



MARCH, 2016

Saint Anne's on The Sea Neighbourhood Development Plan

STATEMENT OF CONSULTATION REPORT

Content

1. This statement provides a record of the consultation undertaken and responses received in relation to the publication of the Saint Anne's on The Sea Neighbourhood Development Plan, draft Submission January 2016, submitted by St. Anne's Town Council, for the purposes of progressing their Neighbourhood Development Plan to independent examination, referendum and adoption.
2. The consultation sought comments on the content of the Saint Anne's on The Sea Neighbourhood Development Plan (from hereon now referred to as the Plan) and supporting documents.

Regulation Requirements

3. St. Anne's Town Council formally commenced work on their Plan in 2013 following the approval of the Neighbourhood Area on 2 July 2013. The Plan was submitted by St. Anne's Town Council for the whole area of the Parish Council. Therefore in accordance with Section 61G of The Town and Country Planning Act 1990 (as amended by Localism Act 2011), the Town Council is considered the relevant body.
4. The Plan has been prepared by a Steering Group working on behalf of St. Anne's Town Council. During June and July 2015 the Pre-Submission version of the Plan was subject to a six week formal consultation (Regulation 14). Just 21 written representations were received and in general these comments were positive and supportive. Fylde Council's consultation response to the St Anne's Neighbourhood Development Plan was submitted to the Town Council on 30 July 2015.
5. From this exercise, further work on the Plan was undertaken by the Town Council, with input from various members of staff at Fylde Council, including a number of workshop events, to take account of those representations which were deemed appropriate by the Steering Group. The Submission Draft: January 2016 version of the Plan was then produced and formally received by Fylde Council on 25 January 2016. As part of that submission the following documents were also submitted, including:
 - Submission Neighbourhood Development Plan;
 - Design Guide;
 - Design Guide Companion Guide;
 - Basic Condition Statement;
 - Sustainability Report;
 - Neighbourhood Profile;
 - Report of Consultation;
 - Local Green Space Justification Report and Appendix 1 map;
 - Policies Map x 3; and
 - Delivery Strategy
6. Regulation 16, Part 5, of the Neighbourhood Planning (General) Regulations 2012 requires a local planning authority to publicise various documents on their website and bring the proposal to the attention of people who live, work or carry on business in the neighbourhood area. Regulations also require notification of any consultation body which is referred to in the consultation statement submitted in accordance with Regulation 15, that the Plan proposal has been received. Documents to be publicised include:
 - Details of the plan proposal;

- Details of where and when the Plan proposal may be inspected;
 - Details of how to make representations;
 - A statement that any representations may include a request to be notified of the local planning authority's decision under Regulation 19 in relation to the Neighbourhood Development Plan: and
 - The date by which those representations must be received, being not less than 6 weeks from the date on which the Plan proposal publicised.
7. In accordance with the requirements of Regulations 16, Fylde Council as the local planning authority published all the related Neighbourhood Development Plan documents as part of the Submission version for a six week public consultation, which started on Thursday 11 February, and ended on Thursday 24 March 2016.

Consultation process

8. Taking account of the requirements set out in Regulation 6 of the Neighbourhood Planning (General) Regulations 2012 and information contained in the council's Statement of Community Involvement, council officers have undertaken the following:
- Placed a notice in the Lytham St Annes Express on 11 February 2016 to advertise the consultation;
 - Displayed 29 site notices at key location around the parish, including key road and pedestrian routes into and out St Annes Parish;
 - Displayed information, on the four Parish notice boards located around the Parish;
 - Provided further information and the full submission details on the Council's Website.
9. A total of 217 consultees were notified of the submitted Plan, in accordance with Regulation 15, together with details of how long the consultation process was for, where to view the documentation and how to make a representation.
10. Representations could be made in writing using a representation form, completing the online survey or via email. Paper copies of the representation form were available for the community to collect from Fylde Direct, One Stop Shop.

Response and Comments

11. In total 29 responses were received as part of the consultation. Three on-line responses were incomplete and although attempts were made to contact the respondents inviting them to complete their submissions, they remained incomplete and as such have not been included in the consultation process. Responses were submitted by:

12.

List of Responses	Reference No.
Alicia Westoby	NP/SANP/16/02271
Balfour Beatty Investments Ltd	NP/SANP/16/02285
Chip Windscreens	NP/SANP/16/02289
David Lee	NP/SANP/16/02268
David Smith	NP/SANP/16/02270
Edward McHugh	NP/SANP/16/02269
Environment Agency	NP/SANP/16/02287

Fylde Borough Council - Estates	NP/SANP/16/02278
Fylde Borough Council - Planning	NP/SANP/16/02277
Fylde Coast YMCA	NP/SANP/16/02280
Highways England	NP/SANP/16/02263
Historic England	NP/SANP/16/02264
Ideal Corporate Solutions Ltd	NP/SANP/16/02288
John Bentham	NP/SANP/16/02274
John Nightingale	NP/SANP/16/02282
Lancashire County Council - Planning	NP/SANP/16/02284
Lancashire Enterprise Partnership Ltd.	NP/SANP/16/02279
Ministry of Defence	NP/SANP/16/02265
Natural England	NP/SANP/16/02290
Network Rail	NP/SANP/16/02266
Oyston Estates	NP/SANP/16/02286
Ronald Jones	NP/SANP/16/02262
Sally Taylor	NP/SANP/16/02273
Sarah Dunn	NP/SANP/16/02283
The Theatres Trust	NP/SANP/16/02272
Trams to Lytham	NP/SANP/16/02267
The Wildlife Trust	NP/SANP/16/02276
United Utilities	NP/SANP/16/02291
Victoria Holden	NP/SANP/16/02281

13. The list of respondents and a summary of their representations are provided in Appendix A. The method of response is provided below:

Method of response	Number
Online survey	12
Email (including electronic copy of representation form)	16
Representation form/Letter (paper copy)	1
Total	29

14. Highways England, Historic England, Network Rail, the Ministry of Defence, Trams to Lytham, the Theatre Trust, Fylde Council (Planning), United Utilities and the Wildlife Trust raised no objections to the proposed Neighbourhood Development Plan, other than a number of textual changes. The majority of the responses from members of the public are supportive of the plan with no specific comments or concerns raised. A full copy of the consultation comments will be provided to the Town Council to assist in their plan preparation.
15. A response from the Estates Department at Fylde Council raises concerns regarding the number of open spaces designated in the Plan as local green spaces, particularly the 18 areas in the ownership and care of the Fylde Council. The Lancashire Enterprise Partnership commented that reference and textual changes needed to be undertaken to stress the strategic significance of the Blackpool Enterprise Zone. The Fylde Coast YMCA are concerned with the wording of policy CH2 and the provision of community facilities as they consider that the policy is too restrictive and will not allow for new innovative designs for community facilities and would like the Town Council to bare this in mind.

16. The owners of Blackpool Airport (Balfour Beatty) are broadly supportive of the policies within the Neighbourhood Plan of relevance to the Airport. However, they requested that Policy SS1 is amended in order to ensure it meets the Basic Conditions required of a Neighbourhood Plan.
17. Natural England would like a couple of the proposed policies be more specific in regards to SPA birds and sites of biological and geological importance, as it considers the wording as it exists is too vague.
18. Two responses received from local residential developers, suggested that the NDP should make more reference to potential land capable for development within the parish due to the lack of a five year supply, to ensure the Plan is helping to facilitate the growth of the local economy in accordance with the Framework's pursuit of sustainable development.

Next steps

19. The representations received as part of the consultation will be reviewed assessed by officers as to whether there are any issues or unresolved objections which could prevent Fylde Council from submitting the Plan for Independent Examination. If there are any issues, then arrangements will be made to meet with the Town Council's Steering Group to discuss these outstanding concerns and discuss potential solutions to allow the Plan to progress.
20. Following the outcome of any discussions with the Town Council's Steering Group, if there are still any unresolved objections to the Plan, then Fylde Council may consider it appropriate to make additional comments, with the intention that these comments are passed on to the Independent Examiner, once appointed, to be read alongside Fylde Council's earlier comments and responses. It is however, in Fylde Council's own interests to assist St. Anne's Town Council Steering Group to develop a Neighbourhood Development Plan which is consistent with relevant policies in the emerging Local Plan to 2032, and is drafted in such a way that allows it to pass through the examination stage.
21. St. Anne's Town Council will be provided with a full copy of any relevant material which has come to light following the consultation.

Appendix A: List of Respondents and Summary of Comments

Consultee	Summary of Comment	Council Response
United Utilities	No objection	Comments noted.
Highways England	<p>Broadly supportive of the Plan.</p> <p>No specific comments to make other than that section 11.3.2 of the Neighbourhood Profile Report refers to the M55 to Heyhouses Link Road as being under the control of Highways England. For the purposes of avoiding any confusion, we would want to point out that the scheme is not a Highways England scheme - this is a local road scheme being progressed by Lancashire County Council in conjunction with Fylde Borough Council.</p>	<p>Comments noted.</p> <p>A copy of the response will be forwarded to the Town Council to assist them in progressing their Neighbourhood Development Plan to Publication version.</p>
Roland Jones	As a Director of Sandhurst Court, we wish to know of proposed developments.	<p>Comments noted.</p> <p>The Neighbourhood Plan if adopted will become part of the statutory plan for the area and be used in making decision on planning applications.</p>
Ministry of Defence	No objections to the Plan subject to no development being no higher than 91.4m above ground level.	<p>Comments noted.</p> <p>A copy of the response will be forwarded to the Town Council to assist them in progressing their Neighbourhood Development Plan to Publication version.</p>
Historic England	No objection.	A copy of the response will be forwarded to the Town Council to assist in progressing the Neighbourhood Plan.
Network Rail	<p>Thank you for the opportunity to provide feedback to the proposed policy.</p> <p>Network Rail is the public owner and operator of Britain's railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations - the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.</p> <p>We would request that the St Anne's on Sea Neighbourhood Development Plan authority / group when submitting proposals for a development contact Network Rail's Town Planning Team and include a location plan and a description of the works taking place for review and comment.</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to assist in progressing their Neighbourhood Development Plan.</p>

Trams to Lytham	<p>At Trams to Lytham we believe passionately that the Blackpool Tramway can and must have a greater role in the overall transport plan for the Fylde Coast, delivering the network the region deserves and so badly needs to become an integral part of the 'Northern Powerhouse'. The South Fylde railway line has become mediocre at best in recent years, and has seen years of continuous under-investment. South Fylde deserves better than the unacceptable hourly service with dilapidated rolling stock. Reliability and customer satisfaction must also be drastically improved.</p> <p>We want to provide a new and innovative transport solution that will be for the best of the people of the Fylde Coast, and we need the support of other local groups, influential figures and the general public if we are to convince local and/or national government to take this project forward.</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to assist in progressing their Neighbourhood Development Plan.</p>
David Lee	<p>The policy statement by the Council to maintain the original vision of the town as a "garden town by the sea" is strongly supported.</p> <p>For this reason, the current trend of converting the front gardens of domestic residences should be discouraged. Perhaps this could be achieved by the imposition of a financial levy on future conversions, the proceeds from which could be used for replacement street trees.</p>	<p>A copy of the response will be forwarded to the Town Council to assist them in progressing their Neighbourhood Development Plan to Publication version.</p>
David Smith	<p>Support the Plan Have been campaigning for the tramway to be extended to St Annes/Lytham for years, and strongly support the intensions of the 'Trams to Lytham' group. I sincerely hope the benefits of a pure tram link are finally realised and we don't just get a passing loop or tram trains.</p>	<p>A copy of the response will be forwarded to the Town Council to assist them in progressing their Neighbourhood Development Plan to Publication version.</p>
Edward McHugh	<p>Support the Plan</p> <p>An extension of the tramway to St Anne's would be a great benefit to the community and area as a whole</p>	<p>A copy of the response will be forwarded to the Town Council to assist them in progressing their Neighbourhood Development Plan to Publication version.</p>
Alicia Westoby	<p>Fully supports the Plan</p>	<p>Comment noted</p>
The Theatres Trust	<p>The Theatres Trust is pleased to see, and supports, the inclusion of policies CH1 and CH2 which aim to encourage and safeguard community facilities, including theatres, which are essential for the cultural and social well-being of the local community.</p> <p>The policies reflect item 70 of the National Planning Policy Framework which states that to deliver the social, recreational and cultural facilities and services</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to assist in progressing their Neighbourhood Development Plan.</p>

	<p>that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.</p>	
Sally Taylor	<p>Supports the Plan</p> <p>These documents are essential if St Anne's wished to protect parks, woodlands and open spaces.</p> <p>The design guide is an interesting concept and will drive up the quality of the build within the town.</p> <p>More trees are always welcome, as are the enhanced gateways.</p>	Comments noted.
John Bentham	<p>I support the idea that St Annes ought to separate itself from the view of Fylde Borough Council, whilst it is good conduct, It is not the kind of thing that will be got through the scheme. I therefore support the scheme in its entirety.</p>	Comments noted.
The Wildlife Trust	<p>No objection but various comments and suggested textual changes.</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>
Fylde Borough Council – Planning & Regeneration Department	<p>No objections in general to the Plan. However, there are a number of comments and proposed textual changes suggested.</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>
Fylde Borough Council – Estates Department	<p>Concerned over the designation of so many open space areas as green spaces, especially the 18 identified by the Town Council which are owned by Fylde Borough Council.</p> <p>Overall it is considered that the designation of open spaces as local green space is inappropriate and unnecessary, which could make it difficult to carry out improvements to these open spaces.</p> <p>The council does not consider that the Town Council have applied the principle of local green spaces correctly.</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>

	<p>An amendment to the Ashton Gardens designation needs to be applied as it includes the depot which is occasionally necessary and does not detract from the amenity of Ashton Gardens as a whole and requires the occasional development.</p>	
Lancashire Enterprise Partnership Ltd.	<p>Comment that the strategic significance of the Blackpool Airport Corridor Enterprise Zone (EZ) should be acknowledged in the Plan.</p> <p>Policy SS1: Blackpool Airport – should be re-titled Blackpool Airport Enterprise Zone – and the developing Masterplan for the site should be referred to.</p> <p>Policy DH2: Corridors and Gateways: b-Blackpool Airport Corridor improvement area should be reworded to reflect that the road corridor needs to be considered in the wider context of the EZ.</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>
Sarah Dunn	<p>Supports the Plan</p> <p>It is vital that our local green spaces are protected from development.</p>	Comments noted.
John Nightingale	<p>Supports the Plan</p> <p>Garden Town by the Sea is a lovely phrase and it would be the ideal with we could gradually develop St Annes to reflect that vision. In particular I agree with the sentiment of attempting to protect existing green space.</p>	Comments noted.
Victoria Holden	<p>Supports the Plan</p> <p>Supports the plans efforts to preserve the green space we actually still have. It is entirely misleading of Fylde Council to quote their policy, TREC13, as "protection" for any of our town's green spaces; this hateful policy permits land to be developed provided that alternative land is provided - but this does nothing to protect the immediate local environment in which the lost green space is situated or the quality of life of its inhabitants, and merely results in a loss of green space elsewhere.</p> <p>A "Garden Town by the Sea" is what we currently have - however this will be lost forever if our gardens are permitted to be developed.</p>	Comments noted.
Fylde Coast YMCA	<p>Policy CH2: Community facilities</p> <p>The insistence on development resulting in a loss of any building or land</p>	Comments noted.

	<p>currently used as a community only being permitted where either criteria a) or b) is met could stifle new and innovative provision of future community facilities.</p> <p>Consideration should be given to a development also being granted on the basis that it facilitates the creation of new community facilities whilst enhancing future sustainability of such provision.</p>	<p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>
<p>Lancashire County Council – Strategy and Policy</p>	<p>LCC are supportive of the Neighbourhood Plan and the broad themes and policy direction that the Neighbourhood Plan covers including environment, community and health, economy and sustainability. These complement the Lancashire County Council's core objectives expressed through its emerging Corporate Strategy and supporting policy documents. In addition, the general principles and strategic issues are also aligned with the County Council's Highways and Transport Masterplan for the Fylde Coast, specifically; improving gateways to the town, including the M55 to Heyhouses Link road, providing green infrastructure and improving the economy.</p> <p>However, further improvements could be made in order to bring better consistency and clarity in this respect.</p> <p><u>Blackpool Airport Corridor Enterprise Zone</u> Enterprise Zone (EZ) status has now been confirmed on the site and will come into effect in April 2016. The EZ is a national designation and forms part of a suite of 4 EZ sites in Lancashire each with a particular sector focus. Planning permission for the Lancashire Energy HQ has already been granted for the site. The Government has referred to the EZ in terms of the Northern Powerhouse and it is a key part of economic plans for Lancashire and the Fylde Coast. The strategic significance of the EZ should be acknowledged in the Plan.</p> <p><u>Schools Planning</u> Regarding school planning, please note that it would be beneficial to see Education Provision as a heading within P16-17 Chapter 4: Key Issues - Summary of key issues. We would also like to see mention of education provision on P18-19 Chapter 5: The objectives and vision of the Neighbourhood Plan in the 'what we aim to achieve' section.</p> <p><u>County Council's Estate</u> LCC is in the process of rationalising its property portfolio and is conducting a review of 220 public facing properties. The Neighbourhood Centre review will</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>

	<p>reduce 220 properties by half and whilst that is ongoing it is difficult to provide detailed comments until the decisions are made regarding the properties that will be retained long term. Once decisions are made there will be a number of properties that will not be required in the future. On the basis that Lancashire County Council's public facing service provision will be re-provided in the newly formed Neighbourhood Centres it is anticipated that the requirements of policy CH2 (a) will have been achieved and Lancashire County Council will be in a position to re-use or dispose of the surplus properties as they see fit.</p> <p><u>Minerals Extraction</u></p> <p>The Borough Council will need to satisfy itself that the need for development outweighs the need to prevent the possible sterilisation of a possible mineral resource at some point in the future.</p>	
<p>Nathaniel Lichfield & Partners on behalf of their clients: Balfour Beatty Investments Ltd</p>	<p>Overall, Blackpool Airport is broadly supportive of the policies within the Neighbourhood Plan of relevance to the Airport. In light of the recent material change in circumstances brought about by the granting of Enterprise Zone status to the Airport, however, we request that Policy SS1 is amended in order to ensure it meets the Basic Conditions required of a Neighbourhood Plan. In particular, the changes set out above will bring the NDP into closer conformity with national policy, legislation and advice, and also help to facilitate the growth of the local economy in accordance with the Framework's pursuit of sustainable development.</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>
<p>Cassidy & Ashton on behalf of their clients: Oyston Estates</p>	<p>In terms of proposed housing sites, the policies map which accompanies the NDP identifies a number of 'committed major housing sites' which already benefit from planning permission. No other proposed sites have been allocated for housing, despite the fact that Fylde Borough does not have a 5 year housing land supply and that these sites are already contained within the supply figures. The NPPF is clear that Local Planning Authorities must demonstrate a 5 year supply of deliverable housing sites and that they need to maintain the 5 year supply of housing land to meet their target. The NDP is not a positive approach to meeting housing targets and the housing land identified is disproportionately low given that Lytham St Annes is the largest settlement in Fylde.</p> <p><u>Potential Sites</u></p> <p>Policy EN1 seeks the protection of sites of biological and geological conservation importance. However, the policy should not be used as a tool to restrict the sustainable growth of St Annes, where sites are available and</p>	<p>Comments noted.</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>

	<p>deliverable and would not have adverse environmental impacts.</p> <p>Conclusions The Town Council needs to plan proactively for growth, rather than produce a Neighbourhood Development Plan that would seek to prevent sustainable development and would hinder Fylde Borough Council's requirement to identify and maintain a five year housing land supply. The NDP as it stands would not fulfil its purpose of '<i>protecting the town from uncoordinated and speculative development</i>' but would ultimately worsen the situation.</p> <p>Accordingly, the St Anne's on the Sea Neighbourhood Development Plan Submission Draft: January 2016' is not compliant with the National Planning Policy Framework or the Development Plan and does not take into account the evidence base of the emerging Local Plan, such as the SHLAA (2015).</p>	
Environment Agency	<p>Thank you for consulting us on the above NDP.</p> <p>We have reviewed the information submitted and we have the following comments to make:-</p> <p>We support the St. Anne's on the Sea NDP and consider that it and the supporting documents are sound insofar as it relates to our remit.</p> <p>Although, we note that some policies have been altered or removed (such as ENV8: Lytham Moss), we are satisfied that flooding risk, bathing waters, climate change and green infrastructure have been adequately identified and addressed. This will help contribute to the sustainable development of the area by protecting and enhancing the environment for people and wildlife.</p>	Comments noted
Emery Planning on behalf of their clients: Ideal Corporate Solutions Ltd.	<p>Emery Planning have submitted a large document in regards to Representations to St Anne's Neighbourhood Plan - Submission Draft</p> <p>On behalf of their client: Ideal Corporate Solutions Ltd - Liquidators of Rushcliffe Properties Limited.</p> <p>EP Project Ref: SANPR1 - 9336</p>	<p>Comments noted</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>
Chip Windscreens	Support the Plan	Comments noted

	Blackpool Airport is a Fylde coast asset and must be protected.	
Natural England	<p>Natural England have the following comments;</p> <p>C032 ENV: Environment –general comments R20: Natural England Overall the policies in the plan are quite broad and lack detail. More detail should be included in the policies with a robust and detailed supporting text. For example with the environmental policy,</p> <p>ENV1: Protection of sites of biological and geological conservation importance is too vague. This policy needs to clearly state that biodiversity will be protected and enhanced in accordance with paragraphs 109 to 125 of the National Planning Policy Framework (NPPF).</p> <p>ENV: Environment –R20: Natural England Although previous comments were noted there are no changes, there is still no mention of SPA birds in the latest iteration of the plan. We would also like to reiterate a point made in the same referenced response above, any policy in the Neighbourhood Plan relating to the Nature Reserve would need to ensure absolute compliance with the conditions and planning obligations of the Queensway development.</p>	<p>Comments noted</p> <p>A copy of the full response will be forwarded to the Town Council to enable them to make any necessary amendments and additions to assist in progressing their Neighbourhood Development Plan.</p>