland Homes	6.3. Any improvements need to be evidenced in an Infrastructure Delivery Plan (IDP), which needs to be prepared to support the Plan. The IDP should be a 'live document' and monitored to ensure that infrastructure is delivered alongside development. Until this evidence is prepared, Rowland Homes reserves the right to make further comments. 6.4. It is also important that any infrastructure/developer contributions are also appropriately allowed for, and duly considered, in respect of viability testing. The local plan must be supported by a robust evidence base – including a Viability Assessment at the early stages of the plan making process. 6.5. Any developer contributions must also meet the planning obligation tests set out at NPPF paragraph 58: a) Necessary to make the development acceptable in planning terms; b) Directly related to the development; and c) Fairly and reasonably related in scale and kind to the development.	6.1. Rowland Homes wish to express their support for the need to deliver development in smaller settlements where it is demonstrated they can support growth – i.e. development which can be sustainably supported by existing services and infrastructure or, in combination with other developments proposed, provide for the facilities and services necessary. Indeed, this is supported by NPPF paragraph 83, which under the subtitle rural housing states: "To promote sustainable development in rural areas, housing should be located where it will	The Infrastructure Delivery Plan (IDP) is the document detailing the infrastructure required over the Local Plan period. The IDP is a live document that is monitored and refined on a regular basis. Where possible, the IDP outlines delivery partners and funding streams. The Local Plan and policies contained within have been viability tested and contributions are sought from development only where the impact is directly related to the development. Where planning obligations render a development unviable the council will have regard to appropriate evidence submitted by the applicant and will consider any flexibility that can be accommodated with regards to the contributions sought. The Council recognises the tests involved in seeking developer contributions to mitigate the impacts of development. Whilst the Council has set some housing allocations in the smaller settlements, the majority of allocated sites are located in

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		enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services” 6.2. Therefore, there is a need to allocate suitable sites in smaller settlements, which respect existing character and at the same time do not exceed the capacity of existing services and infrastructure, or seek to improve them to mitigate against the impacts of development	the larger settlements in the strategic locations. This is in accordance with the development strategy whereby larger settlements in the strategic locations are the most sustainable locations.
PWA Planning for Medicom	8.1. The timely and coordinated delivery of infrastructure is fundamental to creating successful, sustainable communities. A key objective of the National Planning Policy Framework (NPPF) is to actively manage patterns of growth to support sustainable transport and focus development in sustainable locations. The site at School Farm is uniquely positioned to deliver on this objective.		Support noted.

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	General Infrastructure Provision 8.2. We support the Council's general approach to infrastructure planning through an Infrastructure Delivery Plan (IDP) and the principle that development should contribute towards necessary infrastructure, subject to viability. 8.3. The School Farm site represents a highly efficient location for growth. As a logical extension to the existing settlement of Warton, new development here can connect to and utilise existing utility and social infrastructure networks far more effectively and with less environmental impact than development in a more remote or isolated location. This makes it a cost-effective and sustainable choice for delivering new homes.		
PWA Planning for Pringle Homes	8.1. The timely and coordinated delivery of infrastructure is fundamental to creating the successful, sustainable communities that Pringle Homes is committed to building. We support a proactive approach to infrastructure planning that enables, rather than constrains, the delivery of high-quality housing. 8.2. General Infrastructure Provision 8.3. Pringle Homes supports the Council's general approach to infrastructure planning through an Infrastructure Delivery Plan (IDP) and the principle that development should contribute to necessary infrastructure. Our proposal for Greenlands Farm is a clear demonstration of this commitment. The landscape-led concept has been	Transport and the Sustainability of Greenlands Farm 8.4. We support the Council's strategic transport priorities, such as improving rail services and junction capacity. A key objective of the new Local Plan must be to allocate sites that are in inherently sustainable locations, thereby maximising the use of	Sites submitted as part of the call for sites have been evaluated and screened out in the Strategic Housing and Economic Land Availability Assessment (SHELAA).

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
	designed from the outset to deliver significant on-site green and blue infrastructure, including: • Substantial Public Open Space, incorporating a new community sports and games field. • Multiple new ponds and sustainable drainage systems (SuDS), which will manage surface water effectively and enhance biodiversity. • By integrating this infrastructure into the scheme, the development will not only meet its own needs but also provide valuable new amenities for the wider Wrea Green community. In line with paragraph 35 of the National Planning Policy Framework (NPPF), it is essential that all policies for developer contributions are informed by robust viability evidence to ensure they do not "undermine the deliverability of the plan".	existing infrastructure and minimising the need for new car-dependent journeys.	
PWA Planning	8.1. The timely and coordinated delivery of infrastructure is fundamental to the successful implementation of the Local Plan. It is the critical enabler for the sustainable growth that the borough needs, unlocking sites for new homes and businesses and ensuring that new and existing communities are well-served.	8.3. We support the Council's general approach to infrastructure planning. The commitment to work with utility providers and other stakeholders to prepare a comprehensive Infrastructure Delivery Plan (IDP) is the correct and	Support noted. The IDP document identifies the infrastructure needed to support the Local Plan and is monitored and refined on a regular basis. Where possible, the IDP outlines delivery partners and funding streams. The Local Plan and policies contained within have been viability tested and

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		most effective mechanism for identifying needs, costs, and delivery partners. 8.4. We agree that the IDP must be a 'live' document, subject to regular monitoring and review to ensure it remains responsive to the pace of development and changing priorities. Effective collaboration between the Council, infrastructure providers, and the development industry will be essential to ensure that the infrastructure required to support the Plan's growth strategy is deliverable. 8.5. In line with paragraph 35 of the NPPF, it is essential that policies for developer contributions, whether through Section 106 agreements or a future Community Infrastructure Levy (CIL),	contributions are sought from development only where the impact is directly related to the development. Where planning obligations render a development unviable the council will have regard to appropriate evidence submitted by the applicant and will consider any flexibility that can be accommodated with regards to the contributions sought.

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		are informed by robust viability evidence to ensure they do not "undermine the deliverability of the plan".	
S&L for River Properties	With reference to the types of infrastructure listed in the consultation, there is a need for the following in Fylde and there is interest from investors and operators for facilities especially in the St Annes and Lytham area: Leisure / health and fitness: The Council may be aware that a premium-brand national operator has a longstanding requirement for a sizeable facility in the St Annes and Lytham area which is cable of accommodating a gym, fitness studios, spa, indoor and outdoor racquets courts and swimming pools. The operator has been searching for several years but has been unable to find a suitable site. Green infrastructure: It is understood that there is limited remaining capacity for burials and remembrance memorials at Lytham Park Cemetery and Crematorium. There is also the opportunity to identify land which is suitable for local BNG habitat provision to facilitate the level of housing growth to be accommodated in the plan period to 2042. Information technology: It is understood that there is demand for a data centre/s to serve the St Annes and Lytham area. Energy generation: There is a need for all types of renewable energy and off-line storage		The infrastructure required to support the local plan to 2042 will be based on identified need following conversations with statutory providers. Infrastructure requirements will be detailed in the Infrastructure Delivery Plan.

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	systems. There is interest from renewable energy developers and operators for PV solar farm development and associated or standalone battery energy storage system (BESS) facilities, and these can be developed on land within zone 2 and 3 flood risk areas. Suitable land is available to accommodate these types of infrastructure on our client's site identified as Site H3 - Land North of Moss Hall Lane in the Preferred Options version of the Part 1 Fylde Local Plan to 2032 which was published for consultation between June and August 2013, and the adjoining land to the north and land to east. These areas of land were submitted in the Call for Sites in June 2025 in three parts as 'Land east of Lytham St Annes Way (B5410), Lytham St Annes', 'Land north of Linnet Lane, Lytham St Annes' and 'Land north of Park Cemetery, Regent Avenue, Lytham St Annes'. It is acknowledged that the latter site is within the boundary of the Lytham Hall Registered Park and Garden of Special Historic Interest but open land use/s such as green infrastructure will not conflict with its heritage significance and designation.		
Sport England	The reference in paragraph 7.1 of the consultation document to green infrastructure (including sports pitches and courts) and sports & fitness centres, swimming pools and stadiums forming part of the infrastructure required by the Borough to be secured to support development in the Local Plan is welcomed. However, as set out above in		The council recognises that, in the event that it considered it necessary to require contributions from developers for sports infrastructure that supporting evidence would be required.

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	response to questions 39 & 40, to identify the community sports infrastructure required to support the new Local Plan an up-to-date assessment of needs will be required as advised in paragraph 103 of the NPPF. This assessment will need to be prepared or commissioned by the Council as utility providers will not be able to provide such information for community sports facilities.		
Steven Abbott Associates for Bradkirk Business Park	Realistic allocations for the main land uses will help infrastructure planning. Strategic infrastructure e.g. motorway junction improvements require a public sector planning commitment and should not be imposed on individual developers to resolve.		Comments noted.
United Utilities	In response to this question we refer you to the supporting enclosure, in particular, those sections under the headings 'Investment in Future Infrastructure' and 'Co-ordinated Infrastructure Provision'. These sections address the need for support for investment in key infrastructure such as water and wastewater services. As noted above, it explains that such facilities are often in constrained locations. It also explains that it may be necessary to co-ordinate the delivery of development with the delivery of new infrastructure, which should be addressed in a specific policy in the local plan. Investment in Future Infrastructure	In accordance with our above comments, we request that the Council refers to the supporting information and recommended policies from UUW relating to water and wastewater matters. Co-ordinated Infrastructure Provision We wish to note that any growth needs to be carefully planned to ensure	Comments noted, policy IFR1: Service Accessibility and Infrastructure supports development proposals for local infrastructure that would benefit the residents, businesses, visitors and/or environment of the Borough of Fylde.

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	Investment associated with our water and wastewater infrastructure is influenced by a number of drivers including the construction of new facilities to take account of new environmental requirements, growth, the need to respond to the carbon challenge, or the need to invest in new updated infrastructure. In our current investment period (2025-30), we are proposing the biggest investment in water and wastewater services across the North West in over 100 years. The total expenditure by U UW for the period 2025-2030 is approximately £13 billion. This includes various enhancements and improvements to infrastructure, resilience, and environmental standards The drivers for investment include the Environment Act 2021, which has set a requirement to progressively reduce storm spills into the environment. Such investment will be constrained by engineering circumstances to determine the most appropriate location for additional storage to reduce spills. This may necessitate investment in constrained locations in our urban and rural environments such as in/on land in protected locations (green belt, local green space and open countryside). Consistent with meeting this obligation, U UW requests that the future local plan includes support for investment in water and wastewater infrastructure that is ultimately beneficial to the environment, biodiversity and our watercourses so it can be delivered in the most timely and effective manner. Specifically, we request that policy supports investment in	new infrastructure provision does not cause any unexpected delays to development delivery. The full detail of the development proposals are not yet known. For example, the detail of the drainage proposals, the points of connection or the water supply requirements. As a result, it is important that we highlight that in the absence of such detail, we cannot fully conclude the impact on our infrastructure over a number of 5-year investment periods and therefore as more detail becomes available, it may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure.	

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	our infrastructure in constrained locations such as local green space, open countryside and green belt. With regard to sites which may be situated in the Green Belt, National policy within the NPPF allows for: •the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; •limited infilling or the partial or complete redevelopment of previously developed land (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the green belt; and •the development of grey belt land. On this basis, National Policy is broadly supportive of investment at existing operational sites in the Green Belt. However, we ask for this to be specifically referred to in your future planning policies. U UW requests the Council's support for investment in infrastructure in order to be able to expeditiously respond to the needs of the borough. The following policy wording is recommended: Recommended Policy The Council will support water and wastewater infrastructure investment including development proposals	Once more information is available with respect to specific development sites, which is often only at the planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for the delivery of infrastructure improvements. We recommend that you include a development management policy in your draft plan to this effect. Our recommended policy is below. Recommended Policy Once more details are known on development sites, it may be necessary to coordinate the delivery of development with timing for the delivery of	

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	for water and wastewater infrastructure in protected areas such as the Green Belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs. Explanatory Text Infrastructure is key to the delivery of sustainable development, economic growth and environmental improvement. The council will support infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives by water and sewerage providers. In relation to existing water and wastewater infrastructure sites, we request that these are identified on your proposals map and covered by the following policy. Recommended Policy Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs. We can provide plans of sites which are located in open countryside / green belt by separate cover. We request that such sites are specifically identified on the proposals map where investment in future water and wastewater needs would be acceptable.	infrastructure improvements.	

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	These policies would enable us to ensure we can continue to meet the growth and development aspirations of the borough, and current / future environmental drivers. Our Assets It is important to outline to the local planning authority (LPA) the need for our assets to be fully considered in development proposals. We will not permit development over or in close proximity to our assets. Our assets will need to be afforded access for maintenance, repair and replacement and be fully considered in the design and masterplanning process for a site. This should include careful consideration of landscaping proposals in the vicinity of our assets and any changes in levels. We strongly recommend that the LPA advises future applicants of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask site promoters to contact UUW to understand any implications using the above contact details.		

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	Please note: - U UW will not allow building over or in close proximity to a water main. - U UW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances. - Site promoters should not assume that our assets can be diverted. - On occasion, an asset protection matter within a site can preclude delivery. Development next to Water and Wastewater Treatment Works, Wastewater Tanks, Pumping Stations, Overflows and Other Wastewater Assets During the site-selection process, we would urge you to carefully consider our existing treatment works, pumping stations and other assets. It is important to explain that: 1. Treatment works are key infrastructure for the borough which may need to expand in the future to meet growth needs or respond to new environmental drivers. Maintaining a space around a treatment works is therefore desirable to respond to any future investment requirements.		

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
	2. As a waste management facility, a wastewater treatment works is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. A wastewater treatment works is also subject to vehicle movements from large tankers which need to access the site. 3. Water and wastewater treatment works can include the storage or processing of hazardous materials such as biogas or chlorine, where there may be safety concerns. The position of UUW is that when considering a range of sites to meet development needs, it would be more appropriate to identify new development sites, especially sensitive uses, such as housing, which are not close to a treatment works, where amenity could be a concern, or where there are process issues which could represent a safety risk. This position is in line with the 'agent of change' principle set out at paragraph 200 of the NPPF. Paragraph 200 states: 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development		

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
	permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.' Paragraph: 009 Reference ID: 30-009-20190722 of the NPPG expands on this by stating: Development proposed in the vicinity of existing businesses, community facilities or other activities may need to put suitable mitigation measures in place to avoid those activities having a significant adverse effect on residents or users of the proposed scheme. In these circumstances the applicant (or 'agent of change') will need to clearly identify the effects of existing businesses that may cause a nuisance (including noise, but also dust, odours, vibration and other sources of pollution) and the likelihood that they could have a significant adverse effect on new residents/users. In doing so, the agent of change will need to take into account not only the current activities that may cause a nuisance, but also those activities that businesses or other facilities are permitted to carry out, even if they are not occurring at the time of the application being made.		

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
	The agent of change will also need to define clearly the mitigation being proposed to address any potential significant adverse effects that are identified. Adopting this approach may not prevent all complaints from the new residents/users about noise or other effects, but can help to achieve a satisfactory living or working environment, and help to mitigate the risk of a statutory nuisance being found if the new development is used as designed (for example, keeping windows closed and using alternative ventilation systems when the noise or other effects are occurring). It can be helpful for developers to provide information to prospective purchasers or occupants about mitigation measures that have been put in place, to raise awareness and reduce the risk of post-purchase/occupancy complaints. Similarly Paragraph: 005 Reference ID: 34-005-20140306 of the NPPG states: Plan-making may need to consider:		

Respondent name	(47) Do you have any general comments about infrastructure provision?	(48) Do you support the Council's general approach to the requirement for infrastructure?	Council Response
	whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern). On the basis of the above, we wish to recommend the following policy for inclusion in any new local plan. Recommended Policy New development must ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and safety and will not be adversely affected by nearby uses and vice versa. When applicable, applicants will be required to submit the relevant impact assessments, outlining any adverse effects from the nearby site, and any required mitigation. We also request the opportunity to liaise closely with the Council on potential site allocations so we can advise you of any concerns associated with proximity to such wastewater assets. UUW wishes to emphasise its strong preference to avoid development in the vicinity of such assets. We can provide plans of our wastewater treatment works by separate cover.		

Respondent name	(49) Are there further transport schemes that should be investigated in order to support the Local Plan?	(50) Do you have further comments on the provision of infrastructure and transport?	Council Response
Anna Briggs	All transport should be accessible, at all times of day.		Comments noted.
Bryning with Warton Parish Council	Yes, Linking up trains from either Lytham or Kirkam into the villages	The transport links (B Roads) linking up the village are problematic when the major roads have roadworks/temporary utility lights which is every other month as the norm in Warton/Freckleton. Bryning lane is always a cut through and in places single track road. This could be a bypass in support of traffic flow and safety.	Comments noted. Policy IFR5: Enhancing Sustainable Transport Choice requires developers to contribute to the improvement of public transport between the location of the site and nearby town centres, hospitals, railway stations and employment areas where the existing provision is sub-standard or requires further support to continue.

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Christine Abbott	No	The Fylde has recently seen an increase in solar/wind farm applications. Even though the Council will aim to protect it's Green Belt etc. 'exceptional circumstances' appear to hold favour with the Govt and it will be overruled. Mitigation seems to be a way for developers to have free reign on their Plans.	Comments noted. Development on the Green Belt will be determined in accordance with national policy.
Ethan Ellison	Increasing the railway frequency and services and investigate potential new stations. Can these sites then be prioritised for development? Can the tram be extended to unlock potential development east of the airport?		The Council is seeking to improve service frequency on the South Fylde railway line. This is reflected in policy IFR4: Transport Infrastructure projects that advocates support for projects and contributions towards improvements to the South Fylde Railway line to double the service frequency. A scheme for a passing loop to enhance capacity has been developed and a strategic business case was submitted to the government in 2024. Developer contributions directed towards the tram network are also supported (see policy IFR2).
Gerard Malone	Oh yes! Sort the south Fylde line out!! Get the passing loop implemented. Also a bus route closer to new housing estates!	New road is excellent. Let's expand on it	Comments noted, the council is seeking to improve the service frequency along the South Fylde rail line. A scheme for a provision of a passing loop has been developed as

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			part of the improvements to increase the frequency and capacity of railway services on the South Fylde rail line. A strategic business case was submitted to the Government in 2024. The delivery of improvements to the South Fylde railway line to double the service frequency are supported under policy IFR4: Transport Infrastructure Projects. Policy IFR1 also encourages development proposals to demonstrate how access to services will be achieved without car use and lists bus, tram and rail infrastructure as possible recipients of developer contributions under IFR2.
Irene Jacques	It would be amazing if the tramway could be extended from Squires Gate to St Annes!	A passing loop to allow more trains is vital. The old trains in use are way past their best, and need upgrading, these trains are ancient when compared to trains in the South East of England. It's vital too that town squares, promenades and coastal defences are all maintained to a high standard.	Comments noted, the Local Plan refers to a passing loop as part of the improvements to increase the frequency and capacity of railway services on the South Fylde rail line. The delivery of improvements to the South Fylde railway line to double the service frequency are supported under policy IFR4: Transport Infrastructure Projects. A strategic business case was submitted to the Government in 2024.

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			Policy IFR2 makes reference to tram infrastructure as a type of infrastructure in which developer contributions may be sought towards.
John Leadbeater	No more roads please.	Not at present	Comments noted.
John Maskell	A railway halt in Wrea Green		Comments noted.
Keith McKay	Currently, public transport is not well supported - it's not attractive nor is it convenient, especially with restricted operating hours, which goes with the lack of use. I suspect there is no easy solution as everyone is used to the convenience of their own transport.		Comments noted. It is recognised that the frequency of public transport could be improved where the local plan seeks to double the service frequency of the South Fylde railway line for example (Policy IFR4: Transport Infrastructure projects). The Local Plan details that a scheme for the provision of a passing loop to enhance capacity has been developed and that a strategic business case was submitted to the government in 2024.
Linda Nulty	Traffic light re-instatement at M55 junction 3 is essential before any more development is even considered in the Kirkham and Wesham area	It is stated that the link road and junction 2 of M55 have resulted "in significant reduction in journey times" I would like to see proof of that - and reduction of queueing to M55 junction 3. Bus service improvements would be great	The Council is investigating the impacts of new development to 2042 on the likely usage of the M55 junction 3. Under policy IFR4 the council will support measures to improve the M55 junction 3 and the A585.

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			Regarding bus service improvements policy IFR5: Ensuring Sustainable Transport Choice, requires developments to encourage alternative means of transport to improve accessibility, safety and quality of life for residents. The Council will work with neighbouring authorities and transport providers to help achieve this. Policy IFR1 also encourages development proposals to demonstrate how access to services will be achieved without car use and lists bus, tram and rail infrastructure as possible recipients of developer contributions under IFR2.
Lytham St Annes Civic Society	Passing loops should be considered to increase the frequency of the trains. Park and ride schemes should be considered on event days.	The new Heyhouses to M55 link road has made the junction of Woodlands Road and Blackpool Road very difficult. Traffic lights and roundabouts need to be reviewed throughout the borough.	Comments noted, policy IFR4: Transport Infrastructure Projects details the schemes within the borough that the council will support. This includes improvements to the South Fylde railway line to double the service frequency. The Local Plan details that a scheme for the provision of a passing loop to enhance capacity has been developed and that a

Respondent name	(49) Are there further transport schemes that should be investigated in order to support the Local Plan?	(50) Do you have further comments on the provision of infrastructure and transport?	Council Response
			strategic business case was submitted to the government in 2024. The value of park and ride facilities is also acknowledged as this can reduce the reliance of private vehicles for long journeys, allowing part of a journey to be completed by rail. Policy IFR4 details those transport infrastructure projects that will be supported by the Council, of which includes improved parking provision at Kirkham and Wesham railway stations.
Marcus Dowling	Better bus provision		Comments noted, policy IFR5: Ensuring Sustainable Transport Choice requires developments to encourage alternative means of transport to improve accessibility, safety and quality of life for residents. The Council will work with neighbouring authorities and transport providers to help achieve this.
P Stanford	Parking –needs to be FREE for residents across the borough – maybe 1 hours max ? – to promote local shopping – maybe even just Sept to April ?	Sit tight ... and share this with someone who CAN make a difference ! Kirkham needs its swimming pool reopening NOW - kids are drowning as they don't have easy access to pools. A 15 year old from Kirkham recently drowned at Garstang –	Comments noted.

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	(eg in st annes / Lytham its daft having large car parks during the winter “empty” – when allowing residents to park for FREE might just result in increased footfall for businesses ? Don’t come up with excuses – just try it for a year ! Free local (within Fylde) public transport travel for Fylde residents over 60’s – think it happens in London !	ok, he was swimming in a river – but the inquest found he couldn’t swim ! FBC should enable cheap swims across the borough during the school holidays / certain weekends (2nd of the month etc) – even if it was for certain hours – at least you have done SOMETHING – rather than just pontificate and let political parties blame each other. Parts of Cumbria do a similar scheme for 10 p ! – YES TENCE PENCE ! – its happening this wek - so it is possible – you just need the desire to do it. https://www.cumberland.gov.uk/news/2025/make-splash-october-half-term-10p-swims-cumberland-children YOU need to make it possible for ANYONE to get the chance to learn or even just become more confident – and not just those that can afford ! If you can’t persuade Ribby Hall to join in, while you sort Kirkham out, then give kids from K&W free travel to St Annes as part of the scheme. Find the money .. you found it to spend £1.5m on Garden Street St Annes ! Do something NOW – or more kids will drown ! Never / rarely happened when I was a kid – almost EVERYONE could swim by the time they got to secondary school. We swam everywhere, pools, sea, even ponds, rivers etc .. so nothings changed there .. kids are kids .. It’s all about authorities enabling easy access and	

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		affordability ! AGAIN - Rather than wasting all that money on Kirkham market square (including the Hillside and ex Llyod's buildings) and now the St Annes "masterplan" Just imagine what a fanatic scheme could have been provided for the kids ! FBC have failed to prioritise ! .. and VERY, VERY BADLY ! (I see you even charge £2 for an hour in the splash pool at st annes ... WFT – that says it all !) https://www.discoverfylde.co.uk/splashparkzone/ Rant over – but it needed saying ... The situation at Mill Farm on match days I gather is still NOT signed off ./ Agreed / in force / enforced by you ? . Parking ? Why ? Who ? What are you doing about it ? Is the tail wagging the dog ?	
Stephen and Jacqueline Croft		Signage to direct traffic away from B-roads and villages; there could be traffic calming through villages using entry gateways etc in a sensitive best practice way	Comments noted.
Steven Abbott		Realistic allocations for the main land uses will help infrastructure planning. Strategic infrastructure e.g. motorway junction improvements require a public sector	Contributions are sought on a case by case basis where it may be that an individual development is required to fund infrastructure. The Council recognises the tests involved in seeking

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		planning commitment and should not be imposed on individual developers to resolve.	developer contributions to mitigate the impacts of development as per paragraph 58 of the framework.
Blackpool Council	Infrastructure / Transport - Blackpool Council welcomes reference to the South Fylde Line frequency uplift, the T5 Link Road, and junction capacity assessments. These have notable implications for the Fylde Coast's travel-to-work area, labour market access and carbon reduction objectives. We note the recognition that there will be a need to investigate the impacts of new developments planned for up to 2042 on the likely usage of both M55 Junctions 3 and 4 which will identify a programme of measures that will be needed. We would like to add that there will also be likely impacts on Blackpool's highway network and welcome continued collaboration to understand these impacts. Whyndyke Farm - Blackpool	Infrastructure / Transport - Blackpool Council welcomes reference to the South Fylde Line frequency uplift, the T5 Link Road, and junction capacity assessments. These have notable implications for the Fylde Coast's travel-to-work area, labour market access and carbon reduction objectives. We note the recognition that there will be a need to investigate the impacts of new developments planned for up to 2042 on the likely usage of both M55 Junctions 3 and 4 which will identify a programme of measures that will be needed. We would like to add that there will also be likely impacts on Blackpool's highway network and welcome continued collaboration to understand these impacts. Whyndyke Farm - Blackpool Council recognises the importance of Whyndyke Farm as one of Fylde's strategic housing sites. Although it is acknowledged that the intention is for Whyndyke to be as self-sufficient as possible, there will inevitably be impacts on Blackpool's health, education and community infrastructure which we consider should be assessed as part of any future Infrastructure Delivery Plan. We strongly support the recognised need to ensure a cross-boundary approach to the development of infrastructure to support Whyndyke and wider areas. We welcome and strongly support the acknowledgement that Preston New	Support noted. Fylde Council recognises the cross-boundary impacts of development and is committed to engaging with Blackpool Council at the planning application stage. Whitehills is identified as a Strategic Location for Development in the New Local Plan to 2042 where it is acknowledged that provision of new local services and facilities will be required. A new local centre on Cropper Road has been granted planning permission that is currently under construction and will provide convenience retail to serve the immediate Whitehills area. Additionally, Whyndyke is also detailed as a new strategic location to be delivered, whereby the Local Plan notes the need to provide local services and facilities including convenience retail a primary school

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	Council recognises the importance of Whyndyke Farm as one of Fylde’s strategic housing sites. Although it is acknowledged that the intention is for Whyndyke to be as self-sufficient as possible, there will inevitably be impacts on Blackpool’s health, education and community infrastructure which we consider should be assessed as part of any future Infrastructure Delivery Plan. We strongly support the recognised need to ensure a cross-boundary approach to the development of infrastructure to support Whyndyke and wider areas. We welcome and strongly support the acknowledgement that Preston New Road is a physical barrier to movement between the areas and that this can be overcome through effective provision of crossings and traffic management and the need to ensure infrastructure to provide for walking, cycling and public	Road is a physical barrier to movement between the areas and that this can be overcome through effective provision of crossings and traffic management and the need to ensure infrastructure to provide for walking, cycling and public transport to nearby facilities within Blackpool. Whitehills - The document highlights the lack of facilities that have come forward from the Whitehills development and how this leads to car dependence. Continuing to improve facilities for walking, cycling and public transport in the area are key as the development continues to expand.	and public open space to ensure the development is self-sufficient. The Local plan acknowledges that Preston New Road is a physical barrier to development and that this will be overcome through provision of crossing and traffic management measures. To mitigate any local impact on services and local infrastructure, planning contributions will be sought in line with policy IFR2. This requires financial contributions to fund new infrastructure or by providing infrastructure directly as part of the development. Where a development is made unviable by the requirements of a planning obligation the Council will have regard to any evidence submitted by the applicant and consider whether any flexibility in the planning obligation is justified. Any infrastructure required to support the Local Plan will be detailed in the Infrastructure Delivery Plan that is currently being produced.

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	transport to nearby facilities within Blackpool. Whitehills - The document highlights the lack of facilities that have come forward from the Whitehills development and how this leads to car dependence. Continuing to improve facilities for walking, cycling and public transport in the area are key as the development continues to expand.		
Historic England	Historic England would support the option for transport which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy	No comment.	Comments noted, it is a statutory requirement for Historic England to be consulted on planning applications affecting Grade I or Grade II* listed buildings, registered parks and gardens or any registered battlefield. Historic England is a specific consultation body when consulting on Local Plans and development plan documents and strategic planning allocations.

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	and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP.		
National Highways	Q49. National Highways are recommended to support this investigation of further transport schemes and assess and mitigate any impact of development on the SRN, particularly at M55 Junction 3 and 4. While key schemes have been mentioned, further modelling may be required in order to identify the long-term forecast impact on the SRN. WSP recommend the LP explores mitigation measures including junction capacity upgrades, active travel infrastructure linked to SRN corridors and coordinating planning with neighbouring authorities within the Infrastructure Delivery Plan. Any potential impact to the SRN should be coordinated with	Q50. The inclusion of transport infrastructure priorities in the LP is welcomed and it is suggested that the Council develop a comprehensive Infrastructure Delivery Plan, which includes a programme of measures to address the impact of new development on the SRN, particularly by strategic allocations adjacent to or accessed via the SRN. It is recommended that FBC engage with National Highways as early as possible and on a regular basis when developing the Infrastructure Delivery Plan to ensure that infrastructure provision aligns with relevant objectives.	Comments noted, National Highways is a statutory consultee and is a specific consultation body when consulting on Local Plans and development plan documents and strategic planning allocations. It is a statutory requirement for National Highways to be consulted on planning applications affecting the Strategic Road Network (SRN). The Council is investigating the impacts of new development to 2042 on the likely usage of the M55 junction 3. Under policy IFR4 the council will support measures to improve the M55 junction 3 and the A585 and support the delivery of the T5 link road that will connect the Queensway strategic housing site and Blackpool Airport eastern phase that is currently under construction to the M55 junction 4. The Infrastructure Delivery Plan (IDP) that details the infrastructure required

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	National Highways through early and ongoing engagement through the plan making process.		over the plan period to 2042 is being developed. The IDP is a live document that is monitored and refined on a regular basis and, where possible, it outlines delivery partners and funding streams.
Network Rail		(1) Planning Applications LPAs are reminded of their statutory obligations to consult NR on planning applications * Article 16, Part 3, The Town and Country Planning (Development Management Procedure) (England) Order 2015 “Publicity for applications for planning permission within 10 metres of relevant railway land 16.—(1) This article applies where the development to which the application relates is situated within 10 metres of relevant railway land. (2) The local planning authority must, except where paragraph (3) applies, publicise an application for planning permission by serving requisite notice on any infrastructure manager of relevant railway land. (3) Where an infrastructure manager has instructed the local planning authority in writin that they do not require notification in relation to a particular description of development, type of building operation or in relation to specified sites or geographical areas (“the instruction”), the local planning authority is not required to notify that infrastructure manager.	Comments noted, Network Rail is a statutory consultee and is a specific consultation body when consulting on Local Plans and development plan documents and strategic planning allocations. Policy IFR5 addresses the enhancement of sustainable transport and encourages the take up of alternative modes of transport. New development should contribute to the improvement of public transport between the location of the site and nearby town centres , hospitals, railway stations and employment areas where the existing provision is sub-standard or requires further support to continue. The Local Plan recognises the value of rail services for longer trips to reduce reliance on private vehicles. This is also

Respondent name	(49) Are there further transport schemes that should be investigated in order to support the Local Plan?	(50) Do you have further comments on the provision of infrastructure and transport?	Council Response
		(4) The infrastructure manager may withdraw the instruction at any time by notifying the local planning authority in writing (5) In paragraph (2) "requisite notice" means a notice in the appropriate form as set out in HSchedule 3 or in a form substantially to the same effect. LPA's role in delivering sustainable development & housing growth is recognised. However, given the critical nature of the operational railway it is essential that NR is engaged early in the planning process when developments are located in proximity to the railway, involve works near, over/under railway assets, or may otherwise affect railway infrastructure. Failure to consult NR can result in missed opportunities to identify potential risks & mitigation measures at the appropriate stage, leading to delays, increased costs, or, in some cases, serious safety implications. Adverse impact on the operation of the railway will require appropriate mitigation measures to be delivered as part of the planning application process. Only NR can determine the potential for impacts to the railway by outside party proposals. (2) Planning Applications where Level Crossings could be impacted LPA's are reminded of their statutory obligations to consult NR on planning applications which would fall under the following definition. ** Para (J), Schedule 4 of The Town and Country Planning	true where there are park and ride facilities, allowing part of a longer journey to be completed by rail than entirely by car. Locating development in proximity to railway stations further encourages active travel leading to increased rates of walking and cycling.

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		(Development Management Procedure) (England) Order 2015 “Development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway” Consultees – “The operator (Network Rail) of the network which includes or consists of the railway in question, and the Secretary of State for Transport (Officer of Rail and Road)” NR have a legal duty to assess, manage and control the risk at level crossings. NR undertakes periodic assessments of level crossings to review existing risk both individual and collective Any new development should not increase the risk. LPA's are advised that Level Crossings can be impacted by developments in the following ways: a) Development directly next to a level crossing may result in impeded views of the crossing or blocking back by vehicles (a queue of vehicles over the crossing). See photo b) A change in the type of users may increase risk at the crossing e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists/horse riders to use the route or the designation as a cycle/riding route. c) During construction (commercial and residential) where road access to and from the site is via a level crossing or the volume / type of use of a level crossing increases as a result of diverted traffic or of a new highway. d) Noisy developments might impede pedestrian ability to	

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		hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads / industrial development. e) Proposals may interfere with pedestrian and vehicle users' ability to see level crossing warning signs. f) Developments for schools, colleges or nurseries may increase the use of minors using a level crossing. g) Proposals where there are desire lines to restaurants, shops, pubs, schools, colleges may increase the use of the level crossing. h) Proposals that highlight the use of public rights of way that include crossing the railway at a level crossing, or where the level crossing will form part of a public right of way linking into other public rights of way for greater permeability, may increase the use of the level crossing. i) Development where increased numbers of vulnerable users may access the level crossing (dog-walkers, push-chair users, disabled or visually/hearing impaired, the elderly) will likely increase the risk level of the crossing. j) Cumulative impacts of developments – which individually would not increase liability but collectively would increase risk.	
Newton With Clifton Parish Council		b) New residential developments i) A prevailing perception of members is that sometimes planning permission is granted, particularly for residential development, without the required improvements or installation of necessary infrastructure, drainage being specifically cited as an example.	The Council seeks planning contributions from new development to mitigate any impact resulting from said development (policy IFR2: Developer Contributions). This includes seeking planning

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		Members are increasingly concerned about the capacity of existing waste water and foul water infrastructure to handle the added load from new developments. The addition of new homes to an already inadequate system can lead to flooding, ponding and other drainage issues for both new and existing residents. While central government is moving towards making sustainable drainage systems (SuDS) mandatory for new developments, the implementation process is ongoing, and it is considered that the local planning authority should refuse permission, or delay projects, based on any concerns about the capacity of local foul water and waste water infrastructure, even if utility companies have not reported any problems. While the government has pledged to make SuDS mandatory for new developments, the implementation of Schedule 3 of the Flood and Water Management Act 2010 has been slow, and there is still a gap between policy and practice. Prevailing issues with existing systems, developer delays in providing drainage, and a lag in legal and regulatory enforcement compound the problems associated in achieving new residential development targets. This leads to situations where new homes cannot be occupied, due to a lack of a functional drainage connection, and existing residents may experience flooding etc as a result	contributions for flood risk management and sustainable drainage measures. The Local Plan provides detailed guidance on drainage in policies CCH1: Flood Alleviation, Water Quality and Water Efficiency that requires planning decisions to follow the sequential risk-based approach to the location of development as per the framework. This states that flood risk should be minimised by ensuring development incorporates the most sustainable form of managing surface water in accordance with policy CCH2 and supports the retrofitting of SuDS in locations that generate surface water runoff. The policy also recognises the value of green infrastructure and that it should be maximised within development to reduce the risk of flooding. Policy CCH2: Surface Water Run-Off and Sustainable Drainage further requires development to utilise SuDS wherever practical and must reduce discharge to greenfield run-off rates.

Respondent name	(49) Are there further transport schemes that should be investigated in order to support the Local Plan?	(50) Do you have further comments on the provision of infrastructure and transport?	Council Response
		of overloaded systems as a consequence of new development adding pressure to older systems.	No surface water drainage to a combined sewer will be permitted. The Fylde Council Flooding, Water Management and Sustainable Drainage Systems (SuDS) supplementary planning document remains the relevant guidance in relation to the application of policy CCH2..
NHS Property Services		Supporting NHS Estate Transformation Plans NHSPS supports the provision of sufficient, quality community facilities. However, where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of redundant or no longer healthcare suitable sites and properties for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore	Comments noted. The Local Plan supports the provision of new and/or improved health facilities and will seek developer contributions where demand for healthcare services arises from new development. Alternatively, infrastructure may be provided directly by the developer in place of financial contributions. In all cases however where a development is made unviable by the requirements of a planning obligation the applicant must submit appropriate evidence to determine if any flexibility in developer contributions is justified.

Respondent name	(49) Are there further transport schemes that should be investigated in order to support the Local Plan?	(50) Do you have further comments on the provision of infrastructure and transport?	Council Response
		the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community. All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. To ensure the principle of alternative uses for NHS land and property is supported, NHSPS request	

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		the following wording is included within relevant policies in the Local Plan: Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use.	
Pegasus Group for Rowland Homes	6.6. Rowland Homes do not consider any other transport schemes need to be considered, but in order to support an improved frequency on the south Fylde railway line, development around the proposed passing loop – Moss Side; Wrea Green and Kirkham; would be expected to support any business case needing to be developed to secure additional funding to ensure the passing loop is delivered. This also needs to be reflected in the IDP, mentioned above.		Comments noted, the Local Plan refers to a passing loop as part of the improvements to increase the frequency and capacity of railway services on the South Fylde rail line. The delivery of improvements to the South Fylde railway line to double the service frequency are supported under policy IFR4: Transport Infrastructure Projects. A strategic business case was submitted to the Government in 2024.
PWA Planning for Medicom		Transport and the Unparalleled Sustainability of School Farm 8.4. We support the Council's strategic transport priorities. The most effective way to deliver these priorities and create	Sites submitted as part of the call for sites have been evaluated and screened out in the Strategic Housing

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		a sustainable transport network is to locate new housing in places that inherently reduce the need to travel by private car. 8.5. The School Farm site is an exemplar of a sustainable location in this regard, offering unparalleled benefits that cannot be replicated by sites in less accessible parts of the borough: • Walkable Proximity to Major Employment: The site is located immediately adjacent to Warton and its primary employment hub, BAE Systems. This provides a unique and significant opportunity to deliver homes where residents can walk or cycle to work, directly supporting the NPPF's objectives of reducing congestion, promoting active travel, and creating healthier communities. • Access to Local Services: The site is well-related to the existing services and facilities within the Warton settlement, allowing residents to meet day-to-day needs without car dependency. • Strategic Road Network: The site benefits from good access to Bank Lane and the wider strategic road network for journeys that cannot be made by other means. 8.6. The allocation of School Farm would represent a textbook example of sustainable planning, creating a genuine live-work community. Prioritising the release of this sustainable, previously developed 'Grey Belt' site would	and Economic Land Availability Assessment (SHELAA).

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		minimise the impact on the wider transport network and would be a far more sustainable strategy than allocating less accessible greenfield sites that would inevitably generate higher levels of car-dependent travel.	
PWA Planning for Pringle Homes	8.5. The Greenlands Farm site is a prime example of such a sustainable location. Its allocation would strongly align with the NPPF's objective of focusing development where a genuine choice of transport modes is available. As detailed in our 'Call for Sites' submission, the site benefits from exceptional existing connectivity: • Public Transport: Bus stops are available just 200m from the proposed site entrance on Ribby Road, with regular services connecting to Preston, Blackpool, Kirkham, St Annes, and Lytham. The site is also in close proximity (3km) to Kirkham & Wesham Train Station, providing access to the regional and national rail network. • Active Travel: The site's location		Sites submitted as part of the call for sites have been evaluated and screened out in the Strategic Housing and Economic Land Availability Assessment (SHELAA).

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	on the immediate edge of the Wrea Green settlement, with existing lit footways along Ribby Road, provides safe and direct pedestrian and cycle access to the village's comprehensive range of local services, including the primary school and shops. • Strategic Road Network: The site has excellent vehicular access to the A583 and is just 4km from Junction 3 of the M55, providing connections to the wider road network. 8.6. The allocation of Greenlands Farm would represent an efficient use of land, capitalising on existing infrastructure and promoting sustainable travel patterns from day one. It is a highly deliverable site that does not require major, costly new transport infrastructure to be viable, making it a low-risk and highly beneficial allocation for the Council to meet its housing needs sustainably.		

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PWA Planning	8.6. We welcome the significant recent investment in the borough's strategic road network, particularly the completion of the Heyhouses to M55 Link Road (Lytham St Annes Way) and the Preston Western Distributor Road (Edith Rigby Way). These projects have already had a positive impact on connectivity and are key enablers for the growth allocated in the current Local Plan. 8.7. We strongly support the further transport schemes identified by the Council as priorities for the new plan period, including: 8.8. The T5 Link Road, which is critical for unlocking the full potential of the Queensway strategic site and the Blackpool Airport Enterprise Zone. 8.9. Improvements to the South Fylde rail line, which will enhance sustainable transport options for the borough's main coastal	8.12. Regarding further transport schemes, we agree that the emerging Local Transport Plan, alongside detailed, site-specific Transport Assessments accompanying major planning applications, will be the appropriate, evidence-led mechanisms to identify any further necessary interventions. 8.13. Finally, we would emphasise the importance of fully integrating infrastructure for sustainable and future-proofed transport into the design of all new developments. This includes providing high-quality, safe, and connected networks for active travel (walking and cycling) and ensuring the provision of Electric Vehicle (EV) charging infrastructure, in line with the objectives of Chapter 9 of the NPPF.	Support noted. Policy IFR5: Enhancing Sustainable Transport requires development to improve community health by providing and encouraging the take up of alternative means of transport, including walking and cycling. The policy requires this through the design of the built environment, including creating walking and cycling linkages separate from the main highway, linking to existing rights of way and designing the site layout to reduce walking and cycling distances. Contributions to the improvement of public transport between the site and nearby facilities are also required.

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	settlements. 8.10. Upgrades to Kirkham and Wesham station and assessment of capacity at M55 junctions, which are necessary to support the planned growth at Kirkham and Wesham and the Fylde Blackpool Periphery.8.11. These schemes are logical priorities that will support the delivery of the development strategy.		
United Utilities		We would welcome early sight of any transport schemes. The delivery of transport schemes can raise asset protection issues. We also recognise that transport schemes can represent an opportunity to lay new or improved infrastructure, especially where the transport scheme is proposed in response to wider growth proposals. Therefore early engagement with infrastructure providers regarding potential transport schemes is crucial.	Comments noted, United Utilities as the water undertaker is a specific consultation body and it is a statutory consultee for Local Plans, development plan documents and strategic planning allocations.

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Bryning with Warton Parish Council	Yes a comprehensive joined up plan would be best. But with separate annexes that can be updated in part as required. Including one on the assessment of Flood planes and the impact to the water table.	Yes, Especially where landscaping and maintenance of open spaces apply	Yes, If blocks of housing are built then external fabrication must meet the latest standards/codes. And Floodplanes /water run off management	The strategic planning of multiple developments in one area (ie Warton) should always be susceptible to infrastructure payments if over 10 houses. Also the same developer breaks down building developments into smaller chunks of 10 or less houses in a 5 year period, Infrastructure payments are then required.		The Council has proceeded with a single policy covering all aspects of design (DSA1: Achieving Good Design in Development). This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered

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						including flood risk, whereby in the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents. The Council's policy approach to seeking developer contributions is detailed in policy IFR2: Developer Contributions,

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						which requires developers to provide funds to mitigate the impact of a development scheme through financial payments. In some instances the infrastructure will be brought forward directly as part of the scheme rather than a financial contribution. Where viability constraints arise as the result of a

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						planning obligation the council will consider appropriate evidence and consider whether any flexibility is justified. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas.

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Christine Abbott	Yes				Design details should be clear and fully available in the developers Draft Plan and not submitted at a later date, I.e. after Plan approval when changes are easily made.	Comments noted. The Council has proceeded with a single policy covering all aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in

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						the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents. One of the general principles of good design is ensuring that the quality of approved development remains and is not materially diminished

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						between planning approval and completion of the scheme. This is reflected in policy DSA1: Achieving Good Design in Development.
Emma Swindells	Separate					Comment noted.
Ethan Ellison	Single Policy to ensure consistency and limited contradictions on weight of each policy.					Comment noted.

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Frank Andrews	existing policy is OK					Support noted.
Gerard Malone	No opinion	No opinion	No opinion	No opinion	No opinion	Comments noted
Hannah Dell'Armi		I think if building in rural areas then any new development should be in keeping with the style and landscaping of the existing area				Comments noted. The Local Plan to 2042 will require various aspects of a development's design to relate well to the surrounding context. This includes the siting, layout, massing, scale, design, materials, architectural

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						character, proportion, building-to-plot ratio and landscaping of the proposed development. Existing poor-quality development should not be used as the premise for poor quality development to be brought forward, whereby new development should be treated as an opportunity

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						to enhance the area. Development should make a positive contribution to the character and local distinctiveness of the area through quality design but it is important that it responds to the local context.
Irene Jacques	Single policy is best. Separate policies adds	On new housing developments more space around each home.	Protection of existing trees on all new housing developments and		In the near future lots more public EV chargers will be needed.	The Council has proceeded with a single policy covering all

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	complexity and cost.	Wider roads on new build housing developments. Housing developers should be encouraged to install solar panels/non gas boilers in new build homes and plant more trees.	where possible on any new roads/train routes.			aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and

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						supplementary planning documents. The use of landscaping is encouraged in the new Local Plan and integrating multi-functional green infrastructure into the urban area is one component of the general principles of good design.
John Leadbeater	Yes, preferably				I think the design of the recent new housing estates has in	The Council has proceeded with a single policy

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					general been better than those of previous generations. The use of landscaping and a variety of trees, hedges etc is to be welcomed.	covering all aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes,

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						design guides and supplementary planning documents. The use of landscaping is encouraged in the new Local Plan and integrating multi-functional green infrastructure into the urban area is one component of the general principles of good design.

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John Maskell	Single policy	Rural areas should have specific design considerations	Yes - rural areas should have their own design codes	Strategic sites should be government controlled - Whindyke is a classic example of where development should not be left to disparate organisations.		The Council has proceeded with a single policy covering all aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards

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						further design guidance such as design notes, design guides and supplementary planning documents. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas. With regards to rural areas, the Local

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						Plan requires that existing landscape features and natural assets should be protected as an integral part of a development.
Keith McKay	Single policy could be unflexible and unwieldy to be successful. Probably better to separate them but understand	Where protected sites are involved, yes.	Yes, see above.	Take advantage of local knowledge and expertise in the exchange of ideas - there is plenty to pick from. Recent experience in relation to Wind Farms has shown what we can do together!	As Above.	Comments noted. The Council has proceeded with a single policy covering all aspects of design. This details the principles of good design including

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	how they have to link together.					density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents.

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						The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas.
Linda Nulty	seperate policies	rural particularly		Masterplan - what a novel idea. Never seen it work in FBC e.g. Mill Farm (Sports) Village.		The Council has proceeded with a single policy covering all aspects of design. This details the principles of good

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						design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents.

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						The policy provides overarching guidance rather than applying to specific areas, although it does prescribe that development is to be sympathetic to surrounding land uses, protect existing landscape features and natural assets and conserve and enhance the built and historic environment.

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Lytham St Annes Civic Society	Single policy should be developed so there is no wiggle room for developers. Solar panels, heat pumps, surface water harvesting etc should be required in all new developments. There is government legislation for this which is currently not mandatory.	Yes, specific design considerations should be applied in areas where a proposed design is out of character with the houses around. For example a road such as the Boulevard has a distinct character throughout which should be preserved regardless of whether it is in a conservation area.	There should be specific guides in for example Conservation Areas, established town centres, shopping areas, housing estates. We now have several housing estates which produce identical housing types.		Money must not talk, a wealthy person redeveloping a significant local property should not be able to change the fundamental feel of an area. Redevelopment can and should be done architecturally sympathetically to the area. Greater clarity is needed regarding what constitutes “high level of neighbour amenity” in practice. When developers’ design	The Council has proceeded with a single policy covering all aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy

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	The BRE guidelines on sunlight and daylight within planning applications should be adopted. Any redevelopment should be considered in the context in which it sits as a poor redevelopment can negatively impact a whole street. This should apply for whatever era the				statements contain vague language and applications are validated without requiring further clarification, the burden of proof falls entirely on residents who lack planning expertise and are therefore in a weakened position.	and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents. Local Plan policy DSA1 details the principles of good design which should be adhered to. The siting, layout, massing, scale, design, materials, architectural character,

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	original property comes from. The mass of buildings should also be considered to ensure that redevelopments do not become too big for the plot on which they sit.					proportion, building to plot ratio and landscaping of the proposed development should relate well to the surrounding context. New development should make a positive contribution to the character and local distinctiveness of the area through high quality new design that

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						responds to its context. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas. Development should also conserve and enhance the historic environment, making a positive

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						contribution to the character and local distinctiveness of the area through design that responds to its context.
Marcus Dowling	No - blanket policies are inflexible so individual policies are more suitable					Comment noted.
Stephen and Jacqueline Croft	A joined up plan seems to be a minimum goal. Sensitivity to existing environment is a	Yes	Yes ... and they should be developed case-by-case ... so hard to be specific here.	How is it done now? One feels there is need for professional input but that the professionals need to step outside their echo chamber to translate book		The Council has proceeded with a single policy covering all aspects of design. This details the

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	must. It seem to me many new estates are simply replicas of those built anywhere and the local character is lost			knowledge into solutions that resonate with the locals		principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary

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						planning documents.
Steven Abbott	Not a single policy as that is too prescriptive. It would not take account of the different characteristics of the parts which make up the district. A Design section would be better. On context, layout, building form, landscaping,		A general policy for all sites is unnecessary. These should apply to 'true' strategic sites only – where allocated e.g. if any are proposed for over a 1,000 homes and other land uses. Unnecessary delays to delivery will occur to delivering homes otherwise. Master plans can be negotiated on a site-		Seek high quality but do not thwart innovation or creativity.	The Council has proceeded with a single policy covering all aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are

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	movement etc the methodology used by the National Design Code should be followed with input from an urban design specialist if possible.		by-site basis where necessary otherwise, but reputable housebuilders produce them for large sites anyway. We would be concerned whether the Council will be able to resource the negotiation and management of master plans district wide.			also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents. Policy DSA1: Achieving Good Design in Development notes that where required, all development proposals should be accompanied

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						by a Design and Access statement that fully explains and justifies the design approach for the scheme. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas.

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Avison Young for National Gas					Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands	Comments noted. High-quality design is championed in the Local Plan, however it must also be sympathetic to surrounding land uses and occupiers (policy DSA1). Policy IFR3 provides protection for strategic national infrastructure, specifically including national gas pipelines.

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					that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets.	
Defence infrastructure Organisation			In considering design codes and any areas to where they apply, the Council should ensure that defence sites are exempt. The design of defence developments are			Comments noted. The value of design codes is acknowledged in the Local Plan and that these can be used to set out design principles, to

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			informed by current and future operational requirements which could result in a development that might be outside of the parameters of design code in terms of both size and appearance. In such circumstances this could restrict defence development contrary to paragraph 102 of the NPPF.			strive for higher design quality for specific sites or areas. However, the Local Plan has specific policies that safeguard the activities of defence sites and defence infrastructure. Policy DST5 details that development at BAE Systems Warton and MoD Inskip will only be permitted in accordance with

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						policies ECD1 and IFR3 respectively. IFR3 details that development and mitigation measures will not be permitted where it would prejudice the safety or restrict the operation of Warton Aerodrome, Weeton Barracks or MoD Inskip. Similarly, ECD1 says that development proposals that would

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						compromise the security of the Warton Aerodrome and wider BAE Systems site at Warton will not be permitted. The Local Plan also contains a standalone policy for the protection of Weeton Barracks Service Accommodation. Policy HOU7 details that development proposals in the vicinity of

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						Weeton Barracks will be assessed for any potential restrictions towards military activity or future military development within the Weeton Barracks site. Where development proposals would have such impacts, they will not be permitted.
Environment Agency	Some elements of design are often qualitative and	Some elements of design are often qualitative and how	Some elements of design are often qualitative and how		Some elements of design are often qualitative and how	The Council has proceeded with a single policy

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	how they are judged by others cannot be quantified. However, aspects of design that can be quantified and can be easily measured include minimum standards in relation to emissions, standards as assessed against existing approaches (e.g. BREEAM) and even biodiversity value of a site	they are judged by others cannot be quantified. However, aspects of design that can be quantified and can be easily measured include minimum standards in relation to emissions, standards as assessed against existing approaches (e.g. BREEAM) and even biodiversity value of a site (refer to the DEFRA biodiversity metric). The ability to quantify and	they are judged by others cannot be quantified. However, aspects of design that can be quantified and can be easily measured include minimum standards in relation to emissions, standards as assessed against existing approaches (e.g. BREEAM) and even biodiversity value of a site (refer to the DEFRA biodiversity metric). The ability to quantify and		they are judged by others cannot be quantified. However, aspects of design that can be quantified and can be easily measured include minimum standards in relation to emissions, standards as assessed against existing approaches (e.g. BREEAM) and even biodiversity value of a site (refer to the DEFRA biodiversity metric). The ability to quantify and measure requirements will give developers the upfront ability to cost schemes	covering all aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes,

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	(refer to the DEFRA biodiversity metric). The ability to quantify and measure requirements will give developers the upfront ability to cost schemes in relation to land values and avoid viability concerns at a later date. Developers need to know what they have to provide and policies with requirements that	measure requirements will give developers the upfront ability to cost schemes in relation to land values and avoid viability concerns at a later date. Developers need to know what they have to provide and policies with requirements that appear negotiable may not be adequately factored in at the design stages. There will be some instances	measure requirements will give developers the upfront ability to cost schemes in relation to land values and avoid viability concerns at a later date. Developers need to know what they have to provide and policies with requirements that appear negotiable may not be adequately factored in at the design stages. There will be some instances		in relation to land values and avoid viability concerns at a later date. Developers need to know what they have to provide and policies with requirements that appear negotiable may not be adequately factored in at the design stages. There will be some instances where the size of the development or the nature of the site will prevent some requirements being provided on-site, but it should be the	design guides and supplementary planning documents. When providing infrastructure to mitigate the impacts of development it is acknowledged that viability must be accounted for. Policy IFR2 is clear that development will normally be expected to contribute towards the mitigation of its

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	appear negotiable may not be adequately factored in at the design stages. There will be some instances where the size of the development or the nature of the site will prevent some requirements being provided on-site, but it should be the applicants responsibility to clearly demonstrate why	where the size of the development or the nature of the site will prevent some requirements being provided on-site, but it should be the applicants responsibility to clearly demonstrate why this is the case through sound evidence and there should be some policies (such as net gain) that require developers to do something off-site if they cannot do it on site. In addition to	where the size of the development or the nature of the site will prevent some requirements being provided on-site, but it should be the applicants responsibility to clearly demonstrate why this is the case through sound evidence and there should be some policies (such as net gain) that require developers to do something off-site if they cannot do it on site. In addition to		applicants responsibility to clearly demonstrate why this is the case through sound evidence and there should be some policies (such as net gain) that require developers to do something off-site if they cannot do it on site. In addition to the design of the building, the site layout is also an issue for consideration. Often, site layouts are focussed on maximising the area of land for housing /	impact on infrastructure, services and the environment. Where development is unviable by the requirements of a planning obligation the council will have regard to appropriate evidence submitted by an applicant and consider whether any flexibility in the planning

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	this is the case through sound evidence and there should be some polices (such as net gain) that require developers to do something off-site if they cannot do it on site. In addition to the design of the building, the site layout is also an issue for consideration. Often, site layouts are focussed on maximising the	the design of the building, the site layout is also an issue for consideration. Often, site layouts are focussed on maximising the area of land for housing / employment use with little or no land reserved for nature, watercourses or open space. And where natural green spaces are provided, they tend not to be connected to other similar spaces on or off-site. We	the design of the building, the site layout is also an issue for consideration. Often, site layouts are focussed on maximising the area of land for housing / employment use with little or no land reserved for nature, watercourses or open space. And where natural green spaces are provided, they tend not to be connected to other similar spaces on or off-site. We		employment use with little or no land reserved for nature, watercourses or open space. And where natural green spaces are provided, they tend not to be connected to other similar spaces on or off-site. We encourage the provision of a site design policy that incorporates multiple benefits, retains open space and priority habitats and retains ecological corridors within an overall development design.	obligation is justified. Where appropriate, the Council will permit developers to provide the necessary infrastructure themselves as part of their development proposals, rather than making financial contributions.

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	area of land for housing / employment use with little or no land reserved for nature, watercourses or open space. And where natural green spaces are provided, they tend not to be connected to other similar spaces on or off-site. We encourage the provision of a site design policy that incorporates	encourage the provision of a site design policy that incorporates multiple benefits, retains open space and priority habitats and retains ecological corridors within an overall development design.	encourage the provision of a site design policy that incorporates multiple benefits, retains open space and priority habitats and retains ecological corridors within an overall development design.			

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	multiple benefits, retains open space and priority habitats and retains ecological corridors within an overall development design.					
Historic England	An approach should ensure that there is a positive impact on the Borough in terms of good design.	Good design should be expected throughout the Borough and not just in selective places. The use of more detailed guidance such as masterplans, can be used on specific locations.	Design codes should be location specific to ensure they are relevant to different areas. The requirement for additional guidance such as masterplanning should be included		No further comment at present.	Comments noted. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for

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			within site specific policies/requirements.			specific sites or areas.
Home Builders Federation				Design and Amenity 35. Within Section 12, the NPPF is clear about the importance of design in creating successful and sustainable places and the HBF recognises this as an important component of plan-making. 36. In producing policies to cover this area in the new Local Plan, the Council should seek to balance the need for clarity about design expectations		Comments noted. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas. Policy IFR2 is clear that development will normally be

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				without policies or design codes becoming too rigid and overly prescriptive, as this can stifle innovation in design. It is also not the place of the Council to seek to impose its own style on developments as this will also need to be informed by an understanding of an individual site's opportunities and constraints. 37.Any specific requirements that are included in future policies should be based on robust evidence and tested in		expected to contribute towards the mitigation of its impact on infrastructure, services and the environment. Where development is unviable by the requirements of a planning obligation the council will have regard to appropriate evidence submitted by an applicant and

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				terms of their impact on viability.		consider whether any flexibility in the planning obligation is justified.
Lancashire County Council					A lack of physical activity in everyday routines, combined with other lifestyle factors, can lead to poor health outcomes at a population level. As with the issue of excess weight, physical inactivity is a complex problem, influenced by a wide range of factors.	Policy DSA1: Achieving Good Design in Development encourages active travel through the design of development schemes, prioritising cyclist and pedestrians over private

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					Some of these factors can be addressed at the local level, including through the design and master planning of development proposals to support the creation of active environments. The Active Design principles , developed by Sport England and supported by the Office for Health Improvement and Disparities, are intended to support planners, designers,	vehicles through measures including the protection, extension and linking up of existing routes. New development should ensure the layout, design and landscaping of all elements of the proposal, including any internal roads, pedestrian footpaths, cycleways and open spaces,

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					and developers (amongst other stakeholders) to shape these environments, to ensure that the active choice is the easiest and most attractive choice for all, at the local level. To achieve this, it is recommended that all new developments, as far as is relevant to the specific development proposal, adhere to the ten Active Design Principles: 1. Activity for all	create user friendly, sustainable and inclusive connections between people and places. Routes from a site should connect legibly into established route networks in the area to create safe and user-friendly routes to local facilities, encouraging linked trips. Providing clear pedestrian and

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					All environments should support physical activity equitably across all ages, ethnicities, genders, and abilities, enabling everyone to be active and build long-term active habits and behaviours. This is essential for the delivery of all the principles of Active Design and is its foundational principle. 2. Walkable communities Facilities for daily essentials and	cycle routes and high quality public spaces can promote health and wellbeing. In order to promote community cohesion and inclusivity new development will be expected to deliver a mixture of uses, strong neighbourhood centres and active street frontages that bring people in the vicinity

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					recreation should be within easy reach of each other by active travel means, making it more likely that people will make the journey by using active travel modes. Good active travel connections should be provided to extend the range of services that are accessible while remaining physically active. 3. Providing connected active travel routes Encourage active travel for all ages and abilities	together. This is promoted in DSA1 and is one of the general principles of good design. DSA1 advocates that providing enhancements to public spaces encourages people to use them. New public open space should normally be provided in a single central usable facility where possible that is accessible,

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					by creating a continuous network of routes connecting places safely and directly. Networks should be easy to use, supported by signage and landmarks to help people find their way. 4. Mixing uses and co-locating facilities People are more likely to combine trips and use active travel to get to destinations with multiple reasons to visit. Places with more variety, higher densities, and a mix of	well designed and high quality that includes a range of facilities. These should be visible and safe, incorporating facilities for a range of ages. Policy DSA1 further signposts to additional guidance including the Councils Supplementary Planning Documents, Design Guides and Design Notes.

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					uses also reduce the perception of distance when travelling through spaces. They also generate the critical mass of travel demand to better support public transport services. 5. Network of Multifunctional Open Spaces Accessible and high-quality open space should be promoted across cities, towns and villages to provide opportunities for sport and physical activity, as	

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					well as active travel connections and natural or civic space for people to congregate in and enjoy. Providing multifunctional spaces opens up opportunities for sport and physical activity and has numerous wider benefits. 6. High Quality Streets and Spaces Streets and outdoor public spaces should be Active Environments in their own right. They should	

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					be safe, attractive, functional, prioritise people and able to host a mix of uses, with durable, high-quality materials, street furniture in the right places and easy-to-use signage. High quality streets and spaces encourage activity, whereas poor quality streets and spaces are much less likely to be used to the same degree. 7. Providing activity infrastructure Infrastructure to	

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					enable sport, recreation and physical activity to take place should be provided across all contexts including workplaces, sports facilities and public space, to facilitate activity for all. 8. Active buildings, inside and out Buildings we occupy shape our everyday lives, both when users are inside and outside. Buildings should be designed with providing opportunities for	

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					physical activity at the forefront, considering the arrival experience, internal circulation, opportunities to get up and move about, and making the building an active destination. 9. Maintaining high-quality flexible spaces Spaces and facilities should be effectively maintained and managed to support physical activity. These places should be monitored to understand how they are used, and flexible	

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					so that they can be adapted as needed. 10. Activating spaces The provision of spaces and facilities which can help to improve physical activity should be supported by a commitment to activate them, encouraging people to be more physically active and increasing the awareness of activity opportunities within a community. Fylde's Healthy Living SPD12 references the	

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					Active Design Principles and states that " Applicants will be encouraged to include Active Design Principles within their applications". While the levels of physical inactivity in Fylde are, overall, better than or in-line with the local and national picture, the proportion of Fylde's residents who are considered inactive varies notably by age. For adults, 25.4% are categorised as inactive,	

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					meaning that they engage in less than 30 minutes of physical activity per week (2023/24) . This is similar to the rates of physical inactivity in England (25.1%) and slightly better than Lancashire (27.3%). For children and young people, however, 43% are categorised as inactive in Fylde. This is considerably worse than both the rates of physical inactivity in England (29.5%) and Lancashire (32.3%).	

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					Data from the Active Lives Survey (2023/24) concerning attitudes towards physical activity suggest that some barriers to active lifestyles do exist in Fylde, however. For those who are physically inactive (engage in less than 30 minutes of physical activity per week), 56.4% of respondents in Fylde disagree that they have the opportunity to be physically active, compared to 50.6% in Lancashire and 44.3%	

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					in England. This data highlights that continued work is required to support Fylde's residents in adopting more active, healthier lifestyles²¹. In terms of cycling and walking, data from the National Travel Survey and the Active Lives Survey shows that, in 2023 11.7% of adults in Fylde cycled for any purpose including travel at least once per week. 14.2% of adults in Fylde walked for the purpose of travel at	

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					least 3 times per week. There is an opportunity for the Fylde Local Plan to 2042 to make a positive contribution to increasing these rates by developing environments that encourage active travel. In order to ensure that future developments in Fylde support the adoption of active lifestyles Public Health recommends the following wording is incorporated into the Fylde Local Plan to	

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					2042 1. All new developments to be designed and built in accordance with the ten Active Design Principles .	
Lichfields for Taylor Wimpey	8. Design and Amenity Taylor Wimpey considers that a single policy covering design would be sufficient in informing design standards	8. Design and Amenity Taylor Wimpey considers that a single policy covering design would be sufficient in informing design standards provided relative flexibility is	8. Design and Amenity Taylor Wimpey considers that a single policy covering design would be sufficient in informing design standards provided relative flexibility is		8. Design and Amenity Taylor Wimpey considers that a single policy covering design would be sufficient in informing design standards provided relative flexibility is built into the policy wording based on the	Comments noted. The Council has proceeded with a single policy covering all aspects of design. This details the principles of good design including density, heritage impact, materials,

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	provided relative flexibility is built into the policy wording based on the site context. Taylor Wimpey is supportive of a policy that sets clear design expectations for developers; however, policies must not be overly prescriptive and preclude crucial housing development from coming forward through	built into the policy wording based on the site context. Taylor Wimpey is supportive of a policy that sets clear design expectations for developers; however, policies must not be overly prescriptive and preclude crucial housing development from coming forward through opaque and difficult to achieve design policies. Design requirements must therefore take	built into the policy wording based on the site context. Taylor Wimpey is supportive of a policy that sets clear design expectations for developers; however, policies must not be overly prescriptive and preclude crucial housing development from coming forward through opaque and difficult to achieve design policies. Design requirements must therefore take		site context. Taylor Wimpey is supportive of a policy that sets clear design expectations for developers; however, policies must not be overly prescriptive and preclude crucial housing development from coming forward through opaque and difficult to achieve design policies. Design requirements must therefore take full account of viability considerations and be supported by robust evidence.	massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents.

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	opaque and difficult to achieve design policies. Design requirements must therefore take full account of viability considerations and be supported by robust evidence.	full account of viability considerations and be supported by robust evidence.	full account of viability considerations and be supported by robust evidence.			
National Highways	Q51. Whilst WSP would suggest that this policy would not specifically require a comment from	Q52. No specific comment. However, if strategic sites are close to or accessed via the SRN, design considerations should include	Q53. The use of design codes for strategic sites should be supported, particularly where those may impact transport		Q54. It is recommended the LP includes transport considerations in design policies, so those are considered from the outset.	Comments noted, National Highways is a statutory consultee and is a specific consultation body

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	National Highways, it is important that National Highways are consulted from early plan-making stages to ensure that the design takes into account any infrastructure that supports the resilience and safe operation of the SRN and supports a vision-led approach in line with DfT Circular 01/2022.	access arrangements, traffic impact and integration with wider transport networks.	infrastructure. Areas close to the SRN junctions would benefit from design codes addressing access, movement and mitigation measures. Master planning should include early engagement with National Highways to set out infrastructure requirements.		Design should support Travel Demand Management, active travel and public transport integration.	when consulting on Local Plans and development plan documents and strategic planning allocations. The design policy DSA1 details design considerations towards the highway, including how design can impact upon vehicle and pedestrian safety and traffic movements. It requires

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						development proposals to consider public transport and encourage active travel. The policy concludes by signposting to relevant design guides and design notes published by the Council which can provide additional guidance to specific areas of the borough.

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NHS Property Services					Healthy Developments There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider	The local plan policy DSA1 incorporates guidance and recommendations to promote health and wellbeing in new developments through good design. DSA1 encourages active travel through the design of development schemes, prioritising cyclist and pedestrians over private

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					determinants of health. Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we would welcome the inclusion of a comprehensive policy on health and wellbeing in the Local Plan and encourage the Council to engage with the NHS on this matter ahead of the	vehicles through measures including protecting, extending and linking up of existing routes. The policy also encourages schemes to design out crime and encourage social interaction through providing clear pedestrian and cycle routes and high quality public spaces that promote health and wellbeing.

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					Regulation 19 document being prepared. Specific policy requirements to promote healthy developments should include: • Proposals should consider local health outcomes, and where appropriate to the local context and/or size of the scheme include a Health Impact Assessment. • Design of schemes should encourage active travel, including	DSA1 advocates that providing enhancements to public spaces encourages people to use them. In order to promote community cohesion and inclusivity new development will be expected to deliver a mixture of uses, strong neighbourhood centres and active street frontages that

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					through providing safe and attractive walking and cycling routes, and ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes. • Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space).	bring people in the vicinity together. This is promoted in DSA1 and is one of the general principles of good design. Additionally, the policy notes that good design should conserve and enhance the built and historic environment , make a positive contribution to the character and local distinctiveness of

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					• Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces. • Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater	the area through high quality new design and be sympathetic to surrounding land uses.

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					collection, and efficient design. • Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes. • Ensure development embraces and respects the context and heritage of the surrounding area. • Provide the necessary mix of housing types and	

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					affordable housing, reflecting local needs. • Provide sufficient and high quality green and blue spaces within developments. • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.	

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PWA Planning for Medicom	9.1. We strongly support the principle that high-quality design is a fundamental component of sustainable development, as emphasised in Chapter 12 of the National Planning Policy Framework (NPPF). Good design creates better places, adds value, and helps to make development	9.6. The School Farm site, with its unique context as previously developed land adjacent to the Warton settlement, requires a bespoke design solution rather than a generic, area-wide code. Our forthcoming 'Call for Sites' submission will set out a clear vision for the site, demonstrating how a high-quality, landscape-led masterplan can sensitively integrate	9.5. While we support the principle of design codes for some strategic sites, it is crucial that the masterplanning process is appropriate for the site in question.	A more collaborative and efficient approach, explicitly supported by NPPF paragraph 134, is for the Plan to positively encourage developer-led vision documents and masterplans prepared in support of planning applications and site promotions.	9.7. The most important principle that must be embedded within the new Local Plan's approach to design is the need for flexibility and the encouragement of innovation. 9.8. A rigid, 'tick-box' approach to design can stifle the very creativity needed to bring forward challenging sites. The redevelopment of a 'Grey Belt' site like School Farm is a prime opportunity to deliver	Comments noted. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas. Policy DSA1: Achieving Good Design in Development requires that all development should be accompanied by a design and access

Respondent name	(51) Should the new plan have a single policy covering all elements of design or separate policies for layout, context, building form, landscaping, movement etc?	(52) Should the new Local Plan identify any areas where specific design considerations will apply (on a strategic basis)? If so, which areas and what specific considerations should be identified?	(53) Should the new Local Plan identify areas to be covered by design codes? If so, which areas should these be?	(53a) Do you have any comments on how the masterplanning of strategic sites should be undertaken, and how requirements for it should be reflected in the new plan?	(54) What further comments do you have on how the new Local Plan should address the issue of design?	Council Response
	acceptable to communities. 9.2. The site at School Farm, Warton, presents a unique opportunity to deliver an exemplary, well-designed community on a previously developed 'Grey Belt' site. The new Local Plan must contain a design policy framework that is flexible and enabling enough	new homes, retain and enhance the site's positive features, and create a strong sense of place. The new Local Plan's policy should be flexible enough to support this developer-led approach.			an innovative scheme that raises the standard of design in the area. 9.9. The NPPF is clear on this point. Paragraph 139b gives "significant weight" to: "...outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."	statement that fully explains and justifies the design approach for the scheme. The Council has proceeded with a single policy covering all aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural

Respondent name	(51) Should the new plan have a single policy covering all elements of design or separate policies for layout, context, building form, landscaping, movement etc?	(52) Should the new Local Plan identify any areas where specific design considerations will apply (on a strategic basis)? If so, which areas and what specific considerations should be identified?	(53) Should the new Local Plan identify areas to be covered by design codes? If so, which areas should these be?	(53a) Do you have any comments on how the masterplanning of strategic sites should be undertaken, and how requirements for it should be reflected in the new plan?	(54) What further comments do you have on how the new Local Plan should address the issue of design?	Council Response
	to facilitate such innovative, site-specific solutions. 9.3. We advocate for a single, comprehensive design policy within the new Local Plan. 9.4. A single, overarching policy provides a clear and holistic framework that allows applicants and decision-makers to consider all aspects of design				9.10. The new Local Plan's design policy must explicitly include this provision. It must empower the Council to approve well-conceived, high-quality schemes that represent genuine architectural quality and innovation, particularly on sites like School Farm where a bespoke design solution can deliver significant environmental and community benefits.	environment are also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents.

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	in an integrated way. This approach facilitates the application of professional planning judgment to arrive at a balanced decision on a scheme's overall design merit, which is essential for assessing bespoke proposals on complex sites like School Farm. Fragmented policies can					

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	become overly prescriptive and stifle the creativity needed to deliver exceptional places.					
PWA Planning for Pringle Homes	9.1. Pringle Homes strongly supports the principle that high-quality design is a fundamental component of sustainable development, as emphasised in Chapter 12 of the				9.7. The most important principle that must be embedded within the new Local Plan's approach to design is the need for flexibility and the encouragement of innovation. 9.8. Pringle Homes' properties are known	Support noted. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas.

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	National Planning Policy Framework (NPPF). As a family-owned housebuilder known for our distinctive Arts and Crafts-inspired style and commitment to craftsmanship, we believe good design is essential for creating lasting, desirable communities. 9.2. The proposed development at Greenlands Farm,				for their "distinctive Arts and Crafts-inspired style and designs that are both timeless and instantly recognisable, standing out from the crowd". While design codes are valuable for setting a baseline of quality, they must never become a rigid, 'tick-box' straitjacket that stifles this kind of architectural creativity and distinctiveness. 9.9. The NPPF is clear on this point.	

Respondent name	(51) Should the new plan have a single policy covering all elements of design or separate policies for layout, context, building form, landscaping, movement etc?	(52) Should the new Local Plan identify any areas where specific design considerations will apply (on a strategic basis)? If so, which areas and what specific considerations should be identified?	(53) Should the new Local Plan identify areas to be covered by design codes? If so, which areas should these be?	(53a) Do you have any comments on how the masterplanning of strategic sites should be undertaken, and how requirements for it should be reflected in the new plan?	(54) What further comments do you have on how the new Local Plan should address the issue of design?	Council Response
	Wrea Green, is a clear expression of this ethos. The design concept is meticulously shaped by the distinctive character of the village and the wider Fylde landscape. The new Local Plan should set out a clear, positive, and flexible framework that encourages and enables this level				Paragraph 139b gives "significant weight" to: "...outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings." 9.10. The new Local Plan's design policy must explicitly include this provision. It must empower the Council to approve	

Respondent name	(51) Should the new plan have a single policy covering all elements of design or separate policies for layout, context, building form, landscaping, movement etc?	(52) Should the new Local Plan identify any areas where specific design considerations will apply (on a strategic basis)? If so, which areas and what specific considerations should be identified?	(53) Should the new Local Plan identify areas to be covered by design codes? If so, which areas should these be?	(53a) Do you have any comments on how the masterplanning of strategic sites should be undertaken, and how requirements for it should be reflected in the new plan?	(54) What further comments do you have on how the new Local Plan should address the issue of design?	Council Response
	of design quality across the borough. 9.3. We support the principle of using design codes to provide certainty and guide the development of major strategic sites, as encouraged by NPPF paragraph 133. 9.4. However, the most efficient and collaborative approach, explicitly supported by				well-conceived, high-quality schemes that represent genuine architectural quality and innovation, thereby enabling developers like Pringle Homes to continue raising the standard of design across the borough.	

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	NPPF paragraph 134, is for the Plan to positively encourage developer-led design codes and masterplans prepared in support of planning applications. Pringle Homes is a proactive developer that invests heavily in this "front-loaded" design process. 9.5. Our proposal					

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	for Greenlands Farm is a case in point. The submitted Design Concept Brochure and supporting plans effectively function as a site-specific masterplan. The scheme is guided by a landscape-led approach, weaving biodiversity into the fabric of the development with new ponds, green corridors, and					

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	public open space. The layout is designed to create a sense of place that respects the local context while delivering a range of high-quality homes to meet different needs. 9.6. The new Local Plan's policy should therefore set the high-level principles for strategic sites, with the detailed masterplanning					

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	parameters being delivered through developer-led documents, prepared collaboratively with the Council and consistent with the National Design Guide.					
PWA Planning	9.1. We strongly support the principle that high-quality design is a fundamental component of sustainable development, as	9.5. The primary focus should be on applying design standards across the entire borough through a robust, universally applicable design policy. While we do	9.6. We support the principle of using design codes, as encouraged by NPPF paragraph 133, as they can provide greater certainty and a clear framework for creating	9.8. A more efficient and collaborative approach, explicitly supported by NPPF paragraph 134, is for the Plan to positively encourage developer-led design codes prepared in support of planning applications for	9.9. The most important principle that must be embedded within the new Local Plan's approach to design is the need for flexibility, innovation, and the	Comments noted. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher

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	emphasised in Chapter 12 of the (NPPF). Good design creates better places, adds value, and helps to make development acceptable to communities. The new Local Plan should set out a clear, positive, and flexible framework for achieving high standards of design across the borough, one that provides certainty	not object in principle to identifying areas where specific design considerations apply (e.g., within Conservation Areas), this should be handled through supplementary guidance, such as design codes, rather than creating multiple, geographically-specific policies within the Local Plan itself.	"beautiful and distinctive places". They are a particularly useful tool for guiding the development of major strategic sites. 9.7. However, we agree with the consultation's implication that this is a resource-intensive process. Our support is therefore conditional. The Council must ensure it has the necessary resources and in-	strategic sites. This process ensures that masterplanning is a proactive and integral part of the development process. The new Local Plan's policy should therefore set the high-level principles for strategic sites, with the detailed masterplanning and design parameters being delivered through site-specific design codes that are prepared collaboratively and are consistent with the National Design Guide.	application of professional judgment. 9.10. While design codes and policies are valuable for setting a baseline of quality, they must never become a rigid, 'tick-box' straitjacket that stifles architectural creativity. The NPPF is clear on this point. Paragraph 139b gives "significant weight" to: "...outstanding or innovative designs which promote high levels of sustainability, or help	design quality for specific sites or areas. The Council has proceeded with a single policy (DSA1: Achieving Good Design in Development) covering all aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and

Respondent name	(51) Should the new plan have a single policy covering all elements of design or separate policies for layout, context, building form, landscaping, movement etc?	(52) Should the new Local Plan identify any areas where specific design considerations will apply (on a strategic basis)? If so, which areas and what specific considerations should be identified?	(53) Should the new Local Plan identify areas to be covered by design codes? If so, which areas should these be?	(53a) Do you have any comments on how the masterplanning of strategic sites should be undertaken, and how requirements for it should be reflected in the new plan?	(54) What further comments do you have on how the new Local Plan should address the issue of design?	Council Response
	for applicants while also encouraging innovation and architectural excellence. 9.2. We advocate for a single, comprehensive design policy within the new Local Plan. 9.3. A single, overarching policy provides a clear, coherent, and holistic framework for assessing development		house expertise to produce high-quality, enabling codes in a timely manner. Poorly resourced or delayed codes will create uncertainty and act as a barrier to development.		raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings." 9.11. The new Local Plan's design policy must explicitly include this provision. It must empower the Council to approve well-conceived, high-quality schemes that may not conform to every detail of a design guide but which represent genuine architectural	natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and supplementary planning documents. Policy DSA1 requires that all development should be accompanied by a design and access statement that

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	proposals. It allows applicants and decision-makers to consider all aspects of design in an integrated way, consistent with the ten characteristics set out in the National Design Guide. This approach facilitates the application of professional planning judgment in				quality and innovation. Page 34 The ultimate goal should be to encourage the best possible design for a site, not merely to ensure compliance with a set of pre-defined rules.	fully explains and justifies the design approach for the scheme. Additional design guidance is also signposted in the policy, making reference to design guides, design notes and Supplementary Planning Documents on design.

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	weighing the various elements of a scheme to arrive at a balanced decision on its overall design merit. 9.4. Conversely, creating separate, fragmented policies for individual elements such as layout, landscaping, and building form risks becoming overly prescriptive and can lead to					

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	conflicting requirements. This can stifle creativity, hinder the application of sound planning judgment, and create unnecessary complexity in the planning process, contrary to the NPPF's call for plans to be "succinct and up-to-date".					
Sport England					Given the importance attached in paragraph 3.2 of the consultation	Active travel is recognised in the Local Plan for

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					document to prioritising locations for development to promote healthy lifestyles and the importance attached to planning policies enabling and supporting healthy lives in paragraph 96 of the NPPF, when the Local Plan's design policies are reviewed it is requested that consideration be given to how the design of development can promote active lifestyles. Policies covering design	having significant health benefits. New development can encourage active travel by creating safe and connected routes, where large parts of the developed area in Fylde are suitable for active travel. Policy DSA1: Achieving Good Design in Development make provisions to encourage active travel

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					principles and masterplan requirements should require developments to demonstrate how they have been designed to encourage active lifestyles. Policies and reasoned justification can signpost to Sport England's Active Design guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design , that has been prepared jointly with	through design. This includes prioritising non-motorised users such as cyclists and pedestrians through design measures. All development proposals will need to show appropriate measures are provided to facilitate access on cycle or foot, encouraging the linking up and extension of routes projecting

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					Active Travel England and the Office for Health Improvement and Disparities. The guidance sets out how new developments can be planned that create the right environment to help people get more active. The guidance focuses on ten key principles for ensuring developments incorporate opportunities for people to take part in sport and physical activity such as walkable communities, multi-functional open	beyond the limits of a development site. Clear, well-lit pedestrian and cycle routes and high-quality public space that encourage the active and continual use of public areas which promote health and wellbeing are promoted in the policy. The needs of specific groups in the community such as the

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					space and active buildings. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design which is consistent with paragraphs 96 and 129 of the NPPF. To support the implementation of Local Plan policies in practice, the Active Design guidance includes a checklist that can be completed	elderly and individuals with disabilities should be fully provided for.

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					to assess individual schemes. Active Design also aligns with the Government's National Design Guide and National Model Design Code. In relation to design codes, Sport England's guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=design-code-guidance-section on Design Codes has been produced to help	

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					those drafting and responding to design codes by effectively embedding Active Design principles into the coding process and the guide follows the same structure of the National Model Design Code. It is requested that this be considered when policies covering design codes are considered.	
Steven Abbott Associates for Bradkirk Business Park	Not a single policy as that is too prescriptive. It would not take account of the		A general policy for all sites is unnecessary. These should apply to 'true' strategic sites		Seek high quality but do not thwart innovation or creativity	Comments noted. The Council has proceeded with a single policy covering all

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	different characteristics of the parts which make up the district. A Design section would be better. • separate policies for layout, context, building form, landscaping, movement etc? The methodology used by the National Design Code		only – where allocated e.g. if any are proposed for over a 1,000 homes and other land uses. Unnecessary delays to delivery will occur to delivering homes otherwise. Master plans can be negotiated on a site-by-site basis where necessary otherwise, but reputable housebuilders produce them for large sites anyway. We would be			aspects of design. This details the principles of good design including density, heritage impact, materials, massing, scale and layout. Impacts on the highway and natural environment are also considered in the design policy and provides a steer towards further design guidance such as design notes, design guides and

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			concerned whether the Council will be able to resource the negotiation and management of master plans district wide.			supplementary planning documents.
Turley for Strategic Land Group			Design Codes 1.38 The IVSD asks a question as to how the masterplanning of strategic sites should be undertaken and how it should be reflected in the Local Plan. 1.39 SLG consider	Design Codes 1.38 The IVSD asks a question as to how the masterplanning of strategic sites should be undertaken and how it should be reflected in the Local Plan. 1.39 SLG consider that any strategic site allocation policy should have a		Policy DSA1: Achieving Good Design in Development notes that where required, all development proposals should be accompanied by a Design and Access statement

Respondent name	(51) Should the new plan have a single policy covering all elements of design or separate policies for layout, context, building form, landscaping, movement etc?	(52) Should the new Local Plan identify any areas where specific design considerations will apply (on a strategic basis)? If so, which areas and what specific considerations should be identified?	(53) Should the new Local Plan identify areas to be covered by design codes? If so, which areas should these be?	(53a) Do you have any comments on how the masterplanning of strategic sites should be undertaken, and how requirements for it should be reflected in the new plan?	(54) What further comments do you have on how the new Local Plan should address the issue of design?	Council Response
			that any strategic site allocation policy should have a requirement for a masterplan to be prepared by the applicant alongside the submission of any planning application. This type of design document would provide sufficient visioning and detail as to what would be expected to be delivered. Any request however for the preparation of a	requirement for a masterplan to be prepared by the applicant alongside the submission of any planning application. This type of design document would provide sufficient visioning and detail as to what would be expected to be delivered. Any request however for the preparation of a Design Code should be avoided ahead of any planning application.		that fully explains and justifies the design approach for the scheme. The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas.

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			Design Code should be avoided ahead of any planning application.			
United Utilities		Yes we would recommend that areas with specific design considerations should be applied. This helps create policy certainty.	Yes we are supportive of design codes and masterplans especially in respect of strategic sites. The delivery of development and associated infrastructure should be delivered holistically and in a co-ordinated manner. This is addressed in our		We request that all design policies reflect the need for all development to be resilient to the challenge of climate change, which should be golden thread running through all local plan policies especially design policies. The design of public realm and urban spaces is an excellent	The Local Plan acknowledges the value of design codes and that these can be used to set out design principles, to strive for higher design quality for specific sites or areas. Under policy DSA1: Achieving Good Design in Development, the

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			supporting appendix.		opportunity to embrace sustainable water management principles. Policy must ensure that: 1) foul and surface water management are considered early in the design process; 2) that development sites make space for water and for the incorporation of multi-functional sustainable drainage systems; 3) any on-site landscaping is integrated with the strategy for surface	Local Plan requires development to consider measures to mitigate the effects of climate change by incorporating energy and water efficiency in new and existing buildings and grey water and rainwater harvesting. Development should be located away from those areas identified

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					water management; 4) any drainage system for public open space is designed with regard to the potential for future adjacent development sites to also discharge to any newly proposed drainage systems; and 5) opportunities are taken to liaise with Uuw to ascertain if there is any necessary upgrade / mains replacement that would be beneficial as part of the public realm / urban spaces work.	to be at risk of surface water flooding and so as not to impact upon future development, surface water flooding should be mitigated without resulting in the discharge of floodwater from the site. This is in combination with the requirements of policy CCH2: Surface Water Run-Off and Sustainable

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					We believe that site-specific policy has a critical role to play in driving sustainable approaches to surface water management. This policy can help create clear and unambiguous policy expectations for surface water management which drive a level playing field for developers operating in a competitive market. When compiling design policy and guidance, U UW would welcome	Drainage that necessitates that no surface water discharge to a combined sewer and that discharge should be reduced to greenfield run-off rates. Development must utilise SuDS wherever practical, where CCH2 lists the attenuation measures that must be incorporated in

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					the opportunity to engage with the council on the content. There are other matters that are critical to masterplanning a site including flood risk from all sources and utility infrastructure. In relation to residential additions, alterations and extensions, UUW wishes to highlight the need for sufficient space to be allowed for in the design of proposals to maximise the inclusion	any new development. The significance of green infrastructure in reducing flood risk is emphasized in policy CCH1: Flood Alleviation, Water Quality and Water Efficiency.

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					of sustainable drainage systems such as infiltration systems, water butts and to direct water to permeable surfaces wherever possible. It is critical that appropriate arrangements for sustainable drainage are considered early in the design process. For extensions and alterations, we also wish to highlight the importance of any development giving early consideration to	

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					utility assets passing through a site which could preclude the delivery of proposals.	

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Bryning with Warton Parish Council	Yes, Under maintenance contracts water run off ie ditches should also be installed and maintained. Any existing ditches/runoffs should also be protected.	Yes, I would also support the requirement for developers to plant one tree on each plot to support water absorbsion.	Comments noted, policy CCH2: Surface Water Run-Off and Sustainable Drainage requires surface water discharge to be attenuated through SUDS, this would be at greenfield run off rate on greenfield sites. The policy further requires new development to incorporate sequential attenuation measures, one of which being attenuating rainwater into ponds or open features, such as ditches, for gradual release into the watercourse. Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency acknowledges the benefits of green infrastructure to reduce the risk of flooding
David Chedd	Yes	The Council's approach needs reviewing. Various recent developments have been problematic where new houses have been	Comments noted.

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		built which now flood (Kirkham "triangle") or where the runoff has not been considered (Beech Road, Elswick resulting in the now permanent flooding and impassability of Meagles Lane).	
Emma Swindells	Yes. But it hasn't happened yet! New estate built and rural road next to it always floods which then makes the road surface degrade and pot holes emerge!	Yes	Comments noted.
Ethan Ellison	No, flexibility for mitigation and exceptional circumstances is required. But this should not be due to viability but due to practical and physical limitations that cannot be solved realistically, not just that they are expensive.	Yes	Comments noted.
Frank Andrews	yes	yes	Support noted.
Frank Andrews	yes	yes	Support noted.
Gerard Malone	Yes but..... we can also deal with surface water like at cypress point.	No. Too restrictive	Comments noted.
Hannah Dell'Armi	yes	yes	Support noted.
Irene Jacques	Yes	Yes.	Support noted.
John Leadbeater	Yes	No comment	Support noted.

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John Maskell	Yes	The Environment Agency should be held to account for local areas of flooding which are not being addressed	Support noted.
Keith McKay	If possible yes, if not, then there must be adequate capacity in the surface drainage system or SUDS.	Taking the vadose nature of the Fylde into consideration, there are still questions to be asked and solutions to be agreed.	Support noted.
Linda Nulty	Yes - in fact less runoff would help as many sites suffer from flooding issues to start with	Yes. Not giving permission on known flood areas e.g Wesham Marsh - the clue is in the name. I am sure the same applies in other areas	Support noted.
Lytham St Annes Civic Society	Yes	Yes	Support noted.
Marcus Dowling	Yes	Yes	Support noted.
Mrs B Wildish	yes		Support noted.
P Stanford	YES – why on earth wasn't this already the case ! Should have a % increase/ overhead estimate due to inability to soak away due to concrete and tarmac	Developers just try to baffle you with stats and predictions .. just to get their permissions ! I've seen the most recent one for various site in K&W ... I almost fell off my chair when reading. You can predict and plan all you want – unless you listen to local longstanding residents who	Comments noted.

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		know where floods and does not – then flooding will be an issue. In K&W YOU have allowed sites to be developed where I would NEVER move to – (as I paddled / “swam” / even canoed as a kid in many of those fields when they flooded) – there were a ticking time bomb – not if – but when ! So residents buy in good faith – and have little come back WHEN it happens – IMHO, Planning committee is almost complicit in the blame ! (might suggest that part of issue is planning team might not be long standing residents with that knowledge ? or even live on the Fylde ?)	
Stephen and Jacqueline Croft	Yes. The Fylde is generally a low-lying area and close to the coast. Many developments, particularly those in Wrea Green (Langtons, Richmond Avenue extension are examples) have caused significant flooding issues and water-logging of properties surrounding them. The Redrow homes development (North View Fold) in Wrea Green also included the covering up of an open ditch which was a major water run-off collection 'avenue' and	Yes. Generally speaking the flood risk is not "on the developmenet site", but affects those living around the new development. Far better to consider all the flood risks, since people won't want to live in the houses if they flood - so that is just a waste (a good example here is the developments across from The	Comments noted.

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	this has also contributed to the flooding around Ribby Road.	Buraq restaurant which were built on known low-lying land	
Steven Abbott	Yes	Yes	Support noted.
Environment Agency	While we are no longer a statutory consultee on the surface water aspects of development proposals, we retain a strategic overview role to Local Planning authorities. We support the strategic management of surface water and we understand that any potential increase in run-off from new development can add pressure to already struggling infrastructure. The ability of existing infrastructure (roads, sewers, drains) to cope with surface water runoff rates needs to be considered through the planning process and the use of sustainable drainage systems (SuDS) can help manage these risks. We fully support and endorse the new National standards for sustainable drainage systems updated 30 July 2025. We would direct our strategic advice to the adoption of these standards and principles. https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds The SuDS Manual - Ciria C697 makes it clear that the stages of the natural water cycle can be impeded when land is altered by development. In urban areas, there tends to be less permeable ground available for infiltration and less vegetation for evapotranspiration.	We would wish to reiterate the importance of avoiding development in areas within the wider floodplain wherever possible and not just avoidance of sites within Flood Zone 3. This should help to make settlement areas more resilient to the increased flooding risk in the future as a result of climate change. New development must ensure that there is no increase in flood risk as a result of any proposals. Developments must take into account all sources of flooding. There needs to be a focus on surface water management across the catchment, not just on a site-by-site basis. The local plan should detail how flood risk from all sources, fluvial, tidal and surface water, will be managed. Section 9 (Climate Change, Renewable Energy and Flood Risk) of the Options, Issues, Vision and Scope document (OIVS) includes a sub section on Flood Risk. Points 9.5-9.10 covers some aspects we would expect to see when assessing flood risk at a high level in respect of site selection considering all sources of flood	Comments noted, it is expected that new development will attenuate surface level discharge through SuDS equal to the greenfield run-off rate (policy CCH2: Surface Water Run-Off and Sustainable Drainage). SuDS must be utilised in new development wherever possible, including retrofitting SuDS in areas where there is a high degree of surface water runoff. The Local Plan seeks to maximise the potential of the green infrastructure network to reduce the risk of flooding. Development must incorporate the most sustainable form of managing surface water but in all cases no surface water

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	When rain falls on impermeable surfaces, much more of it turns into surface water runoff, which can cause flooding, pollution and erosion problems. Research shows that, if we don't change the way that we design our urban areas and manage surface water runoff more effectively, these problems are going to get worse. Climate change projections show it is likely that heavy rainfall and flooding will become more frequent and continuing to provide new sewer capacity to cope with these growing risks is unaffordable. SuDS if planned in isolation without ongoing maintenance plans can fail to provide the water storage needed and fail to provide additional benefits such as habitat and carbon sequestration. SuDS provisions would ideally be required to be multi-functional, above ground green solutions which deliver additional functional habitats that strengthen the ecological functionality of the existing blue and green infrastructure, and that help to slow the flow. There should be an assumption that underground storage and oversized pipes are not sustainable drainage systems and the use of prefabricated systems such as this will not be acceptable unless the applicant can submit information to demonstrate why not. The use of SuDS can provide biodiversity and environmental net gains and can contribute well to mandatory biodiversity net gain requirements which should also provide incentive for developers to use natural SuDS as opposed to the	risk. As stated in section 171 of the National Planning & Policy Framework (NPPF), strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. New / updated policies should use the level 1 SFRA dated June 2024 to inform these policies. All sources of flood risk must be considered in a Flood Risk Assessment (as stated in NPPG). There should be no increase in flood risk elsewhere as a result of development proposed in areas of flood risk. To ensure that you are selecting sites appropriately by considering all sources of flood risk it is essential to have an up to date understanding of flood risk and the constraints of each area. In any revised / new plan we would be fully supportive of site-specific flood risk policies in relation to site allocations. Conducting a Level 2 SFRA would help to inform flood risk policies.	drainage will be permitted to a combined sewer. The Local Plan supports the development and enhancement of the sea defences and that any new defences and coastal protection measures are of an appropriate design and fit for purpose. With regards to future flood risk, in considering sites submitted for allocation through the call for sites process the Level 1 Fylde Coast Strategic Flood Risk Assessment (SFRA) was used to determine the current and projected future flood risk to 2070. The level 2 SFRA is currently being prepared and will detail the nature of flooding from all sources. Both the Level 1 and Level 2 Strategic Flood Risk Assessments take

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	underground tanks. Further comments Para 9.5 - Section 9.5 states that the existing local plan will follow the sequential risk-based approach to the location of development taking into account all sources of flood risk. However, it doesn't specifically state that this should also consider the current and future impacts of climate change on development sites. This is essential for ensuring that a development will stay safe for its lifetime and will not increase flood risk elsewhere, which is essential for site selection and in line with section 172 of the NPPF. Para 9.6 - Your Level 1 SFRA dated June 2024 assesses all forms of flood risk and presents the conclusions within the document. The Local Plan should include reference to the information developed within the L1 SFRA. A L1 SFRA as described in OIVS Section 9.6 is a starting point for presenting the flood risk issues requiring consideration in the Local Plan area and across boundaries study areas. The Environment Agency welcomes input and consultation on a Level 2 SFRA. This would provide the specific evidence needed for potential development sites, helping to inform the Sequential Test and provide guidance for the Exception Test if development is proposed in a flood risk area. It is important to note that New National Modelling was		climate change into account. The guidance on flooding and surface water runoff in the Local Plan is based on the national hierarchy for surface water run-off discharge as referenced in PPG and the Fylde Council Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD. Planning decisions are to follow the sequential, risk based approach to the location of development as required in the NPPF. New development must minimise flood risk on the environment and mitigate the likely effects of climate change both on present and future generations.

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	released in March 2025 resulting in changes to the Flood Risk maps. This should be taken into account within the Local Plan updates when referencing the L1 SFRA. Para 9.7 - In section 9.7 you have stated only small areas within the Local Plan are impacted by tidal flood risk. It is important to consider how aspects such as sea level rise as a result of climate change may impact the area in the future. There is also the consideration that sea defences will require renewal during the plan period in order to raise the sea defences to protect areas vulnerable to coastal flooding. This should be considered within the Local Plan. There are also challenges in the borough where areas at risk from flooding have a pumping station to control drainage, such as Red Bridge Pumping Station at Cropper Road. Resilience of a site should be considered in the case of pump failure and how this would be managed. The existing CL1 strategic policy incorporates Flood Alleviation, Water Quality and Water Efficiency as one policy. We would advise that a separate Flood Risk Policy is included in any revised / new plan to ensure the existing policy is expanded to fully include consideration of tidal and fluvial flood risk – including increased peak rainfall, peak river flow and sea level rise as a result of climate change. Para 9.9 - When considering sites vulnerable to flooding		

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	the Local Plan should consider how Natural Flood Management (NFM) can be used to reduce flood risk to a site. NFM can take many different forms and can be applied at different scales in urban and rural areas by altering the ways habitats, land, rivers, estuaries and the coast are managed. Fylde council can play an active role in NFM by including information that recognises and endorses the above co-benefits in their local plan and policies preparation. This can be achieved by developing specific policies and plans and working with us, the LLFA and other stakeholders to recognise the desires and opportunities for reducing flood risk, and viable options that NFM measures may present by working with natural processes across the landscape to deliver and perform one or more of the primary functions relating to flood risk management be it increasing infiltration, slowing the flow of water, storing water and holding back sediment. It is recognised that NFM can also perform secondary functions to provide co-benefits such as habitat creation and biodiversity enhancement, soil improvement and retention, water quality improvements and carbon storage, and can create more valuable landscapes leading to recreation or tourism opportunities for the local and wider community. Equally, other initiatives, which have their primary objectives outside of flood risk management, can also provide a secondary co-benefit (e.g. biodiversity-driven projects can help reduce flood		

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	risk). Your SFRA L1 provides some guidance on Compensatory Flood Storage. Guidance should make it clear that Floodplain compensatory storage must not be used as a reason for developers or planning authorities to advocate floodplain development where lower risk alternatives are available. Where this may be necessary and unavoidable it should be accordance with the guidance: - CIRIA 624 (Development and flood risk – guidance for the construction industry - Section A.3.3.10, 2004) states that: "Compensatory flood storage must become effective at the same point in a flood event as the lost storage would have done (McPherson 2002). It should therefore provide the same volume and be at the same level relative to flood level, as the lost storage". Finally, while fully anticipating that any sites allocated for development should avoid areas of high flood risk, it should be understood that development, and in particular the disposal of surface water from development, can impact on the receiving watercourses and lower lying areas at flood risk downstream. Major developments located in Flood Zone 1 can cause significant concerns from the public in relation to the perception of increasing flood risk elsewhere, and in some instances these concerns have been seen to be justified because of increased base and peak pass on flows which puts small watercourse and especially		

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	culverted systems under significant development pressures. As you are aware we are no longer a statutory consultee on the surface water aspects of development proposals. Providing detailed comments on the drainage strategy is not within our remit and we are not resourced to provide this service as part of our Flood and Coastal Risk Management function. Notwithstanding this, if it is apparent, or later becomes apparent that there is potential for surface water to have an impact, we could raise this with you as part of our strategic overview role to Local Planning authorities. With reference to our response to question 55, we would direct our strategic advice to the adoption of the standards and principles of the new National standards for sustainable drainage systems (SuDS) Updated 30 July 2025, sets out 11 key principles, which has been strengthened for the benefit of net gains for nature or other multifunctional benefits as described. Para 9.10 If developers are proposing to discharge surface water to watercourses, they will have to ensure that flood risk will not be increased elsewhere. Please note that since this is such a broad statement to 'add any further comments you have on the impact of flood risk on development sites', our comments are not inclusive of every aspect of flood risk that should be considered		

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	when assessing the impact of flood risk to proposed sites.		
DLP Planning for BAE Systems	Flood Risk Whilst BAE Systems would not object to the emerging Local Plan containing an aim that development does not increase runoff above greenfield rates, it should not be an absolute requirement. Increases in runoff rates above greenfield rates should be allowed where a development is supported by a flood risk assessment that demonstrates that an increase in runoff rates above greenfield rates would not increase flood risk to the site or areas off-site. In such instances, increasing runoff rates would not result in harm and therefore development should not be restricted.		Comment noted. In the Local Plan development is required to reduce discharge to greenfield runoff rates and retrofitting SuDS in areas generating surface water runoff is encouraged. Mitigation can be advantageous in areas of low flood risk and high flood risk can be managed by locating new development away from these areas.
Gladman	4.7.1 Gladman supports the implementation of an absolute requirement that all development sites result in no greater surface water run-off post-development than in their greenfield state. This approach is in line with national planning policy that seeks to not increase flood risk elsewhere. As such, this requirement is essential for promoting sustainable development across the borough. The Council's approach to drainage and flood risk should be informed by the most up-to-date guidance set out in the NPPF and PPG and the new National Standards for Sustainable Drainage Systems.	4.7.2 Gladman supports the Council's approach to site selection considering all sources of flood risk. This approach is in accordance with national planning policy. In applying the sequential test and subsequently allocating sites for development, the Council should be informed by the most up-to-date guidance set out in the NPPF and PPG. The Council should also consider that the sequential approach to the location of development should be adopted by applicants	Comments noted.

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		within the application boundary and recognise that it is possible to address the forms of flood risk through careful site design and layout decisions.	
Historic England	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting.	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting.	Comments noted.
Home Builders Federation	Climate Change, Renewable Energy and Flood Risk Flood Risk 38. In formulating policies for managing drainage and flood risk, the Council should ensure that these are based on robust evidence and are in line with the latest updates made to the PPG on 17 September 2025 and the latest guidance on Sustainable Drainage Systems (SuDS) (July 2025).		The guidance on flooding and surface water runoff in the Local Plan is based on the national hierarchy for surface water run-off discharge as referenced in PPG and the Fylde Council Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD. Planning decisions are to follow the sequential, risk-based approach to the location of development as required in the NPPF.

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Lichfields for Taylor Wimpey	Flood Risk Taylor Wimpy is supportive of this objective and already meets this standard as part of its developments in accordance with the National Standards for Sustainable Drainage Systems (SuDS).		Support noted.
National Highways	Q55. WSP recommend that National Highways support the requirement to minimise negative impacts to the water drainage system, as per page 50 of the NPPF, reducing the requirement for reactive maintenance when flooding events occur, which may impact the motorway network.	Q56. WSP suggest that National Highways should support FBC's approach to site selection considering all sources of flood risk. The council should ensure that if areas are selected where amendments to the SRN are required/proposed, National Highways should work with FBC to ensure impacts to the sustainable drainage systems are appropriately managed and not impact on National Highways assets.	Support noted.
Network Rail		Drainage proposals and Network Rail land The NPPF states: "178. Planning policies and decisions should ensure that: a) A site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability." And "163. When determining planning applications, local planning authorities should	Comments noted. New developments must reduce surface water discharge to greenfield run off rates. This will ensure minimal impact on the railway network if runoff is equal to that of the site prior to development. No surface water drainage is

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		ensure flood risk is not increased elsewhere." In order to comply with the NPPF, developments must ensure that the proposal drainage does not increase Network Rail's liability, or cause flooding pollution or soil slippage, vegetation or boundary issues on railway land. Therefore, the proposed drainage on site will include the following: • All surface waters and foul waters must drain away from the direction of the railway boundary. • Soakaways for proposals must be placed at least 30m from the railway boundary and at least 50m from railway tunnels (subject to Network Rail agreement). • Any drainage proposals for less than 30m from the railway boundary must ensure that surface and foul waters are carried from site in closed sealed pipe systems. • Suitable drainage or other works must be provided and maintained by the developer to prevent surface water flows or run-off onto Network Rail's land and infrastructure. • Proper provision must be made to accept and continue drainage discharging from Network Rail's property. • Drainage works must not impact upon	to go into a combined sewer.

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		culverts, including culverts/brooks etc that drain under the railway. Developers will not be permitted to direct surface or foul waters into culverts which run under the railway – any discharge of surface water under the railway via a culvert will require review and agreement from Network Rail who reserve the right to refuse use of any culverts. • Developers must ensure that there is no surface or sub-surface flow of water towards the operational railway. • Rainwater goods must not discharge in the direction of the railway or onto or over the railway boundary. • Consideration of the impacts upon railway drainage of Astro-Turf/plastic lawn replacements, both during construction and any future inclusion of said Astro-turf by residents going forward. NB: Soakaways can materially affect the strength of soil leading to stability issues. A large mass of water wetting the environment can soften the ground, and a build-up of water can lead to issues with the stability of Network Rail retaining walls/structures and the railway boundary. Network Rail does not accept the installation of soakaways behind any retaining	

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		structures as this significantly increases the risk of failure and subsequent risk to the travelling public. If developers and the council insists upon a sustainable drainage and flooding system then the issue and responsibility of flooding, water saturation and stability issues should not be passed onto Network Rail. We recognise that councils are looking to proposals that are sustainable, however, we would remind the council that flooding, drainage, surface and foul water management risks as well as stability issues should not be passed 'elsewhere', i.e. on to Network Rail land. All drainage proposals are to be agreed with Network Rail. The HSE identifies railways as a Major Hazard Industry. An earthwork failure within a high-hazard area has the potential to result in a catastrophic accident with multiple fatalities or long-lasting environmental issues. It should be noted that where the actions of an adjacent landowner have caused a landslide on the railway the loss adjusters are likely to advise recovery of Network Rail costs from the 3rd	

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		party, which would include costs of remediation and recovery of costs to train operators. Many railway earthworks were constructed in the Victorian period and are susceptible to failure by water saturation. Water saturation leads to an increase in pore water pressure within the earthwork material. Please also note that railways, and former railway land adjacent to it, is considered as contaminated land due to historic use of railways, which can affect the suitability of infiltration drainage. The Council must ensure that suitable arrangements are in place for the maintenance and renewal of all new/amended drainage for the life time of the development, to mitigate risk of flooding to any adjoining land. New detention ponds or increased discharge to a detention pond adjacent to the railway would not be acceptable due to the risk of destabilising earthworks due to potential for softening of the railway embankment, and due to the increased risk of causing flooding to the railway. Attenuation basins or ponds must not be positioned in developments where the development is adjacent to a cutting.	

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		Developers are advised that prior to the submission of a planning application that they contact the Network Rail asset protection team in the first instance with details of their proposals for surface water mitigation for review and agreement. No surface water works are to commence until agreed with Network Rail.	
Newton With Clifton Parish Council		b) New residential developments i) A prevailing perception of members is that sometimes planning permission is granted, particularly for residential development, without the required improvements or installation of necessary infrastructure, drainage being specifically cited as an example. Members are increasingly concerned about the capacity of existing waste water and foul water infrastructure to handle the added load from new developments. The addition of new homes to an already inadequate system can lead to flooding, ponding and other drainage issues for both new and existing residents. While central government is moving towards making sustainable drainage systems (SuDS) mandatory for new developments, the implementation process is ongoing, and it is	The Local Plan details the sequential attenuation measures that must be incorporated into new developments, including storing rainwater for later use and then requiring the first 5mm of rainfall to infiltrate. Rainwater should be attenuated in ponds or open features or by storing in tanks/sealed water features for gradual release into a watercourse. Development must utilise SuDS wherever practical and reduce discharge to

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		considered that the local planning authority should refuse permission, or delay projects, based on any concerns about the capacity of local foul water and waste water infrastructure, even if utility companies have not reported any problems. While the government has pledged to make SuDS mandatory for new developments, the implementation of Schedule 3 of the Flood and Water Management Act 2010 has been slow, and there is still a gap between policy and practice. Prevailing issues with existing systems, developer delays in providing drainage, and a lag in legal and regulatory enforcement compound the problems associated in achieving new residential development targets. contd... This leads to situations where new homes cannot be occupied, due to a lack of a functional drainage connection, and existing residents may experience flooding etc as a result of overloaded systems as a consequence of new development adding pressure to older systems.	greenfield runoff rates, whereby no surface water drainage will be permitted to a combined sewer. The guidance on flooding and surface water runoff in the Local Plan is based on the national hierarchy for surface water run-off discharge as referenced in PPG and the Fylde Council Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD.

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NHS Property Services		There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we would welcome the inclusion of a comprehensive policy on health and wellbeing in the Local Plan and encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared. Specific policy requirements to promote healthy developments should include: • Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design.	Comments noted. The Local Plan requires SuDS to be used wherever practical and proposals will require a feasibility assessment for the use of SuDS including consideration of the potential design of any scheme and ongoing maintenance arrangements.

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Pegasus Group for Rowland Homes	6.7. Any policies relating to drainage and flood risk, should be based on robust evidence and be in line with the latest updates made to the PPG on 17 September 2025 and the latest guidance on Sustainable Drainage Systems (SuDS) (July 2025).		The guidance on flooding and surface water runoff in the Local Plan is based on the national hierarchy for surface water run-off discharge as referenced in PPG and the Fylde Council Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD. Planning decisions are to follow the sequential, risk based approach to the location of development as required in the NPPF.
PWA Planning for Medicom	10.1. We are committed to ensuring that any future development at School Farm is resilient, sustainable, and responds positively to the challenges of climate change. For a low-lying borough like Fylde, this means taking a responsible and evidence-led approach to flood risk while supporting the transition to a low-carbon future. 10.2. Yes, we support this requirement. A clear and consistent policy on surface water management provides certainty for landowners and	10.3. Yes, we support an evidence-led approach to site selection, and our promotion of the School Farm site is a clear demonstration of this principle in action. 10.4. We acknowledge that parts of the wider landholding at School Farm fall within Flood Zones 2 and 3. In full accordance with the sequential, risk-based approach of the National Planning	Support noted.

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	developers and is essential for managing flood risk across the borough. We are confident that a well-designed scheme at School Farm can meet this standard through the incorporation of modern Sustainable Drainage Systems (SuDS).	Policy Framework (NPPF), our promotion of the site is focused on developing the substantial portion of the site that lies within Flood Zone 1. 10.5. This proactive, design-led approach, which steers vulnerable development away from areas at risk, effectively mitigates the flood risk constraint from the outset. It demonstrates that the site is a suitable and sustainable location for new homes. This removes the need for a sequential test for the proposed developable area and makes School Farm a significantly more certain and deliverable option for the Council to consider for allocation compared to sites where flood risk has not been so carefully addressed.	
PWA Planning for Pringle Homes	10.1. Pringle Homes is committed to building sustainable, resilient communities that are designed to mitigate and adapt to the effects of climate change. For a low-lying borough like Fylde, this means taking a proactive and responsible approach to both flood risk management and the transition to a low-carbon future. Our proposal for Greenlands Farm, Wrea Green,	10.4. development locations and allow for appropriate densities to be achieved across more of a site area. This will be essential if the Council is to meet its increased housing requirement. Yes, we support an evidence-led approach, but it must be based on the best and most detailed information available.	Comments noted, the Local Plan details that Fylde is a low-lying borough that make it prone to surface water flooding. It is advantageous for developments to incorporate green and blue

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	has been designed with these principles at its core. 10.2. Yes, we strongly support this requirement. This approach provides clear and consistent guidance for developers and is a cornerstone of responsible water management. Pringle Homes believes that new development should be part of the solution to local drainage challenges. 10.3. Our proposal for Greenlands Farm exemplifies this. The site is located in Flood Zone 1, representing the lowest risk of fluvial or coastal flooding. Furthermore, our landscape-led concept incorporates multiple new ponds and sustainable drainage systems (SuDS) to manage surface water effectively on-site. By redeveloping the area of hardstanding associated with the derelict piggery buildings, the scheme offers the potential to deliver an overall betterment in surface water management compared to the existing situation.	Page 29 10.5. It is crucial that the Level 2 Strategic Flood Risk Assessment (SFRA) is progressed as a matter of urgency. High-level flood mapping can be a blunt instrument that fails to reflect the reality on the ground. As stated in our Call for Sites submission, while some minimal areas of surface water flood risk are present at Greenlands Farm, a detailed assessment will demonstrate that these can be comprehensively managed through good design and engineering. A granular Level 2 SFRA will provide the detailed evidence needed to confirm the suitability of sustainable sites like ours and prevent them from being unfairly constrained.	infrastructure as part of the SuDS network and reducing the amount of hardstanding can assist with rainfall infiltration.
PWA Planning	10.1. Addressing climate change is a core principle of the planning system. For a low-lying coastal borough like Fylde, this means robustly managing flood risk while proactively supporting the transition to a low-carbon future through renewable energy generation. The new Local Plan must contain policies that are both effective in	10.4. Yes, we support the principle of considering all sources of flood risk, but this must be done using the most up-to-date, best available evidence and in line with recent national guidance, which recognises that risk can be effectively	Comments noted, the Local Plan details that Fylde is a low-lying borough that make it prone to surface water flooding.

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	creating resilient development and positive in enabling the essential infrastructure needed to combat the climate crisis. 10.2. Yes, we strongly support this requirement. This is a critical issue for the borough, and adopting such a policy would be a positive and responsible step. For the development industry, providing certainty through a clear and absolute requirement is preferable to ambiguity. 10.3. Furthermore, demonstrating that new development will lead to a betterment in drainage conditions is a powerful tool for building public confidence. When local communities can see that new housing will help to solve, rather than exacerbate, existing drainage problems, it can significantly reduce resistance to planning applications and new site allocations. This proactive approach to water management is a cornerstone of sustainable development and ultimately facilitates, rather than hinders, housing delivery.	mitigated. 10.5. The Council's approach must be evidence-led and proportionate. It is crucial that the Level 2 Strategic Flood Risk Assessment (SFRA) is progressed as a matter of urgency. The current, Page 36 high-level flood mapping often acts as a blunt instrument, sterilising land that, with appropriate design and mitigation, is perfectly suitable for development. We have direct experience of sites shown on mapping to be at high risk, where the reality on the ground is far less severe. 10.6. Recent updates to the PPG reinforce the point that flood risk, particularly from surface water, is often a design and engineering challenge, not an absolute barrier to development. Good design can mitigate and manage this risk effectively. The PPG also provides greater flexibility on the application of the sequential test, particularly for coastal communities where flood risk zones can cover extensive areas. 10.7. A granular Level 2 SFRA will provide the detailed evidence needed to unlock	Policy CCH2 encourages betterment of in drainage conditions by both encouraging the take up of SuDS and also requiring new development to reduce discharge to greenfield run-off rates. This ensures no additional runoff is created from new development. The Fylde Coast authorities level 1 Strategic Flood Risk Assessment (SFRA) was produced in 2024 and identifies flood risk from all types of flooding across Fylde. A level 2 SFRA has been commissioned to support the Local Plan to identify flood risk. Policy CCH2 acknowledges that surface water runoff is something that must be managed and provides sequential attenuation measures that must be incorporated into new

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		sustainable development locations and allow for appropriate densities to be achieved across more of a site area. This will be essential if the Council is to meet its increased housing requirement.	development. CCH2 details that the design of a scheme can affect surface water runoff and sustainable drainage, reflecting PPG.
Steven Abbott Associates for Bradkirk Business Park	Yes	Yes	Support noted.
United Utilities	Yes. UUW would be supportive of such an approach. We recommend that any approach that goes beyond the National Standards for SuDS would need to be carefully justified with clear evidence in the associated Strategic Flood Risk Assessment (SFRA). In relation to the SFRA, we would welcome the opportunity to liaise with you in more detail. A key element of managing flood risk and the impact on the water environment, is the sustainable management of surface water. UUW wishes to emphasise the importance of avoiding the discharge of surface water to the public sewer wherever possible. Surface water flows are much larger than foul flows and therefore have the greatest impact on the public sewer. Importantly the discharge of surface water to the public combined sewer increases	Yes. This is a critical component of national policy. Not having regard to all sources of flood risk in the site selection process would result in a local plan which is not consistent with national policy, which would not meet the soundness test. We have provided additional specific commentary on the need to have regard to all sources of flood risk in our supporting information. UUW requests that the local plan sets out more detailed policies on flood risk and water efficiency. Flood risk policies should consider all sources of flood risk. This should include sewer and reservoir flooding. Each site will need to be assessed to determine whether there is flood risk from these sources. If a site is allocated with a level	Support noted. The New Local Plan to 2042 details that no surface water drainage into a combined sewer is permitted and instead, where agreed with the environment agency or lead local flood authority as applicable, it should be directed to a surface water drain (policy CCH2). Surface water management is integral to the climate change section of the Local Plan, predominantly policy CCH2: Surface Water Runoff

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	the likelihood of sewers spilling into local watercourses, which has consequential impacts on water quality. A critical component of managing surface water on new development sites is the inclusion of multi-functional sustainable drainage. We have provided further commentary on our recommended approach to foul and surface water management and why this is critically important to U UW in the enclosed supporting information. Climate Change Policy U UW wishes to highlight its support for any climate change policy. Sustainable surface water management and the efficient use of water must be critical elements of any such policy. We also encourage the policy on climate change to be intrinsically linked to wider policies in the local plan including those relating to the detailed design of new developments and the provision of green and blue infrastructure. We are keen to ensure that any climate change policy gives appropriate emphasis to green and blue infrastructure, natural flood management techniques, multi-functional sustainable drainage, designing new development so that it is resilient to the challenges of future climate change and the incorporation of water supply efficiency measures.	of flood risk, we would request that the development of the site is governed by site-specific policy. This flood risk should also be identified in the SFRA. General Flood Risk When considering flood risk and the location of development, we believe it is important to highlight that the preparation of the local plan must give sufficient emphasis to all forms of flood risk. It will be important that any flood risk is referenced in your Strategic Flood Risk Assessment and fully understood as part of any development at the site. We recommend that any flood risk is better understood as soon as possible and prior to allocation so that the principle of development and the impact on any developable area can be confirmed. The NPPG defines flood risk as follows (the underlined sections identify our emphasis): What is "flood risk"? "Flood risk" is a combination of the probability and the potential consequences of flooding. Areas at risk of flooding are those at risk of flooding from any source, now or in the future. Sources include rivers and the sea, direct rainfall on the ground surface, rising	and Sustainable Drainage. Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency is more specific with regards to the use of green and blue infrastructure in managing water. The new Local Plan recognises the importance of green infrastructure in that developments should maximise the potential of green infrastructure to reduce the risk of flooding. Additionally, any development should incorporate the most sustainable form of managing surface water. The consideration of SuDS in the design of a scheme should be discussed in a feasibility assessment. Local Plan Policy CCH1 details that planning decisions should follow the

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	As the LPA will be aware, green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue infrastructure and landscape provision play an important role in managing water close to its source. If the necessary link between green/blue infrastructure, surface water management and landscape design is outlined as a strategic requirement, it will help ensure that sustainable surface water management is at the forefront of the design process. Landscaping We wish to emphasise that the evaluation of surface water management opportunities should be undertaken early in the design process. It is imperative that the approach to design including site analysis is intrinsically linked to 'making space for water'. Sustainable surface water management will be particularly important to consider in the context of the requirement for new streets to be tree lined. It is a national policy requirement that new streets are tree lined as stated in paragraph 136 of the NPPF. Therefore, UUW wishes to recommend the following wording for inclusion within the Local Plan: Recommended Policy	groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources. Flood risk also accounts for the interactions between these different sources. This term is key to the application of the presumption in favour of sustainable development in paragraph 11 of the National Planning Policy Framework. For areas at risk of river and sea flooding, this is principally land within Flood Zones 2 and 3 or where a Strategic Flood Risk Assessment shows it will be at risk of flooding in the future. It can also include an area within Flood Zone 1 which the Environment Agency has notified the local planning authority as having critical drainage problems. Table 1 provides definitions of the Flood Zones, from low to high probability of river and sea flooding. A map showing river and sea flooding is available from the Environment Agency's Flood Map for Planning. The Environment Agency has also set out who is responsible for flood and coastal erosion risk management in its National flood and coastal erosion risk management strategy. Government has also published a Flood and coastal erosion risk management policy	sequential risk-based approach to the location of development as per the NPPF and that new development must incorporate sequential attenuation measures. This includes storing rainwater for later use, attenuating rainwater in ponds or open features for gradual release into the watercourse or attenuating rainwater by storing it in tanks or sealed water features for gradual release into a watercourse. Developments should utilise SuDS wherever practical and must incorporate the most sustainable form of managing surface water, subject to the requirement for approval from the drainage authority. Surface water runoff should be reduced to greenfield rates.

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	Landscaping proposals must evaluate and identify opportunities for sustainable surface water management. Landscaping proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. We also support encouragement for water re-use opportunities in redevelopment proposals such as grey water recycling. Any approach to planting new trees must give due consideration to the impact on utility services noting the implications that can arise as a result of planting too close to utility services. This can result in root ingress, which in turn increases the risk of drainage system failure and increases flood risk. It will be important that applicants refer to our 'Standard Conditions for Works Adjacent to Pipelines' (a copy of which can be found on our website) and consult with us when implementing the delivery of landscaping proposals. The approach to any planting must have regard to the proximity to existing or proposed utility assets to ensure there is no impact on these assets such as root ingress. Trees should not be planted directly over water and wastewater assets or where excavation onto the asset would require removal of the tree. Groundwater Source Protection Zones	statement. Strategic flood risk assessments show all sources of flood risk, now and in the future. Paragraph: 001 Reference ID: 7-001-20220825 Having regard to the above definition, Paragraph 172 of the National Planning Policy Framework is clear that: 'All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.' When considering potential new development sites, it will be important to identify where there are existing public sewers within or near to the site, which are predicted to be at risk from flooding and/or sites where there is a record of previous flooding from the public sewer. We wish to note that we now have sewer flood risk modelling data which we can use to advise you on the risk of sewer flooding to potential site allocations. It is important that you have regard to this information in the preparation of your strategic flood risk assessments and in your site selection process	Additionally, policy ENT8: Landscape provides guidance on landscaping in the context of flood risk, where consideration should be given to how landscaping schemes will minimise surface water run-off rates. Flood risk is considered throughout the plan where the mitigation of flood risk starts in the design of schemes. Policy DSA1: Achieving Good Design in Development requires the layout of sites to recognise areas that are or will become affected by surface water flooding and plan for built development to be located away from such areas or otherwise mitigated without resulting from discharge of flood water from the site. This negates flood risk from the outset whereby

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	The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful. With respect to the site selection process, we wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance if there are SPZs in the local authority. The location of SPZs can be found on gov.uk and we request that you refer to these in your approach to site selection. The position of UUW is that when considering a range of sites to meet housing needs, it would be more appropriate to identify new development sites, which do not encroach on SPZ1.	and ensure that flood risk is avoided where possible. We would welcome the opportunity to liaise with you further on this matter as part of the site selection process. In addition, we recommend that you include the following wording in your flood risk policy. Recommended Policy The risk of flooding from any source must be considered. Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs. For sewers, the consultation must confirm: a) if there are any sewer surcharge levels at the point of connection that could influence site design; b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and c) if sewer modelling data indicates that existing sewers that pass through or near to	inappropriate development in Flood Risk Zones 2 and 3 will not be permitted. The approach to surface water discharge in the Local Plan is outlined in policy CCH2, whereby any discharge should be to a watercourse, or agreed with the Environment Agency or lead local flood authority in the case of discharging into a drain. It is necessary to attenuate any surface water discharge through SuDS and discharge rates should be agreed as part of any pre-application negotiations between the relevant parties. CCH1 supports the retrofitting of SuDS in locations generating surface water runoff and that flood risk impacts must be minimised by ensuring development incorporates

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	1 See Table 3 of Future Homes Hub Water Ready A report to inform HM Government's roadmap for water efficient new homes (April 2024) The preference of U UW would be to have a standalone policy in the local plan relating to water quality. Our recommended policy is below. Recommended Policy In consultation with the Council and relevant statutory bodies, applicants must consider the potential impacts on water quality resulting from the design, construction and operation of proposed development. Where necessary, development proposals must include measures to reduce any risk to the water environment and aim to protect and improve water quality. Development proposals within Groundwater Source Protection Zones must accord with the latest national guidance on Groundwater Protection. Applications for new development within Groundwater Source Protection Zones will be required to be supported by: i) A risk assessment and mitigation strategy; ii) Masterplanning which mitigates the risk to the water environment; and iii) A development management plan relating to construction and activities that will take place during the operation / lifecycle of any permitted development. Explanatory Text	the site present a modelled risk of sewer flooding. This information will help to inform whether to apply the sequential approach. Development must not be located in an area at risk of flooding. Applicants must demonstrate that proposals do not increase flood risk and are safe. Applicants must not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk. On-site Flood Risk When considering potential new development sites, it is important to identify where there are existing public sewers within or near to the site, which are predicted to be at risk from flooding and/or sites where there is a record of previous flooding from the public sewer. Proposals could also be affected by overland flows from nearby off-site public sewers. Policy should be clear that existing flood risk must not be displaced and that any flood risk needs to be considered early in the design process. This can be better understood once more	the most sustainable form of managing surface water in accordance with policy CCH2. The policy recognises the importance of the green infrastructure network within developments to reduce the risk of flooding and that its potential should be maximised. The Local plan does not feature a standalone policy for water quality but guidance is provided in policy CCH1: Flood Alleviation, Water Quality and Water Efficiency that requires all new development to retain water quality. It is recognised that the absence of flood risk at one site can increase flood risk elsewhere. Policy CCH1 also requires that new development must not adversely affect the quality

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	Any risk assessment will be expected to comprise a quantitative and qualitative risk assessment and mitigation strategy to manage the risk of pollution to public water supply and the groundwater / water environment. The risk assessment should be based on the source-pathway-receptor methodology and provide detailed information on ground conditions. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. Subject to the outcome of the risk assessment, the mitigation measures may include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features). It may also identify that the principle of development is not acceptable. Careful masterplanning will be required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be located so that it is closest to the boreholes in order to minimise the potential impact on groundwater. A development management plan will be required to identify the potential impacts from all activities related to the development both during construction and during the operational life of the proposal. The management plan shall address how activities on both	details become available on specific sites, for example, topographic information, which will inform where exceedance paths flow. The strong preference of UUW is for development to take place outside of any identified flood risk in accordance with the sequential approach. In instances where sites are affected by sewer flood risk and it is your decision to continue to allocate the site, we suggest the following additional site-specific policy wording for each site. Where there is a modelled flood risk, we would recommend the following wording: Recommended Policy Modelled Sewer Flood Risk Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.	of surface and groundwater resources in Source Protection Zones and where possible contributes towards improving it. This recognises the critical importance of protecting groundwater sources which, as mentioned, are commonly used for drinking water supplies. CCH1 seeks to improve water efficiency standards by minimising the use of portable mains water in new development and incorporating measures to recycle and conserve water resources. Comments on adopting a tighter water efficiency standard are acknowledged, where the current building regulations prescribe a water efficiency standard of 125L/Person/Day for all new dwellings. It is difficult from

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	groundwater, public water supply and surface water will be managed through the identification and implementation of appropriate mitigation measures necessary to protect and prevent pollution of these waters. For example, an appropriate management regime may be required for open space features in a groundwater source protection zone. In the event that sites are allocated in a SPZ, we request site-specific policy that identifies the constraint and the need for development to be appropriately mitigated / managed. Water Catchment Land Development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. Please get in touch to confirm if there is any water catchment land in your administrative area. In cases of wind energy proposals on water catchment land, the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and	Where there is a record of flooding on-site, or in the vicinity of the site, we would recommend the following wording: Recommended Policy Sewer Flooding Incidents There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design. We also recommend the following explanatory text in respect of sewer flood risk matters: Explanatory Text A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants must consider site topography and any exceedance flow paths.	a viability perspective to adopt the optional, tighter requirement of 110/L/Person/Day on new residential developments given the abundance of water across Fylde borough. Water scarcity is not an issue and there is no justification for adopting the tighter water efficiency standards. With regards to future flood risk, in considering sites submitted for allocation through the call for sites process the Level 1 Fylde Coast Strategic Flood Risk Assessment (SFRA) was used to determine the current and projected future flood risk to 2070. The level 2 SFRA is currently being prepared and will detail the nature of flooding from all sources.

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	inclusion of mitigation measures in the design and construction process. It is particularly important to avoid the location of new wind turbines on deep peat land. We recommend you include the following policy relating to water catchment land. Recommended Policy Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are located on catchment land used for public water supply, careful consideration must be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures including a management plan. For any site-specific allocations that you may identify which fall in such locations, such as renewable energy sites, it will be important that adequate information is presented to justify the principle of the development in advance of allocation and that the proposal is covered by site-specific policy which clearly identifies this constraint and the need for proposals to be undertaken in accordance with the above recommended policy.	Resultant layouts and levels must take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants must not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.' Reservoir Flooding	The guidance on flooding and surface water runoff in the Local Plan is based on the national hierarchy for surface water run-off discharge as referenced in PPG and the Fylde Council Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD.

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		Reservoirs have their own reservoir flood zone showing how far flood water would spread from the reservoir in the unlikely event that a reservoir failed. In your site selection process, you should have regard to this risk. In the event that your local authority is affected by reservoir flood risk, we would request the opportunity to liaise with you regarding any sites that are downstream of reservoir flood risk so that they can be appropriately considered against the above guidance. When looking at possible future development allocations within a reservoir flood zone, we draw your attention to the advice within the National Planning Practice Guidance on Flood Risk and Coastal Change. This states that the local planning authority will need to evaluate the potential damage to buildings or loss of life in the event of dam failure, compared to other risks, when considering development downstream of a reservoir. We have extracted some relevant paragraphs below. What emergency planning considerations are there in relation to reservoirs? The failure of a reservoir has the potential to cause catastrophic damage due to the sudden release of large volumes of water. The local	

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		planning authority will need to evaluate the potential damage to buildings or loss of life in the event of dam failure, compared to other risks, when considering development downstream of a reservoir. Local planning authorities are also advised to consult with the owners/operators of raised reservoirs, to establish constraints upon safe development. Local planning authorities should also consider any implications for reservoir safety and reservoir owners and operators caused by new development located downstream of a reservoir, such as the cost of measures to improve the design of the dam to reduce flood risk, the operation of the reservoir, and general maintenance costs, by consulting with reservoir owners and operators on plan and development proposals. Local authorities, as category 1 responders, can access more information about reservoir risk and reservoir owners using the Resilience Direct system. Developers should be expected to cover any additional costs incurred, as required by the National Planning Policy Framework's 'agent of change' policy (paragraph 200). This could be through Community Infrastructure Levy or section 106 obligations for example.	

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		Applications will need to include any evidence Local Planning Authorities need to understand the impact of individual developments on reservoirs. In doing so, they need to refer to relevant guidance in the Institution of Civil Engineers publication 'Floods and Reservoir Safety' (4th edition) and the Environment Agency's 'Guide to risk assessment for reservoir safety management'. It may be necessary to seek expert advice such as from an All Reservoirs Panel Engineer from the government accredited list under 'How to appoint a panel engineer'. Consideration should also be given to the potential impacts of development on the operation of reservoirs. This is particularly important where impacts could affect the management of flood risk or the supply of water. Paragraph: 046 Reference ID: 7-046-20220825 Revision date: 25 08 2022 Local planning authorities will need to evaluate in the Strategic Flood Risk Assessments (and when applying the Sequential Test) how an impounding reservoir	

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		will modify existing flood risk in the event of a flood in the catchment it is located within, and/or whether emergency draw-down of the reservoir will add to the extent of flooding. If considering allocating land for development within a reservoir flood zone, local planning authorities should discuss their proposed site allocations with reservoir undertakers (such as U UW) at the earliest opportunity to: - avoid intensification of development within areas at risk from reservoir failure; and - ensure that reservoir undertakers can assess the cost implications of any reservoir safety improvements required due to changes in land use downstream of their assets. Developers should be expected to cover any additional costs incurred, as required by the National Planning Policy Framework's 'agent of change' policy (paragraph 200). This could be through Community Infrastructure Levy or section 106 obligations for example. If you are minded to allocate any sites in a reservoir flood risk zone, further consideration of the implications of being located downstream of the reservoir exceedance path will be required through liaison with the	

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		reservoir operator as the cost of any mitigation measures could be material to the deliverability of the site. Thereafter, if the sites are allocated, you will need to clearly reflect the need for the implications for the reservoir exceedance risk to be addressed and mitigated where necessary in the site-specific policy / site-specific development considerations for the site. Sustainable Drainage – Foul and Surface Water It is important to explain that the existing drainage systems are often dominated by combined sewers. This method of sewer infrastructure is as a result of the time that it was constructed, with combined sewers taking both foul and surface water. The Environment Act 2021 places a clear obligation on sewerage undertakers in England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health. Consistent with this obligation, we request that every effort is made to ensure that new development avoids discharging surface water to the existing public sewerage system. Surface water should instead discharge to more	

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		sustainable alternatives as outlined in the surface water management hierarchy. This will ensure the impact of development on public wastewater infrastructure, both in terms of the wastewater network and wastewater treatment works, is minimised. We adopt this position as surface water flows are very large when compared with foul flows. If there is a consistent approach to surface water management as part of new development, it will help to manage and reduce surface water entering the sewer network, decreasing the likelihood of flooding from sewers, whilst also minimising the impact on residents and businesses, and the impact on the environment. New development must manage foul and surface water in the most sustainable way in accordance with national planning policy. We wish to emphasise the importance of any future policy setting out the need to follow the hierarchy of drainage options for surface water in the NPPG which clearly identifies the public combined sewer as the least preferable option for the discharge of surface water and the need for priority to be given to the implementation of sustainable drainage	

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		systems, especially multi-functional sustainable drainage systems, in accordance with the latest guidance in the NPPF and NPPG. UUW recommends that the issues of flood risk and surface water management are dealt with as two separate policies. It is our view that a separate planning policy for each matter sets a clear process in relation to surface water management for all new development. Paragraph 181 of the National Planning Policy Framework (NPPF) outlines that: ‘When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.’ Noting that not all applications are required to submit a flood risk assessment, UUW wishes to outline that emerging policy should set an expectation that all applications will be required to submit clear evidence that the hierarchy for surface water management has been fully investigated to ensure that flood risk is not increased elsewhere. We wish to recommend that policy requires applicants to	

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		submit a foul and surface water drainage strategy that fully investigates the surface water hierarchy to minimise the risk of flooding and ensures that future development sites are drained in the most sustainable way whilst also being resilient to the challenges of climate change. We wish to recommend the following wording for inclusion as policy in any future local plan. Recommended Policy Where required by the local planning authority, applications must be supported by a strategy for foul and surface water management. Surface water must be discharged in accordance with the hierarchy of runoff destinations in the national standards for sustainable drainage systems (SuDS). Proposals must be designed to maximise the retention of surface water on-site and minimise the volume, and rate of, surface water discharge off-site. The design of drainage systems shall be in accordance with the national standards for SuDS or any replacement national standards. To demonstrate any reduction in discharge rates, applicants must submit clear evidence of existing operational connections from the site	

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		with associated calculations on rates of discharge. Where clear evidence of existing connections is not provided, applicants will be required to discharge at a greenfield rate of run-off. The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted. Applications will be required to incorporate sustainable drainage which is proportionate to the nature and scale of the proposal. The sustainable drainage must be multi-functional wherever possible, and designed in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain. For any development proposal which is part of a wider development / allocation, foul and surface water strategies must be part of a holistic site-wide strategy. Pumped drainage	

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		systems must be minimised and a proliferation of pumping stations on a phased development will not be acceptable. Applications must be accompanied by drainage management and maintenance plans including a plan for any watercourse within the application site or an adjacent watercourse where the application site is afforded riparian rights. Explanatory Text Application of the hierarchy for managing surface water will be a key requirement for all development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted to demonstrate why alternative preferable options in the surface water hierarchy are not available. Foul and surface water drainage must be considered early in the design process. Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, including retrofit SuDS	

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		opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance. The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from	

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		overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer. Holistic site-wide drainage strategies will be required to ensure a coordinated approach to drainage between phases, between developers, and over a number of years of construction. Applicants must demonstrate how the approach to drainage on any phase of development has regard to interconnecting phases within a larger site with infrastructure sized to accommodate interconnecting phases. When necessary, the holistic drainage strategy must be updated to reflect any changing circumstances between each phase. The strategy shall be prepared in liaison with infrastructure providers and outline how each phase interacts with other phases.	

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		In addition to the above general policy relating to drainage, we request that you include site-specific policies regarding the approach to drainage when allocating a site, preferably informed by a flood risk assessment / drainage strategy. When allocating new major development sites, we request that your site-specific policy clearly states that applicants must make space available in their proposals for multi-functional sustainable drainage. We recommend the following wording. Recommended Policy Applicants must identify land at the site that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment. It is important that the new local plan and associated design guidance includes clarity in relation to the requirement for sustainable drainage systems on sites. This clarity is critical to avoid regulatory / policy uncertainty and ensure a level playing to developers operating in a competitive setting when acquiring a site (see Sustainable	

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		drainage and new housing developments, Payne, Walker, Illman and Sharp, 2023). We strongly recommend that policy and design guidance clearly identifies the need for major developments to make space for multi-functional sustainable drainage systems. As evidenced in the aforementioned research, clarity of policy requirements will help to secure better sustainable drainage results in the final design of the development. We believe that adding this clarity to site-specific policy helps to remove uncertainty, which in turn helps to contribute to a level playing field during the land acquisition process. Water Efficiency We recommend that the local plan includes a policy requirement for new development to be built to the optional water efficiency standard prescribed in Building Regulations. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Building Regulations includes a requirement for all new dwellings to	

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		achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). At the current time, Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015 an 'optional' requirement was introduced which is currently set at 110 l/p/day for new residential development. This can be implemented through local planning policy where there is a clear need based on evidence. We have enclosed evidence to justify this approach. As you will see from the evidence, we believe that the optional standard can be achieved at no additional cost¹. We therefore recommend the local plan includes the following water efficiency policy: Recommended Policy All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not	

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		exceed the levels set out in the applicable BREEAM 'Excellent' standard. As mentioned below, surface water should be managed as close to its source as possible. There are opportunities such as rainwater recycling, green roofs and water butts and we encourage the LPA to embrace all water efficiency measures. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.	
Woodland Trust	Yes, the Woodland Trust would support this in order to prevent developments being built in areas that are unsuitable.		Support noted.

Respondent name	(57) Do you support the retention of the main elements of the existing renewable energy policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts?	(58) Are there areas of the Borough where particular types of renewable energy development should not take place due to harmful impacts? Please specify and explain.	(59) Should the new Local Plan retain the sequential approach to the use of agricultural land for renewable energy projects?	Council Response
Alban Cassidy			Renewable energy projects should be considered on their merits in line with Government guidance only.	Comments noted.
Anna Briggs		No, renewable energy should be used as much as possible.		Comments noted.
Bryning with Warton Parish Council	Yes	Yes - devastating impact of cable routes and substations mean such development should not be permitted and an alternative be investigated. On-shore windfarms should be looked into but in the Warton area due to Aerospace and migrating	yes but no compulsory purchases	Comments noted. The transmission cables associated with the Morgan and Morecambe offshore windfarms is not within the Council's jurisdiction and is a nationally significant infrastructure project to be determined by the Secretary of State. The Council will not be including a policy on the Morgan and Morecambe offshore windfarms in the Local Plan to 2042. Comments on the impact of renewable and low carbon energy generation towards Warton Aerodrome are acknowledged.

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		birds this should be undertaken very carefully.		Local Plan policy CCH3 considers the impact on aviation and defence navigation systems and communications. This is in respect of Blackpool Airport, Warton Aerodrome and MoD Inskip radio communication facility. The avoidance of impacts on these strategically important facilities should be given great weight in decision-making.
Christine Abbott		Yes. Blackpool airport - risk of collision SPA/SSSI/BHS/countryside etc - damage to wildlife and habitats, degrades the view and open area, noise/air pollution BAE- collision/bird strikes/communication interference	Yes but to object in the first instance is preferable.	Comments noted. Policy CCH3 considers the impact of proposed developments for renewable energy and low carbon energy generation. This includes multiple criteria that should be considered when determining development proposals. The impact on aviation and defence navigation systems and communications should be taken into account. This is

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		Ethelene pipelines subsurface -risk of explosion Residential areas - Noise, dust, traffic, vibration impacts. EMF unknown risk. Mental health impacts, loss of house value etc. Agricultural Land - farmland should be used for grazing/ growing crops and not energy infrastructure. Conflict of Interest - David Miliband involved in renewables, Net Zero approves the Plans etc. I.e. Nowhere!		particularly in respect of BAE Systems, Warton. Agricultural land is to be considered, requiring proposals are not located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that poorer quality land could not be used instead, and that the benefits outweigh the economic and other benefits of the best and most versatile agricultural land. Ecological impacts of renewable and low carbon energy are also to be considered, avoiding impacts on mammals and birds on protected sites and in certain circumstances requiring a habitats regulations assessment to be undertaken.

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Claire Parker for Blackpool Council	It is important to ensure all applications are determined in accordance with the development plan, unless material considerations determine otherwise, such as the planning balance of harm against benefits.			Comments noted.
David Chedd	Yes	Grade 2 and 3 agricultural land. Food production is more important than energy generation.	Yes	Comments noted. Policy CCH3 considers the impact of proposed developments for renewable energy and low carbon energy generation. One of the assessment criteria is the impact on land resources. The policy text applies the sequential test whereby requires that proposals are not located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that

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				poorer quality land could not be used instead, and that the benefits outweigh the economic and other benefits of the best and most versatile agricultural land.
Emma Swindells	Yes			Support noted.
Ethan Ellison	Yes, it needs to be balanced but it also needs to recognise the amount of appeals for renewables nationally and government targets and priorities. Therefore a clearer policy and guidelines could help direct renewables to better sites.		Yes, but also consider wider impacts and technologies. For example agrivoltaics which allow for agriculture set beneath solar providing a dual benefit which some crops are actually better with due to the shade. Policy should account for new technologies and diversification of businesses. Renewables could support, not necessarily destroy agriculture.	Comments noted.
Frank Andrews	yes			Support noted.

Respondent name	(57) Do you support the retention of the main elements of the existing renewable energy policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts?	(58) Are there areas of the Borough where particular types of renewable energy development should not take place due to harmful impacts? Please specify and explain.	(59) Should the new Local Plan retain the sequential approach to the use of agricultural land for renewable energy projects?	Council Response
Frank Andrews	yes			Support noted.
Gerard Malone	No. We need more!!!	Other than Feacking site, no. I'm in favour of all other renewables including solar, wind, wave. I see. I issue at all with windmills in my area.	No. Expand!!	Comments noted.
Hannah Dell'Armi		yes - see the latest two applications to run cables right through the borough!		The transmission cables associated with the Morgan and Morecambe offshore windfarms is not within the Council's jurisdiction and is a nationally significant infrastructure project to be determined by the Secretary of State. The Council will not be including a policy on the Morgan and Morecambe offshore windfarms in the Local Plan to 2042.

Respondent name	(57) Do you support the retention of the main elements of the existing renewable energy policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts?	(58) Are there areas of the Borough where particular types of renewable energy development should not take place due to harmful impacts? Please specify and explain.	(59) Should the new Local Plan retain the sequential approach to the use of agricultural land for renewable energy projects?	Council Response
Irene Jacques	Yes	Farmland. Food production is essential. The beach /sand dunes must not be spoilt, it's a great asset that we have here on the Fylde coast.	Only very low grade land should be used for renewal energy projects.	Comments noted. Policy CCH3 considers the impact of proposed developments for renewable energy and low carbon energy generation. One of the assessment criteria is the impact on land resources. The policy text applies the sequential test whereby requires that proposals are not located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that poorer quality land could not be used instead, and that the benefits outweigh the economic and other benefits of the best and most versatile agricultural land
John Leadbeater	Not sure what this means.	Agricultural land should not be appropriated for renewable energy. Food provision is more important.	Don't know what this means - see above.	Comments noted. Policy CCH3 considers the impact of proposed developments for renewable energy and low carbon energy generation. One of the assessment criteria is the impact on land resources.

Respondent name	(57) Do you support the retention of the main elements of the existing renewable energy policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts?	(58) Are there areas of the Borough where particular types of renewable energy development should not take place due to harmful impacts? Please specify and explain.	(59) Should the new Local Plan retain the sequential approach to the use of agricultural land for renewable energy projects?	Council Response
				The policy text applies the sequential test whereby requires that proposals are not located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that poorer quality land could not be used instead, and that the benefits outweigh the economic and other benefits of the best and most versatile agricultural land
John Maskell	Yes		Yes	Support noted.
Keith McKay	Yes	Yes! - see all the arguments put forward regarding the Morgan and Morecambe projects! It's about the transmission routes used to get power to where it is needed, and having a sustainable route to achieving a stable base electrical load.	Solar panels should never blot out the capture of nuclear energy by growing grass which then can be converted by grazing!	Comments noted. The transmission cables associated with the Morgan and Morecambe offshore windfarms is not within the Council's jurisdiction and is a nationally significant infrastructure project to be determined by the Secretary of State. The Council will not be including a policy on the Morgan and Morecambe offshore windfarms in the Local Plan to 2042.

Respondent name	(57) Do you support the retention of the main elements of the existing renewable energy policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts?	(58) Are there areas of the Borough where particular types of renewable energy development should not take place due to harmful impacts? Please specify and explain.	(59) Should the new Local Plan retain the sequential approach to the use of agricultural land for renewable energy projects?	Council Response
Linda Nulty	Trees retained and woodland areas provided. I am in favour of all types of renewable energy	No. It all makes sense, except when it removes good agricultural land	Yes - agricultural land needs protected for food production - even more important in future years	Comments noted. Policy CCH3 considers the impact of proposed developments for renewable energy and low carbon energy generation. One of the assessment criteria is the impact on land resources. The policy text applies the sequential test whereby requires that proposals are not located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that poorer quality land could not be used instead, and that the benefits outweigh the economic and other benefits of the best and most versatile agricultural land. The impacts on the landscape are to be considered in determining development proposals also, with CCH3 requiring the avoidance of ecological impacts.
Lytham St Annes Civic Society	Yes			Support noted.

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Marcus Dowling	Yes	The Dunes	Yes	Policy CCH3: Renewable and Low Carbon Energy Generation (excluding onshore wind turbines) considers the impact of proposed developments for renewable energy and low carbon energy generation. One of the assessment criteria when considering proposals for renewable and low carbon energy is the ecological impact on mammals and birds on protected sites and on the migratory routes and functionally linked land. Development proposals will also be determined in accordance with policy ENT6: Protected Coastal and Wetland Assets that applies protections to Sites of Special Scientific Interest (SSSIs) including the Lytham St Annes Sand Dunes.

Respondent name	(57) Do you support the retention of the main elements of the existing renewable energy policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts?	(58) Are there areas of the Borough where particular types of renewable energy development should not take place due to harmful impacts? Please specify and explain.	(59) Should the new Local Plan retain the sequential approach to the use of agricultural land for renewable energy projects?	Council Response
P Stanford		Greenfield sites Say within 3 miles of our villages and town boundary Not taking away any countryside / green belt area Suggest you reaffirm you position with regards to fracking – as when (not if) Reform get in – there will be more chaos.	Maybe - but not always	Comments noted. Policy CCH3 affirms that renewable and low carbon energy proposals in the Green Belt will need to demonstrate very special circumstances where elements of and proposed renewable energy project comprise inappropriate development. This is in conjunction to policies DST3: Green Belt and DST4: Areas of Separation and DST5: The Countryside that detail acceptable development in those areas outside of the settlement boundaries. Policy DST2 provides guidance on acceptable development inside of the settlement boundaries.
Stephen and Jacqueline Croft	Yes. Particularly the Morgan/Morecambe plans which will cause serious harm to the local environment and livelihoods.		I don't know what the "sequential approach" is. However, my view is that agricultural land should be kept as agricultural land. We are a nation that is vulnerable regarding Food Security and yet we cover	Comments noted. The transmission cables associated with the Morgan and Morecambe offshore windfarms is not within the Council's jurisdiction and is a nationally significant infrastructure project to be determined by the Secretary of State.

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			our land with solar panels. Madness. I would rather see mandates to ensure that new houses are correctly and adequately insulated, have solar panels on their roofs.	The Council will not be including a policy on the Morgan and Morecambe offshore windfarms in the Local Plan to 2042. With regards to agricultural land Policy CCH3 considers the impact of proposed developments for renewable energy and low carbon energy generation. One of the assessment criteria is the impact on land resources. The policy text applies the sequential test, requiring that proposals are not located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that poorer quality land could not be used instead, and that the benefits outweigh the economic and other benefits of the best and most versatile agricultural land.
Susan Lee	Yes	The cable corridor threatens to wreak havoc		Comments noted. The transmission cables associated with the Morgan and Morecambe offshore windfarms is not

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		on the whole area for no benefit		within the Council's jurisdiction and is a nationally significant infrastructure project to be determined by the Secretary of State. The Council will not be including a policy on the Morgan and Morecambe offshore windfarms in the Local Plan to 2042.
Avison Young for National Gas		National Gas Transmission assets within the Plan area Following a review of the above Development Plan Document, we have identified one or more National Gas Transmission assets within the Plan area. Details of National Gas Transmission assets are provided below. Asset Description Gas Transmission Pipeline, route: CARNFORTH TO		Comments noted. Policy IFR3: Protection of Strategic National Infrastructure provides guidance on development impacting on national strategic infrastructure. This states that development would not be permitted where it would prejudice the safety or restrict the operation of the certain national infrastructure, making specific reference to national gas pipelines.

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		TREALES Gas Transmission Pipeline, route: LUPTON TO BRETHERTON Gas Transmission Pipeline, route: TREALES TO BURSCOUGH A plan showing details and locations of National Gas Transmission's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to National Gas Transmission assets.		
Environment Agency		An increase in renewable energy developments		Comments noted. Applicants will not be required to justify the overall need for

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		often call for an increase in the requirement for Battery Energy Storage System (BESS) developments. Battery Energy Storage Systems (BESS) are a crucial technology for meeting the UK's net-zero targets through renewable energy. Development proposals must give spatial consideration of all environmental matters, and must consider overall risks and any necessary mitigation/management measures. Environmental and Safety Risks: • Fire and emissions		renewable and low carbon energy development in either a national, regional or local context. Opportunities for renewable and low carbon development should be maximised whilst ensuring that adverse impacts are addressed satisfactorily.

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		• Waste Management • Environmental Impacts • Safety BESS do not currently fall within the Environmental Permitting Regulations, Hazardous Substances Consent or COMAH regimes. BESS developments could present pollution risks (including fire-related risk) to groundwater. Generally, the risks to groundwater and surface water from BESS development would be from pollution of surface water drainage from the site due to: • A battery container fire		

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		at a BESS site • Accidents or spillages from battery containers at a BESS site. To mitigate the risks to groundwater and surface water, as well as, proposing appropriate measures to manage activities, applicants should consider whether BESS battery containers should be located away from vulnerable receptors to reduce associated environmental risks. For example, where a BESS is part of a solar farm, can it be located elsewhere on the site to avoid vulnerable groundwater		

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		areas or being near to surface watercourses. The Department for Energy Security and Net Zero have published: Health and safety in grid scale electrical energy storage systems, which provides guidance on a number of topics related to health and safety including on 'Design and planning' that provides guidance on battery technology, site selection, site layout and emergency planning. It also includes a section on 'Decommissioning and end of life', including		

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		dealing with batteries that have come to the end of their use in the BESS.		
Historic England	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting.	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP.	Policy CCH3: Renewable and Low Carbon Energy Generation (excluding onshore wind turbines) considers the impact of proposed developments for renewable energy and low carbon energy generation. One of the assessment criteria when considering proposals for renewable and low carbon energy is the impacts on heritage assets. Proposals for renewable and low carbon energy should not harm the significance of heritage assets and their settings unless the proposal meets the requirements of national policy.

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		then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP.		
National Highways	Q57. WSP recommend that National Highways support this approach, which aligns with the paper 'Decarbonising Transport: A Better, Greener Britain'.	Q58. WSP offer no comments on this question, it is recommended National Highways highlights that the development of renewable energy areas should ensure that it is adopted into day-to-day workings through the Borough and are appropriately placed so that they do not impact the SRN (i.e. large scale	Q59. No comment.	Comments noted. Policy CCH3: Renewable and Low Carbon Energy Generation (excluding onshore wind turbines) supports the principle of development for renewable and low carbon energy development. Proposed developments will be assessed on various criteria, one of which being the impacts on highway safety and capacity and movements associated with the development. This includes construction and decommissioning so that the impact on the Strategic Road Network is minimal.

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		solar projects would require a Glint and Glare Assessment if placed adjacent to the SRN to ensure that it does not impact on the safe operation of the motorway).		
Network Rail		Solar Farms / Solar Arrays / Solar Panels Solar Panels These must be anti-glare - most solar panels these days are 'Anti-Glare' but this does not mean that glare is totally mitigated therefore developers will be required to provide details of the level of		Comments noted. The Council does not consider it appropriate to extend the current policy CCH3 beyond its current scope.

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		Anti-Glare – developers will also be asked to provide in-depth glint and glare study which is to be undertaken with consideration of the impacts to the existing operational railway. Solar Farms Network Rail takes serious safety precautions with regards to direct sunlight but reflected light, under certain conditions, can also be considered a safety concern. Network Rail will raise an objection to solar photovoltaic (PV) developments that are		

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		within about 100m of their infrastructure due to the possible safety implications caused by reflected sunlight, or glint and glare. The areas of possible impact are often: 1. The effect of solar reflections on train drivers. 2. The effect of solar reflections upon nearby level crossings and associated warning lights. 3. The possibility of solar reflections affecting railway light signals. Network Rail will be		

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		concerned with the possibility of the solar reflections appearing to illuminate signals that are not switched on (known as a phantom aspect illusion). This illusion (known as phantom aspect illusion) of a lit signal could possibly lead to a SPAD (Signal Passed At Danger). Network Rail will require as part of the planning application documents a Glint and Glare Assessment for PV developments near to its existing operational railway infrastructure. The aim of the Glint and Glare		

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		Assessment is: 1. To determine whether a solar reflection is geometrically possible. 2. To determine the expected visibility of the solar panels to the infrastructure in question. 3. To determine the location of the Sun with respect to a solar reflection from the solar panels. No works are to commence on the solar farm until the impacts of the proposal are assessed by Network Rail – and the developer is to fully fund all required mitigation		

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		measures to ensure the proposal both during construction & as a permanent arrangement does not impact the safe operation of the railway.		
PWA Planning for Medicom	10.6. To support the viability and deliverability of new housing on sites like School Farm, it is essential that the Local Plan's policies are enabling and do not place unnecessary burdens on development. 10.7. We support a positive policy framework for			Support noted. The Local Plan policy CCH3: Renewable and Low Carbon Energy Generation (excluding onshore wind turbines) considers the impact of proposed developments for renewable energy and low carbon energy generation. One of the assessment criteria when considering proposals for renewable and low carbon energy is the land value. A sequential test applies whereby proposals should not be located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that poorer quality land could not be used instead, and that the benefits outweigh the

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	renewable energy that applies a "tilted balance" in favour of such proposals, in line with the national priority to address the climate crisis. The policy should not be overly restrictive, for example by applying a rigid sequential test to the use of agricultural land, as this can render viable projects unfeasible due to specific technical requirements like grid connections.			economic and other benefits of the best and most versatile agricultural land.
PWA Planning for Pringle Homes	10.7. Pringle Homes supports the new Local			Comments noted.

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	Plan having a positive and enabling policy framework for renewable energy, which is critical for meeting national climate change targets. 10.8. Our own commitment to sustainability is demonstrated in the design ethos for Greenlands Farm. The proposal includes a commitment to a "fabric-first approach to maximise thermal efficiency and minimise energy demand" and will "incorporate			

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	renewable energy technologies where appropriate to support the shift toward low-carbon living". 10.9. However, we strongly advise that detailed matters of building efficiency are best and most effectively controlled through the national Building Regulations, rather than through duplicate local planning policies. The Building Regulations provide a clear, consistent, and progressively updated standard for all			

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	developers to meet. Attempting to manage technical issues like whole-life carbon through the planning system can create unnecessary burdens and uncertainty, potentially hindering the delivery of new homes. A focus on national standards, which Pringle Homes already meets and exceeds, is the most efficient route to delivering energy-efficient communities.			
PWA Planning	10.9. No. The existing policy, which requires	10.11. No. The new Local Plan should not identify	10.12. No. A rigid sequential test requiring the use of lower-grade	Comments noted. Policy CCH3 considers the impact of proposed developments for

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	a proposal to demonstrably "avoid harmful impacts," is too restrictive and is misaligned with the national imperative to address the climate crisis. The new Local Plan must adopt a much more positive stance, applying a "tilted balance" in favour of renewable energy development. 10.10. The urgency of achieving a secure, clean energy supply means that the benefits of renewable energy proposals are of national significance	"no-go" areas or apply a policy veto for renewable energy in certain locations. This approach is overly simplistic and runs contrary to the NPPF's requirement for all planning applications to be considered on their individual merits. The delivery of renewable energy is too important to be constrained by arbitrary geographical barriers; every proposal should be assessed through the planning balance.	agricultural land is inappropriate and often unworkable for renewable energy projects. These developments have very specific locational requirements, chief among them being proximity to a viable National Grid connection point. The availability of a grid connection is the primary determinant of a project's feasibility and location, and these connection points do not always align with lowergrade agricultural land. 10.13. The planning balance will, in the vast majority of cases, find that the significant national benefits of delivering renewable energy infrastructure clearly outweigh the harm arising from the loss of a finite area of	renewable energy and low carbon energy generation. One of the assessment criteria is the impact on land resources. The policy text applies the sequential test whereby requires that proposals are not located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that poorer quality land could not be used instead, and that the benefits outweigh the economic and other benefits of the best and most versatile agricultural land. Policy CCH3 requires that opportunities for renewable and low carbon energy should be maximised whilst adverse impacts are addressed satisfactorily. It lists the criteria in which proposals will be assessed against but any mitigation measures required must be in place prior to development commencing. The policy does not require applicants to justify the overall need for renewable and

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	and should be presumed to carry significant weight. A sound policy should state that proposals for renewable and low-carbon energy will be approved unless any adverse impacts would significantly and demonstrably outweigh the benefits, in line with the core test of the NPPF. A policy that places the primary burden on avoiding all harm, rather than on a balanced assessment, will stifle the delivery		agricultural land, particularly given that many renewable developments, such as solar farms, are temporary and reversible.	low carbon energy development in principle.

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	of essential energy infrastructure.			
S&L for River Properties	No - national policy setting out how local planning authorities should determine applications for renewable and low carbon energy development is provided in the NPPF and the Planning Practice Guidance, and it is unnecessary for the new Local Plan to duplicate national policy. If a policy is included or retained in the new Local Plan however, then it must		No - the new Local Plan must be consistent with national policy for renewable and low carbon energy development as set out in the NPPF and the Planning Practice Guidance. This explains that the use of areas of poorer quality land is preferred to those of a higher quality, and requires a decision maker to consider this in the planning balance. It does not specify that renewable and low carbon energy development proposed on best and most versatile agricultural land must be subject to, and pass, a sequential test to demonstrate that no lower	The principle of development for renewable and low carbon development is supported and the applicant is not required to justify the development. The Council requires adverse impacts to be addressed satisfactorily and lists the criteria in which proposed developments will be assessed in policy CCH3. Evidence will be required to demonstrate that any impacts can be avoided or satisfactorily mitigated, but need only be proportional to the scale and type of development. Any required mitigation measures must be put in place prior to the development commencing. Regarding the assessment criteria in policy CCH3, the impact of proposed development

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	be positively worded to make clear that rather than 'only giving approval where a proposed development can demonstrably avoid harmful impacts', the Council will 'give approval subject to ensuring that any adverse impacts are addressed appropriately' to be consistent with the wording of NPPF 165.		quality agricultural land is available.	is judged against impact on land resources. The policy text applies the sequential test whereby requires that proposals are not located on the best agricultural land (grades 1, 2 and 3a) unless it is demonstrated that poorer quality land could not be used instead, and that the benefits outweigh the economic and other benefits of the best and most versatile agricultural land.
United Utilities		New Renewal Energy Opportunities We are currently evaluating all land owned		Comments noted.

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		by UUV within local authorities that could be used for renewable energy and developing a list of candidate sites. In identifying land, we recognise the strategic importance of aligning our site selection process with local, regional and national policies and objectives on renewable energy and net zero. As part of the preparation of your new local plan, we would welcome the opportunity to further discuss your approach to the delivery of renewable energy sites and the		

Respondent name	(57) Do you support the retention of the main elements of the existing renewable energy policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts?	(58) Are there areas of the Borough where particular types of renewable energy development should not take place due to harmful impacts? Please specify and explain.	(59) Should the new Local Plan retain the sequential approach to the use of agricultural land for renewable energy projects?	Council Response
		identification of new opportunities.		
Woodland Trust	Yes. The Woodland Trust supports the retention of the main elements of the existing renewable energy policy, as we recognise the importance of expanding renewable energy to address climate change. However, we emphasise that the delivery of renewable energy must not come at the expense of the natural environment, including woodland,	The Woodland Trust considers that renewable energy developments should not be located in the vicinity of ancient woodland or veteran trees. These habitats are irreplaceable and provide critical ecological, cultural, and landscape value. Development too close to them could lead to direct loss, fragmentation, or indirect impacts such as changes in drainage, soil compaction, shading, or		Support noted. Policy CCH3: Renewable and Low Carbon Energy Generation (excluding onshore wind turbines) supports the principle of development for renewable and low carbon energy development. The avoidance of ecological impacts on mammals and birds on protected sites and migratory routes is one of the criteria that is used to assess proposals. Project-specific Habitats Regulations Assessments will be required for proposals near European designated sites, and these should demonstrate that there will be no likely significant effect on these sites before planning consent is granted.

Respondent name	(57) Do you support the retention of the main elements of the existing renewable energy policy that makes clear that approval will only be given where a proposal can demonstrably avoid harmful impacts?	(58) Are there areas of the Borough where particular types of renewable energy development should not take place due to harmful impacts? Please specify and explain.	(59) Should the new Local Plan retain the sequential approach to the use of agricultural land for renewable energy projects?	Council Response
	veteran trees, and other irreplaceable habitats. Any proposals should be carefully assessed to avoid, minimise, and mitigate harmful impacts on biodiversity and ecological networks.	disturbance, all of which would harm their long-term health and the species they support.		

Respondent name	(60) Do you support a whole-life-carbon approach to the assessment of building efficiency?	Council Response
Alban Cassidy	Yes.	Comments noted.
Bryning with Warton Parish Council	Yes, Although a policy that lays out all of the potential net zero incentives, where they are, how the are managed and what new incentives and developments are in the pipeline/2042 plan would be beneficial.	Comments noted.
Christine Abbott	No. Sounds like a Developers dream and an excuse to use new land instead of reusing old sites. Environmentally damaging.	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.
David Chedd	Yes	Comments noted.
Emma Swindells	Yes	Comments noted.
Ethan Ellison	Yes	Comments noted.
Gerard Malone	Yes but don't be so restrictive	Comments noted.
Irene Jacques	Yes, it gives a more accurate assessment/picture of a building.	Comments noted.
John Leadbeater	Maybe	Comments noted.
John Maskell	Yes	Comments noted.
Keith McKay	Ashes to ashes, dust to dust! We only borrow the carbon atoms for our short duration, they last for ever!	Comments noted.
Linda Nulty	Not sure I understand any of this	Comments noted.

Respondent name	(60) Do you support a whole-life-carbon approach to the assessment of building efficiency?	Council Response
Lytham St Annes Civic Society	Yes. Houses should only be demolished for VERY good reasons, not on the whim of fashion. The primary position should always be to refurbish rather than demolish. The use of cement-based render on top of existing brick-built buildings should only be allowed where there is proof that it will significantly improve the thermal efficiency of the home considering the huge carbon footprint of its manufacture. Also render requires upkeep. Poorly kept render will lead to water ingress and therefore future problems. All individual property redevelopments should have renewable energy sources in built.	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.
Marcus Dowling	Yes	Comments noted.
P Stanford	It's an idea – but is it worth the effort really in the grand scheme of things ?	Comments noted.
Stephen and Jacqueline Croft	Somewhat. I think it is something of a 'trend'.	Comments noted.
Historic England	Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. There may be instances where this policy/parts of it cannot be applied due to harm to the significance of heritage assets and their setting.	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.
Home Builders Federation	Building Efficiency 39.The HBF considers that if the Council is to introduce a policy in relation to whole life carbon (WLC) it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.

Respondent name	(60) Do you support a whole-life-carbon approach to the assessment of building efficiency?	Council Response
	and maintenance, demolition and disposal. The Council will also have to consider how the policy will interact with other policies, for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development. 40. Aecom on behalf of MHCLG have undertaken a research report on the practical, technical and economic impacts of measuring and reducing embodied carbon in new buildings (see https://www.gov.uk/government/publications/consideration-of-embodied-carbon-in-new-build-ings). 41. Aecom highlights issues with the lack of consistency in reporting on carbon assessment outputs, the quality of carbon assessments, large gaps in the availability of both product specific and generic data, the variation in product carbon results for similar building products and lack of consistency across carbon tools. They also highlight issues with the uptake of lower embodied carbon materials and products due to the costs, risks and insurance, the need to upskill the industry and access to carbon tools. 42. Whilst this report makes recommendations as to how all of the challenges they identify can be addressed, they have not been addressed yet, and are not likely to be addressed in the short term. The HBF is concerned that as such, there are significant challenges with introducing a policy in relation to WLC, for many of the reasons identified in this research and without a clear and fully evidenced policy, such a WLC policy cannot be supported.	
Lichfields for Taylor Wimpey	Building Efficiency Taylor Wimpey supports the promotion of sustainable design in principle but any specific requirements for a whole-life carbon assessment must not preclude viability of development and prevent the delivery of vital housing development from coming forward.	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.

Respondent name	(60) Do you support a whole-life-carbon approach to the assessment of building efficiency?	Council Response
National Highways	Q60. Whilst building efficiency is not specifically relevant to National Highways, any efficiencies that would reduce carbon outputs/produce carbon savings would be supported particularly as this is in line with Circular 01/2022. Integration of renewable and low carbon energy developments is likely to include infrastructure including electric vehicle charging points, as well as other green infrastructure and active travel modes that will pay due regard to the highway. This will not only benefit the environment but also reduce the number of vehicles looking to utilise the SRN.	Comments noted.
NHS Property Services	Achieving Net Zero NHSPS fully support policies that promote carbon neutral development, and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.
Pegasus Group for Rowland Homes	6.8. The PPG4 notes that local planning authorities can set energy performance standards for new housing higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes. As a responsible housebuilder, Rowland Homes fully support the need for new dwellings to be energy efficient and use sustainable construction methods. 6.9. Although Rowland Homes are aware of the emerging Future Homes Standards, should the Council look to introduce a higher local standard, this will need to be duly considered and tested in the viability evidence supporting the Local Plan, to ensure it will not lead to delays in delivery or viability concerns.	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.
PWA Planning for Medicom	10.8. Similarly, while we support the goal of creating energy-efficient buildings, this is most effectively and consistently controlled through the national Building Regulations. The new Local Plan should avoid duplicating this by introducing	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.

Respondent name	(60) Do you support a whole-life-carbon approach to the assessment of building efficiency?	Council Response
	complex local policies on matters like whole-life carbon. Such policies can create uncertainty and deter investment, ultimately hindering the delivery of much-needed new homes.	
PWA Planning	10.14. No. We strongly advise against incorporating a whole-life-carbon policy into the Local Plan. This matter is, and should remain, the purview of the national Building Regulations. 10.15. Attempting to control this through the planning system would create an unnecessary and burdensome layer of duplication. The Building Regulations are consistently and progressively being tightened by government, and this is the most effective and uniform mechanism for delivering improvements in building efficiency and reducing both operational and embedded carbon. 10.16. Furthermore, there are significant practical issues with such a policy: • Expertise: Local authority planning officers do not typically have the specialist technical expertise to accurately interpret and assess complex whole-life-carbon data. Page 38 • Resources: It would place an additional, unfunded burden on an already stretched planning service. • Deterrent to Investment: Adding extra, complex local requirements on top of already high national standards for energy efficiency can deter investment and slow down housing delivery. The experience of other authorities, such as Lancaster City Council which has struggled with housing delivery following the introduction of similar demanding local policies, should serve as a cautionary tale. 10.17. This issue is best and most effectively dealt with through the national Building Regulations.	The Council has decided not to include a whole-life-carbon approach in the Local Plan for assessing building efficiency.

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
Anna Briggs	I'm not sure where to insert these issues as the categories you have used are wide so I'll copy them here and there: -aesthetics: harmonizing store fronts would help keep a certain level of charm. For example in St Annes, some shops just look dire and others beautiful. Maybe unified coloured awnings, plants hanging etc could make a more harmonious effect like in Lytham. More regular scrubbing of the rain protection kiosks and benches would be good as they often get covered in guano. The blue metal structures in St Annes could do well all being painted dark green or brick colour or brown to harmonize with the Victorian brick colour. -young people bullying, anti-social behaviour, poor mental health: young people often seem hopeless, with issues such as misogynistic behaviour, bullying,	I'm not sure where to insert these issues as the categories you have used are wide so I'll copy them here and there: -aesthetics: harmonizing store fronts would help keep a certain level of charm. For example in St Annes, some shops just look dire and others beautiful. Maybe unified coloured awnings, plants hanging etc could make a more harmonious effect like in Lytham. More regular scrubbing of the rain protection kiosks and benches would be good as they often get covered in guano. The blue metal structures in St Annes could do well all being painted dark green or brick colour or brown to harmonize with the Victorian brick colour. -young people bullying, anti-social behaviour, poor mental health: young people often seem hopeless, with issues such as misogynistic behaviour, bullying,	Response has been previously answered.

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	depression, vaping addiction, teen pregnancy, body image issues, not wearing bike helmets, and little to do. It is an older population but there truly are too few non-school fun spaces for young people to enjoy in all of Fylde. More CCTV for example in Ashton Gardens and on the beach would help curb anti-social behaviour perhaps. -I would appreciate the monthly market to be weekly, to be able to buy most of my fresh food from local producers and not supermarkets. -pollution on the beaches is INSANE and should not be left to volunteers to take care of. Many jobs could be created to fine and surveil and clean the beaches, as well as educating tourists about pollution. -water quality: I have lived here for a few years and the water has never been sufficient free from sewage to swim in. This is a major drawback to the local community's wellbeing and to tourism. -recycling should be enforced like in Germany. In all the workplaces I've had, no staff member recycled anything and management didn't care. -many roles locally are in elder care, this is my sector. This is a sector with a huge amount of managerial bullying and exploitation, pressure to not be unionized, ridiculously low pay and pressure to do non-contractual	depression, vaping addiction, teen pregnancy, body image issues, not wearing bike helmets, and little to do. It is an older population but there truly are too few non-school fun spaces for young people to enjoy in all of Fylde. More CCTV for example in Ashton Gardens and on the beach would help curb anti-social behaviour perhaps. -I would appreciate the monthly market to be weekly, to be able to buy most of my fresh food from local producers and not supermarkets. -pollution on the beaches is INSANE and should not be left to volunteers to take care of. Many jobs could be created to fine and surveil and clean the beaches, as well as educating tourists about pollution. -water quality: I have lived here for a few years and the water has never been sufficient free from sewage to swim in. This is a major drawback to the local community's wellbeing and to tourism. -recycling should be enforced like in Germany. In all the workplaces I've had, no staff member recycled anything and management didn't care. -many roles locally are in elder care, this is my sector. This is a sector with a huge amount of managerial bullying and exploitation, pressure to not be	

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	work. The CQC, NHS, unions, council and elder care organizations should be very concerned that our most vulnerable are cared for by understaffed, undertrained, exhausted, undersupported and underpaid people. -lack of knowledge about services: many people here are unaware about what cultural organizations, clubs, churches, libraries, the CAB, volunteering sector, the council etc. has to offer. The social media and newsletters from official channels should highlight these opportunities better. Blackpool council does a very good job at this. -accessibility: too many spaces are inaccessible. As an area with an older and very highly disabled population (the same for our tourists who are often older and disabled), Fylde could be a global model for smart accessible options for all to enjoy the beach, trains, buses, cafes etc. Why should disabled people wait until 9.30am to use their free pass on the bus? Do we not have medical appointments, work, school drop off, shopping to do like anyone else? -hate speech: the local social media is flooded with misinformation, conspiracy and hate speech. It would help for council communication staff to be a part of all local groups and share factual information to avoid this. Again, the Blackpool MP team does a very good job at social media, communication etc. and could be a model	unionized, ridiculously low pay and pressure to do non-contractual work. The CQC, NHS, unions, council and elder care organizations should be very concerned that our most vulnerable are cared for by understaffed, undertrained, exhausted, undersupported and underpaid people. -lack of knowledge about services: many people here are unaware about what cultural organizations, clubs, churches, libraries, the CAB, volunteering sector, the council etc. has to offer. The social media and newsletters from official channels should highlight these opportunities better. Blackpool council does a very good job at this. -accessibility: too many spaces are inaccessible. As an area with an older and very highly disabled population (the same for our tourists who are often older and disabled), Fylde could be a global model for smart accessible options for all to enjoy the beach, trains, buses, cafes etc. Why should disabled people wait until 9.30am to use their free pass on the bus? Do we not have medical appointments, work, school drop off, shopping to do like anyone else? -hate speech: the local social media is flooded with misinformation, conspiracy and hate speech. It would help for council communication staff to be a part of all local groups and share factual information to avoid	

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
	here. -renting: there should be an easier way to rent an apartment and avoid having to pay a deposit when on a low salary or benefits. If not for my relative, I would never have qualified to rent and ended up homeless. Most people can't afford a deposit. -events and art: having an artist in residence programme, who would contribute temporary installations in the squares, cutting-edge events, Q&As with school kids, open air screenings, curated pop-ups etc. would attract a lot of different tourists here and be fun for younger people.	this. Again, the Blackpool MP team does a very good job at social media, communication etc. and could be a model here. -renting: there should be an easier way to rent an apartment and avoid having to pay a deposit when on a low salary or benefits. If not for my relative, I would never have qualified to rent and ended up homeless. Most people can't afford a deposit. -events and art: having an artist in residence programme, who would contribute temporary installations in the squares, cutting-edge events, Q&As with school kids, open air screenings, curated pop-ups etc. would attract a lot of different tourists here and be fun for younger people.	
Bryning with Warton Parish Council	Under the above sections 6 & 9 renewable energies it is expected to have seen something relating to tidal energy generation as it's a guaranteed resource, in support of the Carbon net zero approach	Would like to see some additional policy/processes for local consultation with the parish councils, especially as to where proposed building sites or changes of useage of land may take place. To ensure that other option with residents can be sought before decisions are made.	Comments noted. Strategic Policy CCH3: Renewable and Low Carbon Energy Generation – excluding onshore wind turbines will provide a framework for assessing renewable and low carbon energy proposals. Tidal energy proposals would be

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			considered under the policy alongside relevant national policy and environmental considerations.
Christine Abbott	I understand the need for growth but believe the current Govt is far exceeding requirements, ultimately compromising much of what the Fylde holds dear, i.e. green, open spaces abundant with wildlife, close knit communities and our unique culture and heritage. Recent changes in National Policy threaten these aspects and leave residents to suffer the consequences.		Comments noted. The Fylde Local Plan will demonstrate that development needs over the Plan period can be met whilst protecting land important for the contribution it makes to a “green” Fylde. However, the borough has a very limited supply of “brownfield” land and as such it is inevitable that green fields will be the source of development land. The strategy of the Local Plan is to focus development on the most sustainable locations and contains policies to protect the

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			Green Belt, Areas of Separation and the remaining countryside. The Local Plan will highlight that the Borough includes wildlife sites with International designations. There is a legal requirement that the Council demonstrates that the Local Plan will result in no likely significant effects of the designated sites. Where likely significant effects are identified, an Appropriate Assessment is required to demonstrate that the integrity of the site would not be compromised. The results will be included when available. The Local Plan will also include several policies that will aim to protect

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			environments and assets, that protect spaces with large levels of wildlife from development where necessary and historic heritage assets.
Claire Parker for Blackpool Council			Please refer to Strategic Policy ECD3: Blackpool Airport and Enterprise Zone for further information.
David Chedd	As previously mentioned, where does it end? There is a finite supply of land. If you extrapolate this plan over the next century or two rather the next decade, and take into account all the global factors affecting this, then if any of the Fylde remains above sea level we are all going to starve or worse.	The use of the word "homes" to refer to "houses" is pure spin and should be avoided, regardless of how widespread the misuse has become. It is an abuse of the language to misuse the word to refer to something other than its original defined meaning. A house is not a home until someone lives in it. Developers and builders etc. only build houses not homes. The residents - families, couples and individuals are the people that make homes.	Comments noted. The Plan will ensure that future growth is directed in the most sustainable locations. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development: St Annes (including Squires Gate),

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			Whitehills and Whyndyke, Warton, and Kirkham and Wesham. The Call for Sites and SHELAA exercise identified sufficient sites to meet needs that are suitable, available and achievable. The term 'homes' is used in the Local Plan and in this context as it is intended to refer to broad residential accommodation, rather than specifically to houses as a type of dwelling. 'Homes' refers to a range of dwelling types including houses and flats and is therefore retained to ensure the Plan outlines appropriate policies for all residential development.

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Emma Swindells	I've already addressed my concerns in previous sections. We need to catch up on the infrastructure before we build any more!		Comments noted. The Council understands the importance of ensuring that infrastructure must align with planned development. The emerging Local Plan will support delivery of necessary infrastructure alongside new development. The delivery of infrastructure will further be supported through allocations and phasing of sites. It would not be appropriate to require all infrastructure to be fully delivered before any further development takes place, as infrastructure requirements vary depending on the scale, location and nature of individual developments. The Plan will therefore ensure

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			that development is supported by the infrastructure necessary to support sustainable communities.
Gerard Malone	Look... we need to expand. We need houses for people to live in (not mansions). We need doctors dentists schools. We need energy to power it all. We need to allow for growth and not restrict it.		The Council notes that access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. Strategic Policy HOU2: Density and Mix of Housing will state that a

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			broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. Please refer to Policy for further information. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already committed) will be located at the four strategic locations for development: St. Annes (including Squires Gate), Whitehills and Whyndyke, Warton, and Kirkham and Wesham. The Council notes that a vital element of sustainable

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			development is the provision and delivery of local services and infrastructure. However, lack of infrastructure should not be seen as an obstacle to development. Planning should proactively drive and support sustainable economic development, and this includes the delivery of infrastructure. Additionally, the Framework requires that planning policies should seek to address potential barriers to investment, including any lack of infrastructure. The Local Plan will include several Infrastructure and Transport Policies to ensure the Borough provides for a wide range of supporting service provision.

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Hannah Dell'Armi	I think there should be something that allows the existing local plan to remain in effect even as the new one is being considered. Since the review started old and new applications previously declined due to them not meeting the local plan have been raised again as there's nothign to hold them accountable to, making the whole thing pretty pointless		Comments noted. The emerging Local Plan does not mean that the existing adopted Local Plan stops having effect whereby the adopted Plan will remain the basis for determining planning applications until it is replaced, with relevant policies continuing to be considered in accordance with national planning policy. The Council also recognises the concern that applications which have previously been refused may be resubmitted during the plan making process. Each planning applications is considered by its individual factors and the development plan

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			as well as other relevant material considerations. The emerging Local Plan will become an increasingly important material consideration as it progresses through the plan making process and is consistent with national policy. It not considered necessary to introduce a separate mechanism to keep the existing Local Plan in effect during the review. The Council will continue to apply the relevant planning policies and national planning requirements when assessing applications during the transition period.
Haydn Payne (on behalf of the Caravan and		In taking forward the preparation of the local plan and when considering more detailed policies and proposals to include and sites to allocate, it is requested that the Blackpool South Caravan and Motorhome Club campsite (FY4 5LB) is allocated for	The Council acknowledges comments and has undertaken an assessment of each site

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Motorhome Club)		development. This site was identified in our Call for Sites submission in May of this year. The site, which extends to approximately 2.2 hectares, is located in south east Blackpool, close to the roundabout with the A5230 and Cropper Road, with vehicular access to the site off Cropper Road. The site falls within the Whitehills and Whyndyke Strategic Location for Development and is largely surrounded by allocated strategic sites; HSS1 - Queensway, St Annes (922 homes) lies to the west on the opposite side of Cropper Lane and MUS1 - Cropper Road East, Whitehills (529 homes) abuts the eastern and southern boundaries of the site. The existing Blackpool & Fylde Industrial Estate is less than 100m to the north west with additional employment land allocated under ES4 - Blackpool and Fylde Industrial Estate, Whitehills lies to the north west. Given that the site is unconstrained, available, accessible, located within a highly sustainable area and surrounded by existing allocations for development as well as being within a identified strategic development area, it is considered that the site has high potential for development and that it should be allocated for residential use within the emerging Local Plan.	that was submitted during the Call for Sites. As part of the SHELAA, sites were assessed to ensure they are suitable, available and achievable.

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Hilary Ayling		Unfortunately I have not had enough time to fill this form in as I would have liked, hence it being very sparcely completed. I have not hadtime to read it all. I hope what I have said has been of some use.	All comments have been read and understood.
Irene Jacques	Installation of solar panels on all,public buildings, eg libraries, council offices.		The Council prioritises sustainability and ensuring that new and existing development promotes sustainable development. Strategic Policy DSA1: Achieving Good Design in Development will state that development proposals should consider measures to mitigate the effects of climate change by the incorporation of energy and water efficiency in new and existing buildings and 'grey' water and rainwater harvesting. Adaptation to climate change should be achieved through the design and orientation of buildings

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			to maximise solar gain, minimise external surface areas of buildings across a development site by minimising the use of single detached buildings, provide shelter from the elements and take advantage of natural light and ventilation. Please refer to Policy for further information.
John Leadbeater		This is a useful exercise in local democracy but unfortunately it is likely to be by-passed by politicians and other vested interests - based on past experience.	The Council uses the comments received during the consultation to understand residents' views and future outcomes of the Borough.
John Maskell	Fylde inland from the sea is a rural area - this character should be maintained as much as possible. Historically some development has been skewed by the Planning Committee - local politics should have no place in the development of Fylde.		Comments noted. The Council notes that Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate

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			development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and natural environment, including nature conservation sites, heritage assets and local characteristics. Please refer to Strategic Policy DST1: The Development Strategy for further information.
Keith McKay		I would look forward to further engagement. We like being involved!	Comments noted.
Linda Nulty	Joined up thinking is essential please. Considering all the needs of ALL areas of Fylde Borough. Travel patterns, shopping and leisure patterns - not the assumption that LSA caters for the needs of the rest of	I have found filling this form in extremely difficult. No ability (that I can see) to start and go back to the form, which takes several hours when done properly. Consultation events could have recorded some	The overall strategy for directing where new development and investment will be

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	the borough - it does not. Affordable/ smaller housing available in all areas of the Borough	opinions to be followed up with a PAPER questionnaire with simple explanations of issues. I hope more events with more advertising and longer notice times will be held as this develops. Particularly as proposed development sites are considered - not covered in any depth in this consultation	located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environmental, social and economic assets. In particular, choosing the most sustainable locations for development will help mitigate the impacts of climate change. Encouraging a mix of uses on larger development sites and locating homes and businesses in close

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			proximity will reduce the need to travel. The decision on the strategy for development in Fylde needs to consider the amount of development needed, the sustainability of different development locations, the limits to the development of particular areas (constraints) and the availability of deliverable/developable sites. A decision is then needed on the balance of development between the different places. The Development Strategy retains the existing development strategy and builds upon it. 90% of additional housing development (over and above the amount already

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			committed) will be located at the four strategic locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is

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			reduced pressure for development at non-strategic locations. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Please refer to Strategic Policy DST1: The Development Strategy for further information. Strategic Policy HOU2: Density and Mix of

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			Housing will ensure that a broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. Please refer to Policy for further information. Regarding question 62, comments and notes will be taken forward.
Lytham St Annes Civic Society	Give planners more power to refuse redevelopment of existing properties based on character and quality. Once the Local Plan is in place it should be used by developers in the spirit it was intended and not be twisted to allow unsuitable developments. An example is using the increase in the number of bedrooms from 2 to 5 and saying this is participating towards a target of increasing accommodation available when in reality those five bedrooms will never all be used on a day-to-day basis and the redeveloped house will become too expensive for local families or downsizing older people to afford. Planners should have the authority to knock things back if they feel they fall outside the spirit of the		The new Fylde Local Plan to 2042 will establish the Council's proposals for how the area of Fylde will develop over the period between now and 2042, to provide the necessary homes, business and commercial premises, retail, leisure uses, and supporting infrastructure; but also

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	plan and which they feel would have a long-term negative impact on the local area. There should be a statement within the plan to the effect that everyone should work to ensure its spirit is maintained.		identifying areas that should be protected from development, such as important green spaces, areas important for nature, and areas where development should be restricted to retain the distinctive character of Fylde. Fylde has many attractive features and distinctive local characteristics which could be lost by allowing inappropriate development to take place in unsustainable locations. The role of the Local Plan is two-fold. Firstly it needs to plan for development and to allocate land accordingly in the Strategic Locations. Secondly, it is to provide policies for the protection of the Borough's built and

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			natural environment, including nature conservation sites, heritage assets and local characteristics. Access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. The broad profile of existing dwelling size in Fylde is that properties are, taken overall, slightly larger than the

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			average across the country. Across the Borough, 10% of the existing stock of dwellings have 1 bedroom, 28% have 2 bedrooms, 37% have 3 bedrooms and 25% have 4 or more bedrooms¹⁰. 1 bedroom dwellings are strongly concentrated in St Annes. The rural settlements have significantly fewer 1 and 2 bedroom dwellings. A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough. All developments of 10 or more dwellings will therefore be required to include at least 50% of

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			dwellings that are 1-, 2- or 3-bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural Settlements should include at least 33% 1- or 2-bedroom homes. Please refer to Strategic Policy HOU2: Density and Mix of Housing for further information.
P Stanford		I would like to see ALL planning committee meeting decisions as a named recorded vote. For public clarity and accountability, it seems only fair that the voting record is in the written public record.	Comment noted but not relevant to the Local Plan.
Stephen and Jacqueline Croft	When new developments are built, we see, time and again, cars parked all over the place because there is inadequate garaging and driveway/parking spaces. This causes hazards for moving traffic, refuse collection, drain and gulley clearing (which leads to flooding issues), pedestrians (as cars are parked on footpaths), wheel chair users, families with prams or pushchairs, users of walking frames or walking sticks.		Comments noted. The Council notes that car parking should, wherever possible, be provided on site so as to ensure there is no detrimental effect on highway safety.

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			A flexible approach to the level of car parking provision required will be applied, dependent on the location of the development concerned. Where the car parking provision necessary for a development proposal would result in harmful effects on amenity or highway safety in contravention of Policy DSA1, permission will be refused. Please refer to Non-Strategic Policy IFR6: Parking provision for further information. The adopted guidance for Fylde, in relation to car parking requirements in accordance with this policy, remains the Fylde Council Provision of Parking on New Developments Supplementary Planning

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			Document, notwithstanding change in its legislative status.
Steven Abbott		The answers above are made on behalf of Bradkirk Business Park Ltd and the landowners of Bradkirk Hall Farm as a whole - Mrs M. Towers, Messrs D and B. Towers.	Comments noted
Asteer Planning for Applethwaite	Comments on the Emerging Local Plan Evidence Base Housing Needs Survey (September 2022) 3.20 The Fylde Housing Needs Survey (2022) undertook an assessment of the affordable housing need across the borough. This found that within the 'rural east', which would cover Newton-with-Scales, that there is a total gross need for 58 social / affordable rented houses and a total gross need for 28 homes for affordable home ownership. 3.21 This reinforces the importance of allocating sites within the rural east area which have the capacity and deliverability to provide affordable housing provision to meet local needs, such as the site at Blackpool Road. 4 THE CASE FOR ALLOCATION 4.1 The site forms a logical extension to the settlement of Newton-with-Scales that is highly accessible and sustainable, with access to a range of services and facilities. The site is well-located to make use of existing public transport provision, with a bus stop on Blackpool Road adjacent to the site with services to Fleetwood, Blackpool, Wrea Green, Preston and Clifton via the no. 61 and no. 75 bus services. Blackpool Road also has a dedicated cycle lane on both	3.18 For the reasons set out above Applethwaite strongly consider that land at Blackpool Road represents a suitable and deliverable location for growth in Newton-with-Scales, which should be identified as a Tier 1 Larger Rural Settlement, as part of the emerging Spatial Strategy. The site forms a logical and sustainable extension to the settlement of Newton-with-Scales, is within single ownership, and has no constraints that would prevent it delivering homes early in the Plan Period. It has the potential to accommodate a sensitive landscape-led development that will contribute to the identified housing needs of the Borough and supports a growth strategy that direct the level of growth to Newton-with-Scales that will support its future vitality. 3.19 Applethwaite consider that the site should be considered as a crucial element of the emerging Local Plan's deliverable supply under any growth option that is pursued. Summary 3.22 In summary, Applethwaite strongly supports the preparation of a full new Local Plan which responds holistically to the new policy	The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The Fylde Housing Needs Survey 2022 (HNS) provides a clear indication of the sizes

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	sides of the carriageway which provides access into Kirkham and Wesham. 4.2 There are also two train stations in close proximity, with Salwick Train Station located around 2km northeast of the site with services between Blackpool South and Preston. Kirkham and Wesham Train Station is also around 2.7km to the north west of the site. 4.3 Having regard to the national and local planning policy context as set out in the previous section, it is considered that there is a strong case for allocating the site for residential development within the emerging Local Plan, based on: 1) The Council's significantly higher housing requirement introduced by the 2024 NPPF; 2) The opportunity to form a logical extension to the Newton-with-Scales settlement boundary that does not have a material impact on the area of separation; and 3) The inherent deliverability of the site; and 4) The key benefits that the site could deliver. 1. Meeting Future Need 4.4 There has been a significant increase in Fylde's LHN from 257 to 415 dwellings. The emerging Local Plan will need to allocate sufficient sites to meet the new LHN which will need to include a range of allocations across the Borough's sustainable settlements to ensure that a balanced spatial strategy is promoted, that encourages an appropriate level of growth in Tier 1 settlements that supports their future vitality. 4.5 The site presents an opportunity to allocate a logical extension to Newton-with-Scales which can contribute to meeting the Council's housing need, or which could be brought forward early in the Plan Period	environment and the increased housing requirement for the Borough. Fylde Council should pursue a balanced spatial strategy which focuses development on key strategic locations and sustainable settlements, including Newton-with-Scales which should retain its identification as a Tier 1 Larger Rural Settlement, which reflects its capacity for growth to support the existing services and facilities within the settlement. The site at Blackpool Road should be considered as a logical and appropriate extension to Newton-with-Scales to help meet the increased housing need across the Borough and deliver much-needed affordable housing in line with local needs.	and types of affordable housing needed. The HNS sets out a net need for affordable housing of 593 units per annum, made up of 418 units of affordable housing to rent (social rent, affordable rent) and 175 units of affordable housing to buy (shared ownership, discount market sales housing, rent-to-buy). However it qualifies this by noting that the relationship between affordable housing need and overall need for new dwellings is complex and that the two cannot be arithmetically linked, because many of those who fall into housing need are the result of churn in the private rented sector (principally through the threat of homelessness

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	to meet immediate housing needs. 2. Sensitive Extension to Newton-with Scales 4.6 As discussed previously, the site is afforded a high degree of physical and visual enclosure, with permanent physical feature characteristics of all of its site boundaries. It provides a natural rounding off to the settlement of Newton-with-Scales which would infill a logical site to the west of the existing residential area. In particular, there are prominent urbanising features which characterise the north and west of the site and provide existing physical and visual separation between the site and the settlement of Kirkham to the north west. To the south, Parrox Lane provides a strong southern boundary between the site and the open countryside as it extends southwards. 4.7 The site's surrounding physical context and potential for sensitive masterplanning would mean that the site would not have a material impact – visually or physically – on the separation between the settlements of Newton-with-Scales and Kirkham, forming a natural, logical and sensitive extension to the existing settlement boundary. 3. Deliverability 4.8 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable, and achievable and should be available to be brought forward within a realistic timeframe once a Local Plan is adopted. 4.9 Applethwaite is fully committed to the whole site and consider that it could be brought forward immediately to meet the		arising from the end of a tenancy). If the models are rerun to exclude those already in accommodation (and who would therefore release the accommodation by taking up a new home), the need becomes 85 units of affordable housing to rent per annum, and -43 units of affordable housing to buy. Although this approach provides a reality check to the extremely large numbers identified as net need, it is necessary to adopt an approach that recognises the Council's duties in respect of those households presenting who are in priority need, and the overall objective of meeting the

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	housing and employment needs of the Borough. Available 4.10 The site at Blackpool Road is in unconstrained freehold ownership and under the control of Applethwaite to be put forward for residential development, and is therefore readily available. Suitable 4.11 The site is entirely suitable for a residential development for the following reasons: • It is a logical and natural extension to Newton-with-Scales that would deliver a sensitive rounding off to the residential area to accommodate the required housing growth. • It offers an accessible and sustainable location for development that would support a balanced spatial strategy and which could be brought forward early in the plan period. • It would contribute positively towards meeting the increased LHN in Fylde through the delivery of high-quality market and affordable homes. • There are no known environmental or technical constraints that would prevent the development of the site. The proposals for the site will take a sensitive approach to design and incorporate any required environmental/technical mitigation measures. • It can deliver suitable vehicular access from Blackpool Road. • It offers the potential for biodiversity improvements and improved access to the countryside. Achievable 4.12 The site is achievable, in a single ownership, and with few development constraints from a technical perspective. The site is subject to an agreement with Applethwaite who are well-regarded and highly experienced development facilitators and housebuilders, based across the North West, Lancashire,		needs for all types of households. The Council will therefore seek affordable housing at a rate of 30%. Please refer to Strategic Policy HOU3: Affordable Housing for further information. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are:

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	Cumbria and the Yorkshire Dales. Applethwaite specialise in high quality residential development that is sympathetic to the local landscape and offers a range of home types from terraced to detached. They also facilitate bungalows within their developments which is somewhat unique among established residential developers of their size. The site can be brought forward within five years and assist Fylde in meeting their significant housing needs. 4. Key Benefits 4.13 The development of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided that supports economic growth in Newton-with-Scales and the east of the Fylde Borough. The delivery of the site will provide significant benefits to the Borough, to Newton-with-Scales and the existing community. These are summarised as follows: Economic Benefits 4.14 The development of the site will have significant economic benefits, both from its construction and occupation. Key economic benefits include: • Generating investment during the construction phase of development through construction cost, Full Time Equivalent (“FTE”) construction jobs and an increase in Gross Value Added (“GVA”). The scheme will generate construction investment and sustain construction jobs for the length of the construction programme, offering a recognised pathway into employment for registered unemployed residents in Fylde. • Providing long term occupation benefits including new resident expenditure, attracting new and high earning residents to Newton-		• St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations.

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	with-Scales, generating flow on and supported jobs and, overall, generating increased economic output in the Borough. • Generating significant revenue for the Local Authority, with a development of approximately 175 – 200 homes generating significant annual Council Tax revenue, and a New Homes Bonus. Creating Social Benefits and Social Inclusion 4.15 The delivery of the Site will have clear social benefits for existing and future residents, by providing greater choice for housing and amenities, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include: • Delivering high quality market homes to meet the needs of the Borough’s existing and future employees. • Delivering viable and deliverable affordable homes to address the Borough’s acute affordability crisis and support the housing of key workers and first time buyers. • Delivering new and accessible multifunctional open space, amenity space and green infrastructure to benefit existing and future residents and to improve connectivity to amenities at Newton-with-Scales. • Providing new residents to sustain demand for good quality public services and local social infrastructure in Newton-with-Scales. This increase in housing and inflow of investment will further encourage the retention of a working-age population in Newton-with-Scales which will encourage the realignment of the demographic disparity, providing long-term security for the settlement. Environmental Benefits 4.16 The site is currently arable farmland with limited biodiversity or recreational value.		Each site that was submitted as part of the Call for Sites has been assessed as part of the SHELAA, which identifies sufficient sites to meet needs that are suitable, available and achievable. Regarding question 62 comments have been noted. Development that is appropriate to the scale and character of settlements at each level of the settlement hierarchy, will be promoted in accordance with the Development Strategy. Tier 1 Larger Rural Settlements will comprise of Newton, Staining and Wrea Green. The Tier 1 Larger Rural Settlements have a range of basic facilities but are still dependent on sustainable transport connections to the

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	The development of the site has the potential to significantly uplift the biodiversity, accessibility and overall enjoyment and environmental value of the Site. Key environmental benefits include: • The site provides an opportunity to create new habitats for a range of species and deliver an uplift in biodiversity to meet Government targets. • The provision of multi-functional green infrastructure and open space that will benefit existing residents and create new, high-quality green corridors and open greenspace through the site. • The protection and enhancement of existing features on the site that add value, including mature trees, hedgerows on the site boundary. • Exploring the potential for improved accessibility to the open countryside and biodiversity enhancements to the wider site. • Embedding energy efficiency and zero carbon ready by design into the fabric of the development, and employing cutting edge new net zero technologies. 5 CONCLUSIONS AND RECOMMENDATIONS 5.1 In summary, Applethwaite strongly considers that the site at Blackpool Road should be allocated for residential development within the emerging Local Plan, and is fully committed to bringing the site forward for development. 5.2 In summary, Applethwaite consider that the site: • Is a suitable and deliverable location for growth in Newton-with-Scales, when considered in the context of all other growth options.		urban settlements for certain essential facilities.

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	• Should be considered as a crucial element of the emerging Local Plan's deliverable supply under any growth option that is pursued. • Is a logical extension to the settlement of Newton-with-Scales, which has the ability to provide a defined and defensible southern boundary to the settlement that will not materially impact on the area of separation between Newton-with-Scales and Kirkham. • Is available, achievable and suitable, and therefore, wholly deliverable in the context of the NPPF. • Can deliver a sensitive, landscape-led masterplan that delivers a range of social, economic and environmental benefits in the east of the Borough. 5.3 Applethwaite would welcome further engagement with the Council on the site, and are committed to robustly demonstrating the merits of the site as the Local Plan is progressed. We would be happy to provide further information or a meeting on the site, which can be facilitated via Asteer.		
Avison Young for National Gas		About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. Further Advice National Gas Transmission has appointed Avison Young to review and respond to local planning	Comments noted. The Council can confirm that National Gas are included on the consultation database

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		authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:	
Blackpool Council		Blackpool Council welcomes the opportunity to comment on the Options, Issues, Vision and Scope for the Fylde Local Plan to 2042. As a neighbouring authority with strong cross-boundary housing, economic, transport and environmental linkages, Blackpool Council considers it essential that close collaboration is maintained in accordance with the	Comments noted. Fylde Council are continuing ongoing cooperation meetings with neighbouring authorities including Blackpool Council.

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		Duty to Cooperate. Housing - Blackpool Council notes the reference to the significant increase in Blackpool's housing target under the new standard methodology. We are about to update the housing evidence base to inform the preparation of a new Blackpool Local Plan comprising a Housing Needs Assessment, Strategic Housing Land Availability Assessment and Green Belt Review which will help us to establish how much of Blackpool's housing need can be accommodated within the Borough. We therefore support ongoing discussions through the Duty to Cooperate regarding the potential to accommodate a proportion of Blackpool's unmet housing need if such need should arise in the future.	National policy as set out above notes that authorities should also plan for development needs that cannot be accommodated in neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed.
Defence infrastructure Organisation	As per our response to question 24, it is essential that the Local Plan supports future defence developments but also ensures the operational capability and capacity is not restricted as a result of third-party development proposed in the vicinity of a defence establishment. Accordingly, a military establishment policy should be included within the new Local Plan. We trust the above is of assistance and we would be grateful to receive further consultations as the Local Plan progresses and the opportunity to make further comments as necessary.		The Council places great importance on the retention and development of its aviation capabilities, particularly in relation to military aerospace and information. Policy DST5 restricts development to which is appropriate to a rural area and support agriculture, other

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			existing rural businesses and rural communities. The Policy will show where development in the Countryside, shown on the Policies Map, will be permitted, including development within the following sites in accordance with the relevant Local Plan policies: - Westinghouse Springfields secure site in accordance with Policy ECD2 - BAE Systems at Warton as set out in Policy ECD1 - MoD Inskip in accordance with Policy IFR3. Please refer to Policy for further information.

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			Strategic Policy ECD2: Westinghouse Springfields will ensure that proposals for development provide the retention and expansion of specialist advanced chemical processing on the Westinghouse Springfields site will be supported in principle providing it is compatible with other existing activity on the site. The Policy will also ensure that proposals for development within the vicinity of the Westinghouse Springfields site which could undermine or prevent growth of specialist advanced chemical processing on the site will be refused. The Council will consult the site operator on

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			new development proposals within the vicinity of the site. Please refer to Policy for further information. BAE Systems, Warton is a key national asset as a centre of advanced aerospace engineering and manufacture that is of strategic importance to national security and resilience. Strategic Policy ECD1: BAE Systems, Warton will ensure that Development proposals within the defined safeguarded area at Warton Aerodrome will not be permitted, unless the applicant can demonstrate that there would not be any potential for adverse impacts on aviation operations, or on defence navigation systems and

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			communications. Proposals for the development of the BAE Systems, Warton site to further develop or in support of the core activities on the site of advanced engineering and manufacture will be supported. Please refer to Policy for further information. Strategic Policy IFR3: Protection of Strategic National Infrastructure will provide protection for a number of strategically important facilities within the Borough of Fylde. Development, and mitigation measures for the impacts of development, will not be permitted where it would prejudice the safety of or restrict the

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			operation of strategic national infrastructure. The Local Plan will refer to national planning policy and guidance regarding defence and military establishments.
Emery Planning for Persimmon & Charles Church		1.1 Emery Planning is instructed to submit representations to the Fylde Local Plan Regulation 18 Draft (hereafter referred to as the 'LPR18) on behalf of the Persimmon and Charles Church Lancashire (hereafter referred to as 'Persimmon'). Persimmon has an interest on the land at New Hey Lane, Kirkham which is located to the east of the town. 1.2 In summary: •The new local plan should be prepared over a minimum 15-year period from adoption in accordance with paragraph 22 of the Framework. The Fylde LDS 2025 anticipates adoption towards the end of 2027, although this allows for no flexibility in terms of timescales and there is already slippage in terms of the current Regulation 18 consultation. The plan-period should be extended such that it allows for a minimum 15 years from adoption which we consider should be 2045.	Comments noted. All sites submitted during the Call for Sites were assessed and as part of the SHELAA were analysed for their suitability, availability and achievability. The emerging Local Plan will provide a framework for development over the period to 2042. This provides a plan period of at least 15 years from adoption and therefore meets the requirements of the National Planning Policy Framework.

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		• Fylde and Wyre should have a clear understanding of the housing figure they should meet under the DtC from Blackpool. The absence of such a figure in the current consultation should be addressed as soon as possible given the housing need/requirement and unmet housing need are clearly a strategic matter which require cooperation now. • Based on an end date of 2045 the minimum housing requirement for 2025 to 2045 would be 8,380 dwellings. As to the residual requirement to be met by new allocations, the Five-Year Housing Land Supply Statement 2024 (December 2024) sets out a supply of 3,935 dwellings for the period post 2025. These sites must meet the deliverability tests set out within the Framework to ensure the housing supply will be robust upon adoption. If they are deliverable the residual requirement to be met by new sites is at least 4,445 dwellings. This does not factor in meeting Blackpool's housing needs. • Kirkham should remain as a Key Service Centre and deliver a significant level of development. • The Area of Separation policies need to be reviewed in the context of meeting future development needs. If Areas of Separation are to be retained, then land should not be retained land where it is not necessary to maintain the strategic gap between the	Therefore, it is not considered necessary to extend the plan period to 2045. The Council will review the plan as it progresses and if adjustments are needed the Council will then act on this. The Local Plan will provide sites for a minimum of 6,656 new homes and a minimum of 24.49 ha (gross requirement) of additional employment land over the plan period to 31 March 2042. Please refer to Strategic Policy DST1: The Development Strategy for further information. National policy as set out above notes that authorities should also plan for development needs that cannot be accommodated in

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		settlements. • The land at New Hey Farm, Kirkham is being actively promoted by Persimmon Homes who have a positive track record of delivering sustainable residential development in Fylde and across the UK and is fully committed to the delivery of development at the site. 1.3 We would welcome engagement with the LPA on the points raised in these representations and on our proposed allocation of the site.7. Land at New Hey Lane, Kirkham Site Description and Area 7.1 The proposal site is 25.7 ha in size and is mainly rectangular in shape. It has a generally flat topography with some undulation at the centre of the site and a sloping terrain down towards Spen Brook in the north. The extent of the site, (as illustrated in Figure 04 of the Development Statement) extends from Kirkham Bypass in the south, to Spen Brook in the north. New Hey Lane bisects the centre of the site into two distinct parcels; Parcel 1 to the north of New Hey Lane, and Parcel 2, to the south of New Hey Lane. 7.2 The land north of New Hey Lane (Parcel 1) contains Daisy Meadow Farm, an extensive collection of farm buildings accessed off New Hey Lane. It comprises several agricultural fields bounded by	neighbouring areas. Further information relating to this matter will be added once the Statement of Common Ground has been agreed. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton;

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		mature trees and hedgerow. The nearby dwellings of Greenacres and Newlands fall outside the site boundary yet are enclosed by the red line. These properties are accessed via New Hey Lane which also serves access to Daisy Meadow Farm, The Coppins, Oakfield House and several other properties. 7.3 The land south of New Hey Lane (Parcel 2) is mainly void of development and predominantly comprises of agricultural fields and ponds. Fields are bounded by mature trees and hedgerow. Blackpool Road and Kirkham Bypass define the parcel's southern boundary. 7.4 We now set out the proposals for the land at New Hey Lane which can assist in meeting this residual need. Existing Policy Context 7.5 In the adopted Fylde Local Plan, Parcel 1 is designated as open countryside (GD4) and Parcel 2 is in the Area of Separation (GD3). The allocation identified in brown below has been constructed. In this location development to the east of Kirkham was considered appropriate and the proposed development would provide a further logical extension eastwards. 7.6 Below is a wider extract of the adopted policies	and • Kirkham and Wesham. The four strategic locations provide the most sustainable developable locations for development of strategic size. The conjoined settlements of the market town of Kirkham and the smaller town of Wesham represent a sustainable location for development, providing an extensive range of facilities, generally easily reachable from most parts of the settlements. The settlements are considered together as facilities in one are within easy reach of most parts of the other, including the town centre and secondary schools in Kirkham and the railway station in Wesham. Please refer to

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		map for Kirkham and Wesham. 7.7 Below is an extract from the EA Flood Map. 7.8 As can be seen the constraints around the town are: • Area of Separation to the west between Wrea Green and Kirkham; • Green Belt to the south; • Area of Separation to the east between Kirkham and Newton; • Flood Zone 2 and 3 between Kirkham and Wesham: and, • Open countryside to the north, east and west. 7.9 As part of the Local Plan Review, when the LPA is assessing options around the town the based on these designations, land north of New Hey Lane is the least constrained by policy, as it is designated as open countryside, and is outside the flood zone 2 and 3. 7.10 As to the land south of New Hey Lane, whilst it would reduce the existing gap, the proposals seek to continue to maintain the principles of openness, identity and distinctiveness within the local area, therefore mitigating the risk of development coalescence. This is achieved by sensitively preserving and maintaining separation between the ribbon development to the west of Newton with Scales along	Strategic Policy DST1: The Development Strategy for further information. Strategic Policy DST4: Areas of Separation has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements.

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		Blackpool Road, where development is set back behind existing landscape features to reduce any visual effect and create space and separation where it is visually unobtrusive, observing local topography as shown in the plan below. 7.11 Therefore, the development does not compromise the function of the Area of Separation in protecting the identity and distinctiveness of Kirkham and Newton. This is set out in greater detail in the Development Statement prepared by Urban Green which considers the following matters: • Landscape and Visual; • Access, Highways and Active Travel; • Masterplanning; • Ecology, including Biodiversity Net Gain; and, • Arboriculture. 7.12 The Key development parameters of the proposed development are: • 15.7ha of residential development, that could deliver between 400 - 600 new homes subject to density. • 10.2ha of green infrastructure comprising public open space, retained and improved woodland, water features, areas of play and landscape buffering. • Site access to be gained off Blackpool Road and a crossing point at New Hey Lane to connect both parcels	The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Please refer to Strategic Policy DST4 Areas of Separation for further information.

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		• Extensive retention of existing landscape assets including mature trees and hedgerow. • New links to adjacent neighbourhoods and to the Public Right of Way. • New Hey Lane to be incorporated as an Active Travel route. New pedestrian and cycle links to be located at the site edges. 7.13 The resulting Illustrative Masterplan is. 7.14 The proposal will provide a mix of housing types and sizes, to meet the housing needs of the area. This includes detached, semi-detached and terraced units. They range in size from the Alnmouth Mid Terraced House to the Tiverton Detached House. There will be housing opportunities for many different types of households. The house types have been selected from the Persimmon Homes range. Whilst there are recognisable characteristics that unite all house types (such as a palette of external facing materials) there is also considerable variety in terms of scale, material mixes, colour and building form. This gives interest across the housing parcels and it avoids an over concentration of homes of identical form and appearance. The development has a mix of character areas: 'rural edge' to the east; 'heart' in the central part of the site; and 'coastal' to the west. 7.15 The land is being actively promoted by willing	

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		landowners and is immediately available for development by Persimmon Homes who have a positive track record of delivering sustainable residential development in Fylde and across the UK and is fully committed to the delivery of development at the site at New Hey Lane, Kirkham. 7.16 There are no legal or ownership impediments to the site coming forward. There are no known environmental constraints which would prevent the site from being viably developed. The site can deliver housing in the first years of the new plan period at a rate of completions up to 45 per annum. 7.17 We therefore conclude that the subject site is a logical next step in meeting current and future housing needs for Kirkham and Fylde. 7.18 We trust that this clarifies our client's position. Should you require any further information at this stage, please do not hesitate to contact us.	
Environment Agency	Further comments Para 9.5 - Section 9.5 states that the existing local plan will follow the sequential risk-based approach to the location of development taking into account all sources of flood risk. However, it doesn't specifically state that this should also consider the current and future impacts of climate change on development sites. This is essential	Para 9.10 If developers are proposing to discharge surface water to watercourses, they will have to ensure that flood risk will not be increased elsewhere. Please note that since this is such a broad statement to 'add any further comments you have on the impact of flood risk on development sites', our comments are not	Comments noted. The Council notes that new development can be affected by climate change but offers the opportunity to design-in measures to avoid or

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	for ensuring that a development will stay safe for its lifetime and will not increase flood risk elsewhere, which is essential for site selection and in line with section 172 of the NPPF. Para 9.6 - Your Level 1 SFRA dated June 2024 assesses all forms of flood risk and presents the conclusions within the document. The Local Plan should include reference to the information developed within the L1 SFRA. A L1 SFRA as described in OIVS Section 9.6 is a starting point for presenting the flood risk issues requiring consideration in the Local Plan area and across boundaries study areas. The Environment Agency welcomes input and consultation on a Level 2 SFRA. This would provide the specific evidence needed for potential development sites, helping to inform the Sequential Test and provide guidance for the Exception Test if development is proposed in a flood risk area. It is important to note that New National Modelling was released in March 2025 resulting in changes to the Flood Risk maps. This should be taken into account within the Local Plan updates when referencing the L1 SFRA. Para 9.7 - In section 9.7 you have stated only small areas within the Local Plan are impacted by tidal flood risk. It is important to consider how aspects such as sea level rise as a result of climate change may impact the area in the future. There is also the consideration that sea defences will require renewal during the plan period in order to raise the sea defences to protect areas vulnerable to coastal flooding. This should be considered within the	inclusive of every aspect of flood risk that should be considered when assessing the impact of flood risk to proposed sites.	mitigate its effects at the outset. Therefore, the Local Plan can be instrumental in ensuring that future development is better equipped to deal with the impacts of climate as it will be in the future. Findings presented in the 2024 Level 1 SFRA have been used for the preparation of the Local Plan and when assessing potential sites. The Council is working with consultants to produce an updated Level 1 SFRA for the emerging Local Plan. The Framework requires that a sequential risk-based approach to the location of development will be taken, meaning that development will be directed to sites at

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	Local Plan. There are also challenges in the borough where areas at risk from flooding have a pumping station to control drainage, such as Red Bridge Pumping Station at Cropper Road. Resilience of a site should be considered in the case of pump failure and how this would be managed. The existing CL1 strategic policy incorporates Flood Alleviation, Water Quality and Water Efficiency as one policy. We would advise that a separate Flood Risk Policy is included in any revised / new plan to ensure the existing policy is expanded to fully include consideration of tidal and fluvial flood risk – including increased peak rainfall, peak river flow and sea level rise as a result of climate change. Para 9.9 - When considering sites vulnerable to flooding the Local Plan should consider how Natural Flood Management (NFM) can be used to reduce flood risk to a site. NFM can take many different forms and can be applied at different scales in urban and rural areas by altering the ways habitats, land, rivers, estuaries and the coast are managed. Fylde council can play an active role in NFM by including information that recognises and endorses the above co-benefits in their local plan and policies preparation. This can be achieved by developing specific policies and plans and working with us, the LLFA and other stakeholders to recognise the desires and opportunities for reducing flood risk, and viable options that NFM measures may present by working with natural		low risk of flooding. The sequential test requires that all sources of flooding are considered in making the assessment. All local planning authorities are required to conduct a Level 1 Strategic Flood Risk Assessment (SFRA) which assesses the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and how to address flood risk in development. Fylde Council together with the other Fylde Coast authorities Blackpool Council and Wyre Council undertook a Level 1 SFRA11 in 2024. The SFRA identifies flood risk areas for all types of

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	processes across the landscape to deliver and perform one or more of the primary functions relating to flood risk management be it increasing infiltration, slowing the flow of water, storing water and holding back sediment. It is recognised that NFM can also perform secondary functions to provide co-benefits such as habitat creation and biodiversity enhancement, soil improvement and retention, water quality improvements and carbon storage, and can create more valuable landscapes leading to recreation or tourism opportunities for the local and wider community. Equally, other initiatives, which have their primary objectives outside of flood risk management, can also provide a secondary co-benefit (e.g. biodiversity-driven projects can help reduce flood risk). Your SFRA L1 provides some guidance on Compensatory Flood Storage. Guidance should make it clear that Floodplain compensatory storage must not be used as a reason for developers or planning authorities to advocate floodplain development where lower risk alternatives are available. Where this may be necessary and unavoidable it should be accordance with the guidance: - CIRIA 624 (Development and flood risk – guidance for the construction industry - Section A.3.3.10, 2004) states that: “Compensatory flood storage must become effective at the same point in a flood event as the lost storage would have done (McPherson 2002). It should therefore provide the same volume and be at the same		flooding through a series of maps. As well as the potential for flood risk on site, development sites that are not themselves at risk of flooding can have the effect of contributing to increased flooding elsewhere, through increased runoff from the site. Attenuation measures through a sequential approach will be required to eliminate impact. Please refer to Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency and Strategic Policy CCH2: Surface Water Run-Off and Sustainable Drainage for further information. Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency outlines

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	level relative to flood level, as the lost storage". Finally, while fully anticipating that any sites allocated for development should avoid areas of high flood risk, it should be understood that development, and in particular the disposal of surface water from development, can impact on the receiving watercourses and lower lying areas at flood risk downstream. Major developments located in Flood Zone 1 can cause significant concerns from the public in relation to the perception of increasing flood risk elsewhere, and in some instances these concerns have been seen to be justified because of increased base and peak pass on flows which puts small watercourse and especially culverted systems under significant development pressures. As you are aware we are no longer a statutory consultee on the surface water aspects of development proposals. Providing detailed comments on the drainage strategy is not within our remit and we are not resourced to provide this service as part of our Flood and Coastal Risk Management function. Notwithstanding this, if it is apparent, or later becomes apparent that there is potential for surface water to have an impact, we could raise this with you as part of our strategic overview role to Local Planning authorities. With reference to our response to question 55, we would direct our strategic advice to the adoption of the standards and principles of the new National standards for sustainable drainage systems (SuDS) Updated 30 July		development requirements to minimise flood risk impacts on the environments, retain water quality and water efficiency, and mitigate against the likely effects of climate change of present and future generations. Please refer to Policy for further information. Strategic Policy CCH2: Surface Water Run-Off and Sustainable Drainage outlines sequential attenuation measures that new development must incorporate. Please refer to Policy for further information. The Local Plan will also include several Infrastructure and Transport Policies which highlights that a vital element of sustainable

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	2025, sets out 11 key principles, which has been strengthened for the benefit of net gains for nature or other multifunctional benefits as described.		development is the provision and delivery of local services and infrastructure. However, lack of infrastructure should not be seen as an obstacle to development. Planning should proactively drive and support sustainable economic development, and this includes the delivery of infrastructure. Additionally, the Framework requires that planning policies should seek to address potential barriers to investment, including any lack of infrastructure. Infrastructure comprises physical assets providing for a wide range of supporting service provision including, Water supply: storage, treatment and

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			distribution networks; Wastewater sewer networks and treatment works; Surface water drainage networks including flood storage measures; Flood defences and Coastal defences. The Council has prepared an Infrastructure Delivery Plan (IDP), which identifies infrastructure required by the Borough will be secured to support the development in the Local Plan and how it will be delivered. In doing this, it identifies issues of shortfall in existing infrastructure that present obstacles to the delivery of the Local Plan and how these will be overcome. The IDP also identifies gaps in funding which

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			will need to be met through developer contributions. Strategic Policy IFR1: Service Accessibility and Infrastructure outlines how proposals for development should protect and create sustainable communities. Please refer to Policy for further information. Non-strategic Policy IFR2: Developer Contributions highlights that Flood risk management and coastal defences (including strategic flood defence measures and local flood risk management measures) and sustainable drainage measures (both on site and borough wide, including the retrofitting of sustainable drainage

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			systems – SuDS; Enhancing the functionality, quality, connectivity and accessibility of the Green Infrastructure network – the network of natural environmental components and green and blue spaces (such as outdoor sports facilities, open space, including Fylde’s Coastal Change Management Areas, stretching from Starr Hills to Savick Brook in the south and along the River Wyre in the north, Lancaster Canal, parks, allotments, play areas, enhancing and conserving biodiversity and management of environmentally sensitive areas) and Climate change and energy initiatives are all types of infrastructure

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			that developments may be required to provide contributions towards (but not limited to). Subject to viability, development will normally be expected to contribute towards the mitigation of its impact on infrastructure, services and the environment and contribute towards the requirements of the community. Contributions will be secured through a planning obligation. Please refer to Policy for further information. Regarding question 62 comments have been noted. The Framework requires that a sequential risk-based approach to the location of development will be taken, meaning that development will be

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			directed to sites at low risk of flooding. The sequential test requires that all sources of flooding are considered in making the assessment. In addition to the areas affected by coastal and fluvial flooding, surface water flooding can affect many areas. Surface water flooding occurs when intense or prolonged rainfall leads to water collecting on the surface in certain areas. Due to Fylde's low lying gently undulating terrain, areas affected are very widespread, throughout the Borough, and most if not all fields have an area where surface floodwater collects. Therefore, it has been assumed that all allocated sites that are

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			potentially at some risk of surface water flooding. The Council has therefore commissioned a Level 2 Strategic Flood Risk Assessment, in support of the Local Plan, to ensure that completed developments will not be at risk of flooding. Please refer to Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency for further information.
DLP Planning for BAE Systems		I trust the above is clear and satisfactory; however, if you have any queries or would like to discuss the above, please do not hesitate to contact me using the details below. BAE Systems would welcome a meeting with the Council to discuss the above representations and in particular any support that can be provided in the emerging Local Plan for the growth and development of Warton Aerodrome, including the exceptional circumstances for a localised amendment to the Green Belt boundaries at Warton Aerodrome. I would be grateful if you could acknowledge receipt	Comments noted.

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		of these representations and confirm that they have been duly made. Please note that BAE Systems retains the right to amend, add to, or withdraw these representations, if necessary.	
Gladman		Context Gladman Developments Ltd ('Gladman') welcomes the opportunity to comment on the Options, Issues, Vision and Scope consultation for the Fylde Local Plan to 2042 and requests to be updated on future consultations and the progress of the emerging Local Plan. Gladman specialises in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in contributing to the development plan preparation process, having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman was involved throughout the plan-making process of the adopted Fylde Local Plan to 2032 (incorporating Partial Review). As part of the preparation of the emerging Local Plan, Gladman has responded to the ongoing Call for Sites exercise. Gladman has land interests in Fylde. Land off Bryning Lane, Warton is currently being promoted through the emerging Fylde Local Plan to 2042. The site is available, suitable and deliverable for housing as summarised in the site submission at Section 5. Gladman is keen to engage	Comments noted. The Council visited the site and the surrounding area and conducted a site and desk based study during the Call for Sites and SHELAA exercise.

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		further with the Council as the plan-making process progresses. SITE SUBMISSION 5.1 Land off Bryning Lane, Warton Introduction 5.1.1 Gladman is promoting Land off Bryning Lane, Warton for residential development. A Site Location Plan is included at Figure 1 below. This site submission should be considered in conjunction with the information submitted by Gladman to the Council's 2025 Call for Sites exercise. Gladman considers that the site could come forward either in part or as a whole. Should the Council choose to allocate only part of the site, Gladman submits that the first three fields, travelling east from Bryning Lane, would be appropriate for allocation in the first instance. Gladman submitted an outline planning application on these fields for up to 155 dwellings in June 2019 (application reference: 19/0461). The application was not determined by the Council, and it was finally disposed of in June 2024. Figure 1: Site Location Plan – Land off Bryning Lane, Warton Site Context and Surroundings	

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		5.1.2 The site measures approximately 12 hectares and is located on the northern edge of Warton. It is made up of agricultural fields and is largely enclosed by trees and hedgerows. To the north of the site lie Kellamergh Park, the home ground of AFC Fylde Women, and agricultural fields. In addition, the site is bounded by agricultural fields to the east, Hillock Lane to the south and Bryning Lane and the Birley Arms to the west. There is some residential development to the north-west of the site and a large-scale residential scheme on the opposite side of Hillock Lane on land that was allocated in the adopted Local Plan. Clearly, the site is located in the direction of growth around Warton. 5.1.3 Warton has a number of facilities and services that are within acceptable walking and cycling distance of the site including convenience stores, primary schools, pubs, a post office and a church. There are also a number of further amenities within nearby Freckleton. The site is well located to facilities and services to meet day-to-day needs. 5.1.4The nearest bus stops to the site are located to the south-west on Church Road. The no. 76 bus service runs regularly and connects Warton with Blackpool, Poulton-le-Fylde, Lytham, St Annes and other locations. For residents of the site, travelling by	

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		bus would be a realistic and sustainable option for both commuting and recreation. Lytham railway station is the closest to the site and can be accessed via the no. 76 bus service followed by a short walk. It has regular services to Preston and Blackpool South stations. The public transport connections available allow access to settlements that host a wider range of facilities and services and mean that long-distance travel is a viable option for potential future residents of the site. 5.1.5 In recognition of Warton's suitability and sustainability, the Council directed 1,305 dwellings to the settlement over the current plan period. Gladman considers Warton to be capable of accommodating a proportionate level of housing growth again over the emerging plan period. Gladman submits that the site represents a suitable and sustainable location for housing around Warton. New Homes 5.1.6 The site is deliverable in the short term and will help to increase the supply and choice of housing in Warton. It is capable of delivering a wide range of market and affordable homes to meet the borough's needs. There is potential to deliver a significant number of dwellings, including a policy compliant level of affordable housing. The development of the	

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		site would contribute significantly towards the Council's affordable housing supply requirements, without subsidy, and would provide people with the opportunity to have an affordable property to call their own in a location that is currently unaffordable for many local people. 5.1.7 Furthermore, development of the site would contribute towards economic growth and have wider social benefits to the local community including increased footfall for existing businesses, helping to sustain their vitality. Landscape 5.1.8 The site is not subject to any landscape quality designation and lies outside of the Green Belt and Areas of Separation. It is anticipated that the landscape character of the site and immediate context has the ability to accommodate a high-quality residential development, including extensive green infrastructure proposals. Highways 5.1.9 Access to the site is proposed via a new junction on Hillock Lane. It is anticipated that the required visibility splays can be achieved and that the site access junction will operate comfortably within	

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		capacity in both peak periods with the proposed development traffic. Heritage 5.1.10 There are no designated heritage assets within or immediately adjacent to the site. Therefore, it is anticipated that the proposals will not adversely affect the setting or significance of any heritage assets. Flood Risk 5.1.11 The majority of the site falls within the Environment Agency's Flood Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability or <0.1% chance of flooding from rivers or the sea). In accordance with national planning policy and guidance, the site can be sequentially developed to avoid all potential sources of flooding. Furthermore, the risk of flooding elsewhere will not increase as a result of the development of the site. Other Technical Matters 5.1.12 It is anticipated that the development of the site will not give rise to any unacceptable impacts in relation to other technical matters. Green Infrastructure	

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		5.1.13 Green infrastructure will form an integral part of the proposals and contribute positively to the site's landscape character, enhance biodiversity and provide community benefits through the provision of public open space and recreational facilities. Financial Contributions 5.1.14 Financial contributions towards any necessary infrastructure requirements arising as a result of the development will be secured via planning obligations following the grant of any planning permission. Conclusion 5.1.15 Gladman submits that Land off Bryning Lane, Warton is a suitable, available and deliverable site that will enable the Council to meet the need for new homes in the first five-year period of the emerging Fylde Local Plan to 2042. CONCLUSIONS 6.1 Summary 6.1.1 Gladman welcomes the opportunity to comment on the Options, Issues, Vision and Scope consultation for the Fylde Local Plan to 2042. These representations have been drafted with reference to the revised NPPF (December 2024) and PPG.	

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		6.1.2 Gladman has provided comments on a number of issues that have been identified in the Council's consultation material and recommends that the matters raised are carefully explored during the next stage of the plan-making process to ensure the emerging Local Plan meets the test of soundness set out in the NPPF. 6.1.3 We hope you have found these representations informative and useful towards the preparation of the Fylde Local Plan to 2042. Gladman welcomes any future engagement with the Council. If you would like to discuss our representations or other matters, please contact us at policy@gladman.co.uk.	
Historic England	No comment at present.	Implications for the Local Plan comment (page 10): We welcome recognition of the positive implications that the heritage assets can make to the Borough. It is important that not only are they protected (as mentioned) but opportunities for their enhancement should be included as well. Implications for the Local Plan comment (page 12): – Bullet 2 - makes reference to 'key assets'. it is unclear whether this is historic or not (reference is made to the picture and the content of Para 2.17) for example. Issues for the Local Plan comment (page 14):	The emerging Local Plan aims to provide policies to conserve and enhance the natural, built and historic environment. The Council notes that the success of the Borough as a visitor destination and as an attractive place to live and work depends significantly on the

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		Bullet 1 should read: Protection and enhancement of the historic assets environment and character. New bullet: Sustaining and enhancing character and identity Issues for the Local Plan - Comment (page 16): The Local Plan should also seek to enhance rather than just protect. Issues for the Local Plan - Comment (page 20): The Local Plan should also seek to enhance rather than just protect. Issues for the Local Plan - Comment (page 21): The Local Plan should also seek to enhance rather than just protect.	protection of the valued heritage assets, which should be an important element of the Local Plan. Strategic Policy ENT1: Historic Environment will ensure that proposals for development should conserve, protect and, where appropriate, enhance the character, appearance, significance and historic value of Fylde's designated and undesignated heritage assets. Please refer to Policy for further information. The Council will take other actions in support of the protection of heritage assets: • Continue to implement the Built Heritage Strategy for Fylde.

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			• Promote heritage-led regeneration including: enhancing the commercial and resort core of St Annes to enhance the vibrant seaside resort; protecting and enhancing the heritage of Lytham; and revitalising the commercial core of Kirkham. • Produce Conservation Area Appraisals and Management Plans • Identify opportunities to promote the district's heritage assets through tourism, culture and economic development • Seek to identify further local heritage assets • Seek opportunities for safeguarding the future

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			of any heritage assets at risk • Work with partners to improve and manage the public realm in historic areas.
Home Builders Federation	Other Matters 43. The new Local Plan will need to contain policies which address biodiversity net gain (BNG). Whilst the PPG is clear that there is no requirement to include policies which duplicate the de-tailed provisions of the national statutory framework, plan-makers are able to complement the statutory framework for BNG by including policies which support appropriate local offsite biodiversity sites. This includes whether specific allocated sites for development should include biodiversity enhancements to support other developments and meet their net gain objectives in line with Local Nature Recovery Strategies (Reference ID: 74-006-20240214). 44. The HBF would recommend having this local aspect of BNG covered within the new Local Plan to assist our members in bringing forward their sites for new homes. 45. Throughout these representations, the HBF has placed great importance on ensuring the policies and requirements of the new Local Plan are robustly tested in terms of viability and this should be a core element of	Future Engagement 47.The HBF trusts that the Council will find these comments useful as it continues to progress its Local Plan. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. 48.The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.	Comments noted. The Local Plan will not contain specific policies that address Biodiversity Net Gain (BNG) however the Plan will contain several policies that Protect Environments and Assets. The Council is developing a separate guidance document for applicants which provides support to BNG. The Council will provide support to assist members in bringing forward their sites for new homes.

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	the plan making process which runs through all aspects of the new Local Plan. 46. Finally, it will be important that any new Local Plan contains an implementation and monitoring section which explicitly outlines the precise measures that will be taken if policies within the new Local Plan do not deliver as expected (eg. in the event that the Council can no longer demonstrate a five year supply of deliverable housing land).		The Council will monitor the delivery of housing and planning permissions granted to ensure that it maintains a five-year housing land supply based on the annual housing requirement of 416 net dwellings per annum over the plan period. Please refer to Strategic Policy HOU1: Housing Requirement and Supply for further information. Regarding question 62 comments have been noted. The Council will keep those required informed and involved.
Homes England		Homes England Response As a prescribed body, and landowner in Fylde, we would firstly like to thank you for the opportunity to comment on the above consultation. Homes England is the government's housing and regeneration agency. We will drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of	Comments noted. The Development Strategy for the new Local Plan will retain the existing development strategy and build upon it. 90% of additional housing development (over and

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		communities across England and the creation of places people are proud to call home. Homes England would like to express its support for the efforts of Fylde Council in preparing a Plan for the future needs of the Borough and wish to continue to engage with the Council as the Plan progresses. Homes England does not wish to make any representations on the specific Issues, Options, Vision and Scope contained within the above consultation. However, would like to express its support for the preparation of Plans to ensure that long term housing needs and economic growth ambitions are met in full. Homes England owns land at Land off Old House Lane, Marton which forms part of a wider strategic site allocation MUS1: Cropper Road East, Whitehills in the Fylde Local Plan to 2032. The allocation is within multiple ownerships of which 11.22 hectares is owned by Homes England. Homes England's land was granted outline planning permission on the 31st July 2024 (subject to s.106 agreement) for the following: Outline planning application (access applied for with all matters reserved) for residential development of up to 266 dwellings following demolition of existing buildings, including provision of electricity substations, public open space, landscaping, drainage and other associated infrastructure (LPA Reference:	above the amount already committed) will be located at the four strategic locations for development. This allows for continued growth at each of the four locations, following on from existing and committed growth. The spread across four locations would mean that sufficient sites would be brought forward to ensure sufficient housing delivery, so that the housing delivery test is met. Development at four strategic locations will mean that there is reduced pressure for development at non-strategic locations. The four strategic locations in the existing Local Plan have resulted in a broad base of housing delivery over

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		23/0867) Homes England is currently in the process of securing a developer partner to bring the site forward for development. The Issues & Options document comments that there remain strategic sites still to be delivered fully in each of the four strategic locations, which includes the strategic allocation MUS1. It therefore proposes that any development strategy going forward will need to take account of the existing committed/allocated sites at the four strategic locations in the existing Local Plan. Homes England supports this approach and the continuation of support for residential development at land off Old House Lane and remains committed to working with the Council to fulfil the housing growth ambitions within the new Local Plan.	the period since the plan was brought forward. The spread of sites across the four locations has meant that there has not been any evidence of over-supply at a single location, which would constrain delivery: instead, the strategy has been effective in ensuring that delivery has been maintained. The Council will continue to work with Homes England and keep them informed and involved.
Lancashire County Council	Hot Food Takeaways Whilst obesity is a complex issue, the link between hot food takeaways, as part of the obesogenic environment, and the impact on people's weight is increasingly becoming apparent. The NPPF (2024)¹ states "Local planning authorities should refuse applications for hot food takeaways and		Comments noted and agreed with the provided statement. The Draft National Planning Policy Framework states under HC5: Hot food takeaways:

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	fast-food outlets: a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour". Both nationally and locally, planning authorities are actively utilising planning policy to restrict new hot food takeaways in an equitable and targeted approach to addressing obesity. Policy recommendations from the Lancashire County Council's Hot Food Takeaways and Spatial Planning Public Health Advisory Note , restrict new hot food takeaways within defined areas around secondary schools and within wards that meet defined obesity thresholds. Public Health have successfully objected to planning applications for new hot food takeaways across Lancashire districts where these recommendations have been reflected in adopted Local Plans. The Fylde Healthy Living SPD12 recognises that "takeaway foods have become increasingly popular and are considered to be a key driver in increasing levels of excess weight and obesity due to their high levels of sugar, salt and fat, as well as low levels of micronutrients."		‘1. Development proposals for hot food takeaways should be refused: a. Within reasonable walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or b. In locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour.’ Therefore the Council will follow this guidance. In order to avoid duplication of National policy, the Council has decided to not include a specific policy surrounding healthy

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	Given these concerns the Fylde Health Living SPD12 states that "Planning applications for A5 use classes (Hot Food Takeaway) will be assessed in relation to all of the following principles:" • "A restriction on new A5 uses within wards where more than 15% of year 6 pupils or 10% of reception pupils are classed as obese." • "A 400m control zone surrounding secondary schools - ...Preventing the development of new hot food takeaways around secondary schools limits access for children with financial ability and time spent outside of the school during school hours and can have a positive impact on eating choices" • "In the wards with less than 10% obesity in Reception Class children, hot food takeaways will only be permitted where they do not result in a clustering of hot food takeaways in deprived areas - ...Consideration should be given to the location of new hot food takeaways outside town centres to prevent over proliferation in certain deprived areas...and to discourage residents from making unhealthy food choices." (Point 5.15; pg 31-32). As of 2025, Fylde has 72 hot food takeaways. This equates to a 12.5% increase since the previous year . Recent data (2023/24) highlights that in Fylde 66.8% of adults (aged 18+), 29.9% of Year 6 children (10–11-year-olds), and 21.4% of Reception-age children (4–5-year-olds) were classified as overweight (including obesity) , .		lifestyles in the emerging Local Plan. Encouraging healthy lifestyles will be implemented throughout the emerging Local Plan such as encouraging active travel. The existing policy surrounding this within the existing Local Plan would not align with the current framework therefore the policy has not been carried forward. However, the Council agrees with Lancashire County Council and acknowledges the importance of healthy living and the link between hot food takeaways, as part of the obesogenic environment, and the

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	In Fylde, the prevalence of obesity (including severe obesity) amongst Year 6 children is higher in the 20% most deprived areas compared to the 20% least deprived areas (21.2% vs 12.2%; 2019/20 to 2023/24) . Aligned to the requirements of the National Planning Policy Framework and to reflect the recommendations set out within Hot Food Takeaways and Spatial Planning Public Health Advisory Note¹⁴, Public Health recommends the following is incorporated into the Fylde Local Plan to 2042: 1.Refusing new sui generis hot food takeaway uses and fast-food outlets within wards where the most recently published NCMP data classifies 10% or more of Reception pupils or 15% or more of Year 6 pupils as obese (including severely obese). Rationale: Aligns to NPPF requirement to refuse applications for hot food takeaways and fast-food outlets in locations where there is evidence that a concentration of such uses is having an adverse impact on local health. Achieving the Government's goal of halving obesity would mean reducing the prevalence of obesity amongst Reception pupils to 5%, and amongst Year 6 pupils to 10%. The percentage triggers proposed are 5% above this target for each year group.		impact on people's weight.

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	2.Refusing new sui generis hot food takeaway uses and fast-food outlets within a 400m radius of entry points to schools and other places where children and young people congregate. Rationale: Aligns to NPPF requirement to refuse applications for hot food takeaways and fast-food outlets within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre. 400m is an approximate 5-minute walking distance . For further information, data, and evidence regarding the link between hot food takeaways and obesity, please see the attached Hot Food Takeaways and Spatial Planning Public Health Advisory Note¹⁴. Please note that the version of this note published in July 2024 is currently being updated. A new version will be published in November 2025 to align the recommendations to the most recent version of the NPPF.		
Lichfields for Taylor Wimpey	Conclusion Taylor Wimpey welcomes the emerging Fylde Local Plan consultation efforts and supports the Council’s overarching objective to deliver a Local Plan that stimulates economic growth, facilitates delivery of essential housing development, and enhances the quality of life for residents in the Borough. It is considered that	Introduction Taylor Wimpey has a longstanding land interest in the site at Weeton Road, Wesham, and has engaged in actively promotion of the site as a suitable residential allocation through the Call for Sites consultation. As part of this process, a comprehensive masterplan was submitted, outlining the potential to deliver up to 650	Comments noted. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under

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	the preparation of a new Local Plan will best support these aims and ensure that an up-to-date evidence base accurately reflects the Borough's evolving context and housing needs as opposed to a partial review. The emerging housing requirement must be consistent with Local Housing Need (LHN) as calculated using the Standard Method (plus a degree of flexibility to account for some change over time), and this should be treated as a minimum baseline. It is also critical that the plan period extends for at least 15 years from the point of adoption in accordance with national planning policy. Taylor Wimpey is committed to delivering attractive, well-designed housing developments with distinctive character and a choice of high-quality homes. The Land at Weeton Road, Wesham has the potential to deliver up to 650 market and affordable homes, offering a mix of types, tenures, and sizes to meet local need. These homes can be delivered via a phased strategy over the course of the plan period, assisting the Council in meeting its housing requirement, particularly in light of its diminishing supply position. Careful masterplanning shown on the submitted Illustrative Masterplan demonstrates how the site can form a sustainable and logical extension to Wesham, continuing the pattern of development endorsed by the Council throughout the current Local Plan period.	homes across Taylor Wimpey's landholdings to the north and south of Weeton Road in a phased manner. A Delivery Statement accompanied the submission, demonstrating the deliverability and suitability of the site as a logical and sustainable extension to Wesham. These materials are resubmitted as part of this representation. For clarity, the credentials of the site as a suitable residential allocation are summarised below: • The site extends to 30.95 hectares and comprising two main parcels to the north and south of Weeton Road. • The site has capacity for up to 650 homes, with c. 430 to the north and 220 to the south. The development will offer a mix of high-quality homes, with varied types, tenures, and sizes to meet local housing needs. This would also include policy compliant affordable housing provision. • The site is well-located in relation to local services, facilities, employment, and education opportunities, supporting its role as a sustainable urban extension to Wesham. • The site is available and under option to Taylor Wimpey. It can be delivered in a logical, phased manner over the plan period, with an estimated build-out of 10–12 years, contributing to a sustained housing supply for Kirkham, Wesham, and the wider	government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. All sites submitted during the Call for Sites have been assessed as part of the SHELAA to analyse the suitability, availability and achievability. All sites submitted during the Call for Sites alongside accompanying documents have been assessed as part of the SHELAA to analyse the suitability, availability and achievability.

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	We trust that these representations will be fully considered in the formulation of the Local Plan Review. We would be grateful to be kept informed of the next stages of consultation and welcome the opportunity to discuss the promotion of the Weeton Road site in further detail.	Fylde Borough. • An initial masterplan has been prepared, informed by technical surveys which confirming the deliverability of the site. Following the Call for Sites submission earlier this year, Taylor Wimpey submitted an outline planning application for up to 250 dwellings with associated infrastructure (all matters reserved except access) on 10th July 2025 (LPA ref. 25/0413). This application is currently pending determination and would constitute the first phase of development at Weeton Road. The outline application has however been carefully designed to futureproof the wider site, ensuring alignment between the current proposals and the strategic objective of securing residential allocation for the full extent of the promotional land in the emerging Local Plan.	
Marine Management Organisation		Summary notes Please see below suggested policies from the North West Marine Plan that we feel are most relevant to your local plan. We recommend considering reference to these policy areas within the supporting policy text. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a	Comments noted. The Council acknowledges the importance of marine planning and understands its statutory role in determining planning applications within the area it covers. However,

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		recommendation, and we would suggest your own interpretation of the North West Marine Plan is completed. • Infrastructure: NW-INF-1, NW-INF-2 • Employment: NW-EMP-1 • Seascape and Landscape: NW-SCP-1 • Social Benefits: NW-SOC-1 • Tourism and Recreation: NW-TR-1 • Climate change: NW-CC-1, NW-CC-2, NW-CC-3 • Biodiversity: NW-BIO-1, NW-BIO-2, NW-BIO-3 • Invasive Non-Native Species: NW-INNS-2 • Disturbance: NW-DIST-1 • Renewables: NW-REN-1, NW-REN-3 • Heritage Assets: NW-HER-1 • Water Quality: NW-WQ-1 • Air Quality and emissions: NW-AIR-1 • Cross-border co-operation: NW-CBC-1 Further points to note We would recommend you mention the adopted North West Marine Plan as a document for material consideration. Under the Marine and Coastal Access Act, any authorisation or enforcement decisions must be made in accordance with the marine plan. Any other decisions which may impact the marine area must have regard to the marine plan. We welcome the advice that applicants may also require an appropriate	it is not considered beneficial to repeat and reference sections of the North West Marine Plan within the Local Plan. The Marine Plan is a statutory document within its own right and the Council will refer to the document when needed therefore it is unnecessary to include parts of it within the emerging Local Plan.

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		license from the Marine Management Organisation. We would recommend the mention of the Marine and Coastal Access Act in your local plan. The UK Marine Policy Statement is the framework for the marine planning system. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine areas must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan (your area being the North West Marine Plan) or the UK Marine Policy Statement unless relevant considerations indicate otherwise. We would also welcome reference to the need for an integrated approach between marine and terrestrial planning to address strategic cross-boundary matters in Sustainable development, Flood risk and water management and Climate adaptation, and where you mention the use and green infrastructure. This will help fulfil your authorities' duties under the Duty to Cooperate and Section 58(3) of the Marine and Coastal Access Act. A general incorporation of blue infrastructure/spaces throughout, alongside green infrastructure/spaces would show recognition of the north west marine plan areas. As previously stated, these are recommendations, and we suggest that your own interpretation of the draft	

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		North West Marine Plan is completed. We would also recommend you consult Explore Marine Plans, our marine planning portal, for further information. With you being in the early stages of plan development, if you would find it useful, It would be great to schedule a meeting to further discuss the links between your local plan development and marine planning. I envisage this meeting focusing on the links between the priorities in your local plan and the ways in which the North West Marine Plan can help to deliver these.	
National Highways	Q61. It is acknowledged at this early stage of the LP process that policies are to be developed further following feedback from stakeholders, local residents and local businesses. It is important that the role of the SRN, supporting the proposals for borough, is included. As the LP develops, National Highways should request early and ongoing engagement of the Fylde Infrastructure Delivery Plan to ensure that the strategic proposals that are to be taken forward in the LP support the resilience and safe operation of the SRN.	Comment 5-03 Whilst not specifically addressed in the draft document, it is recommended the council provide clarity on the spatial distribution of proposed accommodation for these groups, especially where they are directly adjacent to or have access to the SRN, notably near M55 Junctions 3 and 4. Comment 7-02 It is recommended that any development within these boundaries be discussed with National Highways, especially settlements located close to or which may access the SRN. Comment 7-07 It is not expected that the protection of open spaces could impact the resilience and safe operation of the SRN.	Fylde Council acknowledge feedback from stakeholders, local residents and local business and use responses to shape policies. Fylde Council continue to engage with National Highways and have recorded email exchanges and outcomes from meetings. The Council continues to engage with National

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		Q62. An indication of timescales for the production of the LP is requested to ensure that National Highways can provide comment at the required timeframes. It is noted that the draft LP does not acknowledge cross-boundary impacts with the adjoining local authorities. It is requested that FBC address cross-boundary impacts as the LP develops.	Highways, Lancashire County Council Highways and Blackpool Council regarding local highways and M55 Junction 3 and 4.
Network Rail		Tall Buildings Obviously NR would need to be consulted as usual on all respective individual applications but we have provided a summary of requirements with examples, that may be useful in any development of a tall building strategy. Items to consider and consult with include but are not limited to: 1. Tower and Mobile Crane Collapse and other plant overturning 2. Boundary Security and changes to land usage increasing the trespass risk or likelihood of missiles/objects being thrown onto the railway 3. Effect of any development loading applied to any Network Rail asset or slope. Also significant alterations to wind effects. 4. Maintenance of Railway Assets & slopes and maintenance of Development Assets 5. Railway electrification and guarding the development against this electrification hazard 6. Slope stability and change of slope stability risk due	Comments noted.

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		to changes adjacent or close to the railway 7. Ground Movement and Vibration damage 8. Increase Flood risk 9. Alteration to the ability of the railway GSM-R radio network to allow rail traffic to remain within transmission. Same for Train Connectivity and Information Systems (train internet network) 10. Signal sighting and Glare to train drivers 11. Electromagnetic Compatibility (EMC) issues 12. Access to and visibility of Stations 13. Access to railway access points and railway depots 14. Ability to construct the development whilst not damaging or adversely loading any Network Rail assets 15. Party Wall issues and oversailing costs NR has the rail networks as shown in the SPD but also more routes not shown and some unused route that remain key to future rail strategy and will therefore receive our protection. Many route are electrified by either third rail or overhead electrification or have plans to be electrify in the future. Note the collapse radius of a Tower Crane which is likely to result in Network Rail needing to be consulted on most tail building schemes. Other items will need addressing as the development proximity to a rail route reduces, see the website and examples below: https://www.networkrail.co.uk/communities/lineside-neighbours/working-by-the-railway/	

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		Example 1 - Over a non-electrified Railway Tunnel We are authorised to allocate a Network Rail Interface Manager for your scheme. Network Rail costs would be recovered under a Basic Asset Protection Agreement between the development client and Network Rail. The Network Rail Interface Manager would also make arrangements for any necessary surveys. It is anticipated that due to the nature of the interface it will be necessary for the Engineers appointed to enter into an Engineering Assurance process with Network Rail to demonstrate that the development will not impact on the railway, the process is further outlined below. The formal Railway Engineering Assurance process is described in NR/L2/CIV/003 Design, Construction and Maintenance of Civil Engineering Infrastructure. Components are as follows: Approval in Principal outlining the applicable design standards and other requirements (otherwise known as Form A) Detailed Design Certificate (Form B) See extracts from attached Network Rail guidance document titled 'Guidance for development above/adjacent to railway tunnels' for information. Please also note that no soakaways are to be constructed within 50m of the railway tunnel. Extracts from 'Guidance for development above/adjacent to railway tunnels'	

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		Network Rail's Engineer is to approve details of any development or works within 15 metres, measured horizontally, from the outside face of the tunnel extrados with special reference to: a. The type and method of construction of foundations b. Any increase/decrease of loading on the tunnel both temporary and permanent. Certified proof that the proposals shall have no detrimental effect upon the tunnel will be necessary. All drainage from any development must be taken away in an approved sealed pipe system. No soak ways are to be constructed within 50 metres of the tunnel. Drainage details must be submitted for Network Rail approval. Example 2 - Adjacent to OLE Railway Viaduct It is noted that the proposed multi-storey development is adjacent to the electrified railway viaduct including. Rail traffic on this busy rail corridor includes freight and passenger trains. 1. Network Rail requests that the developer ensures there is a minimum 6m gap between the proposed building and the Network Rail viaduct. Notwithstanding this Long term maintenance plans shall be agreed with network rail and shall not infringe	

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		on the minimum electrical clearance rules. The minimum gap is to allow for all construction works on site and any future maintenance to be carried out wholly within the applicant's own land ownership. Also for the following reasons:- • To ensure that the applicant does not construct their proposal so that any foundations that impacts on Network Rail structures. Under Building Regulations the depth and width of foundations will be dependent upon the size of the structure, therefore foundations may impact upon Network Rail land by undermining or de-stabilising soil or boundary treatments. • To ensure that the proposal will not be impacted by overhead electrified lines. Induced voltage can affect structures or individuals up to 20m from the overhead line. AC 25kv lines have overhead cables. • Given the fatal nature of contact with 25kv live overhead line equipment there is a 3 metre prohibited zone to the electrification equipment. Construction and Maintenance activities as required for the proposed building will only be permitted outside this zone. • To provide maintenance access to the viaduct structure • There are no Party Wall issues for which the applicant would be liable for all costs. • Due to potential effects of increased windage and gusting caused by the erection of such a tall building shall be calculated against all elements of Network	

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		Rail infrastructure i.e. OLE gantries, parapets/refuges and ancillary structures. 2. Soakaways as a means of storm/surface water disposal must not be constructed near/within 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Water discharged into the soil from the applicant's drainage system and land could seep onto Network Rail land and cause flooding, water and soil run off onto lineside safety critical equipment or de-stabilisation of land through water saturation. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Once water enters a pipe it becomes a controlled source and as such no water should be discharged in the direction of the railway. 3. Details of Vibro-compaction machinery / piling machinery or piling and ground treatment works to be undertaken as part of the development to be submitted to the Network Rail Asset Protection Engineer. Network Rail will need to review such works in order to determine the type of soil (e.g. sand, rock) that the works are being carried out upon and also to determine the level of vibration that will occur as a	

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		result of the piling. For piling operations please reference attached Network Rail Standard NR/L3/CIV/0063 for Piling, Drilling, Crane, MEWP and SMPT Operations Adjacent to the Railway. The design of the piling platform shall be subject to an independent CAT3 check by another practice for the calculations/detailed design check certificate where the collapse radius of the piling rig is over the railway. Vibration can present a risk to operation through disruption of equipment or through movement of ground or structures (ground displacement, settlement or heave). Excessive vibration near railway structures is unlikely to be acceptable, normally ruling out driven piling as well as vibro-compaction and stone columns. If these methods are used and the developer cannot demonstrate that the vibration does not exceed a peak particle velocity of 5mm/s at any structure then a settlement and vibration monitoring regime will be required. I have also attached Asset Protection Guidance Document, which references piling operations including the requirement for piling to be undertaken in a possession where there is a risk to railway operations 4. Foundation type and installation method to be agreed with NR. Any adverse effects on the existing foundations of the adjacent viaduct shall not be accepted. An appropriate monitoring regime is to be adopted throughout all execution stages. All excavations / earthworks carried out in the vicinity of	

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		Network Rail property/ structures must be designed and executed such that no interference with the integrity of that viaduct structure can occur. If temporary works compounds are to be located adjacent to the operational railway, these should be included in a method statement for approval by Network Rail. Prior to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for the approval of the Asset Protection Engineer and the works shall only be carried out in accordance with the approved details. 5. Prior to commencement Network Rail will need to be in receipt of a signed Basic Asset Protection Agreement (BAPA) in place. This is to cover costs of reviews of Risk Assessment and Method Statement (RAMS) and any associated on-site supervision by Network Rail. RAMS to be accepted by Network Rail prior to commencement of works on site. Construction phase clearances and working practices are to be agreed with Network Rail. 6. Network Rail requests that the LPA and the developer (along with their chosen acoustic contractor) engage in discussions to determine the most appropriate measures to mitigate noise and vibration from the existing railway to ensure that there will be no future issues for residents once they take up occupation of the dwellings. Network Rail is aware that residents of dwellings adjacent to the	

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		railway have in the past discovered issues upon occupation of dwellings with noise and vibration from the existing operational railway, as a consequence of inadequate mitigation measures for the site, and therefore it is a matter for the developer and the LPA via mitigation measures and conditions to ensure that these issues are mitigated appropriately prior to construction. • The current level of railway usage may be subject to change at any time without prior notification including increased frequency of trains, night time train running and heavy freight trains. • Network Rail also often carry out works at night on the operational railway when normal rail traffic is suspended and often these works can be noisy and cause vibration. • Network Rail may need to conduct emergency works on the railway line and equipment and these would not be notified to residents in advance due to their safety critical nature. • The proposal should not prevent Network Rail from its statutory undertaking 7. Demolition works on site must be carried out so that they do not endanger the safe operation of the railway, or the stability of the adjoining Network Rail structures and land. Demolition of any existing buildings, due to its close proximity to the Network Rail boundary, must be carried out in accordance with an agreed method statement. Review of the method	

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		statement will be undertaken by the Network Rail Asset Protection Engineer before the development and any demolition works on site can commence. Network Rail would like to add that the applicant is strongly recommended to employ companies to demolish buildings / structures belonging to the National Federation of Demolition Contractors. This will ensure that all demolition works are carried out to professional standards and the company itself will also include liability insurance as part of its service and that demolition works on site do not impact the safety and performance of the railway. Demolition works to control risk of dust and debris on Network Rail land (and asbestos if applicable). 8. There is the potential for solar reflections from the building elevation to affect train drivers' visibility on the busy rail corridor. Geometric glint and glare assessment to be produced to consider reflections towards railway signals, and train drivers' visibility in the vicinity of the proposed development. The report will consider the receptors (railway signals/signs and train drivers) and the sun as it passes across the sky through the year. 9. The requirements of CPA Tower Crane guidance will apply due to the railway being within the collapse radius of the tower crane. As part of the process a Network Rail Project Engineer will review the temporary works certificate and associated calculations. Please refer to CPA requirements	

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		attached including section 2.3.2, which outlines the requirement to downrate cranes alongside Network Rail infrastructure. If there is a requirement for a tower crane to oversail Network Rail land discussions will be required to assess the feasibility of an oversailing agreement. 10. There shall be no opening windows, terraces or balconies facing the railway, or at a position such that missiles/objects can be thrown onto the railway. 11. Network Rail requirements for landscaping are highlighted below. Network Rail would request that no trees are planted immediately adjacent to the boundary with our land and the operational railway, also see attached information guidance note on suitable trees adjacent to the boundary. • Trees can be blown over in high winds resulting in damage to Network Rail's boundary treatments / fencing as well as any lineside equipment (e.g. telecoms cabinets, signals) which has both safety and performance issues. • Trees toppling over can also destabilise soil on Network Rail land and the applicant's land which could result in landslides or slippage of soil onto the operational railway. • Deciduous trees shed their leaves which fall onto the rail track, any passing train therefore loses its grip on the rails due to leaf fall adhering to the rails, and there are issues with trains being unable to break correctly for signals set at danger.	

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		Network Rail would request that only evergreen shrubs are planted and we would request that they should be planted a minimum distance from the Network Rail boundary that is equal to their expected mature growth height. Lists of trees that are permitted and those that are not are provided below and these should be added to any tree planting conditions: Permitted: Birch (Betula), Crab Apple (Malus Sylvestris), Field Maple (Acer Campestre), Bird Cherry (Prunus Padus), Wild Pear (Pyrs Communis), Fir Trees - Pines (Pinus), Hawthorne (Cretaegus), Mountain Ash - Whitebeams (Sorbus), False Acacia (Robinia), Willow Shrubs(Shrubby Salix), Thuja Plicatat "Zebrina" Not Permitted: Alder (Alnus Glutinosa), Aspen - Popular (Populus), Beech (Fagus Sylvatica), Wild Cherry (Prunus Avium), Hornbeam (CarpinusBetulus), Small-leaved Lime (Tilia Cordata), Oak (Quercus), Willows (Salix Willow), Sycamore - Norway Maple (Acer), Horse Chestnut (Aesculus Hippocastanum), Sweet Chestnut (Castanea Sativa), London Plane (Platanus Hispanica). Network Rail is required to recover all costs associated with facilitating these works. A Basic Asset Protection Agreement will be required to facilitate works on site. Email: AssetProtectionLNWNorth@networkrail.co.uk Example 3 - Adjacent to Third Rail Tunnel	

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		Further to previous Network Rail comments on the planning application, I understand that the development involving three towers at Lanyork Road is now progressing. It would be appreciated if you can forward details for the client representative as there are aspects that require further discussion with respect to the railway interface. For information see attached guidance for development above/adjacent to railway tunnels next to the railway. 1. It is anticipated that due to the nature of the interface it will be necessary for the Engineers appointed to enter into assurance process with Network Rail to demonstrate that the foundations for the development will not impact on the adjacent railway tunnel, the process is further outlined below. The formal Railway Engineering Assurance process is described in NR/L2/CIV/003 Design, Construction and Maintenance of Civil Engineering Infrastructure. Components are as follows: Approval in Principle outlining the applicable design standards and other requirements (otherwise known as Form A) Detailed Design Certificate (Form B) The assurance process also requires appointment of Contractors Engineering Manager (CEM) and Contractors Responsible Engineer (CRE), however for a single discipline design the CEM and CRE can be the same person. See Network rail standard	

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		NR/L2/RSE/02009 Engineering Management for Projects. The CEM has a duty to ensure the competency of their designers and design team and remain accountable for the actions of such and their specialist design CREs. 2. For information see attached publication for tower cranes titled "CPA Requirements for Tower Cranes Alongside Railways Controlled by Network Rail". Summary as below in accordance with CPA a) The crane should de-rated to 75% of maximum capacity in accordance with CPA guidance b) The base design loads should be uprated by 1.33 as per 2.3.3 in accordance with CPA guidance and crane down rated as 2.3.2. c) An independent CAT3 check of the calculations/detailed design check certificate will be required by another practice along with engineers CV. 3. The contractor should reference attached Network Rail standard NR/L3/CIV/0063 Piling, Drilling, Crane, MEWP and SMPT Operations Adjacent to the Railway. The design of the piling platform shall be subject to an independent CAT3 check by another practice for the calculations/detailed design check certificate. 4. Details of Vibro-compaction machinery / piling machinery or piling and ground treatment works to be undertaken as part of the development to be submitted to the Network Rail Asset Protection Engineer. Network Rail will need to review such works in order to determine the type of soil (e.g. sand, rock)	

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		that the works are being carried out upon and also to determine the level of vibration that will occur as a result of the piling. The impact upon the railway is dependent upon the distance from the railway boundary of the piling equipment, the type of soil the development is being constructed upon and the level of vibration. Each proposal is therefore different and thence the need for Network Rail to review the piling details / method statement. Maximum allowable levels of vibration - CFA piling is preferred as this tends to give rise to less vibration. Excessive vibration caused by piling can damage railway structures and cause movement to the railway track as a result of the consolidation of track ballast. The developer must demonstrate that the vibration does not exceed a peak particle velocity of 5mm/s at any structure or with respect to sensitive railway infrastructure. 5. Foundation type and installation method to be agreed with NR. Any adverse effects on the existing Merseyrail tunnel shall not be accepted. An appropriate monitoring regime is to be adopted throughout all execution stages. All excavations / earthworks carried out in the vicinity of Network Rail property/ structures must be designed and executed such that no interference with the integrity of that railway structures can occur. If temporary works compounds are to be located adjacent to the operational railway, these should be included in a method statement for approval by Network Rail. Prior	

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		to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for the approval of the Asset Protection Engineer and the works shall only be carried out in accordance with the approved details. 6. Network Rail Review and acceptance of Method Statements/Risk Assessments will also be required for the following:- a) Tower Cranes b) Piling rigs c) Mast climbing installations d) Mobile crane operations e) Crawler cranes 7. Prior to commencement Network Rail will need to be in receipt of a signed Basic Asset Protection Agreement (BAPA) in place. This is to cover costs of engineering reviews including reviews of Risk Assessment/Method Statement (RAMS) and any associated on-site supervision by Network Rail. RAMS to be accepted by Network Rail prior to commencement of works on site. Construction phase clearances and working practices are to be agreed with Network Rail. Example 4 - Adjacent to non-electrified Railway Viaduct We would propose a minimum 4m clearance to the viaduct due to your maintenance requirements for	

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		this section of viaduct. The maintenance strip also provides a maintenance strip to facilitate maintenance to proposed adjacent buildings. Tall buildings adjacent to the railway should have a maintenance cradle to mitigate risk of scaffolding for building maintenance purposes with respect to the railway. A 4m minimum clearance to tall buildings above height of viaduct parapet would also be advisable in case of future electrification of the route. Please note that 3m minimum clearance is required to 25kV railway electrification with respect to construction works including maintenance cradle, 4m clearance to the building would mean that the elevation to the railway would still be readily maintainable. A 4 metre wide maintenance strip to a railway viaduct should be provided to ensure the safe operation of the railway and the rail infrastructure, as well as permitting unrestricted access for maintenance purposes. Network Rail also needs to be able to carry out all necessary maintenance and renewal works without interference or obstruction, including urgent and emergency maintenance which may need to be carried out at short notice. Maintenance activity is likely to be in connection with possession periods, typically involving short-term concentrated round-the-clock weekend working with hand-back of the railway to the train operating companies as soon as possible. Outside a major failure of the network, what would be expected is sporadic maintenance of the following	

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		nature: • Sides of the viaduct; de-vegetation and if necessary pointing. • Detailed and visual inspections of the viaduct usually comprise a scissor jacked platform (3 to 4 metres long) on 4 wheels and in such circumstances it would be unusual for scaffolding to be used; • Barrels and/or soffits of the arches for de-vegetation and if necessary pointing. Please also note the following requirements 1. There shall be no opening windows, terraces or balconies facing the railway, or at a position such that missiles/objects can be thrown onto the railway. 2. Details of Vibro-compaction machinery / piling machinery or piling and ground treatment works to be undertaken as part of the development to be submitted to the Network Rail Asset Protection Engineer. Network Rail will need to review such works in order to determine the type of soil (e.g. sand, rock) that the works are being carried out upon and also to determine the level of vibration that will occur as a result of the piling. The impact upon the railway is dependent upon the distance from the railway boundary of the piling equipment, the type of soil the development is being constructed upon and the level of vibration. Each proposal is therefore different and thence the need for Network Rail to review the piling	

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		details / method statement. Maximum allowable levels of vibration - CFA piling is preferred as this tends to give rise to less vibration. Excessive vibration caused by piling can damage railway structures and cause movement to the railway track as a result of the consolidation of track ballast. The developer must demonstrate that the vibration does not exceed a peak particle velocity of 5mm/s at any structure or with respect to the rail track. 3. Foundation type and installation method to be agreed with NR. Any adverse effects on the existing foundations of the adjacent viaduct shall not be accepted. An appropriate monitoring regime is to be adopted throughout all execution stages. All excavations / earthworks carried out in the vicinity of Network Rail property/structures must be designed and executed such that no interference with the integrity of that viaduct structure can occur. If temporary works compounds are to be located adjacent to the operational railway, these should be included in a method statement for approval by Network Rail. Prior to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for the approval of the Asset Protection Engineer and the works shall only be carried out in accordance with the approved details. 4. The minimum gap to the railway viaduct is to allow for all construction works on site and any future	

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		maintenance to be carried out wholly within the applicant's own land ownership. Also for the following reasons:- • To ensure that the applicant does not construct their proposal so that any foundations that impacts on Network Rail structures. Under Building Regulations the depth and width of foundations will be dependent upon the size of the structure, therefore foundations may impact upon Network Rail land by undermining or de-stabilising soil or boundary treatments. • To provide maintenance access to the viaduct structure • There are no Party Wall issues for which the applicant would be liable for all costs.	
NHS Property Services		Detailed Comments on Emerging Local Plan At this early stage of the consultation process, our comments are focused on highlighting NHSPS priority areas important to embedding the needs of the health services into the Local Plan in a way that supports sustainable growth. Affordable Homes for NHS Staff In undertaking further work on local housing needs, we suggest the Council consider the need for affordable housing for NHS staff and those employed	Comments noted. The Council notes the importance of ensuring sufficient availability of affordable housing within the Borough. All market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has

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		by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff. Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council: • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for	demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. The Council will ensure that the availability of affordable housing provides a range of tenures as well as a variety of size and type.

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		NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). Conclusion NHSPS thank Fylde Council for the opportunity to comment on the draft Fylde Local Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.	
Pegasus Group for Rowland Homes		7.1. Pegasus Group has been instructed on behalf of their client, Rowland Homes, to prepare representations to the Fylde Local Plan Options, Issues, Vision and Scope Consultation (Regulation 18) for the Fylde Local Plan to 2042. 7.2. Rowland Homes have a legal interest in land at Moss Side Lane, Wrea Green, which is immediately adjacent to the settlement boundary. 7.3. The Council need to prepare a new Local Plan, given the changes to national planning policy. The updated National Planning Policy Framework (December 2024), together with updated Planning Practice Guidance, fundamentally altered the way in which the calculation of housing need is undertaken.	The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs

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		7.4. Using the most recent affordability data (from March 2025) and the most up to date housing stock information (from May 2025), the LHN figure for Fylde is now 419 dwellings per annum (rather than the 410 dwellings per annum stated in the consultation document). This means over the stated plan period, the new Local Plan should be planning for a minimum of 7,542 dwellings, not the 7,380 homes identified in paragraph 4.2. 7.5. Any future development strategy should not place so much reliance on a small number of strategic locations, or a single strategic location, as is potentially proposed as part of one option. With this in mind, and in order to comply with NPPF paragraphs 72 and 73, the Development Strategy should support the delivery of sufficient homes to meet the local housing needs, across a range of housing types and in a variety of locations. This should include land for larger strategic allocations as well as smaller land parcels for small and medium sized house builders. 7.6. Rowland Homes have also made other suggestions on Protected Environments and Infrastructure which will be developed in due course as the Plan progresses.	in Fylde will need to be 6,656 homes. The Local Plan Development Strategy is to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Around 90% of homes to be developed in the plan period (including small sites) and 24.04 ha of employment land will be located in the four Strategic Locations for development. The four Strategic Locations are: • St Annes (including Squires Gate); • Whitehills and Whyndyke; • Warton; and • Kirkham and Wesham. Other development will mainly be located in the Non-strategic Locations for Development, which

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			comprise the Key Service Centre of Lytham, the Local Service Centres of Freckleton and Ansdell, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. Around 10% of homes to be developed in the plan period (including small sites) and 0.45 ha of employment land will be located in the Non-strategic Locations. Please refer to Strategic Policy DST1: The Development Strategy for further information. Strategic Policy HOU2: Density and Mix of Housing notes that a broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and

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			housing requirements of the Borough. Please refer to Policy for further information.
PWA Planning for Dixon Grange The Villa		6.1. Dixon Grange welcomes the opportunity to engage constructively in this Regulation 18 consultation and supports the Council's commitment to preparing a new Local Plan. However, for this new Plan to be found sound and to effectively meet the challenges of the next plan period, it must represent a fundamental departure from the restrictive and outdated policies of the past. A simple "update" will not suffice; a new, pro-growth, and policy-compliant approach is essential. 6.2. Throughout these representations, we have highlighted a consistent theme: the current Local Plan's policy framework, particularly concerning land outside of defined settlement boundaries, is no longer fit for purpose. Policies for Areas of Separation (AoS) and the Open Countryside are overly restrictive, inconsistent with the more nuanced approach of the National Planning Policy Framework (NPPF), and act as a significant barrier to the delivery of sustainable development. 6.3. This is not merely a theoretical issue. The land at The Villa, Wrea Green, is a tangible example of a high-quality, sustainable, and site that is being unfairly constrained by these flawed local	Strategic Policy DST4: Areas of Separation has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy (see below) in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and

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		policies. The site is a logical extension to a highly sustainable Tier 1 settlement, offers the opportunity to deliver a significant environmental enhancement by developing suitable development opportunities. It is precisely the kind of sustainable site the NPPF seeks to encourage. 6.4. Therefore, our primary recommendation is one of policy reform, alongside a review of existing settlement boundaries. 6.5. By making these necessary policy changes, the Council will create a sound planning framework that can respond positively to sustainable opportunities. A direct and logical outcome of adopting this sound, evidence-led, and NPPF-compliant approach would be the recognition of the significant merits of sites such as The Villa. 6.6. We therefore strongly urge Fylde Borough Council to embrace this opportunity for positive change and changing the settlement boundary of The Villa given the as-build nature of the land, and/or allocating the site separately to support its leisure/tourism benefits.	distinctiveness of the settlements. The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. The Policy shows the restrictions for what development will be limited to. Please

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
			refer to Policy for further information. Strategic Policy DST5: The Countryside gives a lower standard of protection than Green Belt or Area of Separation policies. The principle is to seek to allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. The Policy shows the circumstances which development in the Countryside will be permitted to. Please refer to Policy for further information. Each site that was submitted during the Call for Sites has been assessed and analysed as part of the SHELAA to

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
			identify sufficient sites to meet needs that are suitable, available and achievable.
PWA Planning for Medicom	CONCLUSION 11.1. This representation is fundamentally about the need for Fylde Council to adopt a sound, positive, and legally compliant Local Plan. The current Issues and Options consultation reveals a strategic approach that is inconsistent with the NPPF and will fail to meet the borough's objectively assessed development needs. 11.2. Throughout this statement, we have demonstrated that the Council's refusal to review the Green Belt is an unsound position. It ignores the "exceptional circumstances" created by a significant increase in housing need and fails to follow the clear, evidence-led process for identifying less sensitive "Grey Belt" land, as now expected by the NPPF and its supporting Planning Practice Guidance. A plan that does not examine all reasonable options for development, including a Green Belt review, cannot be found positively prepared or justified. 11.3. The land at School Farm, Warton, is a tangible example of the sustainable development opportunities that a sound policy framework can and should unlock. It is not merely a constrained site, but a solution. As a previously developed "Grey Belt" site in a highly sustainable location—immediately adjacent to the		The Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. National policy notes that the general extent of Green Belts is established. It states that, once established,

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	borough's largest employer—it represents a priority for release under a correctly applied, NPPF-compliant strategy. Its allocation would make effective use of land, reduce the need to travel, and support the local economy. 11.4. The allocation of School Farm is, therefore, not simply a site-specific request, but the logical outcome of a sound, evidence-led, and NPPF-compliant plan-making process. For this to be realised, the new Local Plan must move beyond the restrictive policies of the past. 11.5. We therefore strongly urge Fylde Borough Council to embrace the positive and plan-led approach set out in national policy. This must begin with the commitment to undertake the necessary and justified Green Belt review. As a direct and logical consequence of this sound process, the Council should then allocate the land at School Farm, Bank Lane, Warton, for residential development in the emerging Local Plan.		Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances can include, but are not limited to, circumstances where an authority cannot meet its development needs through other means, having fully examined all other reasonable options. In Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land. Other areas are identified in the current Local Plan as either Areas of Separation, or Countryside. The SHELAA identifies

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			sufficient sites to meet needs that are suitable, available and achievable within land that is not designated as Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land currently designated as Green Belt is not required. Please refer to Strategic Policy DST3: Green Belt for further information.
PWA Planning for Pringle Homes		11.1. Pringle Homes welcomes the opportunity to engage constructively in this Regulation 18 consultation and supports the Council's commitment to preparing a new Local Plan. However, for this new Plan to be found sound and to effectively meet the challenges of the next plan period, it must represent a fundamental departure from the restrictive and outdated policies of the past. A simple "update" will	Strategic Policy DST4: Areas of Separation has been reviewed for the new Local Plan. The boundary of the Area of Separation between Kirkham and Newton has been drawn to

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
		not suffice; a new, pro-growth, and policy-compliant approach is essential. 11.2. Throughout these representations, we have highlighted a consistent theme: the current Local Plan's policy framework, particularly concerning land outside of defined settlement boundaries, is no longer fit for purpose. Policies for Areas of Separation (AoS) and the Open Countryside are overly restrictive, inconsistent with the more nuanced approach of the National Planning Policy Framework (NPPF), and act as a significant barrier to the delivery of sustainable development. 11.3. This is not merely a theoretical issue. The land at Greenlands Farm, Wrea Green, is a tangible example of a high-quality, sustainable, and deliverable housing site that is being unfairly constrained by these flawed local policies. The site is a logical extension to a highly sustainable Tier 1 settlement, offers the opportunity to deliver a significant environmental enhancement by redeveloping a derelict brownfield portion, and is being promoted by a developer with an impeccable track record of delivery. It is precisely the kind of sustainable development the NPPF seeks to encourage. 11.4. The current AoS policy, however, is a blunt instrument that is now demonstrably more restrictive than national Green Belt policy. It prevents a balanced assessment and fails to recognise that a sensitively designed scheme can respect the strategic function of	follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy (see below) in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly,

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		the designation while delivering much-needed homes. For the new Local Plan to be sound, it cannot carry forward this flawed approach. 11.5. Therefore, our primary recommendation is one of policy reform. The Council must embrace the flexibility and pro-sustainability ethos of the NPPF by: 1. Fundamentally reviewing the Area of Separation policy to allow for the release of less sensitive parcels of land, such as those containing previously developed or derelict buildings, which do not compromise the core purpose of the designation. 2. Abolishing the restrictive 'Open Countryside' designation and replacing it with a positive, criteria-based policy that judges sites on their individual sustainability credentials. 11.6. By making these necessary policy changes, the Council will create a sound planning framework that can respond positively to sustainable opportunities. A direct and logical outcome of adopting this sound, evidence-led, and NPPF-compliant approach would be the recognition of the significant merits of the Greenlands Farm site. 11.7. We therefore strongly urge Fylde Borough Council to embrace this opportunity for positive change and allocate the land at Greenlands Farm, Ribby Road, Wrea Green, for residential development in the emerging Local Plan	opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. The Policy shows the restrictions for what development will be limited to. Please refer to Policy for further information. Strategic Policy DST5: The Countryside gives a lower standard of protection than Green Belt or Area of Separation policies. The principle is to seek to allow uses appropriate to the countryside to

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			operate without unnecessary restriction, but prevent encroachment by urbanising development. The Policy shows the circumstances which development in the Countryside will be permitted to. Please refer to Policy for further information. Each site that was submitted during the Call for Sites has been assessed and analysed as part of the SHELAA to identify sufficient sites to meet needs that are suitable, available and achievable.
PWA Planning for Ribby Hall		5.1. Ribby Hall Village welcomes the opportunity to engage constructively in this Regulation 18 consultation and supports the Council's commitment to preparing a new Local Plan. 5.2. Throughout these representations, we have highlighted a consistent theme: the current Local	Strategic Policy DST4: Areas of Separation has been reviewed for the new Local Plan. The boundary of the Area of Separation between

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		Plan's policy framework, particularly concerning land outside of defined settlement boundaries, is no longer fit for purpose. Policies for Areas of Separation (AoS) and the Open Countryside are overly restrictive, inconsistent with the more nuanced approach of the National Planning Policy Framework (NPPF), and act as a significant barrier to the delivery of sustainable development. 5.3. The current AoS policy is a blunt instrument that is now demonstrably more restrictive than national Green Belt policy. It prevents a balanced assessment and fails to recognise that a sensitively designed scheme can respect the strategic function of the designation while delivering much-needed homes. For the new Local Plan to be sound, it cannot carry forward this flawed approach. Furthermore, as illustrated within these representations, it is critical that a Green Belt review is undertaken. 5.4. Therefore, our primary recommendation is one of policy reform. We therefore strongly urge Fylde Borough Council to embrace this opportunity for positive change and allocate the additional land illustrated on the plan contained in Appendix A as part of the Ribby Hall Village Allocation (policy EC6).	Kirkham and Newton has been drawn to follow Parrox Lane, Newton, to provide a more defensible and appropriate permanent boundary. The policy seeks to restrict development to a greater degree than the countryside policy (see below) in order to avoid harm to the effectiveness of the gap between the settlements and protect the identity and distinctiveness of the settlements. The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate

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			recreational uses will be supported. Similarly, opportunities to conserve, restore, enhance and create biodiversity and geodiversity value will be encouraged. Areas of Separation shown on the Policies Map are designated between: • Kirkham and Newton; and • Wrea Green and Kirkham. The Policy shows the restrictions for what development will be limited to. Please refer to Policy for further information. Strategic Policy DST5: The Countryside gives a lower standard of protection than Green Belt or Area of Separation policies. The principle is to seek to

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			allow uses appropriate to the countryside to operate without unnecessary restriction, but prevent encroachment by urbanising development. The Policy shows the circumstances which development in the Countryside will be permitted to. Please refer to Policy for further information. Each site that was submitted during the Call for Sites has been assessed and analysed as part of the SHELAA to identify sufficient sites to meet needs that are suitable, available and achievable. The Draft Revised Framework proposes that any Local Planning Authority with any Green Belt should

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			conduct a review of it, even in such circumstances as exist in Fylde. However it is unclear whether the existence of authorities in the position of Fylde was recognised or identified in the drafting of this element of the Draft Revised Framework, and the Council has made representations to the consultation to this effect. In the event that the policy is formally brought forward as currently drafted, the Council will be required to conduct a review of Green Belt. However, notwithstanding any review, sufficient land is allocated within the policies of the plan to meet development needs, and therefore the allocation of land

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			currently designated as Green Belt is not required. Please refer to Strategic Policy DST3: Green Belt for further information.
PWA Planning	1.4. While we support the Council's decision to prepare a new plan, our overarching submission is that a simple "update" of the current strategy will be insufficient to meet the challenges and opportunities ahead. The significant increase in the borough's objectively assessed housing need, coupled with fundamental shifts in national policy, demands a bold, comprehensive, and proactive new plan that is prepared to review all strategic options to meet its development needs in full. We trust our detailed comments will assist the Council in preparing a positive and sound plan for the borough's future.	11.1. This Issues and Options consultation document is a crucial first step, but we are concerned that its tone and framing do not adequately convey the scale of the challenge or the necessity for bold decision-making. 11.2. The Council needs to be much clearer with the public that tough decisions are unavoidable if Fylde is to meet its government-mandated housing need. It must proactively articulate not only the legal requirement to plan for this growth but also the significant benefits that well-planned development brings: new affordable homes for local families, investment in schools and healthcare, support for local businesses, and enhanced community facilities. 11.3. Equally, the Council must clearly explain the pitfalls of failure. A failure to adopt a sound, deliverable plan will lead to a loss of local control, with planning decisions being made by appeal inspectors under the NPPF's "presumption in favour of sustainable development".	Comments noted. The Council can reassure that whilst the emerging Local Plan is built upon the existing Plan, the Council has reviewed Policies to ensure the Plan encourages sustainable growth and development within the Borough. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year.

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		11.4. The current consultation feels far too soft, implying that a mere "tinkering around the edges" of the current Local Plan will suffice. The evidence shows this is not the case. The authority needs to get real and make the tough decisions required to maximise sustainable development and achieve the ambitious goals placed upon it. We urge Fylde Council to be more proactive and to use this new Local Plan to make a genuine difference to the future prosperity of the borough.	Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs in Fylde will need to be 6,656 homes. The emerging Local Plan will include an Appendix that demonstrates the schedule of superseded policies and details of how policies from the existing Local Plan have been adapted. The existing Local Plan has a requirement for 305 new homes per year. The Council has identified the up-to-date Local Housing Need figure under government policy as 416 net additional homes per year. Accordingly, the minimum requirement for the plan period 2026 to 2042 to meet needs

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			in Fylde will need to be 6,656 homes. The Council notes that access to accommodation is fundamental to quality of life. Homes need to be available in sufficient quantity and of high quality design. There should be a variety of house types, particularly in terms of tenure and price, suitable for a mix of households such as families with children, single persons and older people. Meeting needs for homes is a key aspect of creating and maintaining sustainable communities. Strategic Policy HOU2: Density and Mix of Housing states that a broad mix of types and sizes of home, suitable for a broad range of age groups, will be required

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			on all sites to reflect the demographics and housing requirements of the Borough. Please refer to Policy for further information. Strategic Policy HOU3: Affordable Housing states that all market housing schemes of 10 or more homes will be required to provide 30% affordable housing, unless robust viability testing has demonstrated that the cost of the affordable housing provision would prevent the development from being delivered. Please refer to Policy for further information. The Plan will also include wider Housing Policies that support delivery of housing developments to ensure the housing needs of all

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			residents of the Borough are met. A vital element of sustainable development is the provision and delivery of local services and infrastructure. However, lack of infrastructure should not be seen as an obstacle to development. Planning should proactively drive and support sustainable economic development, and this includes the delivery of infrastructure. Additionally, the Framework requires that planning policies should seek to address potential barriers to investment, including any lack of infrastructure. The Council has prepared an Infrastructure Delivery

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			Plan (IDP), which identifies infrastructure required by the Borough will be secured to support the development in the Local Plan and how it will be delivered. In doing this, it identifies issues of shortfall in existing infrastructure that present obstacles to the delivery of the Local Plan and how these will be overcome. The IDP also identifies gaps in funding which will need to be met through developer contributions. Strategic Policy IFR1: Service Accessibility and Infrastructure states that development will be required to provide essential site service and communications infrastructure and demonstrate that it will

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			support infrastructure requirements of the policies of the Local Plan and national policy. The Policy highlights requirements that developments should achieve to protect and create sustainable communities. Please refer to Policy for further information. Strategic Policy DST1: The Development Strategy highlights the need to direct future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. Please refer to Policy for further information.
Sport England	Given the importance attached in paragraph 3.2 of the consultation document to prioritising locations for development to promote healthy lifestyles and the importance attached to planning policies enabling and supporting healthy lives in paragraph 96 of the NPPF, it is		Comments noted. The Council acknowledges the importance of promoting healthy lifestyles and will be

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	surprising that the consultation does not have a specific focus on how the Local Plan can promote health and wellbeing. It is acknowledged that there are related policy themes that are currently included in the consultation document that will contribute towards supporting health and wellbeing e.g. active travel, climate change, green infrastructure etc. However, the new Local Plan should review the policies in chapter 10 of the adopted Local Plan which have a focus on this theme to ensure that they remain up-to-date and cover matters such as how design can encourage active lifestyles as well as conventional health and wellbeing policy areas. Lancashire County Council as the public health authority should also be able to provide further advice on this matter.		incorporated into Policies. The Development Strategy will seek to achieve a sustainable pattern of development, the Council has prioritised locations where access can be provided for all to local facilities and to local jobs, by walking and cycling (active travel) to promote healthy lifestyles and by public transport. Please refer to Strategic Policy DST1: The Development Strategy for further information. Active travel – travel by walking, cycling and wheeling - is recognised as having significant health benefits for people. Large parts of the developed areas of Fylde are highly suitable for active travel. Most of

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			the urban areas are within close reach of town centres, the district centre or local centres as well as other essential facilities such as primary schools, so are ideally suited towards walking. St. Annes, Lytham, Ansdell, Wesham, Warton and Freckleton are generally flat so are well suited towards cycling. Despite this, the Borough has relatively low rates of active travel. It is therefore essential that the opportunities presented by new development, to create improved, connected and safe routes to encourage active travel from new developments and from existing developed areas, are taken.

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			In order to secure the long term viability of the Borough and to allow for the increased movement of people and goods expected, the Council will work with neighbouring authorities and transport providers to improve accessibility across the Borough, improve safety and quality of life for residents and reduce the Borough's carbon footprint. Developments will be required to improve community health and wellbeing by providing and encouraging take-up of alternative means of transport such as walking and cycling. Please refer to Strategic Policy IFR5: Enhancing Sustainable Transport Choice for further

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			information and details regarding requirements from developers. Strategic Policy DSA1: Achieving Good Design in Development will create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion, and there are clear and legible broad, well-lit pedestrian and cycle routes and high quality public space, which encourages the active and continual use of public areas and which promote health and wellbeing. Please refer to Policy for further information.
United Utilities	Water Efficiency In response to this question, we wish to request that the local plan includes the tighter optional standard for water	Thank you for your consultation seeking the views of United Utilities Water Limited (Uuw) as part of the Local Plan process. Uuw wishes to build a strong	Comments noted. The Local Plan will include several Climate Change,

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	efficiency in the construction of new dwellings as outlined in Housing: optional technical standards in the National Planning Practice Guidance. We have separate evidence to justify this approach which is reflective of the adoption of the tighter standard in recently adopted local plans in the North West namely, Lancaster, Blackburn and Wirral. We wish to specifically draw your attention to the following pieces of evidence: • U UW has published an updated Water Resource Management Plan 2024 (WRMP2024); and • updated evidence on the cost of implementing the tighter optional standard for water efficiency is published. See Table 3 of Water Ready A report to inform HM Government’s roadmap for water efficient new homes. United Utilities Final Water Resource Management Plan 2024 In accordance with guidance in the National Planning Practice Guidance, a water resource management plan is primary evidence that supports the implementation of the optional standard for water efficiency in the construction of new homes. U UW has recently published an updated Water Resource Management Plan 2024. Page 74 states: ‘Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, we are requesting that all local authorities in our supply area	partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps: - ensure a strong connection between development and infrastructure planning; - deliver sound planning strategies; and - inform our future infrastructure investment submissions for determination by our regulator. U UW wishes to highlight the benefit of early, constructive communication with the Council and site promoters to ensure a co-ordinated approach to the delivery of sustainable growth in sustainable locations. When preparing the local plan, new development should be focused in sustainable locations which are accessible to local services and infrastructure. We can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. Contact details available https://fyldegovuk.sharepoint.com/:b:/s/planningcommon/IQCqVpxVzIV0Ro_VnklpK5c0Aa7fKNmWbgiTkIOWfrjk3RI?e=fTiXKx To supplement this response, we have enclosed an appendix that provides updated supporting information and example policy wording for you to consider when preparing your new local plan. We would also welcome the opportunity to provide	Renewable Energy and Flood Risk Policies to ensure that future development is better equipped to deal with the impacts of climate as it will be in the future. All new development is required to minimise flood risk impacts on the environment, retain water quality and water efficiency, and mitigate against the likely effects of climate change on present and future generations. Strategic Policy CCH1: Flood Alleviation, Water Quality and Water Efficiency will outline how this will be achieved. Additionally, CCH1 seeks to improve water efficiency standards by minimising the use of portable mains water in new

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
	adopt the optional minimum building standard of 110 litres per person per day (lppd) in all new builds. We already incentivise water efficiency in new builds, by offering a 90% reduction in water charges to developers building water efficient homes which include measures to reduce water use to 100 lppd. This scheme was launched in 2018 and initially targeted a standard of 110 lppd, but due to the success of the scheme and to encourage further improvements in water efficiency, we reduced the threshold to 100 lppd in 2021. To date, more than 86,000 plots have been registered with many of these already built, creating savings of £25m for developers. A similar reduction on wastewater charges is available for properties featuring sustainable drainage, and both schemes are still available to developers building homes in the North West.’ The National Planning Practice Guidance is clear that there are a range of pieces of evidence that can be submitted to justify the implementation of the optional standard for water efficiency. It specifically references river basin management plans and water resource management plans as primary sources of evidence (see paragraph: 016 Reference ID: 56-016-20150327). These primary sources of evidence were specifically addressed in our statements to the examination of Places for Everyone. We wish to expand on the detail of these primary sources of evidence, in particular, the Water Resource Management Plan 2024 (WRMP24) for	our comments on any sites that are suggested to you as potential development sites when available. We are keen to undertake an initial assessment so that this can be fed into your site assessment process. Please ensure that you have regard to the main body of the letter and the associated supporting information, which includes recommended policies. Property Interests of UUW We would wish to assess any possible future development sites to determine whether we have any land interests such as easements and rights of access which are in addition to our statutory rights for inspection, maintenance and repair. These land interests may have restrictions that must be adhered to. It is the responsibility of the developer to obtain a copy of the associated legal document, available from our Legal Services department or Land Registry and to comply with the provisions stated within the document. We would request that these matters are addressed in site-specific policy / development considerations if you allocate the sites. We recommend that landowners/developers contact our Property Services team at PropertyGeneralEnquiries@uuplc.co.uk to discuss how any proposals may interact with our land interests. Our easements, pipe structures and access	development and incorporating measures to recycle and conserve water resources. Please refer to Policy for further information. Development must incorporate the most sustainable form of managing surface water, subject to the requirement for approval from the drainage authority. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems (SuDS), following the SuDS hierarchy. This would be greenfield run-off rate on greenfield sites.

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
	U UW. WRMPs must be prepared to comply with the latest regulatory guidance. Reflecting the challenges presented by climate change, a key change to the regulatory guidance since our previous WRMP is the requirement to demonstrate resilience to 1 in 500 year droughts by 2039. Previously the requirement was to be resilient to a 1 in 200 year drought. The Environment Agency's Water Resources Planning Guidelines state that WRMPs should consider the supply-demand balance at times when a company's supplies are low, and demand is high. The baseline scenario to be adopted for companies in England should be the Dry Year Annual Average scenario. The WRMPs of water companies are also expected to take account of government aspirations for leakage reductions and reductions in per capita consumption (PCC) in their final plans. These are set out in the National Framework for Water Resources (2020) in which the government sets out ambitious targets for the industry to reduce water consumption to 110 litres of water person per day and halve rates of leakage by 2050. This strategic choice is effectively, therefore, a regulatory expectation. WRMPs must also align with the relevant regional plan. For UW, this is the regional plan developed by the Water Resources West regional group. The Water Resources West Draft Regional Plan (Autumn 2022)¹ and associated evidence recommends the implementation of	rights should not be affected by the design and construction of new development.	Strategic Policy CCH2: Surface Water Run-Off and Sustainable Drainage will highlight the sequential attenuation measures that new development must incorporate. Please refer to Policy for further information. Fylde Council will continue to engage with United Utilities. A key objective of the Local Plan is to create safe, caring, sustainable communities by ensuring that accessible local facilities are available for new developments are maintained in existing areas. Strategic Policy IFR1: Service Accessibility and Infrastructure will ensure that development proposals

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
	the optional standard for water efficiency in the Water Resources West Region. UUW supplies water to four separate water resource zones. These include the Strategic Resource Zone (the SRZ), which serves in excess of seven million people and covers the vast majority of the North West. Fylde is part of the SRZ. UUW has now published a Final Water Resource Management Plan 2024 (WRMP24) for the period 2025-2050. This sets out the baseline supply-demand balance for water resources, i.e., the difference between the water demanded and the water that can be supplied within the SRZ. It shows that without the drought supply and demand measures included in our drought plan, there is a potential deficit in the SRZ, of 52.6 mega litres per day (Ml/d) in 2025/26 and without new interventions this rises to 314 Ml/d by 2049/50. This deficit is illustrated in the below table and figure, which are extracted from our WRMP24. The baseline supply-demand balance shown in Table 14 and Figure 22 of WRMP24 confirms that without any interventions, the SRZ faces a deficit such that available supplies are insufficient to meet demand plus target headroom from 2025 onwards. It is a deficit that covers the future development plan period for Fylde and increases over time. The supply-demand balance deficit is not a longer term problem. It is an immediate problem, which needs to be addressed through a range of interventions now. Without interventions, which include a reduction in		for local infrastructure works that will benefit the residents, businesses, visitors and/or environment of the Borough of Fylde will be supported. The Policy will outline how proposals for development should protect and create sustainable communities. The Policy will ensure that proposals demonstrate how access to services will be achieved by means other than the car, and where appropriate, demonstrate how the range of local social and community services and facilities available will be suitable and accessible for the intended occupiers or user(s) of the development.

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
	leakage and the construction of new dwellings to the tighter standard for water efficiency, the supply-demand balance deficit will worsen and the pressures on the environment will increase. Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, WRMP24 requests that all local authorities in our supply area adopt the optional minimum building standard of 110 litres of water used per person per day in all new build dwellings. As noted above, this is similarly stated in the Water Resources West Draft Regional Plan (Autumn 2022). Importantly, these interventions will increase resilience to climate change, reduce pressure to find new sources of water supply and reduce pressure on the environment. Changes to the flow and level of our water bodies are a water management issue and a key issue to consider in how we respond to the supply and demand deficit. In this context, it is relevant to note that the North West River Basin Management Plan identifies a high percentage of water bodies as not achieving good ecological status or potential. On the basis of the above, UUW considers there to be compelling evidence to justify the implementation of the tighter optional water efficiency standard now. Water Ready A report to inform HM Government's road map for water efficient new homes The optional standard is currently set at 110 litres per head per day (l/h/d).		

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
	Importantly Table 3 of this document confirms that the optional standard for water efficiency can be implemented at no extra cost. As such, there should be no concerns about the impact on viability as a result of implementing the optional standard for water efficiency. In the context of this evidence, it is critical that the new local plan implements a water efficiency policy to ensure that the proposed growth in Fylde is water efficient. UUW strongly believes that it would be illogical to allow the construction of a large amount of new dwellings every year in Fylde without applying the tighter standard for water efficiency as soon as possible. This is a critical component of the response to the climate emergency. Importantly, application of this approach has the added economic and societal benefit by reducing customer bills. Our recommended policy wording to implement the tighter standard for water efficiency is included in the appendix. Refer to https://fyldegovuk.sharepoint.com/:b:/s/planningcommon/IQCqVpxVzIV0Ro_VnklpK5c0Aa7fKNmWbgiTkIOWfrjk3RI?e=TnhXEQ for Table 14 and Figure 22		
Woodland Trust	The Woodland Trust notes that the new Local Plan currently does not include a specific policy on biodiversity. We strongly encourage the inclusion of a clear policy that not only protects existing habitats but also delivers measurable biodiversity gains through new development. In particular, we recommend setting a	Note: we consider all the policies to be legally compliant and sound unless otherwise stated in the response	Comments noted. Subject to viability, development will normally be expected to contribute towards the mitigation of its impact

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
	Biodiversity Net Gain (BNG) requirement higher than the statutory 10%, ideally 20%, to ensure that developments provide a genuine enhancement to local biodiversity rather than merely avoiding harm. Evidence shows that achieving higher BNG can often be done without substantial additional cost to developers, particularly when incorporated into site design from the outset.		on infrastructure, services and the environment and contribute towards the requirements of the community. Contributions will be secured through a planning obligation. Non-strategic Policy IFR2: Developer Contributions will list the types of infrastructure that developments may be required to provide contributions towards. For example, Enhancing the functionality, quality, connectivity and accessibility of the Green Infrastructure network – the network of natural environmental components and green and blue spaces (such as outdoor sports facilities, open space, including

Respondent name	(61) Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.	(62) Do you have any further comments on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042?	Council Response
			Fylde's Coastal Change Management Areas, stretching from Starr Hills to Savick Brook in the south and along the River Wyre in the north, Lancaster Canal, parks, allotments, play areas, enhancing and conserving biodiversity and management of environmentally sensitive areas). The Council is producing a separate Biodiversity Net Gain guidance for applicants that will work alongside the Local Plan.



**Get involved in creating Fylde's new Local Plan
to 2042 at our consultation events!**

Monday 6 October, 2-5pm

Thursday 9 October, 3:30-7:30pm

Friday 10 October, 3-7pm

Monday 13 October, 12-4pm

Tuesday 14 October, 3:30-7:30pm

Thursday 16 October, 3:30-7:30pm

Friday 17 October, 3-7pm

Wednesday 22 October, 2:30-6:30pm

Wesham Community Centre

Lytham Institute

Staining Village Hall

Warton Village Hall

Wrea Green Community Centre

Singleton Village Hall

Freckleton Village Memorial Hall

Fairhaven Lake Water Sports Centre

NEW DATE ADDED: Wednesday 15 October, 11:30-3:30pm @ West Lodge, Ashton Gardens



**Scan the QR code to view and comment on the Options,
Issues, Vision and Scope document, or visit
fylde.gov.uk/2042**





Our Ref: Reg 18 2025

Your Ref:

Please Ask For: Planning Policy

Telephone: 01253 229159

Email: planningpolicy@fylde.gov.uk

Date: 19 September 2025

Dear Sir/Madam

Public Consultation

The Town and Country Planning (Local Planning) (England) Regulations 2012: Regulation 18

Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042

The Council is consulting on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042 for six weeks to 5.00pm on Thursday 30th October 2025.

The Fylde local Plan to 2042 will be the new statutory Development Plan for the Borough of Fylde. It will allocate land to provide for development needs and set out policies for the development and use of land in the Borough. The Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042 document provides an opportunity for you to let us know what should be included in the new plan.

The consultation can be viewed at www.fylde.gov.uk/2042.

The consultation document is also available for inspection at Fylde Council, Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW and at libraries throughout the Borough. Please visit www.lancashire.gov.uk/libraries/ for library locations and opening times.

The easiest way to make comments is through the online form. This can be reached from the web page www.fylde.gov.uk/2042.

Alternatively comments may be made by email to planningpolicy@fylde.gov.uk, or by post to Planning Policy, Planning Department, Fylde Council, Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW, to be received by the deadline of 5pm on 30th October 2025.

All comments will be published, but apart from the name of the sender no other personal information will be publicly available. Name, email and/or address details as applicable will be retained by the Council, in order to inform respondents of later stages in the plan-making process and other Fylde Planning Policy consultations, but for no other purpose. Anonymous comments will not be accepted.

Fylde Council St Annes Road West Lytham St Annes FY8 1LW 01253 658658 listening@fylde.gov.uk

You are receiving this letter because your contact details are held on our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, or if you wish to be notified by email in future, please let us know either by phone 01253 229159 or email planningpolicy@fylde.gov.uk

Yours faithfully

Eddie Graves

Eddie Graves
Planning Policy Manager

Appendix 3: Email to Consultees



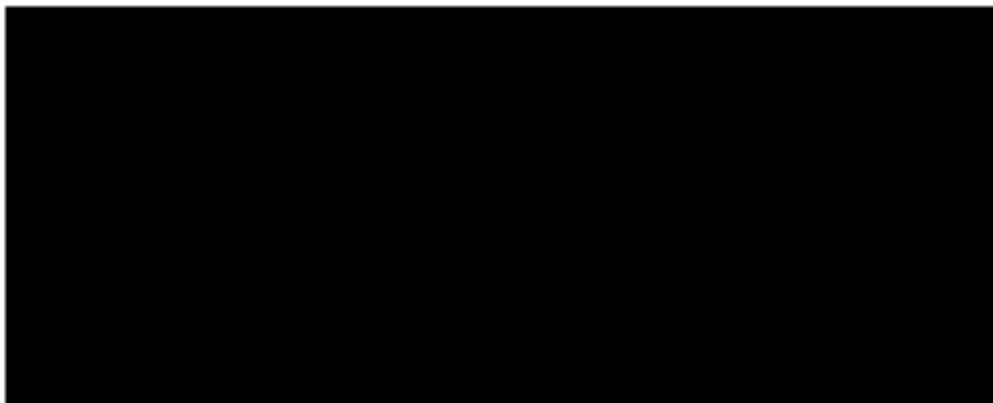
Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042: Regulation 18 Consultation

From

Date

To

Bcc



Dear

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You are receiving this email because your contact details are held on our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know by email to planningpolicy@fylde.gov.uk.

Kind regards

Planning Policy Team

Appendix 4: Split of Consultees Contacted

ROC DATABASE					
Document Name: Local Plan to 2042 Options, Issues, Vision and Scope 2025 Regulation 18 consultation. Split of letters and emails sent to consultees*					
			Total Letters	*Total Emails	Total
CODES		Description			
SCB	GD	Government Departments	8	n/a	8
SCB	LA	Local Authorities	5	n/a	5
SCB	LAPC	Adjacent Local Authority Parish Councils	1	n/a	1
SCB	PC	Parish Councils	0	n/a	0
SCB	SCB	Specific Consultation Bodies	6	n/a	6
GCB	BS	Business Support	7	n/a	7
GCB	DIS	Disabled	2	n/a	2
GCB	ERNG	Ethnic Racial & National Groups	0	n/a	0
GCB	FCO	Fylde Council Officers	0	n/a	0
GCB	LB	Local Businesses	43	n/a	43
GCB	RG	Religious Groups	22	n/a	22
GCB	VB	Voluntary Bodies	20	n/a	20
OC	ACT	Action Groups	0	n/a	0
OC	AGCN	Agents/Consultants	88	n/a	88
OC	AGCN Agent	Agent	10	n/a	10
OC	BC	Building Contractors	5	n/a	5
OC	COMM	Community Groups	0	n/a	0
OC	ENV	Environmental Groups	6	n/a	6
OC	FARM	Local Farmers	69	n/a	69
OC	GYPS	Gypsy & Travellers	4	n/a	4
OC	HASS	Housing Associations	12	n/a	12
OC	HLTH	Health Groups	4	n/a	4
OC	IB	Interested Bodies	29	n/a	29
OC	ISP	Infrastructure Service Providers	4	n/a	4
OC	LO	Land Owners	17	n/a	17
OC	LO Agent	Landowner Agent	4	n/a	4
OC	LPD	Local Property Developers	35	n/a	35
OC	LPD Agent	Local Property Developer Agent	6	n/a	6
OC	LRN	Learning Groups	8	n/a	8
OC	MISC	Miscellaneous	25	n/a	25
OC	NCC	Nature Conservation/Countryside Bodies	3	n/a	3
OC	RB	Recreation Bodies	7	n/a	7
OC	RESI	Residential Caravan Parks in Fylde	9	n/a	9
OC	RSL	Registered Social Landlords	3	n/a	3

OC	SC/B	Sports Clubs/Bodies	9	n/a	9
OC	SCH	Schools	19	n/a	19
OC	TB	Transport Bodies and Groups	5	n/a	5
OC	UC	Design/Townscape/Urban Conservation	2	n/a	2
OC	CLLR	Councillors	0	n/a	0
Total			497	575	1,072

* The split for emails sent to different consultee groups is not available

About this consultation



The Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042 is the first stage where the public is involved in making the new Local Plan.

The consultation asks a number of questions as to what should be contained in the new Local Plan

**The consultation is open between:
18th September and 30th October**

The consultation can be viewed online at www.fylde.gov.uk/2042 or by scanning the QR code.



Respond by:

- the online form
- Email to planningpolicy@fylde.gov.uk
- In writing to Planning Policy, Fylde Council, St Annes Road West, Lytham St Annes FY8 1LW

What is a Local Plan?

A Local Plan is a document produced under planning legislation that sets out policies for the development and use of land within an area. The existing Local Plan for Fylde is the Fylde Local Plan to 2032 (incorporating Partial Review), adopted in December 2021). Once adopted, the Local Plan becomes the statutory development Plan for the area. Planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.



The Local Plan is accompanied by a Policies Map which shows where the various policies apply

The existing Policies Map

Timetable for the new Local Plan



Key dates:

Options, Issues, Vision and Scope Consultation:

September-October 2025

Preparation of Local Plan:

Until April 2026

Publication of Local Plan for public consultation:

May-June 2026

Submission of Local Plan to Secretary of State:

August 2026

Examination in Public:

September 2026-September 2027

Adoption:

October 2027

Why make a new Local Plan for Fylde?



Current government rules mean that policies remain up to date only for up to 5 years from adoption, where the housing figure in the plan is significantly below the government's current figure. This means that Fylde's current Local Plan will remain up to date only until December 2026. Once policies are no longer up to date, they can be overridden by inspectors, when developers make appeals against Council decisions.

Do you agree that the Council should produce a new/amended Local Plan?

A new or updated Local Plan, if adopted in 2027 as planned, would cover the period until 2042. In the event that Fylde Council ceases to exist, any replacement authority for the area would be compelled to make decisions in accordance with the Fylde Local Plan to 2042, as the adopted statutory Development Plan

Vision



Delivering **excellence** to the community

The Vision sets out what the Council envisage the Borough will be like in 2042, if the Local Plan is adopted and delivered. It is summarised by the initial sentence, also from the Council's Corporate Plan:

In 2042, Fylde will be a place where people choose to live, work and raise a family, retire and feel safe, visit and want to return.

The Vision can be read in full in the consultation document.



Scan the QR code to view the consultation document

Comments are invited on the Vision set out in the document.

Do you support the Vision?

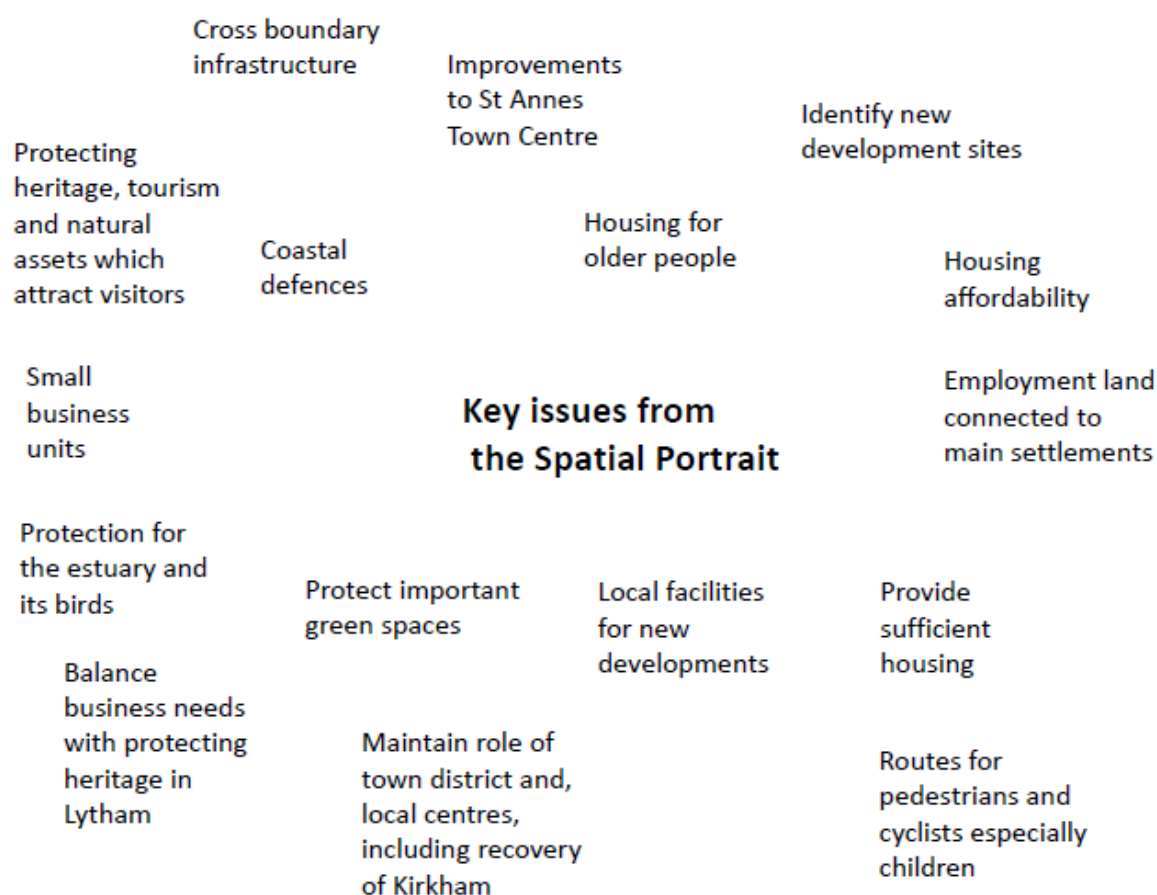
Should anything be added, removed or changed?

Spatial Portrait



Delivering **excellence** to the community

The Spatial Portrait is a description of the main characteristics of the borough, each of its main settlements and the rural area, and highlighting issues arising for the new Local Plan.





Delivering **excellence** to the community



LOCAL GREEN SPACE

National Planning Policy Framework - advice

Can all communities benefit from Local Green Space?

Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.



Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (see National Planning Policy Framework paragraph 171, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework paragraphs 7-9).

Parks and Gardens
Semi natural greenspaces
Amenity greenspace
Children's play areas
Allotments
Cemeteries/churchyards
Sports & recreation areas

Local Green Space must be close the community it serves and special to the community e.g. due to its beauty, historical significance, recreational value, tranquillity or wildlife

Are there areas of existing open space that are so important that they should be protected by Local Green Space designation? Please give details if you believe so.



Town, district and neighbourhood centres



Delivering **excellence** to the community



Key issues:

- Should town centre boundaries be extended to meet additional need for convenience retail provision?
- Where should any additional convenience retail premises be provided?
- Should policies set out specific requirements on the application of the sequential test for identifying sites for town centre uses?
- Should smaller neighbourhood centres be identified?

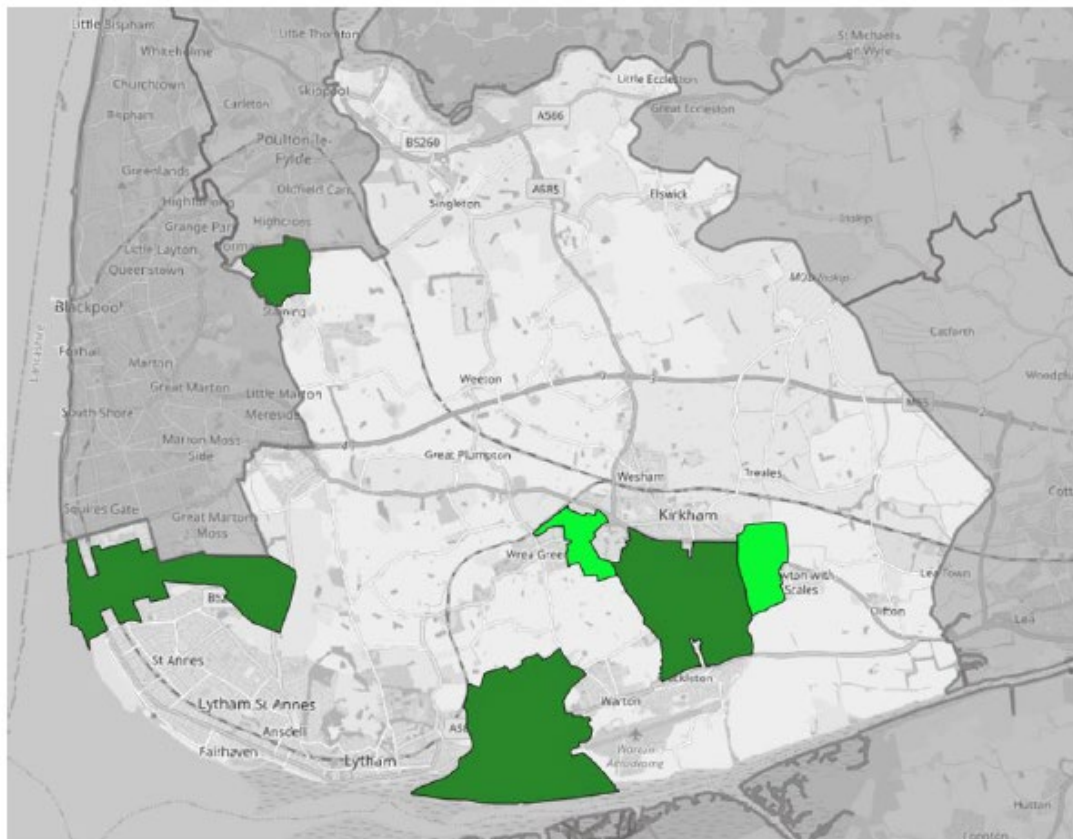
Areas outside settlements



Delivering **excellence** to the community

The current Local Plan has three levels of importance for spaces outside settlements:

- Green Belt (most restricted policies) (dark green on the map below)
- Areas of Separation (bright green on the map below)
- Countryside (still restricted, but less strict)



Key issues:

- The Council does not believe that exceptional circumstances exist to review the green belt – do you agree or disagree?
- Would you support the retention of the Areas of Separation or their reduction or removal?
- Do you support the three-tier approach?

Heritage assets



Delivering **excellence** to the community

Fylde currently has 3 Registered Parks and Gardens, 10 Conservation Areas and over 200 Listed Buildings, termed as “designated heritage assets” in national policy and given strong protection.

Through the Local Listing Project, Fylde Council has identified non-designated heritage assets, however this is not an exhaustive record.

Key issues:

- Should the Council consider designating additional Conservation Areas (outside the plan-making process)? If so what areas should be considered? For example Ansdell, Clifton, Freckleton centre etc?
- What views do you have on how the new Local Plan should approach the requirement to protect heritage assets, including those without designation?
- Should the Council consider designating additional non-designated assets in the Borough?

The Development Strategy: where should development go?



Option 1: Existing Development Strategy Updated



Option 2: Variant on Existing Development Strategy



Option 3: Entirely New Development Strategy

Option 1

Existing Development Strategy Updated



Delivering **excellence** to the community



Four strategic locations:

- St Annes
- Whitehills and Whyndyke
- Warton
- Kirkham and Wesham

Map data from Open Street Map Open Database Licence <https://www.openstreetmap.org/copyright>

Option 2

Variant on Existing Development Strategy



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Removal or addition of a strategic location. Could include

- Borough boundary with Wyre
- Borough boundary with Preston

New locations would require additional strategic infrastructure support

Option 3

Entirely new Development Strategy



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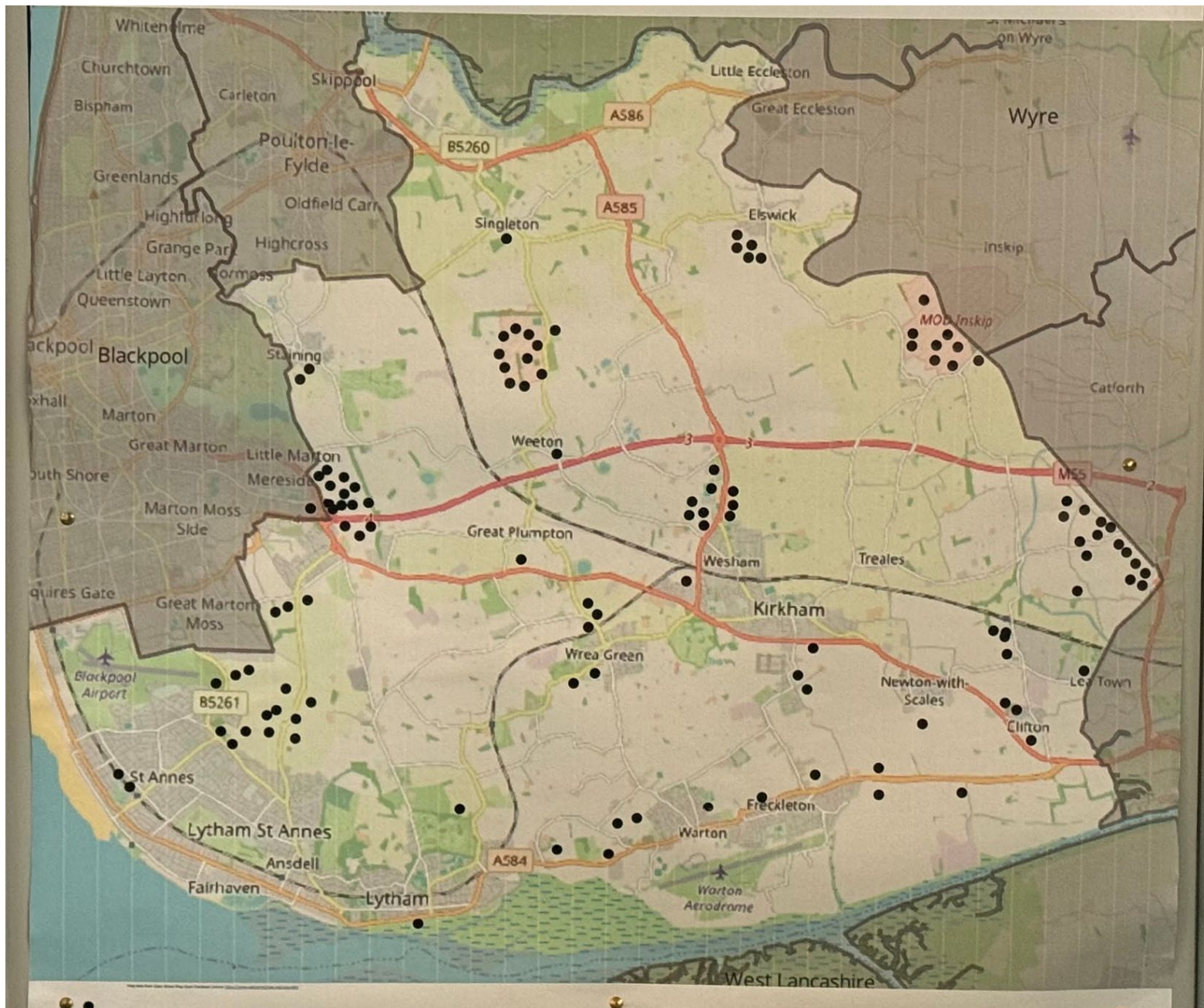


Could be

- Narrowly defined
- Widely dispersed
- Include entirely new settlements

Would require a substantial body of evidence in support

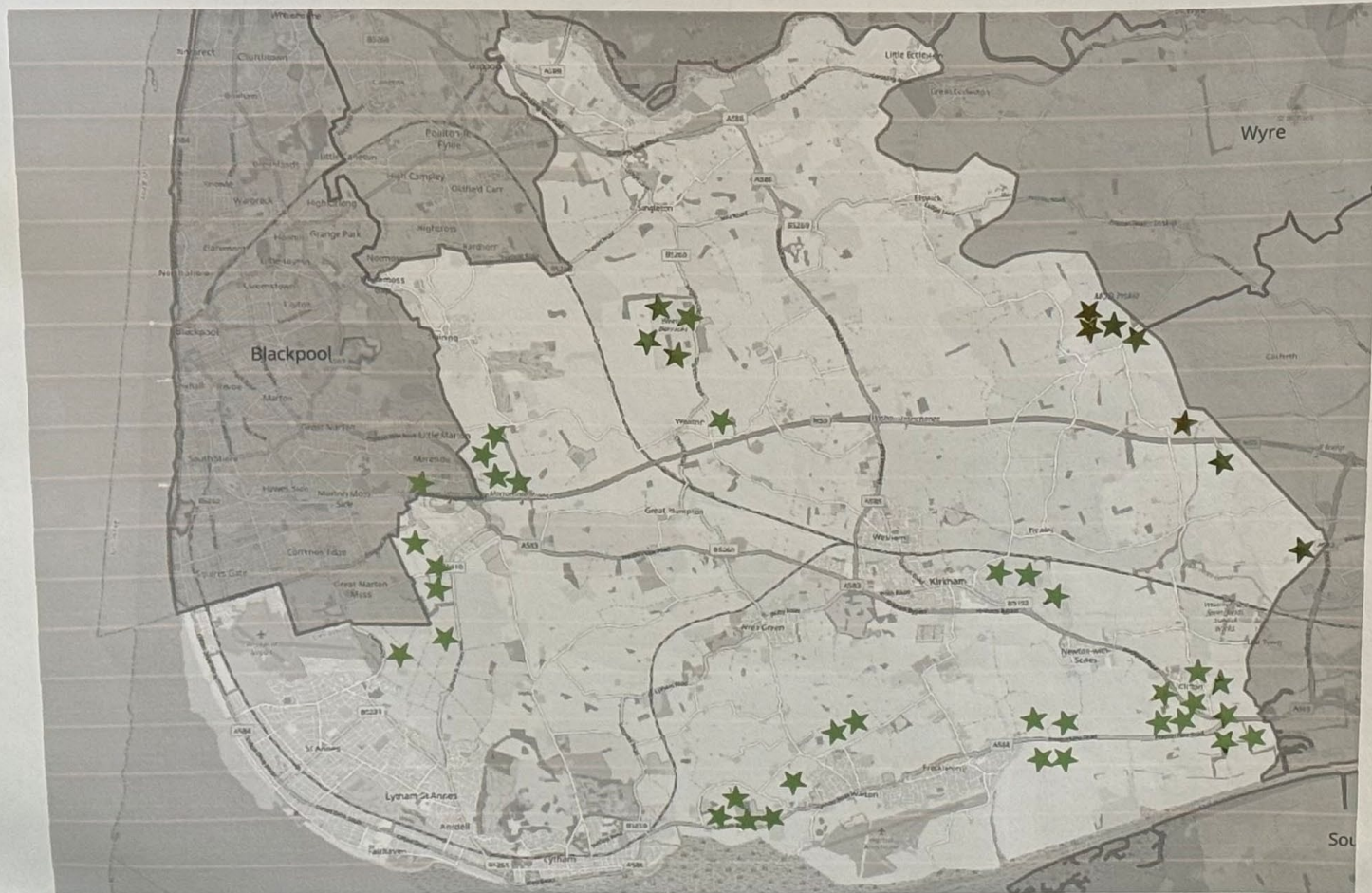
Map data from Open Street Map Open Database Licence <https://www.openstreetmap.org/copyright>



Suggest your Option 3 strategic locations for development!



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Map data from Open Street Map Open Database Licence <https://www.openstreetmap.org/copyright>



Press Release

Issued by: Fylde Council

Tel: 01253 658499

Email: communications@fylde.gov.uk

Issued:

Have Your Say on Fylde's Future as Council Launches Major Planning Consultation

Residents across Fylde have a unique opportunity to shape how their communities will develop over the next two decades, as Fylde Council launches its first public consultation on the new Local Plan to 2042.

Following approval at the Executive Committee meeting on Tuesday 16 September, the wide-ranging consultation invites everyone who lives, works or has an interest in Fylde to share their views on crucial decisions that will affect the Borough's future. From where new homes should be built and protecting precious green spaces, to supporting local businesses and looking after the environment, your input will help create the blueprint for Fylde's development until 2042.

The Council is required to update its Local Plan every five years to maintain control over where development happens in the Borough. Without an up-to-date plan, the Council could lose its ability to direct development to the most appropriate locations. The Government has set an increased housing requirement for Fylde of 410 homes per year, and the new Local Plan must allocate sufficient land to meet this target alongside the expected requirements for industrial and other uses.

The new Local Plan will determine where that development happens, what gets built, and importantly, which areas remain protected. It will influence everything from the types of homes available for families and older residents, to ensuring that provision of school places, healthcare facilities and transport links keep pace with growth.

Councillor Karen Buckley, Leader of Fylde Council, commented: "This is our residents' chance to tell us what matters most to them about Fylde's future. Whether it's ensuring that young people can afford homes here, protecting our beautiful coastline and countryside, or creating opportunities for businesses to thrive, we want to hear your views.

"Every response will help shape the plan that will guide our borough's development for the next generation."

Councillor Richard Redcliffe, Deputy Leader of Fylde Council and Chair of the Planning Committee, added: "As Planning Committee Chair, I know how vital it is that development happens in the right

places and delivers real benefits for our communities. This consultation gives residents the power to influence those decisions directly. Your local knowledge and insights are invaluable in helping us create a plan that protects what makes Fylde special while ensuring we meet the needs of current and future generations."

The consultation runs until Thursday 30 October 2025 and responding couldn't be easier. The quickest way is through the online form [here](#).

Alternatively, email planningpolicy@fylde.gov.uk or write to the Planning Policy Team, Fylde Council, Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW. Please indicate which question you're addressing in your response.

ENDS

Press enquiries

For more information regarding this press release please contact the Communications and PR office on communications@fylde.gov.uk or call 01253 658499

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Twitter: @fyldecouncil

Sign up to our newsletter: <https://new.fylde.gov.uk/sign-up-to-our-newsletter/>

Fylde Council

Public Consultation

Regulation 18

The Town and Country Planning (Local Planning) (England) Regulations 2012

Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042

The Council is consulting on the Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042 for six weeks to 5.00pm on Thursday 30th October 2025.

The Fylde local Plan to 2042 will be the new statutory Development Plan for the Borough of Fylde. It will allocate land to provide for development needs and set out policies for the development and use of land in the Borough. The Options, Issues, Vision and Scope for the new Fylde Local Plan to 2042 document provides an opportunity for you to let us know what should be included in the new plan.

The consultation can be viewed at www.fylde.gov.uk/2042.

The consultation document is also available for inspection at Fylde Council, Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW and at libraries throughout the Borough. Please visit www.lancashire.gov.uk/libraries/ for library locations and opening times.

The easiest way to make comments is through the online form. This can be reached from the web page www.fylde.gov.uk/2042.

Alternatively comments may be made by email to planningpolicy@fylde.gov.uk, or by post to Planning Policy, Planning Department, Fylde Council, Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW, to be received by the deadline of 5pm on 30th October 2025.

All comments will be published, but apart from the name of the sender no other personal information will be publicly available. Name, email and/or address details as applicable will be retained by the Council, in order to inform respondents of later stages in the plan-making process and other Fylde Planning Policy consultations, but for no other purpose. Anonymous comments will not be accepted.

Paul McKim

Service Director, Planning and Building Control

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The Latest News from Fylde Council

Have Your Say on Fylde's Future as Major Planning Consultation Launches

Residents across Fylde have a unique opportunity to shape how their communities will develop over the next two decades, as Fylde Council launches its first public consultation on the new Local Plan to 2042. The consultation, available on our website, will run until Thursday 30 October 2025

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Appendix 9: Website News Article

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Have Your Say on Fylde's Future as Council Launches Major Planning Consultation

Have Your Say on Fylde's Future as Council Launches Major Planning Consultation

Posted on September 18, 2025 by [Fylde Council](https://new.fylde.gov.uk/author/fylde-council/) (<https://new.fylde.gov.uk/author/fylde-council/>) in [News](https://new.fylde.gov.uk/category/news-page/) (<https://new.fylde.gov.uk/category/news-page/>)

Residents across Fylde have a unique opportunity to shape how their communities will develop over the next two decades, as Fylde Council launches its first public consultation on the new Local Plan to 2042.

Following approval at the Executive Committee meeting on Tuesday 16 September, the wide-ranging consultation invites everyone who lives, works or has an interest in Fylde to share their views on crucial decisions that will affect the Borough's future. From where new homes should be built and protecting precious green spaces, to supporting local businesses and looking after the environment, your input will help create the blueprint for Fylde's development until 2042.

The Council is required to update its Local Plan every five years to maintain control over where development happens in the Borough. Without an up-to-date plan, the Council could lose its ability to direct development to the most appropriate locations. The Government has set an increased housing requirement for Fylde of 410 homes per year, and the new Local Plan must allocate sufficient land to meet this target alongside the expected requirements for industrial and other uses.

The new Local Plan will determine where that development happens, what gets built, and importantly, which areas remain protected. It will influence everything from the types of homes available for families and older residents, to ensuring that provision of school places, healthcare facilities and transport links keep pace with growth.

Councillor Karen Buckley, Leader of Fylde Council, commented: "This is our residents' chance to tell us what matters most to them about Fylde's future. Whether it's ensuring that young people can afford homes here, protecting our beautiful coastline and countryside, or creating opportunities for businesses to thrive, we want to hear your views.

"Every response will help shape the plan that will guide our borough's development for the next generation"

Councillor Richard Redcliffe, Deputy Leader of Fylde Council and Chair of the Planning Committee, added: "As Planning Committee Chair, I know how vital it is that development happens in the right places and delivers real benefits for our communities. This consultation gives residents the power to influence those decisions directly. Your local knowledge and insights are invaluable in helping us create a plan that protects what makes Fylde special while ensuring we meet the needs of current and future generations."

The consultation runs until Thursday 30 October 2025 and responding couldn't be easier. The quickest way is through the online form [here](https://www.fylde.gov.uk/2042) (<https://www.fylde.gov.uk/2042>).

Alternatively, email planningpolicy@fylde.gov.uk (<mailto:planningpolicy@fylde.gov.uk>) or write to the Planning Policy Team, Fylde Council, Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW. Please indicate which question you're addressing in your response.

Keep up to date with the latest Fylde Council news by following us on social media or subscribing to our newsletter. Any new information will be posted directly through these channels, so if you are following us, you'll be the first to know.

- **Sign up to our newsletter** (<https://new.fylde.gov.uk/sign-up-to-our-newsletter/>)
- **Follow us on Facebook** (<https://www.facebook.com/fylde>)
- **Follow us on Twitter** (<https://twitter.com/fyldecouncil>)
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Appendix 10: Facebook Social Media Post

**Fylde Council**
18 Sep 2025 · 🌐

Fylde's future is in YOUR hands 🌐

From new homes to green spaces, and schools to transport, your voice will shape our borough up to 2042.

👉 Find out more: <https://ow.ly/lvgf50WXXPa>

👉 Have your say: <https://ow.ly/ffgu50WXXPe>

#FyldeFuture #HaveYourSay #LocalPlan2042



HAVE YOUR SAY

Share your views on Fylde's Local Plan to 2042
Deadline: Thursday 30 October

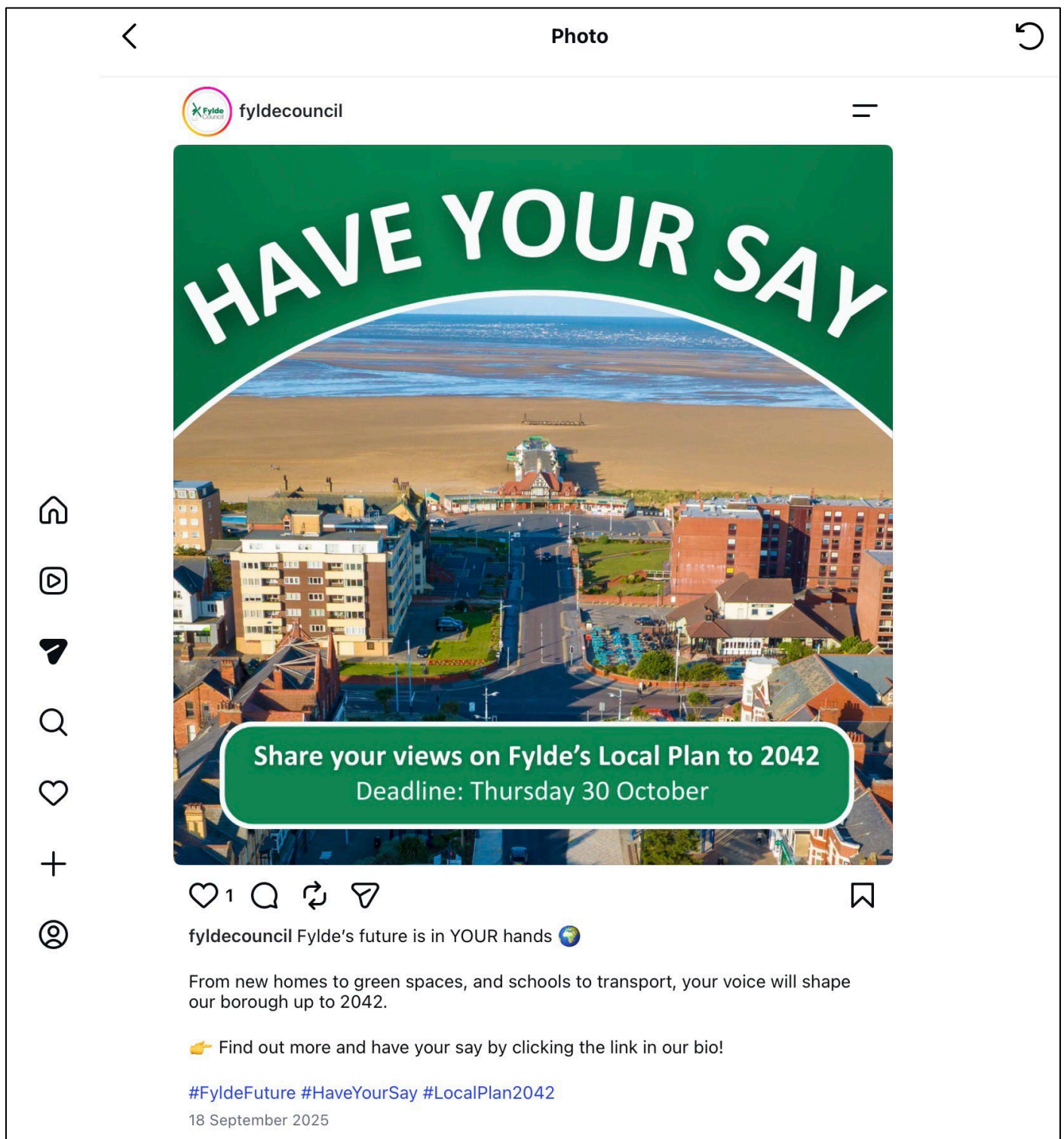
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Write a comment...

Appendix 11: Instagram Social Media Post





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This document/publication is also available on our website at www.fylde.gov.uk.

Any enquiries regarding this document/publication should be sent to us at the Town Hall, St Annes Road West, St Annes FY8 1LW, or to listening@fylde.gov.uk.