0023

0023/M/01/B1

Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	3
Response Date	10/10/18 17:18
Status	Submitted
Submission Type	Web
Version	0.1
Are you responding as an agent?	No

PERSONAL DETAILS

Please provide your personal details (or your client's details if you are an agent).

Title	Mr
First name (required)	Robert
Last name (required)	Cooke
Address (required)	[redacted]
Postcode (required)	[redacted]
E-mail address	[redacted]
Telephone Number	0

Please indicate below whether or not you wish your personal details to be recorded for the purposes of progressing local planning in Wyre. Unless you indicate otherwise below, your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan and other local planning documents that may be produced. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at planning.policy@wyre.gov.uk or 01253 887231.

Yes - I WOULD like my personal details to be recorded on the council's local plan consultation database

Please provide your comment on legal compliance below. If you consider the main modifications to the Local Plan, and/or the Sustainability Appraisal Addendum 2018, not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific main modification reference numbers if required.

There is a conflict between what may be legally compliant (ie it meets government requirements) and what is not (ie it may take full account of wishes of the indiginous community even when it conflicts with national policies).

Document SD007h reveals a significant problem for the Borough in that, because of pressure from Government they have to meet "targets", while at the same time they face criticism from the Inspector for the siting of some development and the use of agricultural land. To my great surprise he even mentioned its character and beauty. There is also argument over the exact number of houses which should be built.

There is debate over the pricing of new homes, correctly citing the fact that the Fylde is generally a low-income area yet with the cost of many new-builds being marketed at eye-watering prices which will result in unsustainable mortgage repayments, yet it is not the Council which sets the market price.

The Inspector designated the development at Inskip as "disproportionate", but I would contend that that very term could equally be applied to Poulton-le-Fylde and Garstang, for those towns do not have the basic infrastructure to accommodate the increased population and traffic which the extra houses will create (if they can sell them!)

The Inspector mentioned the danger of flooding at Inskip. I notice no mention of flooding caused by the development on Garstang Road East, Poulton, yet when the plans were first mooted residents on the Mains Lane side of the plot and near Poulton Industrial Estate were already warning of flooding.

I notice that on the document examining the effects of development on traffic the representatives of the developers all seemed to think there would be no problem wherever they built. I wonder why?

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

Do you wish to make an additional individual representation on "soundness" of the Local Plan? No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

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Do you wish to participate at the oral part of the examination if the Inspector considers that further hearings are necessary? Please note that the process for undertaking the examination, including subjects/ matters to be addressed and participants, will be decided by the Inspector. No

If you would like a copy of your representation please select YES. A copy will be sent to your email address provided in section A (or postal address if no email address is provided).

Yes

Rec'd 24/10/18

Blackpool Council

0032

Date: 24.10.18

0032/M/01-07/C.

Planning Policy Team
Wyre Council
Civic Centre
Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

Direct Line: [redacted]
Email: planning.strategy@blackpool.gov.uk

Dear Sir/Madam,

Wyre Publication Draft Local Plan – Proposed Main Modifications Consultation

1.1 Thank you for consulting Blackpool Council on the Proposed Main Modifications to the Wyre Local Plan. We welcome the opportunity to comment.

1.2 The Inspector's Post Hearing Advice on Main Modifications and Related Matters (05.07.18) sets out two options to deal with identified highway and transport issues in order to progress the Wyre Local Plan. Wyre has chosen Option 2, which requires a partial plan review with the objective of submission within 3 years of the adoption of the Local Plan. Paragraph 13 of the Inspector's advice sets out that the purpose of both options would be to ensure that the OAN would be met by allocating more sites alongside the necessary infrastructure.

MM/002
0032/M/01/C
MM/003
0077/M/02/C

1.3 However, we do not consider that this advice is properly reflected in the modified text set out in MM/002 which gives the impression that a plan review may be secondary to a further request for assistance from neighbouring authorities. This is also the case in the modified text in amended paragraph 4.1.21 of MM/003 which before making any reference to the partial review mechanism states that "The Council is committed to on-going engagement with adjoining local authorities with regards to meeting the shortfall outside Wyre in adjoining local authorities. This is a matter of consideration for the Local Plans of adjoining local authorities". This text in paragraph 4.1.21 is not required and we suggest that it is deleted. The primary focus in both MM/002 and MM/003 should be on the review mechanism.

1.4 New paragraph 1.4.5 in MM/002 states that "A duty to cooperate meeting was held on 14 November 2017 with all adjoining authorities. It was agreed that adjoining local authorities will consider if and how they can assist Wyre with the housing shortfall once the quantum of the shortfall has been agreed through the Wyre Local Plan examination." This is not a position that Blackpool agreed to at this meeting. At the meeting it was agreed that the issue of Wyre's OAN and any shortfall would be addressed through the examination process and that Blackpool (and Fylde) would put their views forward as such. As set out in our representations (dated 03.11.17) to the Publication Draft Local Plan we did not consider the OAN figure of 479 to be justified and disputed some of the assumptions made that restricted housing capacity over the plan period. We suggest that new paragraph 1.4.5 in MM/002 is deleted.

1.5 We do not consider new paragraph 1.4.7 in MM/002 is needed because amended paragraph 1.4.5 (beginning "The Duty to Cooperate Statement sets out...") summarises the situation with regard to the Duty to Cooperate. In addition, as set out in our representations to the Publication Draft Local Plan (paragraphs 2.5 – 2.9) we had some concerns about the timing of the provision of evidence to support Wyre's approach, which is not reflected in the text in new paragraph 1.4.7.

1.6 MM/003 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists. Therefore, reference to meeting 97% of the OAN requirement could be removed from MM/003, MM/004, MM/021, MM/048 and MM/089.

1.7 If there is no shortfall, this would also bring into question the need to for a partial review of the plan as set out in MM/090 and referred to in MM/002, MM/003 and MM/089.

1.8 In addition, the revised National Planning Policy Framework (NPPF) was published in July 2018 and any proposed partial review of the Wyre Local Plan will need to take this into account. The revised NPPF introduces a standard methodology for calculating local housing need, which results in a housing figure for Wyre of 331 dwellings per annum. This is significantly lower than the identified OAN range and Wyre's identified delivery figure of 464 dwellings. Under the standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process. We suggest that the modifications that refer to the partial review (MM/002, MM/003, MM/089 and MM/090) acknowledge that a review of local housing need may be required to reflect this change to national policy.

Yours faithfully,

Yours sincerely

Ms Jane Saleh - Head of Development Plans and Projects

MM/002 - 0032/M/01/C
MM/003 - 0032/M/02/C
MM/004 - 0032/M/03/C
MM/021 - 0032/M/04/C
MM/048 - 0032/M/05/C
MM/089 - 0032/M/06/C
MM/090 - 0032/M/07/C

Date Received 23.10.18 Rep no. 0051/M/01-08/1

Wyre Borough Council Online

Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	8
Response Date	23/10/18 10:29
Status	Submitted
Submission Type	Web
Version	0.1
Please add your personal ID number (if known)	
	0051
Are you responding as an agent?	No

PERSONAL DETAILS

Please provide your personal details (or your client's details if you are an agent).

Title	[redacted]
First name (required)	[redacted]
Last name (required)	[redacted]
Organisation (if relevant)	on behalf of Wyre Labour Group Of Councillors
Address (required)	[redacted]
Postcode (required)	[redacted]
E-mail address	[redacted]
Telephone Number	[redacted]

Please indicate below whether or not you wish your personal details to be recorded for the purposes of progressing local planning in Wyre. Unless you indicate otherwise below, your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan and other local planning documents that may be produced. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at planning.policy@wyre.gov.uk or 01253 887231.

Yes - I WOULD like my personal details to be recorded on the council's local plan consultation database

Do you consider the proposed main modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant? No 0051/M/01/B1

Please provide your comment on legal compliance below. If you consider the main modifications to the Local Plan, and/or the Sustainability Appraisal Addendum 2018, not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific main modification reference numbers if required.

Although the modifications may have resulted in some improvements in policy, if the draft local plan is approved it will still exacerbate the area's fundamental problems, particularly in the west of the Borough resulting in a reduced quality of life for its residents. As such the modifications have not made the plan itself legally compliant.

The comments made in the Labour Group Of Councillors' response on 1 Nov 2017 (Personal ID 0051) are therefore still valid and appropriate.

Main modification reference, MM: MM003 0051/M/02/C

Paragraph or policy reference: 4.1.11 / Appendix E (total residential development)

Do you consider this main modification to be "sound"? No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

- Not effective
- Not consistent with national planning policy

Please provide precise details of why you believe this main modification is not sound:

The amended para 4.1.11 states that "the Local Plan includes specific requirements as part of allocations for the provision of infrastructure to support the scale of proposed development in different settlements"

The modification disingenuously suggests that the necessary infrastructure for the scale of housebuilding proposed is being provided. The reality of the situation is far removed from the picture painted.

The A585 and many of the roads providing an alternative route out of Fleetwood and Thornton Cleveleys will be severely impacted by this plan, and the proposed Mains Lane bypass and future junction alterations at Norcross and Cleveleys will do nothing to address that issue.

There is no evidence that the employment and commute issues are being addressed by the plan's strategy, and indeed the plan will it seems make the problems worse. The plan for 9285 houses will result in an increased population of 20k plus, with much of this population increase coming from outside of Wyre. The plan does not provide the employment needed for this proposed population increase, and it will therefore exacerbate the commute and congestion issues. This in turn will result in new employers not being attracted to the area.

It is a downward spiral that is either not understood, or worse still, is being ignored.

Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording.

The current plan is unsound and in need of major modification to make it sound. It needs modifying so that it delivers a transport infrastructure and economic growth to Wyre as a prelude to housing, and not the continued build the houses and see what happens approach. Altering the wording of para 4.1.11 will have little effect, what is required is a fundamental change of mindset and strategy. Without that there is no hope of tackling the Borough's issues.

Do you wish to make an additional individual representation on "soundness" of the Local Plan?	Yes 0051/M/03/C
Main modification reference, MM:	MM006
Paragraph or policy reference:	SP2 (Sustainable Development)
Do you consider this main modification to be "sound"?	No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

- Not effective
- Not consistent with national planning policy

Please provide precise details of why you believe this main modification is not sound:

The amended para 6 states that "Development proposals must demonstrate how they respond to the challenge of climate change through appropriate design"

The Intergovernmental Panel on Climate Change (IPCC) report shows unprecedented changes are needed across society to limit global warming to 1.5C above pre-industrial levels. This modification does not sufficiently reflect the seriousness of the impact of climate change.

Please specify any further modifications needed to make this main modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording.

It is completely unclear what the appropriate design requirements would be. The Council cannot afford for any complacency whatsoever with regard to the dangers of climate change, and in accordance with that the requirements need to be more prescriptive (the unprecedented changes needed refers).

Do you wish to make an additional individual representation on "soundness" of the Local Plan?	Yes 0051/M/04/C
Main modification reference, MM:	MM013 / MM014 0051/M/05/C
Paragraph or policy reference:	SP8 (Health & Well Being) & CDMP1 (Environmental Protection)
Do you consider this main modification to be "sound"?	Yes

Please provide additional information below if you wish.

It isn't so much that the modification is or isn't sound, more that the housing allocations are not consistent with these policies.

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

- Not effective

Please provide precise details of why you believe this main modification is not sound:

The transport infrastructure (lack of rail reinstatement, ineffective 'improvements' to A585) will not support the level of development proposed. Development of housing allocations in Thornton Cleveleys and Fleetwood will increase congestion and result in a deterioration in air quality on the A585 (Skippool to Fleetwood), Lambs Road, Lawsons Road, Trunnah Road, and Fleetwood Road North. The health and well being of residents in these areas is not being considered.

Please specify any further modifications needed to make this main modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording.

The wording for SP8 and CDMP1 is not unreasonable but the housing allocations in Thornton Cleveleys contravene these policies, and should be reconsidered.

Do you wish to make an additional individual representation on "soundness" of the Local Plan?	Yes	0051/M/066/C
Main modification reference, MM:	MM024	
Paragraph or policy reference:	HP2 (Housing Mix)	
Do you consider this main modification to be "sound"?	No	

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

- Not effective
- Not consistent with national planning policy

Please provide precise details of why you believe this main modification is not sound:

The Plan recognises a shortage of smaller properties in Wyre, but no specific action has been taken to ensure the supply of each house type matches demand.

a) Fylde Coast SHMA Para 5.33 – Average household size has decreased from 2.29 to 2.24 between 2001 and 2011

b) Fylde Coast SHMA Para 4.44 – Property sizes in Wyre increased from 5.38 to 5.59 rooms between 2001 and 2011.

c) Fylde Coast SHMA Para 4.41 – as of 2011, the average number of bedrooms per household in Wyre was 2.75, and importantly the proportion of under-occupied households was 78.4%.

Despite this evidence, the mix of housing on new developments continues not to reflect the needs of the community.

Please specify any further modifications needed to make this main modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording.

To inform future policy changes the supply and demand of each housing type needs to be formally and closely monitored, and policy adjusted / strengthened where required.

Do you wish to make an additional individual representation on "soundness" of the Local Plan? No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

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Do you wish to participate at the oral part of the examination if the Inspector considers that further hearings are necessary? Please note that the process for undertaking the examination, including No

subjects/ matters to be addressed and participants, will be decided by the Inspector.

If you would like a copy of your representation please select YES. A copy will be sent to your email address provided in section A (or postal address if no email address is provided).

Yes

Thornton Action Group

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only: Date Received		Rep. No.	0072 | M | 01-03 | B | C

PART B – LEGAL COMPLIANCE (MAIN MODIFICATIONS AND SUSTAINABILITY APPRAISAL ADDENDUM 2018 ONLY)

Q1 Do you consider the proposed Main Modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant?

Yes ☑ No ☐ 0072|M|01|B|

Please provide your comment on legal compliance below. If you consider the Main Modifications to the Local Plan and/or Sustainability Appraisal Addendum 2018 not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific Main Modification reference numbers if required.

Please fill out Part F if you need additional space

PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY)

0072|M|02|C

Q2 To which Main Modification does your representation on soundness relate? Please insert the relevant references in the boxes provided below. Please use a separate Part C continuation form for each additional Main Modification representation.

Main Modification Reference	**MM/ 099**

Paragraph or Policy Reference	

Q3a Do you consider this Main Modification to be "sound"?

Yes ☐ No ☑

For Office Use Only: Date Received		Rep. No.	

If YES please provide additional information below if you wish. If NO please answer question 3b.

Please fill out Part F if you need additional space

0072/m/02/C

Q3b If you do <u>not</u> consider this Main Modification to be sound, please specify on what grounds (see guidance note for additional information):

(Please tick one or more boxes as appropriate)

Not positively prepared ☑

Not justified ☐

Not effective ☐

Not consistent with national planning policy ☐

For Office Use Only: Date Received		Rep. No.	

Please provide precise details of why you believe this Main Modification is not sound:

Thornton Action Group fully supports the classification of the land between Raikes Road and the Wyre Estuary (B2) as Green Infrastructure with the added protection that this gives against development. We urge that the area to the south and east of Stanah School which is subject to a covenant be also classed as Green Infrastructure. The Covenant refers to keeping this land for recreational use.

Please fill out Part F if you need additional space

Q3c Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording. Please fill out Part F if you need additional space.

For Office Use Only: Date Received		Rep. No.	

PART D – SUSTAINABILITY APPRAISAL ADDENDUM 2018

Q4 – If you wish to comment on the Sustainability Appraisal Addendum 2018 please make your representation below.

Please fill out Part F if you need additional space

PART E – NEXT STEPS

Q5a Do you wish to participate at an oral part of the examination if the Inspector considers that further hearings are necessary?

Yes ☐ No ☑

Please note that the process for undertaking the examination, including subjects/matters to be addressed and participants, will be decided by the Inspector.

For Office Use Only: Date Received		Rep. No.	

Q5b If you wish to participate at an oral part of the examination, if held, it would be useful if you can explain why you think this is necessary.

Please fill out Part F if you need additional space

Submitting your representation

Representations can be submitted using the on-line form which can be accessed and completed on-line at www.wyre.gov.uk/localplan

The representation form can also be downloaded from www.wyre.gov.uk/localplan

The completed form can be submitted by:

e-mail at planning.policy@wyre.gov.uk or
Post to Planning Policy Team, Wyre Council, Breck Road, Poulton-le-Fylde, FY6 7PU.

If you would like assistance in completing your representation or have any other questions about the emerging Wyre Local Plan, please contact the Planning Policy Team by e-mail planning.policy@wyre.gov.uk or by telephone on 01253 887235 or 01253 887231. Forms **must be received by 5pm on 24 October 2018. Late representations CANNOT be accepted.**

In submitting the form, you understand that the information given is to the best of your knowledge correct.

THORNTON ACTION GROUP

October 12th, 2018

Wyre Draft Local Plan

Response to
EL 7.001 Schedule of Main Modifications
EL 7,001b EL 8.008 Green Infrastructure Policies Amendments

0072|M|02|C

MM/099

1 Thornton Action Group fully supports the classification of the land between Raikes Road and the Wyre Estuary (B2) as Green Infrastructure with the added protection that this gives against development. We urge that the area to the south and east of Stanah School which is subject to a covenant be also classed as Green Infrastructure. The Covenant refers to keeping this land for recreational use.

2 Regarding the proposal for a new road between Slicock's Corner and Raikes Road, we wonder why Wyre Planners/Lancashire Highways wish to retain this link as a possibility? This seems to indicate an acceptance of the view that the existing roads – Lamb's Road and Skippool Road - will not be able to cope with the additional traffic created by the 360 houses and a primary school to be built on SA 1/2. To this must be added the increased volume of traffic along these roads which will result from the 400 houses to be built in North Thornton. However, this new link would be completely in the wrong place and would not in any way alleviate the problems on Lamb's Road/ Skippool Road. This matter needs to be urgently reconsidered.

MM/051

0072|M|03|C

0172/M/01-02/BL&C

Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	14
Response Date	24/10/18 16:55
Status	Submitted
Submission Type	Web
Version	0.1
Please add your personal ID number (if known)	
	0172
Are you responding as an agent?	Yes

AGENT DETAILS

Please provide your agent details.

Title	Miss
First name	Katie
Last name	Delaney
Organisation	Maybern Planning & Development

Address

Beehive Lofts, Beehive Mill, Jersey Street, Manchester

Postcode	M4 6JG
E-mail address	hello@maybern.co.uk
Telephone Number	[redacted]

PERSONAL DETAILS

Please provide your personal details (or your client's details if you are an agent).

Title	Mrs

First name (required)	Trudie
Last name (required)	Webster
Organisation (if relevant)	Ingle's Dawndew Salads Ltd

Address (required)

Fouldrey Avenue, Poulton-le-Fylde, Lancashire

Postcode (required)	FY6 7HE

Please indicate below whether or not you wish your personal details to be recorded for the purposes of progressing local planning in Wyre. Unless you indicate otherwise below, your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan and other local planning documents that may be produced. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at planning.policy@wyre.gov.uk or 01253 887231.

Yes - I WOULD like my personal details to be recorded on the council's local plan consultation database

Do you consider the proposed main modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant?	No 0172/M/01/81
Main modification reference, MM:	MM/022 0172/M/02/C
Paragraph or policy reference:	7.2.5
Do you consider this main modification to be "sound"?	No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

- Not positively prepared
- Not justified
- Not effective
- Not consistent with national planning policy

Please provide precise details of why you believe this main modification is not sound:

The Council considers that the Liverpool method is the most appropriate method to make up the shortfall in housing delivery. We disagree and consider that the Sedgefield approach would be more appropriate and would ensure that unmet need is addressed in the first 5 years of the plan period. This would be in accordance with the guidance at NPPG paragraph 044 (Reference ID: 3-044-20180913) "*The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach). If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal*". We do not consider that the Council have robustly justified the longer period (the proposed Liverpool method).

Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording.

Our client's site is currently used for horticultural and agricultural purposes by Ingle's Dawndew Salad Ltd and is located to the north west of Poulton-le-Fylde within the defined settlement. It is the intention of the landowner to relocate the business within the short term (5 year) period. The business is rural in nature and the surrounding area has seen significant change since 1990 when the site was originally deemed suitable. The location of the facility at Fouldrey Avenue is increasingly restrictive to the modernisation and efficiency of the business, as an example of that access to Rural Development / LEADER funding is restricted as the present location is considered to 'urban'. This means that the Company is at a competitive disadvantage in the sector when it comes to its future and investment. The landowner is therefore in the process of seeking an alternative site in the area to facilitate a relocation. Further planned residential development in the immediate area is a significant concern over matters such as food security (there has been an increase in trespassing at the site) and haulage vehicle movements being restricted so as not to become a nuisance to nearby residents. The relocation of the premises will also grant the company an opportunity to deliver modernisation of the facilities which have now been in situ for almost 30 years. Ingle's Dawndew Salads are engaging with the Authority on a pre-application basis. As per previous representations made to the Local Plan (Personal Local Plan ID 0172) this site should be allocated for residential development with potential to increase the short term housing land supply, assisting the Council in addressing the shortfall earlier in the plan period.

Do you wish to make an additional individual representation on "soundness" of the Local Plan? No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

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Do you wish to participate at the oral part of the examination if the Inspector considers that further hearings are necessary? Please note that the process for undertaking the examination, including subjects/ matters to be addressed and participants, will be decided by the Inspector.	Yes

If you would like a copy of your representation please select YES. A copy will be sent to your email address provided in section A (or postal address if no email address is provided).

Yes

0222/M/01-02/B1,C

Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	2
Response Date	12/09/18 17:14
Status	Submitted
Submission Type	Web
Version	0.1
Are you responding as an agent?	No

PERSONAL DETAILS

Please provide your personal details (or your client's details if you are an agent).

Title	Mr
First name (required)	Ric
Last name (required)	Dumbleton
Address (required)	[redacted]
Postcode (required)	[redacted]
E-mail address	[redacted]
Telephone Number	[redacted]

Please indicate below whether or not you wish your personal details to be recorded for the purposes of progressing local planning in Wyre. Unless you indicate otherwise below, your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan and other local planning documents that may be produced. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at planning.policy@wyre.gov.uk or 01253 887231.

Yes - I WOULD like my personal details to be recorded on the council's local plan consultation database

Do you consider the proposed main modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant? Yes 0222/M/01/B1

Do you consider this main modification to be "sound"? Yes 0222/M/02/C

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

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Do you wish to participate at the oral part of the examination if the Inspector considers that further hearings are necessary? Please note that the process for undertaking the examination, including subjects/ matters to be addressed and participants, will be decided by the Inspector.	No

0290/M/01-02/CD

rec'd 24/10/18

Fylde Council

Planning Policy Team,
Wyre Council,
Civic Centre,
Breck Road,
Poulton-le-Fylde,
Lancashire
FY6 7PU.

0290

Our Ref:

Your Ref:

Please Ask For: Mark Evans

Telephone: [redacted]

Email: [redacted]

Date: 24 October 2018

Dear sir/madam

Main Modifications to the Publication Draft Wyre Local Plan

Thank you for the opportunity for Fylde Council to comment on the Main Modifications to the Wyre Local Plan.

The Inspector's letter of 5th July, following the hearing sessions, has offered Wyre Council two options, of which it has chosen option 2, which requires a review within 3 years of the adoption of the plan at Examination now. The letter, in paragraph 13, states what work would be required in terms of highways constraints and transport infrastructure. It concludes that the purpose of both options would be to ensure that the OAN would be met by allocating more sites alongside the necessary infrastructure.

MM002

However the paragraphs 1.4.5 to 1.4.8 as proposed for modification (noting that not all parts of these modifications as shown on the tracked changes version appear in the Main Modification schedule) give the clear impression that the review would be secondary to a (further) request for assistance in meeting unmet housing need outside Wyre. This is not justified.

Paragraph 1.4.5 should be deleted. The wording to paragraph 1.4.7 should remove the first part of the sentence: "Although...provided for," and should begin with "The Duty to Cooperate Statement..." The last two sentences of that paragraph should be removed altogether. Paragraph 1.4.8 should be revised to read "...which brought the housing land supply ~~closer to the identified housing OAN~~ within the OAN range indicated by the evidence. However due to the outstanding ~~shortfall~~ deficiency ~~and the existing position that no adjoining authority is able to assist Wyre in meeting unmet needs~~, the Local Plan includes a review mechanism..." This last sentence only need remain at all if the Inspector still considers that the OAHN is not met.

The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan, where a housing requirement figure of 415 has been adopted from an OAHN range of 410-430 (set out in Fylde SHMA Addendum 3 by Turley, who also produced the OAHN evidence for Wyre). The Inspector's report to the Examination of the Fylde Local Plan is attached for reference: this matter is dealt with in paragraphs 65-68. However the Wyre Local Plan as

modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.

Consequent on this, reference to the proportion of the OAHN requirement should be removed altogether in MM/003, MM/004, MM/021, MM/048 and MM/089 rather than altered to 97%. There would be implications on whether the modifications in MM/089 and MM/090 would still be necessary.

The requirement to review the plan within 3 years will be under the provisions of the 2018 Framework. Councils are required in any case to consider whether there is a need to partially revise Local Plans prepared under the 2012 Framework (or prepare a new plan) *"as quickly as possible"* (paragraph 212 of the 2018 Framework). Similarly, Fylde Council will need to consider the need to revise. The 2018 Framework alters the calculation of the minimum local housing need figure to the standard methodology. The standard methodology need figure for Wyre is significantly lower than the OAN range set out in Wyre's submission plan. Any review to the Fylde Local Plan to 2032 triggered by "unmet need" in Wyre would have to be conducted under the 2018 Framework, with housing need figures for each of the Fylde Coast authorities assessed using the standard methodology. It should therefore be acknowledged within those modifications that relate to the review (MM/002, MM/003, MM/089 and MM/090) that the review will include a reassessment of local housing need within its scope, under the provisions of the 2018 Framework.

Sustainability Appraisal Addendum Post Submission Main Modifications 0290/M/08/C

The Sustainability Appraisal provides an assessment of delivering 464dpa in comparison to the lower and upper limits of the OAN range (457dpa to 479dpa). According to the Local Plan 464dpa is the number of dwellings that can be delivered in Wyre during the plan period. The Sustainability Appraisal makes no assessment of the 3% deficiency in delivery associated with 464dpa and whether it will be delivered in Wyre. The sustainability appraisal should contain an appraisal of the unmet need (associated with the figure of 479dpa) having to be met in neighbouring authorities. Therefore, it does not satisfy our earlier request for a sustainability appraisal which allows a thorough assessment of the alternatives with respect to this issue and in compliance with the Environmental Assessment Regulations.

MM/002 - 0290/M/01/C
003 - 0290/M/02/C
004 - 0290/M/03/C
021 - 0290/M/04/C
048 - 0290/M/05/C
089 - 0290/M/06/C
090 - 0290/M/07/C

Yours faithfully

Mark Evans

Mark Evans

Head of Planning and Housing

The Planning Inspectorate

Report to Fylde Borough Council

by Yvonne Wright BSC (Hons) DipTP MSc DMS MRTPI

an Inspector appointed by the Secretary of State

Date 18 September 2018

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Fylde Council Local Plan to 2032

The Plan was submitted for examination on 9 December 2016

The examination hearings were held between 28 March 2017 and 13 December 2017

File Ref: PINS/M2325/429/1

Abbreviations used in this report

AA	Appropriate Assessment
DCLG	Department for Communities and Local Government
dpa	Dwellings per annum
DtC	Duty to co-operate
ELPS	Employment Land and Premises Study
EZ	Enterprise zone
GTAA	Gypsy, traveller and travelling showpeople accommodation assessment
HIA	Health impact assessment
HMA	Housing market area
HRA	Habitats regulations assessment
LCC	Lancashire County Council
MM	Main modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability appraisal
SCI	Statement of community involvement
SHBP	Settlement Hierarchy Background Paper
SHMA	Strategic Housing Market Assessment
SLD	Strategic Location for Development
SNHP	Sub-national household projections
SNPP	Sub-national population projections

Non-Technical Summary

This report concludes that the Fylde Council Local Plan (the Plan) provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Fylde Borough Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Updating the objectively assessed need and housing requirement to reflect the most up to date household projections;
- Making clear on what basis the 5 year housing supply will be calculated;
- More effectively setting out the development strategy to identify the amount of development to be delivered within the strategic and non-strategic locations;
- Ensuring that the components of housing land supply are up to date including the allocation of new sites with planning permission;
- Updating the requirement for gypsy and traveller pitches to reflect up to date evidence;
- Clarifying the purpose of areas of separation and amending how development within them will be determined;
- Including the provision of a new local retail centre at Whyndyke;
- Removing the requirement that new homes comply with all optional national technical standards;
- Amending the strategic and generic policies so that they are positively prepared, consistent with each other and national policy and clear to the decision maker; and
- Ensuring that the monitoring framework is clear and effective.

Introduction

1. This report contains my assessment of the Fylde Council Local Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (the Framework) (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised National Planning Policy Framework was published in July 2018. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 Framework will apply. Unless stated otherwise, references in this report are to the 2012 Framework.

2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound Plan. The Fylde Council Local Plan to 2032, submitted in December 2016 is the basis for my examination. It is the same document as was published for consultation in August 2016.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix.

4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the Fylde Council Local Plan to 2032 Policies Map and associated inset maps (SD002a-d).

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. Examples include where amendments and additions have been made to the site allocations under Policies SL1-SL5.

7. These further changes to the policies map were published for consultation alongside the MMs (EL10.005).

8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include the changes published alongside the MMs.

Interim Findings

9. Stage 1 hearings discussed strategic matters of soundness and legal compliance including duty to co-operate. On 11 April 2017, I issued a letter (EL5.003a) setting out my interim findings specifically on the duty to co-operate. This took account of all the relevant representations made and evidence submitted at the time of the Plan's preparation. My full reasoning for this is set out below under the section 'Assessment of Duty to Co-operate'.

10. My letter also recommended that the Council should carry out additional work in respect of the objective assessment of housing need to take account of the ONS 2014-based sub-national population projections (SNPP) and the Department for Communities and Local Government (DCLG) 2014-based sub-national household projections (SNHP). In response, the Council commissioned consultants to produce a further addendum to the SHMA (Addendum 3) and an Independent Assessment of the Economic Prospects of Fylde (EL5.003f). The Council also produced an updated housing land supply trajectory at the same time (EL5.003g).

11. Between 3 August 2017 and 14 September 2017, the Council consulted on this additional housing evidence along with other new evidence on the settlement hierarchy and gypsy and traveller accommodation assessment (EL7.002). Stage 3 hearings were held in December 2017 to consider the main issues related to these matters.

12. Further consultation was carried out on the schedule of proposed main modifications (EL10.002) and the addendum to the sustainability appraisal report (EL10.003) during February and March 2018, and I have taken account of all the representations made.

Consultation

13. Concern has been expressed about the Council's pre-submission consultation processes. Whilst considerable changes were made by the Council between different versions of the Plan this followed and was in response to significant periods of public consultation. This was carried out in accordance with the Council's Statement of Community Involvement (SCI) (BD093). Overall I am satisfied that the Council has carried out widespread public consultation on the Plan throughout its various stages and including the main

modifications. This has given residents and other interested parties an adequate opportunity to express their views. The consultation has met the legal requirements set out in the Regulations.

Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.

15. The Council's *Statement of Compliance with the Duty to Co-operate* (SD007) sets out the nature of the joint working which has been carried out in the preparation of the Plan. It identifies those aspects of the Plan that are considered by the Council to be strategic matters including homes and jobs; retail, leisure and other commercial development; infrastructure; health, security, community and cultural infrastructure and climate change and the natural and historic environment.

16. The statement also highlights a number of joint evidence bases on key matters within the wider Fylde Coast area including the *Fylde Coast Strategic Housing Market Assessment* (SHMA) (ED021) and subsequent Addendums (ED022 and ED023); the *Fylde Coast Gypsy and Traveller Accommodation Assessment* (ED020) and the subsequent update (EL1.002); *The Infrastructure Delivery Plan* (SD003) and the *Fylde Coast Retail Study* (ED040).

17. The evidence details engagement with relevant bodies prescribed in Regulation 4 of the Town and Country Planning (Local Plans) (England) Regulations 2012, including Historic England, Environment Agency, Natural England and neighbouring authorities. As regards the latter, there is a *Memorandum of Understanding* (Appendix 2 to SD007) between the four Fylde Coast authorities of Fylde, Blackpool, Wyre and Lancashire County Council. This formalises how these authorities work together on strategic issues and details the governance arrangements.

18. As a result of the joint working, Fylde Borough has formally agreed to accommodate 14ha of land for employment purposes, which is identified as necessary to meet Blackpool's requirements but which cannot be accommodated in Blackpool.

19. Whilst there have been disagreements between the housing market area (HMA) authorities over potential unmet needs, this is a soundness issue which I refer to later within my report under issue 2. I am satisfied that the Council has engaged actively and constructively with Wyre Council in relation to this issue in preparing the Plan.

20. Taking the above into account I conclude overall that the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background

21. A number of representations on the Plan highlight the merits of alternative or omission sites, i.e. those sites that are not allocated within the Plan. However the purpose of the examination is to assess the soundness of the submitted Plan. As such the focus of my report in relation to sites is on whether the site selection process is sound and whether the site allocations will meet the development requirements. My report therefore does not consider the merits of other alternative sites.

Main Issues

22. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 8 main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Whether the spatial strategy has been positively prepared and is soundly based and justified, presenting a clear vision and strategy for the Borough in accordance with national policy.

23. The Plan sets out the vision of where the Council would like Fylde to be at the end of the Plan period in 2032. It presents a clear positive statement for Fylde from which the development strategy and policies within the Plan flow. It is not necessary for the vision to address in detail every part of the Borough or reference every specific issue or opportunity. Changes are not necessary for soundness.

24. Policy S1 identifies the settlement hierarchy and Policy DLF1 sets out the development locations. It identifies the significant constraints to development in Fylde which includes its coastal location, Green Belt, European and national nature conservation sites and other natural and built heritage assets. The spatial strategy is not dependent on development within these areas.

Settlement Hierarchy

25. The settlement hierarchy in Policy S1 has been determined according to the size of population and level of services and facilities within any given settlement. The methodology used for this assessment is set out in the Settlement Hierarchy Background Paper (SHBP) (ED002), along with the results for each settlement.

26. I recognise that the criteria and scoring system used in the Council's methodology are very detailed, but the approach is not unusual or unreasonable. Indeed the Council confirms that the methodology is based on that used for the former North West of England Regional Spatial Strategy. The scoring of the settlements is inevitably a snapshot in time and the SHBP acknowledges that service provision may fluctuate within a settlement which could affect its overall score. However this does not necessarily mean that the settlement hierarchy itself would alter as such changes would need to be

assessed in the context of other settlements within the area. This could have implications for the methodology as a whole which would be a matter for the Council to consider as part of a review of the Plan.

27. It is clear from the settlement hierarchy assessment that Lytham (including Ansdell), St Annes and Kirkham have the highest population levels within the Borough and the largest range of services and community facilities. Their inclusion within Policy S1 as the top tier Key Service Centres is therefore justified.

28. The Local Service Centres serve specific local communities. Two existing centres are identified at Freckleton and Wesham. Warton is identified to have improved services in support of the planned growth within this strategic location. Two new Local Service Centres are identified at Whitehills and Whyndyke to support the significant development planned. The designation of these Local Service Centres is justified.

29. Rural settlements within the hierarchy are split into Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements. The Tier 1 settlements comprise the sustainable communities of Newton, Staining and Wrea Green. Singleton, Weeton, Elswick and Clifton are defined as Tier 2 rural settlements.

30. It has been suggested that some of these rural settlements have been either under or over-scored within the assessment, in particular Wrea Green and Elswick. Queries have been raised about the basis on which services were scored including the level of bus service provision. During the Examination the Council re-visited the scores for these two settlements and produced a Settlement Hierarchy Note dated July 2017 (Annex 3 of EL7.002).

31. In relation to Elswick the Council confirms that the SHBP took account of the bus services that were in operation at the time of the assessment (March 2016) and the resultant score of 2 within the assessment is correct. Indeed the Council's updated note indicates that due to the withdrawal of Lancashire County Council (LCC) subsidies, bus service provision within the settlement has since reduced which results in a lower score of 1 in this regard. However even were this to be applied this would not alter the position of Elswick within the hierarchy as a Tier 2 rural settlement.

32. As regards queries about the score of 0 for school provision for Elswick, I note that the primary school (Great Eccleston Copp C of E school) is located outside and away from the settlement, around 1200 metres from its centre and is accessed in part via a narrow 1 metre wide footway along a busy road with a 40mph speed limit. This does not meet the settlement hierarchy criteria of being within an acceptable walking distance (defined as 800m) and therefore the score in the SHBP is appropriate. Furthermore I note that the total score for Elswick is below that of Singleton and Weeton which are designated as Tier 2 rural settlements so its position within the hierarchy appears reasonable.

33. My attention has been drawn to three recent appeals which have allowed housing within or on the edge of Elswick (EL4.010-EL4.012). Whilst I note the findings of the Inspectors for these appeals, they state that the

settlement hierarchy is a matter for the local plan examination. The Council does not dispute that Elswick is a sustainable settlement, but this is within the context of its position within the hierarchy.

34. Bus provision in Wrea Green at the time of the assessment was also taken fully into account and the score of 1 within the assessment is therefore appropriate. The effects of the subsidy withdrawals since then have resulted in a reduced service, but the Council confirms that this would not affect the score of 1 as applied under the SHBP methodology.

35. Within the SHBP the total score for Wrea Green (21) is higher than Warton (18) which is proposed to be a Local Service Centre. Nevertheless this does not justify designating Wrea Green to the same settlement level, as Warton is clearly identified as a new Local Service Centre to be developed during the Plan period. The assessment is based on the services prevalent in March 2016 and does not take account of the future planned development.

36. Other settlements within Fylde are not defined in the hierarchy and are considered to be within the countryside. The Plan provides some provision for development within the countryside, subject to meeting specific policy criteria as set out in Policies GD2, GD3 and GD4. These policies are discussed later in my report. Nonetheless **MM5** is necessary so that Policy S1 refers to these policies to ensure consistency within the Plan in relation to development within the rural areas. Overall I conclude that, subject to this modification the settlement hierarchy set out in Policy S1 is justified.

Development Strategy

37. The development strategy within the Plan seeks to direct most development towards four Strategic Locations for Development (SLDs) at Lytham and St Annes; Fylde-Blackpool Periphery; Warton; and Kirkham and Wesham. These SLDs are defined within Policy DLF1 and based on the evidence I concur that these are the most sustainable locations within the Borough. Development of the strategic sites at these locations is key to ensuring that the development strategy is achieved.

38. Whilst the overall strategy to focus development within the SLDs is justified, to be positively prepared and effective the policy needs to identify the distribution of housing and employment growth to be met within the SLDs and elsewhere within the Borough. This is currently set out within the supporting text of the Plan. The policy also rather confusingly uses similar terms including strategic locations for development, strategic sites, non-strategic locations and non-strategic development sites, all of which are not clearly defined within the policy or the Plan as a whole.

39. The Council has therefore suggested amendments to the policy and supporting text, to include a revised distribution of development for housing and clarify the terminology used. Against the Council's revised housing requirement of 8,715 for the Plan period, a figure which I discuss later in my report, they propose that 7,845 of dwellings will be developed within the SLDs and 870 in the non-strategic locations to meet this.

40. Amendments to Policy DLF1 and its supporting text should be made as set out in **MM6** and **MM7**. I also recommend the addition of 'around' prior to the dwelling number in **MM6**, to allow a degree of flexibility in line with national policy. I also recommend within these modifications including the distribution of employment development within Policy DLF1. Whilst this was not included within the Council's proposed schedule of main modifications, it accords with the employment land requirement and the supply set out in Policies SL1 to SL5. Accordingly this amendment does not change the substance of what is proposed within the Plan and is a consequential change to ensure there is consistency between policies.

41. Whilst the policy also sets out the housing and employment land requirements to be developed during the Plan period, I discuss the soundness of these figures later in my report.

Conclusion

42. In conclusion, subject to the above main modifications, the spatial strategy has been positively prepared and is soundly based and justified, presenting a clear strategy for the Borough in accordance with the Plan's vision.

Issue 2 – Whether the identified objectively assessed housing need is soundly based, supported by robust and credible evidence and is consistent with national policy

Household projections

43. The objectively assessed housing need (OAN) for the Borough on which the submitted Plan is based (a range of 300–420 dwellings per annum (dpa)) was established through the 2014 *Fylde Coast Strategic Housing Market Assessment* (SHMA) (ED021) and its two addendums (ED022 and ED023).

44. The SHMA provided an assessment of OAN across the three Fylde Coast authorities of Fylde, Wyre and Blackpool. It identified that these three authorities form a single HMA within which are more locally defined markets which broadly equate to the boundaries of each Borough. It used the 2010 based projections, re-based to account for the 2011 Census population data and provided an OAN for the HMA as a whole as well as each Borough.

45. Following the publication of the ONS 2012-based SNPP dataset in 2014, addendum 1 was prepared to consider the implications of the updated projections on the range of needs set out in the SHMA. It did not update the OAN. The second addendum was produced in 2015 following the release of the DCLG 2012-based SNHP. Addendum 2 recommended that the OAN range was updated to reflect a higher upper end of the range of 440 to 450 dpa instead of 420.

46. The Planning Practice Guidance (PPG) indicates that the starting point for the assessment of OAN should be the latest evidence wherever possible. The Government published 2014-based population and household projections in July 2016, which was prior to the submission of the Plan for examination.

47. At my request, the Council considered the implications of these projections for the OAN by commissioning and then consulting on a third addendum to

the SHMA and an update of economic projections as set out in the interim findings section of my report above.

48. The 2014-based SNHP indicates a need for 274 dwellings per annum following the application of a vacancy rate, which is higher than the 2012-based figure of 237 dpa. Based on the evidence that is before me this is a reasonable starting point.

49. The scenarios used within the SHMA addendum assessments include migration-led and employment-led alternatives which have not been significantly challenged and I agree that they are robust.

Demographic need adjustment and market signals

50. The PPG advises that plan-makers may consider sensitivity testing the household projections based on locally specific assumptions and adjust them accordingly.

51. Addendum 3 confirms that the 2014-based household projections include an assumption that household formation rates of younger households (aged 15 to 35) will continue to fall below those seen in 2001. In order to respond positively to address this, there is a need to apply an upward adjustment which assumes a recovery in the household formation rates for younger households to levels seen in 2001. This adjustment results in a minimum demographic need for 351 dwellings per annum in Fylde over the plan period (2011 – 2032). This is some 77 dwellings per annum higher than the 'starting point' projection of the 2014-based SNHP, and represents a 28% upward adjustment. This increase is justified because the evidence indicates that the suppression of younger household formation is at least partially associated with the worsening affordability and historic undersupply of housing in the borough.

52. The PPG also advises local authorities to consider an uplift on the demographic need if there are worsening trends in market signals, including house prices, rents, affordability, rate of development, land prices and overcrowding.

53. Addendum 3 concludes that overall there has been some worsening in market signals, primarily in relation to house prices and affordability, albeit that the impact may be less pronounced than in other comparator areas. Furthermore they are generally at a lower level than the national indicators. On this basis I agree with the report's conclusions that a modest 10% uplift to the adjusted household projection of 351 dpa is a reasonable response. This results in a need for 386 dpa.

Economic growth

54. The PPG highlights the importance of aligning the provision of housing need with future jobs growth. The 2013 SHMA included a series of projections for each authority which were 'employment-led'. For Fylde, these aligned levels of population change, based on a derived labour-force, with a level of job growth taken from a number of sourced economic forecasts. Within the assessments a number of modelling assumptions were applied related to commuting, unemployment and economic activity rates. No-one has

significantly challenged this methodology. The scenarios were carried forward and updated in the SHMA addendums to reflect more recent datasets.

55. The most recent addendum 3 update concludes that the level of future employment growth in Fylde will lie in the range of 55 to 91 jobs per year (about 900 to 1,500 additional jobs) over the remainder of the Plan period (2015 – 2032). Whilst this range is fairly broad it reflects the different assumptions and uncertainties within the economic forecasts and provides for fluctuations in job losses and job gains. Furthermore even at the lower level of 55 new jobs per year this would still be above the historic annual rate of around 40 additional jobs created between 1991 and 2015.

56. It has also been suggested that the OAN should be significantly higher to take account of the designated Enterprise Zones (EZs) at Blackpool airport and Warton aerodrome (which forms part of the Lancashire Enterprise Zone). However, I have not seen definitive evidence of firm plans, timescales and likely jobs numbers to be created at these EZs and therefore an increase in the OAN in respect of the EZs is not justified. Indeed some representors suggest that because of the lack of firm proposals on delivering economic growth and jobs at the EZs, the need for housing in Fylde should be significantly reduced. However the OAN and economic forecasting carried out for the Council do not take account of jobs growth at the enterprise zones and the Plan's economic strategy is not dependent on them coming forward. As such no reduction in the OAN is justified in this regard either. A reasonable approach is to review this matter when more concrete evidence becomes available or at the 5 year review of the Plan, whichever is soonest.

57. I note that there are anticipated job losses within the area, particularly at Warton (BAE Systems). However the timing and exact level of these and any other specific job losses are uncertain. It would therefore be inappropriate to take account of each one-off event within the projections.

58. The resultant uplift to take account of the future jobs growth of 55 to 91 jobs per year over the remainder of the Plan period, when added to the other adjustments, would result in an OAN range of between 410 and 430 dpa. Whilst a higher range was suggested within addendum 2, the latest figures are based on the most up to date analysis and evidence, which for the reasons detailed above I conclude is proportionate and robust.

Affordable housing needs

59. The 2013 SHMA identified a need for 207 affordable homes per annum. This was updated to 249 dpa in the Addendum 1 report.

60. Whilst it has been suggested that the needs identified are too high, this has not been convincingly evidenced in detail. Indeed as the definitions and method for assessing affordable housing needs as used within the SHMA and its addendum follow those set out within the PPG, the resultant need identified is robust.

61. It has also been suggested that an uplift should be applied to the OAN to reflect the need for affordable housing. It is unlikely that the full identified need will be delivered through provisions set out within the Plan. Based on

the Council's proposed affordable housing target of 30% for relevant new residential developments, this would require more than 800 dwellings per annum to be delivered to achieve the affordable housing figure in full. I agree with the Council that this is completely unrealistic, bearing in mind that the OAN is based on a robust assessment of the number of people likely to want or need to live in the Borough and that between 1991 and 2017 the highest number of dwellings constructed was 502 in 1992/93.

62. Moreover, provision against the revised OAN would in itself represent a significant uplift on historic rates of affordable housing completions, noting that in 2015/16 fewer than 40 affordable dwellings were delivered. Providing 410-430 dpa would contribute towards meeting a significant proportion of the affordable housing need identified, providing around 120-130 dwellings per annum.

Conclusion

63. In conclusion, the updated OAN range of 410-430 dpa across the Plan period, is a soundly based figure for the objectively-assessed need for housing in Fylde. It includes a demographic needs adjustment, an uplift for market signals and aligns with the Council's economic strategy. As such this needs to be clearly reflected in the Plan to ensure that it is sound. **MM39** achieves this.

Issue 3 –Whether the identified housing requirement is justified and whether the Plan sets out a positively prepared strategy for the supply and delivery of housing development

Housing requirement

64. The housing requirement within the Plan is set out as a minimum of 7,768 dwellings over the Plan period, as defined in Policies DLF1 and H1. The latter policy also sets out the figure as a minimum annual requirement of 370 dpa. However this requirement reflects the OAN derived from the 2012-based SNPP and SNHP projections. However, taking into account the most up to date 2014-based evidence on OAN a higher housing requirement is necessary for the Plan to be positively prepared.

65. The Council considers that the revised housing requirement should be a minimum of 8,715 dwellings over the Plan period which equates to 415 dpa. Whilst it has been argued that the figure should be higher to reflect the top of the OAN range (430 dpa) this would only be 15 dwellings extra per year which over the 21 years of the Plan would be 315 dwellings. This is only a small proportion of the overall OAN figure, representing a difference of just 3.6% over the Plan period. Furthermore given the different assumptions and inherent uncertainties within the SHMA forecasts it is appropriate to set the housing requirement as a figure that is towards the middle of the range. In this context a difference of 3.6% is not significant.

66. Moreover the Plan clearly indicates that the housing requirement figure is not a ceiling to the delivery of more housing. The figure clearly lies within the defined OAN range. Furthermore it would represent a significant uplift of about 51% from the baseline figure of 274 dpa and around 18% higher than the adjusted demographic need. It would also be almost 50% higher than

the historic rate of housing delivery within Fylde between 2003 and 2016 which was on average around 210 dpa.

67. Overall I conclude that the revised housing requirement figure of 415 dpa is based on robust evidence and would have the effect of significantly boosting the supply of housing in order to meet the needs of the area. It is therefore justified.

68. Therefore to ensure the Plan is positively prepared by reflecting the updated evidence, **MM6, MM38** and **MM39** are necessary so that Policies DLF1 and H1 and the supporting text refer to a minimum housing requirement of 8,715 dwellings (415 dpa). These changes are necessary for soundness.

69. It has also been argued that the housing requirement should be increased in Fylde to take account of unmet housing needs within the Fylde Coast housing market area (HMA), specifically in Wyre. In my interim findings I acknowledged that there was a possibility that Wyre Council may not be able to meet all of its objectively assessed housing need within its own administrative area. However I note that since then the Local Plan for Wyre has been submitted for examination where the assessment of need, the capacity to meet that need and how any potential unmet need would be dealt with will be considered. There is therefore insufficient evidence available at this time to ascertain with any degree of certainty whether there will be an unmet need, its level if there is one and the proportion, if any, that may need to be accommodated in Fylde.

70. Even so, given the importance of meeting housing needs across the HMA, it is necessary for reasons of effectiveness, for the Council to more clearly set out within the Plan how it will deal with this issue, should any unmet needs in neighbouring authorities be identified [**MM1**].

Housing supply (site selection process, site allocations and the housing trajectory)

71. The majority of housing sites identified within the submitted Plan have planning permission, or are sites where the Council, at the time of submission had resolved to grant permission. Nonetheless, all sites have been assessed against a range of deliverability and sustainability criteria through the Strategic Site Assessments 2016 (ED028a to ED028g) and the Site Assessment Background Paper 2016 (ED004).

72. Therefore whilst the planning status of a site or level of developer interest has been an important deliverability factor within these assessments, so too has the consideration of sustainability indicators including its location, accessibility to facilities and services and the presence of any environmental or planning related designations such as Green Belt. The Sustainability Appraisal provides a further assessment of the sites in relation to sustainability objectives and a consideration of the reasonable alternatives. (SD004a-c).

73. Reflecting the fact that most of the housing sites within the Plan have planning permission, discussions at the hearings focussed predominantly on when the sites would deliver housing rather than whether the sites were deliverable per se. On this basis and considering the evidence before me the

Council's housing site selection process is reasonable and proportionate and thus sound.

74. The Plan, as submitted, sets out a housing supply figure of 7,891 homes. This relates to the housing requirement of 7,768 dwellings. The supply figure reflects a base date of 31 March 2016 and includes completions since the start of the Plan period, commitments and allocations. It is clear that this is insufficient to meet the updated housing requirement of 8,715 dwellings identified in paragraphs 65-70 above. In response the Council has confirmed that with the addition of new dwellings completed during 2016/17, new commitments and revised assessments for some existing allocations, the housing land supply increases to 8,819 dwellings (1,538 dwelling completions between 2011 and 2017 and 7,281 dwelling commitments/site allocations). This meets the new housing requirement figure of 8,715 dwellings. As this additional supply includes new completions and commitments it has not been necessary for the Council to seek further sites for allocation.

75. The housing trajectory, in appendix 2 of the Plan includes detailed tables on how each allocated site is proposed to be delivered during the Plan period. Following discussions on the deliverability of individual sites within the hearings the Council agreed to remove site HS6 from the Plan, amend their standardised assumptions on site delivery using evidence provided by site promoters and developers and to update the housing trajectory and the site allocation policies. Having considered the updated evidence this approach is sound.

76. In addition since submission of the Plan a significant number of new sites for residential development within Fylde have been granted planning permission, including several strategic sites which are broadly in accordance with the Plan's overall strategy. The Council has proposed to incorporate these new sites as allocations within the Plan. Having considered the evidence I consider this approach is also sound.

77. Of these new sites, concerns have been raised about the deliverability of site HSS12 'Land north of Freckleton Bypass' for 350 dwellings. This is due to an issue over a condition on the outline permission which requires the delivery of significant highways infrastructure upfront and prior to significant levels of housing being delivered. However I agree with the Council that this issue is not insurmountable. Furthermore the Preston Western Distributor Road has now been approved by LCC and the project is progressing. There is therefore a reasonable prospect of housing being delivered on the site within the Plan period and in accordance with the proposed revised trajectory. The inclusion of the site within Policy SL3 does not make the Plan unsound.

78. In the light of the available evidence and for reasons of soundness the above factors necessitate modifications to the Plan to incorporate the revised housing supply figure [**MM39**], to amend Policies SL1 to SL5 to reflect the updated site evidence [**MM11-MM15**] and to ensure that the policies allocate the sites for development [**MM10**]. I am satisfied that subject to these modifications the allocation of the sites within the Plan is sound.

79. The supporting text to Policy SL5 states that Tier 1: Larger rural settlements could accommodate between 100 and 150 homes over the Plan period and Tier 2: Smaller rural settlements could accommodate up to 50 homes. Following discussions at the hearings the Council agreed that these figures should be 'around' to allow an element of flexibility in line with national policy. **MM16** achieves this.

80. Concerns have been raised that the very detailed housing trajectory set out within the Plan will quickly become out of date as sites are developed. The Council proposes that these delivery tables will be included within their annual Housing Land Supply Statement. This will make it easier for the Council to monitor and manage delivery on an ongoing basis. I concur with this view and recommend that the tables are replaced with a graph for clarity and effectiveness [**MM69**].

81. Whilst the level of supply only provides a small amount of flexibility, the Plan allocates deliverable housing sites to cover the entire housing requirement for the Plan period. As such it does not rely on broad locations for later years and therefore provides a much greater degree of certainty over the deliverability of housing over the Plan period. Some developers during the hearings even implied that some sites may deliver more quickly than anticipated and could be brought forward in the trajectory.

5 year housing land supply

82. At the time of the Plan's submission the Council confirmed that they had a 5 year housing land supply (EL1.001b). However this was based on the 2012-based OAN and housing requirement figure of 370 dpa.

83. In response to the revised housing requirement figure of 415 dpa the Council has updated its 5 year supply of housing land to a base date of 31 March 2017 (EL5.007). This calculates a 4.8 year supply of housing land using the Sedgefield approach for addressing the shortfall in provision since 2011, within the 5 year supply.

84. However in July 2017 following the stage 2 hearings the Council produced a revised version of the 5 year housing supply statement (Annex 2 in EL7.002) to take account of revisions to delivery assumptions as discussed at the hearings. This version still includes the shortfall in housing provision of 952 dwellings (the Sedgefield approach), a 20% buffer because of persistent under-delivery and a small allowance for empty homes. However based on the detailed evaluation within the hearings, the assessment has adjusted the standard build out rates applied to the larger sites and has removed the 10% non-implementation rate for such sites. As the evidence demonstrates that the larger sites are deliverable I see no reason why a discount on their delivery should be applied in the trajectory. There is also no substantive evidence to demonstrate that a higher non-implementation rate would be justified. I find the Council's approach is therefore reasonable and proportionate. Furthermore the inclusion of a small 40 dpa windfall allowance for the latter 2 years of the 5 year period is also justified by the evidence.

85. The revised 5 year housing land supply statement results in a 5.1 year supply on the assumption that past shortfall in delivery will be addressed in the next 5 years (the Sedgefield approach). Whilst this demonstrates that the Council has a 5 year supply I acknowledge that this is finely balanced and provides limited flexibility in housing provision. Whilst a further update with a base date of 30 September 2017 was submitted by the Council prior to the stage 3 hearings showing a higher supply (5.8 years) (in EL9.015), errors in the calculation were corrected in December 2017 to show that the 5 year supply was only marginally better at 5.2 years (EL8.004).

86. The Council's development strategy relies on a number of strategic and other larger sites coming forward within the defined strategic locations. Inevitably large sites will take time to progress and deliver housing, particularly where the provision of infrastructure is necessary. The Council considered whether any other sites could be allocated within the Plan that would not put at risk the development strategy, but concluded that this would mean the delivery of a larger number of smaller sites in different locations or at different proportions to those proposed within the Plan. This would undermine the overall spatial strategy and could put at risk the delivery of some of the larger and more strategic sites and their associated infrastructure.

87. Having regard to the Plan's spatial strategy and the delivery of the larger strategic sites, the use of the Liverpool method for calculating 5 year housing land supply is justified. By allowing for the past shortfall in delivery to be addressed across the remaining Plan period the Council has a 6.4 year supply. This allows sufficient flexibility for housing delivery. Reference to the use of the Liverpool approach in assessing the 5 year housing land supply is therefore necessary in Policy H1 and its supporting text [**MM38** and **MM39**] and the monitoring framework [**MM70**] to ensure the Plan is effective.

Housing density and mix

88. The Plan seeks, through Policy H2 that development will result in a minimum net residential density of 30 dwellings per hectare. Whilst the efficient and effective use of land is to be supported, the requirement is not consistent with Policy GD7 which seeks densities that reflect and where possible enhance local character, so lower densities could also be appropriate. The imposition of the word 'normally' within the policy and amendments to the wording in the supporting text as set out in **MM40** and **MM41** would allow a degree of flexibility so that Policy H2 is consistent with Policy GD7.

89. Policy H2 also seeks a mix of housing types and sizes within developments. Whilst the policy is quite specific on the mix required, it only relates to larger sites of 10 dwellings or more and uses the term 'or' (such as 1, 2 *or* 3 bedroom homes), thereby allowing some flexibility for developers. Nevertheless for reasons of clarity **MM40** is necessary to ensure that the dwelling type and size requirements are updated in accordance with future housing needs assessments so that Policy H2 is effective.

Affordable housing delivery

90. Policy H4 supports the provision of 30% affordable housing across the Borough on sites of 10 dwellings or more, a threshold that is consistent with national policy and the PPG. The viability assessments show that with 30% affordable housing, development would generally be viable. Nevertheless the policy does allow a degree of flexibility when considering viability for individual sites. This is a reasonable approach.

91. Whilst there is a presumption within the policy for affordable housing to be delivered on-site, it does include provision for off-site financial contributions in appropriate circumstances, so long as these are of an equivalent value to providing 30% on-site affordable homes. The policy also allows a degree of flexibility for the Council in determining where such off-site financial contributions are to be spent. Both of these approaches are justified and effective.

92. The Housing and Planning Act 2016 includes a general duty for local authorities to promote the supply of starter homes. Policy H4 includes specific requirements for starter homes. However the relevant parts of the Act have yet to commence. As such **MM42**, which removes the reference to starter homes and simplifies the tenure requirements, is necessary for reasons of clarity. Should the legislation on starter homes be enacted, starter homes could still be delivered under Policy H4.

Gypsies, travellers and travelling showpeople's accommodation

93. The Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update (GTAA Update) (EL1.002) was published in October 2016, which was after the publication version of the Plan was produced. It updates the earlier 2014 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA), in light of the change to the definition of Gypsy, Traveller or Travelling Showpeople for planning purposes, as defined in the revised version of the Planning Policy for Traveller Sites (PPTS) (August 2015).

94. Policy H5, as set out within the submitted Plan is based on the evidence of need within the 2014 GTAA. It supports the provision of 26 extra pitches for gypsies and travellers during the Plan period and allocates two sites providing 5 pitches in total. No plots for travelling showpeople are allocated as no need is identified within the GTAA.

95. The GTAA Update concludes that the need during the Plan period is lower, citing 3 additional pitches for gypsies and travellers and no plots for travelling showpeople. The GTAA Update sets out a clear and robust methodology that reflects the revised PPTS. It has been argued that this level of need is too low, particularly for travelling showpeople, but there is no clear and convincing evidence to support this view. Furthermore the policy provides criteria against which any applications for further pitches or plots will be assessed and where any updated evidence of need can be taken into account. This approach is justified.

96. In response to the GTAA Update evidence and to ensure compliance with national policy, Policy H5 should be amended to reduce the requirement for

additional gypsy and traveller pitches to 3 and delete reference to out of date guidance [**MM43**]. The Council still proposes to allocate the 5 pitches within the policy and this is a sound approach given that these have planning permission and are acceptable. Consequential changes to the supporting text of the policy are also necessary for reasons of clarity and consistency with national policy [**MM44**].

Homes in the countryside

97. The Framework clearly states that isolated homes in the countryside should be avoided unless there are special circumstances such as the criteria listed under paragraph 55. Policy H6 of the Plan provides its own list of criteria which are generally consistent with the Framework's approach. The third criterion in the policy includes two elements; one relating to the use of a heritage asset whilst the second part refers to redundant or disused buildings. For reasons of clarity and to ensure consistency with the Framework criterion 3 should be split into two separate criteria [**MM45**].

98. Policy H7 sets criteria for the replacement of and extensions to existing dwellings in the countryside. This includes limiting the size increase of any replacement dwelling or extension to 33% of the ground floor area of the original house. This figure stems from the existing Fylde Borough Local Plan.

99. It has been suggested that the figure should be more of a guide rather than a specific percentage set out in policy. However this would not provide necessary clarity for decision-makers. Furthermore evidence indicates that development of rural dwellings over the last decade or so has often resulted in much larger properties, reducing the stock of smaller and more affordable homes. The policy does not prevent development and would still allow the reasonable expansion of existing or replacement homes, whilst also ensuring that there remains a range of property sizes within the countryside. The provision is reasonable and proportionate and, thus, sound.

100. Notwithstanding this the policy and supporting text both require some changes to simplify the wording and make it clear how the policy will be applied by decision-makers when considering any future relevant development. **MM46** and **MM47** are therefore necessary for clarification and effectiveness.

Conclusion

101. In conclusion, subject to the above main modifications, the Plan sets out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy.

Issue 4 – Whether the Plan sets out a positively prepared strategy for the delivery of economic development (employment, retail, leisure, culture and tourism development) within Fylde that is justified, effective and consistent with national policy.

Employment land objectively assessed need and requirement

102. EL2.025b(i) contends that the objectively assessed need for employment land during the Plan period is 46.6ha. This is based on evidence of historic annual average take-up of employment land since 1991.

103. The Fylde Employment Land and Premises Study 2012 (ELPS) (ED041a) calculated the average annual take-up between 1991 and 2011 as 2.7ha. This figure was adjusted in 2015 to exclude sui generis development to give a new historic take-up figure of 2.22ha per annum, as summarised in EL5.009. Over the Plan period this equates to 46.6ha.

104. It has been argued that the average annual take-up should be significantly lower to reflect a shorter timescale in order to avoid peaks in delivery during the 1990s. However I note that whilst the longer timescale includes several peaks it also includes years where there was no employment land take-up. There is insufficient evidence before me to demonstrate that using a shorter timescale provides a more realistic assessment than the longer term trend.

105. I recognise that a full review of the ELPS has not been undertaken as recommended within the study and that it is now 6 years old. However it remains the most up to date assessment of employment land for Fylde and no alternative comprehensive assessments of employment need are before me.

106. The Plan sets out an employment land requirement in Policy DLF1 of 60.6ha gross. This is a combination of 46.6ha to meet the objectively assessed needs and an additional 14ha to provide for unmet need within Blackpool, the latter being agreed with Blackpool Council, through the duty to cooperate in 2014.

Employment land allocations and existing sites

107. The Plan allocates sites for 62 ha (net) of additional employment land during the Plan period as set out in Policy EC1. This supply meets the 60.6ha employment land requirement. The sites have been allocated based on the findings of the ELPS and a review carried out by the Council in 2015, the findings of which are set out in Appendix 6 of the Plan. I note that the majority of this supply is located within the Fylde-Blackpool Periphery SLD area.

108. It has been argued that site ES1 is not viable for employment use. Whilst it is in a prominent and strategic location abutting the Queensway Industrial Estate, the site is in close proximity to Blackpool Airport which restricts the design of buildings on it in relation to materials and height. I also note that the site has abnormal ground conditions and associated high construction costs and that it has been marketed for some time with very few reasonable offers.

109. However the delivery of the M55 to Heyhouses link road and development of the large strategic housing allocation (site HSS1) directly opposite the site result in a significant change in circumstances for site ES1, by improving accessibility and making the site more attractive commercially. Whilst the site is close to the Blackpool Airport Enterprise Zone (EZ) the development of the EZ relies on the relocation of existing land uses. Furthermore the benefits of business rate relief at the EZ would be short lived and restricted to specific types of employment use. As such there is little evidence to demonstrate that development at the EZ would directly compete with employment uses for site ES1.

110. In respect of the viability assessment for the site commissioned by the landowners this only relates to one scheme and does not adequately demonstrate the viability of other employment or mixed use schemes coming forward on the site.

111. Taking these factors into account I consider that Site ES1 will be able to support employment development during the Plan period and contribute to the employment land requirement. The allocation is therefore justified.

112. The second part of Policy EC1 identifies existing employment sites and seeks that land and premises in B class uses will be retained, unless there is no reasonable prospect of sites being used for employment purposes.

113. Suggestions have been made that the list of existing sites should be amended to either remove sites which are not viable or include other uses within the defined use classes. However the policy does not in itself allocate existing employment sites and the suggestion that sites be deleted from the list would not remove the fact that the sites would still have an employment use class. Whilst I note that there are other existing uses within some sites, such as the sui generis use at Springfields, the policy seeks only to retain B class uses. Listing other use classes within the policy is therefore not necessary and does not mean that these uses cannot continue. Flexibility for alternatives is provided through Policy EC2 and GD8 to accommodate this where justified.

114. Furthermore the policy itself is in accordance with paragraph 22 of the Framework as it permits the consideration of alternative uses if there is no reasonable prospect of sites being used for employment uses.

115. Overall I consider that Policy EC1 is justified. Nonetheless for reasons of clarity and effectiveness, the policy should be amended so that it is clear that the sites in the first part of the policy are allocated and reference needs to be made to Policy GD8 for consistency [**MM31**]. Also the supporting text should refer to the employment land figure being 'adjusted' to be consistent with the policy [**MM32**]. The position of the EZs also require clarification [**MM33**].

116. The purpose of Policy EC2 is to retain the employment use of current employment sites. However to ensure consistency with paragraph 22 of the Framework **MM34** is necessary.

117. Policies EC3 and EC4 identify the EZs within the Borough and support the delivery of their objectives and purposes as set out by Government. Policy EC4 relates to the Blackpool Airport EZ. A large proportion, though not all, of

the airport site lies within green belt. The policy supports the relocation of operational buildings and facilities closer to the runway which is within the green belt. This appears to support operational airport development in the Green Belt. I recognise that, subject to certain criteria, this could be permitted under the General Permitted Development Order 2015.

118. Notwithstanding any permitted development rights, the Council clarified during the hearings that it was not the intention to generally support development within the Green Belt stating that this would in turn be determined by the masterplan and delivery plan for the site as the EZ is brought forward. **MM35** clarifies this point. This also ensures that the policy is consistent with Policy T3 which relates to the airport.

119. Whilst section b of Policy EC4 includes retail and leisure as potential alternative uses that could enable the development of aviation uses within the site, the policy states that this would be of a limited scale and subject to a number of criteria. Any impact on Blackpool town centre and resort can be taken into account as part of the scheme progression.

Retail needs and provision

120. The assessment of retail capacity (ED040) indicates a relatively modest requirement for additional comparison floorspace within the Borough during the Plan period. It recommends that this is predominantly distributed within the town centres of St Annes, Lytham and Kirkham with small scale provision to be provided elsewhere within the Borough. This would allow for the development of a number of new units to meet the requirements of comparison retailers.

121. The study also identifies a modest 2,825 sqm requirement across the Fylde Coast sub-region (Fylde, Blackpool and Wyre Councils) for additional convenience floorspace over the Plan period. Whilst it does not specify a specific quantitative capacity for Fylde, it does refer to potential qualitative requirements for convenience retail within St Annes town centre, to support its vitality and viability.

122. No other substantive evidence has been provided to demonstrate a different level of retail need and I therefore conclude that the identified retail requirement for Fylde is robust.

123. Policy EC5 which sets out the retail hierarchy within the Borough seeks to maintain and enhance the town, district and local centres. Within the hierarchy two new local centres in Warton and Whitehills are designated to support the level of growth planned for the Warton and Fylde-Blackpool Periphery Strategic Locations for Development. The Council has confirmed that the new local centre in Whyndyke, which is also necessary to support the Fylde-Blackpool Periphery SLD, was, in error, missed off the hierarchy list within the policy. **MM36** corrects this.

124. Policy EC5 does not allocate any sites for retail development within the Plan, nor does it define the boundaries for the proposed local centres at Warton or Whyndyke. Instead the policy supports the delivery of appropriate services within the town, district and local centres to meet locally identified needs, including retail provision.

125. I note that there are some existing shops within Warton and that the criteria-based approach of the policy allows flexibility for the delivery of the centre including its location, as the planned growth develops. This pragmatic approach is justified.

126. The local centre for Whyndyke will be determined through the detailed design of the Whyndyke Garden Village development (site MUS2) which is a reasonable approach.

127. Other centre boundaries together with the primary and secondary shopping frontages, defined on the Policies Map, are appropriate and are justified.

128. The policy confusingly sets out criteria for assessing 'development outside of town centres' and also development 'out of centre'. Whilst the measures are consistent with national policy, for clarity and to ensure the effectiveness of the policy **MM36** is necessary to combine these sub-sections so that it is clear that they apply to development outside of town, district and local centres, not just town centres. I have included a consequential change to the sub-heading within the policy so that it reflects this change.

129. Paragraph 26 of the Framework indicates that a locally set floorspace threshold for impact assessments for out of centre town centre uses may be set, rather than the default national level. The Plan proposes through Policy EC5 a threshold of 750 sqm which is around 30% of the national default level. However this threshold would be larger than most of the convenience and comparison units in the three main towns, the vast majority of which are below 500 sqm.

130. A large proportion of the planned growth within Fylde is within the Fylde-Blackpool Periphery SLD which is in close proximity to Blackpool. It has been suggested that the retail threshold should be higher so that new retail provision within this strategic location can be of a larger size to compete with the retail units within and on the edge of Blackpool. However a higher threshold could undermine the retail performance of the main centres within Fylde. On the basis of the available evidence the threshold is proportionate and justified.

Leisure, culture and tourism

131. Policy EC6 supports and promotes leisure, culture and tourism development within the Borough subject to a number of reasonable measures. It has been suggested that the policy should specifically support large scale rural tourism, not just small scale as referenced. However, no need for this has been demonstrated.

132. Policy EC7 supports the provision of serviced tourism accommodation in defined Holiday Areas in St Annes and the retention of holiday caravan pitches. The Council confirmed at the hearings that the policy should refer to the loss of tourism accommodation uses in the Holiday Areas being resisted, rather than non serviced tourism accommodation. **MM37** rectifies this and is necessary for policy effectiveness.

Conclusion

133. In conclusion, and subject to the above main modifications, the Plan sets out a positively prepared strategy for the delivery of economic development within Fylde that is justified, effective and consistent with national policy.

Issue 5 – Whether the Plan provides a robust framework for the management and delivery of development across the Borough that is justified, effective and consistent with national policy

Onshore oil and gas industry

134. Lancashire County Council (LCC) is the Minerals and Waste Planning Authority in Fylde and has responsibility for setting policies and identifying sites for minerals and waste development for Lancashire. This is set out within the Joint Minerals and Waste Local Plan.

135. The onshore oil and gas industry within the borough is in the exploratory phase. Reference to this is made in the introductory chapter to the Plan. I note that LCC have raised no concerns with the Plan in this regard. Nevertheless the Council acknowledged at the hearings that should a shale gas industry become established within Fylde, its effect would need to be adequately monitored and managed, including taking account of any policy implications for the Local Plan. As such **MM2** amends and updates the supporting text of the Plan to provide further clarification in this regard.

Inclusive design and accessible environments

136. There are a range of policies within the Plan that promote and support inclusive design and accessible environments. They are supportive of the aims of the Framework and most are sound in this regard.

137. Policy GD7 is the overarching policy relating to design and seeks to achieve good design in all development. Whilst it contains a number of general principles for good design it is not clear whether these are policy requirements. In order to ensure its effectiveness as a policy tool for the decision-maker and to provide clarity for users, the general design principles should be referred to as requirements [**MM29**]. Furthermore for reasons of clarity, policy effectiveness and consistency with national policy the addition of a new criterion specifically on inclusive design and accessible environments and amendments to criteria j and k are necessary for soundness [**MM29**]. Criterion v should also be amended to add the term 'where possible' to ensure that the provision of open space is consistent with national policy.

Masterplanning the Strategic Locations for Development

138. Policy M1 seeks that masterplans and design codes are produced for each site allocation within the strategic locations for development (SLDs) referred to in Policies DLF1 and SL1-SL4 to ensure a comprehensive approach to development. However reference to masterplans and design codes within the latter policies is inconsistent with Policies SL1 and SL2 requiring them to

be produced for every development site, whilst SL3 and SL4 only require them for strategic sites.

139. It was agreed during the hearings that Policy M1 should only apply to strategic sites of more than 100 dwellings to ensure that the requirement did not unreasonably apply to the smaller development sites set out within Policies SL1-SL4. I find this to be a reasonable approach and based on the evidence this is justified. I therefore recommend modifications to Policy M1, for reasons of effectiveness, consistency and clarity so that developers and decision-makers are clear as to when the requirements would apply [**MM8** and **MM9**]. Consequential changes to Policies SL1-SL4 [**MM10**] and the justification text to Policy INF1 [**MM53**] are also necessary in this regard to ensure there is consistency with Policy M1.

Settlement boundaries

140. Policy GD1 defines settlement boundaries which are shown on the Policies Map. They can also be defined within Neighbourhood Plans though this is not referenced in the policy. **MM17** amends the policy to make this clear and clarifies the policies to be applied to development proposals whether inside or outside settlement boundaries. These changes are necessary for consistency within the Plan and for effectiveness.

141. At the hearings the Council confirmed that the settlement boundaries have been drawn on the Policies Map so that the development site allocations are within the settlements. To ensure consistency with my recommendations in paragraphs 71-81 to amend the housing site allocations within the Plan, the Council has proposed consequential changes to the settlement boundaries on the Policies Map (EL10.005).

142. One of these changes relates to site HSS12 at Warton which I note has planning permission. The Council has proposed not to include the access road within the settlement boundary but does propose to include it within the site allocation on the Policies Map. It is not necessary for soundness for the access road to be within the settlement. Indeed drawing the boundary along the eastern side of the access road as suggested would have the effect of including undeveloped and unallocated land on the western side of the access road within the settlement. This would not be justified.

143. The proposed Warton settlement boundary excludes the adjacent Warton Aerodrome/Enterprise Zone from the settlement. The site has its own policy designations within the Plan relating to the existing employment land and the Enterprise Zone (Policies EC1 and EC3). As such it is not necessary for soundness for any part of the site to be included within the settlement boundary.

144. No substantive evidence has been submitted to demonstrate the need for any other changes to be made to the settlement boundaries for reasons of soundness. Subject to the changes proposed by the Council to the Policies Map to reflect development within the Plan, I consider the settlement boundaries are justified.

Green Belt

145. No strategic review of the Green Belt has been undertaken when preparing the Plan. The evidence demonstrates that Green Belt land is not needed to deliver the growth proposed within the Plan and therefore this approach is justified.

146. The Council has proposed one change to the Green Belt boundary to remove the southern corner of the large Coastal Dunes site allocation HSS4 from the designation. This is the former Pontins holiday camp which was occupied by significant built development including chalets and leisure facilities including on the corner of the site located in the Green Belt. The site has planning permission for residential development and is currently under construction.

147. The Green Belt boundary in this location does not currently follow any readily recognisable features on the ground and the land does not meet an essential characteristic of Green Belt which is its openness. The amended boundary would follow clear physical features along the site's southern edge which would help ensure its permanency. In this instance I consider that there are exceptional circumstances to justify this Green Belt boundary alteration to the Policies Map.

148. Policy GD2 on Green Belt states that national guidance for development in the Green Belt will be applied. To be consistent with the Framework this should refer to national policy as set out in **MM19**. The supporting text is also not entirely consistent with the Framework and I therefore recommend **MM18** and **MM20**.

Areas of separation

149. Policy GD3 proposes to designate two Areas of Separation within Fylde; one between the settlements of Kirkham and Newton and the other between Wrea Green and Kirkham. The areas have been identified based on criteria set out in the Area of Separation Background Paper November 2014 (ED010). This paper includes an assessment of 12 potential areas.

150. The distance between the settlement boundaries of Kirkham and Newton is around 1013 metres and includes ribbon development on both sides of the A583. This development is generally of a more spacious character than the nearby urban areas with gaps between and beyond the buildings which give glimpses and views of the surrounding countryside. There are narrow undeveloped gaps between the settlements and this ribbon development. On this basis the inclusion of the ribbon development within the area of separation is not unreasonable. Further significant development here would result in both a perceived and actual narrowing of the gap between Kirkham and Newton which would compromise their distinct settlement characters.

151. There is a distance of approximately 313 metres between Wrea Green and Kirkham at the narrowest point. The land between the settlements has an open and predominantly agricultural character. There is significant pressure for development within the area, particularly on the edge of Wrea Green which if allowed would undermine the separate settlement identities and could result in coalescence.

152. Based on the evidence and in accordance with the Council's identified criteria, the designation of these two areas of separation is justified.

153. The purpose of the areas of separation designations is to preserve the character and distinctiveness of individual settlements by preventing coalescence of the settlements. However this is not clear within the policy or supporting text, nor is it clear what development would be appropriate in these areas and how this would be assessed.

154. The Council has put forward suggested modifications to the policy to clarify this including setting out a list of development types that they consider would be appropriate. Whilst I agree that this aids clarity within the policy I note that Policy GD3 within the submitted Plan does not restrict development to this extent. I therefore recommend that the proposed term 'Development is limited to' instead reads as 'Development will normally be limited to' to allow a degree of flexibility to potentially allow other forms of development that would meet the purpose of and function of the areas of separation and not harm the effectiveness of the gaps between settlements. This also ensures that the policy does not restrict development to the same extent as green belt policy which would not be justified or consistent with national policy. **MM21** and **MM22** achieve this.

Development in the countryside

155. Policy GD4 sets out what development would be appropriate within the countryside. For reasons of effectiveness it is necessary to modify the criterion relating to extensions to ensure that it is clear that Policy H7 applies, and include an additional criterion and new supporting text on infill development to ensure consistency with the wording set out in Policy S1 and the Framework [**MM23** and **MM24**].

156. Policy GD5 supports the complete or partial re-development of large developed sites located in the countryside. The policy includes a list of the sites and identifies them on the Policies Map but also states that it is not restricted to these sites. This approach does not provide certainty as to what other sites could be covered by the policy. Furthermore one of the sites listed is located within the Green Belt. The Council confirmed during the hearing sessions that there were no other large developed sites within the countryside. Consequently for reasons of effectiveness, clarity and consistency with national policy **MM25** and **MM26** are required to provide a clear list of designated large developed sites to which the policy applies and to refer to Policy GD2 in relation to the site within the Green Belt.

Mixed use development

157. The Framework supports mixed use development and the Plan includes this provision through Policy GD6. However the policy states that it only applies to strategic sites which would not be consistent with Policy GD5 and no reference is made to residential development within any mix. Modifications **MM27** and **MM28** are therefore required so that mixed use development is supported on other appropriate development sites, not just strategic sites and a reference to residential development is included within the policy. This

provides consistency with other policies within the Plan and ensures the policy is effective.

National technical standards

158. Policy GD7 includes a requirement that new homes comply with all relevant design and quality codes set out in the national technical standards. The Council has confirmed that this means compliance with the mandatory technical standards set out in the Building Regulations, not the optional technical standards. However this is not made explicitly clear in the policy. It is also not the role of planning policy to set out mandatory Building Regulations. As such for clarity and effectiveness **MM29** and **MM30** are necessary to remove this reference from the policy and the supporting text and replace it with wording that supports the provision of high standard living conditions.

159. There is a specific requirement in Policy H2 (and referenced in Policy GD7), for 20% of homes within residential developments of 20 or more dwellings to be designed to accommodate the elderly, including compliance with optional technical standard M4(3A) (wheelchair adaptable).

160. The analysis in the SHMA and the Specialised Housing Background Paper (ED029) identify a high level of growth in the number and proportion of people aged 65 and over during the Plan period and significant growth in the number of people with support needs, including reduced daily mobility. Furthermore, in assessing the existing housing stock the background paper concludes that only 5.3% of homes within the Borough have all four of the 'visitability' features of level access, a flush threshold, sufficiently wide doors and circulation space and a lavatory at entrance level.

161. Whilst I accept that some accommodation specifically built for the elderly has been or is being developed and may continue to come forward during the Plan period, this alone will be insufficient to meet the specific accommodation needs evidenced. I also note that meeting the M4(3A) standard has been factored into the Plan's overall viability assessment and would not make residential development unviable. Furthermore the policy makes it clear that the provision would be subject to viability anyway. Accordingly the requirement set out in Policies H2 and GD7 in this regard is justified.

Demonstrating Viability

162. The Council has suggested a modification to Policy GD8 to change the criteria for demonstrating whether or not an existing use is viable. However, I consider the policy as set out within the submitted Plan is clear, effective and justified and therefore it is not necessary to make any modifications for reasons of soundness.

Conclusion

163. In conclusion, and subject to the above modifications the Plan provides a robust framework for the management and delivery of development across the Borough that is justified, effective and consistent with national policy.

Issue 6 – Whether the Plan sets out a positively prepared strategy for the preservation and enhancement of the environment (natural, built and historic); the management of water and flood risk; and the promotion of renewable and low carbon energy generation within Fylde that is justified, effective and consistent with national policy

164. The purpose of Policy ENV1 is to ensure that new development has regard to its visual impact within its landscape context including the landscape character area in which it is located. It also seeks to protect the open coastal character of the Coastal Change Management Areas. The Plan makes it clear that the requirements of the policy are in addition to design elements set out in Policy GD7. This approach is justified.

165. It has been suggested that criterion r) in Policy GD7 relating to climate change should be removed, but as it only states that development proposals should consider measures in relation to climate change its inclusion is not onerous or unjustified.

166. The Framework requires the protection and enhancement of valued landscapes. Whilst these are not identified within the Plan, the Council sets out within the supporting text to Policy ENV1 its intention to produce a 'Valued Landscapes SPD'. It was suggested during the hearings that because of this Policy ENV1 should include a reference to valued landscapes. I concur with this suggestion though I do not include reference to the Council within the modification as this is unnecessary [**MM64**].

167. However, from the wording in the justification text and discussions at the hearings, it is not entirely clear whether the intended Valued Landscapes SPD would just contain guidance or whether it would identify and allocate the areas. It is not the role of SPD to create policy. However the Council has confirmed that it intends to carry out landscape appraisals to assist in identifying valued landscapes. Therefore I have amended the suggested modification to paragraph 14.6 of the Plan, so that it provides clarity, is consistent with the changes set out in MM66 and accords with the Framework [**MM65**]. Any valued landscape designation could be made as part of the Plan review.

168. The approach to biodiversity as set out in Policy ENV2 is generally justified, though for reasons of effectiveness reference to woodland and ancient and veteran trees needs to be included [**MM66**].

169. The open spaces are defined on the Policies Map and are based on evidence within the Open Space Study Update, published in 2016 (ED059). This is a comprehensive study that provides details on what open space provision exists in the area, its condition, distribution and overall quality. It also considers the demand for provision based upon population distribution, planned growth and its own consultation findings. No other substantive assessment is before me to support the designation of other areas as open space within the borough. Furthermore the Plan contains other designations and policies to protect areas within open countryside. The open space designations set out within the Plan are therefore justified.

170. However the criteria within Policy ENV3 refer only to public open space. Following discussion at the hearings the Council agreed that the policy should be amended to remove reference to 'public' and include the different types of open space within the borough. These changes, along with others to improve the clarity of the policy are set out in **MM67** and are necessary for effectiveness.

171. Policy ENV4 includes setting out standards for the provision of new open space for housing developments of 10 or more dwellings. The requirement for strategic sites (100 dwellings or more) to provide double the standards for smaller development has been assessed for viability and is acceptable. The policy also provides a degree of flexibility in relation to the provision of open space on-site or off-site through the payment of commuted sums. Furthermore the Open Space Study Update 2016 (ED059) identifies that there are specific gaps in the provision of existing open space within areas of the borough. Overall the standards are reasonable and the policy is effective and justified.

172. Policy ENV5 seeks to protect and where appropriate enhance the borough's historic environment. This approach is justified. However modifications to the policy wording are necessary to ensure consistency with the Framework and to aid clarity within the policy [**MM68**].

173. Criterion r in Policy M1 also requires modification to ensure that the references to the significance of heritage assets are consistent with other policies in the Plan and national policy [**MM8**].

174. The Plan supports the government's transition to a low carbon economy and seeks to ensure that development contributes to the mitigation of and adaptation to climate change. Chapter 13 of the Plan includes specific policies on flood risk and water resource management, sustainable drainage, renewable and low carbon energy generation and district heating systems. However it also clearly states that managing climate change is a cross cutting theme that runs through the entire Plan.

175. The provisions of Policies CL1 and CL2 which relate to water management, flooding and sustainable drainage are justified and consistent with national policy. Whilst it has been suggested that Policy CL2 requires developers to provide drainage measures beyond what is necessary for the site, the policy does not read in this way. Whilst it does require that discharge rates are agreed as part of pre-application negotiations this is not unduly unreasonable and may save time and costs during the application process.

176. The Framework specifies that local planning authorities should have a positive strategy to promote energy from renewable and low carbon sources, whilst ensuring that any adverse impacts are adequately addressed. Whilst Policy CL3 provides a list of criteria against which such developments would be determined, it does not read as a policy that proactively supports such development or maximises opportunities for this form of development. The changes set out in **MM61** accord with the approach in the Framework and are necessary for reasons of consistency and effectiveness.

177. Further modifications to Policy CL3 are also required. A change to criteria e is necessary to ensure consistency with national policy on the use of best and

most versatile agricultural land, including in the case of solar farms. Criteria f needs to cross reference to Policy ENV5 to ensure consistency with this policy and the Framework when considering the effect of proposals on the significance of heritage assets. And finally the policy needs modifying to ensure compliance with national policy on Green Belt and the Plan policy on Areas of Separation. These changes are all set out in **MM62**.

178. For reasons of clarity the supporting text should refer to the Written Ministerial Statement on Solar Energy [**MM63**].

Conclusion

179. In conclusion, and subject to the above modifications the Plan sets out a positively prepared strategy for the preservation and enhancement of the environment (natural, built and historic); the management of water and flood risk; and the promotion of renewable and low carbon energy generation within Fylde that is justified, effective and consistent with national policy.

Issue 7 – Whether the Plan sets out a positively prepared strategy for community facilities, infrastructure and transport provision to meet the Plan's development strategy and is justified, effective and consistent with national policy

Community Facilities

180. The objective of Policy HW1 is to seek to address health and well-being issues by supporting the integration of public health principles with planning. It proposes to do this through supporting the provision of health care facilities, promoting improvements to healthy lifestyles and requiring health impact assessments (HIA) on strategic sites. For consistency with other policies within the Plan, particularly Policy M1, the policy should clearly state that HIA is required for strategic sites that do not have full planning permission [**MM48**].

181. It has been suggested that the need for HIA should specifically refer to shale gas exploration and development. Notwithstanding what LCC propose to put into their Minerals and Waste Local Plan in this regard and as referred to earlier in my report, **MM2** will ensure that the Council consider the effects of the industry, should it develop.

182. Policy HW2 supports the provision of new community facilities to meet the needs of the community, including in the proposed new local centres. However whilst the new centres at Warton and Whitehills are listed within the policy, Whyndyke is not. **MM49** is therefore necessary to correct this.

183. The policy also reserves a site at Mowbreck Lane in Wesham for the relocation of the Medlar with Wesham Church of England Primary School. However updated evidence from the Local Education Authority indicates that this is not justified. It is therefore necessary to remove this requirement from the Plan and for clarity include the new primary schools to be provided within development sites HSS1 Queensway and MUS2 Whyndyke [**MM49**]. This also requires consequential changes to paragraph 12.6 of the Plan to ensure it is consistent with regard to primary school provision [**MM52**]. The

precise wording of this modification has been amended from that consulted upon, to ensure the Plan is internally consistent.

184. Whilst the Council accepts that there may be a need for a new secondary school within Fylde during the Plan period, no substantive evidence at this time has been provided to demonstrate what level of requirement may be needed or identify where it may be required. As such no site is allocated within the Plan which, based on the available evidence, is a reasonable and justified approach. Nevertheless additional wording within Policy HW2 to support the provision, should a need be identified, would aid clarity on this matter [**MM49**]. This also requires consequential changes to paragraph 12.6 of the Plan to ensure it is consistent in this regard [**MM52**]. As such the precise wording of this modification has been amended from that consulted upon, to ensure the Plan is internally consistent.

185. Paragraph 11.28 of the Plan states that there is a shortfall of burial and crematoria facilities in Fylde. The Council confirmed at the hearings that this is incorrect and that the existing facilities are sufficient for the Plan period. To ensure that the Plan is justified **MM50** requires the deletion of this paragraph.

186. Policy HW3 protects existing indoor and outdoor sports facilities and supports the provision of new facilities subject to meeting relevant criteria. It allows flexibility to improve and relocate facilities to meet local needs across the borough. This approach in principle is justified. Nonetheless **MM51** is necessary to ensure that the policy is clear on whether development would be allowed if only one criterion applied or several.

187. Whilst the policy includes reference to specific needs assessment documents, these are not dated and therefore they could relate to updated versions produced for the Council during the lifetime of the Plan. As such deletion of these is not necessary for soundness.

Infrastructure and service provision

188. Policy INF1 in chapter 12 of the Plan seeks to support development proposals that provide essential site services and deliver infrastructure requirements set out in the Council's Infrastructure Delivery Plan. I consider this policy is sound.

189. Policy INF2 seeks developer contributions from relevant development, subject to viability. Whilst the policy is, in principle, justified, criterion f should include Whyndyke as a new local centre [**MM54**].

Transport

190. The objective of Policy T1 is to safeguard three strategic highway improvement routes from other development.

191. The first route listed is the M55 to Heyhouses (St Annes) link road which proposes to provide a direct route between junction 4 of the M55 motorway and St. Annes. The route has planning permission and its inclusion within the Plan is sound.

192. As regards the second route, the M55 to Fleetwood Corridor Improvements, (part of the M55 to Norcross link or 'Blue route' as it is commonly referred to), there was discussion at the hearings about whether the area to be safeguarded is appropriate or should be reduced. Whilst I note the concerns about the deliverability of this route, the scheme is defined within the Fylde Coast Highways and Transport Masterplan (ED084) and remains an aspiration of Fylde, Wyre, Blackpool and Lancashire Councils to resolve significant highways issues within the locality. Based on the submitted evidence the inclusion of the route within Policy T1 is justified.

193. As regards the third route, the A585 Skippool to Windy Harbour Improvements, I acknowledge that Highways England have identified a preferred route following consultation, but as this does not yet have planning permission and is therefore not set in stone, it would not be appropriate at this stage to identify this precise route in the Plan. As such the safeguarding of the area within the Plan for these route improvements is justified.

194. Nonetheless for clarity the supporting text relating to Policy T1 should cross reference to Policy ENV5 on the historic environment as it does on other policies [**MM55**]. The addition of a reference to the need for improvements relating to Junction 4 of the M55 within the Plan's strategic objectives is also necessary for clarity [**MM3**].

195. Policy T2 seeks to severely restrict development within the defined safeguarded area at Warton Aerodrome. Neither the policy nor the supporting text provides clarity as to what is meant by the 'defined safeguarded area', nor does it explain why limited extensions to existing properties would be acceptable, but other development would not in this area.

196. During the hearings a form of modified wording for the policy and supporting text was suggested and agreed between the Council and the aerodrome operator BAE Systems. This defines the legislation relating to safeguarded areas and the need to ensure built development is restricted within the zone and the wider area, unless no adverse impacts on aviation operations or defence navigation systems and communications can be robustly demonstrated. **MM56** and **MM57** are therefore necessary for the effectiveness of the policy and therefore soundness.

197. Policy T3 relates to Blackpool airport. For reasons of clarity on safeguarded areas and to ensure consistency with Policy EC4 in respect of the green belt **MM58** and **MM59** are recommended.

198. Policy T4 seeks to enhance sustainable transport choice. In relation to Transport Assessments or Transport Statements additional text to ensure that any necessary mitigation is secured and implemented in accordance with the requirements of the Highway Authority would ensure clarity of the policy. **MM60** is therefore recommended.

Conclusion

199. In conclusion, and subject to the above modifications the Plan sets out a positively prepared strategy for community facilities, infrastructure and

transport provision to meet the Plan's development strategy and is justified, effective and consistent with national policy.

Issue 8 – Whether the Plan is deliverable and capable of being effectively monitored

200. Appendix 8 of the Plan sets out a performance monitoring framework, the purpose of which is to monitor the delivery of policies within the plan.

201. It has been suggested that the amendments put forward by the Council to some of the indicators, targets and supporting text are not consistent with the revised 2018 Framework. As set out in my introduction, for the purposes of examining plans submitted on or before 24 January 2019 the revised NPPF sets out transitional arrangements stating that the policies in the previous Framework will apply and that a plan review or a new plan is the way to reflect policy changes. I therefore consider that a review is the correct mechanism for ensuring that a plan is fully in line with the revised NPPF. Furthermore the Council will in any case have to take account of revised monitoring measures, including the Housing Delivery Test which is now a national requirement.

202. I consider that an amendment to the monitoring framework is necessary to ensure that the indicators are consistent with other modifications within the Plan, set appropriate triggers and add contingencies for the Council to action should the policies not deliver the required outcomes. **MM70** is therefore necessary for reasons of clarity and to ensure effective monitoring.

Issue 9 - Other matters

203. The inclusion of a policy within the Plan setting out the Framework's presumption in favour of sustainable development is not necessary for soundness. Indeed the Framework states that national policy should not be repeated in development plans. I therefore concur with the Council's suggestion that Policy NP1 and chapter 5 as a whole should be deleted from the Plan for reasons of soundness and, thus, recommend **MM4**.

204. The plan contains a glossary of main terms used in the Plan. Whilst this is a useful addition that assists the reading of the Plan, particularly by non-planning specialists, it does not in itself affect soundness. Therefore, as the inclusion of the changes set out under MM71 in the Council's proposed schedule of main modifications is at their discretion, it is not necessary for me to recommend it for soundness.

205. Throughout the examination, I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the course of the examination including meeting the needs of gypsies, travellers and travelling showpeople and for accessible and adaptable housing and inclusive design and accessible environments.

Assessment of Legal Compliance

206. My examination of the legal compliance of the Plan is summarised below.

207. The Plan has been prepared in accordance with the Council's Local Development Scheme (BD094).

208. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement (BD093).

209. Sustainability Appraisal has been carried out and is adequate (SD004a and SD004b).

210. On the 12 April 2018, the Court of Justice of the European Union (CJEU) issued a judgement (People over Wind & Sweetman v Coillte Teoranta Case C-323/17) which ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures (referred to in the judgement as measures which are intended to avoid or reduce effects) should be assessed within the framework of an appropriate assessment and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the Plan or project on a European site at the screening stage.

211. Consequently, in the light of this judgement, I asked the Council, in a letter dated 11 May 2018 (EL11.002a) to consider the extent to which their Habitats Regulations Assessment documents are legally compliant. The Council commissioned a further HRA report to supersede the previous HRA Screening Report (May 2017) and Modifications Addendum (April 2018). This new HRA report (EL11.003a) was published in June 2018 and was made available for consultation during late June and July 2018.

212. As part of the consultation Natural England raised some further concerns. Subsequent Appropriate Assessment set out in the July 2018 HRA (EL11.004b) show that there would be no adverse effects on the integrity of the European sites identified within the report, either alone or in-combination with other plans or projects. Natural England state that they raise no objections to this latest version of the HRA.

213. The Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change, as referred to earlier in my report under issue 6.

214. The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

215. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

216. The Council has requested that I recommend main modifications (MMs) to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Fylde Council Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Y Wright

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

MM1	5	1.24 and 1.26-1.28	1.24 .....For Wyre Council this gave an ~~objectively assessed need~~ OAN of between 400 and 479 dwellings per annum from 2011 to 2031..... 1.26 ~~The~~ Wyre Council's evidence base in relation to these issues ~~is~~ remains incomplete and the exact extent of ~~the~~ their unmet need is unknown as the precise numbers of homes that will need to be delivered outside Wyre Council's administrative area has not yet been assessed. It is also unclear what provision, if any, other neighbouring authorities will be able to make. The difficulty has arisen because of timing: the production of plans has not been aligned. 1.27 ~~Fylde Council are aware of this important issue, however at this stage the precise numbers of homes that will need to be delivered outside Wyre Council's administrative area has not been assessed.~~ Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively-assessed need for housing. Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed. Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development. ~~1.28 It is crucial that Fylde's Plan is not delayed, an up to date plan must be adopted as soon as possible. However, in accordance with the Duty to Cooperate, Fylde Council is committed to continuing to work with Wyre and its other neighbours, once the evidence base relating to Wyre's constraints is complete, in order to address the above mentioned issues.~~
MM2	13	1.53	~~In June 2014, LCC, along with Blackburn with Darwen Borough Council and Blackpool Council, consulted Fylde Council on a proposal to produce a Supplementary Planning Document (SPD) on onshore oil and gas exploration, appraisal and production. Fylde Council submitted comments on the scope of the document in summer 2014. The draft SPD was produced after this scoping consultation, informed by the~~

			~~comments received. There was an eight week consultation on the draft Onshore Oil and Gas Exploration, Production and Distribution SPD, which ended on 2 March 2015. Once again, Fylde Council submitted comments to LCC on the draft SPD. LCC published an updated draft SPD in November 2015.~~ Lancashire County Council continue to work on a Minerals and Waste Local Plan for Lancashire which will include Onshore Oil and Gas Exploration, Production and Distribution. The industry is still in the exploration phase. If a shale gas production industry is developed in Fylde, the Council acknowledges it will need to consider the scale and rate of shale gas development and review any cumulative impacts.
MM3	31	SO3	*Additional bullet point:* g. Seek to resolve congestion and capacity issues on M55 Junction 4 exacerbated by development over the Local Plan period.
MM4	33	Chapter 5 (NP1 and 5.1-5.5)	*Delete chapter and renumber subsequent chapters*
MM5	37	S1	Within the rural areas, development will be restricted to the Tier 1: and Tier 2: Larger and Smaller Rural Settlements, ~~except where development involves a like-for-like re-development of an existing property, the appropriate re-use of an existing building or minor infill development~~ except where development is allowed by Policy GD2, GD3 or GD4 as applicable.
MM6	40	DLF1	The Local Plan will ~~deliver~~ provide sites for a minimum of ~~7,768~~ 8,715 new homes ~~along with~~ and a minimum of 60.6 Ha (gross requirement) of additional employment ~~use~~ land over the plan period to 31 March 2032. **Locations for Development** **Strategic Locations for Development** ~~Four Strategic Locations for Development form the basis for the Local Plan Development Strategy.~~ The Local Plan Development Strategy is to direct the majority of future growth to the most sustainable locations, specifically to the four Strategic Locations for Development. The four Strategic Locations are: • Lytham and St Annes; • Fylde-Blackpool Periphery; • Warton; and • Kirkham and Wesham. Development of the ~~strategic~~ Strategic ~~sites~~ Sites at these Strategic ~~locations~~ Locations ~~are~~ is key to ensuring that the

			Development Strategy is achieved. **Non-strategic ~~locations~~ Locations for Development** ~~Non-strategic development sites (amounting to between 10 and 99 homes) are situated within the four Strategic Locations for Development. Non-strategic development sites also occur within and on the edge of the Tier 1: Larger Rural Settlement at Newton and the Tier 2: Smaller Rural Settlements at Clifton and Elswick.~~ Other development will mainly be located in the Non-strategic Locations for Development, which comprise the Local Service Centre of Freckleton, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements. **Broad Distribution of Development** **Strategic Locations** Around 7845 homes, representing 90% of homes to be developed in the plan period (including small sites) and 59.6 ha of employment land will be located in the four Strategic Locations for development. **Non-strategic Locations** Around 870 homes, representing 10% of homes to be developed in the plan period (including small sites) and 2.4 ha of employment land will be located in the Non-strategic Locations. **Windfalls ~~and small sites allowances~~ (including small committed sites)** ~~Windfalls and non-strategic sites will occur within the Strategic Locations for Development. An allowance should be made for non-strategic sites within the Strategic Locations for Development and within and adjacent to Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements.~~ 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 in years 10 to 21 of the plan. The delivery of small sites that are already committed is included within the Housing Trajectory (Appendix 2): this provides for the delivery of small sites up to year 10 of the plan. Small committed sites and windfalls yet to come will provide around 1040 homes within the plan period (11% of the housing requirement). There may also be some larger windfall sites that will also contribute to this figure.
MM7	41	6.21-6.22	*Amend paragraph 6.21 as follows:* **~~Broad Distribution of Development~~**

			~~**Table 2** shows the distribution of development planned for Fylde to the end of the plan period, in 2032, including the four Strategic Locations for Development; and development that will occur in **Tier 1: Larger Rural Settlements** and **Tier 2: Smaller Rural Settlements** is included in the Non-Strategic Locations for Development. An allowance has been made for non-allocated sites of less than 10 homes and a windfall allowance.~~ The allocated sites are set out in Policies SL1 to SL5. The Housing Trajectory (Appendix 2) shows how the sites will be delivered over the plan period. Chapter 8 provides the justification for the overall amount of employment land provided for through Policy DLF1 and Chapter 9 provides the justification for the overall level of housing provision within the policy. *Delete Table 2 in the plan.* *Amend paragraph 6.22 and add an additional paragraph as follows:* Performance Monitoring Indicator 4, in Appendix 8, sets out a target / policy outcome to achieve the following cumulative home completions from 1st April 2011 to the end of the plan period: ~~Lytham and St Annes Strategic Location: 23.3%; Fylde-Blackpool Periphery Strategic Location: 29.3%; Warton Strategic Location: 10.6%; Kirkham and Wesham Strategic Location: 14.5%~~Strategic Locations for Development: 90%; Non-Strategic Locations for Development: ~~9.7%~~ 10%~~; and Allowances and unallocated sites: 12.6%~~. **Development Sites** Strategic development sites (amounting to 100 or more homes) are set out in Policies SL1 to SL5, prefixed by the letters HSS (for housing) or MUS (for mixed-use). Non-strategic housing sites (amounting to between 10 and 99 homes) are set out in Policies SL1 to SL5, prefixed by the letters HS. Small housing sites (amounting to between 1 and 9 homes) are not allocated within the plan.
MM8	44	M1	Unless a Masterplan or design code has already been prepared by the council, prospective developers of Strategic Sites (100 or more homes) within the Strategic Locations for Development named in policy **DLF1** will be expected to prepare a masterplan or design code for their site in consultation with the council. This should be carried out as part of the pre-application consultation process set out in the Statement of Community Involvement.~~, Masterplans and design codes will be prepared by the prospective developers, with the approval of the Council for each allocation site Strategic Site (100 or more homes) within the Strategic~~

			~~Locations for Development named in policy **DLF1**.~~ r) Where it is considered that proposals ~~are likely to~~ may have a harmful impact upon the significance of a heritage asset, ~~mitigation measures should be agreed with the Council. However, some harm cannot be mitigated, and without the public benefits, means that the site may be considered inappropriate for development.~~ the proposal should be considered in relation to the provisions of Policy ENV5.
MM9	44	7.6	Where sites require a masterplan as part of the policy or justification, in order to achieve the comprehensive development of a Strategic Development Location, ~~it is expected that~~ the masterplan ~~will~~ should be prepared by the prospective applicants of the site in consultation with the Council, in advance of the submission of any planning application. ~~It is the Council's intention that~~ Tthe draft masterplan should be the subject of consultation with all stakeholders and interested parties, including the wider community. The masterplan shall be agreed with the Council and thereafter be adopted for the purposes of development management as a development brief in the determination of subsequent planning applications. Where no masterplan has been agreed with the Council in advance, the applicant will be required to prepare a masterplan as part of the Design and Access Statement for the application; the Design and Access Statement including the proposed masterplan will then be required to be subject to pre-application consultation in accordance with national guidance.
MM10	47-52	SL1-4	~~Proposals for development of the~~ The following strategic and non-strategic sites identified on the Policies Map accompanying this plan ~~will be supported~~ are allocated for development ~~as follows~~: Masterplans and approved design codes for each Strategic Ssite (100 or more homes) listed above …
MM11	47	SL1	*Amendments to the table as follows:* HSS1 Queensway ~~930~~ 992 HSS3 Lytham Quays ~~120~~ 119 HS1 Queen Mary School ~~41~~ 35 HS3 Ashton Nurseries ~~10~~ 12 ~~HS6 68 North Promenade & 1 Sandgate St Annes 12 0.0Ha 2016/17~~ (site deleted altogether) HS10 34-36 Orchard Road ~~14~~ 12 HS14 AXA Lytham ~~45~~ 65 *Projected commencement dates of all sites to be corrected to conform with dates shown in the trajectory in EL9.015 pages*

			45-48 *Additional sites:* HS58 Westmoreland House 25 0.0Ha 2017-18 HS59 Land to east of Sefton Road 12 0.0Ha Commenced 2017 HS60 Valentine Kennels 53 0.0Ha 2018-19 HS61 Roseacre, Wildings Lane 45 0.0Ha 2018-19 HS62 Keenans Mill 26 0.0Ha Commenced 2017 HS67 St. Leonards Bridge Garage 38 0.0Ha 2019-20 HS68 Church Road Methodist Church 10 0.0Ha 2018-19
MM12	49	SL2	*Amendments to the table as follows:* HSS4 Coastal Dunes ~~351~~ 429 MUS1 Cropper Road East, Whitehills ~~451~~ 529 5.7Ha Commenced 2016~~-17~~ MUS2 Whyndyke Farm ~~810~~ 630 HSS5 Cropper Road West ~~442~~ 250 HS21 Land to the rear of 11-63 Westgate Road ~~70~~ 25 *Projected commencement dates of all sites to be corrected to conform with dates shown in the trajectory in EL9.015 pages 45-48*
MM13	51	SL3	*Additional sites:* HSS12 Land north of Freckleton Bypass 350 0.0Ha 2020-21 HSS13 Clifton House Farm 115 0.0Ha 2020-21 *Projected commencement dates of all sites to be corrected to conform with dates shown in the trajectory in EL9.015 pages 45-48*
MM14	52	SL4	*Amendments to the table as follows:* HSS8 The Pastures ~~262~~ 264 HS28 Sunnybank Mill ~~31~~ 52 *Projected commencement dates of all sites to be corrected to conform with dates shown in the trajectory in EL9.015 pages 45-48* *Additional sites:* HS57 Brook Farm Dowbridge 170 0.0Ha 2018-19 HS63 Campbells Caravans 30 0.0Ha 2019-20

MM15	53	SL5	*Amendments to the table as follows:* HS52 Cobweb Barn Newton ~~29~~ 40 HSS11 Land off Willow Drive Wrea Green ~~100~~ 86 HS45 Rear of 54 Bryning Lane Wrea Green ~~25~~ 36 HS37 The Refuge, Ruskin Road, Freckleton ~~13~~ 11 HS56 Sunnydale Nurseries, Garstang Road, Little Eccleston ~~25~~ 41 HS47 Land North of North View Farm Wrea Green ~~minded to approve~~ allocation ~~Elswick 50 Neighbourhood Development Plan Allocation 2017-18~~ *Projected commencement dates of all sites to be corrected to conform with dates shown in the trajectory in EL9.015 pages 45-48* *Additional sites:* HS64 Land West of Church Road Weeton 25 0.0Ha 2019-20 HS66 Quernmore Trading Estate Freckleton 10..0.0Ha 2021-22 HS69 Naze Court, Naze Lane, Freckleton 12 (minus 10 net of demolitions) 0.0Ha 2019-20 HS70 Land West of Woodlands Close, Newton 50 0.0 Ha 2018-19 HS71 North of High Gate and East of Copp Lane, Elswick 24 0.0Ha 2020-21 HS72 Land North of Mill Lane, Elswick 50 0.0Ha 2019-20 HS73 Land North of Beech Road, Elswick 50 0.0Ha 2018-19
MM16	55	7.21	The Background Paper includes Tier 1: Larger Rural Settlements, which the Council considers could accommodate ~~between~~ around 100 ~~and~~/ 150 homes over the plan period; and Tier 2: Smaller Rural Settlements which could accommodate ~~up to~~ around 50 homes over the plan period.
MM17	56	GD1	The boundaries of settlements in Fylde are shown on the Policies Map and in Neighbourhood Development Plans where these have been made. ~~Development will be focussed on previously developed land within and immediately abutting the existing settlements subject to other relevant Local Plan policies being satisfied.~~ Development proposals on sites within settlement boundaries will be assessed against all relevant Local Plan policies. Development proposals outside settlement boundaries will be

			in accordance with Policies GD2, GD3, GD4 and/or GD5 as applicable. ~~Development proposals on greenfield sites within or immediately abutting the existing settlements' boundaries will be assessed against all relevant Local Plan policies , including but not limited to, policies on the settlements' development targets, infrastructure, open and recreational space , the historic environment, nature conservation, mineral safeguarding, flood risk, as well as any land designations or allocations.~~ ~~The significant loss of the best and most versatile agricultural land will be resisted unless it is necessary to deliver development allocated in the Local Plan, or for strategic infrastructure.~~
MM18	57	8.4	All land outside settlement boundaries in Fylde is within either the ~~countryside.~~ t~~T~~he Green Belt ~~and~~ or the Areas of Separation or the Countryside. ~~designation washes over parts of the countryside designation.~~
MM19	58	GD2	The Green Belt within Fylde is shown on the Policies Map. Within that area national ~~guidance~~ policy for development in the Green Belt will be applied.
MM20	58	8.6-8.7	*Amend paragraph 8.6:* No strategic review of the Green Belt within Fylde ~~will be~~ has been undertaken when preparing the Local Plan.~~, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies.~~ *Amend paragraph 8.7 as follows:* Inappropriate development in the Green Belt should not be approved ~~will be resisted~~ unless there are very special circumstances. ~~Paragraphs 87 – 91 of the~~ The Framework sets out the types of development that are considered to be exceptions to inappropriate development and those forms of development that are not inappropriate provided they preserve the openness of, and do not conflict with the purposes of including land within, the Green Belt. ~~these very special circumstances and~~ Policy **ENV3**, ~~relating to the Green Infrastructure network~~ Protecting Existing Open Space (Part of the Green Infrastructure network), sets out the positive community benefits the Green Belt can provide in terms of landscape, amenity and open space. ~~Minor changes will be made to the Green Belt boundary at the Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor (site **HSS4**).~~

MM21	59	GD3	~~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.~~ ~~Areas of Separation identified on the Policies Map are designated to avoid coalescence and to main the character and distinctiveness of the following settlements:~~ 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 effectiveness of the gap ~~openness of the land~~ 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. ~~Extensions to existing homes will be permissible within the Area of Separation. No new homes will be permitted within the curtilage of existing homes in the Area of Separation.~~ Development will normally be limited to: a) that needed for purposes of agriculture, horticulture or forestry; or other uses appropriate to a rural area, including uses which would help to diversify the rural economy, of a type and scale which would not harm the effectiveness of the gap between the settlements in protecting the identity and distinctiveness of settlements; b) the re-use or rehabilitation of existing permanent and substantial buildings; c) extensions to existing dwellings and other buildings in accordance with Policy H7; d) 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 the settlements in protecting the identity and distinctiveness of settlements; e) isolated new homes in the countryside which meet the criteria set out in Policy H6. f) minor infill development, of a scale and use that does not have a material impact on the rural character of the area and does not conflict with the provisions of policy ENV3, providing that it would not result in any harm to the effectiveness of the gap between the settlements or compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements. Development that is needed for uses appropriate to a rural

			area situated within the Area of Separation should be sited carefully to avoid harm to the effectiveness of the gap between the settlements in protecting the identity and distinctiveness of 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, enhance and restore biodiversity and geodiversity value will be encouraged.~~
MM22	59	8.9-8.10	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 prepared a background paper on Areas of Separation in 2014, which included the following criteria to assess potential Areas of Separation:~~ 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 Council produced the Area of Separation Background Paper (2014) which assessed potential Areas of Separation using the following criteria: • Distance between settlements or built-up areas (at narrowest point); • Current land use; • Landscape character; • Topography; • Development pressure; • Planning application history; • Local Plan designation; and • Other relevant designations. 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 measuring 1,023 metres 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 will~~

			~~apply to all forms of development in these two areas.~~ *Add additional paragraph following 8.10:* 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, enhance and restore biodiversity and geodiversity value will be encouraged.
MM23	60	GD4	c) ~~minor~~ extensions to existing ~~homes~~ dwellings and other buildings in accordance with Policy H7; *Additional criterion:* f. minor infill development
MM24	60	8.13	~~Minor extensions~~ Extensions to existing homes and other non-residential buildings are also acceptable in principle, providing they do not prejudice the character of the countryside and are appropriately designed. Minor infill development will be of a scale and use that does not have a material impact on the rural character of the area and does not conflict with the provisions of policy ENV3.
MM25	61	GD5	**Large Developed Sites in the Countryside and Green Belt** The large developed sites in the countryside are listed below and are identified on the Policies Map: ~~The complete or partial re-development of large developed sites in the countryside, including but not restricted to the~~ • Universal Products Factory at Greenhalgh; • Helical Technologies Ltd at Hillock Lane, Warton; • ~~the~~ Westinghouse~~r~~ Springfields in Salwick; • ~~the~~ Naze Lane Industrial Estate at Freckleton; • Weeton Barracks Camp; • ~~HM Prison Kirkham~~; • Mill Farm Sports Village, Fleetwood Road, Wesham; and • Ribby Hall Holiday Village~~, all of which are identified on the Policies Map, will be permitted subject to the following criteria:~~ The complete or partial redevelopment of these large developed sites in the countryside will be permitted subject to the following criteria: a) The proposal would not result in harm to the character,

			appearance or nature conservation value land in the countryside, ~~Areas of Separation,~~ landscape setting~~,~~ or historic environment ~~or Green Belt~~ in comparison with the existing development, in terms of footprint, massing and height of buildings; ..... f) Mixed use development is promoted on all of these sites. ~~It is not intended that this policy should relate to the re-development of redundant farms or holiday caravan sites or parks~~ Her Majesty's Prison Kirkham, which is situated within the Green Belt, is also identified as a large developed site on the Policies Map. Any development of or at this site will be required to be in accordance with the provisions of Policy GD2.
MM26	61	8.15	It is important that re-development of existing or redundant large developed sites respects the character of land in the countryside or Green Belt land ~~or Areas of Separation~~ in which they are situated or adjacent to..... Policy GD5 relates only to the specific sites listed in the policy. Redevelopment of other sites within the Countryside, Green Belt or Areas of Separation, such as redundant farms or holiday caravan sites or parks, will be assessed against Policy GD2, GD3 or GD4 as applicable, and any other relevant policies of the plan.
MM27	62	GD6	Mixed use development will be encouraged, particularly on strategic sites~~, in order to provide~~. The mix of uses could include local retail centres, ~~and access to~~ employment, commercial, leisure, community and recreational ~~opportunities close to where people live and work~~ uses as well as residential. ~~New businesses will be encouraged to locate within settlements and on redeveloped sites. Community facilities should be multi-functional – this could include areas for skills training programmes. Local businesses should be encouraged to provide training or apprenticeships to local people.~~ The element of mixed use development will depend on the particular site and the character of the surrounding area. Providing it does not undermine housing delivery, ~~Mixed~~ mixed use development will be promoted where the following apply: a. Within ~~An~~ an area ~~within which~~ where the scale and character of uses is such that no single land use predominates. Residential, retailing, business, health, community, educational facilities, recreation, sport, open space and industrial uses may all be represented;~~.~~ b. Where residential and commercial uses can be integrated within the same unit, creating flexible working practices and live / work units, or opportunities for home

			working; or. c. On Strategic Development Sites MUS1, MUS2, MUS3 and MUS4, and on other Strategic Development Sites where appropriate. ~~c. Mixed use development would be supported providing it does not undermine housing delivery.~~
MM28	63	8.19	The Framework provides clear guidance in support of mixed use development ~~in paragraphs 17, 21, 37 and 38~~. Locally, ... Therefore, it is intended that all development ~~within the categories set out~~ on sites where any of criteria a. to c. in Policy **GD6** apply should include an element of mixed use. The Framework contains a particular recommendation for live / work.
MM29	65	GD7	*Amend, add a new criterion and correct the identification of the remaining criteria accordingly:* Development will be expected to be of a high standard of design, taking account of the character and appearance of the local area, including the following requirements: a. In order to promote community cohesion and inclusivity, new development will be expected to deliver mixed uses, strong neighbourhood centres and active street frontages which bring together all those who live, work and play in the vicinity. j. Ensuring the layout, design and landscaping of all elements of the proposal, including any internal roads, pedestrian footpaths, cycle ways and open spaces, ~~are of high quality and respect the character of the site and local area~~ create user friendly, sustainable and inclusive connections between people and places resulting in the integration of the new development into the built and historic environment. k. Creating safe ~~and secure environments that minimise opportunity for crime and maximise natural surveillance~~ 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 pedestrian and cycle routes and high quality public space, which encourages the active and continual use of public areas. ~~**National Technical Standards**~~ n) All new housing developments should result in a high standard of amenity for occupiers. The standard of amenity

			for occupiers should not be compromised by inadequate space, poor layout, poor or lacking outlook or inconvenient arrangements for waste, access or cycle storage. Developments should include adequate outside amenity space for the needs of residents. ~~All new homes should comply with all relevant design and quality codes in the National Technical Standards.~~ New homes designed specifically to accommodate the elderly should comply with the National Technical Standards' optional standard M4(3A) in accordance with policy H2. v) New public open space should be provided in a single central useable facility where possible, which is accessible,.....
MM30	67	8.28	~~All new housing developments should be in accordance with the National Technical Standards. The Department for Communities and Local Government has carried out a major review of the technical standards which councils impose on new dwellings as planning conditions with a view to simplifying them and incorporating such standards in the Building Regulations as far as possible. The Building Regulations (Amendment) Regulations, 2015 reflect the outcome of the review as far as the Building Regulations and the building control system are concerned. The review has also resulted in a national space standard for new dwellings. This standard has not been incorporated into the Building Regulations. The standard may be imposed by the Council as a planning condition. Checking whether the standard, where imposed, has been complied with and any enforcement action remains the responsibility of the Council, though it is open for the Council to ask for the assistance of building control bodies in doing so.~~ The Framework stresses that great importance should be given to the design of the built environment. Policy GD7 sets out a series of criteria relating to different aspects of design. These are well understood principles which derive from the wider principles of sustainable development, such as the drive to a low-carbon future, conservation of the natural environment, promoting sustainable economic development and the creation of sustainable communities in healthy environments. *Add new paragraph after 8.32:* Mandatory housing standards are applied through the Building Regulations. Applicants will need to be aware of these requirements when designing development proposals. In addition optional technical standards may be applied if there is evidence of need. In this case there is evidence to support the application of optional technical standard M4(3A) which is referred to in criterion n. of Policy GD7 and Policy H2. The application of this standard will be secured through planning

			conditions. *Renumber subsequent paragraphs in chapter*
MM31	75	EC1	The Local Plan provides sites for 62 ha of new employment land to be delivered during the plan period. The ~~residual requirement will be met on the~~ following sites~~, which~~ are allocated and ~~also~~ identified on the Policies Map accompanying this plan. Appropriate uses for each site are listed in the table above. In these locations, ~~Development~~development proposals for alternative uses to those listed above ~~in these locations~~ will be resisted, unless it is demonstrated to the satisfaction of the Council that there is no reasonable prospect of the site being used for ~~employment~~ the specified purposes, having satisfied the tests of Policy GD8. Proposals for alternative uses will also have to satisfy the requirements of other policies of the Plan, in particular Policy GD7. ~~Where unacceptable harm is not caused, the following uses will be permitted:~~ ~~• employment development Class B1. Business – B1(a) as an office other than a use within class A2 (financial and professional services); B1(b) for research and development of products or processes; or B1(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.~~ ~~• Class B2. General Industrial and~~ ~~• Class B8. Storage or distribution.~~ Within the existing business and industrial areas, listed below, land and premises ~~in Class B Business and Industrial uses~~ will be retained ~~in that use class~~ within the acceptable use classes shown in the table below, unless it is demonstrated to the satisfaction of the Council that there is no reasonable prospect of the site being used for ~~employment~~ those purposes, having satisfied the tests of Policy GD8. Proposals for alternative uses will also have to satisfy the requirements of other policies of the Plan, in particular Policy GD7.
MM32	74	9.12	Consequently, this results in ~~a net~~ an adjusted requirement ~~of~~ for employment land in Fylde, up to 2032, of 62.0 Ha as summarized in table 3 below. ~~Net~~ Adjusted business and industrial land requirement 60.6 - (3.0 + 2.0 + 8.9) + 15.3

MM33	77	9.15	*Add additional paragraph:* Blackpool Airport Enterprise Zone (Site ES5) is allocated in Policy EC1 to provide 14.5 Ha of additional land in the employment uses listed in the policy for that site. The precise mix of uses will be determined through the Masterplan. By contrast, the Lancashire Advanced Engineering and Manufacturing Enterprise Zone at BAE Systems Warton, is listed in Policy EC1 as an existing employment site. This is previously-developed land, contained within the existing BAE Systems site. Policies EC3 and EC4 provide further clarification as to the development that may be brought forward at each site.
MM34	78	EC2	The availability of land in the borough for employment opportunities is limited. Therefore, the Council seeks to retain continued employment use of ~~existing~~ current employment sites. This could include any type of employment use, including agriculture, and may not be restricted to B1, B2 and B8 land uses. Land and premises will be retained in employment uses 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 GD8. Proposals for alternative uses will also have to satisfy the requirements of other policies of the Plan, in particular Policy GD7.
MM35	81	EC4	a. **The Blackpool Airport Enterprise Zone** The boundary of the Enterprise Zone is identified on the **Policies Map**. The designation of the Blackpool Airport Enterprise Zone will help create more businesses, jobs and attract international investment, with positive benefits across the wider economic 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 facilities closer to the main runway, in the areas outside the green belt, unless there are overriding operational requirements that constitute very special circumstances and which justify development in the Green Belt. The Enterprise Zone will help improve the local economy and also increase the contribution to national growth through targeting the energy industry, advanced manufacturing and engineering, food and drink manufacture and the digital and creative sector.
MM36	85	EC5	The town, district and local centres; and primary and secondary frontages are defined on the Policies Map which includes Inset Plans and accompanies this plan. **Development Outside of ~~Town~~ Centres**

			Proposals for retail, leisure and office development in 'edge of centre' or 'out-of-centre' locations will be considered in line with the Framework, bearing in mind the impacts on existing centres. When assessing proposals for retail, leisure and office development outside of ~~town~~ centres, a local threshold of any development more than 750 square metres, will apply in terms of requiring a retail impact assessment..... *Under c. Local Centres, add additional bullet:* • A local centre is proposed in Whyndyke ~~**Out of Centre**~~ ~~Proposals for retail, leisure and office development in 'edge of centre' or 'out-of-centre' locations will be considered in line with the Framework, bearing in mind the impacts on existing centres.~~
MM37	93	EC7	~~Non serviced~~ Loss of serviced tourist accommodation either to non-serviced accommodation or to other uses in these areas will be resisted.
MM38	98	H1	The Council will provide for and manage the delivery of new housing by: a) Setting and applying a minimum housing requirements ~~as follows:~~ of ~~• 370~~ 415 net homes per annum for the plan period 2011-2032 b) Keeping under review housing delivery performance on the basis of rolling 3 year completion levels as set out in accordance with the Monitoring Framework at Appendix 8. ~~If, over the latest 3 year review period, any targets relating to housing completions are missed by more than 20% the delivery of uncommitted sites will be adjusted as appropriate to achieve a higher delivery; provided this would not adversely impact on existing housing or markets within or outside the Local Plan area.,~~ c) Ensuring there is enough deliverable land suitable for house building capable of providing a continuous 5 year supply calculated using the "Liverpool" method from the start of each annual monitoring period and in locations that are in line with the Policy DLF1 (Development Locations for Fylde) and suitable for developments that will provide the range and mix of house types necessary to meet the requirements of the Local Plan. d) The delivery of the developable sites, which are allocated

			for housing and mixed use from 1 April 2011 to 31 March 2032 and provided for through allowances, to provide ~~a total~~ for a minimum of ~~7,891~~ 8,715 homes.
MM39	96	10.13-10.17 and 10.19	10.13 ~~The findings of the original SHMA and Addendums 1 and 2 have been incorporated into the Housing Requirement Paper 2015 which sets out the Council's housing requirement figure. The Housing Requirement Paper also considers the local economy, market signals (as set out in the Planning Practice Guidance) and the need for affordable housing. It concludes that a figure of 370 dwellings per annum will meet Fylde's objectively assessed need to 2032.~~ The 2014-based household projections to 2039 for England were published on 12 July 2016, and provide a new 'starting point' for the assessment of housing needs in line with the PPG. A further piece of work was commissioned by Fylde to take account of the 2014 SNHP and updated economic forecasts – The Objectively Assessed Housing and Economic Development Needs and the Fylde Local Plan to 2032(May 2017) (Addendum 3). Addendum 3 concludes that the evidence indicates an Objectively Assessed Need (OAN) of between 410-430 dwellings per annum. The Council has considered the findings and has determined the housing requirement for the 2011-2032 plan period is 415 net dwellings per annum. 10.14 This figure of ~~370~~ 415 dwellings per annum ~~will be~~ has been used to determine how much deliverable land ~~will be~~ is allocated in the Fylde Local Plan to 2032.... 10.15 Councils are required to have a five year supply of housing land available ~~(SHLAA, 2015)~~. Where an authority is unable to demonstrate a five year supply, applications for housing development will be decided with regard to ~~policy NP1,~~ the 'presumption in favour of sustainable development' contained within paragraph 14 of the Framework. Unless there is an overriding reason why an application should be refused, the Council may find it difficult to resist development which it may consider unsuitable for other reasons. The housing supply will be reviewed at least annually as part of the Council's Authority Monitoring Report and Housing Land Supply Statement. 10.16 The historic rate of delivery of new homes in Fylde, before the recession, averaged around 250 homes each year. The annual housing requirement for Fylde is ~~370~~ 415 net dwellings per annum. A calculation of ~~370~~ 415 net dwellings per annum for 21 complete calendar years from 1 April 2011 to 31 March 2032 produces an overall net housing requirement figure of a minimum of ~~7,768~~ 8,715 for the Plan period. The Council has identified sufficient sites, including an allowance for small sites and windfalls, to provide a supply figure of ~~7,891~~ 8,819 homes over the Plan period. 10.17 ~~The supply provides a small amount of headroom above the housing requirement for the Plan period:~~ ~~• Requirement: 7,768 homes~~

			~~• Proposed supply: 7,891 homes~~ ~~The proposed supply will provide approximately 376 homes over 21 years which amounts to an extra 6 homes per year.~~ 1,538 dwellings have been completed in Fylde from 2011-2017, an average of 256 dwellings per annum. When this figure is subtracted from the overall plan period requirement of 8,715, it gives a residual requirement of 7,177 dwellings to be completed from 2017 to 2032. This figure (7,177) includes the shortfall which has accrued during the early years of the plan when large sites were in the planning process. This equates to 479 dwellings per annum for the remaining years of the plan period. This is the 'Liverpool' method, for the purpose of calculating the 5 year housing land supply and is necessary in order to provide the most effective strategy to facilitate the delivery of housing during the plan period. 10.19 The trajectory at Appendix 2 ~~sets out in detail when it is~~ shows the anticipated ~~that individual sites will deliver~~ delivery of homes in relation to the requirement, throughout the plan period to 2032. A detailed trajectory will be published at least annually as part of the Council's Housing Land Supply Statement. The Council's ~~annual~~ monitoring of housing completions has revealed that since the start of the Local Plan period a shortfall of ~~802~~952 homes has accrued as at 31st March 2017. Planning application commitments amount to ~~5,087~~ 6,111 homes as at ~~31 March 2016~~ 30th September 2017. This means that is ~~65%~~ 70% of the requirement for the plan period~~'s requirement~~ already has planning permission. Completions are anticipated to increase as larger sites commence delivery. ~~The shortfall of 802 homes has been spread over the remainder of the plan period and added onto the annual requirement figure of 370 homes resulting in an annual requirement figure of 420 homes from 2016-2032.~~ The shortfall of 952 homes will be delivered over the remainder of the plan period to 2032.
MM40	99	H2	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. **Mix** 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 as set out in the Fylde Coast Strategic Housing Market Assessment (2014). The mix required will be adjusted according to updated future Housing Needs Assessments over the plan period. 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. These requirements will be adjusted in response to the findings of future Housing Needs Assessments conducted on behalf of the Council.
MM41	101	10.25	*Add new text at end of paragraph:* Lower net residential densities may be justified, where it would reflect and enhance the local character of the surrounding area in accordance with Policy GD7, whilst also making efficient use of land as required.
MM42	107	H4	All market housing schemes of 10 or more homes will be required to provide 30% affordable housing ~~/ starter homes~~, unless robust viability testing…… **Tenure** ~~Developers will be required to provide the number of starter homes on site to meet the Starter Homes Requirement in accordance with the proportion of new homes specified in the Regulations. The remainder of affordable housing, to make the total to 30% of all new homes, should be for social rent or affordable rent through a Registered Social Landlord to applicants in housing need, unless otherwise specified by the Council.~~
MM43	111	H5	~~The Local Plan will deliver a total of 26 extra pitches for Gypsies and Travellers in Fylde Borough up to the year 2031:~~ ~~• 17 of which need to be delivered in the period 2014-2019,~~ ~~• 3 more in the period 2019-2024,~~ ~~• 4 more pitches in 2024-2029, and~~ ~~• 2 additional pitches in 2029-2031~~ The Local Plan will provide sites for 3 extra pitches for Gypsies and Travellers meeting the definition in Annex 1 of the Planning Policy for Traveller Sites 2015 in Fylde Borough up to the year 2032. The allocations are commitments which provide 5 pitches. New Gypsy and Traveller pitches will be allocated at the following site~~(s)~~: • Thames Street, Newton (up to 3 pitches) • The Stackyard, Bryning with Warton (2 pitches) ~~The Council will continue to work with local communities including Gypsies and Travellers in order to identify sites to meet the identified need. However, in the absence of sufficient sites coming forward to meet the identified need, in addition to the sites identified above,~~ Where there is a demonstrated need for pitches or plots from Gypsies, Travellers and/or Travelling Showpeople in the borough, as defined in National Planning Policy, which is additional to the need identified by the Blackpool, Fylde and Wyre Gypsy and

			Traveller Accommodation Assessment Update 2016, and cannot be accommodated within the allocated sites, planning permission for new Gypsies, Travellers and Travelling Showpeople's sites will be granted where all of the following criteria can be met: a. There is evidence of need for a new Gypsy, Traveller or Travelling Showpeople's site and the site would provide for the permanent and/or transit accommodation needs in that area or neighbouring authority area;..... ~~f. The detailed design of the site for Gypsies and Travellers should be in accordance with The Designing Gypsy and Traveller Sites Good Practice Guide DCLG 2008. Smaller sites of 3-4 pitches are successful, making good use of small plots of land, particularly where designed for one extended family. (Criterion f does not apply to Travelling Showpeople Sites);~~.....
MM44	112-113	10.76-10.79 and 10.81	10.76 ~~National~~ Planning Policy for Traveller Sites~~, March 2012,~~ 2015 ~~says~~ states that councils will need to set ~~their own~~ pitch targets for Gypsies and Travellers and plot targets for Travelling Show People, which address the likely permanent and transit accommodation needs of travellers in their area, working collaboratively with neighbouring planning authorities. Planning Policy for Traveller Sites 2015 requires that the Council should identify a supply of deliverable land sufficient to provide five years-worth of pitches, identify a supply of specific developable sites or broad locations for years 6-10 and where possible years 11-15. ~~The National Planning Policy for Traveller Sites requires councils to allocate sites. In addition, Travelling Showpeoples' sites will need to include mixed uses. There will therefore be implications for employment as well as housing land.~~ Annex 1 of Planning Policy for Traveller Sites 2015 provides the definition of Gypsies and Travellers and Travelling Showpeople for the purposes of national planning policy. 10.77 Fylde Council, Wyre Borough Council and Blackpool Council (the Fylde Coast sub-regional` Authorities) jointly commissioned consultants~~,~~ Opinion Research Services to carry out a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) in 2014. ~~Planning Policy for Traveller Sites concludes that the Council should identify a supply of deliverable land sufficient to provide five years-worth of pitches, identify a supply of specific developable sites or broad locations for years 6-10 and where possible years 11-15.~~ An update of the GTAA was undertaken in 2016, to take account of the fact that the definitions of Gypsies, Travellers and Travelling Showpeople used in the original assessment were out-of-date. The GTAA and its Update should be read in conjunction. 10.78 The GTAA Update 2016 provides an up-to-date

			understanding of the likely permanent and transit accommodation needs of Gypsies, Travellers and Travelling Showpeople within the Fylde Coast sub-region as a whole and for each of the three Councils. The study also provides an evidence base to enable the authorities to comply with their requirements towards Gypsies and Travellers and Travelling Showpeople under the Housing Act, 2004. The estimated new pitch provision required for Gypsies and Travellers in the Fylde Coast sub-region ~~over the next 17 years~~ to 2031 is ~~82~~ 16 pitches to address local needs. For Fylde Borough, a total of ~~26~~ 3 extra pitches, for Gypsies and Travellers, are required up to the year 2031.~~:~~ ~~• 17 pitches need to be delivered in the period 2014-2019,~~ ~~• 3 more pitches in the period 2019-2024,~~ ~~• 4 more pitches in 2024-2029, and~~ ~~• 2 additional pitches in 2029-2031.~~ ~~The GTAA is being updated in 2016, the Council is working jointly with Wyre and Blackpool Councils under the Duty to Cooperate, including consideration of the changes to national policy. The required pitch provision will be reviewed in response to the sub-regional need identified in the updated GTAA.~~ 10.79 The estimated extra residential plot provision required for Travelling Showpeople in the Fylde Coast sub-region ~~over the next 17 years~~ to 2031 is ~~14~~ 24 plots, to address local needs. For Fylde Borough, no extra plots are required for Travelling Showpeople over the ~~next 17 years~~ period to 2031. 10.81 Policy H5 sets out the location for the provision of pitches for Gypsies and Travellers in Fylde up to 2031, in accordance with ~~the timetable set out in~~ the Fylde Coast GTAA. A Call for Sites was undertaken in January – February 2015, but this did not result in the identification of any suitable sites. The sites shown in policy H5 are committed. The Council will regularly issue calls for sites and consider other potential sources of sites to meet ~~identified~~ need for pitches/plots for Gypsies, Travellers and Travelling Showpeople meeting the definition in Annex 1 of the Planning Policy for Traveller Sites 2015, when it is identified.
MM45	113	H6	3. Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or 4. W~~w~~here the development would re-use redundant or disused buildings and lead to enhancement in the immediate setting.

MM46	114	H7	a. The replacement or extended home is increased in size by ~~a maximum of~~ no more than 33% calculated in relation to the ground floor area of the original home. ~~(This calculation will exclude any outbuildings and integral garages/workshops)~~; and b. The appearance of ~~the~~ a replacement ~~or extended~~ home respects the character of the ~~original building and~~ surrounding rural area and the appearance of an extended home respects the character of the original building and the surrounding rural area. ~~with regard to scale, design and use of materials.~~
MM47	114	10.86	The policy therefore includes a maximum 33% increase in ground floor area for the replacement or extension of a home in the countryside. It is considered that this will ensure that such development is proportionate to the size of the original dwelling. The policy itself has a two-pronged approach which considers both the size and appearance of the proposal. Evidence collected by the Council demonstrates that ~~F~~fifty one percent of completions of rural homes – excluding barn conversion, caravans and apartments – are four or more bedroomed homes (2003 – 2016). It is vital that the stock of smaller properties in the countryside is maintained, thereby providing more affordable properties and enabling people to downsize, whilst remaining in their local area.
MM48	118	HW1	In order to help reduce health inequalities, the Council will require health impact screening to be undertaken for all major development proposals on each Strategic Site (100 or more homes) within the Strategic Locations for Development ~~strategic sites~~ through the submission of a masterplan. A full independent Health Impact Assessment will be required if the screening demonstrates a need. The Health Impact Assessments will be assessed by Lancashire County Council, as the public health authority. The outcomes of the screening process should be reflected in the development proposal and should be a consideration in decision-making.
MM49	121	HW2	Development proposals for new community facilities – including developments within the new local centres at Warton, Whyndyke and Whitehills…. ~~A site for a new primary school will be reserved at Mowbreck Lane, in Wesham – as identified on the Policies Map – for the re-location of Medlar with Wesham CE Primary School on Garstang Road North, in Wesham.~~ Indicative sites for new primary schools are identified within the development sites at Queensway (HSS1) and Whyndyke (MUS2) and are shown on the Policies Map. The Council will work with the Education Authority to identify and deliver a site for a new secondary school once a need is demonstrated within the plan period.
MM50	122	11.28	*Delete paragraph, renumber subsequent paragraphs within*

			chapter
MM51	123	HW3	*Amend as follows:* 1. Protect existing indoor and outdoor sports facilities, unless: ~~Either:~~ a) They are proven to be surplus to need, as identified in an adopted and up to date Needs Assessment[1]; and/or b) ..... This would be over and above any provision made available through CIL ~~2~~; and/or *Last sentence:* 3. .... Commuted sums should be obtained in accordance with an up-to-date adopted Needs Assessment Action Plan[3]. ~~NOTE:~~ ~~2. Mitigation for the loss of a sports facility/playing field under paragraph 74 of the NPPF does not fall within CIL Regulations.~~
MM52	127	12.6	There is a shortage of ~~both~~ primary ~~and secondary~~ school places in Fylde. The need for new primary schools are identified in Policy HW2 with provision to be included within development sites at Queensway (HSS1) and Whyndyke (MUS2. ~~The priority at present is delivering primary school places. Secondary school provision is almost at capacity. LCC has identified~~ There may be a need for a new secondary school in the Borough within the Plan period, which runs up to 31 March 2032. The Council will work with the Education Authority to identify and deliver a site for a new secondary school once a need is demonstrated during the plan period. ~~LCC is working with Fylde Council to ensure that an appropriate site for a new secondary school is identified and provided.~~
MM53	128	12.9	To ensure Fylde's infrastructure capacity is maximised, development of Strategic Sites within the Strategic Locations for Development should be masterplanned in accordance with policy M1. ~~and~~ Developments should be located where there is existing infrastructure capacity, wherever possible.
MM54		INF2	f) ~~The provision of a new Local Service Centre at~~ The development of Whitehills, ~~Whyndyke~~ and ~~at~~ Warton to become Local Service Centres, including land and buildings to accommodate new ~~local retail centres~~ Local Centres to provide services and meet the daily retail needs of the local residents;
MM55		12.37	Proposals for new roads and for strategic highways improvements will need to comply with the requirements of policy GD7: Achieving Good Design in Development, policy

			ENV1 on landscape, and policy ENV2 on biodiversity and policy ENV5 on Historic Environment.
MM56	134	T2	The Aerodrome at Warton is a key piece of strategic infrastructure. The Council places great importance on the retention and development of its aviation capabilities, particularly in relation to military aerospace and information. ~~Further d~~Development proposals within the defined safeguarded area ~~north of the BAE Systems runway~~ at Warton Aerodrome~~, Freckleton~~ will not be permitted~~, except limited extension to existing properties.~~ unless the applicant can demonstrate that there would not be any potential for adverse impacts on aviation operations, or on defence navigation systems and communications. Development proposals within the wider area surrounding Warton Aerodrome will be assessed for potential for adverse impacts on aviation operations, and on defence navigation systems and communications. Where such impact is identified, planning permission will be refused. Development proposals that could compromise the security of the Warton Aerodrome and wider BAE Systems site at Warton will not be permitted.
MM57	134	12.38	~~To the north of BAE Systems runway at Warton Aerodrome, in Freckleton there are a number of fields which have to date remained undeveloped because they were safeguarded from development in the adopted Local Plan. In view of their close proximity to the aerodrome and taking into account the nature of the operations at BAE Systems, which include the testing of experimental aircraft, and the recorded high level of noise in the area, the Council considers that the open areas on the north side of the runway should remain undeveloped. This view has been endorsed by the Ministry of Defence.~~ Warton Aerodrome forms a key piece of strategic infrastructure; the site is designated as an Enterprise Zone and is a major existing employment site, itself of national strategic importance. The aerodrome provides a secure military testing facility for aircraft assembled in the adjoining manufacturing plant. Obviating impacts on the operation of the aerodrome is therefore of great strategic importance. Policy T2 therefore places great importance on the avoidance of impacts on aviation and communications. Safeguarded areas for Warton Aerodrome are determined in accordance with The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Storage Areas) Direction 2002 (As Updated). Safeguarded areas are identified on safeguarding maps which are provided by the operator and certified (in the case of Warton) by the Ministry of Defence. The safeguarded area reflects the need to restrict built development within the zone immediately surrounding the site, but also the need to restrict the height of built development in wider zones, in order to ensure safety for both aircraft crew and people on the ground. It also reflects the

			need to prevent interference to communication systems.
MM58	135	T3	*First line:* The land designated as Green Belt within ~~open lands of~~ the airport, ~~which is identified on the Policies Map~~ will be safeguarded.....
MM59	135-136	12.41-12.42 and 12.46	12.41 The majority of the residual airport lands are designated as Green Belt in order to retain the separation between Blackpool and St Annes. The Council will safeguard the residual airport lands in the interests of the Airport and the Green Belt. Sufficient land within the Airport complex ~~has been omitted from~~ falls outside the Green Belt to facilitate further airport operational development. Development proposals within the Green Belt, whether to provide for airport operational development, or other development associated with the Enterprise Zone, would have to demonstrate very special circumstances to justify the need to use Green Belt land. *Final sentence:* 12.42 The maps showing the safeguarded areas ~~that~~ are certified by the Civil Aviation Authority. 12.46 Safeguarded areas for Blackpool Airport are determined in accordance with The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Storage Areas) Direction 2002 (As Updated). Safeguarded areas are identified on safeguarding maps which are provided by the operator and certified (in the case of Blackpool) by the Civil Aviation Authority. The safeguarded area reflects the need to restrict built development within the zone immediately surrounding the site, but also the need to restrict the height of built development in wider zones, in order to ensure safety both for aircraft crew and passengers, and for people on the ground. It also reflects the need to prevent interference to communication systems and the creation of bird hazard. All planning applications within the ~~Airport~~ Safeguarding ~~Zone~~ Area will be the subject of consultation with the operator of the airport. ~~The Airport Safeguarding Zone around Blackpool Airport, incorporates Centrica's heliport. Elsewhere in the Borough, development over a certain height will also be the subject of consultation. There may be restrictions on the height or detailed design of buildings or on development which might create a bird hazard.~~
MM60	139	T4	l) Improve and upgrade the North Fylde Railway Line and the South Fylde Railway Line, including improved service frequency on the latter; and All planning applications for developments that generate

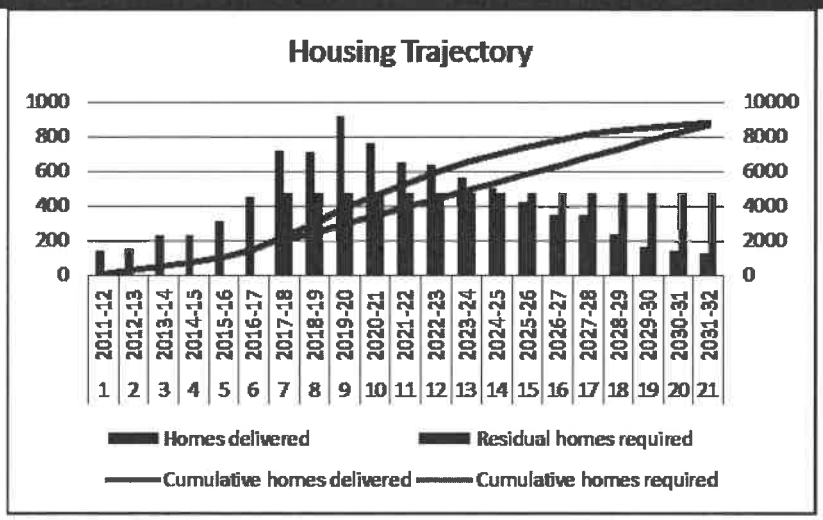
			significant amounts of movement should be supported by a Transport Statement or Transport Assessment, prepared in accordance with the Planning Practice Guidance~~;~~. Any mitigation identified in the Transport Assessment or Transport Statement that is required to make the development acceptable must be implemented in accordance with the requirements of the Highway Authority.
MM61	154	CL3	*First paragraph:* Renewable and low carbon energy development potential – excluding on shore wind turbines - is significant in Fylde. ~~Developers of commercial, small and medium-sized renewable and low carbon energy developments will be required to provide evidence, to the satisfaction of the Council, in support of their proposals by taking into account all of the following:~~ Opportunities for renewable and low carbon development, including microgeneration, should be maximised, while ensuring that adverse impacts are addressed satisfactorily; including cumulative landscape and visual impacts. Proposed developments will be assessed in relation to the following criteria:
MM62	155	CL3	e. Impacts on land resources, in particular that the development would not be sited on the best and most versatile agricultural land (grades 1, 2 and 3a), unless it is demonstrated that poorer quality land could not be used instead, and that the benefits of the development outweigh the economic and other benefits of the best and most versatile agricultural land and any other adverse impacts of the proposal. In the case of solar farms, the most compelling evidence must be provided to demonstrate the above. Impacts should also be considered on ~~and~~ areas of deep peat which function as a carbon store. f. That the proposal for renewable and low carbon energy would not harm the significance of heritage assets and their settings unless the proposal meets the requirements of Policy ENV5. Renewable and low carbon energy proposals within the Green Belt ~~and Areas of Separation~~ will need to demonstrate ~~that any adverse impacts of granting permission will not significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole, specific policies in that Framework, or other policies in the Local Plan~~ very special circumstances where elements of any proposed renewable energy project comprises inappropriate development. Renewable and low carbon energy proposals within Areas of Separation will be assessed in terms of its impact upon the effectiveness of the gap between the settlements in protecting the identity and distinctiveness of settlements.

MM63	156	13.54	~~In March 2015 a ministerial statement~~ The Written Ministerial Statement on Solar Energy: Protecting the Local and Global Environment made on 25 March 2015 raised concerns that…..
MM64	160	ENV1	*At the end of the first paragraph add:* Development will also need to have regard to any impact on valued landscapes. In addition:
MM65	161	14.6	*In the last line:* The Council intends to ~~prepare a Valued Landscapes SPD in 2017, to accompany policy ENV1~~ carry out landscape appraisals to assist in identifying valued landscapes that accord with paragraph 109 of the Framework.
MM66	164	ENV2	*In the last paragraph in section A:* Development that would directly or indirectly affect any sites of local importance including ancient woodland or ancient and veteran trees will be permitted only where…..
MM67	170	ENV3	Protecting Existing Open Space (Part of the Green Infrastructure network) Existing Open Space is identified on the **Policies Map** denoted by the following descriptions: • Parks and Gardens • Semi-Natural Greenspaces • Amenity Greenspace • Children's Play Areas • Local Areas and Local Equipped Areas for Play • Youth Provision • Allotments • Cemeteries/Churchyards • Football Pitches • Rugby Pitches • Cricket Pitches The ~~existing~~ areas of Existing ~~o~~Open ~~s~~Space ~~which are identified on the **Policies Map,** comprise~~ provide a critically important part of the Green Infrastructure network within Fylde. ~~The Green Infrastructure network~~ Existing Open Space will be protected from inappropriate development, having particular regard to the multi-functional benefits of open spaces, as follows: a. ~~Public~~ Existing Oopen Sspace ~~(the Green Infrastructure~~

			~~network)~~, including sports and playing pitches (subject to policy HW3: Protection and Provision of Indoor and Outdoor Sports Facilities), will be protected unless the requirements of paragraph 74 of the Framework are met and the findings of any published and adopted needs assessment are met. b. ~~Public~~Existing ~~o~~Open ~~s~~Space ~~(the Green Infrastructure network)~~, including sports and playing pitches (subject to policy **HW3:** Protection and Provision of Indoor and Outdoor Sports Facilities), will be protected unless it can be demonstrated that any proposal will not have adverse effects contrary to the landscape, biodiversity and water management requirements of the Local Plan ~~are met~~, and the requirements set out in the other criteria in this policy are met. c. Development will not be permitted on Eexisting ~~public~~ Oopen Sspace ~~(the Green Infrastructure network)~~ which is considered ..... d. Development will not be permitted on Existing Oopen Sspace that makes a positive contribution to the historic environment including the character, appearance and setting of conservation areas and listed buildings, unless the proposal meets the requirements of Policy ENV5. ~~e. Development that results in the loss of public open space (the Green Infrastructure network) or sports and recreation facilities (including playing fields) will only be permitted if one of the following criteria are met:~~ ~~• The open space has been identified by the council as being unsuitable for retention because it is poorly located;~~ ~~• the proposed development would be ancillary to the use of the site as open space and the benefits to recreation would outweigh any loss of the open area; or~~ ~~• Successful mitigation takes place and alternative, enhanced provision is provided in the same locality.~~ ~~f~~e. Development that results in the loss of land ~~currently~~ used for allotments as shown on the Policies Map will only be permitted when: ~~g~~f. Fylde's Public Rights of Way network.....
MM68	176	ENV5	*Amend as follows:* In addition the Council will: • Work with partners to design and manage the public realm in historic areas. • Look for opportunities for new development within the Borough's Conservation Areas and within the setting of heritage assets to enhance or better reveal their

			significance. *Last paragraph under listed buildings amend and add:* W~~T~~here the loss of the whole or part of a heritage asset is approved this will be subject to an appropriate condition or planning obligation to ensure that any loss will not occur until a contract is in place to carry out the development that has been approved. Where development proposals lead to less than substantial harm to the significance of a designated heritage asset, this harm shall be weighed against the public benefits of the proposal, including securing its optimum viable use, having special regard to the desirability of preserving the building, its setting and any features of special architectural or historic interest it possesses. *Under Conservation Areas amend as follows:* 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, ... Proposals should: b. Preserve or enhance features~~,~~ making a positive contribution~~.,~~ ~~in~~In particular, ... c. Not have an unacceptable impact on historic street patterns or roofs~~pac~~cape *Last line under Public Realm and the Historic Environment:* The public realm needs to be appropriately managed and maintained, in accordance with the Built Heritage Strategy for Fylde, so that it adds to the character, quality and distinctiveness of the heritage asset. **~~Registered Historic Parks and Gardens~~** *Under Registered Historic Parks and Gardens amend as:* • Lytham Hall Park, Lytham~~.~~ should ensure that development does not cause ~~significant~~ harm to the enjoyment, layout, design, quality, character, appearance or setting of that landscape, cause harm to key views from or towards these landscapes or~~, where appropriate,~~ prejudice their future restoration. *Under locally important heritage assets amend the first two*

			paragraphs: ….These include Fairhaven Lake, Clifton Hall, Singleton Hall, Memorial Park in Kirkham~~, Lowther Gardens, Lytham Green~~, Lytham Park cemetery gardens and the Lancaster Canal. The Council recognises the importance of these assets and will therefore designate such assets through a Local List to strengthen the presumption in favour of their ~~retention~~ conservation. Development which would remove, harm or undermine the significance of a locally important heritage asset, or its contribution to the character of the area, will only be permitted ~~in exceptional circumstances,~~ where robust evidence can demonstrate that the public benefits of the development would ~~clearly~~ outweigh the harm based on a balanced judgement. *Under scheduled monuments and other archaeological remains amend as:* Development which would result in harm to the significance of a scheduled monument ~~and~~ or other nationally important archaeological ~~site~~ sites will not be permitted~~,~~ unless it can be demonstrated that the public benefits which cannot be met in any other way ~~of the development~~ would clearly outweigh the harm. Where there is ~~the~~ known or potential ~~for~~ non-designated archaeology, developers will be expected to investigate the significance of ~~the~~ any archaeology prior to the determination of an application for the site…… Developers need to undertake research at an appropriate early stage to ~~find out where archaeological remains are~~ establish whether or not archaeology exists or whether there is the potential for it to exist in order to inform decisions in respect of the site…..
MM69	209	Appendix 2 Housing Trajectory	*Replace the information in the main table of the Housing Trajectory with a graph.*

			
MM70	227-232	Appendix 8 Performance Monitoring Framework	*Sixth paragraph:* The Performance Monitoring Framework of key policies in the Local Plan, set out below, identifies indicators relevant to the objectives of the Local Plan. Monitoring will help to identify how well the policies are working and also identify any ~~adverse effects~~ deficiencies in the performance of policies. If any ~~adverse effects arise~~ Trigger for Action points are reached, this will ~~trigger a review~~ invoke the Contingency/Action required: these are set out in the table. ~~The policies will be reviewed or mitigation measures developed to overcome and prevent further adverse effects.~~ *Add columns:* Trigger for Action; *and* Contingency/Action *(between fourth and fifth columns)* **Indicator 1:** Indicator: ~~Net additional homes completed~~ Annual net homes completions against the residual number required for 2018-2032 of 479 homes per annum Target: Annual net homes completions ~~against~~ to be at least the ~~target requirement~~ residual number required for 2018-2032 of ~~370~~ 479 homes per annum. Triggers: (1) Failure to deliver 95% of the residual number over a 3-year rolling period, i.e. 1,365 net homes over 3 years; (2) Failure to deliver 85% of the requirement over a 3-year rolling period, i.e. 1,221 net homes over 3 years (3) Failure to deliver 65% of the requirement over a 3-year rolling period, i.e. 934 net homes over 3 years Contingency: (1) Prepare and publish an action plan setting out key reasons for the situation and actions the Council and other parties need to take; (2) Plan for a 20% buffer on the Council's five year housing land supply, if necessary by bringing additional sites forward into the supply; (3) the

			presumption in favour of sustainable development as set out in the Framework would apply. A review of housing allocation policies will be conducted, to consider the need to allocate sites in order to prevent the continuation of the operation of the presumption in favour of sustainable development. **Indicator 2** Indicator: ~~5 Year supply~~ Number of years' supply of housing deliverable within 5 years (plus the required buffer) calculated using the Liverpool approach Target: To have a minimum of 5 years' supply (plus the required buffer) of housing land calculated using the Liverpool approach Trigger: Having fewer than 5 years' supply (plus the required buffer) calculated using the Liverpool approach Contingency: Consider granting planning permission for sites of between 10 and 15 homes on sites not allocated in the plan, adjacent to the settlement boundaries of the Strategic Locations for Development. **Indicator 3** Indicator: ~~Housing Trajectory.~~ Total number of homes (net) delivered within the plan period measured against the Housing Trajectory Target: To deliver a minimum of ~~**7,768**~~ **8,715 homes** (net) over the plan period from 1 April 2011 to 31 March 2032. Trigger: 20% shortfall on the cumulative requirement of the Housing Trajectory Contingency: Consider reviewing site allocation policies **Indicator 4** Indicator: ~~Location of homes completed in relation to the Strategic Locations for Development Policies.~~ Proportion of net homes completed in the Strategic Locations for Development (taken together). Proportion of net homes completed in the Non-strategic Locations Target: Cumulative homes completed (net) from the start of the Plan period on 1 April 2011 located within - ~~Lytham and St Annes Strategic Location: **23.3%**.~~ ~~Fylde-Blackpool Periphery Strategic Location: **29.2%**.~~ ~~Warton Strategic Location: **10.6%**.~~ ~~Kirkham and Wesham Strategic Location: **14.4%**.~~ ~~Non-Strategic Locations: **9.6%**~~ ~~Allowances: **12.8%**.~~

			Strategic Locations for Development: 90% Non-strategic Locations: 10% Trigger: Cumulative homes completed from the start of the Plan period on 1 April 2011 located within - Strategic Locations for Development: fewer than 80% Non-strategic Locations more than 15% Contingency: Consider the reasons for the imbalance in delivery compared to the target and whether there are any obstacles to delivery affecting sites in particular locations. ***Indicator 5**: delete indicator* ***Indicator 6 5** (renumber)* Indicator: Employment land take-up~~.~~: cumulative take-up of allocated employment land for employment development from the start of the plan period on 1 April 2011, compared to the requirement of 60.6 Ha (gross requirement) during the plan period divided pro-rata. Target: Cumulative take-up of allocated employment land for employment development from the start of the plan period on 1 April 2011, to be at least 90% of the ~~compared to the~~ requirement of 60.6 Ha (gross requirement) ~~during~~ at the end of the plan period. Trigger: Cumulative take up of allocated employment land for employment development less than 50% of the expected pro-rata amount, or more than 150% of the expected pro-rata amount. Contingency: Where take up of allocated employment land for employment development is higher than expected, consider review of allocation policies. Where take-up is lower, consider whether there are obstacles to take-up on particular sites that could be overcome. *Between indicators 6 and 7: add additional indicator: to be new **Indicator 6*** Policy: EC3 Lancashire Advanced Engineering and Manufacturing (AEM) Enterprise Zone at BAE Systems, Warton Indicator: Cumulative additional jobs created in Fylde over the plan period to date as a direct consequence of the incentives provided by the Enterprise Zone Target: Cumulative additional jobs created in Fylde in line with projection Trigger: Cumulative additional jobs created in Fylde varies from projection by more than 50% Contingency: Review whether the annual housing requirement

			for Fylde remains aligned with jobs growth within the borough as a whole. Key Delivery Partners: Fylde Council, Businesses, Developers and Investors. *Between indicators 6 and 7: add additional indicator after new indicator 6 above: to be **Indicator 7**; renumber all subsequent indicators* Policy: EC4 Blackpool Airport Enterprise Zone Indicator: Cumulative additional jobs created in Fylde over the plan period to date as a direct consequence of the incentives provided by the Enterprise Zone Target: Cumulative additional jobs created in Fylde in line with projection Trigger: Cumulative additional jobs created in Fylde varies from projection by more than 50% Contingency: Review whether the annual housing requirement for Fylde remains aligned with jobs growth within the borough as a whole. Key Delivery Partners: Fylde Council, Businesses, Developers and Investors. ***Indicator 7**: delete indicator* ***Indicator 8**: delete indicator* ***Indicator 9**: delete indicator* ***Indicator 10**: renumber: now indicator 8* Indicator: ~~Sustainable and efficient use of land~~ Density of completed housing development sites. To be calculated using a net developable site area of 60% of the site area for strategic sites. Target: ~~A density target of~~ 30 homes per hectare or more achieved on completed new-build sites representing at least 90% of the dwellings within those sites in any given year in Strategic Locations for Development, Key Service Centres, Local Service Centres and in Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements. To be calculated using a net developable site area of 60% of the site area for strategic sites. Trigger: 30 homes per hectare or more achieved on completed sites representing 75% or fewer of the dwellings within those sites in any given year in Strategic Locations for Development, Key Service Centres, Local Service Centres and

			in Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements. . To be calculated using a net developable site area of 60% of the site area for strategic sites. Contingency: Review how the policy is being applied, the age and circumstances of the planning permissions to which the completions relate where the target was not met; if the policy has been applied accurately to the permissions which led to the trigger being applied, consider whether the policy needs to be reviewed. *Between Indicators 10 and 11: additional indicator: to be* ***Indicator 9*** Local Plan Policies: H2 Density and Mix of New Residential Development Additional indicator: Proportion of dwellings with full planning permission and on sites which are not yet completed that will have: 1 bedroom; 2 bedrooms; 3 bedrooms; 4 bedrooms; 5 or more bedrooms. Information will be derived from the approved planning applications. Target: At least 50% of dwellings to have 1, 2 or 3 bedrooms. At least 33% of dwellings at non-strategic locations to have 1 or 2 bedrooms. These targets will be adjusted in response to the findings of future Housing Needs Assessments conducted on behalf of the Council. Trigger: Less than 50% of dwellings to have 1, 2 or 3 bedrooms. Less than 33% of dwellings at non-strategic locations to have 1 or 2 bedrooms. These triggers will be adjusted in response to the findings of future Housing Needs Assessments conducted on behalf of the Council. Contingency: Review how the policy is being applied, the age and circumstances of the planning permissions where the target was not met; if the policy has been applied accurately, consider whether the policy needs to be reviewed. Key Delivery Partners: Fylde Council, Housing Associations, Registered Providers, HCA, private landlords and Developers. *Indicator 11: renumber: now* ***Indicator 10*** Indicator: ~~Number of affordable homes built~~ Percentage of market housing schemes of 10 or more homes granted planning permission that provide 30% affordable homes. Target: ~~Number of~~ All market housing schemes of 10 or more ~~than 10~~ homes ~~that~~ to provide 30% affordable homes. Trigger: Fewer than 90% of market housing schemes of 10 or more homes granted planning permission in any given year provide 30% affordable homes. Contingency: Consider the circumstances of the permissions granted that have led to the trigger. If a generalised viability problem is indicated, consider a review of the requirement in

			the policy. *Indicator 12: renumber: now* ***Indicator 11*** Indicator: ~~Improving community health~~ Number of Health Impact Assessments (HIA) submitted alongside major planning applications on Strategic Sites. Target: ~~Number of~~ Health Impact Assessments (HIA) submitted alongside all major planning applications on Strategic Sites. Trigger: Planning Application for a Strategic Site validated without a Health Impact Assessment having been submitted Contingency: Review how the requirement for HIAs is being implemented. *Indicator 13 renumber: now* ***Indicator 12*** Indicator: Number, Type and Location of Infrastructure Projects delivered. ~~Value of developer contributions collected.~~ Target: ~~Amount collected each year (as well as the actual implementation of infrastructure projects).~~ All projects listed within the IDP delivered, or commenced delivery, during the plan period. Trigger: Failure to deliver a project that then results in a delay to the delivery of development sites allocated in the plan. Contingency: Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure need. ***Indicator 14****: delete indicator* ***Indicator 15****: delete indicator* *Indicator 16: renumber: now* ***Indicator 13*** Indicator: ~~Minimise the amount of inappropriate development in Flood Zones 2 and 3~~. Number of planning applications granted permission for inappropriate development in Flood Risk Zones 2 and 3. Target: ~~Number of~~ No planning applications granted permission for inappropriate development in Flood Risk Zones 2 and 3. Trigger: Planning application for inappropriate development in Flood Risk Zones 2 and/or 3 granted planning permission contrary to Environment Agency advice Contingency: Consider how the policy is being applied

			Indicator 17 renumber: now ***Indicator 14*** Indicator: Change in areas ~~of biodiversity importance.~~ of land covered by local, national or international policy protections for biodiversity, or areas provided for biodiversity in mitigation through developments Target: Net gains in areas of land specifically dedicated to and protected for biodiversity. Trigger: Fall in areas of land specifically dedicated to and protected for biodiversity. Contingency: Consider whether the fall in the areas of dedicated land has been offset by more effective use of the area of land that remains for biodiversity. If not, consider a review of how the policies have been applied. *Indicator 18: renumber: now* ***Indicator 15*** Indicator: Amount of indoor and outdoor sport, recreation and ~~informal~~ open space gained~~,~~ and lost to other uses, measured both by number and type of facilities, and by amount of space of each type (with reference to the typology used in the Open Space Study). Target: Net gains in indoor and outdoor sports facilities and open space provision, by both number of facilities and amount of open space. Trigger: Unexpected specific losses of facilities (without like for like replacement). Contingency: consider how the policy is being applied, whether any means exist of preventing or mitigating any loss. *Indicator 19a: renumber: now* ***Indicator 16*** Indicator: Number of Heritage Assets on Historic England's 'At Risk' register. Number of heritage assets at risk on Fylde's Local List of Heritage Assets (once established). Target: ~~No Heritage Assets in Fylde on Historic England's 'At Risk' register by the end of the plan period in 2032.~~ Reduction in the number of heritage assets on the Historic England's 'At Risk' register. Reduction in the number of heritage assets considered to be "at risk" on the local list of heritage assets once established. Trigger: Identification of a heritage asset newly listed on "at risk" register. Periodic increase in the number of heritage assets on the "at risk" register in the borough. Identification of a locally listed heritage asset that could be at risk through periodic review. Contingency: Consider how the Council can contribute to measures to improve the condition of the "at risk" heritage assets. Consider whether the policy is contributing to the

			neglect of heritage assets, and if so, consider whether the policy should be reviewed. ***Indicator 19b**: delete indicator* ***Indicator 19c**: delete indicator* ***Indicator 19d**: delete indicator* *Additional indicator after 19d add new* ***Indicator 17*** Policy: Policy EC1: Overall Provision of Employment Land and Existing Employment Sites Indicator: Cumulative additional jobs created in Fylde from the start of the plan period Target: Cumulative additional jobs created in Fylde in line with projection Trigger: Cumulative additional jobs created in Fylde varies from projection by more than 50% Contingency: Review whether the annual housing requirement for Fylde remains aligned with jobs growth within the borough as a whole. Key Delivery Partners: Fylde Council, Businesses, Developers and Investors.

0297

0297/M/01-12/C

Planning Policy
Wyre Council
Civic Centre
Breck Road
Poulton-le-Fylde
FY6 7PU

SENT BY EMAIL
planning.policy@wyre.gov.uk
23/10/2018

Dear Sir / Madam,

WYRE LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the Wyre Local Plan Main Modifications consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The HBF are pleased to see that the Council are now close to the completion of their Local Plan and we would like to submit the following representations in response to the Council's proposed main modifications.

MM/002: Introduction (1.4 The 'Duty to Co-operate') 0297/M/01/C
Whilst it is disappointing that the full OAN cannot be met either within Wyre or the housing market area at this time, the HBF considers that the modification to insert new paragraphs in relation to the Duty to Cooperate, the OAN and the Local Plan Review adds clarity and is beneficial.

MM/003: Local Plan Strategy 0297/M/02/C
As stated above, whilst it is disappointing that the full OAN cannot be met either within Wyre or the housing market area at this time, the HBF considers that the modification to paragraph 4.1.21 in relation to a commitment to ongoing engagement is valuable. The commitment to an early review and therefore the modification to paragraph 4.1.21 is also supported.

MM/004: Strategic Policies (5.1 Introduction) 0297/M/03/C

The HBF are supportive of the proposed amendment and the increase in the proportion of provision of the housing OAN.

MM/005: Strategic Policies (Policy SP1 Development Strategy) 0297/M/04/C
The HBF are generally supportive of the proposed modification to Policy SP1, point 3, including the addition of 'a minimum' and the increase in the housing requirement.

MM/022: Housing (7.2 Housing Land Supply) 0297/M/05/C
The HBF continues to have concerns in relation to a windfall allowance, as set out previously. However, the need to avoid double counting is supported.

Paragraph 7.2.5 states that the most appropriate way to deal with any shortfall since 1 April 2011 is for the shortfall to be met over the remainder of the Local Plan period. The HBF continue to consider that it is preferable to address any shortfall in delivery as soon as possible and preferably using the Sedgefield method, and that whilst that may be difficult in the short term, the Council should be actively working with homebuilders to deliver homes and reduce the shortfall.

The HBF agree with the addition of test to paragraph 7.2.6 to states that the figure in Policy HP1 is expressed as a minimum and there is no planning barrier to the early delivery of sites if circumstances and market conditions allow.

The HBF do not consider it is necessary to add the additional line at the end of paragraph 7.2.6 stating that the Sedgefield approach is not realistic, and it would lead to the Plan becoming out of date after adoption. It is considered that the final sentence is not effective as it adds little to the plan, and that it does not support a positively prepared plan as the issue identified could be resolved through the proactivity of the Council and housebuilders.

New paragraph 7.2.7 whilst it is considered that based on previous definitions of persistent under-delivery the 20% buffer would be appropriate it is noted that going forward this plan will be used in decision making alongside the 2018 NPPF. The 2018 NPPF provides details as to what buffer should be applied and in what circumstances. It is therefore queried if the addition of this paragraph is necessary or appropriate.

MM/023: Housing (Policy HP1 Housing Land Supply) 0297/M/06/C
The HBF is supportive of the addition of 'a minimum', the addition of 'at least' and the increase in the housing requirement, within point 1 of Policy HP1. The HBF also supports the deletion of point 2 of the policy.

MM/024: Housing (7.3 Housing Mix) 0297/M/07/C
The HBF supports the recognition within the text that the policy does not seek to impose any specific Building Regulation 'optional standards' but that it provides a flexible framework.

MM/026 Housing (7.4 Affordable Housing and Policy HP3 Affordable Housing)
The amendment to paragraph 7.4.2 and to Policy HP3 to increase the threshold to 11 or more dwellings is supported. 0297/M/09/C

MM/034: Housing (Policy HP9 Green Infrastructure in new residential developments) 0247/M/09/C

The amendment to Policy HP9 to increase the threshold to 11 or more dwellings is supported.

MM/089: Monitoring the Local Plan 0247/M/10/C

The HBF is generally supportive of the proposed modifications particularly reference to the Housing Implementation Strategy and the Local Plan Review.

MM/090: New Policy LPR1 – Wyre Local plan Review 0247/M/11/C

The HBF are supportive of the identification of the need to review the plan and the identification of clear timescales for that to happen.

MM/091: Table 10.1 0247/M/12/C

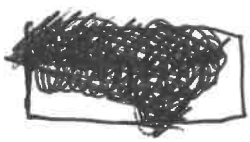
The HBF generally supports the proposed modifications to the monitoring framework, and consider that this will help to ensure that monitoring is more effective.

Future Engagement

I trust that the Council and the Inspector will find these comments useful as they continue to progress the Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

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.

Yours sincerely,



Joanne Harding
Local Plans Manager – North
Email: [redacted]
Phone: [redacted]

0343/M/01-06/C

highways england

0343

Rec'd 23/10/18

Warren Hilton
Assistant Asset Manager
8th Floor
Piccadilly Gate
Store Street
Manchester M1 2WD

Direct Line: [redacted]

23 October 2018

Réa Psillidou
Planning Policy and Economic Development Manager
Wyre Council
Civic Centre
Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

Dear Réa

PUBLICATION DRAFT WYRE LOCAL PLAN - PROPOSED MAIN MODIFICATIONS 2018

Thank you for inviting Highways England to comment upon Wyre Council's proposed main modifications to the Publication Draft Wyre Local Plan.

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.

Highways England's approach to engaging with the planning system is governed by the advice and guidance set out in **The Strategic Road Network Planning for the Future** - A guide to working with Highways England on planning matters (2015).

The document is written in the context of statutory responsibilities as set out in Highways England's Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development ('the Circular').

Following the Wyre Local Plan Examination in Public (EIP) held in May and June 2018, the Inspector recommended modifications to be made to the draft Publication Version Wyre Local Plan prior to it being submitted for approval to the Planning Inspectorate for approval.

In line with the Inspector's recommendations, we welcome the opportunity to comment upon the main and additional modifications that the Council is now consulting on.

Having considered all of the proposed main modifications, we now comment upon the modifications that we consider are relevant to Highways England and the operation of the strategic road network:

Modification MM/002 (Pages 10-11), (1.4 The 'Duty to Co-operate')
We note that this modification states: 0343/M/01/C

'Following the hearing sessions in May 2018, the Council proposed modifications to the Local Plan which brought the local plan housing supply closer to the identified OAN. However due to the outstanding shortfall and the existing position that no adjoining authority is able to assist Wyre I meeting unmet needs, the Local Plan includes a review mechanism in Policy LPR1 which commits the Council to an early partial review commencing in 2019 with submission of the review for examination in early 2022.'

Highways England Comment:
Highways England is supportive of the Inspector's suggestion that the new Local Plan be subject to early review. Given that a decision as to whether a Development Consent Order will be granted for Highways England's proposed A585 Windy Harbour to Skippool Bypass scheme is not expected until late 2019, the review affords an opportunity for the Council to have full certainty on the inclusion of the bypass scheme within its transport evidence. Highways England wishes to be involved with this process, and will be happy to assist the Council through the provision of knowledge and existing modelling information relating to the bypass scheme and the operation of the wider strategic road network within the area likely to be affected by the Local Plan.

It is important to note that, whilst Highways England wishes to be involved with the development of the Wyre Council's transport evidence for the Local Plan review, we believe that this work should be commissioned and led by Wyre Council with the involvement of both Highways England and other transport and infrastructure providers. In this way, a wider transport impacts and needs study is required as part of the evidence base for the Local Plan review. This study should consider all modes of transport for potential infrastructure solutions to support growth, and not just focus on seeing highways infrastructure as being the only answer without properly exploring any alternatives that could form part of a credible wider solution to increased transport demand associated with the Plan growth.

Where infrastructure needs are identified to facilitate the Council's full OAN growth requirements in a sustainable way, and where measures are not already within the committed programmes of the infrastructure providers concerned, the Council should take the lead in both identifying and promoting those solutions for delivery at the appropriate time within the lifetime of the Plan in consultation with the provider(s) concerned. Highways England would be happy to assist the Council in this regard from the perspective of being the operator of the strategic road network, which includes the A585, M55 and M6 motorways within the Wyre Borough area.

Modification MM/003, Pages 31 – 34, Local Plan Strategy 0343/M/02/C
We note that this modification states that:

'The Council has not based the strategy solely on the highways evidence albeit that was a major consideration. It has taken account of other evidence such as flood risk as well as the sustainability of different places. With regard to the latter the Local Plan includes specific requirements as part of allocations for the provision of infrastructure to support the scale of proposed development in different settlements.'

Furthermore:

'The Local Plan can deliver 9,285 dwellings or annually 464 dwellings within the local plan period 2011 – 2032. The Local Plan therefore delivers within the Local Plan period, nearly 97% of the OAN requirement.'

Highways England Comment:
We note that the planned housing and employment growth levels and distribution to be delivered during the Plan period is observed to be significant (equating to an increase of 1061 residential units, which equates to a rise of 11%). However, this increase is observed to be reasonable in the context of the requirement for the Council to increase its OAHN target for the plan period.

As set out above, from a transport and infrastructure planning perspective we advise that there is a need for a transport study to be undertaken as part of the early review of the Plan put forward by the Inspector. This should seek to establish an updated transport baseline (covering the A585 and M55 Junction 1 / A6 corridors). The additional planned growth further re-enforces the need for such review to take place to ensure the any infrastructure needs within our road network over and above those already within Highways England's programme are identified.

Modification MM/005, Page 38, Strategic Policies (Policy SP1 Development Strategy)
Highways England Comment: 0343/M/03/C
The proposed modification sets out the proposed amendments to the housing and employment distribution in line with the identified settlement hierarchy for the Borough.

A noteworthy observation is the reduction of 305 dwellings dispersed throughout the small rural settlements which is offset by a larger increase in the Urban Towns (146) and in Garstang itself (196 dwellings). The increase in Garstang is itself substantial due to existing issues associated with the cumulative level of proposed growth along the A6 corridor and the overall impact on the SRN itself (M6 Junction 33 and/or M55 Junction 1).

Although the A585 provides accessibility to the Urban Towns where an increase in both housing and employment has been proposed, the relatively small scale of development is unlikely to significantly impact the operation of the SRN due to the expectation of trips also being dispersed throughout the local road network.

Modification MM/011, Page 44, Strategic Policies (5.7 Viability and Policy SP6 Viability)
Proposed inclusion of the following to paragraph 5.7.3: 0343/M/04/C

'Although Policy SP6 aims to ensure that development is viable, there may be circumstances where a reduction in standards or infrastructure requirement may not be appropriate such as when severe impact on the transport network will be caused.'

Highways England Comment:
This inclusion is welcomed and, although vague regarding the specification of what would constitute such circumstances, the proposed amendment would enable development where impact assessment indicate a severe impact to be challenged appropriately in line with policy set out within the Local Plan.

Modification MM/036, Page 69, Economy (8.2 Employment Land Supply)
The proposed modifications are to update the employment land supply in the Borough in line with the latest information available from 31st March 2018.

0343/M/05/C

It is stated that:

'Losses of employment land have been factored into the requirement. However that does not include the loss of an additional 2 hectares from the allocated of Clarke House at Norcross for housing (Site A1/11). It is therefore taken off the supply.'

Highways England Comment:
The loss of 2ha of employment land, in which the development use class is not specified, is not observed to be of material significance to Highways England.

Modification MM/037, Page 69, Economy (Policy EP1 Employment Land Supply)
The proposed amendment reflects the reduction in 'B' employment use class development land across the identified sub-market areas, this is highlighted in the table below.

0343/M/06/C

Highways England Comment:
The reduction of employment land by 1.58 in the rural areas is not projected to have a noticeable impact on either the Local or Strategic Road Networks.

If you would like to discuss anything about this letter, please contact me.

Yours sincerely,

Warren Hilton
North West Asset Development Team
Email: warren.hilton@highwaysengland.co.uk