Fylde Local Plan to 2030: Part 1 - Preferred Options consultation

RESPONSES REPORT

Consultation Statement:

1. Section A: Summary of Consultation
2. Section B: Summary of comments received and the Council response

July 2014
Section A: Summary of Consultation

The Preferred Options consultation took place over eight weeks between Thursday 27th June and Thursday 22nd August 2013, and was the fourth consultation on the Local Plan. The consultation took place in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations, 2012.

This part of the consultation statement provides an overview of the consultation, setting out the consultation material that was used, who and how the Council consulted, how comments received have been considered and an evaluation of the consultation. Section B provides a summary of the comments received, how the Council has responded, and also an indication of how the Publication document could develop in relation to the comments.

Background

The Fylde Local Plan to 2030 (Part 1) – Preferred Options is the first of two development plan documents that will make up the Fylde Local Plan to 2030.

The Preferred Options for the Local Plan (Part 1) set out the preferred policies on housing, employment, the environment and other matters and proposed strategic development sites as part of strategic locations for development. The second part of the Local Plan will be the Local Plan Part 2: Site Allocations to 2030, which will include smaller development sites in the urban and rural areas and define employment areas, areas of public open space and town centre boundaries.

The Local Plan (Part 1) Preferred Options document has been written to address the key policy issues of the borough, and has been informed by the results of the ‘Issues and Options’ public consultation undertaken in June / July 2012 and the ‘Issues, Vision and Objectives’ public consultation undertaken in February / March 2011.

The next stage after Preferred Options will be the preparation of the revised Preferred Option document, followed after consultation by the preparation of the Publication version, followed by the Submission document, which will be submitted to the Secretary of State. The Plan will then be examined by an independent Planning Inspector into the ‘soundness’ of its policies before adoption by Fylde Council.

Consultation material

The Local Plan (Part 1) Preferred Options consultation document was produced for comment.

Flyers and posters were produced to advertise the consultation which were displayed at various locations around the borough, including shops and parish notice boards.

A booklet was produced which summarised the strategic development locations and strategic sites and set out some of the key preferred policy options. It was handed out to people attending the consultation events.

The two generic banners used during last year’s ‘Issues and Options’ consultation were used for the consultation events at the venues. In addition, material for display boards was produced for use at the consultation events at the venues, and this included maps of the four strategic development locations with strategic sites and information detailing each of the preferred strategic options.

A CD containing the consultation document and other relevant technical documents were available for individuals to take away. This was particularly useful if people had poor or no internet connections, this is common in rural Fylde.
The Council encouraged respondents to make comments using the online Planning Policy consultation system. Comments could also be submitted on a paper or electronic representation form and returned via freepost or email.

Who was consulted?

Letters were sent to the consultation bodies set out in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which the Council is required to consult under Regulation 18. These bodies are contained on the Council's Register of Consultees. Other relevant bodies and individuals who are registered on the Council's Register of Consultees were notified. The Register of Consultees is updated regularly to take account of requests received from consultants, organisations, residents and other parties to be informed of future consultations.

How the community was involved

The following methods were used to involve the community.

Letters and emails

Letters or emails were sent out to all the addresses contained in the Register of Consultees advising of the consultation and inviting comments.

Consultation events

Consultation events were held at nine venues around the borough to allow the general public and others to view the Preferred Options and speak with officers.

The events commenced from the 1st July 2013 and were held at St Annes, Lytham, Kirkham, Wesham, Warton, Elswick, Staining, Fylde-Blackpool Periphery (Marton) and Westby.

The events were ‘drop ins’ and they ran from 3.00 pm – 7.00 pm to allow as many people as possible to attend.

The locations of the events were chosen to correspond with the four strategic locations for development and one in the north of the borough (Elswick). Following the Local Plan Steering Group’s request, Councillors, Parish Councils and Ward members were consulted on the choice of venues and given two weeks to respond. In response to this consultation, Staining Parish Council requested a drop-in event at Staining. An event for Westby area was also requested by Cllr Brickles and held at Ballam.

Venues were used for the events as a high turnout was expected. At the Issues and Options consultation a mix of venues and the Council’s consultation vehicle were used.

The venue in Staining was different to that used during the Issues and Options consultation to provide a more central location within the village, following feedback received about the venue at the Issues and Options consultation.

The two generic pop-up banners from the Issues and Options consultation were used at the venues, and large scale maps and supporting text was produced for the display boards. Summary booklets were available at the venue for individuals to take away and reference copies of the consultation document and supporting technical assessments were available.

Electronic methods

A prominent notice on the Councils home webpage highlighted the consultation and invited comments.
A dedicated webpage for the Consultation was established, containing information on the consultation events and consultation material. A link to the Council’s Planning Policy Consultation system allowed users to register to view the consultation document and submit representations against the relevant section. The consultation system allows users to view other consultees comments once they have been checked by the Council.

The Council’s online forum, Twitter and Facebook pages were not used to collect comments due to the poor response from these methods during the Issues, Vision and Objectives consultation.

Media

Statutory press notices were inserted into the Lytham St Annes Express in the edition of 27th June 2013 and 4th July 2013.

A press release was issued on 27th June 2013.

Flyers and posters

Flyers and posters were produced to advertise the consultation and were displayed at various locations around the borough, including shops and parish notice boards.

Councillors

Councillors and parish councillors were informed of the consultation, and were also invited to a Local Plan open session in the Town Hall foyer on 26th June between 2.00 pm and 6.00 pm to view and discuss the preferred options with planning officers before the consultation. A copy of the consultation document was available for each councillor and a copy was provided to each Parish Council.

Council staff

Before the consultation, a ‘pre-consultation’ took place with key Council officers. A draft of the Preferred Options consultation document was sent to these officers for comments, and these comments were used to amend the document before consultation.

Council officers were informed of the consultation, and were also invited to a Local Plan open session in the Town Hall foyer on 26th June between 2.00 pm and 6.00 pm to view and discuss the preferred options with planning officers before the consultation.

Council staff were informed through the Council’s intranet and emails were sent to Heads of Service. There was also an article in the Council’s staff newsletter in the June edition. The Council’s Management team were briefed by the Head of Planning and Regeneration.

Libraries

The consultation document and other consultation material were deposited at all the borough’s libraries.

Warton Armed Forces Day

A Planning officer attended the Warton Armed Forces Day in Warton village on Saturday 29th June 2013 in order to promote the Preferred Options and was able to talk to members of the public about the consultation.
Consideration of comments received

In total there were 691 respondents to the consultation who submitted 2,644 representations. Of these, 40 responded used the online planning policy consultation system, 94 emailed their comments and 557 posted their comments. All representations received were acknowledged and summarised into the Planning Policy consultation database, divided by chapter, policy and/or paragraph. The representations were published online via the online consultation database.

A list of respondents who made representations on the Fylde Local Plan Preferred Options is available in appendix A in this report.

Part B of this Statement of Consultation provides a summary of the representations received, along with the Council’s response to the representations and an outline of considerations for the Publication document.

The consultation web page and questionnaire stated that respondents’ contact details must be provided for responses to be considered. This helps to prevent multiple responses from the same individual or organisation, and it also allows the respondent to be contacted if a need arises to clarify any comments. Some respondents to the consultation did not include their contact details. Therefore, these responses have not been considered.

Consultation Evaluation

Levels of attendance at the consultation events varied. Warton, Kirkham and Wesham were particularly well attended, whilst the event in Staining had a very low attendance. Many responses were received from Warton, Kirkham and Wesham residents.

The Council received a number of comments in relation to the consultation exercise:

Formal Presentation

Treales, Roseacre and Wharles Parish Council suggested there should have been a formal presentation of the proposed option in the same way as conducted for the original 5 options offered in previous consultations.

The Preferred Options Consultation followed a similar format to the previous consultation exercises undertaken at the Issues and Options and Issues, Vision and Objectives stages.

Length of the consultation document

Some residents commented on the excessive length of the consultation document and associated technical documents.

Given the remit of the Plan in setting out how the borough should be developed in the future, along with the substantial amount of evidence needed to support this, it was not possible to produce a short Preferred Options consultation document, particularly given that the document includes both spatial options and development management policies. The Preferred Options consultation document was deliberately written and formatted in a way that made it concise and user friendly with colour, graphics and photographs. In addition, for those who found the document too unwieldy, an 8 page summary leaflet was produced which summarised the key Preferred Spatial and Policy Options.
Online consultation system

Respondents commented on the difficulties they encounter using the online consultation system and how time consuming the software is.

The Council has been developing the online consultation software and the Preferred Options was the first time the Council had used the software to receive consultation comments. Alongside the Preferred Options consultation, the Council sought feedback on the consultation software. The Council is aware of a number of problems and the consultation system feedback will be used to improve the system. To date, a number of issues have been resolved by the software provider to make the system more user friendly.

Representation form

Some respondents commented that the representation form was too complex and complicated.

The representation form was structured to encourage respondents to provide information and evidence in support of their comments.

The consultation sought comments on the whole document. However, it is appreciated that some respondents may only wish to comment on a specific policy, chapter or paragraph. The representation form was designed to ensure that respondents would identify which part of the plan they were responding to. This is important for processing the comments, and ensures that the Council attributes comments to the correct section of the document when processing them.

Consultation events

Some respondents were concerned that Council officers at the consultation events did not write down their comments and this would not be fed into the consultation process.

The purpose of the consultation events was to allow the community to discuss the Preferred Option and ask questions. As part of developing the Local Plan, the Council has to provide an audit trial and the community were encouraged to submit their comments in writing. This also prevents officers misinterpreting the verbal comments provide at the consultation events.

A prominent notice was displayed on all consultation material offering further assistance in formulating and submitting consultation comments, in accordance with the Council’s Statement of Community Involvement (2011).

Length of consultation

Some respondents commented that a six week consultation period was insufficient.

The minimum period for statutory consultations on the Local Plan is six weeks. The Council considers eight weeks for consultation to be adequate. The Preferred Options consultation was an informal consultation as part of ‘continuous engagement’ rather than a statutory consultation.

Full Council

The Preferred Options document was agreed for consultation at a Special Meeting of the Council on 12th June 2013.

Consultation Summary

Overall, the comments received during the consultation were informative in determining the views of the public and stakeholders in relation to the Preferred Options. The comments also highlight other important considerations that will be taken account of in developing the next version of the Local Plan (Part 1).
Consultation Statement - Section B: Summary of comments received and the Council response

This report is structured in parallel to the chapters in the Fylde Local Plan to 2030: Part 1 - Preferred Options consultation document.

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Chapter 1: Introduction

Number of representations:

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Representations received from:

- Environment Agency
- English Heritage
- Home Builders Federation
- Campaign to Protect Rural England (CPRE) – Fylde District
- BAE Systems Real Estate Solutions
- Ribby with Wrea Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- Councillor Eastham
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Lancashire County Council
- AXA Insurance
- 7 Residents
- Residents of Mythop Road
- 3 Residential Developers

What you said

AXA Insurance suggested that the Local Plan should be seen as an opportunity to bring sustainable development which can support those living and working in Fylde.

BAE Systems Real Estate Solutions agreed with the majority of the principles listed in paragraph 1.2, but that the paragraph should be more explicit about the delivery of the principles. They suggested the following amended wording:

- Delivering sustainable development;
- Stimulating economic and housing growth and its associated infrastructure;
- Spatial planning and ensuring a deliverable supply of land to ensure the growth above;
- Addressing climate change through design and energy management;
- Creating high quality developments through inclusive and accessible design principles;
- Involving the community through innovative engagement techniques and the neighbourhood planning process.

Cllr Eastham said that paragraphs 1.4 and 1.20 should clearly explain the infrastructure that will be required to deliver the Vision. The Cllr also commented that paragraph 1.8 should more clearly define what changes will be reflected by the Policies Map.

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1 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
A residential developer claimed that the Council needs to fully satisfy the requirements of the Duty to Co-operate and to publicise what steps have been taken to achieve this.

In relation to the production of the Local Plan, some residents considered that there has been little public consultation across the Fylde before the Local Plan was published. The residents also claimed that a substantial number of the Full Council refused to endorse the Plan; that the MP for Fylde regards the numbers used by the Council to be too high; that the Portfolio Holder has said that Warton does not need the number of new homes put forward in the Plan; that 8 weeks for the consultation is inadequate; that the Council will not take account of the comments made during consultation; that the Council will not make any changes even when the assumptions to support the Local Plan alter; and that the previous consultation was inadequately advertised.

A resident suggested that the Introduction, along with the rest of the document, contains much that is misleading or untrue. The resident added that paragraph 1.16 suggests that the Preferred Options take account of the earlier Issues and Options consultation. However, the resident claimed that both the ‘Issues and Options’ and ‘Preferred Options’ consultations were both ineffective and the Preferred Options document has not taken account of previous consultation responses.

The Minority Group commented that none of the options put forward at the Issues and Options stage have been taken forward, option 5 was the most popular option but this has not been taken forward.

In relation to the ‘Issues and Options’ section, some residents said that Warton is identified as a strategic location in the Local Plan – ‘Preferred Options’, but not in the previous ‘Issues and Options’ stage. The residents also claimed that the results of the Issues and Options consultation are heavily influenced by large scale commercial organisations who would gain from the provision of so much housing within Warton.

With regard to paragraph 1.18. English Heritage considered that the published evidence base available on the Council’s website lacks sufficient evidence that relates to the historic environment, such as Conservation Area Appraisals.

A residential developer suggested that other key parts of the evidence base are absent, particularly in relation to a proper objective assessment of the need for housing; and an assessment of economic viability of the cumulative impact of planning policies on viability and deliverability. They added that the production of key elements of the evidence base later in the process is undesirable and may require fundamental changes to the Plan.

The Environment Agency recommended including the Level 1 Strategic Flood Risk Assessment in the list of technical assessments undertaken to accompany the Local Plan. The Home Builders Federation said that the Council should have regard to the 2012 Local Housing Delivery Group guidance on ‘Viability Testing of Local Plans.’ They also said that they encourage the Council to involve members of the local development industry, adding that these will often be able to provide realistic views of the local market and development costs.

Lancashire County Council welcomed reference to the Lancashire Minerals and Waste Local Plan. They added that the final version of the Local Plan should clearly make reference to Mineral Safeguarding Areas and the requirements of policy M2 of the Lancashire Minerals and Waste Local Plan against relevant allocations. One response stated that part of site M2 of the Fylde Local Plan – Preferred Options (Whyndyke Farm) is peat.

The Environment Agency claimed that they support reference to shale gas activities in the district. Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors said that whilst shale gas exploration and extraction (‘fracking’) is the responsibility of Lancashire County Council (in its role as the Mineral Planning Authority), the implications for Fylde could be huge. He therefore considered that more needs to be said about this topic in the Local Plan. Several other respondents also claimed that there was very little mention of shale gas exploration and extraction (‘fracking’), and a respondent said that there is no mention about the effects on Fylde’s future. Ribby with Wrea Parish Council claimed that shale gas
exploration and extraction should be given more priority in the Local Plan. CPRE – Fylde District added that shale gas exploration and extraction will necessitate significant strategic infrastructure, most of which fall within the scope of Fylde as the local planning authority. CPRE – Fylde District also considered that there should be strong policies in the Local Plan to protect existing settlements and the open countryside, whilst gaining from employment and infrastructure. Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors made reference to potential impacts on bathing water quality. A respondent claimed that the health impacts of shale gas exploration and extraction should be considered in the Local Plan.

Council response

The Council agrees that the Local Plan is an opportunity to bring sustainable development which can support those living and working in Fylde.

The Council agrees to amend and expand the Local Plan principles listed in paragraph 1.2 to read:

- Delivering sustainable development;
- Stimulating economic and housing growth and its associated infrastructure;
- Addressing climate change;
- Creating high quality developments;
- Good accessibility;
- Community involvement and engagement.

The forthcoming viability assessment of the Local Plan – Preferred Options document has taken account of the 2012 Local Housing Delivery Group guidance on 'Viability Testing of Local Plans.'

Where appropriate, the Council will consider involving members of the local development industry when preparing evidence to support the Local Plan.

The Council does not agree that the Introduction should explain the infrastructure that will be required to deliver the Vision. Evidence gathered so far has been summarised in the supporting draft Infrastructure Delivery Plan and chapters 7 and 12 of the Local Plan – Preferred Options document.

The Council will continue to satisfy the requirements of the Duty to Co-operate and will publicise the steps that have been taken to achieve this in the Authority Monitoring Report (AMR).

The Council will prepare a Policies Map, which will accompany the Publication version of the Local Plan. The Council is in the process of identifying the significant changes and allocations that should be identified on the Policies Map.

In terms of the production of the Local Plan, there has been extensive consultation on the Local Plan during its preparation. Details of the consultation methods used by the Council for the Preferred Options consultation can be found at the start of this report. Details of the methods used for previous consultations can be found on the Council’s website via the following link: [http://www.fylde.gov.uk/council/planning-policy-local-plan-local-development-framework/local-plan-to-2030-consultations/](http://www.fylde.gov.uk/council/planning-policy-local-plan-local-development-framework/local-plan-to-2030-consultations/). The Council’s housing figure will be supported by a robust evidence base, principally the findings of the Fylde Coast Strategic Housing Market Assessment (SHMA), which was published in June 2014.

The minimum period for statutory consultations on the Local Plan is six weeks. The Council considers eight weeks for consultation to be adequate. The Preferred Options consultation was an informal consultation as part of ‘continuous engagement’ rather than a statutory consultation.

The Council has considered all comments received during the consultation exercise and will make amendments to the Local Plan as appropriate. This included comments from a range of individuals, groups and organisations. However, the Council also needs to consider the evidence base that supports the Local
Plan, along with government policies and other strategies and guidance. All these aspects need to be considered as the Council develops the Local Plan.

The Local Plan – Issues and Options document set out five spatial options for the distribution of future development. It is correct that none of these options identified the proportion of development at Warton as set out in the ‘Preferred Options’. However, at the Issues and Options stage the Council asked for views as to whether there are any further options for development in the Borough. In addition, some respondents claimed that when considering options for the location of development, the Enterprise Zone at BAE Systems, Warton should be considered, along with linkages and accessibility to Preston. This includes the implications for wider connectivity in Fylde, consideration of strategic development in North West Preston, together with the key transport infrastructure improvements that will be required to enable this to take place.

In considering the Preferred Options, the Council has taken feedback on the alternative options and the findings of the Interim Sustainability Appraisal. Taking these and further discussions with infrastructure providers on board, the Council concluded that none of the five alternative options individually provided a preferred option for the future development in Fylde. Therefore, the Council proposed the spatial development framework set out in the Local Plan – Preferred Options document.

In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be done. The Heritage Strategy sets out a strategic framework for future heritage works streams, including a statement of intent to undertake conservation area appraisals and management plans where relevant.

In terms of other evidence, the Viability Assessment of the Local Plan – Preferred Options document is summarised in the appendices of this consultation statement. The Fylde Coast Strategic Housing Market Assessment (SHMA) was published in June 2014 and contains the most realistic population projections for the Borough, which will be used in the next version of the Local Plan (Part 1).

The list of technical assessments in paragraph 1.19 are assessments of the Local Plan – Preferred Options document. Therefore, the Council did not consider it appropriate to include the Level 1 Strategic Flood Risk Assessment in this list.

In its draft form, policy M2 of the Lancashire Minerals and Waste Site Allocations and Development Management Development Plan Document identified peat as one of a number of safeguarded minerals, and areas of peat were included in the draft Minerals Safeguarding Area maps. However, during the Examination in Public, the Inspector questioned whether peat was a mineral in light of the publication of the National Planning Policy Framework (NPPF). Following the publication of the Inspector’s report into the Minerals and Waste Local Plan, peat has been removed from the adopted policy and the maps. Consequently, the Minerals and Waste Local Plan no longer refers to peat deposits and peat is no longer safeguarded as a mineral. As a result, the Fylde Local Plan – Part 1 does not need to refer to the requirements of policy M2 in terms of safeguarding peat deposits.

The Council considers that there is no need for more emphasis to be placed on shale gas exploration and extraction (‘fracking’) in the Local Plan, as this is dealt with by Lancashire County Council, as the Mineral Planning Authority. Any infrastructure requirements for shale gas exploration and extraction will be included in planning applications submitted to the County Council. Fylde Borough Council will be consulted by the County Council on planning applications for shale gas exploration and extraction. The Council agrees to make reference to the emerging shale gas exploration and extraction supplementary planning document in chapter 1. The Local Plan Part 1 has not planned for shale gas, as it is too early to factor in, it is not known if it is economically viable. If it takes off economically, the Council will undertake a further review.
Recommendations for change

- Amend paragraph 1.2 of the Preferred Options to read:
  "Delivering sustainable development;
  Stimulating economic and housing growth and its associated infrastructure;
  Addressing climate change;
  Creating high quality developments;
  Good accessibility;
  Community involvement and engagement".

- Insert a new paragraph after paragraph 1.4 of the Preferred Options to read: "The Fylde Local Plan Part 1 which runs from 1st April 2011 to 31st March 2030, needs to be read as a whole and every policy and justification should be considered alongside all of the other policies and balance needs to be made when considering planning applications".

- Amend text in paragraph 1.5 of the Preferred Options to read “… the Fylde Coast sub-region …”

- Prepare a Policies Map, which will accompany the Publication version of the Local Plan (Part 1).

- Amend paragraph 1.24 of the Preferred Options to read: “Mineral Safeguarding Areas are included within the adopted Lancashire Minerals and Waste Local Plan” and delete the remaining text in the paragraph as it is now no longer required.

- Amend paragraph 1.25 of the Preferred Options by deleting criterion g): “In the case of peat deposits, that it no longer serves as a carbon sink”.

- Amend paragraph 1.27 of the Preferred Options by deleting the second sentence: "With regard to the peat deposits, site surveys should consider the extent, depth and condition of the reserves and what contribution or potential contribution they could make in terms of carbon sink”.

- Amend paragraph 1.28 of the Preferred Options by deleting the words “Peat and” from the text. The sentence should read: “The following map shows where Mineral Safeguarding Areas are identified within Fylde”.

- Amend paragraph 1.30 of the Preferred Options to include a reference to the shale gas exploration and extraction supplementary planning document, which is being prepared by Lancashire County Council in its role as the Mineral Planning Authority.

- Insert an updated copy of the Mineral Safeguarding Areas map on page 13 of the Preferred Options, precluding ‘Peat Safeguarding Areas’. Add "Figure 1" to the title of “Mineral Safeguarding Areas” map on page 13.
Chapter 2: Spatial Portrait of Fylde

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<td>23</td>
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Representations received from:

- English Heritage
- Lancashire Wildlife Trust
- United Utilities
- National Farmers Union
- BAE Systems Real Estate Solutions
- Councillor Eastham
- Blackpool Council
- Treales, Roseacre and Wharles Parish Council
- Lytham St Annes Civic Society
- 17 residents

What you said

Fylde Borough

Population growth
Cllr Eastham suggested that the estimated population growth in Fylde of “15.3%” between 2010 and 2035 should be checked for accuracy.

Heritage
English Heritage claimed that the overall spatial portrait makes no reference to the built heritage of the Borough. They also considered that the chapter would benefit from a proper, accurate assessment of the significance of the heritage assets in the area and the contribution they make to the Borough. They suggested that more needs to be said about heritage assets for each strategic location in this chapter.

English Heritage considered that this chapter should include maps. They said that a map should be included under each of the four sections of the chapter that relate to the four strategic locations and also under the ‘Rural Area’ section. English Heritage claimed that each map should show the location of the area and its key characteristics, including the historic environment. They also believed that there should be a map that shows all conservation areas and heritage assets in the Borough and that the Plan would also benefit from a map that identifies heritage assets.

Flood Risk
The chapter highlights that development will not take place in high flood risk areas. However, some residents claimed that there are areas North of Dowbridge, Kirkham that are at risk of flooding. Another resident said that Hillock Lane at Warton is located within a high flood risk area, and that the road has had

\(^2\) Some respondents submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
to be closed on numerous occasions due to flooding. The resident added that if the fields are built over, this will almost certainly increase the amount of surface water run-off and make the flooding significantly worse.

**Lytham and St Annes**

*Seafronts*
Lytham St Annes Civic Society supported the development of the Ribble Coast and Wetland Regional Park. However, they said that there should be reference to Lytham Green. They agreed that Lytham and St Annes town centres should be supported, but they added that the differences between Lytham and St Annes seafronts are not mentioned. They considered that there should be a policy that keeps Lytham’s seafront distinct to that of St Annes; that tourism related outlets should be kept away from the Green; and that commercial events on the Green should be restricted in order to keep it as an important open space for the amenity of residents and tourists. They also said that parking should only be allowed when supporting these events.

*Surface water*
United Utilities suggested that paragraph 2.19 should specify that a number of watercourses in the area discharge to the combined sewage system. They added that this would help explain the issues with the system and that surface water is fully considered before a planning application is submitted. In relation to paragraph 2.24, they suggested that the statement reference to “increased capacity of the combined sewer system” should be deleted as there are other factors that will have driven the phasing.

*Ballam Road / Peel Road*
The Lytham St Annes Civic Society observed that the constraints map omits the Ballam Road / Peel Road route to the M55. They said that this route is used by the majority of residents in Lytham, and is very poor. They claimed that the alternative route through Wrea Green is also poor. They added that the site for Cuadrilla’s exploratory drilling is directly off Peel Road and that Ballam Road / Peel Road will be the route for tanker loads of water to be transported to Davyhulme. The Civic Society considered that the roads are unsuitable for this purpose.

*Deprivation*
Cllr Eastham questioned the accuracy of the statement in paragraph 2.11 that Fairhaven ward has been in the bottom third of the poorest wards in the country.

**Kirkham and Wesham**

*Conservation Area*
Paragraph 2.29 says that “the appearance of [Kirkham] town centre has deteriorated recently and requires investment.” English Heritage claimed that this suggests that the historic core is of poor quality. However, they said that the Conservation Area does not appear to be on the Conservation Area at Risk Register. English Heritage also said that reference is made in paragraph 2.29 to the protection of unfound archaeological remains at Kirkham and Wesham. They claim that evidence is needed to support this statement.

*Retail offer*
Cllr Eastham said that the sentence in paragraph 2.29: “The retail offer in Kirkham town centre is limited” should be reworded, as he suggested that the word “limited” gives the wrong impression of the centre’s offer.

*Ribby Hall Village*
For paragraph 2.30, Cllr Eastham considered that the part of the sentence that says that Ribby Hall Village “may have the potential for expansion” should be deleted as it is questionable whether that potential actually exists.
Freckleton and Warton

Warton – BAE Systems / Enterprise Zone
A resident claimed that the Lancashire Enterprise Zone (Warton) will not create net additional jobs at Warton, as it is extremely unlikely that the Warton site will attract sufficient business to compensate for the BAE Systems staff reductions. The resident also considered that there is no shortage of housing in Warton for BAE Systems employees. The resident claimed that historically most employees at BAE Systems did not want to live close to where they worked, and there were and continue to be homes for sale in Warton for long periods. The resident added that the long term prospects for BAE Systems are not good, and that the Enterprise Zone will at best enable people from BAE Systems to continue to work in Warton, but that in reality the number of jobs in Warton is likely to decrease.

A resident claimed that the assumption that the restructure of BAE Systems, Warton and the establishment of the Enterprise Zone will create “net additional employment opportunities” is wrong. The resident suggested that there is continuing worldwide reductions in defence spending, and that the restructuring at BAE Systems, Warton means redundancies rather than merely moving staff around. Because of this, the resident suggested that the housing requirement in Warton should be reduced to a sustainable figure.

BAE Systems Real Estate Solutions did not agree with the terminology in paragraph 2.33 that the area is constrained by existing employment land at BAE Systems, Warton. They considered that the Plan should provide positive statements in relation to the opportunities that existing land areas can provide through continued employment and jobs. BAE Systems Real Estate Solutions also recommended that that it would be useful if support was given in the document to the inclusion of the northern part of the Warton Aerodrome within the settlement boundary of Warton. They considered that the density, scale, form and amount of development within this area is urban in character.

BAE Systems Real Estate Solutions considered that it would be useful to provide information on the Lancashire Enterprise Zone and the Local Development Orders (LDOs) in the Plan, including their purpose and how they operate. They agreed with paragraph 2.38, but were not convinced that the Local Plan provides an explicit statement on a flexible framework for the Warton Aerodrome and Enterprise Zone sites. They also suggested that the Local Plan should ensure that there is protection and safeguarding for operations related to the airfield at Warton Aerodrome.

Warton – Secondary school
A resident questioned the need for a new secondary school as Census data shows a sharp decrease in 0-19 year olds in the Borough. The resident added that Warton is a curious location for a new secondary school if the need is in St Annes. In relation to the reference in the paragraph to the provision of land for recreational opportunities, the respondent claimed that there are already recreational opportunities at Warton.

A resident considered that the siting of a secondary school at Warton would create a major traffic problem during rush hour times.

Warton – Centre
In relation to paragraph 2.39, a respondent considered that Warton already has a recognised centre. BAE Systems Real Estate Solutions suggested that the need for retail provision at Warton has not been satisfied. They claimed that there may be an opportunity at Warton Aerodrome, to provide a site or sites at an accessible location for a District Centre in Warton.

Warton – Other issues
Treales, Roseacre and Wharles Parish Council questioned the impact of Warton development on shopping and schools at Kirkham and Wesham, and asked what assessment had been carried out.

For paragraph 2.34, Cllr Eastham recommended that the last sentence, which refers to Freckleton and Warton as being the “most affordable in the borough” should be reworded to “one of the most affordable”.

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In relation to paragraph 2.36, a resident claimed that there is no shortage of allotments in Warton.

**Freckleton – Green Belt**

Paragraph 2.39 claims that without a review of the Green Belt, development at Freckleton will be limited to infill. Some residents suggested that there is a need to review the Green Belt at Freckleton because it is preventing Freckleton from playing its proper role as a Local Service Centre. They also claimed that Freckleton has operated as a significant settlement for several hundred years; that it has direct transport links to Kirkham; that the Green Belt at Freckleton is preventing the natural development of Freckleton; and that the Green Belt is threatening the continued viability of the substantial retail and other service offering to the region at large. The residents also added that substantial proportionate housing development on the current Green Belt would invigorate the current service offering.

Residents claimed that at the Examination in Public stage of the earlier Joint Lancashire Structure Plan (JLSP), a proposal to designate Warton as a Local Service Centre was comprehensively discussed and rejected by the JLSP authority on the grounds that people from surrounding villages did not travel to Warton to access services (since that time the facilities in Warton have been reduced).

The residents suggested that there is a need to provide more local support to Freckleton’s retail services so that they can continue to provide services to the local region. The residents suggested that it is crucial that the Plan supports the maintenance of healthy retail centres and other services, and that this requires concentration on the development of these centres rather than introducing scattered competitive services around the Borough.

A resident added that the Preferred Options document has already amended Green Belt policy by the addition of an Area of Separation between Wrea Green and Kirkham, and that it is clear from the definition that this is Green Belt.

**Fylde-Blackpool Periphery**

Blackpool Council questioned why the Fylde-Blackpool Periphery area includes Normoss and Westby-with-Plumptons parish, as no strategic development is proposed here and they are not included in the Key Issues / Implications for the Local Plan section. In relation to the sub regional significance of the Whitehills area, Blackpool Council suggested that they would prefer reference being made to “Land at Junction 4 of the M55” to reflect the opportunities in this area and to be consistent with the Memorandum of Understanding. They also suggested that reference to Whitehills’ sub regional importance beyond the plan period in paragraph 2.48 is confusing.

**Surface water**

United Utilities suggested alternative wording for paragraph 2.46 regarding surface water management to read: “There are surface water issues in the vicinity of junction 4 of the M55, which mean that development in this area will need to carefully consider the approach to surface water management. The most sustainable form of managing the surface water from the site will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. This would be to greenfield run-off rate. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. Subject to the detail of the drainage proposals, it may be necessary to co-ordinate the delivery of the development with the delivery of infrastructure.”

**Dunes**

Lancashire Wildlife Trust said that the DEFRA funding referred to in paragraph 2.45 only covers the period 2013-2017, after which further funding will be required to manage the dunes to maintain their flood defence function.
Rural area

Agriculture
The National Farmers Union was pleased that the importance of agriculture within the region had been acknowledged in paragraph 2.52; that there is an understanding that there is a need for diversification as part of a prosperous rural economy in paragraph 2.54; and that paragraph 2.57 portrays a positive future for the farming and rural community.

Static caravans
For paragraph 2.53, Cllr Eastham suggested that the last sentence that says “The unauthorised use of static holiday caravans for residential use puts pressure on local facilities” should be deleted if a policy is not included relating to this issue. Treales, Roseacre and Wharles Parish recommended that there is a need for the Local Plan to consider occupancy of static caravans, along with the extra demand on services if all static caravans were occupied. They suggested that it would make sense to provide services for static home users.

Other issues
Treales, Roseacre and Wharles Parish Council questioned why there is no reference to Roseacre as part of the rural area.

Lancashire Wildlife Trust suggested that paragraph 2.56, in relation to shale gas exploration, needs to mention impacts on biodiversity.

Council response

Fylde Borough

Population growth
The Fylde Coast Strategic Housing Market Assessment (SHMA), which was published in June 2014, contains the most realistic population projections for the Borough that will be used in the next version of the Local Plan (Part 1).

Heritage
The Council agrees that reference needs to be made to the heritage of the Borough, including some of its key heritage assets, within the ‘Fylde Borough’ section and for each of the settlement areas under the ‘Local Areas’ section.

The Council will refer to the Local Areas and Key Constraints map within the text and that Fylde–Blackpool Periphery will be identified on the map.

The Council does not consider that the maps should show the key characteristics of the locations. However, the Council agrees to identify all 10 conservation areas and the 3 registered Historic Parks and Gardens on the Policies Map.

Comments in relation to heritage characteristics and assets are dealt with in policy ENV5 and in the supporting text in chapter 14. Policy ENV5 is to be completely re-drafted, taking on board the comments made by English Heritage.

The Council will include reference to registered Historic Parks and Gardens in paragraph 2.16 of the Preferred Options document.

Flood Risk
Areas within Flood Risk Zone 3 are considered to be at the “highest” risk of flooding. Part of site H7 on land north of Dowbridge, Kirkham is in Flood Risk Zone 2. Government policy allows housing development in
Flood Risk Zone 2 only if the ‘Sequential Test’ has been met, which shows that there are no appropriate alternative sites that are not within Flood Risk Zone 2.

Part of site H10 (Land east of Warton) is within Flood Risk Zones 2 and 3. For sites that overlap into Flood Risk Zone 3, Government policy allows housing development if the ‘Sequential’ and ‘Exceptions’ test has been met.

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of development, such as landscaping and infrastructure. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the Policies Map. For strategic location sites with approved permissions, the number of dwellings specified in the application has been used as the site’s capacity.

The main flood risk issue at Warton is surface water flooding. This is mainly due to the drainage of the surrounding land. In terms of development taking place on this land, the Environment Agency have advised the Council there are normally engineering solutions to such issues and that such issues can normally be overcome through appropriate Sustainable Drainage Systems (SuDS), and such a system would be agreed at the planning application stage.

Lytham and St Annes

Seafronts
The Council agrees that reference should be made in this section to the distinct identity of Lytham seafront, and that of St Annes seafront. However, the Council does not agree that there should be a policy on the seafronts at Lytham and at St Annes. Policy ENV2 of the Preferred Options document protects open spaces, and this includes Lytham Green. Policy CL1 requires developer contributions through the Community Infrastructure Levy for the repair or replacement of the coastal flood defences, and this would include substantial works at the defences at Pleasure Island, Fairhaven Lake and Church Scar. Therefore, there is expected to be substantial improvements to the promenade in these locations. The Council recognises the key role and significance that Lytham Green plays within the wider townscape and the importance of protecting this feature from inappropriate development.

Surface Water
The Council will amend paragraphs 2.19 and 2.24 as suggested by United Utilities.

Ballam Road / Peel Road
The purpose of the map is to identify ‘key’ constraints. It would not be feasible to include infrastructure constraints, including highway capacity, school capacity, sewer capacity on the map as such issues are extensive across the Borough. Infrastructure issues will be identified in the Infrastructure Delivery Plan, which will support the Local Plan. In response to comments regarding infrastructure impacts of shale gas exploration and extraction (‘fracking’), the Local Plan Part 1 has not planned for shale gas, as it is too early to factor in, it is not known if it is economically viable. If it takes off economically, the Council will undertake a further review.

Deprivation
Paragraph 2.11 contains an error. The opening sentence should read: “There are a few pockets of significant deprivation, particularly in parts of the St Annes wards of Central, Ashton, Fairhaven and Kilnhouse, which are recorded as being in the bottom third poorest LSOAs³ nationally.”

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³ Lower Super Output Areas
Kirkham and Wesham

Conservation Area
In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be done. The Heritage Strategy sets out a strategic framework for future heritage works streams, including a statement of intent to undertake conservation area appraisals and management plans where relevant.

The evidence to support the reference in paragraph 2.30, to the protection of unfound archaeological remains at Kirkham and Wesham, can be found in the Lancashire Historic Towns Survey. Reference to this will be provided in the next version of the Local Plan (Part 1) to support the statement.

Retail offer
The Council will refer to Kirkham’s position in the retail hierarchy and amend reference to “limited” and delete the reference to “increasing vacancy rates and a growing number of charity shops”.

Ribby Hall Village
The Council will clarify the role of Ribby Hall Village, i.e. there will be no expansion beyond the existing boundary of the site.

Freckleton and Warton

Warton – BAE Systems / Enterprise Zone
There has been significant investment at BAE Systems at Warton in the last five years, including runway resurfacing, new offices and hangers. BAE Systems, Warton are receiving new orders (including Typhoon and Hawk) which will enable consolidation on the site, after some initial shrinkage which was required to ensure the company remained competitive.

The aim of the Enterprise Zone at BAE Systems Warton is to attract a range of advanced engineering and manufacturing businesses. BAE Systems Real Estate Solutions have claimed that they anticipate the creation of 3,000 jobs at the Enterprise Zone over the next 20 years. The siting of the Enterprise Zone at BAE Systems, Warton provides an added impetus to the implementation of new infrastructure, particularly the construction of the Preston Western Distributor road, identified in the Central Lancashire Highways and Transport Masterplan, which will provide easier access to the Enterprise Zone from the strategic road network.

Paragraph 2.33 will be amended to delete “constrained” and replace with “defined”.

The Council does not agree that the northern part of the Warton Aerodrome should be included within the Warton settlement boundary. However, the boundary of the Enterprise Zone will be identified on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).

The Council considers that the level of reference to the Enterprise Zone in chapter 2 is sufficient. Chapter 9 contains a section that provides further information on the Lancashire Enterprise Zone at BAE Systems, Warton.

In relation to the protection and safeguarding of Warton Aerodrome, paragraph 9.23 says: “Existing employment sites included in the adopted FBLP (including land at BAE Systems, Warton), will continue to be protected until the Fylde Local Plan 2: Site Allocations to 2030 is produced. Therefore, the future of the Enterprise Zone will be assessed after its initial three years, as part of the Local Plan Part 2.”

Warton – Centre
The Council acknowledges that there is a small cluster of amenities in the centre of the settlement. However, the Council considers that a more substantial and clearly defined centre is required to support existing residents, and also to serve the prospective residents of the proposed strategic housing allocations.
at the settlement. The Council will consider allocating a ‘Village Centre’ at Warton as part of the Local Plan Part 2 preparation process. The Council is aware of a strip of land adjacent to Lytham Road, in BAE Systems ownership, which could be included as part of an allocated ‘Village Centre’ in the Local Plan.

**Warton – School**
The process of establishing a location for a secondary school is still at an early stage. It is anticipated that a definitive decision as to whether a new secondary school will be required, along with its location within the catchment area identified by Lancashire County Council will be made before the Council issues the next version of the Local Plan (Part 1).

Potential sites for a secondary school within Lytham and St Annes were considered by Lancashire County Council, but such sites were either too small, had planning permission for other uses, or were on sites where development is close to going ahead or being approved.

Land west of Warton was suggested as a preferred location by Fylde Council as it is anticipated that the school could also serve the demand associated with the strategic housing sites proposed at Warton in the Preferred Options. It is also less likely to compete with existing secondary schools and will serve the population in east Fylde.

United Utilities have advised that development could be phased earlier in the Plan period at Warton, as there are serious capacity issues with the combined sewer network at Lytham St Annes.

**Warton – Other Issues**
The Council agrees that the last sentence of paragraph 2.34 which refers to Freckleton and Warton as being the “most affordable in the borough”, should be reworded to “This area is one of the most affordable in the Borough, but additional affordable housing is required”.

The Council agrees to delete paragraph 2.36 regarding allotments.

The Council considers it necessary to cross refer to paragraph 7.49 in chapter 7 of the Preferred Options document: “it is anticipated that development at Warton will provide for increased shops, improved local facilities, and better access to the centre and that this will assist in providing Warton with an improved local centre, and enhanced sustainability as set out in the Vision.”

**Freckleton – Green Belt**
Paragraph 8.7 of the Preferred Options document says that “no strategic review of the Green Belt within Fylde Borough will be undertaken when producing the Local Plan.” The NPPF clarifies that “Green Belt boundaries should only be altered in exceptional circumstances.” The Council does not believe that there are “exceptional circumstances” to review the Green Belt, including the points raised by respondents during the Preferred Options consultation exercise.

**Fylde-Blackpool Periphery**

### Members Decision

The Members resolved at the Local Plan Steering Group meeting on 8th May 2014 to rename the area of land labelled as the “Blackpool Periphery” in the Preferred Options document to: the “Fylde-Blackpool Periphery”.
The Council agrees that ‘Normoss’ should be deleted from paragraph 2.41, as no strategic development is proposed in this location. The Council will amend the reference to Westby-with-Plumptons to refer to the North West area of the parish.

The Council will amend paragraph 2.48 to remove “beyond the plan period”.

**Surface water**
The Council will amend paragraph 2.46 as suggested by United Utilities.

**Dunes**
The Council will make reference in the text to the need for further funding that will be required for dune management beyond 2017.

**Rural Area**

**Agriculture**
The Council acknowledges the positive comments from the National Farmers Union for paragraphs 2.52, 2.54 and 2.57.

**Static caravans**

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**Members Decision**

The Members have resolved not to draft a policy which regulates the unauthorised use of static holiday caravans for residential use.

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The Council agrees in paragraph 2.53 to cross refer to policy EC6 and its reasoned justification, which resists the loss of caravan pitches.

**Other issues**

In response to Treales, Roseacre and Wharles Parish Council’s question why there is no reference to Roseacre as part of the rural area; the Issues and Options paper included an appendix (Appendix 1) which looked at settlement hierarchy, population and accessibility score. The Council will, however, consider refining the settlement hierarchy for settlements outside the strategic locations as it develops the next version of the Local Plan based upon the settlement sustainability.

The Council agrees that paragraph 2.56 should mention the impacts of shale gas exploration and extraction on biodiversity.

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**Recommendations for change**

- Amend the ‘Fylde Borough’ section at the start of chapter 2 to make reference to the heritage of the Borough, including some of its key heritage assets and for each of the settlement areas under the ‘Local Areas’ section, making an assessment of their contribution to the area. Cross refer to the Heritage Assets, which are set out in more detail in policy ENV5 and in the supporting text in chapter 14.

- Add “Figure 2” to the title of the “Fylde in Context” map on page 14 of the Preferred Options.

- Refer to Local Areas and Key Constraints map from page 22 within paragraph 2.7 of the Preferred Options.
• Include the new name of “Fylde-Blackpool Periphery” throughout the document.

• Add “Figure 3” to the title of the “Local Areas and Key Constraints” map on page 22 of the Preferred Options.

• Amend the first sentence in Paragraph 2.11 of the Preferred Options to read: “There are a few pockets of significant deprivation, particularly in parts of the St Annes wards of Central, Ashton, Fairhaven and Kilnhouse, which are recorded as being in the bottom third poorest LSOAs4 nationally.”

• Refer to a settlement’s position in the settlement hierarchy, i.e. Lytham and St Annes (amend paragraph 2.12 of the Preferred Options document) and Kirkham (amend paragraph 2.29 of the Preferred Options) are key service centres.

• Amend paragraph 2.16 of the Preferred Options to read: “There is a high concentration of listed buildings and conservation areas, with Lytham Hall a Grade I listed building on the ‘property at risk’ register. There are 3 registered Historic Parks and Gardens of national importance: Ashton Gardens and Promenade Gardens in St Annes and Lytham Hall Park in Lytham. All of the conservation areas and the 3 registered Historic Parks and Gardens are identified on the Policies Map”.

• Add the following paragraph before the ‘Local Area’ section in Chapter 2: “Fylde contains a number of heritage features, referred to as ‘heritage assets’, including 197 Listed Buildings (of which one is Grade I, five are Grade II* and 191 are Grade II), 10 Conservation Areas, 3 Registered Parks and Gardens (included within the national register: i.e. Lytham Hall Park, Ashton Gardens and Promenade Gardens, all within Lytham and St Annes) and 1 Building at Risk. There are no scheduled ancient monuments, but there is the potential for undesignated archaeological sites. In addition, there are heritage assets of local interest that may not meet the criteria for statutory designation but merit protection. The heritage assets are set out in more detail in policy ENV5 and in the supporting text in Chapter 14”.

• Add the following text after the first sentence in paragraph 2.19 of the Preferred Options document: “A number of watercourses in the area discharge to the combined sewage system”.

• In paragraph 2.24 of the Preferred Options, delete: “such as increased capacity of the combined sewer system”.

• Amend the second sentence in paragraph 2.29 of the Preferred Options to read: “Kirkham like Lytham and St Annes serves the role of a key service centre, but has less retail offer. Delete the following wording: “Kirkham has increasing vacancy rates and a growing number of charity shops”.

• Amend paragraph 2.30 of the Preferred Options, which refers to Ribby Hall Village to read: “…..where there may be the potential for future investment and enhancement”.

• Paragraph 2.33 of the Preferred Options, delete “constrained” in the second sentence and replace with “defined”.

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09/07/2014 Version 1.5
- Amend the last sentence of paragraph 2.34 of the Preferred Options which refers to Freckleton and Warton to read: “This area is one of the most affordable in the Borough …”

- Delete paragraph 2.36 of the Preferred Options, which referred to a shortage of allotments.

- Amend the section on Seafronts to make reference to the distinct identity of Lytham seafront, and that of St Annes seafront. Draft the wording on the distinct identity of Lytham seafront and St Annes seafront.

- Delete ‘Normoss’ from paragraph 2.41 of the Preferred Options. Amend Paragraph 2.41 of the Preferred Options to refer to “…North West Westby-with-Plumptons”.

- Add the following sentence to the end of paragraph 2.45 of the Preferred Options: “In addition to the existing funding from DEFRA for dune management, which only runs from 2013 to 2017, there is a need for further funding to manage the dunes to maintain their flood defence function”.

- Amend paragraph 2.46 of the Preferred Options document to read: “There are surface water issues in the vicinity of junction 4 of the M55, which mean that development in this area will need to carefully consider the approach to surface water management. The most sustainable form of managing the surface water from the site will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. This would be to greenfield run-off rate. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. Subject to the detail of the drainage proposals, it may be necessary to co-ordinate the delivery of the development with the delivery of infrastructure.”

- Delete “beyond the plan period” from the second sentence of paragraph 2.48 of the Preferred Options document.

- Amend paragraph 2.53 of the Preferred Options document by adding a new sentence cross referencing to policy EC6 and the reasoned justification, which resists the loss of caravan pitches.

  Amend paragraph 2.56 of the Preferred Options document to read: “The potential for shale gas exploration and extraction in the Fylde area could provide benefits to the local economy, but could also have impacts on rural tourism, farming, biodiversity and quality of life.”
Chapter 3: A Vision for Fylde

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Representations received from:

- Councillor Eastham
- Treales, Roseacre and Wharles Parish Council
- Blackpool Council
- BAE Systems Real Estate Solutions
- Kirkham Grammar School
- 3 Residents

What you said

A resident suggested that as the Local Plan Vision makes reference to the merits of “attractive villages” separated by “pleasant landscapes”, fewer houses will need to be built, resulting in fewer greenfield areas being lost. The resident claimed that the Plan should concentrate new housing near to services, e.g. Whyndyke Farm, rather than in rural areas where many needs cannot be met.

A resident suggested that the Vision is superficial, unconvincing, and does not recognise the Borough’s pressures, problems, opportunities and choices to be made. The resident claimed that the Vision does not address the issue of migration; and that the ongoing development of Warton for cheap housing is disguised by declaring it to be development arising from the Enterprise Zone and the assertion that new housing will improve services. The resident claimed that Warton will not get a GP Surgery or a Pharmacy, as is set out later in the document, as there are substantial services nearby. In terms of a swimming pool, the resident questioned how Warton can sustain a swimming pool when the Borough cannot sustain two swimming pools in its population centres.

A resident suggested that the general state of confusion in the Vision is captured most succinctly in the fifth paragraph which seems to suggest that climate change risk will be ameliorated by low carbon energy generation in the Borough. The resident recommended that a much better Vision statement could read: Recognise the level of environmental stress on the Borough; refrain from house building on green fields which will make surface drainage a bigger issue; do not rely on pumped Sustainable Drainage Systems, as they fail under extreme conditions; and address the issue of drainage and flood defence more seriously.

A resident suggested that the new Enterprise Zone was set up by the government to mitigate the redundancies from BAE Systems, Warton not to attract new people to the Fylde. Therefore, the resident recommended that there is no need to develop at Warton. With regard to the statement “All development will have respected and conserved the individual character of the villages”, the resident claimed that the Plan does not respect or conserve the character of Warton. The resident suggested that the scale of development proposed at Warton is against the wishes of the residents, as expressed in the Parish Plan. The resident claimed that Warton is a village comparable in population to Freckleton, but with fewer public

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5 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
amenities; and that Warton should be included in the plan as a village with equal status to other villages in the Fylde.

Cllr Eastham recommended that the terminology of the last sentence in the second paragraph, should be changed from "a unique visitor experience" to "a quality visitor experience."

Treales, Roseacre and Wharles Parish Council suggested that the last sentence in the final paragraph on page 25 should be made into a new paragraph.

BAE Systems Real Estate Solutions recommended that in the fourth paragraph of the Vision there should be a clear statement of where Warton will be by 2030. They provided an example which reads: "Warton will be a Key Service Centre with a District Centre servicing the enlarged community living within and around Warton and employment opportunities will increase and diversify through development at the Warton Enterprise Zone."

For the tenth paragraph, BAE Systems Real Estate Solutions agreed that Warton Aerodrome is a sub-regionally important employment site. They added that reference should be made to the Lancashire Enterprise Zone and the importance this initiative has to the UK’s advanced engineering and manufacturing sector. For the 11th paragraph, they suggested that in relation to housing the sentence should read: “New homes of a type and mix to address demand and need, affordability, an ageing population and family needs will be located in suitable locations.”

Blackpool Council commented that the reference to providing a new passing point on the Blackpool South rail line appears to be premature, and also does not take account of the background text to policy T2 regarding potential double tracking of the South Fylde Line. Blackpool Council also questioned whether the Vision should reference the South Fylde Line rather than the Blackpool South rail line. They also claimed that the link road to a new junction of the M55 is important to improving road access / connectivity to the Fylde Coast, as opposed to serving new housing in Preston. Blackpool Council suggested that it may be appropriate to re-order the text to reflect this.

Kirkham Grammar School commented that the allocation and development of their off-site playing fields for residential purposes will assist in achieving a number of aspects of the Vision, including the provision of ‘decent and affordable homes,’ ‘sufficient open space and... outdoor recreational facilities’ and 'new homes of an appropriate type and mix to address affordability, an ageing population and family needs will be located in suitable locations.'

**Council response**

The villages referred to in the Vision are those listed in policy SD1 of the Local Plan – Preferred Option document. Non-strategic sites will be identified for development at the “Rural Villages” in the Local Plan Part 2 document. Development at the “Small Villages” will be limited to “like-for-like redevelopment of an existing property, the appropriate re-use of an existing building or minor infill development.” The majority of the development in the Local Plan – Preferred Options document is proposed at the four strategic locations where there is good access to services (or in the case of Warton, where improved services can be facilitated).

The issue of migration has been fully factored into the calculation of the final housing requirement for the Plan period. The Vision fully takes account of the housing growth proposed in the Preferred Options document. The SHLAA demonstrates that there is not enough land within the Borough’s settlements to meet the Borough’s housing requirement. Therefore some strategic settlement extensions need to be considered for allocation. These will be landscaped so that the quality of the landscape, in particular the views from the countryside, are protected.

The Local Plan (Part 1) takes flood risk seriously (see policy CL1), and this is reflected in the Vision. Surface water flooding is not a reason for not allowing development. The Environment Agency have
advised the Council that there are normally engineering solutions to surface water issues when new development takes place, and this would take the form of appropriate Sustainable Drainage Systems. The Vision also makes extensive references to environmental issues.

The purpose of the proposed Preston Western Distributor road is to improve access to the Fylde Coast, support delivery of the North West Preston strategic housing location, overcome existing congestion on the strategic road network, release pressure off Broughton roundabout in terms of the number of vehicles and improve access from the highway network to the Enterprise Zone site at Warton. Therefore, improving access and connectivity to the Enterprise Zone at Warton is key to the Enterprise Zone and consequentially enabling the delivery of housing growth in Warton. In terms of facilities, it should be noted that paragraph 7.49, says that “improved facilities could include a GP surgery, pharmacy and new swimming pool.” In terms of a GP Surgery, NHS Property Services have since confirmed that the Primary Care Centres at Lytham and Freckleton are future proofed and will therefore be able to accommodate future growth at Warton. Therefore, new provision will not be required at Warton. In terms of a swimming pool, the Council anticipates that the updated Open Space, Sport and Recreation Assessment will identify if a swimming pool is required in the Borough, and if so, where this should be located. More general comments regarding social infrastructure requirements in Warton will arise through ongoing discussions with infrastructure providers, including public health at Lancashire County Council which will inform the Infrastructure Delivery Plan.

In terms of climate change, the Vision says that “any negative effects of climate change brought about by increased energy use will be minimised, with a higher dependence on renewable and low carbon sources.” This implies that such sources will minimise the impacts of increased energy use. The Council does not consider this to be a “confused” statement.

Although the Warton Parish Plan shows that residents are against large scale expansion of Warton, the Local Plan (Part 1) must be supported by a robust evidence base.

The Council agrees that Warton is currently a village comparable in population to Freckleton, but with fewer amenities. However, the Council does not agree that Warton should be included in the plan as a village with equal status to other villages in Fylde. Warton has many advantages over other settlements, including the Enterprise Zone and the proposed Preston Western Distributor road. Whilst Warton is similar in size to Freckleton, it is significantly larger than the other villages of the Borough and therefore cannot be given equal status to them. Freckleton has significant constraints to expansion including the Green Belt and Flood Risk Zone 3.

The Council agrees to amend “unique” in the second paragraph of the Vision, to “quality”.

The Council agrees to include the last sentence of the Vision as a separate paragraph.

The Council agrees that further detail should be provided in the Vision on where Warton will be in 2030 and clarify whether it will be a key or local service centre by the end of the plan period. The Council will also include additional information regarding the Lancashire Enterprise Zone and its importance to the UK’s advanced engineering and manufacturing sector within chapter 9 (The Fylde Economy).

The Council considers it necessary to set out clearly in the text of the Vision for Fylde, the aspirations for what the settlement hierarchy and the retail hierarchy will be at the end of the plan period, in 2030.

The Council disagrees with the suggested amendments of the 11th paragraph, the Local Plan will meet the housing need, not demand.

The Council agrees that the reference to providing a new passing point on the Blackpool South rail line is premature, as this concept is currently aspirational. The Council agrees that the rail line should be referenced as “South Fylde Line” rather than “Blackpool South Line.” The South Fylde Line runs from Preston to Blackpool South Station.
The Council agrees that the text should be re-ordered in the ninth paragraph so that the benefits of the Preston Western Distributor road to the Fylde Coast are mentioned before access to the new housing in North West Preston. Many of these initiatives will be set out in the Fylde Coast Highways and Transport Masterplan, which the County Council will be consulting on in autumn 2014.

The comments made by Kirkham Grammar School are noted.

Recommendations for change

- Amend the last sentence of the second paragraph to read: “… regenerated to provide a quality visitor experience”.

- Amend the fourth paragraph to set out clearly what the Council will aspire the settlement hierarchy and the retail hierarchy to be at the end of the plan period. In terms of settlement hierarchy, Warton will be a local centre and Fylde-Blackpool Periphery will become a local centre.

- Insert the following text in the fourth paragraph: “Warton will be a Local Service Centre with a Village Centre servicing the enlarged community living within and around Warton and employment opportunities will increase and diversify through development at the Lancashire Enterprise Zone, BAE Systems, Warton” in place of the existing sentence which reads: “Warton will have developed as a result of the Enterprise Zone, with improved local services”.

- Delete the reference in the ninth paragraph to providing a new passing point on the Blackpool South rail line (to be renamed “South Fylde Line”).

- Amend references throughout the document to read “South Fylde Line”.

- Re-order the text in the ninth paragraph so that the benefits of the Preston Western Distributor road to the Fylde Coast, are mentioned before access to the new housing in North West Preston. The sentence should say: “A link road (i.e. the Preston Western Distributor) to a new junction of the M55 will have been provided. This will improve road access to the Enterprise Zone at Warton, the wider Fylde Coast, and serve new housing in north-west Preston, as identified in the Central Lancashire Highways and Transport Masterplan.”

- Add the following text at the end of the ninth paragraph: “All of the road and public transport improvements, mentioned here, are set out in the Fylde Coast Highways and Transport Masterplan, which will be implemented alongside this Local Plan”.

- Amend text in the tenth paragraph to read: “Opportunities for sub-regionally important employment in the advanced engineering and manufacturing sector at the Lancashire Enterprise Zone (BAE Systems at Warton); Blackpool International Airport and Whitehills will have been realised and employment will have been provided close to where people live”.

- Amend the last sentence of the final paragraph of the vision to be a separate paragraph, i.e. “All development will have respected and conserved the individual character of the villages”.
Chapter 4: Strategic Objectives

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Representations received from:

- English Heritage
- Environment Agency
- Natural England
- Sport England
- United Utilities
- Campaign to Protect Rural England (CPRE) – Fylde District
- Councillor Eastham
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Blackpool Council
- The Minority Group Report
- AXA Insurance
- BAE Systems Real Estate Solutions
- Kirkham Grammar School
- 3 residents
- 2 residential developers

What you said

Kirkham Grammar School state that the strategic objectives will be met by the allocation and development of the Kirkham Grammar School playing fields site for housing.


Objective 1 – To Create Sustainable Communities

A resident claimed that this objective does not address community sustainability. The resident commented that increasing Warton at the expense of Freckleton makes Freckleton less viable; and that increasing the size of Warton will not bring Warton’s facilities back. The resident suggested that increasing the size of Warton will not bring a pharmacy or a doctor; and that a supermarket at Warton will have a detrimental impact on other supermarkets in the area. The resident claimed that the Council has failed to address the retail balance across the Borough.

A resident suggested that the majority of the sites proposed for building in the Plan are greenfield; and that this is a cost saving exercise that has nothing to do with planning. The resident said that the Plan should identify previously developed sites.

\^6 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
AXA Insurance claimed that they own land that is deliverable and developable and are willing to bring this land forward for housing. AXA Insurance supported the need to bring forward housing, but that they believe the strategy for Lytham St Annes is flawed as it does not allow for a range and choice of sites and focuses too much development in one location. AXA Insurance gave the view that the SHLAA has incorrectly assessed the deliverability of this site.

BAE Systems Real Estate Solutions agreed that previously developed sites should be used in preference to greenfield land. They suggested that part 3 of the objective should be amended to read: “Bring forward a responsive and deliverable supply of housing land…” BAE Systems Real Estate Solutions claimed that this would be in line with NPPF paragraph 47.

A residential developer suggested that there is a need to ensure that the housing needs of the community are achieved and that a flexible supply of housing land is provided. However, they questioned whether this will be the case as the evidence is not fully in place and relying on the Regional Spatial Strategy may not be enough. They claimed that the Plan fails to fully set out the objectively assessed need for housing and that this could have serious ramifications as the Plan progresses.

The Environment Agency supported the Objectives but that the only reference to site investigation and remediation in the Plan is in Objective 1, apart from in Appendix 1 which makes reference to paragraphs 121 and 122 of the NPPF. The EA added that this should probably be paragraphs 120 and 121 of the NPPF. The EA felt that it is important that the remediation of contaminated land should be incorporated into a policy, either in Part 1 or Part 2. They suggested that if included in Part 1, policies HW1 and CL1 may be appropriate. The EA aim to secure a level of remediation in parallel with national criteria set in the Local Plan.

**Objective 2 – To Improve the Environment**

A resident suggested that this objective has been compromised by the failure to address environmental sustainability and to engage with the Borough’s residents regarding the level of inward migration that the area can sustain. The resident claimed that every environmental risk that the objective seeks to address is compromised by building on green fields.

A resident supported Objective 2, but would like a review of the Green Belt to prevent the urban sprawl of Blackpool.

BAE Systems Real Estate Solutions supported the initiative for the Ribble Coast and Wetlands Regional Park; and would like to be involved in this initiative to ensure that the proposals can align with the operational requirements of the Aerodrome and the respective aviation authorities.

Natural England welcomed this objective, but recommended that soils and geodiversity are also referred to. They recommended that the Plan identifies a requirement for developers to agree the details of buffer design with the Wildlife Trust and other relevant bodies, so as to ensure adequate protection of sites and maintenance of habitat connectivity. In relation to recreational disturbance impacts affecting designated sites, Natural England commented that mitigation is likely to include provision of green infrastructure. In line with NPPF requirements for ecological enhancement, Natural England said that all development should aspire to net biodiversity gain wherever possible. They added that protected and biodiversity action plan (BAP) species and their habitats should be protected and enhanced through the Local Plan; and that it should identify the requirement for planning applications to be accompanied by detailed ecological assessment, mitigation and enhancement proposals.

**Objective 3 – Making Services Accessible**

A resident commented that the situation for this objective is much the same as that stated for objective 2 [see first paragraph under ‘Objective 2’ above]. In relation to the South Fylde Line, Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested that the objective should be
extended to include a passing loop. He also recommended that the objective should include a park and ride and pedestrian lift at Kirkham and Wesham Station. Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors also commented that greater access should be encouraged at other stations in the Borough, and that bus and train travel should be more integrated. The Cllr considered that the M55 – Heyhouses link road is long overdue; and that the provision and enforcement of disabled parking is woeful.

Blackpool Council suggested that it would be better to state “improving” the South Fylde Line, as opposed to “promoting” it.

English Heritage welcomed this objective.

A residential developer welcomed the recognition in Objective 3 that new housing in sustainable rural villages can reduce rural isolation by protecting and providing services. However, they suggested that the objective be expanded to make reference to sustaining and improving education provision in rural areas.

Objective 4 – To Diversify and Grow the Local Economy

A resident suggested that the situation for this objective is much the same as that stated for objective 2 [see first paragraph of ‘Objective 2’ above]. The CPRE – Fylde District commended this objective. Another resident gave particular support to part 9 of this objective, but commented that more emphasis should be given to food security. The Minority Group Report raised concerns over development impact on taking land out of food production.

In relation to Part 5 of the objective, Cllr Eastham suggested that the Fylde area could be promoted as a successful commuting asset for Preston and the wider Lancashire area.

English Heritage welcomed this objective, but was concerned that there was no definition and explanation of the classic resort concept within the Plan. English Heritage also commented that specific reference should be made to the historic environment and pick out aspects of the historic environment that are important to the Borough, along with the contribution that the historic environment makes to the local economy.

English Heritage recommended that the importance of the historic environment should be a key objective in this section, and that an additional criterion should be introduced as follows: “Recognise the importance of the historic environment and the contribution it makes to the local economy through promoting opportunities for its conservation and enhancement.”

English Heritage noted that reference is made in chapter 2 to improving the economy of Kirkham, including the quality of the built environment, but that this is not mentioned in Objective 4. English Heritage therefore questioned whether this is a key priority.

BAE Systems Real Estate Solutions agreed with parts 3 and 5 of this objective, but suggested that part 5 should read: “…BAE Systems Warton Aerodrome, Lancashire Enterprise Zone at Warton…” They also said that part 8 should make reference to the creation of Centres in need of retail and associated provision, such as Warton.

Objective 5 – To Develop Socially Cohesive, Diverse, and Healthy Communities

A resident suggested that the situation for this objective is much the same as that stated for objective 2 [see first paragraph of ‘Objective 2’ above]. In terms of “engaging and empowering local communities”, the resident commented that the consultation process that the Council has engaged in falls well below what is necessary.
A resident was concerned that the Plan does not take account of the Bryning with Warton Parish Plan; and that it is not acceptable for the Council to refer to changes in legislation requiring Neighbourhood Plans, since there has been insufficient time to allow the Parish Plan to be converted to the new format. The residents added that the Parish Plan is still valid and reflects the views of the populace of Warton.

Sport England suggested rewording part 3 of Objective 5 to “Protecting, increasing and enhancing open space sport and recreation provision throughout the Borough”. Sport England also recommended rewording part 4 of Objective 5 to “Promoting good health and wellbeing by providing accessible high quality open space sport and recreation in association with new developments.” One of the Playing Pitch Strategy scenarios will be to establish the impact of housing growth on existing and new outdoor sport provision. This in turn will inform policy recommendations and the action plan which can then be directly linked to individual housing developments. Sport England welcomed the inclusion of sports facilities in part 8 of Objective 5.

**Council response**

The comments made by Kirkham Grammar School are noted.

The Council notes United Utilities comments regarding the suggested amendment to the ‘Authority Monitoring Report’ to ‘Annual Monitoring Report’ in paragraph 4.2. However, it is no longer a requirement to prepare the Monitoring Report on an annual basis.

The Council agrees with the Environment Agency to amend the reference in Appendix 1 under contaminated land to read: “paragraphs 120 and 121” of the NPPF.

In response to the claim that the majority of the sites proposed for building in the Plan are greenfield, text in paragraph 6.2 of chapter 4: The Strategic Development Framework says: “the Strategic Housing Land Availability Assessment 2012 update (SHLAA) indicates that there is not enough available brownfield land in the Borough to accommodate all new development and sites have been identified for development on some sustainable greenfield land at the edge of existing settlements”.

The residents’ concerns about any future development in Warton are noted and are dealt with under policy SL3 in chapter 7. The Council has reviewed Parish Plans as part of the Local Plan preparation process. It will be important for the Council and Parish / Town Councils producing Neighbourhood Plans to work together to ensure they align with the Local Plan and Neighbourhood Plans.

AXA Insurance’s concern regarding the strategy for Lytham St Annes is noted.

The Council agrees with BAE Systems Real Estate Solutions that part 3 of Objective 1 should be amended to read: “Bring forward a responsive and deliverable supply of housing land…”

The Council agrees with Blackpool Council that it would be better to state “improving” the South Fylde Line, as opposed to “promoting” it under Objective 3.

The issues raised by English Heritage regarding the classic resort concept and that specific reference needs to be made to the historic environment, together with its contribution to the local economy, are dealt with in chapters 9 and 14.

The Council agrees with English Heritage that the importance of the historic environment should be a key objective in chapter 4, and that an additional criterion should be introduced as follows: “Recognising the importance of the historic environment and the contribution it makes to the local economy through promoting opportunities for its conservation and enhancement.”

The Council agrees with BAE Systems Real Estate Solutions that part 5 of Objective 4 should read: “…BAE Systems Warton Aerodrome, Lancashire Enterprise Zone at Warton...”
BAE Systems Real Estate Solutions comments that part 8 of Objective 4 should make reference to the creation of Centres in need of retail and associated provision, such as Warton are noted. However, Warton will be covered by an amended part 8 of Objective 4, i.e. “promoting the continuing improvement of the vitality and viability of the town, district / village and local centres”.

Equally, the Council considers that there is no need to refer specifically to Kirkham and the quality of the built environment in Objective 4, as it is already covered by the wording of amended part 8 of objective 4 “promoting the continuing improvement of the vitality and viability of town, district / village and local centres”.

The Council agrees to amend part 3 and part 4 of Objective 5 in line with the wording proposed by Sport England. Sport England’s support for the inclusion of sports facilities in part 8 of Objective 5 is noted.

The resident’s concerns regarding the consultation process that the Council engaged in and the claim that it fell well below what is necessary, are misplaced. The Council embarked on an 8 week consultation programme, which included public meetings and consultation events. The statutory recommended timeframe for consultations on policy documents is a minimum of 6 weeks. Consequently, the Council considers that it went out for consultation with the public, longer than the statutory timeframe.

**Recommendations for change**

- Amend part 3 of Objective 1 to read: “Bring forward a responsive and deliverable supply of housing land…”

- Amend part 3 of Objective 3 by inserting “improving” the South Fylde Line, in place of “promoting” it.

- Agree that part 5 of Objective 4 should read: “…BAE Systems Warton Aerodrome, Lancashire Enterprise Zone at Warton…”

- Amend part 8 of Objective 4 to read “promoting the continuing improvement of the vitality and viability of the town, district / village and local centres”.

- Add an additional criterion (part 10) to Objective 4 saying: “Recognising the importance of the historic environment and the contribution it makes to the local economy through promoting opportunities for its conservation and enhancement.”

- Amend part 3 of Objective 5 to read: “Protecting, increasing and enhancing open space sport and recreation provision throughout the Borough”.

- Amend part 4 of Objective 5 to read “Promoting good health and wellbeing by providing accessible high quality open space sport and recreation in association with new developments.”

- Amend Appendix 1 of the Preferred Options, which makes reference to “paragraphs 121 and 122” of the NPPF and replace with reference to “paragraphs 120 and 121”.

Chapter 5: National, Regional and Sub Regional Policy

Number of representations:

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Representations received from:

- Bryning with Warton Parish Council
- Councillor Eastham
- Lancashire County Council
- Wyre Borough Council
- Blackpool Council
- Blackpool International Airport
- BAE Systems Real Estate Solutions
- Home Builders Federation
- Wesham Action Group
- 8 Residents
- 4 Residential Developers
- 1 Mixed Use Developer

What you said

**Green Belt Review**

There were comments from residents that there should be a review of the Green Belt, and that the Green Belt boundary should move back to the position it was in from before the original bypass was proposed. Bryning with Warton Parish Council resolved that Fylde Council should consider a review of Green Belt as a matter of urgency and before final approval of the Local Plan to 2030 Part 1.

Blackpool International Airport are seeking a policy framework which provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting the Airport).

Some residents questioned why the Great Birchwood site keeps being rejected for housing, and that if the site is Green Belt land, whether or not the strategic sites at Warton are also Green Belt land? Some residents confirmed that the owners of the Great Birchwood site, which is brownfield land in the Green Belt, believe that this could and should be built on.

Some residents commented that it is too late to leave a review of the Green Belt until the Local Plan Part 2. They said that some Green Belt might be more appropriately classed as greenfield, allowing other opportunities for development. They added that Green Belt land north of Freckleton could be used for housing, as the land has good access to the Freckleton bypass and the future M55 Link Road (i.e. the Preston Western Distributor); has good bus routes; and would boost Freckleton.

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7 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
A residential developer suggested that it is the Core Strategy stage of a Local Plan that should be the stage for reviewing Green Belt boundaries, rather than on a site by site basis in the Site Allocations document; and that this is set out in the NPPF.

A mixed use developer recommended the deletion of the reference to the Regional Spatial Strategy requirement for no Green Belt review before the end of the Spatial Strategy period (to 2021), as it is out of date. They also said that the need for Green Belt review needs to be considered for the whole of the Local Plan period (to 2030). They suggested that the findings of the forthcoming Strategic Housing Market Assessment (SHMA) will have implications for the need to release land from the Green Belt.

They went on to comment that although the Plan allocates sites in the Lytham St Annes area, they consider that this is not likely to be sufficient to meet this area’s needs, and will therefore require the release of sustainable Green Belt land. They suggested a site on the edge of St Annes (Leach Lane), which they consider to be sustainable and could be released for housing without harming the Green Belt.

**Duty to Co-operate**

A resident commented that the NPPF requires the Council to provide evidence of joint working on housing delivery. The residential developers and the Home Builders Federation claimed that the Plan is not clear on how the Duty to Co-operate is being met. They particularly questioned how the needs of neighbouring authorities are being met. A residential developer therefore suggested that the Plan has not been positively prepared and cannot be considered ‘sound’.

A residential developer claimed that neighbouring councils are using the Regional Spatial Strategy housing figures, and that their housing requirements have therefore not been objectively assessed in the context of current circumstances. The Home Builders Federation and a resident both made similar comments.

Some residential developers suggested that the Council should ensure that new assessments on the housing needs of Fylde should include an assessment of unmet housing needs from Blackpool, Wyre and the Central Lancashire area. The Home Builders Federation made similar comments, and also stated that it is essential that the Council goes beyond merely consulting with neighbouring authorities, but should implement actions and have evidence of high level agreements to tackle strategic issues.

A resident commented that the extent to which the Plan makes provision for cross-boundary planning issues will be a consideration of its soundness. Some residential developers suggested that the Council should examine the issues with Kirklees Council and Hart’s Council’s Core Strategies. They added that the Council should ensure that new assessments on the housing needs of Fylde should include an assessment of unmet housing needs from neighbouring councils; and the Home Builders Federation also made similar comments.

A resident objected to the Duty to Co-operate, with particular regard to housing issues with Blackpool. The resident claimed that Blackpool have argued that they can run their own affairs and that they are a distinctively different type of Borough to Fylde. The resident also asked if Blackpool’s housing requirement will increase Fylde’s housing numbers.

Wyre Council made reference to the benefits of the Memorandum of Understanding, prepared by Lancashire County Council and the three Fylde Coast local authorities.

Blackpool Council welcomed the commitment of Fylde to provide additional employment land to meet Blackpool’s employment land needs. However, Lancashire County Council highlighted that in paragraph 5.16 the area of employment land to meet Blackpool’s requirements is 14 ha, but at paragraph 9.10 it is 15 ha. Lancashire County Council was concerned that there is a need for consistency in the figures. Blackpool Council raised no objection to the figure being rounded up to 15 ha, as this will provide greater flexibility and choice for the Fylde sub-regional economy.

**Housing Requirement**
Some residents suggested that the housing requirement is not evidence-based nor justified; and that the Preferred Options consultation should be suspended and the document withdrawn until the Council can support its own housing requirement along with detailed evidence and reasoned justification. They also claimed that the housing figures used in the consultation are obsolete; should be much lower; and should not include the shortfall since the start of the Regional Spatial Strategy period in 2003.

Wesham Action Group was concerned that the Plan talks about the revocation of the Regional Spatial Strategy, but then goes on to use the regional housing requirement, and there is no mention of how any backlog will be dealt with. The Action Group suggested that ONS statistics have not been accurate over the last 20 years, and that 306 houses per year is totally inaccurate as there never has nor will there ever be a demand for this level of housing. The Action Group also highlighted that the Minority Group Report also questions the evidence base. The Action Group suggested that the Planning Department’s approach to recent appeals, where they have withdrawn their case at Kirkham and Wesham, has shown a high level of incompetence.

A residential developer objected to the use of Regional Spatial Strategy figures when establishing the housing requirement as this is out of date and is inconsistent with national policy. They also claimed that both the SHMA and the Council’s “Defining Housing Requirements for New Homes in Fylde” are out of date, and the Home Builders Federation made similar comments. A residential developer claimed that the Regional Spatial Strategy was only applicable up to 2020/21 and therefore does not consider housing needs for the last ten years of the Plan period.

Some residential developers were concerned about the reassessment of the figures being left so late in the process. They recommended that the Council should produce an updated SHMA. Some residential developers added that the SHMA should include an assessment which considers the implications of an ageing and decreasing population for Fylde. The Home Builders Federation considered that an updated SHMA should take account of the government’s SHMA Practice Guidance, which is likely to be updated.

A residential developer claimed that using the Regional Spatial Strategy housing figure is not satisfactory, and that instead an objectively assessed housing requirement should have been identified using up to date information. A mixed use developer and the Home Builders Federation both made similar comments.

Some residential developers noted that there have been objections to the Plan’s housing targets due to population trends showing a decreasing population. However, they said that this will have a negative impact on the local economy and services; that the trend could be due to a lack of housing delivery; that the NPPF seeks to positively boost the supply of housing; and that simple reliance on past population trends is not a reliable source of information in itself to base housing needs upon.

*Other issues*

BAE Systems Real Estate Solutions recommended that within the paragraphs summarising the NPPF there should be a section on ‘Ensuring Viability and Deliverability’ (see paragraphs 173-177 of the NPPF), as this is an important principle of plan-making.

Cllr Eastham questioned whether it would be necessary to list all of the revoked Regional Spatial Strategy policies that have implications for the Local Plan in the next version of the Local Plan (Part 1).

*Council response*

The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. The Council has demonstrated through its Strategic Housing Land Availability Assessment (SHLAA) that there is sufficient land located outside the Green Belt to meet the borough housing requirement. The Council is therefore not proposing a strategic review of the Green Belt, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies.
The Council considers that the Great Birchwood site, west of Warton, could be an appropriate location for a secondary school, but there are issues with the site as it is located within the Green Belt, in Flood Risk Zone 3 and it is located some distance from the centre of Warton. The Council agreed that discussions with Lancashire County Council via the Education Liaison Group, regarding a new secondary school in Fylde, needed to be continued to establish whether there was still the need for a school and where it should be located.

In terms of the Duty to Co-operate with neighbouring authorities in the Lancashire sub-region, the Council along with the other two Fylde Coast local authorities: Wyre Borough Council and Blackpool Council, together with Lancashire County Council has produced a Memorandum of Understanding. This should ensure closer ties and joined-up thinking on the delivery of strategic planning across the Fylde Coast. The Council have close working relationships with Preston and the wider Lancashire authorities. The Council will continue to satisfy the requirements of the Duty to Co-operate and will publicise the steps that have been taken to achieve this in the AMR.

The concerns raised by Lancashire County Council are noted under paragraph 5.16 where the area of employment land to meet Blackpool’s requirements is 14 ha, but at paragraph 9.10 it is 15 ha is an omission which will be rectified. The text will be amended to refer to 14 ha.

The Housing Requirement will be updated as a result of the SHMA 2014 and the Viability Assessment 2014. Further Council comments in relation to the SHMA are available in chapter 6.

Comments relating specifically to housing development at Blackpool International Airport are dealt with under chapter 6. Comments relating specifically to commercial development at Blackpool International Airport are dealt with under policy T2 in chapter 12.

The Council agrees with BAE Systems Real Estate Solutions recommendation, that within the paragraphs summarising the NPPF there should be a section on ‘Ensuring Viability and Deliverability’ (see paragraphs 173-177 of the NPPF).

The Council included relevant revoked Regional Spatial Strategy policies in the Preferred Options document of the Local Plan to provide a context; it is not proposed to include this information in the next version of the Local Plan.

Recommendations for change

- Add new paragraph 5.2a of the Preferred Options document saying: “In accordance with the NPPF, the local plan should be deliverable and necessary infrastructure, to deliver the proposed development in the Local Plan, will be provided in a timely fashion.”

- Amend paragraph 5.12 of the Preferred Options document to read: “The local authority areas of Blackpool, Wyre, West Lancashire, Preston (Central Lancashire Authority) and South Ribble (Central Lancashire Authority) are adjacent to Fylde Borough”.

- Retain the reference in paragraph 5.16 of the Preferred Options to “14 ha of employment land within the Fylde boundary, to meet Blackpool’s requirement up to 2027”.

- Delete the section on “Policies of regional importance”, which includes the revoked Regional Spatial Strategy policies from chapter 5, as it is not proposed to include this information in the next version of the Local Plan.
**Policy NP1: Presumption in favour of sustainable development**

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Representations received from:

- Ribby with Wrea Parish Council
- Highways Agency
- Kirkham Grammar School
- 1 Retail Developer
- 35 Residents
- 4 Residential Developers

**What you said**

Residents suggested that this policy does not explain sufficiently strongly or clearly what should be regarded as sustainable development in the context of Fylde. They said that this should be clearly and unambiguously set out following a thorough consultation with Fylde residents about what ‘sustainable’ means.

A resident commented that their understanding of ‘sustainable’ is also to maintain existing environments and buildings for future generations. The resident provided an example that the roads and pavements are in poor repair and that builders have damaged streets. The resident also commented that the countryside is worth caring for. Another resident suggested that working exclusively with developers on pre-application advice breeds distrust within the community and frequently results in protests that can be costly and avoided if community involvement takes place as part of the pre-application process.

Ribby with Wrea Parish Council suggested that sustainability is a key ingredient, and that it is essential that realistic and defensible development assessments are made, and that amenities that will not benefit the local community are not provided.

Two residential developers said that they support the inclusion of policy NP1 as it conforms to the NPPF and it recognises the need to boost significantly the supply of housing in sustainable locations. A residential developer added that the Council needs to ensure that other policies in the Plan do not contradict this presumption in favour of sustainable development.

Two residential developers said that they support the content of policy NP1. A retail developer supported policy NP1 and welcomed this positive and proactive approach to considering development proposals.

The Highways Agency supported the general principle of taking a positive approach towards the presumption in favour of sustainable development and the intention to engage proactively with applicants to find solutions to proposals to secure developments in the Borough.

Kirkham Grammar School confirmed that the school Governors are committed to working with the Council to bring forward sustainable development on the schools playing fields on site M3.

[^8]: Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
Council response

The NPPF suggests the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking. The NPPF refers to the Brundtland definition of sustainability and goes on to refer to the “policies in paragraph 18 to 219 (of the NPPF), taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system”.

Sustainable development is a ‘golden thread’ which runs through the emerging Local Plan. The Council will include a statement in chapter 1 that the Local Plan should be read as a whole.

The comments made by Ribby with Wrea Parish Council, the Highways Agency and Kirkham Grammar School are noted.

The support given by the retail developer is noted. The support given by some residential developers to the policy is supported.

Recommendations for change

- None
Chapter 6: The Spatial Development Framework

Chapter 6 General Comments:

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Representations received from:
- English Heritage
- Campaign to Protect Rural England (CPRE) – Fylde District
- Home Builders Federation
- BAE Systems Real Estate Solutions
- Treales, Roseacre and Wharles Parish Council
- Ribby with Wrea Parish Council
- Bryning with Warton Parish Council
- Elswick Parish Council
- Singleton Parish Council
- Councillor Eastham
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Councillor Hardy
- Lytham St Annes Civic Society
- The Minority Group Report
- Blackpool Council
- South Ribble Borough Council
- Wyre Borough Council
- Blackpool International Airport
- AXA Insurance
- 15 residential developers
- 2 Action Groups
- 173 Residents

What you said

**Housing requirement**
The majority of comments received in relation to chapter 6 focused on the housing requirement, suggesting the figure was too high or too low.

Elswick Parish Council suggested the annual housing requirement of 341 per year is excessive, considering employment is in decline and the borough has a higher mortality than birth rate. The figure is partly linked to migration into the borough, however shale gas exploitation may effect this trend. Houses should be built close to areas of employment, reducing congestion and use of carbon fuels. A resident also suggested shale gas exploration will reduce immigration into Fylde.

Treales, Roseacre and Wharles Parish Council questioned the housing forecast evidence which is out of date (pre- recession) and no longer supported (Regional Spatial Strategy). Up to date population and

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9 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
housing forecast modelling which is transparent should be incorporated into the Local Plan. The Parish Council questioned the level of consideration of the type and density of dwellings needed for the demographic characteristics of the Fylde Coast e.g. Retirement, and the level of considerations to deterioration of housing stock and redevelopment.

Bryning with Warton Parish Council questioned the housing requirement methodology and rational for justifying the Preferred Options housing requirement, reference was made to current vacant and available housing in the area. The Parish Councils response stated they and a large proportion of residents support necessary proportional housing development within the village, which meets the principles of ‘Sustainable Development’. The Parish Council referred to GEC Marconi and Nine Acres nursery sites which they claim will far exceed the local requirement. They also suggested the development is proportionally more than any other village in the borough, despite a lack of infrastructure. Warton should remain a village. Any proposed development should be suspended pending approval of the Local Plan and Neighbourhood Plan. Affordable housing should only be to meet the needs of the settlement.

Ribby with Wrea Parish Council were generally in agreement with the draft Local Plan, however, the most up to date housing requirement calculations should be used, which is key for an area with inward migration. The Parish Council agreed with the Minority Group Report.

CPRE – Fylde District suggested that paragraph 6.20 of the Preferred Options document misrepresents the 2011 ONS household projections, when in fact, the 2011 projections are lower than the Preferred Option. CPRE – Fylde District and many residents said that any new assessment from a new baseline should not include the deficit since 2003. Residents suggested the past housing requirement(s) were over-estimated which has led to the current deficit.

In relation to the housing requirement, The Minority Group Report commented that the demographics show that more people are dying than are born in Fylde and household fragmentation is not as great as is shown. Fylde should not lose too much greenfield land to accommodate inward migration. The Fordham Housing Need Assessments inflated housing need. New ONS statistics need to be taken into account and smaller house sizes due to elderly residents should be factored in. The evidence base overstates the need.

An action group suggested the housing requirement is not supported by the most up-to-date information, they also suggested the evidence indicates a lower figure.

Lytham St. Annes Civic Society suggested that the need to build houses should not override other considerations. The civic society also raised concerns over housing requirement.

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors considered that empty properties, including refurbishments should be given greater priority. If the housing demand was great, there would be fewer empty properties. This suggests the housing requirement needs revisiting.

Residents questioned whether the existing calculations include all existing planning permissions, including schemes which are yet to be built. Many residents said the housing requirement is too high, and higher than that proposed in the Issues and Options document. Bringing empty homes back into use to increase supply was suggested. Another resident suggested past build-out rates should be rolled forward as the boroughs housing requirement as this is what the market has delivered. A resident said the housing requirement should consider the age shift in its modelling, with a growth in elderly residents requiring small units, occupying fewer green fields.

Wyre Borough Council referred to the jointly commissioned SHMA and suggested the Council should have regard to the findings in setting the housing provision for Fylde in the Local Plan.

Residents and residential developers were concerned that the housing evidence base is not being dealt with until the next change which may lead to fundamental changes to the Preferred Options document.
The Home Builders Federation and many residential developers suggested the housing requirement is out of date and not based on latest evidence, with the overall supply of 306pa too low. Residential developers suggested that the requirement does not fully meet the objectively assessed needs of the borough as the affordable housing requirement is far in excess of the likely delivery rate in the Local Plan. A new SHMA was suggested to inform the Council.

The Home Builders Federation encouraged the Council to involve members of the local development industry in the production of the housing evidence to provide realistic views of the local market and development costs. In producing the evidence, they suggested that past delivery should not be rolled forward as previous strategic policy has impeded development.

Some developers suggested the current housing requirement does not meet economic projections to support the economy. It was suggested that perceived infrastructure constraints do not justify a lower housing requirement. Fylde has a very low supply of housing and this shortfall should be taken into consideration.

A residential developer suggested that the housing requirement is not explicitly stated in any plan policy. The Home Builders Federation and developer suggested the housing requirement and provision should both be shown as net in the plan.

Blackpool Council suggested the Local Plan should clarify that the percentage of residential development referred to new development.

Blackpool International Airport are seeking a policy framework which provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting Blackpool International Airport).

Plan Period
CPRE - Fylde District commented on the plan period, suggesting reference to a 20-year period is inconsistent and leads to misleading comparison with the ONS 2011 projections.

A number of residential developers also questioned the plan period and that it should be explicitly set out from the outset, the title of the plan should be altered to reflect this.

Economic Viability
The Home Builders Federation, residential developers and residents questioned the lack of an economic viability appraisal of the cumulative impact of plan policies and obligations on viability and deliverability of the plan. Concerns were raised that this evidence was not being dealt with until the Publication stage which may lead to fundamental changes to the document.

Deliverability
A resident suggested that large schemes, such as Whyndyke Farm should be fully delivered in the plan period, reducing the amount of greenfield sites. Another resident questioned why the Local Plan shows a lower level of dwellings compared to the approved schemes and pending applications at Queensway and Whyndyke Farm respectively.

The Home Builders Federation and some residential developers questioned the deliverability of the Local Plan, with a reliance on a small number of larger strategic sites, with the failure of one or more sites compromising the plan. A significant element of flexibility should be built into the plan.

Employment Requirement
Many residents questioned whether there is an oversupply of employment land, suggesting the surplus could be used for housing, avoiding the need for greenfield sites.
Treales, Roseacre and Wharles Parish Council suggested land within the Lancashire Enterprise Zone, BAE Systems, Warton should be included in the borough employment land requirement, avoiding the need to release greenfield sites.

Heritage

English Heritage welcomed references in paragraph 6.6 and 6.16 to retaining Fylde’s distinctive local characteristics and unique qualities.

English Heritage raised concerns over no reference to the impact of development on the historic environment and opportunities to enhance, with a suggestion to amend paragraph 6.3 to read ‘enhance Fylde’s historic, environmental, social and economic assets’. English Heritage suggested an assessment should be made to identify land, which would be inappropriate for development because of its historic significance. An assessment is needed to define what is important and assess the contributions it makes to the character of the area and to inform the retention of the Borough’s unique qualities.

Previously Developed Land (Brownfield)

BAE Systems Real Estate Solutions suggested future SHLAA updates may identify additional brownfield land which could contribute towards the housing land supply. It is suggested that Warton is identified as a broad location for growth which could include brownfield land without it identifying specific sites, in line with paragraph 47 of the NPPF.

Many residents suggested brownfield land should be given development priority over green field sites.

Green Belt

A residential developer suggested that the Council would not be able to conclude if a Green Belt review was needed until the SHMA findings were available. Green Belt release may be required to meet the need in sustainable locations. Green Belt review should be undertaken in Part 1 of the Local Plan. The residential developer suggested a site at Leach Lane, St Annes for consideration.

Key Service Centres

Blackpool Council in relation to paragraph 6.8 sought different terminology to differentiate the role of the Fylde-Blackpool Periphery from Lytham, St Anne’s and Kirkham.

BAE Systems Real Estate Solutions suggested section 6.8 should be clear that Warton will become a Key Service Centre as referred to in Appendix 2. Warton already contains many of the attributes of a Key Service Centre, with a range of housing and significant employment opportunities.

Windfall and small sites allowance

CPRE – Fylde District questioned whether the windfall allowance included conversions as historically conversions alone account for 30 dwellings per annum. They also pointed out that 31% of the boroughs requirement will be required on unallocated sites (windfall and small sites).

A residential developer raised concern over no evidence to justify inclusion of a windfall allowance at 30 dwellings per annum.

A residential developer questioned the inclusion of a windfall allowance, and referred to the recent Inspectors decision on the Selby Core Strategy where the allowance was removed from annual plan targets and added as a buffer. Some residential developers suggested the windfall allowance should not be included beyond the first 5 years of the plan period as it reduces certainty and goes against paragraph 47 of the NPPF.

A residential developer suggested that the plan lacked clarification as to which settlements are included within the windfall allowance and questioned the distribution across rural villages.
A developer / landowner supported the distribution of small sites and windfall allowance across the plan period, suggesting in reality that windfall would account for the greater amount of allowance in years 1-6, with small sites higher following adoption of Part 2 of the Local Plan. Windfall and small sites should be separate categories to reflect this.

**Rural settlements**
A residential developer suggested that there should be a greater proportion of growth made up at more sustainable rural settlements, this would assist in addressing the acute need for affordable housing and promote social inclusion.

**Five Year Supply**
The Home Builders Federation and many residential developers suggested that the housing deficit should be met in the first five years of the plan. It was suggested that the five year supply is a minimum and a 20% buffer is required due to persistent under delivery in Fylde. It was suggested that the housing requirement does not include the 20% buffer on the housing requirement.

A residential developer suggested the five year supply methodology is flawed and not clear in the Preferred Options document.

**Broad Distribution of Development to 2030 Table**
A residential developer questioned the dwellings supply in year 1-6 in the table which does not provide a five year supply. An inconsistency in the figure in year 1-6 in the table and the trajectory was also mentioned.

A residential developer suggested the gross distribution table should include the distribution figure for rural and small villages so that applications can be considered in accordance with that figure ahead of the allocations document.

**Planning applications**
Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested no further large scale residential applications should be approved until existing permitted schemes are built out. The length of approval should be reduced or conditions used to ensure substantive phases of the development take place. Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors went on to suggest that it is pointless having an agreed plan if the policies are not informing decision making, e.g. recent approval of residential accommodation in a designated tourism area (TREC 1).

**Consultation**
Treales, Roseacre and Wharles Parish Council suggested there should be a formal presentation of the proposed option in the same way as conducted for the original 5 options offered in previous consultations.

Cllr Eastham questioned whether it is appropriate to include ‘what you said’ and ‘alternative options considered’ in the next version of the Local Plan (Part 1).

**Duty to Co-operate**
South Ribble Borough Council would like continued involvement on cross boundary issues and to be kept informed of emerging minerals safeguarding polices on topics such as shale gas exploration and whether this may impact on Special Protection Area / Ramsar sites at the Ribble and Alt Estuary. South Ribble Borough Council claimed that the minerals safeguarding map within the Preferred Options document is unclear / too small.

**Lytham St Annes**
AXA Insurance agreed that the existing urban area is not able to supply enough sites to satisfy the development needs of Fylde. AXA Insurance is willing to bring forward land in its ownership on the edge of the urban area to deliver more housing.
Fylde-Blackpool Periphery
Singleton Parish Council re-stated their preference for option 5, with housing located at Whyndyke Farm and industrial located at the B & Q site.

There was support from residents for development at the Fylde-Blackpool Periphery. An action group stated that the wastewater capacity should be resolved to make Whyndyke Farm development viable.

A residential developer suggested development at the Fylde-Blackpool Periphery would operate as part of Blackpool’s housing market and not Fylde’s.

Warton
There was support from some residential developers for the inclusion of their land in Warton for residential development. They also suggested that their site could deliver higher numbers of dwellings than the Preferred Options propose.

Many residents were against development at Warton because of the lack of infrastructure; poor transport access even after the construction of a new junction 2 on the M55; the destruction of village identity; build-out rates will not provide sufficient time for infrastructure provision; development is disproportionate; increasing the number of residents will not increase service provision which is available at neighbouring service centres.

Kirkham and Wesham
Some residential developers suggested there should be a higher proportion of development at Kirkham and Wesham. A residential developer questioned why the distribution is lower at Kirkham and Wesham and higher at Warton than the options put forward at Issues and Options stage. It was suggested that proposals to strengthen Kirkham as a key service centre is not undermined by Warton development.

A residential developer suggested Kirkham and Wesham should be considered as one settlement for the purposes of spatial planning policy.

Council response

Housing requirement
Many comments were received to chapter 6 and throughout the Preferred Options document objecting to the housing requirement. Many respondents commented that the evidence was out of date, some respondents thought the figure used was too high, others said it was too low.

Fylde, Blackpool and Wyre Councils jointly commissioned a Fylde Coast Strategic Housing Market Assessment (SHMA) which was published in June 2014, replacing the SHMA 2008 which is out of date. It is intended that the Council will use the findings of the new SHMA to inform the next version of the Local Plan.

The new SHMA provides an up-to-date evidence base of housing needs and demand across the Fylde Coast. It provides evidence of how many dwellings of different tenures will be needed over the next fifteen years and beyond. The SHMA will also enable a greater understanding of the dynamics and drivers of the sub-regional housing market, and will allow the identification of actions that will help to deliver better housing and socio-economic outcomes for those living in the Fylde Coast sub region.

The objectively assessed need for Fylde lies between 300-420 dwellings per annum. Fylde Council will use evidence provided in the new SHMA as a starting point in developing a local housing requirement figure for Fylde. However, both the NPPF and the NPPG make it clear that the housing figure must be developed in conjunction with economic aspirations and the need to provide affordable housing. For Fylde, the new SHMA identifies a need for 207 affordable dwellings per year (this number forms part of the objectively assessed need).
The Draft Local Housing Requirement Paper takes account of the findings of the SHMA, the NPPF, the NPPG, and adopted and emerging Fylde Council policy. It also considers local issues including economic growth, the Lancashire Enterprise Zone, levels of in-commuting, historical delivery and type and tenure of housing required. Technical issues of supply such as the amount of deliverable land available, infrastructure and the relationship between the supply of land allocated / with permission and completions plus backlog are also factored into the decision making process.

Once the new figure has been agreed, it will be used to determine how much land will be allocated for housing development in the next version of the Local Plan (Part 1) to the year 2030. In relation to the housing requirement and evidence, the Council agrees to add a new policy in chapter 10, which deals with the housing, similar to the approach taken in policy EC1 in chapter 9 of the Preferred Options document which sets out the overall provision of employment land.

In response to the comments made in the Minority Group Report to housing requirement, Fylde Borough Council has commissioned a new SHMA which identifies that there is a net loss of population in Fylde due to natural change, i.e. the death rate is higher than the birth rate. However, due to inward migration the 5 year and 10 year based trends indicate that the population of Fylde Borough is increasing. The NPPF requires local authorities to take account of migration and demographic change in assessing housing need (paragraph 159). The new SHMA also addresses household formation figures. The Fylde Borough Housing Needs and Demand Study update 2007, carried out on behalf of the Council by Fordham Research, has not been carried forward in the formulation of the Preferred Options document. The provision of Affordable Housing in the Preferred Options document is based upon the Fylde Housing Needs Assessment 2012. The new SHMA also provides an additional assessment of the need for affordable dwellings. The NPPF requires local authorities to take account of migration and demographic change in assessing housing need (paragraph 159). In searching for potential residential development sites for inclusion within the Preferred Options document, the Council has prioritised the re-development of previously developed land. However, it is recognised that the fully assessed housing need will not be able to be accommodated within the previously developed sites that are available within Fylde and so additional greenfield land will need to be allocated. The updated SHMA utilises a base date of 2011, which is in alignment with the start of the local plan period. Accordingly, it is proposed that the next version of the Local Plan (Part 1) will be based upon a locally derived housing figure, which will not need to include provision for under-performance in previous years. The updated SHMA takes account of the household formation rates for Fylde which, in turn, are based upon an analysis of the age structure of the borough. The modelling of future need is considered to be appropriate and in line with national guidance.

Five Year Supply
The new housing requirement figure will not include a buffer. The buffer does not actually increase the total amount of housing which must be provided i.e. the housing requirement. It simply increases the amount of housing that should be provided earlier in the plan period to make up for a previous backlog. There will be no backlog because of the use of up-to-date data to derive a new figure which will be used from the beginning of the plan period.

The Council acknowledges persistent under-delivery of housing in Fylde and that a 20% buffer is currently required for the purposes of calculating a five year supply. The NPPF paragraph 47 is clear that the 20% buffer does not increase the borough’s housing requirement, but moves forward development from later in the plan. The Council has published an updated five year supply statement on its website which has a base date of 31st December 2013.

In response to the claim about banking permissions, the Council has no control as a Local Planning Authority over the banking of planning permissions. However, the Housing Requirement Paper explores the relationship between the supply of land allocated / with permission and completions.

Comments relating Green Belt review at Blackpool International Airport are dealt with under chapter 5.

Comments relating specifically to commercial development at Blackpool International Airport are dealt with under policy T2 in chapter 12.
The Council agrees to add a further criterion to policy SD1 to deal with impacts on airport safety, hazardous areas and pipelines.

**Plan Period**
CPRE - Fylde District commented on the plan period, suggesting reference to a 20-year period is inconsistent and leads to misleading comparison with the ONS 2011 projections.

A number of residential developers also questioned the plan period and that it should be explicitly set out from the outset, the title of the plan should be altered to reflect this. The Council agrees that the plan period could cause confusion and agrees to amend it to reflect the 19 whole year period from 1st April 2011 to 31st March 2030. The Plan Period will be set out more explicitly in chapter 1 at the start of the document and reference will be made to a 19 year period throughout the plan.

**Economic Viability**
The viability study was carried out on the Preferred Options document, so as to check if the plan was deliverable; if there are fundamental changes to the Local Plan (Part 1) the Council will undertake a revised Preferred Options consultation.

**Deliverability**
The Local Plan sets out development in the borough up to 2030. Larger schemes such as Queensway are not expected to complete until after the end of the plan period. Therefore, the number of dwellings identified for Queensway in the Preferred Options document are those dwellings deliverable in the plan period only.

The Home Builders Federation and some residential developers questioned the deliverability of the Local Plan (Part 1), with a reliance on a small number of larger strategic sites, with the failure of one or more sites compromising the plan. A significant element of flexibility should be built into the plan.

**Employment Requirement**
Comments in relation to the over-supply of employment land and inclusion of land at Lancashire Enterprise Zone, BAE Systems, Warton, within the borough’s employment land requirement are dealt with in chapter 9.

**Heritage**
The Council agrees to include reference to the impact of development on the historic environment in paragraph 6.3 of the Preferred Options document. Comments in reference to identifying inappropriate land for development and an assessment of character are dealt with in chapter 14.

**Previously Developed Land (Brownfield)**
The Strategic Housing Land Availability Assessment (SHLAA) Practice Guidance (2007) states that the SHLAA should identify as many sites with housing potential in and around as many settlements as possible. As a minimum, it should aim to identify sufficient specific sites for at least the first 10 years. Where it is not possible to identify specific sites, it should provide the evidence base to support judgement around whether broad locations should be identified. The borough’s latest SHLAA (2012) has identified sites in and around settlements for over 21,000 dwellings, far in excess of 15+ year supply, therefore, the Council does not need to identify broad development locations. The Council continues to accept new sites for future SHLAA assessments and encourages BAE Systems Real Estate Solutions to identify specific sites for consideration.

Many residents suggested brownfield land should be given development priority over green field sites. The Council’s response to comments in relation to brownfield land should have priority over greenfield sites is provided under policy GD1 in chapter 8.

Text in paragraph 6.2 says: “the Strategic Housing Land Availability Assessment 2012 update (SHLAA) indicates that there is not enough available brownfield land in the Borough to accommodate all new development and sites have been identified for development on some sustainable greenfield land at the
edge of existing settlements”. The NPPF does not require the development of previously developed land (brownfield) first. There are no longer sub-regional previously developed land (brownfield) targets.

Part 4 of Objective 1, in chapter 4 says: A sustainable approach to housing will be taken. This will: “make the best use of previously developed land and buildings, subject to appropriate site investigation and remediation where required, to reduce the loss of greenfield land”.

Policy GD1, in chapter 8 encourages the efficient use of land, prioritises development within settlement boundaries and previously developed land, subject to other relevant Local Plan policies being satisfied.

NPPF guidance says Local Planning Authorities may continue to consider setting locally appropriate brownfield land targets. The Council has questioned the need for a previously developed land target. The Borough has very low levels of previously developed land. Previously developed land which has come forward historically are generally windfall sites.

Green Belt
Comments in reference to Green Belt review are provided in chapter 5. As specified in chapter 5, the Council considers that there is no need to review the Green Belt boundaries, or to release land from the Green Belt for development for the whole of the Local Plan (Part 1) period (to the year 2030).

Further Site Suggestions
Further site suggestions proposed by developers, landowners and residents are dealt with in appendix 2.

Key Service Centres
The Council considers that Fylde-Blackpool Periphery will become a local centre by the end of the plan period.

Warton is going to become a Local Centre (settlement hierarchy) over the life time of the local plan, as recognised in the Spatial Vision, as set out in chapter 3. The economic growth generated by the activity at the Enterprise Zone will result in a resurgent housing market, together with the development of a vibrant Village Centre (retail hierarchy) in Warton.

Windfall and small sites allowance
The windfall and small sites allowance accounts for 31% of the boroughs housing requirement. At the base date of the Preferred Options trajectory, 39% of the allowances are existing commitments, 37% are a small site allowance to be allocated in the Local Plan Part 2 and 24% are a windfall.

The Council considers that the fabric of the borough suggests that there is potential for windfalls moving forward. In support of this, the Council is developing a background paper to validate windfall allowance inclusion in the annual housing supply. The background paper will address the issues and concerns identified at the Preferred Options consultation.

Rural settlements
Comments in relation to sustainable rural settlements making up a greater proportion of the boroughs housing requirement is addressed in chapter 10.

Broad Distribution of Development to 2030 Table
An updated housing trajectory will be produced for the next version of the Local Plan, which will resolve the omission between the distribution table and housing trajectory.

The Council does not propose to determine the distribution of small sites until the Part 2 Local Plan. It is important to note that the small sites are not a rural allocation, small sites may also be found within the strategic locations.
Planning applications
While we encourage developers to take schemes forward through a plan led approach, the Local Planning Authority has to continue to determine planning applications while the emerging Local Plan is being developed. The Council cannot stop determining planning applications until the emerging Local Plan is finalised and adopted, therefore development schemes may be approved or refused in Fylde before the adoption of the emerging Local Plan.

Planning law requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Consultation
The comment in relation to the consultation events is addressed in the summary of consultation.

The Council does not propose to include ‘what you said’ and ‘alternative options considered’ in the next version of the Local Plan. These sub-headings were provided in the Preferred Options document for transparency, allowing the reader to see how previous comments have been taken forward and which alternative options were considered and discounted.

Duty to Co-operate
The Council will continue to co-operate on cross boundary issues with neighbouring authorities. Comments in relation to the minerals safeguarding map are addressed in chapter 1 of this report.

Lytham and St Annes
Comments in relation to Lytham and St Annes are addressed in chapter 7, under policy SL1.

Fylde-Blackpool Periphery
Comments in relation to the Fylde-Blackpool Periphery are addressed in chapter 7, under policy SL2. The Members’ have decided to rename ‘Blackpool Periphery’ as “Fylde-Blackpool Periphery” and this new name will be taken forward and be used in the next version of Local Plan (Part 1).

Warton
Comments in relation to Warton are addressed in chapter 7, under policy SL3.

Kirkham and Wesham
The Council does not agree with a residential developer’s suggestion that Kirkham and Wesham should be considered as one settlement. Kirkham and Wesham are two separate settlements, which share a common boundary. Local residents have re-iterated this point in previous consultations.

In its draft form, policy M2 of the Lancashire Minerals and Waste Site Allocations and Development Management Development Plan Document identified peat as one of a number of safeguarded minerals, and areas of peat were included in the draft Minerals Safeguarding Area maps. However, during the Examination in Public, the Inspector questioned whether peat was a mineral in light of the publication of the NPPF. Following the publication of the Inspector’s report into the Minerals and Waste Local Plan, peat has been removed from the adopted policy and the maps. Consequently, the Minerals and Waste Local Plan no longer refers to peat deposits and peat is no longer safeguarded as a mineral. As a result, the Fylde Local Plan does not need to refer to the requirements of policy M2 in terms of safeguarding peat deposits. Consequently, the Minerals Safeguarding Areas map in chapter 1 will be updated with the removal of peat deposits.

Recommendations for change

- Include the housing requirement within policy in chapter 10.
- Housing requirement and distribution net not gross.
• Clarify percentage of residential development at strategic locations is new development.

• Amend the Plan Period to 19 whole years: 1st April 2011 to 31st March 2030. Plan Period to be clearly stated at the start of the document.

• Amend paragraph 6.3 of the Preferred Options to read “enhance Fylde’s historic, environmental, social and economic assets”.

• Develop a windfall and small sites allowance background paper to tackle issues raised.

• Updated housing trajectory, including rectifying omission between gross distribution table and housing trajectory.

• Percentage of residential development should refer to new residential development.

• Explanation is needed to clarify that Queensway will not be completed within the Plan period.

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Policy SD1: The Spatial Development Framework

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Representations received from:

• Environment Agency
• English Heritage
• Highways Agency
• Home Builders Federation
• Blackpool Council
• Lancashire County Council
• Elswick Parish Council
• Greenhalgh with Thistleton Parish Council
• Medlar with Wesham Town Council
• Ribby with Wrea Parish Council
• Treales, Roseacre and Wharles Parish Council
• Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
• BAE Systems Real Estate Solutions
• Kirkham Grammar School
• Warton Typhoons Football Club

10 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
• 10 residential developers / landowners
• 302 Residents

What you said

Policy wording
BAE Systems Real Estate Solutions suggest paragraph 1 should include ‘contribute towards growth’ as well as the continuation and creation of sustainable communities.

Medlar with Wesham Town Council, with one exception, support the Minority Group Report.

Rural and Small Villages
Elswick Parish Council suggested there are significant differences between the villages listed as ‘rural villages’. The villages of Singleton, Elswick and Weeton are considerably less sustainable than other villages which are adjacent to larger conurbations.

Ribby with Wrea Parish Council was generally in agreement with the Draft Local Plan, however they raised concerns over the settlement boundaries and Green Belt / Countryside policy being positively and vigorously defended before the emerging Local Plan is adopted.

Residential developers queried whether rural and small villages are included within the strategic locations for development as they appear under the same sub heading.

The Home Builders Federation and residential developers raised concerns over a restriction on residential development in villages until the Part 2 Site Allocations, without a 5 year supply, the Council may find this stance difficult to defend. Reference to “if other material consideration outweigh this policy” should also refer to draft policy NP1, Presumption in favour of sustainable development.

A residential developer sought clarification that the policy refers to “within rural areas development will be restricted to the Rural Villages”, however the justification in paragraph 6.28 places the restriction on smaller villages.

A residential developer suggested Little Singleton should be categorised as a rural village as it is larger than Singleton and has the same development potential. A lack of community facilities does not justify Little Singleton’s exclusion, Warton is included despite the Council acknowledging a lack of community facilities. Reference to NPPF paragraph 55 and Little Singleton’s relationship with Singleton was also used as a justification.

A residential developer sought safeguards to protect and support key communities facilities and services in existing rural settlements while Part 2 of the Local Plan is produced and adopted. The Council should be committed to maintaining sustainable communities by partnership working with all appropriate agencies to prioritise essential funding support for infrastructure where deficiencies or difficulties arise.

A residential developer suggested that the Issues and Options document should refer specifically to the delivery of new homes in the rural areas, the Preferred Option does not make this distinction and is considered to be an omission. The Preferred Option document provides little information on delivering rural new homes, except that it will be provided in Part 2. It could be considered that Windfall and small sites could be allocated within the Strategic locations, which leads to confusion. The distribution table should use the same wording as in policy SD1. A residential developer questioned what non-strategic allocations would occur at the Strategic Locations.

Heritage
English Heritage raised concerns over no reference to the impact of development on the historic environment and opportunities to enhance. English Heritage suggested an assessment should be made to identify land, which would be inappropriate for development because of its historic significance. English
Heritage suggested the policy would benefit by making reference to landscape setting and not just settlement ‘scale and character’.

English Heritage suggested the justification to policy SD1 would benefit from specific reference to the historic environment and local character with regards to development locations. The Plan should be expanded to include reference to the historic environment in considering the impact of strategic development locations.

**Flooding**

Lancashire County Council, as a lead local flood authority, stated that support for strategic sites H1, H2, H3 and H7 is dependent on the sites meeting the relevant tests set out in NPPF technical guidance. The allocations appear to contradict policy SD1 which prohibits development within Flood Risk Zones 2 or 3.

The Environment Agency recommended an amendment to the policy to read ‘Inappropriate development will not be permitted in Flood Risk Zones 2 or 3’. This will ensure development that is appropriate in Flood Risk Zones in accordance with NPPF Technical Guidance will not be prevented.

A residential developer opposed reference to ‘no development being permitted within Flood Risk Zones 2 and 3’, arguing that some development is suitable in Flood Risk Zones 2 and 3 and the Sequential and Exceptions Test in NPPF Technical Guidance should be used to determine the appropriateness of each individual development and its location in regards to flood risk issues.

Residents questioned why no development was proposed for Freckleton due to Flood Risk but development at Warton would be at risk from flooding.

**Infrastructure**

The Highways Agency is generally supportive of focusing new development towards larger settlements and supports the defined strategic locations for development as the main focus for growth. The Highways Agency recognised high car ownership in Fylde, reflecting personal transport in rural areas. The Highways Agency therefore welcomed smaller settlements providing the focus for small scale development. Whilst the Highways Agency supports the aspiration for economic growth, it does so on the basis that the implications of economic growth have been adequately considered.

**Evidence base**

Residential developers suggested the evidence base is out of date, this should have been dealt with before the Council’s Preferred Options were established. Residents also suggested this and a review of the allocations may be required.

**Housing Delivery**

An inconsistency in the figure in years 1 - 6 in the distribution table and the trajectory in appendix 2 was mentioned for Warton by a residential developer.

A residential developer referred to the need to deliver the housing deficit over 5 years rather than the remainder of the plan period to ‘significantly boost’ housing supply. Reference to the need for a 20% buffer was also mentioned.

A residential developer suggested the delivery rates for individual sites were too high.

A residential developer questioned the inclusion of a windfall allowance.

A residential developer raised concerns over the deliverability of the strategic site allocations considering only four of the schemes have permission, and many are yet to submit reserved matters or discharge conditions. This raises uncertainty over the delivery of the strategic sites in the short term.
Housing, employment and leisure requirement
CPRE – Fylde District suggested the strategic locations for development meet the perceived housing and employment land requirements which is overstated. If the base figures were reduced, the number and/or size of the proposed sites could be reduced, saving valuable greenfield and open countryside.

The CPRE – Fylde District suggested that using ONS 2011 projections, disregarding the Regional Spatial Strategy deficit and using realistic achievable build rates, the overall number of new homes required in the plan would be substantially lower.

The CPRE – Fylde District suggested taking any of the six normal statistical measures from the Employment Land and Premises Study, rather than projecting the past trend of allowing greenfield sites for employment.

Lytham and St Annes
Blackpool Council are surprised that no new employment land is being proposed at Lytham St Annes considered the scale of the proposed new housing.

Fylde-Blackpool Periphery
Blackpool Council suggested the reference to Norcross in the Blackpool Periphery is misleading as no strategic development is being proposed at Norcross.

Residents questioned the “Blackpool Periphery” name, suggesting “North West Westby with Plumptons” as an alternative.

Some residents suggested Option 5, which focuses development to the Fylde-Blackpool Periphery, was the most popular option put forward at the previous consultation. The Council should not use infrastructure to justify a lower figure compared to Issues and Options. The Council should not be allocating sites based on existing infrastructure. Infrastructure issues should be resolved by the relevant infrastructure provider.

Warton
Many residents suggested Warton should not be a Strategic Location for Development:
- Warton is not a sustainable site for further large scale development;
- Infrastructure insufficient for housing development and new secondary school;
- Housing demand will not increase due to employment at new Enterprise Zone;
- Too many houses for sale / depreciation of current house prices;
- Development of Warton and facilities would have a negative impact on existing retail centres at Kirkham and Freckleton which currently serve the surrounding area as Service Centres;
- Unresolved surface water drainage problems / low lying land / flooding;
- Loss of community spirit
- Loss / threat to wildlife;
- Loss of Bridges Playing field
- Development at Warton is unbalanced compared to other settlements

BAE Systems Real Estate Solutions agreed that Warton should be identified as a strategic location for development. They suggested the section should be explicit about its aim for Warton to become a key service centre during the plan period. They also suggested the inclusion of BAE Systems land to the north within the settlement boundary.

There was support from residential developers that Warton is a sustainable location for development.

CPRE – Fylde District suggested Kirkham, Wesham and Warton have already seen significant development in proportion to their size and sustainability. These settlements along with other small rural settlements could take more modest development, preferable within the settlement boundaries through windfall and small allocations over the plan period.
Kirkham and Wesham
A residential developer supported Kirkham as a key service centre.

Kirkham Grammer School supported Kirkham and Wesham as a strategic location for development.

A residential developer supported the identification of the Mill Farm site within Kirkham and Wesham Strategic Location for Development.

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested the underlying geology should be considered to avoid future maintenance cost of roads laid over sand and peat.

CPRE – Fylde District suggested Kirkham, Wesham and Warton have already seen significant development in proportion to their size and sustainability. These settlements along with other small rural settlements could take more modest development, preferably within the settlement boundaries through windfall and small allocations over the plan period.

Consultation
Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested as the Local Plan will guide future development within Fylde, it is important that it is accepted by our communities and it commands the widest support from Councillors and residents.

A residential developer suggested the grouping of settlements in the Issues and Options document differs from the Preferred Option, which makes it difficult to compare. It would have been beneficial to have included further commentary on the elements chosen from each Issues and Option which has made up the Preferred Option. The amalgamation of the options to a new Preferred Option is acceptable.

CPRE – Fylde District referred to the fact that none of the Options from the Issues and Options paper have been taken forward, which undermines the previous consultation and suggest none of the options were sound. There was clear indications from the respondents that large strategic housing allocations should be directed to the Fylde-Blackpool Periphery and land near M55 junction 4, in addition to Pontins site and Queensway.

Council response

Policy wording
The Council agrees to include ‘contribute towards growth’ in the 1st paragraph of policy SD1.

Rural and Small Villages
The Council considers it necessary to replace the term “Rural Villages” with “Larger Villages” as both large and small villages are located in 'rural' locations and the term “larger villages” denotes clearly the size and scale of a defined settlement.

The Issues and Options paper included an appendix (Appendix 1) which looked at settlement hierarchy, population and accessibility score. The Council will, however, consider refining the settlement hierarchy for settlements outside the strategic locations as it develops the next version of the Local Plan based upon the settlement’s sustainability.

The Council is fully aware of paragraph 55 of the NPPF which says: “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.”
The Council agrees with the comments made by Ribby with Wrea Parish Council over the concerns raised over the settlement boundaries and Green Belt / Countryside policy being positively and vigorously defended and that the robust wording proposed in policy SD1 will be taken forward in the next version of the Local Plan and beyond to adoption.

Rural and Small villages are not included within the strategic locations for development. In regards to like-for-like replacement, the policy should have referred to small villages as described in the justification in paragraph 6.28. The two omissions will be resolved in the next version of the Local Plan.

In answer to the Home Builders Federation and residential developers concerns over a restriction on residential development in villages until the Part 2 Site Allocations, without a 5 year supply, the Council agrees to change the policy so that development outside strategic development locations will be resisted until Part 2 unless there are other material considerations e.g. 5 year supply.

The Council is committed to maintaining sustainable communities by partnership working with all appropriate agencies.

Windfall and small sites are not a rural allowance, windfalls could occur and small sites could be allocated within the strategic locations for development, this will be clarified in the next version of the Local Plan.

Heritage
The Council agrees to include reference to landscape setting in the 2nd paragraph of policy SD1.

Comments in relation to impact of development on the historic environment and opportunities to enhance, identifying inappropriate land for development, and reference to historic environment in considering the impact of strategic development locations are dealt with in chapters 7 and 14.

Flooding
The Council agrees with the Environment Agency’s recommended wording which also resolves the residential developer concerns.

The Council is aware that some of the proposed strategic sites contain land within Flood Risk Zones 2 and 3. The Council expects this part of the strategic sites to be used for appropriate forms of development, such as landscaping and sustainable drainage systems (SuDS). The next iteration of the document will make specific reference to this.

Comments in relation to no development proposed at Freckleton due to flooding but development proposed at Warton which has flooding are dealt with in chapter 13.

Infrastructure
The comments and position of the Highways Agency are noted. The Council will engage with the Highways Agency at relevant stages of the Local Plan and the preparation of the Infrastructure Delivery Plan.

Evidence
The next version of the Local Plan will reflect the latest evidence base. A revised Preferred Options document will be produced if significant amendments are made by the Council.

Housing Delivery
Comments in relation to conflicting numbers in the housing trajectory and broad distribution table; meeting housing deficit within 5 years; inclusion of 20% buffer; and justification for windfall allowance are dealt with under chapter 7.

The site delivery rates used within the Preferred Options are taken from the Strategic Housing Land Availability Assessment methodology (SHLAA). The SHLAA was produced with assistance of a steering group which included two local housing developers and a private sector planning consultancy. The
Steering Group established the delivery rate based on local knowledge of the Fylde. The Council does not have any evidence to contradict the delivery rate established.

**Housing, employment and leisure requirement**

Comments in relation to the Housing requirement are dealt with under the first part of chapter 6 above.

Comments in relation to the employment land requirement are dealt with under chapter 9.

Comments in relation to the proposed leisure allocation at Mill Farm (i.e. Site E4 – Land West of Fleetwood Road, Wesham) are dealt with under policy SL4 in chapter 7.

**Lytham and St Annes; Fylde-Blackpool Periphery; Warton; Kirkham and Wesham**

Comments in relation to Lytham and St Annes, Fylde-Blackpool Periphery, Warton and Kirkham and Wesham are dealt with in chapter 7.

The Members have agreed to rename the Blackpool Periphery Strategic Location for Development as the Fylde-Blackpool Periphery Strategic Location for Development.

**Consultation**

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors comment in relation to the plan receiving the widest support from Councillors and residents is noted.

The groupings of settlements in the Preferred Options document differs from the Issues and Options stage to reflect previous consultation comments.

The five spatial options were:

Option 1: Focus on Lytham and St Annes
Option 2: Equal focus on Lytham and St Annes and Kirkham
Option 3: Lytham and St Annes and Key and Local Service Centres
Option 4: Lytham and St Annes and Rural Dispersal
Option 5: Equal focus on Lytham and St Annes and land on the SE edge of Blackpool

It was concluded in the Consultation Statement to the Issues and Options consultation that the preferred spatial option was likely to be an amalgamation of some of the aspects of all five alternative options and a suggested sixth option. It was accepted that development should be distributed throughout the Borough, adjacent to the main settlements, in order that they could benefit from a supply of new housing and investment in the town centres, services and infrastructure. It was accepted that allowance would be made for smaller sites adjacent to lower tier settlements, small sites within strategic locations and within lower tier settlements and that these would be allocated in the Local Plan Part 2: Site Allocations to 2030. When producing the preferred spatial option the Council has to take into account the results of the Sustainability Appraisal, the responses to the Issues and Options consultation, national policy such as the NPPF and any new national and local evidence.

**Recommendations for change**

- Amend first paragraph of policy SD1 to include “… will contribute towards growth, the continuation and creation of sustainable communities …”
- Amend second paragraph of policy SD1 to include “… that is appropriate to the landscape setting, scale and character of settlements at each level of the development framework”.
- Replace the term “Rural Villages” with “Larger Villages”.

09/07/2014 Version 1.5
• Amend the sub-headings to resolve the omission of “Larger” and Small Villages being shown under the ‘Strategic Location for Development’ sub-heading in policy SD1 and re-order the paragraphs set out after the reference to “Small Villages” as the text is confusing and requires clarification.

• Amend policy SD1 to refer to ‘Like-for-like redevelopment’ in small villages and not rural villages.

• Clarify windfall and small sites definitions and that windfalls and small sites could occur / be found within the strategic locations in addition to the rural area. Allowance to be made for smaller sites adjacent to lower tier settlements, small sites within strategic locations and within lower tier settlements and that these will be allocated in the Local Plan Part 2: Site Allocations to 2030.

• Reference to be made to appropriate forms of development, such as landscaping, where a strategic site contains land within Flood Risk Zone 2 and 3.

• Amend policy SD1 to read “Inappropriate development in Flood Risk Zone 2 or 3 should be avoided”

• Amend policy SD1 so that areas outside strategic development locations will be resisted until local plan part 2, unless other material considerations e.g. 5 year supply.

• Add a criterion to policy SD1 referring to airport safety, hazardous areas and pipelines.
Chapter 7: Strategic Locations for Development

Chapter 7 General Comments:

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Representations received from:

- Environment Agency
- English Heritage
- Lancashire County Council
- Lancashire Wildlife Trust
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Councillor Hardy
- Councillor Nutty
- Greenhalgh with Thistleton Parish Council
- Newton with Clifton Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- 174 Residents
- 1 Action Group
- 8 Residential Developers

What you said

Further suggested sites
A developer suggested two sites at Clifton for residential development.

Nature Conservation / Biodiversity Designations
The Lancashire Wildlife Trust claimed that a number of the strategic locations adjoin Biological Heritage Sites or contain ponds of biodiversity - protection and enhancement will be key issues if these sites are brought forward for development. Site H5 is also adjacent to a Site of Special Scientific Interest and a Local Nature Reserve.

Previously Developed Land (Brownfield)
A resident suggested brownfield (previously developed land) or surplus employment land should be used for development. Another resident suggested the Strategic Housing Land Availability Assessment (SHLAA) was unsound as it failed to recognise the significant amount of ex-employment brownfield land becoming available.

School provision
Lancashire County Council suggested, based on the level of growth identified, the strategic sites could bring forward the need for five and a half additional primary forms of entry and approximately 600 secondary school places over the three phases. There may be a potential requirement for additional primary sites and an additional secondary school site depending on position and feasibility of expansion of existing schools at the time of delivery of these developments. The inclusion of an additional secondary

¹¹ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
school in the plan is therefore welcomed, the need is based on the cumulative impact of the growth rather than impact on one settlement.

Employment Allocations over the plan period
Treales, Roseacre and Wharles Parish Council commented on the inconsistent reference in the Strategic Locations for Development policy tables regarding ‘employment over plan period’, e.g. there is no employment provision in policy SL1 and policy SL3, and no reference for site H5 on the table in policy SL2 and sites H7 and H13 on the table in policy SL4.

Housing need – affordable and market housing
Cllr Nulty suggested that there is little need for affordable/social housing in Kirkham and Wesham, and that the policy should be amended so that such housing is only provided where there is the need. A resident suggested that existing new development is struggling to sell which demonstrates that there is no need and that further housing will affect existing property values.

Site selection
A residential developer questioned the methodology/site selection process which should be re-assessed. They also suggested there should be an assessment of allocations within larger rural areas.

Deliverability
Residential developers questioned the deliverability of the strategic sites as some are dependent on major infrastructure provision. Some residential developers were concerned over the limited number of strategic locations and sites, making the strategy highly uncertain in relation to the non-delivery of one or more sites. They suggested the strategy is heavily reliant on some sites being delivered in the first 6 years and the capacity of the housing market to absorb the level of growth at Warton was questioned.

Some residential developers suggested the Plan does not contain a contingency or policy mechanism if a strategic site fails to come forward, or delivers fewer houses than estimated.

A residential developer objected to the distribution of housing, suggesting it did not comply with the objective of ensuring that new homes are located in the most sustainable location(s). A higher number of houses should be identified at Kirkham and Wesham as opposed to Warton.

Site phasing
A residential developer supported the Council identifying constraints in chapter 7 which would affect the delivery of each strategic site. However, they objected to the constraints being used as a reason for applying a phasing approach. The residential developer claimed that the NPPF does not support a phasing approach and phasing could restrict supply.

Housing requirement
Greenhalgh with Thistleton Parish Council and many residents suggested that the housing requirement is flawed. They suggested the housing backlog should not be included in the requirement, the full potential of Whyndyke Farm will be met by 2030 and usual levels of windfalls and small sites met.

Build-out rates
CPRE Fylde District commented that the build-out rates appear to be taken from the SHLAA, which was established from the advice of house builders in 2009 during the market downturn. CPRE – Fylde District suggested build-out rates evidence should be provided and this should reflect anticipated market conditions over the whole Plan Period.

The Minority Group Report argued that planning permissions granted constitute a 5 year supply, the current 5 year supply has an over reliance on “build-out” rate and encouraged banking or permissions. Residents also agreed with the Minority Group Report in this aspect.
Cllr Nulty suggested the housing requirement is flawed and believed there are sufficient planning permissions in the pipeline to satisfy the 5 year supply. There was support for Whyndyke Farm and Whitehills.

A resident and Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested death rates exceed birth rates in Fylde, therefore we need fewer houses not more. It was also suggested the fragmentation of households is not as great as shown.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors referred to vacant dwellings and the number of dwellings available for sale and rent which demonstrated there is currently sufficient supply to meet need.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors suggested the population has remained static, key employers have declined in Fylde, which makes the area far less attractive for future employers moving into the area, therefore reducing economic migration taking place.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors suggested too much housing will detract from why people move to Fylde.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors suggested the housing number(s) which the plan is based on is not accurate, transparent or objective.

Some residents suggested that they should be allowed an opinion on the amount of land being proposed to accommodate those families wishing to migrate to this area.

A resident suggested the Fordhams Report overstated and inflated real housing need.

An action group objected to the Preferred Options proposed allocations being based on the revoked Regional Strategy rather than on objectively assessed need using latest evidence. Reference was made to the Minority Group Report.

A resident asked whether existing outstanding planning permissions have been included. The number of dwellings to be completed during the plan period at Queensway and Whyndyke Farm differ from the approved application(s).

**Flooding**

A resident commented that some strategic sites are located in Flood Risk Zones 2 and 3. Sites on the mossland are affected by springs and also act as a sponge for run-off; land at Cypress Point and Queensway are unstable; excess water from Whyndyke Farm, Blackpool Road and Whitehills will enter Main Drain.

The Environment Agency also raised concerns that some sites are located in Flood Risk Zones 2 and 3 and that there is insufficient information to demonstrate that the sequential test has been satisfied, and where necessary the exception test has been satisfied. It is not clear if land within Flood Risk Zones 2 and 3 is included in the developable site area. The Agency suggested level 1 Strategic Flood Risk Assessment may need to be expanded and level 2 may be needed. They suggested parts of the sites in Flood Risk Zone 3 that are not for development could be identified in yellow on the Maps of Strategic Locations, this has been undertaken for Queensway.

**Heritage**

English Heritage suggested the strategic site justifications fail to refer to the historic environment, including designated and non-designated assets, and local character and context. Where the site is located within peat safeguarding areas, the impact on archaeology should be considered. The plan should be expanded to deal with these matters and the potential impacts upon those elements which contribute towards the significance of the heritage assets in the vicinity. If there are likely harmful impacts upon the significance of those assets, the plan should set out the measures to mitigate the impacts. Considerations should be given
to opportunities to enhance or better reveal the significance of any heritage assets. If it is not possible to reduce the harm, an assessment should be carried out against paragraph 132 or 133 of the NPPF.

*Lytham and St Annes*
A resident suggested the secondary school should be built in closer proximity to the catchment in Lytham or St Annes to avoid traffic journeys to Warton. It was also suggested that existing schools could be expanded.

Newton with Clifton Parish Council reconfirmed its preference for option 5 from the Issues and Options paper as its preferred development option, focusing development equally on Lytham St Annes and Land on the south east edge of Blackpool.

*Fylde-Blackpool Periphery*
Newton with Clifton Parish Council reconfirmed its preference for option 5 from the Issues and Options paper as its preferred development option, focusing development equally on Lytham St Annes and Land on the South East edge of Blackpool.

There was support from many residents for development at Whyndyke Farm, the lower number identified in the Local Plan compared to the pending planning application was questioned.

A residential developer suggested Whyndyke Farm is not sustainable and has little connection with towns in Fylde Borough. The submitted Transport Assessment has not considered any impact on the highways network of Fylde, and associated traffic from committed developments. The proposed figure of 200 dwellings is unrealistic and should be revised to around 500 units due to constraints of: provision of school site and playing fields, adequate buffer and ecological habitat areas, improvements that will arise from the construction of the Preston Western Distributor road and junction 2 of the M55 and reservation of land for the Blue route (the M55 to Norcross Link Road).

*Warton*
Many residents were against development at Warton due to:
- a lack of infrastructure;
- poor transport access even after the construction of a new junction 2 on the M55;
- flooding/drainage;
- destruction of village identity;
- build-out rates will not provide sufficient time for infrastructure provision;
- disproportionate development;
- increasing the number of residents will not increase service provision which is available at neighbouring service centres;
- The Enterprise Zone will not increase demand for housing.

A resident suggested Warton does have a range of community facilities appropriate to the size of the village, it also has an identifiable and readily accessible centre. In contrast, a resident suggested the existing shopping facilities are inadequate and land should be identified in the plan for new provision.

Some residents suggested additional employment land should be identified in Warton, as the land in the Enterprise Zone is for high end Advanced Engineering and Manufacturing technology.

Some residents suggested that a relief road/bypass for Warton is needed and this should be identified in the Local Plan.

Residents were concerned that developers were submitting planning applications which pre-empted the Local Plan, which would lead to build-out differing from the phasing suggested in the Preferred Options document.

Residents suggested the proposals were in conflict with the Bryning with Warton Parish Plan.
There was support from a residential developer for the inclusion of Warton as a strategic location. The housing number for land to the west of Warton should be a minimum.

Kirkham and Wesham
A resident questioned the inclusion of site H13 (Land North of Mowbreck Lane, Wesham) considering the Council has refused the planning application and a second appeal is (was) pending. The resident suggested that the loss of best and most versatile agricultural land, flooding and potential impact of shale gas exploration / extraction were reasons against Mowbreck Lane.

A residential developer supported the inclusion of site H13, Land North of Mowbreck Lane, Wesham.

Freckleton
A resident suggested Freckleton is more suitable for significant development which would support its role as a substantial Service Centre. A Green Belt review for Freckleton was suggested.

Council response

Further Site Suggestions
Further site suggestions are listed and dealt with in appendix 2.

Environmental Designations
Comments from Lancashire Wildlife Trust are noted and the Council agrees to strengthen the wording of the policies and supporting text in chapter 14 regarding the protection and enhancement of the ecological network and the hierarchy of nature conservation sites.

Previously Developed Land (Brownfield)
Comments regarding the re-use of surplus employment land for residential development and claims that the SHLAA was unsound and did not look at surplus employment land are unfounded as the SHLAA includes a section on ‘Potential development on Redundant Employment Sites’.

Comments in relation to brownfield (previously developed land) versus greenfield sites are dealt with in chapter 6.

School provision
Comments from Lancashire County Council regarding primary and secondary school provision are noted. The Council has set up the Fylde Education Liaison Group and is working closely with staff at the Local Education Authority at County Hall, who are evaluating the possible need for an additional secondary school in Fylde, together with potential extensions to the existing primary schools.

Infrastructure
The Council is also liaising with the Public Health, Social Services and Highways Services at County Hall to calculate the level of provision of new doctors’ surgeries, dental practices, social service offices and highway improvements required to accommodate all of the growth planned for Fylde over the lifetime of the Local Plan to 2030. The level of infrastructure provision required to deliver the Local Plan will be set out in the updated Infrastructure Delivery Plan.

Employment Allocations
The Preferred Options document did not propose employment or mixed use development at Lytham and St Annes Strategic Location for Development (policy SL1) or at Warton Strategic Location for Development (policy SL3). No employment or mixed use development was proposed at the former Pontins Holiday Centre (site H5) in policy SL2, Land North of Mowbreck Lane (site H13) and Land North of Dowbridge (site H7) in policy SL4. The Council will make the tables in policies SL1 to SL4 (inclusive) clearer so as to resolve any confusion.
Housing need – affordable and market housing
Comments in relation to the need for affordable and market housing are dealt with in chapter 10.

Site selection
Appendix 2 of the Local Plan provides a strategic site assessment of sites considered. The Council will develop a background paper which sets out more clearly the process of site assessment.

The Council will set out the location of smaller site allocations in the Part 2 of the Local Plan, which will include assessments of sites within the rural areas.

Deliverability
The Council is confident that the Local Plan (Part 1) is robust and that the allocated strategic locations for development are deliverable. Therefore, the Local Plan should accord with the test of soundness in terms of deliverability. Consequently, the Council does not propose a Plan B approach. The Publication version of the Local Plan will be prepared for comments on the soundness of the plan, prior to submission to the Secretary of State for an Examination in Public.

The NPPF encourages Local Authorities to boost significantly the supply of housing. The majority of sites phased for commencement within the first 6 years have an approved planning permission.

Market saturation
In response to a resident’s suggestion that existing new development is struggling to sell, which demonstrates that there is no need for further housing, the Council considers that there is no evidence that existing new development is struggling to sell. When this is the case developers do not build. A small number of proposed developments in St Annes did stall at the beginning of the recession, they have now been completed. New developments in Warton are being completed and are selling well. The NPPF contains twelve core planning principles the third one states that the planning system should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. That is the Local Planning Authority cannot use the recession as a reason for not meeting its objectively assessed needs for development.

Site phasing
While the NPPF is silent on site phasing, it does not say that phasing should not occur and the Council has included a site phasing approach. The Council will be reviewing the policy wording regarding site phasing and it will consider the comments in relation to infrastructure constraint as a reason for applying a phasing approach.

Housing requirement
Comments in relation to the housing requirement are all dealt with in chapter 6.

Five Year supply
In response to Cllr Nulty’s suggestion that the housing requirement is flawed and there are sufficient planning permissions in the pipeline to satisfy the 5 year supply, the Council has a new SHMA which will be used to derive a new Local Housing Requirement figure. See Response to Housing Requirement in chapter 6. The Council has produced an updated Five Year Housing Requirement Paper which is on the Council’s website. It has a base date of 31st December 2013 and shows that the Council does not have a five year supply.

The Strategic Locations policy tables set out the projected housing completions during the plan period. Larger sites such as Queensway are not expected to fully deliver and be completed within the plan period, with completions expected beyond 2030, due to build-out rates and site phasing.

A background paper in support of the housing trajectory will provide evidence on the build-out rates and windfall allowance included in the calculations.
Flooding
For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of development, such as landscaping and infrastructure. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the four Maps showing the Strategic Locations for Development. For strategic location sites with approved planning permissions, the number of dwellings specified in the application has been used as the site’s capacity. In the next version of the Local Plan, the Council will apply the density on parts of a site with planning permission to the whole site.

Comments in relation to surface water flooding are dealt with in chapter 13.

Heritage
The Council will develop a background paper which sets out more clearly the process of site assessment, including an evaluation of the impact on the historic environment and potential mitigation.

Lytham and St Annes
The Council is working alongside Lancashire County Council and other providers, in developing an Infrastructure Delivery Plan which sets out the transport, social and green infrastructure provisions required to accommodate all of the growth proposed in the Local Plan. A requirement for a secondary school and its location are currently being explored with the Local Education Authority at County Hall, through the Fylde Education Liaison Group meetings.

Fylde-Blackpool Periphery
The Council notes the comments submitted from Newton with Clifton Parish Council and support from residents for development at Whyndyke Farm.

Comments regarding the sustainability of Whyndyke Farm as a strategic location for development are noted as they endorse the Council’s Preferred Options.

Warton
Comments in relation to Warton are dealt with under policy SL3 below.

Kirkham and Wesham
Comments in relation to Kirkham and Wesham are dealt with under policy SL4 below.

Freckleton
The Council has confirmed that there is no requirement for a fundamental review of the current Green Belt boundaries in Fylde for the duration of the Local Plan. Freckleton is constrained by the Green Belt to the north, an area of high flood risk to the east and Warton aerodrome to the south. Freckleton is therefore unable to take further development above infill.

Recommendations for change
- Standardise the Strategic Location tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.
- Expand the justification section to explain why Queensway is identified for lower numbers of dwellings in the plan period than the current planning permission. Queensway is not expected to fully deliver and be completed within the plan period, with completion expected beyond 2030, due to build-out rates and site phasing.
- Set out in the justification section that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be
used for appropriate forms of land uses, such as landscaping, infrastructure and Sustainable Drainage Systems (SuDS).

- Identify non developable land, which is in Flood Risk Zone 2 and 3, within the Strategic Location sites on the ‘Maps of the Strategic Locations for Development’ which accompany policies SL1 to SL4 (inclusive).

- Prepare a background paper, which will include strategic site’ assessments and constitute a portfolio of sites.

Policy SL1: Lytham and St Annes Strategic Location for Development

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Representations received from:
- Lancashire County Council
- Blackpool Council
- Treales, Roseacre and Wharles Parish Council
- Campaign to Protect Rural England (CPRE) – Fylde District
- Councillor Eastham
- AXA Insurance
- Lytham St Annes Cycle Group
- 3 Residents
- 1 Action Group
- 1 Retail Developer
- 1 Residential Developer
- 1 Mixed use Developer

What you said

*Further site suggestions*
AXA Insurance agreed that the existing urban area is not able to supply enough sites to satisfy the development needs of Fylde. AXA Insurance is willing to bring forward land in its ownership on the edge of the urban area to deliver more housing.

A residential developer suggested Blackpool Football Club Training Ground should be considered.

A mixed use developer suggested a site at Leach Lane, St Annes. The need to allocate additional housing sites in sustainable locations would justify the removal of the site from the Green Belt.

\(^{12}\) Some respondents have submitted more than one representation for this section, therefore the number of representations does not match the number of respondents.
**Affordable Housing**
Treales, Roseacre and Wharles Parish Council and CPRE - Fylde District suggested the provision of affordable housing should meet the need in the locality of the development and not the need of the entire borough.

**Infrastructure**
There was support from Lytham St Annes Cycle Group for the notion of an improved cycle access between Lytham St Annes and Blackpool. They suggested further cycle routes be provided from the end of the Queensway cycle path long the adopted road which runs between the airport and the cricket ground (and then runs behind the playing fields towards the Squires Gate industrial estate.) This route is on the boundary between Fylde and Blackpool for this reason a joint approach between both local authorities would be required. This would provide an alternative commuting option into the industrial estate from the direction of Lytham St Annes.

Cllr Eastham questioned whether all proposed road schemes should be shown in the Local Plan (Part 1).

**Flooding**
Lancashire County Council, as a lead local flood authority, commented that several strategic allocations are located within Flood Risk Zone 2 or 3. It is recognised that the Queensway site (site H1) already has approval. However, there is no explanation within the text as to whether the remaining sites meet the sequential and exception tests as outlined in the NPPF Technical guidance. Lancashire County Council claimed its support for strategic sites H1, H7, H2 and H3 is dependent upon the sites meeting the sequential and exception tests. Furthermore, the allocations appear to contradict policy SD1 which prohibits development within Flood Risk Zones 2 or 3.

An action group suggested Lytham and St Annes is at or near capacity in terms of sewerage and surface water management, this is a threat to the Ribble and Alt Estuary (Special Protection Area, Special Area of Conservation and a Ramsar site) and it is not reflected in the scoping report.

Some residents suggested that flooding is an issue in Lytham and St Annes and current drainage schemes do not work efficiently, this plan would exacerbate the problem.

**Mixed use**
Blackpool Council suggested there is an opportunity for one of the strategic sites to be identified for mixed use development to support future economic growth at Lytham and St Annes.

A retail developer suggested the policies do not refer to the benefits that suitable scale ancillary development on employment or housing land can achieve. Provision of non-B Class uses, such as retail within strategic locations could promote the establishment of sustainable communities. Retail uses can also provide an important buffer between residential and less sensitive land uses.

**Site H1 – Land at Queensway**
A resident suggested Queensway housing sales will suffer from close proximity to Blackpool International Airport and shale gas exploration and extraction (‘fracking’) site(s). CPRE Fylde District questioned the inability to complete on Queensway and Whyndyke Farm by 2030. The applicant and Inspector at the appeal inquiry for Queensway placed priority on delivery. The Planning consultant for Whyndyke Farm stated 1,500 homes can be delivered by 2030. The Local Plan is potentially over estimating the number of sites needed. Where a housing scheme has been defined by a consultant or developer, their own homes delivery evidence should supersede Planning Policy Team estimates.

**Site H2 – Land West of North Houses Lane**
A residential developer suggested site H2 lends itself to higher density development due to its relationship with the built up area and the Queensway scheme. The developer objected to the timescale given for the delivery and believed it could be brought forward sooner in the Plan period.
An action group suggested that there is no certainty that sites H2 and H3 could be delivered in the plan period as the timeline for completion of the Moss Road (the M55 to Heyhouses Link Road), which is dependent on the Queensway scheme is questionable. The scoping report was also suggested to have failed to identify Lytham Moss as functionally linked to Ribble and Alt Estuary. The action group suggested the ‘in-combination effects’ of both the proposals in the Local Plan, shale gas exploration and extraction (‘fracking’) on the Moss, drainage issues and the current Queensway scheme are all considered.

Site H3 – Land North of Moss Hall Lane
Cllr Eastham suggested site H3 is actually located in Lytham and not St Annes.

A resident suggested the site is unsuitable for housing, it is a haven for wildlife and wildflowers and would exacerbate flooding in surrounding areas. The bridge path which runs along the site is well used and should not be disturbed. There is no current housing demand in the area.

A residential developer suggested site H3 may be more suitable as lower density executive housing to provide a softer edge to the urban boundary. The developer objected to the timescale given for the delivery and believed it could be brought forward sooner in the Plan period.

An action group suggested that there is no certainty that sites H2 and H3 can be delivered in the plan period as the timeline for completion of the Moss Road (the M55 to Heyhouses Link Road), which is dependent on the Queensway scheme is questionable. The scoping report was also suggested to have failed to identify Lytham Moss as functionally linked to the Ribble and Alt Estuary. They suggest the ‘in-combination effects’ of both the proposals in the Local Plan, shale gas exploration and extraction (‘fracking’) on the Moss, drainage issues and the current Queensway scheme are considered.

Site H4 – Former EDS Site, Heyhouses Lane
A mixed use developer supported the designation of the former EDS site as a strategic site which reflects the existing mixed-use commitment on approximately 75% of the site. The draft allocation is for residential development, however, the commitments is for a mixed use site. It is understood that the plan should have only identified the existing commitment, retaining the existing employment allocation. The developer wishes to promote the whole site for mixed use development, the site represents an important and rare brownfield resource, located centrally within the main urban area of the borough. The developer refers to paragraph 22 of the NPPF which avoids the long term protection of allocated employment sites. The developer referred to the market demand report and viability study submitted with the planning application which concluded redevelopment for employment is not viable.

Council response

Further Site Suggestions
Further site suggestions submitted by developers, landowners and residents are listed and dealt with in appendix 2.

Affordable Housing
Comments in relation to affordable housing are dealt with in chapter 10.

Infrastructure
The Council is developing an Infrastructure Delivery Plan which will set out all of the infrastructure (Transport, Energy, Social and Green infrastructure) which is required to deliver all of the development proposed in the Local Plan Part 1. The Infrastructure Delivery Plan will deal with matters including flooding, drainage and sewage provision, highways infrastructure, electricity supply and provision of facilities and services. The draft Infrastructure Delivery Plan will be updated and issued for consultation alongside the Publication version of the Local Plan.
Cycle infrastructure, including new cycle paths, is considered within the Infrastructure Delivery Plan. Lancashire County Council have set out a cycle link improvement into Blackpool from St Annes via Queensway, Midgeland Road and Wildings Lane as a route to support strategic sites in Lytham and St Annes.

In relation to Cllr Eastham’s comments, the Council will update the list of strategic highway improvements in Policy T1 in chapter 12, to mirror those identified in the Fylde Coast Highways and Transport Masterplan, when the masterplan is issued for consultation in Autumn 2014.

Flooding
For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of land use, such as landscaping, infrastructure and SUDS. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the four Maps showing the Strategic Locations for Development. For strategic location sites with approved planning permissions, the number of dwellings specified in the application has been used as the site’s capacity. In the next version of the Local Plan, the Council will apply the density on parts of a site with planning permission to the whole site.

Comments in relation to sewage and surface water flooding are dealt with in chapter 13.

Mixed use
Site H4, former EDS Site, Heyhouses Lane is a mixed use development which is incorrectly identified as a housing allocation in policy SL1 and on the Map of Lytham and St Annes Strategic Location on page 52 of the Preferred Options document. This inaccuracy will be corrected in the next version of the Local Plan.

The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites (policies SL1 and SL3 in chapter 7). Comments in relation to mixed use on strategic sites are dealt with under policy GD3 in chapter 8.

Site H1 – Land at Queensway
Comments that the sales forecast will be undermined by Blackpool International Airport and shale gas exploration and extraction (‘fracking’) are noted.

Site H2 – Land West of North Houses Lane
Comments made by a residential developer suggesting a lower density and phasing the residential development on the site is noted. Housing densities are dealt with in chapter 10. The Council agrees to prepare a new policy on overall provision of housing land, including the phasing of the delivery of housing sites in chapter 10 of the next version of the Local Plan.

The Council is confident that the Local Plan is deliverable and that it accords with all of the tests of soundness. The residents of Fylde will have a chance to comment on whether the Local Plan meets the tests of soundness when the Publication version is issued. The tests of soundness for the Local Plan are: positively prepared, justified, deliverable, sustainable, impartial and consistent with national planning policy.

Comments regarding the scoping report are dealt with in the Sustainability Appraisal / Strategic Environmental Assessment section of this report.

Site H3 – Land North of Moss Hall Lane
The Council will amend the reference to site H3 at the sub-heading preceding paragraph 7.23, as it is not located in St Annes but in Lytham.

Comments made by a residential developer suggesting a lower density and phasing the residential development on the site is noted. Housing densities are dealt with in chapter 10. The Council agrees to prepare a new policy on overall provision of housing land, including the phasing of the delivery of housing sites in chapter 10 of the next version of the Local Plan.
**Deliverability**

The Council is confident that the plan is robust and that the proposed strategic locations for development are deliverable. Therefore, the Local Plan should accord with the test of soundness in terms of deliverability. The Publication version of the Local Plan (Part 1) will be produced for comments on the soundness of the plan, prior to submission to the Secretary of State for an Examination in Public.

Comments regarding the scoping report are dealt with in the Sustainability Appraisal / Strategic Environmental Assessment section of this report.

The Local Plan Part 1 will set out development in the borough to the year 2030, which will meet current and future housing requirements. The Local Plan includes policies on biodiversity in chapter 14 and flooding in chapter 13. The Local Plan is written to be read as a whole and the Council agrees to add wording in chapter 1 of the next version to emphasise this.

**Site H4 – Former EDS Site, Heyhouses Lane**

Site H4, former EDS Site, Heyhouses Lane is a mixed use development which is incorrectly identified as a housing allocation in policy SL1 and on the Map of Lytham and St Annes Strategic Location on page 52 of the Preferred Options document. This inaccuracy will be corrected in the next version of the Local Plan. The Council’s intention is to protect existing identified employment allocations, which are not the subject of existing consents for alternative uses. This policy approach is set out in more detail in chapter 9 under policy EC1.

### Recommendations for change

- Amend the sub-heading immediately preceding paragraph 7.23 of the Preferred Options to refer to “North of Moss Hall Lane, Lytham (site H3)”.

- Amend site H4 (Former EDS Site, Heyhouses Lane) in policy SL1 and on the Map of Lytham and St Annes Strategic Location, to be shown as a mixed use site.

- Standardise the Strategic Location tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.

- Amend policy SL1 so that it includes a list of all of the infrastructure required to accommodate the level of growth allocated in the strategic location for development.

- Update the draft Infrastructure Delivery Plan, incorporating the list of infrastructure requirements which appears in policy SL2 and issue it for consultation alongside the Publication version of the Local Plan.

- Set out in the justification section that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate forms of land use, such as landscaping, infrastructure and SUDS.

- Identify non developable land, which is in Flood Risk Zones 2 and 3, within the Strategic Location sites on the ‘Maps of the Strategic Locations for Development’ which accompany policies SL1 to SL4 (inclusive).

- Prepare a background paper, comprising a portfolio of sites, which will include strategic site assessments.

- Add a new policy on the overall provision of housing land, including the phasing of the delivery of housing sites in chapter 10 of the next version of the Local Plan.
Policy SL2: The Fylde-Blackpool Periphery Strategic Location for Development

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Representations received from:
- Councillor Sue Ashton
- Councillor Eastham
- Councillor Hardy
- Blackpool Council
- Lancashire County Council
- Lancashire County Council – Property Services
- Elswick Parish Council
- Kirkham Town Council
- Ribby with Wrea Parish Council
- Westby with Plumptons Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- Highways Agency
- Lancashire Wildlife Trust
- Lytham St Annes Civic Society
- Lytham St Annes Cycle Group
- Centrica Plc - Heliport Terminal
- A Residents Action Group
- 169 Residents
- 3 Residential Developers/Landowners
- 1 Mixed use Developer

**What you said**

Ribby with Wrea and Elswick Parish Councils supported development at Fylde-Blackpool Periphery.

Kirkham Town Council supported development at Fylde-Blackpool Periphery, suggesting it as an alternative to development at Kirkham and Wesham to retain existing settlement identity.

There was support from the Minority Group Report for development adjacent to the Blackpool boundary at Whitehills, Cropper Road and Whyndyke Farm due to high unemployment in Blackpool and good M55 access and services.

There was support from a land owner for the identification of the Fylde-Blackpool Periphery as a future housing and employment location.

**Further site suggestions**
Further sites suggested at Blackpool Football Club Training Ground and Cropper Road West (including Cropper Garage).

\(^{13}\) Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
Cllr Sue Ashton suggested Cropper Road West and development up to Jubilee Lane, Westby as an alternative to Whyndyke Farm.

**Fylde-Blackpool Periphery name**

Westby with Plumptons Parish Council objected to the inclusion of policy SL2, suggesting they are not a suburb of Blackpool, the investment should focus on rejuvenating the existing Blackpool suburbs. The Parish Council is not against improvements to infrastructure, housing and further commercial development but it must be sympathetic.

Cllr Sue Ashton objected to the area being referred as the periphery of Blackpool and the countryside in Westby should be defended against some of the proposals in the Local Plan. A resident suggested the area should be called North West Westby with Plumptons.

**Mixed use development**

A retail developer suggested the policies do not refer to the benefits that suitable scale ancillary development on employment or housing land can achieve. Provision of non-B Class uses, such as retail within strategic locations could promote the establishment of sustainable communities. Retail can also provide an important buffer between residential and less sensitive land uses.

**Infrastructure**

The Highways Agency commented that there is the potential for significant additional demand on the M55 as a result of the scale of development proposed. The Agency welcomed the recognition in paragraph 7.34 that potential highway improvements will be considered, the Agency would wish to be involved in considering the evidence so that it can be assured that the outcomes are reasonable, feasible and deliverable.

There was support from Lytham St Annes Cycle Group for the notion of improved cycle access between Lytham St Annes and Blackpool. The Cycle Group suggested further cycle routes be provided from Squires Gate railway station along the rear of the former Pontins site (alongside the railway boundary fence) to emerge further along the A584 in the direction of St Annes. The route could continue along the railway fence in the direction of St Annes through the nature reserve to emerge into Kilgrimol Gardens.

**Flooding**

Lytham St Annes Civic Society commented that drainage is a key concern in south Fylde and proposals in Whitehill area will make this matter worse.

**Site H5 Former Pontins Holiday Centre**

Lancashire Wildlife Trust commented that the DEFRA funded Starr Hills Environmental Works Programme has agreed that it is a priority action to establish the likely migration required on the adjoining dune system (Site of Special Scientific Interest / Local Nature Reserve / Biological Heritage Site). Paragraph 118 of NPPF and possibly 119 will be relevant for site H5. Paragraph 119 of the NPPF will be relevant to proposed developments within the Coastal Parkway masterplan.

The Lancashire Wildlife Trust commented in relation to Habitat Regulations Assessments comments on policy SL2, which says policy SL2 could impact on the Ribble and Alt Estuaries Special Protection Area / Ramsar site in relation to site H5, and recommends rewording the policy to address this. The Wildlife Trust suggested that it is unclear if this has already been addressed in the policy.

**Site M1 Land East of Cropper Road**

A mixed use developer suggested site M1 should be expanded to include a wider area. It is assumed that the existing allocations for proposed and existing employment land are carried forward and this should be considered alongside this current proposed allocation to be dealt with as a whole. There is no reason why the proposed allocation has to work around existing undeveloped sites, rather than adopting a comprehensive solution with a flexible supportive framework.
The mixed use developer, suggested that the mix of uses supported within the strategic site area should also be broadened. This would include a mix of residential uses and traditional employment uses (Class B1, B2 and B8 uses) alongside other employment-generating commercial uses, including retail, hotel, non-residential institutions, assembly and leisure and sui generis commercial uses.

Lancashire County Council Property Group supported the identification of site M1 for mixed use and expect to see flexibility in terms of access, number of dwellings and the type and amount of employment land to ensure the future development is achievable and deliverable.

There was support from residents for identifying residential development in preference to the spread of commercial units at and/around Whitehill Road.

*Site M2 Whyndyke Farm*

Elswick and Treales, Roseacre and Wharles Parish Councils supported the inclusion of Whyndyke Farm.

Cllr Sue Ashton objected to paragraph 7.40 describing the site currently as mixed use, and highlighting that the description does not refer to the farm and agricultural use. Cllr Sue Ashton suggested the ponds should be used for a nature reserve and the site could be used for tourism. The area has surface and sewer flooding which impacts on the Ribble Estuary. Highway congestion will be caused. The site includes peat which should be retained as a carbon sink. A resident also mentioned flood risk.

CPRE - Fylde District supported the inclusion of Whyndyke Farm. CPRE – Fylde District is aware that some greenfield sites are needed and believe that Whyndyke Farm should be given priority to make a major contribution to housing requirement.

Blackpool Council suggested reference be made in the justification to the sub-regional significance of Whyndyke Farm.

In relation to Whyndyke Farm, an action group suggested that it is environmentally beneficial not to interfere with peat areas which act as a carbon sink. The action group also referred to serious water issues which will need to be resolved before the area is developed.

Lancashire County Council commented that peat safeguarding areas have been amended, Fylde should therefore refer to NPPF for guidance on peat safeguarding rather than the Lancashire Minerals and Waste Local Plan.

Councillor Eastham suggested paragraph 7.31 should be amended to read “further infrastructure for water supply is required”.

A resident referred to issues relating to flood risk and surface water drainage, biological heritage site(s), field ponds and peat safeguarding area(s).

An action group raised issues over wastewater capacity which would have to be resolved to make this development viable. The action group went on to disagree with the statement that the landscape is currently poor and redevelopment may be beneficial. They claimed that this was an inaccurate description of Whyndyke Farm which they consider has a beautiful mix of cultivated fields and grazing and fallow land. They claimed that the loss of the land to mixed use development would be visually over-bearing. The site could encourage creeping development, potentially linking the area to Lytham St Annes. Existing residents would be disturbed during construction. The local road network would be overloaded, Mythop Road is not designed for more vehicles and there would be a potential impact from air pollution.

A residential developer supported the inclusion of Whyndyke Farm for mixed use. It was suggested if the scheme is approved shortly, construction could start much earlier than the estimated year of 2020, and could deliver closer to 1000 dwellings in total.
The Minority Group Report commented that after discussions with the landowner of site M2, the site could deliver 100 houses a year and up to 1,500 within the plan period. The scheme would also deliver infrastructure, services and facilities on site, be sustainable and assist with the “Duty to Co-operate”.

A resident suggested Whyndyke Farm is East of A583 and not West as referred to in paragraph 7.40. The A583 provides a clear boundary between urban sprawl of Blackpool and Fylde’s countryside.

Many residents and the Minority Group Report supported site M2 and suggested that this should replace sites identified under policy SL4 (Kirkham and Wesham Strategic Location for Development). It was also suggested that site M2 could fully deliver and be completed within the plan period and could meet the housing and employment needs of Blackpool.

**Site E2 Land at Blackpool International Airport**

Lancashire County Council commented that policies SL2 and EC1 identify 5ha of employment land at Blackpool International Airport for B1a uses. Identification of land for development at the airport to achieve value is supported, however further consideration should be given to a broader mix of uses as enabling development.

Blackpool International Airport noted the emerging Local Plan includes policies SL2 and EC1, which identify 5ha of land (site E2) as a strategic location for development. Blackpool International Airport are seeking a policy framework which:

- Establishes the Council’s ongoing commitment to support the continued operation and viability of the Airport as an important regional facility;
- Identifies the Airport as an area of change; and
- Provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting the Airport).

Heliport Terminal objected to the proposed allocation, in particular the inclusion of the Heliport within this allocation. Heliport also requested that further development at or around the Airport does not restrict its operations, including interference with communication, navigation or radar equipment.

Lytham St Annes Civic Society commented that drainage is a key concern in south Fylde and proposals in the Whitehills area will make this matter worse.

**Council response**

Comments from the Parish and Town Councils, the Minority Group Report and from a landowner for the identification of the Fylde-Blackpool Periphery as a future housing and employment location are noted.

**Further Site Suggestions**

Further site suggestions are listed and dealt with in appendix 2.

**Fylde-Blackpool Periphery name**

Comments regarding the name of Fylde-Blackpool Periphery are covered in chapter 2: Spatial Portrait of Fylde.

The Council notes the comments of the Westby with Plumptons Parish Council and Cllr Sue Ashton regarding Fylde-Blackpool Periphery.
Mixed use development
The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites. Comments in relation to mixed use development on strategic sites are dealt with under policy GD3 in chapter 8.

Infrastructure
The comments and position of the Highways Agency are noted. The Council will engage with the Highways Agency at relevant stages of the preparation of Part 1 of the Local Plan and the Infrastructure Delivery Plan.

The Council is developing an Infrastructure Delivery Plan, which will set out all of the infrastructure (Transport, Energy, Social and Green infrastructure) which is required to deliver all of the growth proposed in the Local Plan Part 1. The Infrastructure Delivery Plan will deal with matters including flooding, drainage and sewage provision, highways infrastructure, electricity supply and provision of facilities and services. Cycle infrastructure, including new cycle paths, is considered within the Infrastructure Delivery Plan. The draft Infrastructure Delivery Plan will be updated and issued for consultation alongside the Publication version of the Local Plan.

Flooding
For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of land use, such as landscaping, infrastructure and SUDS. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the four Maps showing the Strategic Locations for Development. For strategic location sites with approved planning permissions, the number of dwellings specified in the application has been used as the site’s capacity. In the next version of the Local Plan, the Council will apply the density on parts of a site with planning permission to the whole of the site.

Comments in relation to sewage and surface water flooding are dealt with in chapter 13.

Site H5 Former Pontins Holiday Centre
Comments in relation to Starr Hills Environmental Works Programme are noted. Comments regarding the Habitat Regulations Assessment are dealt with in the Sustainability Appraisal / Habitats Regulation Assessment scoping section.

M1 Land East of Cropper Road
Proposals for further site suggestions / expansion of proposed strategic locations are included in appendix 2.
The Council will prepare a Policies Map which will include all of the existing employment allocations to be taken forward in the emerging Local Plan, together with new employment allocations under EC1 policy. This will assist the Council in progressing a comprehensive approach to the Whitehills Area.

The Council notes the position of Lancashire County Council Property Group regarding their land ownership.

The Council notes the residents support for residential development in preference to commercial units at / and around Whitehill Road.

The Council considers that the mix of uses within the strategic site area, on Land East of Cropper Road, should not be broadened.

Site M2 Whyndyke Farm
The Council notes the position of the resident and the Parish and Town Councils and the Minority Group Report.
Comments in relation to peat safeguarding areas and peat acting as a carbon sink are dealt with in chapter 1.

Comments in relation to flood risk and surface water drainage are dealt with in chapter 13.

Comments in relation to landscape quality are dealt with in the Sustainability Appraisal section and in policy ENV1: Landscape in chapter 14. The Council considers that there is a need to carry out landscape assessment work on the strategic locations for development across the Borough, so as to strengthen policy ENV1 and to enhance the evidence base to the Local Plan (Part 1). The Council agrees to refer to the sub-regional significance of Whyndyke Farm as a strategic site in the justification to policy SL2.

The Council agrees to amend the wording of paragraph 7.31 regarding the water supply to Whyndyke Farm.

The Council will amend the inaccuracy in paragraph 7.40 so that it refers correctly to Whyndyke Farm being situated to the east of Preston New Road (A583).

The Council will also refer to the existing agricultural use of Whyndyke Farm in the site description in paragraph 7.40.

The Council has resolved to reduce the number of houses developed at Warton from 1,160 to around 650 over the plan period; and to bring forward the phasing of housing development at Whyndyke Farm (Site M2) from a projected commencement date of 2020 to a start date of 2015. This will result in Whyndyke Farm being fully delivered and completed within the plan period.

The Council notes the position of the residential developer and the Minority Group Report.

The Council will work with Lancashire County Council and other infrastructure providers as part of the development of the Infrastructure Delivery Plan, to set out the level of infrastructure provision required to deliver the Local Plan. The Infrastructure Delivery Plan will include highways infrastructure and water provision, together with social infrastructure and green infrastructure.

**Site E2 Land at Blackpool International Airport**

Comments relating to site E2, specifically enabling development at Blackpool International Airport are dealt with under policy EC1 in chapter 9. Comments relating to a review of Green Belt are dealt with under chapter 5. Comments relating to the future policy framework at Blackpool International Airport are dealt with under policy T2 in chapter 12.

The Council will liaise with Blackpool International Airport regarding the proposed allocation at the Heliport Terminal.

The Council will expand policy ENV6 (which is proposed to become policy GD5 in chapter 8 in the next version of the Local Plan), to insert a criteria which prevents new development interfering with the operation of existing land uses.

Policy Cl2 in chapter 13 deals with the impact of renewable and low carbon energy generation on the operation of Blackpool International Airport.

### Recommendations for change

- The boundaries of all existing employment allocations to be taken forward with new allocations identified in policy EC1 in chapter 9 will be shown on the new Policies Map, which will be prepared to accompany the Publication version of the Local Plan.
• Amend policy SL2 so that it includes a list of all of the infrastructure required to accommodate the level of growth allocated in the strategic location for development.

• Update the draft Infrastructure Delivery Plan, incorporating the list of infrastructure requirements which appears in policy SL2 and issue it for consultation alongside the Publication version of the Local Plan.

• Expand policy ENV6 of the Preferred Options document, (which is to become policy GD5 in the next version of the Local Plan), to include a criterion which prevents new development impacting on the operation of existing land uses.

• Amend policy SL2 so that the projected commencement date for site M2 – Whyndyke Farm is “2015” and not “2020”.

• Refer to the sub-regional significance of Whyndyke Farm as a strategic site in the justification section to policy SL2.

• Amend paragraph 7.31 of the Preferred Options to read: “Further infrastructure for water supply is required …”

• Amend paragraph 7.40 of the Preferred Options to read: “This mixed use site is situated to the east of Preston New Road (A583)…..”

• Amend paragraph 7.40 of the Preferred Options to read: “… Preston New Road, Peel and is predominantly in agricultural use but also includes a petrol station and static caravan park …”

• Standardise the Strategic Location tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.

• Set out in the justification section that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate forms of development, such as landscaping and infrastructure.

• Identify non developable land, which is in Flood Risk Zone 2 and 3, within the Strategic Location sites on the ‘Maps of the Strategic Locations for Development’ which accompany policies SL1 to SL4 (inclusive).

• Prepare a background paper comprising a portfolio of sites, which will include strategic site’ assessments.

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### Policy SL3: Warton Strategic Location for Development

<table>
<thead>
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<th>Number of representations:</th>
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<td><strong>Comment</strong></td>
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09/07/2014 Version 1.5
Representations received from:
- Councillor Sue Ashton
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Bryning with Warton Parish Council
- Treales, Roseacre and Wharles Parish Council
- Blackpool Council
- Lancashire County Council
- Lancashire Enterprise Partnership
- Highways Agency
- Sport England
- BAE Systems Real Estate Solutions
- Blackpool, Fylde and Wyre Trades Union Council
- Lytham St. Annes Civic Society
- Lytham St Annes Cycle Group
- The Minority Group Report
- Carr Hill High School
- The Boys’ Brigade
- 133 Residents
- 7 Residential Developers / Landowners
- A Retail Developer

What you said

Further site suggestions
A residential developer suggested the inclusion of a site adjacent to Church Road and an amendment of the Green Belt boundary at this location which would provide a logical extension to the urban area and a realistic, sensible and long-term Green Belt boundary.

Some residents suggested some of the development should occur at Freckleton, some suggested the area to the north of the bypass as an alternative.

A landowner suggested Great Birchwood Country Park as an alternative secondary school location on a previously developed land (brownfield) site. The response referred to paragraph 69 of the NPPF which suggests appropriate previously developed land (brownfield) development in the Green Belt can be appropriate.

Mixed use development
Blackpool Council suggested there is potential for one of the sites to be used for mixed use development to support future economic growth.

BAE Systems Real Estate Solutions suggested Warton Aerodrome and the Enterprise Zone provide opportunities to build and diversify the local economy. There may be land within the aerodrome which could provide opportunities for retail and community facilities in Warton. There could be opportunities to utilise brownfield land and existing infrastructure on site as part of mixed use redevelopment.

A resident commented that the justifications for inclusion of the sites were generic and could apply to any location, this does not justify inclusion of new homes in Warton.

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14 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
Residential developers supported the inclusion of Warton as a strategic location. Reference was made to the proposed new junction 2 of the M55 supporting economic growth at Warton.

A retail developer suggested the policies do not refer to the benefits that suitable scale ancillary development on employment or housing land can achieve. Provision of non-B Class uses, such as retail within strategic locations could promote the establishment of sustainable communities. Retail can also provide an important buffer between residential and less sensitive land uses.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors objected to the increase in the size / scale of Warton which would have a negative effect on character.

The Minority Group Report objected to the scale of development proposed at Warton and the increase of more than 75%. They suggest the justification is weak and hangs on inaccurate employment land need; expansion at Lancashire Enterprise Zone (Warton) for high technology industries typically produce low volume employment opportunities; and elevated status from a local to key service centre. The Minority Group Report suggest the development at Warton would conflict with Objective 2 "retaining the identity, character and setting of the rural villages."

Cllr Sue Ashton commented on the highways infrastructure and the lack of a proposal for a new road, commenting that the recent Nine Acre nursery development had impacted on the highway. Cllr Sue Ashton also agreed that new facilities should be provided but did not see how a new centre could be created as the village is ribbon development with a busy road. Cllr Sue Ashton suggested the proposed level of housing is too high.

Many residents objected to the inclusion of sites at Warton for the following reasons:

- loss of agricultural land;
- flooding;
- noise;
- no need for secondary school;
- there is a lack of community facilities in Warton;
- change character forever;
- provision; no demand for housing;
- impact on existing house prices;
- loss of wildlife and habitat;
- primary schools fully subscribed;
- retain existing boundary;
- highways safety;
- traffic congestion
- anti-social behaviour created from higher density development;
- the proposal goes against the recent village plan.
- No longer a village.
- High density / over development
- Visual impact / overlooking / loss of privacy / over shadowing
- Limited public transport
- Change from a village to a town
- Cannot justify development in Warton because there is strong developer interest.

A resident supported the inclusion of Warton for development, they suggested residential development should include:

- an industrial area for small local business;
- Cycle ways
- Allotments
- Play areas for children
- Landscaping
- Highways enhancement: one way system around Queensway off Harbour Lane and widen Hillock Lane
- A high school located between Warton and Freckleton with community use.
- Rationalise the under-use of Bridges Playing Fields
- More development would enhance the attractiveness commercially for a supermarket
- Housing for older population

A residential developer objected to the level of development proposed at Warton, suggesting a greater proportion of development should be attributed to Kirkham and Wesham.

**Infrastructure**

Lancashire County Council commented that there was a need for a significant increase in the levels of infrastructure and service provision. New road infrastructure to the north may be required from developer funding. A Single Local Growth Fund may be required as the scale of development proposed is unlikely to be sufficient to raise sufficient funds.

Treales, Roseacre and Wharles Parish Council commented that infrastructure improvements needed at Warton may put the Warton Enterprise Zone at a disadvantage compared to Samlesbury. The Parish Council commented that Warton would appear to benefit from a bypass, the route should be explored and protected.

Many residents objected to the expansion of Warton due to infrastructure provision, siting highway congestion and the lack of sewerage provision.

Some residents suggested that the proposed new junction 2 of the M55 would increase traffic movements in Warton.

Lytham St Annes Cycle Group supported a coastal cycle route, with a shared cycle / pedestrian route around the former Land Registry to connect with the A584 via Lytham Quays. This new route would be supported by a new Secondary School in Warton, the Enterprise Zone and would be consistent with the Green Infrastructure Strategy.

A resident commented on road infrastructure and BAE Systems, Warton traffic, suggesting that the new entrance to BAE Systems, Warton and the Enterprise Zone, through the GEC Marconi site, would not alleviate traffic congestion but would create a key congestion area rather than the current layout which diverts traffic via 3 exits.

Lytham St Annes Civic Society commented that no new road infrastructure is proposed in Warton in an area which is already congested during peak times due to the location of BAE Systems, Warton. Warton is also a key route into Lytham from Preston.

Cllr Eastham commented that Warton bypass is needed for the plan to proceed in its current form; and that paragraph 7.73 should be reworded to refer more clearly to infrastructure that will be required. Residents commented that a new bypass is needed, some suggested this should be constructed before further development takes place.

Some residents objected to development at Warton, suggesting it did not follow the aims of policy INF1 to make the most of existing infrastructure, focusing development to sustainable locations with the best infrastructure capacity. Residents claimed that development at Warton contradicted Strategic Objective 1 (To Create Sustainable Communities) in chapter 4, which aims to locate development in sustainable locations so as to minimise private transport and avoid areas at risk of flooding.

The Highways Agency commented that Warton is located a relative distance from the strategic road network, in relation to the potential connectivity to other areas in the Fylde peninsula. There are potential implications on the strategic road network which would need to be fully understood.
The Highways Agency claimed that the overall development of 1,160 dwellings will have an impact on the strategic road network, particularly when combined with the Plan’s other development. It is important for the Agency that the impacts are fully understand and supported by necessary transport infrastructure.

The Agency wishes to be fully involved at the earliest opportunity to ensure appropriate consideration is given to the potential impact of the proposed new Preston Western Distributor road and junction 2 on the M55.

A residential developer suggested that the Infrastructure Delivery Plan does not link new residential development with the need for a new M55 Preston Western Distributor link road. The developer claimed that the only reason stated for the link road is to improve access to the Enterprise Zone in Warton. Accordingly, there is no evidence within the Infrastructure Delivery Plan of congestion in Warton which will be alleviated by the new junction to the M55. There is no evidence to indicate a site phasing on highways infrastructure in Warton is needed. The developer claims that work is needed to be undertaken in terms of the impact of junction 2 of the M55 and the requirement for a bypass at Warton before the level of development is restricted.

A resident raised concerns over highways infrastructure, claiming that the proposed Preston Western Distributor Road is irrelevant, traffic impact is connected to the entrance to the employment site causing problems. An increase in resident numbers would exacerbate this and present a potential accident risk.

Secondary school
Bryning with Warton Parish Council suggested the grounds and evidence to support the need for a Secondary School within the Parish was not justified or likely to be required in the future, well beyond 2030. There is a potential future demand in Lytham and St Annes and the Plan should identify a suitable site within these settlements. The Parish claimed that the school location in Warton would be beyond a walking or cycle distance, creating extra vehicular traffic and peak hour congestion.

Cllr Sue Ashton supported the need for a new school, but suggested this should be located on site H10 (Land east of Warton) to serve Warton and Freckleton residents who may walk and cycle, reducing the number of car journeys. Lytham St Annes High School has already been extended to the limits and is in danger of losing its character. The new school could be used for community facilities and learning.

The need for a secondary school was questioned by residents, some residents suggested it should be provided closer to its main catchment of Lytham and St Annes. Residents were also concerned how a school in this location would impact on highways safety and traffic congestion.

Blackpool, Fylde and Wyre Trade Unions Council commented that care is needed to ensure that any new school is constructed and opens in time to match population growth. The Trade Unions Council claims that any new school should be under democratic control and not be an academy or free school.

Carr Hill High School commented that there is no need for a secondary school and provision of a new school would impact on existing schools. Carr Hill faces financial difficulties as a result of prolonged decline in the number of 11 year olds which would be resolved if children from Warton development are directed to Carr Hill. Capital investment in a new school would be better invested in existing school facilities and infrastructure.

A resident supported the provision of a secondary school which could share facilities with the community.

Community Facilities
Sport England objected to the reference in paragraph 7.49 to the possibility of relocating a swimming pool for Kirkham to Warton. Sport England questioned the strategic rationale for this. Sport England has the Facilities Planning Model which could be used to scenario test the feasibility of making such a decision. As a Built Facilities Strategy should be one of the Needs Assessments that underpins policy required by paragraph 73 of the NPPF, pool scenario testing should be carried out as part of that work.
Flooding
Bryning with Warton Parish Council commented that the Local Plan identifies suitable areas for development, despite acknowledging in chapter 13 the low level coastal area is susceptible to sea level rise and increasing river and surface water flooding. The Parish Council claims that the current drainage and sewer system cannot cope with the existing settlement requirements. The proposed allocations are surrounded by tidal drainage ditches. These concerns have been raised with developers and relevant authorities but disregarded as drainage and sewerage is not taken into account for planning applications and figures suggest existing provision should cope. The Parish Council claims that the Strategic Flood Risk Assessment is inaccurate as it does not identify Warton. The Parish Council claims that flooding, wastewater and surface water run-off issues should all be resolved before further development is considered or permitted in Warton.

Enterprise Zone
Lancashire Enterprise Partnership suggested that the strategic importance of the Enterprise Zone at Warton needs to be positioned in the plan, this should include developing a policy for the site as a strategic location. The role of the Enterprise Zone in relation to the City Deal should be referenced, this should include placing a greater emphasis on the role of the City Deal and its potential to significantly improve the economic and physical connectivity of key employment and housing sites. This would strengthen working with other councils and linkages to the City of Preston.

Lancashire County Council supported the planned growth in Warton and its complementary role for the Enterprise Zone. Lancashire County Council suggested that the role of the Enterprise Zone in relation to the Preston and Lancashire City Deal should be referenced and emphasis placed on the role of the City Deal and its potential to significantly improve the economic and physical connectivity.

Residents suggested that there have been low levels of interest in the Enterprise Zone, which will impact on housing requirement in the area.

Some residents asked whether the Council had contacted BAE Systems Real Estate Solutions to enquire about the future potential employment situation and business take-up at the new Enterprise Zone.

Housing requirement
Treales, Roseacre and Wharles Parish Council commented that it is not clear why a large amount of additional housing is required in the area considering loss of jobs at BAE Systems, Warton and fewer local jobs. The loss of jobs at BAE Systems, Warton should be factored into the housing requirement.

Affordable housing
A resident referred to the GEC Marconi site, which provides 30% affordable housing, they questioned whether the remaining dwellings would become affordable if they are not sold.

Local centre
BAE Systems Real Estate Solutions commented that paragraph 7.49 should state that Warton will be a key service centre rather than an improved local centre.

Bryning with Warton Parish Council claimed that Warton does not have the local services, retail, and commercial or highways transport access to be a local service centre. Warton is not at an equivalent level to Freckleton or Kirkham for service provision. It will not be a key service centre on a par with Lytham and St Annes by 2030. A greater availability of facilities and open recreational green space should be available for the community to meet the vision for Fylde but these should be in keeping with the 'rural' nature of the village. Warton should not be elevated to a key service centre.

Cllr Brickles and a resident commented on the reference to Warton becoming a key service centre, which had been agreed at a Local Plan Steering Group meeting to be deleted and remain as a local service centre.
Some residents commented that Warton does not have a centre and the current village hall is inadequate in size. The residents claimed that the vague mention of community facilities is hardly likely to solve the social problems which will arise. Some residents commented that the area is not a service centre and it will not become one, they also commented that the document does not say when Warton will become a key service centre by. Residents also said the document should specify the infrastructure upgrades needed and by when they will be delivered.

Site H8 Land West of Warton
Bryning with Warton Parish Council commented that the open green space along Lytham Road, west of the settlement boundary in the area designated site H8, Riversleigh Farm should be identified and allocated for recreational open space in accordance with chapter 14. The Parish Council suggested that financial provision should be sought via CIL as an identified need.

There was support from residential developers for sites H8 and H9, who suggested the sites could accommodate additional residential development over the proposed allocation, which could meet the bulk of Warton’s needs and could be delivered earlier than the suggested phasing. They also questioned the deliverability of site H10, which is constrained by different land ownership, land in Flood Risk Zones 2 and 3, protected playing fields and land safeguarded for mineral extraction.

A residential developer suggested amendments to the references to wastewater infrastructure claiming wastewater infrastructure in the Warton Area may need to be upgraded to deliver part of this site (with regards to site H8). For all sites listed in policy SL3, it should refer to wastewater infrastructure in the Warton area may need to be upgraded in order to deliver these sites. This was based on the Flood Risk Assessment submitted with the planning application on site H8.

Some residents commented that the proposed allocation included land currently used for a range of businesses and the current proposal does not include an area to relocate new businesses.

Some residents commented on the site phasing which is phased to deliver housing later in the plan period. However, residents in the vicinity of the site claimed that they received printed proposals which were not mentioned at the public consultation event.

A resident suggested that site H8 should be built first in Warton to allow for the provision of a large public space in this area of the village.

Residents commented that the site contains tree preservation orders and wildlife (biodiversity).

A resident supported the development of this site and supported the development of a wider range of shops in Warton.

Site H9 Land North of Warton
There was support from residential developers for sites H8 and H9. The developers suggested the sites could accommodate additional residential development over the proposed allocation, which could meet the bulk of Warton’s needs and could be delivered earlier than suggested in the phasing.

Residents commented that the site contains biodiversity.

Some residents commented on the site phasing which is phased to deliver later in the plan period. However, residents in the vicinity of the sites claimed that they received printed proposals which were not mentioned at the public consultation event.

Site H10 Land East of Warton
Residential developers questioned the deliverability of site H10, which is constrained by different land ownerships, land in Flood Risk Zones 2 and 3, protected playing field and land safeguarded for mineral extraction.
Residents commented on the number of ponds on the site, which should be protected as well as it being in a Flood Risk Zone.

Many residents referred to an existing covenant on two triangular areas of land within this site which prohibit any development for 20 years.

Many residents objected to the inclusion of Bridges Playing field within this site.

Sport England objected to the loss of the playing field within site H10, unless the Playing Pitch Strategy clearly demonstrates the site is clearly surplus to requirements, i.e. it is not needed to be brought back into use to support existing demand or demand generated from the increase in housing in the area, or the policy specifies a replacement within the locality should be found.

The Boys’ Brigade raised concerns about residential development adjacent to their training site and the potential for future residents to object to their activities on site.

Site H12 Former GEC Marconi Factory Site
BAE Systems Real Estate Solutions supported the inclusion of this site and projected commencement. BAE Systems Real Estate Solutions suggested a column is inserted into the table in policy SL3 regarding a potential location for retail and community facilities. BAE Systems Real Estate Solutions claimed that it is important that these key facilities are identified in the Local Plan Part 1 in terms of a broad location.

Many residents suggested this site is sufficient to meet Warton’s needs.

Council response

Further Site Suggestions
Further sites suggested by developers, landowners and residents are dealt with in appendix 2.

Members Decision

Mixed use development
Should there be a mixed use and / or employment site at Warton, with employment which compliments the Enterprise Zone.

Members agreed at the LPSG meeting on 5th June 2014 that there should be a mixed use / employment site at Warton, which compliments the Enterprise Zone. The Council will work with the Bryning with Warton Neighbourhood Plan Steering Group to identify a suitable site.

The Minority Group Report comments in relation to BAE Enterprise Zone, which is based on high technology and typically creating low volume employment opportunities, will be potentially dealt with through a mixed use development site at Warton.

The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites (policies SL1 to SL4 inclusive in chapter 7) under policy GD3 in chapter 8.

Infrastructure
The Council is developing an Infrastructure Delivery Plan which will set out all of the infrastructure (Transport, Energy, Social and Green infrastructure) which is required to deliver all of the growth proposed in the Local Plan Part 1. The Council is liaising with the Local Education Authority, Public Health, Social
Services and Highways Services at County Hall to calculate the level of provision of new school places, doctors surgeries, dental practices, social service offices and highway improvements required to accommodate all of the growth planned for Fylde over the lifetime of the Local Plan to 2030. The level of infrastructure provision required to deliver the Local Plan will be set out in the updated Infrastructure Delivery Plan. The Infrastructure Delivery Plan will deal with matters including flooding, drainage, wastewater and sewerage provision, highways infrastructure, electricity supply and provision of facilities and services. The draft Infrastructure Delivery Plan will be updated and issued for consultation alongside the Publication version of the Local Plan.

**Community Facilities**
The Council agrees with Sport England regarding the lack of a strategic rationale for the provision of a new swimming pool in Warton to replace the existing facility in Kirkham; and that the reference should be deleted from paragraph 7.49 of the Preferred Options document.

**Flooding**
Part of site H10 (Land east of Warton) is within Flood Risk Zones 2 and 3. For sites that overlap into Flood Risk Zone 3, Government policy allows housing development if the ‘Sequential’ and ‘Exceptions’ test has been met.

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare, based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of land use, such as landscaping and infrastructure. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the four Maps showing the Strategic Locations for Development. For strategic location sites with approved planning permissions, the number of dwellings specified in the application has been used as the site’s capacity. The Council will apply the density on parts of a site which has planning permission to the whole of the site in the next version of the Local Plan.

Comments in relation to sewage and surface water flooding are dealt with in chapter 13.

**Enterprise Zone**
The Council agrees with Lancashire Enterprise Partnership’s suggestion that the strategic importance of the Enterprise Zone at BAE Systems, Warton needs to be clarified in the plan, and there will be a new policy on the Enterprise Zone as a strategic location. The new policy should be inserted in chapter 9 – The Fylde Economy.

**Secondary school**
The Council acknowledges the comments made by Bryning with Warton Parish Council, Cllr Sue Ashton, local residents and Carr Hill High School regarding a new secondary school in Warton. The process of establishing a location for a secondary school is still at an early stage. It is anticipated that a definitive decision as to whether a new secondary school will be required, along with its location within the catchment area identified by Lancashire County Council will be made before the Council issues the next version of the Local Plan (Part 1).

Potential sites for a secondary school within Lytham and St Annes were considered by Lancashire County Council, but such sites were either too small, had planning permission for other uses, or were on sites where development is close to going ahead or being approved.

Land west of Warton was suggested as a preferred location by Fylde Council as it is anticipated that the school could also serve the demand associated with the strategic housing sites proposed at Warton in the Preferred Options. It is also less likely to compete with existing secondary schools and serve the population in east Fylde.

Land at the Great Birchwood site has been considered by the Local Plan Steering Group for the development of a secondary school. However, the site is located in the Green Belt and within Flood Risk
Zone 3 (and it is not in close proximity to the housing estates in Warton, so pupils would not walk to the site).

**Housing requirement**
Comments in relation to the housing requirement are all dealt with in chapter 6.

**Housing need – affordable and market housing**
Comments in relation to the need for affordable and market housing are dealt with in chapter 10.

**Employment requirement**
Comments in relation to employment land need are dealt with in chapter 9.

**Local centre**
The Council agrees that further details should be provided in the Vision in chapter 3 on where Warton will be in 2030 and clarify that it will be a local service centre by the end of the plan period. The Council will also include additional information regarding the Lancashire Enterprise Zone and its importance to the UK’s advanced engineering and manufacturing sector within chapter 9 (The Fylde Economy) of the next version of the Local Plan.

**Site H8 Land West of Warton**
The comments of Bryning with Warton Parish Council regarding the open green space along Lytham Road, being allocated for recreational open space are noted. The Council considers that any new residential development in Warton, including site H8, will need to accommodate green infrastructure for both the existing and new residents.

The Council noted the support from residential developers for sites H8 and H9.

Residents’ concerns regarding the relocation of businesses from sites allocated for residential development are noted.

Residents’ comments on site phasing and delivery are noted. The Council has agreed to prepare a new policy on housing requirement, including the phasing and delivery of housing on sites which will be inserted in chapter 10 – Provision of Homes in Fylde.

The Council notes the suggestion from a resident that site H8 should be built first in Warton to enable the provision of a large public space in this area of the village.

Residents’ comments regarding tree preservation orders and wildlife on the site are noted.

The Council notes a resident’s support for the development of this site, together with their support for the development of a wider range of shops in Warton.

**Site H9 Land North of Warton**
The Council noted the support from residential developers for sites H8 and H9 and their claim that it could be delivered earlier than suggested in the phasing.

Residents’ comments regarding biodiversity on the site are noted.

Residents’ comments on site phasing and delivery are noted. The Council has agreed to prepare a new policy on housing requirement, including the phasing and delivery of housing on sites which will be inserted in chapter 10 – Provision of Homes in Fylde.

**Site H10 Land East of Warton**
The Council noted the residential developers concerns over the deliverability of site H10, which they claim is constrained by different land ownership, land in Flood Risk Zones 2 and 3, protected playing fields and land safeguarded for mineral extraction.
Residents’ comments on the number of ponds on the site are noted, together with the site being in a Flood Risk Zone.

Many residents referred to an existing covenant on two triangular areas of land within this site which prohibit any development for 20 years.

Comments made by Sport England and local residents regarding the inclusion of Bridges Playing field within this site and the Boys Brigade training site are noted. The Council considers that any new residential development in Warton, including site H10, will need to accommodate existing and new green infrastructure and existing services and buildings (i.e. the Boys’ Brigade training site).

**Site H12 Former GEC Marconi Factory Site**
The Council notes BAE Systems Real Estate Solutions support for the inclusion of this site and the projected commencement of development on site.

The Council agrees with BAE Systems Real Estate Solutions suggestion to insert a column into the table in policy SL3 regarding potential locations for retail and community facilities, so that these facilities are identified in the Local Plan (Part 1).

Residents’ comments suggesting this site is sufficient to meet Warton’s needs are noted.

The Council considers it necessary to amend policy SL3 and the supporting text to set out the development framework for Warton over the lifetime of the Local Plan to the year 2030.

**Inclusion of land at Warton**
The Local Plan – Issues and Options document set out five spatial options for the distribution of future development. It is correct that none of these options identified the proportion of development at Warton as set out in the ‘Preferred Options’. However, at the Issues and Options stage the Council asked for views as to whether there are any further options for development in the Borough. In addition, some respondents claimed that when considering options for the location of development, the Enterprise Zone at BAE Systems, Warton should be considered, along with linkages, connectivity and accessibility to Preston. This includes consideration of strategic development in North West Preston, the key transport infrastructure improvements that will be required to enable this to take place and its implications for wider connectivity in Fylde.

In considering the Preferred Option, the Council has taken feedback on the alternative options and the findings of the Interim Sustainability Appraisal. Taking these and further discussions with infrastructure providers on board, the Council concluded that none of the five alternative options individually provided a preferred option for the future development in Fylde. Therefore, the Council proposed the spatial development framework set out in the Local Plan – Preferred Options document.

There has been some very significant changes to the evidence base, with respect to Warton, since the Issues and Options document was written in the autumn of 2011. Firstly the Central Lancashire Highways and Transport Masterplan was put out for consultation from 7th January – 25th February 2013 and published in April 2013. This includes the provision of a new junction 2 on the M55 and the proposed construction of the Preston West Distributor road, plus a new park and ride station at Cottam. This new infrastructure provides greatly improved access to Warton. It creates the potential for people to live in Warton and make a relatively short journey to the Park and Ride Station (Cottam Parkway) where they can then easily access the national rail network. This makes Warton a more sustainable settlement and increases its potential to accommodate new development.

Secondly, as a result of the designation of the Lancashire Enterprise Zone which came into effect on 1st April 2012 the Government and a number agencies / bodies, including Fylde Council, place strategic importance on the Enterprise Zone for employment growth. The Local Development Order for the Enterprise Zone at
BAE Systems, Warton was adopted on 1st October 2012. The Enterprise Zone is forecast to lead to the creation of new jobs. People coming to work at Warton should be given the opportunity to live at Warton and new community facilities should be provided for both existing and new residents.

These two very important changes to the evidence base meant that Warton should be regarded as an opportunity to create a more sustainable community. The NPPF was published in March 2012, which was after the Issues and Options document had been written. The NPPF requires a more positive approach to be taken with respect to providing new employment and housing in close proximity.

Unlike the other strategic development locations, Warton is not tightly constrained by Green Belt, flooding, infrastructure constraints or environmental designations. Therefore, given the new evidence and the opportunities offered by new infrastructure, housing allocations were included at Warton. These are intended to complement the jobs that would be created by the Enterprise Zone and the improvements in Warton’s accessibility. In order to ensure that Warton is extended in a sustainable manner, there will also need to be further investment in local facilities as set out in the Preferred Option document.

The evidence base is changing with new evidence being collected on the viability of the Plan, the amount and types of new housing that are needed as well as infrastructure provision. All of this information is being taken into account as the Council prepares the next version of the Local Plan.

Masterplan
The Council considers both the comprehensive masterplanning and infrastructure delivery planning of Warton to be a priority to ensure that all new growth in Warton is planned, phased and delivered. A masterplanning approach would include the following key issues: place-making and design, land-uses, the provision of new green infrastructure and movement and connectivity.

Members Decision
The delivery of a masterplan could be achieved by one of three methods:

1. Evolving and defining policy SL3 to formally set out the objectives and requirements and associated site specific infrastructure, or as a minimum to specifically require the need for a comprehensive masterplan and infrastructure approach prior to determining applications;
2. Introducing a further planning policy stage either by establishing the principle and scale of growth at Warton by allocating land now but with masterplanning to occur through a subsequent Supplementary Planning Document;
3. Focussing on the emerging Neighbourhood Plan process to produce a village wide masterplan and set of policies.

The Members resolved at the Local Plan Steering Group meeting on 5th June 2014 to adopt methods 1) and 3) i.e. to expand policy SL3 in chapter 7 of the Local Plan (Part 1) to set out the objectives and requirements and associated site specific infrastructure and to include an additional policy on masterplans; and for the emerging Bryning with Warton Neighbourhood Plan to include a village wide masterplan.

Recommendations for change
- Standardise the Strategic Locations tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.
• Amend policy SL3 so that it includes a list of all of the infrastructure required to accommodate the level of growth allocated in the strategic location for development.

• Amend policy SL3 to accommodate up to 650 dwellings during the plan period in Warton, rather than the figure of 1160 which is set out in the Preferred Options document. There would need to be a critical mass, in terms of the number of units in Warton, for the level of infrastructure required to be delivered.

• Amend policy SL3 and the supporting text to set out the development framework for Warton over the lifetime of the local plan and insert a column into the table in the policy regarding the potential location(s) for retail and community facilities.

• Update the draft Infrastructure Delivery Plan, incorporating the list of infrastructure requirements which appears in policy SL3 and issue it for consultation alongside the Publication version of the Local Plan.

• Set out in the justification section that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate land use, such as landscaping and infrastructure.

• Identify non developable land, which is in Flood Risk Zone 2 and 3, within the Strategic Location sites on the ‘Maps of the Strategic Locations for Development’ which accompany policies SL1 to SL4 (inclusive).

• Delete the reference in the last sentence of paragraph 7.49 of the Preferred Options document to: “… and new swimming pool (to replace the existing facility at Kirkham).”

• The Council will set out an explanation of the settlement hierarchy (i.e. key service centre, local service centre) and the retail hierarchy (i.e. town, district / village and local centres) in the next version of the Local Plan (Part 1).

• Insert the following text in the fourth paragraph of chapter 3 – A Vision for Fylde: “Warton will be a local service centre with a Village Centre servicing the enlarged community living within and around Warton and employment opportunities will increase and diversify through development at the Lancashire Enterprise Zone, BAE Systems, Warton.” in place of the existing sentence which reads: “Warton will have developed as a result of the Enterprise Zone, with improved local services”.

• The Council will work with the Bryning-with-Warton Neighbourhood Planning Steering Group over a masterplanning exercise as part of the Neighbourhood Plan for Warton.

• The Council will work with Bryning-with-Warton Neighbourhood Planning Steering Group to identify a suitable a mixed use / employment site which compliments the Enterprise Zone.

• Add a new policy on Lancashire Enterprise Zone (BAE Systems, Warton) in chapter 9 – The Fylde Economy.

• Add a new policy on housing requirement, including the phasing and delivery of housing on sites at the start of chapter 10 – Provision of Homes in Fylde.

• Prepare a background paper, comprising a portfolio of sites, which will include strategic site assessments.
Policy SL4: Kirkham and Wesham Strategic Location for Development

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Representations received from:
- Councillor Hardy
- Councillor Nulty
- Kirkham Town Council
- Medlar with Wesham Town Council
- Newton with Clifton Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- Highways Agency
- Blackpool Council
- Lancashire County Council
- Kirkham Grammar School
- 190 Residents
- 4 Residential Developers / Landowners
- 1 Retail Developer

What you said

Further site suggestions
Some residents suggested land south of the A583 Preston – Blackpool Road as an alternative site for housing.

Residents suggested Campbell Caravans and Sunnybank Mill as an alternative.

SHLAA site WS08 is suggested by a residential developer for housing. The Council’s justification for not including this site, as identified in appendix 2 were suggested as being flawed with access through site H13.

Many residents suggested that the Kirkham and Wesham have already taken a large amount of housing and employment development. They also suggested that the bypass provides an identified definitive boundary. Residents claimed that further development would alter the areas character.

Medlar with Wesham Town Council supported the Minority Group Report, with one exception.

Kirkham Town Council objected to the inclusion of site(s) at Kirkham which are beyond the settlement boundary, on the flood plan and on greenfield sites. The Town Council claims that there are sufficient brownfield sites, unoccupied new builds and new build office / employment units in Kirkham.

Cllr Hardy submitted ‘standard letter 1’ comments which were also submitted by Kirkham and Wesham residents.

\[15 \text{ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.}\]
Kirkham Grammar School supported the inclusion of Kirkham and Wesham as a strategic location for development, they suggested that their school playing field identified within site M3 would be suitable for residential development and would link to the Gladman and Bloor Homes schemes.

The existing residential commitments and where further sites are needed were questioned by some residents.

A resident commented that there is no reference to the Clifton, Newton and Salwick Parish Plan.

**Mixed use development.**

A retail developer suggested the policies do not refer to the benefits that suitable scale ancillary development on employment or housing land can achieve. Provision of non-B Class uses, such as retail within strategic locations could promote the establishment of sustainable communities. The retail developer claimed that retail can also provide an important buffer between residential and less sensitive land uses.

**Infrastructure**

The Highways Agency commented that the location of the sites south of the M55 may mean a potential impact on the strategic road network. The Highways Agency welcomed the support for developer funded measures to resolve congestion referred to in paragraph 7.73. The Highways Agency is interested in understanding the evidence which details the level of impact and mitigation/infrastructure improvements required, and whether measures outlined in policy T1 in chapter 12 and the Infrastructure Delivery Plan are sufficient.

The Minority Group Report referred to inadequate infrastructure and pressure the development would create on existing facilities. They suggested to fund adequate infrastructure would be too costly for the number of houses proposed, therefore this would only be phase one and additional housing would be difficult to defend. There would be a loss of farmland and no connectivity to Kirkham and Wesham, poor access and egress and it would not be possible to provide housing within the plan period.

Many residents objected to development in Kirkham and Wesham due to infrastructure:

- Infrastructure cannot cope
- Flooding, poor drainage and sewage provision
- Traffic congestion
- Poor electricity supply
- Overstretched facilities: doctors, dentist, school, railway.

**Flooding**

Lancashire County Council, as a lead local flood authority, commented that several strategic allocations are located within Flood Risk Zone 2 or 3. There is no explanation within the text as to whether the sites meet the sequential and exception tests as outlined in the NPPF Technical guidance. Lancashire County Council claimed its support for strategic site H7 is dependent upon the site meeting the sequential and exception tests. Furthermore, the allocation appears to contradict policy SD1 which prohibits development within Flood Risk Zones 2 or 3.

**Settlement boundaries**

Some residents commented that all sites are outside the settlement boundaries of the towns which contradicts policy GD1 in chapter 8, which directs development to within settlements. Residents also suggested the boundary of the Kirkham – Wesham bypass forms a hard edge and should be protected.

The Minority Group Report commented that employment development at site E4 may leave Junction 3 of the M55 vulnerable to development. Highway infrastructure at Junction 3 and the A585 is currently overburdened and further heavy traffic would be unsustainable. There is no case for employment land and this should be removed.
The Minority Group Report objected to the inclusion of land to west of Kirkham and Wesham as a strategic site. The housing numbers can be accommodated on brownfield land in Kirkham which has not been explored. The bypass forms a hard edge, the proposals are not on the edge of settlements, and they are outside the settlement boundary.

**Housing**

A resident suggested there is already substantial social housing provided and the market has a range of first time buyers’ property.

Residents claim that Kirkham and Wesham have taken a large amount of housing and employment development during the Plan period 1990’s to date. This has had a huge impact on the infrastructure of the two towns, if the development shown in Option 4 is accepted it will cause even more problems for the two towns and will change the character of these areas for ever. The resident claims that the infrastructure problems already experienced relate to flooding to highways and homes as a result of poor drainage and sewage provision, traffic congestion and poor highway safety, increasing demand for school place provision, delays for access to health and associated services and poor electricity supply which results in large areas of Kirkham losing power during periods of high usage.

A resident claims that if this consultation is a genuine attempt to locate housing and employment in areas supported by the community it should take account of residents' views. It is claimed that policy SL2 should replace policy SL4 as a preferred option in the adopted Plan. Whyndyke Farm could be delivered in the Plan period and would provide a school, roads, bus routes, shops, cycle lanes and employment land on one site and it is sustainable; it would also meet the housing and employment needs of Blackpool.

**Site H7 Land North of Dowbridge, Kirkham**

Many residents submitted objections to the inclusion of this site, referring to:

- Highways access and safety
- Insufficient highways infrastructure
- Increased highway traffic and car parking pressure in Kirkham
- Flooding and increased water volume in Dow Brook
- Subsidence and land slippage
- An over-supply of housing
- Loss of property values
- Increased insurance premiums from rising crime
- Noise and light pollution
- Loss of privacy dues to site gradient
- Loss of view
- Impact on residential amenity
- Extra refuse
- Loss of grade 3a agricultural land
- Threat to wildlife, including endangered species
- Landscape impact
- Historical remains and archaeological field interest.
- Inadequate infrastructure
- School places provision

Residents suggested Whyndyke Farm as an alternative site for the housing.

Some residents said they are riparian landowners of Dow Brook, with landownership on both sides of the brook.

Landowners supported the allocation of site H7.

**Site H13 Land North of Mowbreck Lane, Wesham**

Cllr Eastham commented that the type of 'reserves' should be defined in relation to paragraph 7.76.
Cllr Nulty objected to the residual element of the site coming forward for housing, referring to the loss of best and most versatile agricultural land, the threat to Wesham Marsh, and the number of dwellings already built in Wesham over the last 6 years.

Residents questioned the inclusion of the site when it has been refused numerous times on appeal for housing. Residents commented that the best and most versatile agricultural land should not be lost.

A residential developer supported the inclusion of this site, however they suggested further housing should be identified to ensure more sustainable distribution of development. The residential developer claimed that additional development would be directed to Wesham due to Green Belt and Area of Separation (policy GD2), comprising a narrow strip of open land between Wrea Green and Kirkham.

Site M3 Land North of Blackpool Road, Kirkham
Cllr Nulty commented that this site is very unsustainable and remote from the nearest settlement, with footways to Kirkham and Wesham which are unacceptably difficult.

Many residents suggested this site is not sustainable and does not link to Kirkham, creating unnecessary car journeys to access facilities.

A residential developer supported the inclusion of this site, however they suggested the site could be delivered sooner.

Site E4 Land West of Fleetwood Road, Wesham
Blackpool Council suggested reference to measures that will improve the sustainability / connectively of this site could be strengthened in paragraphs 7.69 and 7.87.

Cllr Nulty commented that the site is outside the settlement boundary and there is no evidence of need for these type of economic development in the Wesham / Greenhalgh / Kirkham area. Cllr Nulty also commented that Mill Farm contains small businesses which are unregulated.

Treales, Roseacre and Wharles Parish Council objected to the inclusion of this site, suggesting it is not aligned to Wesham settlement boundary, creating a hard brownfield site between junction 3, Wesham and Kirkham.

Some residents were concerned that Wesham - Greenhalgh – Junction 3 of M55 would become a conurbation. A resident suggested development on this site would undermine the market town of Kirkham.

Residents commented that the site is within Flood Risk Zone 2, contradicting other Local Plan policies and the Vision for Fylde set out in chapter 3. Residents claimed that the displacement of the water would impact on existing development.

A mixed use developer supported the inclusion of the site, but raised concerns over the reference in paragraph 7.87 to the protection of 4.5ha of woodland.

There was support from a resident for Wesham becoming a centre for sports excellence.

Council response

Further Site Suggestions
Further sites suggested by developers, landowners and residents are dealt with in appendix 2.

Mixed use development
The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites. Comments in relation to mixed use development on strategic sites are dealt with under policy GD3 in chapter 8.
Infrastructure
Residents’ and the Minority Group Report’s concerns regarding the existing infrastructure problems in Kirkham and Wesham are noted.

The Council is developing an Infrastructure Delivery Plan, which will set out all of the infrastructure (Transport, Energy, Social and Green infrastructure) which is required to deliver all of the growth proposed in the Local Plan Part 1. The Infrastructure Delivery Plan will deal with matters including school places, doctors and dental surgeries, water supply, flooding, drainage and sewerage provision, highways infrastructure, energy supply and provision of facilities and services. The draft Infrastructure Delivery Plan will be updated and issued for consultation alongside the Publication version of the Local Plan.

The comments and position of the Highways Agency are noted. The Council will engage with the Highways Agency at relevant stages of the Local Plan and Infrastructure Delivery Plan production.

Employment land need
Comments in relation to the Employment Land Need Study and inclusion of the Warton Enterprise Zone are dealt with in chapter 9.

Flooding
Areas within Flood Risk Zone 3 are considered to be at the “highest” risk of flooding. Part of site H7 – Land North of Dowbridge is in Flood Risk Zone 2. Government policy allows housing development in Flood Risk Zone 2 only if the 'Sequential Test' has been met which shows that there are no appropriate alternative sites that are not within Flood Risk Zone 2.

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of land use, such as landscaping and infrastructure. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the Map of Kirkham and Wesham Strategic Location for Development. For strategic location sites with planning permissions, the number of dwellings specified in the application has been used as the site’s capacity. In the next version of the Local Plan, the Council will apply the density on parts of a site with planning permission to the whole of the site.

Comments in relation to sewage and surface water flooding are dealt with in chapter 13.

Medlar with Wesham Town Councils support for the Minority Group Report is noted.

Kirkham Grammar School’s support for the inclusion of Kirkham and Wesham as a strategic location for development is noted together with their suggestion that their school playing field (identified within site M3) would be suitable for residential development.

A resident’s comment regarding there being no reference in the Local Plan to the Clifton, Newton and Salwick Parish Plan is noted.

Settlement boundaries
Kirkham Town Council’s comments regarding the inclusion of site(s) at Kirkham which are on the flood plain and in Flood Risk Zones 2 or 3 are dealt with under ‘Flooding’ in the Council’s Response to policy SL4, above.

Kirkham Town Council’s and residents’ comments in relation to brownfield (previously developed land) versus greenfield sites are dealt with in chapter 6.

Kirkham Town Council, the Minority Group Report’s and residents’ comments that all sites are outside the settlement boundaries of Kirkham and Wesham are noted. The residents go on to claim that this contradicts policy GD1 in chapter 8, which directs development to within settlements. The first paragraph
of policy GD1 refers to development being directed towards existing settlements and, within settlement boundaries. The third paragraph looks at development outside settlement boundaries, which will be assessed against national policy and any relevant Local Plan policies. Consequently, the allocation of land for development outside the existing settlement boundaries of Kirkham and Wesham does not contradict policy GD1.

Proposed development is located outside the existing settlement boundary of Kirkham and Wesham, but, as with other potential allocations, it will be necessary to extend the settlement boundaries in order to incorporate the development land within the settlements.

**Housing**

The comments made by a resident suggesting there is already substantial social housing provided and the market has a range of first time buyers’ property is answered in the Council’s Response to Housing Requirement in chapter 6.

The Council notes residents’ comments regarding replacing policy SL4 with policy SL2 as a preferred option in the adopted Plan. However, as all of the housing growth for Fylde that is projected over the plan period is to be delivered, then land at both Fylde-Blackpool Periphery Strategic Location (policy SL2) and land at Kirkham and Wesham Strategic Location is required. The Council agrees that Whyndyke Farm is a sustainable location which could provide a school, roads, bus routes, shops, cycle lanes and employment land; but development is also required in Kirkham and Wesham.

**Site H7 Land North of Dowbridge, Kirkham**

Residents’ objections to the inclusion of site H7 are noted. Many of the issues raised relate to the impact of new residential development on existing infrastructure (including highways, surface water and wastewater, and the provision of school places) all of which are dealt with under ‘infrastructure’ above. The issue of over-supply of housing is dealt with in the ‘Housing Requirement’ section under the Council Response in chapter 6. The comments regarding wildlife, landscape impact and heritage assets are dealt with in chapter 14. The comments relating to noise and light pollution, loss of privacy, loss of view and impact on residential amenity, and the generation of extra refuse are all issues that relate to specific planning applications rather than to policy SL4.

Residents’ suggestions that Whyndyke Farm be identified as an alternative site for housing, in place of Kirkham and Wesham, is noted. The Council has identified strategic locations for development and has allocated land for housing at Whyndyke Farm and at Kirkham and Wesham so as to meet the overall housing requirement over the lifetime of the Local Plan to the year 2030.

Residents’ claims that they are riparian landowners of Dow Brook are noted.

Landowners support for the allocation of site H7 is noted.

The Council agrees to delete site H7 – Land North of Dowbridge, Kirkham as 42% of the site is located within Flood Risk Zone 2, which lies adjacent to the existing boundary of Kirkham. The developable area of land on site H7 for the construction of houses is located east of the flood risk zone, away from the settlement boundary of Kirkham.

**Site H13 Land North of Mowbreck Lane, Wesham**

The Council agrees with Cllr Eastham that the type of mineral ‘reserves’ (i.e. sand and gravel) should be defined in paragraph 7.76.

Cllr Nulty’s and residents’ comments on the loss of best and most versatile agricultural land and the threat to Wesham Marsh are noted. Any proposal to develop best and most versatile agricultural land or to develop within or in close proximity to a nature conservation site will be considered on its merits, alongside all of the policies in the Local Plan (Part 1).

Residents’ comments regarding the site being refused numerous times on appeal for housing are noted.
The residential developer's support for the inclusion of this site is noted, together with the suggestion that further housing should be identified.

**Site M3 Land North of Blackpool Road, Kirkham (i.e. the Kirkham Triangle)**

Cllr Nulty and residents’ concerns that site M3 is not sustainable and does not link to Kirkham are noted. The Council considers that the site is sustainable as it is located immediately east of the Kirkham bypass, with good connectivity.

The Council noted the support from a residential developer for site M3 and their claim that it could be delivered earlier than suggested in the phasing.

The Council considers that site M3 (Kirkham Triangle) is appropriate for residential use rather than mixed use, and that the site could accommodate an additional 240 dwellings, which were allocated in the Preferred Options document at site H7 – land north of Dowbridge, Kirkham. The residential development on the site will need to be well screened from views in by a comprehensive landscaping scheme including substantial tree belts and green infrastructure.

**Site E4 (Mill Farm) Land West of Fleetwood Road, Wesham**

The Council agrees with Blackpool Council’s suggestion to strengthen the wording in paragraphs 7.69 and 7.87 so as to improve the sustainability / connectivity of this site. The Council considers that site E4, which is allocated for employment and leisure, is located in a sustainable location in close proximity to junction 3 of the M55 with good connectivity to the Lancashire sub-region and to the national motorway network. The site, measuring 4ha, is considered to be a sufficient size to accommodate new and re-located business / employment uses.

The objections raised by Treales, Roseacre and Wharles Parish Council, Cllr Nulty and local residents are noted. The Council considers that there is insufficient space within the existing boundaries of Kirkham and Wesham to accommodate a new 4ha employment site, in close proximity to junction 3 of the M55. The Council considers site E4 to be a sustainable location for a 4ha employment and leisure site.

Cllr Nulty’s comments regarding small businesses, which are unregulated at Mill Farm, are noted. The Council considers that if any unregulated activities are taking place anywhere in Fylde, they need to be reported to and be investigated by the Planning Enforcement Team.

This site was allocated as a mixed use employment and leisure site following responses to the Issues and Options consultation carried out during July 2012 and expressions of developer interest. As part of Issues and Options consultation, AFC Fylde made representations that further leisure facilities were specifically required to serve Kirkham and Wesham and that there should be a growth in sporting and recreational facilities. Other respondents considered that there should be initiatives to promote health and wellbeing and that community facilities should be a priority. During the early stages of producing the Preferred Option, representatives of AFC Fylde approached the Council in order to explore the potential of the site for a mixed leisure and employment development. An application for the mixed use of the site has subsequently been submitted and planning permission has been granted.

The Fylde Employment Land and Premises Study – August 2012 identifies a series of potential sites for future employment land provision. Site E4 is identified as a potential area of search for additional employment land (Page 178 Figure 11). The Study identifies that there will be a need to provide a critical mass in order to deliver the new infrastructure required (paragraph 11.46). It identifies the site as being suitable for a mix of larger B1 (a-c), B2 or B8 units which could also meet the sub regional / regional need for motorway related property.

In identifying the site for potential employment development, the study notes that this site has excellent access to the motorway network, located only 0.7 km from Junction 3 of the M55, whilst it also borders Wesham and can, with the provision of some pedestrian crossings, be accessed from Kirkham and Wesham by foot. The study goes on to identify that development of employment uses here would encourage workers to access Kirkham Town Centre for services, benefiting local businesses. Kirkham and
Wesham Station is only 1 km away and the area is on existing bus routes. \textit{No 76 bus provides an approximately hourly service in each direction between 07:42 to 19:02 Mon to Sat serving St Annes, Kirkham, Gt Eccleston, Poulton and Blackpool.} Thus, the land could serve as both a motorway business park and meet the local needs of Kirkham and Wesham. It is proposed that the requirement to provide improved access by foot and cycle and the provision of bus stops on the A585 will be made clear in the supporting text.

Access could be provided from the A585 / B5192 roundabout, both for this land and the existing employment uses at Mill Farm. The latter is presently constrained by the nature of the access onto the A585. The study notes that the size of any allocation must balance the need to protect countryside land with the need to provide a critical mass of development that will pay for the new infrastructure required. The Employment Land and Premises Study considers that the suggested allocation of 14 ha would be sufficient for this and could be reduced by around 4ha (to 10 ha) to protect key environmental features, if required. The Fylde Employment Land and Premises Study acknowledges the need to protect key environmental features and any development of the site will need to be carried out in a manner which avoids a harsh urban boundary along Fleetwood Road.

The Study did not consider uses outside traditional employment use classes as this was clearly outside its remit. However, the characteristics that make the site potentially suitable for employment uses could equally relate to potential leisure uses.

It is noted that the Preferred Option text refers to the site being partially developed, whilst the allocation itself does not include the established business ventures that currently occupy the buildings at Mill Farm. It is proposed to identify established employment uses that should be protected from alternative uses and the plan should be amended accordingly. The inclusion of this land within the overall allocation would allow for an opportunity to improve access to the existing employment uses at Mill Farm.

With the retention of woodland areas as set out in the supporting text, there would be sufficient space between the proposed allocation and adjacent uses in Greenhalgh to avoid the amalgamation of built development.

The uses identified within the Employment Land Study and the proposed leisure use would complement rather than compete with established business and facilities within Kirkham and Wesham, providing local jobs and facilities.

According to the Environment Agency Flood Map for Planning (Rivers and Sea), the site is not within Flood Risk Zone 2 or 3. As with all sites within Flood Risk Zone 1, it will be necessary for any future developer of the site to demonstrate that the site can be developed in a manner that will not increase the likelihood of flooding on the site or at other locations.

The site is located outside the existing settlement boundary, but, as with other potential allocations, it will be necessary to extend the settlement boundary in order to incorporate the development land within the settlement.

The need to develop socially cohesive, diverse and healthy communities through investment in existing and the provision of new formal sports facilities across the Borough is set out in objective 5 of the Preferred Option. The Spatial Vision aspires to the creation of significant further educational opportunities and leisure facilities for young people being provided.

The Preferred Option notes that the Local Plan is designed to enable appropriate development and flexibility for leisure, culture and tourism operators so that they can invest in or respond to changes in visitor and leisure preferences (paragraph 9.84). The majority of respondents to consultation on the Issues and Options Document were in favour of protecting existing and providing additional leisure and tourism facilities (paragraph 9.94)
The Sustainability Appraisal notes that there are potential positive impacts of developing the site for mixed leisure and employment uses including opportunities for local community entertainment and interaction, being accessible to goods and services in Kirkham and Wesham and / or near to public or sustainable transport modes. The Sustainability Appraisal sounds a note of caution in that, despite relative proximity to Wesham and Kirkham centres and sustainable travel, the proposed location could lead to increased carbon emissions but notes that the location would result in a lower increase than other potential options. The support from a resident of Wesham becoming a centre for sports excellence is noted.

The Council agrees to amend paragraph 7.87 by deleting the reference to the protection of 4.5ha of woodland within site E4 (Land West of Fleetwood Road, Wesham). There is a 4.5ha woodland of conifers on the site, but they are not worthy of protection. The Council is to carry out a landscape assessment of the strategic locations for development and areas of separation and the findings from this work will feed into the next version of the Local Plan (Part 1).

### Recommendations for change

- Standardise the Strategic Location tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.
- Amend policy SL4 so that it includes a list of all of the infrastructure required to accommodate the level of growth allocated in the strategic location for development.
- Delete the entire reference at policy SL4 to “H7 – Land North of Dowbridge, Kirkham (housing)” from policy SL4.
- Delete “mixed use” and replace it with “(housing)” and add (i.e. Kirkham Triangle)” to the site “M3 – Land North of Blackpool Road, Kirkham” at policy SL4. The whole of this site will be for residential development.
- Remove the figure of “9 ha” of employment land from the column under site “M3 – Land North of Blackpool Road, Kirkham” at policy SL4 and amend the total employment over plan period from “13” ha to “4” ha.
- Amend the Inset Map of Kirkham and Wesham and the Map of Strategic Sites, deleting site H7: Land North of Dowbridge, Kirkham and changing site M3 (Land North of Blackpool Road, Kirkham) from “mixed use” to “housing”.
- Delete paragraphs 7.79, 7.80 and 7.81 and the sub-heading “Land North of Dowbridge, Kirkham (site H7)” from the Preferred Options document.
- Amend the first sentence of paragraph 7.82 of the Preferred Options document by replacing the words “mixed use” with “This residential site …” in reference to Land North of Blackpool Road, Kirkham (site M3).
- Add a new sentence after paragraph 7.86 of the Preferred Options document saying: “The residential development on the Kirkham Triangle (site M3) will need to be well screened, from views into the site, by a comprehensive landscaping scheme including substantial tree belts and the provision of green infrastructure.”
- Set out in the justification section to the policy that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate land uses, such as landscaping, sustainable drainage systems and infrastructure.
• Identify non developable land, which is in Flood Risk Zone 2 and 3, within the Strategic Location sites on the 'Maps of the Strategic Locations for Development' which accompany policies SL1 to SL4 (inclusive).

• Strengthen the wording in paragraphs 7.69 and 7.87 of the Preferred Options so as to improve the sustainability / connectively of site E4 – Land West of Fleetwood Road, Wesham.

• Amend the last sentence of paragraph 7.76 of the Preferred Options to read: “…quality of the reserves of sand and gravel and whether there is a case for prior extraction”.

• Amend paragraph 7.87 of the Preferred Options by deleting the words “…which will be protected …” from the first sentence of the paragraph.

• Revisit the boundaries on the Inset Map of site E4: Land West of Fleetwood Road, Wesham (i.e. the Mill Farm site).

• Prepare a background paper, comprising a portfolio of sites, which will include strategic site’ assessments.

• Update the draft Infrastructure Delivery Plan, incorporating the list of infrastructure requirements which appears in policy SL4 and issue it for consultation alongside the Publication version of the Local Plan.
Chapter 8: General Development Policies

Chapter 8 General Comments:

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Representations received from:
- BAE Systems Real Estate Solution

What you said

In relation to paragraph 8.1, BAE Systems Real Estate Solutions suggested the existing settlement boundary within the Fylde Borough Local Plan for Warton is outdated and does not reflect the urban character of Warton Aerodrome. The Warton settlement boundary does not reflect the importance of the Aerodrome and the Enterprise Zone to the growth and development of Warton and the borough as a whole. The boundary for Warton should show an amendment to include the northern part of the Warton Aerodrome within the settlement boundary.

It was also suggested that the inset maps and strategic sites maps should show the settlement boundaries within the adopted Local Plan as well as the Strategic Development Sites.

Council response

The Council does not agree with BAE Systems Real Estate Solutions that the northern part of the Warton Aerodrome should be included within the Warton settlement boundary. The Aerodrome is identified as employment land on the existing Fylde Borough Local Plan Proposals Map. The Council will identify all of the existing employment sites, including the Enterprise Zone, together with all the new employment allocations on the Policies Map.

The Council will identify all of the existing settlement boundaries from the adopted Fylde Borough Local Plan (As altered: October 2005) alongside the proposed Strategic Development Sites on relevant inset and strategic sites maps, and on the new Policies Map which will be prepared to accompany the Publication version of the Local Plan (Part 1).

Recommendations for change

- Identify all of the existing employment sites, including the Enterprise Zone, together with all the new employment allocations on the Policies Map.

- Add existing settlement boundaries from the adopted Fylde Borough Local Plan (As altered: October 2005) to the inset and strategic sites maps and on to the new Policies Map, which will be prepared to accompany the Publication version.
Representations received from:

- English Heritage
- Highways Agency
- United Utilities
- Campaign to Protect Rural England (CPRE) – Fylde District
- Singleton Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- 2 residential developers
- 1 retail developer
- 45 Residents

**What you said**

*Retain existing settlement boundaries and Countryside policy*

A number of residents suggested that the existing settlement boundary for Warton should remain and sites H8, H9 and H10 should be excluded from inclusion within the settlement boundary as they are not sustainable.

Residents questioned the need for development within the countryside, contrary to policies SP2 and SP9 in the current adopted Fylde Borough Local Plan (As Altered October 2005).

CPRE – Fylde District objected to the removal of countryside designation and policy for Development in the Countryside. CPRE – Fylde District claimed that Countryside Area and Green Belt should be referred to within policies H5 and H6 in chapter 10.

*Previously Developed Land (brownfield land)*

The Minority Group Report claimed that greenfield land should only be built on as a last resort.

Some residents claimed that all sites within Kirkham and Wesham Strategic Location for development (policy SL4) are contrary to policy GD1, which directs development within settlement boundaries and brownfield sites first. Treales, Roseacre and Wharles Parish Council supported this view, referring to site E4: Land West of Fleetwood Road, Wesham (in policy SL4). The Parish Council also supported brownfield sites in Warton for development.

Singleton Parish Council stated brownfield sites should be used wherever possible, rather than edge of settlements. Some residents suggested that brownfield sites should be built on fully before greenfield sites are granted planning permission.

CPRE – Fylde District suggested introducing local brownfield targets to replace the Regional Spatial Strategy (in accordance with paragraph 111 in NPPF). The target should be based on an estimate of

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16 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
brownfield sites coming forward in the plan period, including allowances for conversions, windfall and redundant employment sites.

The Highways Agency were generally supportive of encouraging the efficient use of land and in particular maximising the use of previously developed land, in preference to greenfield, and directing development towards existing settlements, where there is better access to existing services / facilities and a variety of sustainable modes of transport.

Housing requirement
A residential developer considered that it was premature to make decisions on the settlement boundary until future housing requirement is established. They did, however, support the flexibility of the policy in the context of national planning policy.

A retail developer suggested that if identified needs are not met during the plan period, development outside existing settlement boundaries should be considered positively, subject to other Local and National Policy.

Inclusion of BAE Systems within settlement boundary
BAE Systems Real Estate Solutions disagreed with the second sentence of paragraph 8.4. Warton Aerodrome is designated as an existing industrial area located outside the existing settlement. The character of the northern part of Warton Aerodrome is urban in form and scale and would not relate to the character of the Green Belt or Countryside area.

GD1 policy justification
The Environment Agency recommended the following amendment to the 7th bullet point in paragraph 8.3, to read: “whether the proposal is at risk of flooding and/or will result in an increase in surface water run-off”.

United Utilities recommended amendments to the 7th bullet point in paragraph 8.3, to read: “Whether the proposals present the most sustainable form of managing surface water from the site. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available.”

English Heritage recommended the inclusion of the historic environment within the criteria list for acceptability of the redevelopment of land within settlements within paragraph 8.3, with particular reference to the contribution the site makes to the character and setting of the local area. English Heritage referred to the NPPF requirement that a proper assessment should be made to identify land, which would be inappropriate for development because of its historic significance.

Green Belt and Agricultural Land
A residential developer promoted the removal of Blackpool Football Training Ground from the Green Belt for redevelopment.

CPRE – Fylde District sought clarification for the misleading reference in paragraph 8.5 to “former non-Green Belt land outside settlements”.

CPRE – Fylde District suggested producing a map of best and most versatile agricultural land to assist consideration of such land, referred to within the justification for policy GD1.

Council response
Retain existing settlement boundaries and Countryside policy
The adopted Fylde Borough Local Plan (As Altered: October 2005) was based on a ‘moratorium’ position following a very low previous housing requirement, therefore the Plan did not contain any residential land
allocations. In regards to the countryside, policy SP2 (Development in the Countryside Area) and policy SP9 (Diversification of the Rural Economy) resisted residential development except in exceptional circumstances.

Due to a higher housing requirement, the Council no longer operates a ‘moratorium’ position. The Council’s Strategic Housing Land Availability Assessment (SHLAA) has demonstrated that there is insufficient land within the existing settlement boundaries to meet the Borough’s housing requirement and some sustainable sites on the edge of existing settlements will need to be identified for housing. The Council can therefore no longer operate a restrictive policy stance in regard to residential development in the countryside.

In regards to Warton, the settlement has been demonstrated to have some facilities and services to make it a sustainable settlement. Contributions towards the provision of improved local facilities, services and infrastructure will be required and will further enhance the settlement’s sustainability.

As mentioned above, the Council does not agree with BAE Systems Real Estate Solutions that the northern part of the Warton Aerodrome should be included within the Warton settlement boundary.

CPRE – Fylde District objected to the removal of countryside designation and policy for Development in the Countryside. The Council agrees to re-introduce the countryside designation into the next version of the Local Plan. However, it is considered that there is no need for a policy on Development in the Countryside as these issues are already dealt with in the detailed development management policies within the Local Plan.

**Previously Developed Land (brownfield land)**

Paragraph 17 of the NPPF sets out twelve core planning principles, number 6 states the following:

- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value.

The NPPF does not specify that brownfield land should be used first.

Objective 1.4) refers to making the best use of previously developed land to reduce the loss of greenfield land. However, unlike some other areas of Lancashire, Fylde does have limited amounts of brownfield land. The Preferred Options document makes an allowance for small sites and windfalls of 31% of the total requirement. It is expected that a proportion of these sites will be brownfield.

Paragraph 6.2 of chapter 6: The Spatial Development Framework refers to: “the Strategic Housing Land Availability Assessment 2012 update (SHLAA) which demonstrates that there is not enough available brownfield land in the Borough to accommodate all new development and sites have been identified for development on some sustainable greenfield land at the edge of existing settlements”.

**Housing requirement**

Comments in relation to housing requirement are dealt with in chapter 6.

**Mixed use**

Comments in relation to mixed use on residential sites are dealt with under policy GD3, below.

**Inclusion of BAE Systems within settlement boundary**

As mentioned above, the Council does not agree with BAE Systems Real Estate Solutions that the northern part of the Warton Aerodrome should be included within the Warton settlement boundary.

**GD1 policy justification**

The Council agrees with the recommendations submitted by the Environment Agency and English Heritage. Recommendations submitted by United Utilities will be included in policy CL1 and the justification text in chapter 13.
Comments in relation to an assessment of land, inappropriate for development because of its historic significance, are dealt with in chapter 14.

**Green Belt**
The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. The Council has demonstrated through its Strategic Housing Land Availability Assessment (SHLAA) that there is sufficient land located outside the Green Belt to meet the borough housing requirement. The Council is therefore not proposing a strategic review of the Green Belt, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies.

The reference in paragraph 8.5 to “former non-Green Belt land” is a mistake, it should have only referred to “land outside settlements”.

The Council considers that it is not necessary to present best and most versatile agricultural land on the Policies Map. Up-to-date maps of best and most versatile agricultural land are held by Natural England on their website.

### Recommendations for change

- Re-word the 7th bullet point in paragraph 8.3 of the Preferred Options to read: “Whether the proposal is at risk of flooding and / or will result in an increase in surface water run-off. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available.”

- Add ‘the historic environment’ to 2nd paragraph, of policy GD1. The text should read: “…open and recreational space, the historic environment and nature conservation …”

- Add the following bullet point to paragraph 8.3 of the Preferred Options: “The historic environment with particular reference to the contribution the site makes to the character and setting of the local area”.

- Amend paragraph 8.5 of the Preferred Options by deleting “former non-Green Belt” and retaining “land outside settlements”.

- Add existing settlement boundaries to inset maps, the strategic sites maps and to the new Policies Map, which will be prepared to accompany the Publication version of the Local Plan.
Policy GD2: Area of Separation

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Representations received from:
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Councillor Hardy
- Councillor Speak
- Greenhalgh with Thistleton Parish Council
- Newton with Clifton Parish Council
- Treales, Roseacre and Wharles Parish Council
- Campaign to Protect Rural England (CPRE) – Fylde District
- The Minority Group Report
- 1 residential developer
- 154 Residents

What you said

There were many objections to the policy, with other areas of separation suggested at:

- North of Warton between Warton and Wrea Green;
- Dow Brook/Spen Brook, Kirkham, to Treales;
- Moorside, Treales, to Wesham, including Mowbreck Lane, Church View Farm and the countryside either side of Mowbreck Lane down to Dow Brook, Kirkham;
- Land between Dowbridge, Kirkham and Newton;
- Land west of Westby between Westby and Whitehills;
- Land between Wesham and Greenhalgh;
- Land between Poulton and Singleton;
- Land between Clifton village, and Salwick toward Lea and Bartle/Preston
- Land to the west of Kirkham to Westby;
- Land to the north of Kirkham to Wesham;
- Land to the east of Kirkham to Newton; and
- Land around Kirkham, Wesham and Greenhalgh
- Whyndyke Farm

Cllr Speak, Cllr Hardy and Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors, and the Minority Group Report supported further areas of separation.

Greenhalgh-with-Thistleton; Treales, Roseacre and Wharles and Newton-with-Clifton Parish Councils supported the policy and suggested further areas of separation.

Many residents suggested an extension to the existing Green Belt at Freckleton to surround the current settlement boundary of Warton.

It was suggested that the policy is unsound and not satisfactorily justified. The approach to establishing Green Belt should be applied given it is essentially the same policy approach.

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17 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
CPRE – Fylde District commended the Council for the protection of the Green Belt and generally supported policies which resist inappropriate development in the Green Belt and other minor alterations. CPRE – Fylde District also suggested additional areas of separation.

Council response

In response to the residents’ suggested extension to the existing Green Belt at Freckleton to surround the current settlement boundary of Warton, the Council is not proposing a strategic review of the boundaries of the Green Belt as part of the preparation of the Local Plan.

The overarching principle of the area of separation is to maintain the identity and distinctiveness of the settlements of Wrea Green and Kirkham, which could be at threat of merging. Although not supported by government policy in the same way as Green Belt, areas of separation can serve to identify smaller areas of separation between settlements. In the case of Wrea Green and Kirkham, this narrow strip of land measures 1,052 metres at its narrowest point. It is important that this narrow strip of land is protected from development, in order to prevent the gap becoming any narrower.

The Council will prepare a background paper in support of the Area of Separation policy, including an assessment of additional areas of separation. The Council is going to consider all new area of separation sites put forward in the background paper. The Council also considers that there is a need to carry out landscape assessment work on the strategic locations for development across the Borough, including landscape buffers, to provide a robust evidence base and justification for policy GD2, together with policy ENV1: Landscape, in chapter 14.

Paragraph 8.7 says: “No strategic review of the Green Belt within Fylde Borough will be undertaken when producing the Local Plan, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies”. The Council will consider making minor amendments to Green Belt boundaries if needed for strategic sites in Part 1 of the Local Plan.

Recommendations for change

- Prepare a background paper, including a map of all of the suggested areas of separation, to justify policy approach. The background paper will also go through each of the suggested further areas of separation and explain whether or not they are being taken forward in the Local Plan (Part 1).

- Add the following text to the end of paragraph 8.8 of the Preferred Options: “The Council will carry out landscape assessment work at the strategic locations for development across the Borough, part of this work will determine whether or not further areas of separation should be designated”.

- The Council will consider making minor amendments to Green Belt boundaries if needed for strategic sites in the Local Plan (Part 1).
Policy GD3: Promoting Mixed Use Development

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<td>Comment</td>
<td>Support</td>
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<td>2</td>
<td>2</td>
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Representations received from:
- Highways Agency
- BAE Systems Real Estate Solutions
- Sport England
- 1 Retail developer
- 1 Resident

What you said

There was support for the policy, with suggestions that the policy should be expanded to support mixed use development in all locations.

A retail developer suggested that policy SL3 in chapter 7 contradicts policy GD3 by only identifying housing and no mixed use or employment use at Warton.

The Highways Agency supported the promotion of mixed use development within close proximity to key centres and sustainable transport modes, as such an approach will help to reduce trip distance between homes, jobs and services, promote linked trips and help to facilitate a reduction in the need to travel particularly by private car.

BAE Systems Real Estate Solutions suggested the promotion of mixed use on land which is dominated by a single land use where there is evidence that it is no longer required and its redevelopment for mixed use would help to create a more diverse economy and deliver sustainable communities.

Sport England would welcome the inclusion of ‘sport’ in parts a) and b) of policy GD3.

Council response

Policy GD3 supports mixed use development, in accordance with the NPPF.

Members Decision

Should provision be made for a mixed use and/or employment site at Warton?

Members agreed at the LPSG meeting on 5th June 2014 that there should be a mixed use/employment site at Warton, which complements the Enterprise Zone. The Council will work with the Bryning and Warton Neighbourhood Planning Steering Group to identify a suitable site.

The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites (policies SL1 and SL3) in chapter 7. Policy GD3 needs to be expanded to say that a mixed use on the residential sites would be supported providing it does not undermine the housing delivery on that site and it accords with other policies in the Local Plan. The Council does not want employment allocations turning into mixed use with residential and employment development.

09/07/2014 Version 1.5
The Council agrees to add references to sport in parts a) and b) of policy GD3, in line with Sport England’s comments.

**Recommendations for change**

- Add a new criterion to policy GD3: “A mixed use at the strategic locations would be supported providing it does not undermine the housing delivery on that allocation and it accords with other policies in the Local Plan”.
- Amend part a) of policy GD3 to read: “… business, sport and recreation, open space and …”
- Amend part b) of policy GD3 to read: “… include business, sport and open space.”

**Policy GD4: Large Developed Sites in the Countryside**

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<tr>
<th>Comment</th>
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<td></td>
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<td>4</td>
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Representations received from:
- Highways Agency
- English Heritage
- Campaign to Protect Rural England (CPRE) – Fylde District
- Residents of Mythop Road

**What you said**

The Highways Agency were generally supportive of providing development within the rural area where it is an appropriate scale and addresses identified housing or employment need. Essential infrastructure, such as public transport would be supported.

CPRE – Fylde District suggested ‘landscape setting’ is added to criterion a) of policy GD4.

English Heritage recommended reference to the ‘historic environment’ in criterion a), in particular the contribution the site makes to the character and setting of the local area and potential undesignated archaeological assets.

Residents of Mythop Road proposed that it would not be possible to resolve water issues at Fylde-Blackpool Periphery without infringing on policy GD4.

**Council response**

The Council agrees to add ‘landscape setting’ and ‘historic environment’ to criterion a) of policy GD4.

The Council note the comments made by the Highways Agency regarding the public transport infrastructure and residents of Mythop Road with reference to water issues at Fylde-Blackpool Periphery. The Local Plan is accompanied by an Infrastructure Delivery Plan, which is being developed in consultation with key infrastructure providers. The Infrastructure Delivery Plan sets out the infrastructure and services that will
be required to support all of the growth and development that is being proposed in the Local Plan, including the provision of public transport, water supply and wastewater provision; together with details of costs, funding and delivery. The draft Infrastructure Delivery Plan will be amended and issued for consultation alongside the Publication version of the Local Plan (Part 1).

**Recommendations for change**

- Amend criterion a) of policy GD4 so that it reads: “The proposal would have no greater impact on the character, appearance or nature conservation value of the countryside, Area of Separation, landscape setting, historic environment or Green Belt than the existing development, in terms of footprint, massing and height of the buildings;”

- Amend paragraph 8.15 of the Preferred Options document to read: “It is important that redevelopment of existing or redundant large developed sites in the countryside and Green Belt respects the character of the countryside area or Green Belt land in which they are situated; together with the historic environment, in particular the contribution the site makes to the character and setting of the local area and potential undesignated archaeological assets. Such sites include Kirkham Prison and Weeton Camp …”

- Issue the draft Infrastructure Delivery Plan, which will be amended and re-issued for consultation alongside the Publication version of the Local Plan (Part 1).
Chapter 9: The Fylde Economy

Chapter 9 General Comments:

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<td>Comment</td>
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<td>9</td>
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Representations received from:
- Blackpool Council
- Lancashire County Council
- Campaign to Protect Rural England (CPRE)
- BAE Systems Real Estate Solutions
- Federation of Small Businesses
- Blackpool Fylde and Wyre Trade Union Council
- 3 residents

What you said

A resident commented that the High Tech development in Warton needs supporting by service industries.

Several residents commented on the information provided in the 2012 study. It considered four other approaches all of which indicated that there was no need for additional employment land. These factors make the Preferred Options proposal highly questionable as the reality is that in overall terms the amount of employment land in use will either stay broadly the same or reduce.

Blackpool Council welcomed the recognition of the employment market of the wider Fylde Coast Sub-Region.

Lancashire County Council suggested that housing growth ambitions should support strategic economic development priorities including BAE Systems, Warton existing operations and the delivery of the Enterprise Zone site.

CPRE – Fylde District recommended that the employment land requirement, including the needs of Blackpool, is revised by reviewing the findings of the Study and the implications of the Warton Enterprise Zone.

BAE Systems Real Estate Solutions commented that policy EC1 should recognise that mixed use development on employment land may help to bring about improvements in the residual supply that will help meet the future need and demand for employment purposes. A cross-reference to policy GD3: ‘Promoting Mixed Use Development’ in chapter 8 would assist in this.

The Federation of Small Businesses was pleased the Plan did not see the need for additional large retailer provision in the immediate future. The evidence suggests that local spend with local small businesses is much more likely to be re-spent again in the local area. Vitality and viability of our town centres is therefore of great importance. The Federation agreed with the key objectives in the economy strand of the Preferred

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18 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
Options document. The Federation commented that Leisure, Culture and Tourism promotion are also key and these should be part of each Town Centre Management Plan.

Blackpool, Fylde and Wyre Trade Union Council welcomed new homes being made available for people and would like to see the building work being done by local workers.

Council response

The Council will consider how best to encourage service industries to support high tech development in Warton.

Comments relating to mixed use on employment land are dealt with under Policy GD3 in chapter 8, together with the following Members Decision.

<table>
<thead>
<tr>
<th>Members Decision</th>
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<tbody>
<tr>
<td>Should provision be made for a mixed use and / or employment site at Warton?</td>
</tr>
<tr>
<td>Members agreed at the LPSG meeting on 5th June 2014 that there should be a mixed use / employment site at Warton, which compliments the Enterprise Zone. The Council will work with the Bryning and Warton Neighbourhood Planning Steering Group to identify a suitable site.</td>
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The cross reference to policy GD3 is not considered necessary. This is a general development policy that runs across the whole of the Local Plan as a cross cutting theme.

Comments relating to the Employment Land Study 2012 and the employment land requirement are addressed under policy EC1.

The comments made by Blackpool Council and the Federation of Small Businesses are noted.

Comments relating to the housing growth needed to support strategic economic development priorities are addressed under chapters 6 and 7.

The Council will consider whether or not to include a policy on employing local workers as suggested by the Blackpool, Fylde and Wyre Trade Union Council.

<table>
<thead>
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<th>Recommendations for change</th>
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Policy EC1: Overall Provision of Employment Land

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<td><strong>Comment</strong></td>
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Representations received from:
- Greenhalgh with Thistleton Parish Council
- Treales Roseacre and Wharles Parish Council
- Kirkham Town Council
- Lancashire County Council
- Blackpool Council
- Wyre Borough Council
- Blackpool International Airport
- Highways Agency
- Campaign to Protect Rural England (CPRE) – Fylde District
- The Minority Group Report
- 1 retail developer
- 1 mixed use developer
- 4 Residents

What you said

A number of respondents challenged the future requirement being based upon historical take-up. Although there has been consistent take-up of employment land in Fylde, there has also been significant loss of existing employment land, particularly to housing.

A number of respondents made comments suggesting either the deletion of particular sites from this policy, or that the policy be amended to support a broader mix of commercial uses. A mixed use developer suggested for example that an expanded site M1 – Land East of Cropper Road (policy SL2 in chapter 7) covering a wider area, could include retail, hotel, non-residential institutions, assembly and leisure and sui generis commercial uses.

The mixed use developer also commented that the Employment Land review is out of date, insofar as it applies to the Former EDS Site, Heyhouses Lane - site H4 (policy SL1), which has subsequently been approved for a mixed use scheme. Particular reference is made to the use of incorrect assumptions around the future supply of land employment land within the Borough and wider Fylde Coast area which is greater than the Employment Land review indicates.

Greenhalgh with Thistleton Parish Council commented that the proposal for 49 hectares is based on a historical projection of greenfield allocations even though there is surplus brownfield / existing allocations. They also said there is no demand for land at this time, particularly for the regionally important / logistical use identified at Junction 3 of the M55. Provision is made for a sizeable leisure allocation within these lands for which there is no evidence. The Parish Council sees no justification for the inclusion of sites at Kirkham and Wesham in the plan period.

Treales Roseacre and Wharles Parish Council commented that the Warton Enterprise Zone needs to be incorporated into the quantitative assessment of the provision of employment land. Brownfield sites should be considered ahead of site E4 – Land West of Fleetwood Road, Wesham, which is greenfield. The Parish Council sees no justification for the inclusion of sites at Kirkham and Wesham in the plan period.

\(^1\) Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
Council suggested that the inclusion of site E4 is in conflict with the Fylde Vision that the highest quality agricultural land will have been protected from inappropriate development.

Kirkham Town Council suggested that policy EC1 should be replaced with policy SL2, so as to ensure a strategic location for development whilst enabling the towns and villages of Rural Fylde to retain their identity with clear areas of separation, whilst retaining sufficient growth to meet their needs within the existing towns and village boundaries.

The Minority Group Report commented on the Employment and Economic Land Study, the consultant determined that whatever statistical approach was used, there was no actual need for additional employment land. The suggested new locations on the Lytham boundary, Poulton boundary, Blackpool International Airport, Whitehills, Kirkham, Wesham and Greenhalgh was simply to offer choice and in the case of Wesham, Kirkham and Greenhalgh access to a Motorway junction, but the report could not offer any need at this time for such locations. The Minority Group Report suggested that the evidence base is flawed resulting in over-allocation of employment land. Part of this allocation could be used for housing, reducing the amount of housing to be built elsewhere. The Minority Group Report raised concerns that the Employment Land Study has not been out to public consultation and was not included in the Preferred Options consultation. The Minority Group Report suggested there is surplus employment land which could be used for housing.

Wyre Borough Council noted that the amount of employment land proposed in the Local Plan, at 49 hectares, includes an element of 15 hectares to provide for Blackpool's needs.

Blackpool Council welcomed the commitment to provide additional employment land to meet Blackpool's employment land needs. They also supported the identification of land at Blackpool International Airport for employment development (site E2) but queried why this precludes Class B1 (b), B1 (c), B2 and B8 uses. Blackpool Council also supported the 20ha allocation of land at Whynsyke Farm for employment development (site M2) and the appropriate use classes for the site, in accordance with recommendations set out in the Employment Land and Premises Study (2012).

Policy EC1 also provides policy for existing employment sites and says that within the existing employment sites identified in the Fylde Borough Local Plan (policy EMP2), land and premises will be retained in B use classes unless it is demonstrated to the satisfaction of the local planning authority that there is no reasonable prospect of the site being used for employment purposes. Blackpool Council has some concerns with the part of the policy which seeks to retain land and premises in B use classes. Blackpool Council suggested there is the potential for it to be more strongly worded in order to retain some employment uses on existing sites and allow non B uses only in exceptional circumstances.

Lancashire County Council suggested that further consideration should be given to a broader mix of uses as enabling development at Site E2, Blackpool International Airport.

Blackpool International Airport noted that policies SL2 (in chapter 7) and EC1, identify 5ha of land (site E2) as a strategic location for development. They commented that the area identified is actually 10ha.

Blackpool International Airport sought a policy framework which:

- Establishes the Council’s ongoing commitment to support the continued operation and viability of the Airport as an important regional facility;
- Identifies the Airport as an area of change; and
- Provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting the Airport).

In respect of the latter bullet point Blackpool International Airport suggested that commercial development would be suitable on site E2.
The Highways Agency was generally supportive of focussing employment development close to existing Key Centres, given the benefits of good access to existing transport services and facilities. The Highways Agency were, however, concerned for the potential of increased congestion at junction 4 of the M55 and on the A585. A cumulative impact assessment of the employment provisions needs to be undertaken to understand the scale of the impacts and the level of mitigation required.

The Highways Agency emphasised the need for an efficiently operating strategic road network in supporting economic growth and expected consideration to be given to the impacts (additional travel demands), the measures (policy and infrastructure interventions) and the effect / adequacy of these measures to support the development aspirations.

CPRE – Fylde District commented that there is no evidence of leisure development land requirements at site E4. Evidence of the need to designate greenfield land for leisure purposes should be provided, and the classes of leisure development allowed in greenfield Countryside Area locations defined.

**Council response**

The Employment Land and Premises Study 2012 considers five models for the assessment of employment land allocations for the forthcoming Local Plan period. These are:

1. Projection forward of historic land take-up
2. Policy off - Forecast based on employment projections
3. Policy off - Labour supply projection
4. Policy on - Forecast based on employment projections
5. Policy on - Labour supply projection

In other local authority areas where similar studies have been completed, the use of employment and labour supply models has frequently generated unusually negative outcomes. In instances where BE Group has been involved these models have been discounted in favour of historic land take-up trends.

The study bases the requirement for Fylde’s future employment land on the evidence of annual average take-up rate experienced by the Borough since 1989. This is considered to be a long term trend.

In accordance with the ODPM ‘Employment Land Reviews - Guidance Note’, the study identified the most appropriate broad locations for future employment land provision. In maximising the Borough’s assets consideration has been given to being accessible by public transport; environmental impact; viability (in terms of market demand); and being close to population centres. The Enterprise Zone at BAE Systems, Warton was excluded from this stage of the study as it is a planned re-use of an established employment allocation, and purports to serve as a location for specific industry sectors relevant to the site’s current use.

The Employment and Land Premises Study 2012 recommends the protection of the identified current land supply that is not the subject of existing consents for alternative uses. Non B use class uses should therefore only be considered in exceptional circumstances. In exceptional circumstances appropriate enabling development will be supported on existing employment sites in order to support retention of employment uses on these sites.

The Local Plan should be read as a whole, in accordance with the proposed new wording in chapter 1, and every policy and justification should be considered alongside all of the other policies and balance needs to be made when considering planning applications.

The Employment Land and Premises Study 2012 recommends the Blackpool International Airport land for B1(a) offices at paragraph 11.18 and Table 66. However, at paragraph 11.17 of the Employment Land and Premises Study, it is stated that at least half of the land should be allocated for B1, B2 and B8 employment uses. In paragraph 11.17 of the Study, BE Group were making the general comment that half the site
should be secured for B-class employment, rather than retail, etc. Uses considered to be suitable would reflect what is already in place on Amy Johnson Way.

The Employment Land and Premises Study is part of the Local Plan evidence base. The Council does not normally undertake public consultation exclusively on its evidence base. The Employment Land and Premises Study was available as part of the Preferred Options consultation and respondents have commented on the study’s findings. These representations will be considered by the Council as it works towards the next version of the Local Plan (Part 1).

Comments raised in relation to flexibility at Blackpool International Airport are dealt with under policy T2 in chapter 12.

A cumulative impact assessment of the employment provisions will be undertaken in respect of an efficiently operating strategic road network.

Specific comments relating to site H4 (Former EDS Site, Heyhouses Lane) are addressed under policy SL1 in chapter 7.

Justification for leisure development land requirements at site E4 are addressed under policy SL4 in chapter 7.

The Council will identify all of the existing employment land and sites identified in policy EC1 on the new Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).

Recommendations for change

- Amend paragraph 9.10 of the Preferred Options document to read: “It is therefore acknowledged that Blackpool’s administrative area is characterised by a tightly constrained boundary and its employment land requirement of 14 ha cannot be accommodated on lands within its boundary. Consequently, this results in a combined shortfall of employment land for Fylde and Blackpool, up to 2030, of 49 ha / Fylde 34 ha plus Blackpool 14 ha”.

- Amend policy EC1 table relevant to: “Site E2 – Blackpool International Airport – to include B1 (b), B1 (c), B2 and B8 as appropriate use classes”.

- Delete the reference to site “M3 – Land North of Blackpool Road, Kirkham or locally known as ‘Kirkham Triangle’ – (mixed use)” from Policy EC1 of the Preferred Options document.

- In paragraph 9.14 of the Preferred Options document clarify that it is important to ensure that employment uses are maximized at Whyndyke Farm and land east of Cropper Road to capitalise on their location close to junction 4 of the M55.

- Identify the boundary of the Lancashire Enterprise Zone at BAE Systems, Warton, the existing employment allocations that are carried forward from the adopted Fylde Borough Local Plan and proposed new employment allocations identified in policy EC1 of the Preferred Options document on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).

- Revise the Employment Land Study in the light of new employment land information.
Policy EC2: Managing Development of Employment Land

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Representations received from:
- Lancashire County Council
- Lancashire Enterprise Partnership
- BAE Systems Real Estate Solutions
- Highways Agency
- United Utilities

What you said

BAE Systems Real Estate Solutions supported the inclusion of paragraphs 9.19 to 9.23, relating to ‘The Enterprise Zone’. This section should also ensure that there is protection and safeguarding for ongoing and future operations related to the airfield at Warton Aerodrome.

They also commented that in the third line of paragraph 9.20, ‘British Aerospace’ should be replaced with ‘BAE Systems’.

Lancashire County Council and Lancashire Enterprise Partnership commented that under paragraph 9.19 the Enterprise Zone was announced in the Chancellor’s Autumn 2011 Statement, (acknowledged in 1.2.1 of the Warton Local Development Order).

In paragraph 9.20, the focus of the Enterprise Zone is advanced engineering and manufacturing. The regional skills centre / academy is at Samlesbury (which is acknowledged in paragraph 1.2.6 of the Warton Local Development Order).

Lancashire County Council also commented that the strategic importance of the Enterprise Zone at Warton needs to be positioned within the Plan. This should include developing a separate policy for the site as a strategic location.

LCC commented that manufacturing associated with the nuclear industry falls outside Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations (Statutory Instrument 2011/1824) and does not include the production, enrichment, storage, or disposal of nuclear fuel.

The Highways Agency welcomed the recognition that the scale of development should be compatible with the level of existing or potential public transport accessibility.

United Utilities suggested the addition of a further criterion to policy EC2:

‘The Council will take account of the following factors when assessing all development proposals for employment uses:

h) the impact on foul and surface water drainage infrastructure especially the need to secure the most sustainable approach to surface water drainage.’

Council response

The Council agrees to incorporate BAE Systems Real Estate Solutions comments in paragraphs 9.19 to 9.23 (inclusive) of the Preferred Options document.
The Council also agrees that Lancashire County Council’s and Lancashire Enterprise Partnership’s comments, made in relation to paragraphs 9.19 and 9.20, will be incorporated.

The Council considers there is a need to draft a separate policy on the Lancashire Enterprise Zone at BAE Systems, Warton, as a strategic location.

The Council will identify the boundary of the Enterprise Zone at BAE Systems, Warton on the new Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).

The Highways Agency comments are noted.

The Council agrees with the comments made by United Utilities and will make the necessary changes based upon their comments as outlined above.

Recommendations for change

- Add wording to paragraphs 9.19 – 9.23 of the Preferred Options ensuring that there is protection and safeguarding for ongoing and future operations related to the airfield at Warton Aerodrome.

- Amend the first sentence in paragraph 9.19 of the Preferred Options to read: “The Enterprise Zone at Warton was announced in the Chancellors Autumn 2011 Statement and came into effect on 1 April 2012”.

- In paragraph 9.20 of the Preferred Options: third line replace “British Aerospace” with “BAE Systems”.

- In paragraph 9.20 of the Preferred Options: delete the second sentence and replace with the following text: “The focus of the Enterprise Zone is the advanced engineering and manufacturing sector. The regional skills centre/academy is at Samlesbury”.

- Add an additional criterion to policy EC2 and the supporting text of the Preferred Options document, in accordance with the suggestions from United Utilities: i.e. “The Council will take account of the following factors when assessing all development proposals for employment uses:
  
h) the impact on foul and surface water drainage infrastructure especially the need to secure the most sustainable approach to surface water drainage.”

- Add a new policy on the Lancashire Enterprise Zone at BAE Systems, Warton.

- The boundary of the Lancashire Enterprise Zone at BAE Systems, Warton will be shown on the new Policies Map which will be prepared to accompany the Publication version of the Local Plan (Part 1).
Policy EC3: The Rural Economy

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Representations received from:
- Treales, Roseacre and Wharles Parish Council
- National Farmers Union
- Lancashire Wildlife Trust
- Highways Agency
- English Heritage
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Campaign to Protect Rural England (CPRE) – Fylde District
- 1 residential developer
- 1 Resident

What you said

A resident commented that Land West of Cropper Road could be developed for a variety of uses.

Treales, Roseacre and Wharles Parish Council proposed that the 4th paragraph of policy EC3 should be redrafted as follows:

‘The irreversible loss of the best and most versatile agricultural land outside settlement boundaries should be resisted. Development should only take place on such land after all brownfield or lesser quality land has been utilised to meet the Local Plan Vision.’

The National Farmers Union welcomed the promotion of development and diversification of agricultural and other land-based rural businesses. The NFU would not wish to see this as the only option for diversification.

Lancashire Wildlife Trust commented that criterion b) needs to consider the potential impact on European Protected Species (Bats and Barn Owls), which are often associated with such buildings.

The Highways Agency was generally supportive of providing employment opportunities within the rural areas, where it is of an appropriate scale. The Highways Agency support infrastructure improvements which contribute towards a reduction in the use of the private car.

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors commented that greenfield land should only be built on as a last resort and that a sustainable rural economy is vital – it provides jobs and leisure and recreational opportunities.

CPRE – Fylde District commented that policy EC3 should mention farming and agriculture, aim to minimise loss of any agricultural land and aim to avoid urban fringe developments creating unnecessary conflict with farming operations.

A residential developer commented that policy EC3 is more onerously worded and inconsistent with the NPPF. Paragraph 111 of the NPPF is clear that concern should only be raised if a proposal results in the loss of 'significant areas' of best and most versatile agricultural land.

English Heritage commented that the policy would benefit from reference to specific aspects of the historic environment that can be used to support the growth and expansion of the rural economy. The Plan should...
be expanded to include a description of the historic environment in rural areas and an assessment be made of its character and contribution it makes to the area as well as the Lancaster Canal, which runs through Fylde.

**Council response**

The comments relating to Land West of Cropper Road are listed in the table in appendix 2.

Comments in relation to brownfield (previously developed land) first are dealt with under policy GD1 in chapter 8.

The Council considers that there is a need to be aware of the strategic allocations and what grade best and most versatile agricultural land and ecological issues there are on the sites. The Council also considers it necessary to develop a pro-forma for each site – i.e. a Portfolio of Sites - which sets out this information. There is a need to justify why the Council is allocating sites even if best and most versatile agricultural land; it could be the case that there is an overriding need to develop in a sustainable location. However, best and most versatile agricultural land is not going to be presented on the new Policies Map. Best and most versatile is very broad brush, and it is not subdivided into 3a / 3b. Natural England is responsible for designating land as best and most versatile agricultural land. If Natural England publish a map of best and most versatile agricultural land, then the Council could refer to it in policy EC3 or its supporting text.

The comments made by the National Farmers Union and the Highways Agency are noted. Any potential impact on European Protected Species is considered in determining a planning application for conversion of agricultural buildings. The Council considers it necessary to separate landscape and nature conservation issues; to retain landscape issues in policy ENV1 and to draft a new policy on biodiversity in chapter 14 which will set out the hierarchy of nature conservation designations and go on to cover species protection, habitat protection and enhancement.

The context to policy EC3 at paragraph 9.31 makes reference to the importance of agriculture. Policy ENV6 (c) in chapter 14 of the Preferred Options document deals with the impact upon surrounding land-uses. The need to read the plan as a whole is set out in chapter 1 (see the recommended new paragraph in chapter 1).

Paragraph 112 in the NPPF refers to the economic and other benefits of the best and most versatile agricultural land. It goes on to say that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The NPPF does not say concern should only be raised if a proposal results in the loss of 'significant areas' of best and most versatile agricultural land, as suggested by a residential developer.

The comments raised by English Heritage relating to the historic environment and leisure assets, including Lancaster Canal, are dealt with under the re-drafted policy ENV5 of the Preferred Options document and the related supporting text in chapter 14.

**Recommendations for change**

- None
Policy EC4: Maintaining Vibrant Town and Local Centres

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Representations received from:
- Councillor Eastham
- Blackpool Council
- Wyre Borough Council
- BAE Systems Real Estate Solutions
- English Heritage
- Highways Agency
- 3 Planning Agents
- 42 Residents

What you said

Numerous residents suggested deleting Warton from the District Centre category. Warton is not a service centre like Ansdell and Freckleton. People go to Freckleton for shopping, the post office, the library, medical centre, financial advice, etc. People do not travel to Warton for any of these facilities, nor for anything else. Residents claimed that Warton is neither a service centre, nor a district centre and never will be, as it is in the wrong position. Residents claimed that this categorisation is a feeble and misplaced attempt to justify substantial development in the fields around Warton.

One resident commented that it is a mistake to allow the NPPF to guide town centre growth as it is very general.

Several residents supported the Council’s confirmation at paragraph 9.63 that the NPPF threshold of 2,500 square metres will apply in terms of assessing retail impact.

A retail developer supported the aim to locate town centre uses within existing town centres; and the flexible approach within the policy towards the consideration of town centre uses in edge-of-centre or out-of-centre locations.

Several residents also commented that the Fylde Coast Retail Study, as the title indicates, is a high level, sub-regional, strategic retail study and is not particularly well adapted in terms of looking at the precise needs of Warton (and Freckleton given its proximity). The existing and planned population growth for Warton would provide more than sufficient expenditure to justify a 10,000 square feet net foodstore similar to an Aldi, Lidl or converted (Netto) ASDA type format store. As such, it would not be unreasonable to conclude that there is also a good qualitative needs case to improve the retail provision in Warton.

BAE Systems Real Estate Solutions suggested renaming the section ‘Maintaining and Creating Vibrant Town and Local Centres’.

BAE Systems Real Estate Solutions sought clarification on the following: Does the 2011 Study include the demand generated from the Strategic Development Sites and express that in a requirement for both convenience and comparison goods floorspace? This would be useful to understand in terms of the land required for the District Centre for Warton.

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20 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
BAE Systems Real Estate Solutions supported the principle of preparing a Masterplan for Warton. They suggested that the Part 1 document should identify a broad location for the District Centre in Warton and include the following wording:

‘The broad location of the District Centre for Warton is identified on the Inset Map. The District Centre will include retail, community and associated town centre uses for residents, visitors and those working within the settlement. Land will be identified for the District Centre to meet the current and future needs for retail and associated services. This will be identified in the Local Plan Part 2: Site Allocations to 2030.’

Councillor Eastham made the following comments:

- Paragraph 9.53 should clearly set out the ‘existing’ gross retail floor-space in Fylde, as well as the projected growth in retail floor-space at the end of the Plan period.
- Paragraph 9.57 - The “identified existing floor-space capacity” of Lytham should be clearly identified in this paragraph.
- Policy EC4 should be reworded to say that “retail development will be supported ‘where appropriate’ within the town centres”.
- Paragraph 9.70 - If the Council has no definite plans to produce Town Centre Management Plans this should be reflected in the plan.

Blackpool Council supported the retail approach in line with the Fylde Coast Retail Study.

Wyre Borough Council referenced having due regard to the findings of the updated retail study. It will be important that the Local Plan follows the ‘town centres first’ principles set out in the NPPF.

English Heritage commented that the Plan should be expanded to include a description of the conservation areas and historic retail environments in Fylde and an assessment made of their character and the contribution it makes to the area. English Heritage recommended that the Council should be undertaking Conservation Area Appraisals to inform the Plan.

The Highways Agency is supportive of providing an adequate range of accessible facilities and services in sustainable locations, which can help to reduce the need to travel. The Highways Agency supported the sequential approach adopted within this policy and focussing new town centres uses towards the existing town centres of St Annes, Lytham and Kirkham, whilst ensuring any retail development will be appropriate in scale, role and function.

The Highways Agency welcomed the recognition that other uses in town and local centres should not have an unacceptable impact on the level of traffic generation and new office developments within these areas should be accessible by public transport to reduce the need to travel by private car.

**Council response**

In considering the status afforded to Warton, attention is drawn to paragraph 7.49 in chapter 7 of the Preferred Options document: “it is anticipated that development at Warton will provide for increased shops, improved local facilities, and better access to the centre and that this will assist in providing Warton with an improved local centre, and enhanced sustainability as set out in the Vision.”

The comments relating to assessing retail impact are noted. The Council will, however, consider preparing a locally set threshold.

In response to BAE Systems Real Estate Solutions comments, the Council will delete “Maintaining” from the sub-title of paragraph 9.49 context to address both maintaining and creating centres.

Both the 2011 Retail Study and the 2014 Update include the following key data inputs:
• population forecasts;
• per capita expenditure data;
• expenditure growth rates;
• special forms of trading (such as online shopping);
• turnover efficiency gain in existing retailers;
• retail planning commitments; and
• consideration of over-trading in the convenience sector.

What they do not do is specifically provide demand generated from the Strategic Development Sites. Outside of the 3 defined town centres it sets out floor-space requirements collectively for Remaining District and Local Centres.

The Local Plan (Part 2) document will identify a broad location for the Village Centre in Warton. The Bryning and Warton Neighbourhood Plan will include a masterplan for Warton Strategic Location and this will identify a specific location. The masterplan is covered in more detail in policy SL3 in chapter 7.

The Council is unable to amend policy EC4 to say that ‘retail development will be supported ‘where appropriate’ within the town centres as this is not compliant with NPPF. The 6th bullet point in paragraph 23 of the NPPF says “It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites”.

The Plan will be amended to reflect Cllr Eastham’s comments in relation to paragraphs 9.53, 9.57 and policy EC4 of the Preferred Options document. The existing floor-space capacity of St Annes and Kirkham will also be identified in the supporting text. The Council’s Economic Development Strategy (page 51 – 7th bullet point) makes a clear and definite commitment to the preparation of Town Centre Management Plans (referred to in paragraph 9.70), which will be reflected in amended wording in the Local Plan.

The Council agrees to add a reference in policy EC4 of the Preferred Options document to a 750 square metre threshold on retail floor-space and to add a new key indicator to monitor retail floorspace in Appendix 5: Performance Monitoring Framework.

Blackpool Council’s, Wyre Borough Council’s and the Highways Agency’s comments are noted.

The comments made by English Heritage relating to the historic environment and leisure assets, including Lancaster Canal are dealt with in the re-drafted policy ENV5 and supporting text in chapter 14.

The title of policy EC4 in the Preferred Options document and the sub-headings prior to the policy and paragraph 9.49 will be amended to ‘Vibrant Town, District and Local Centres’, not ‘Maintaining Vibrant Town and Local Centres’.

The Council considers it necessary to add text to policy EC4 of the Preferred Options document to clarify that Part 1 of the Local Plan will set out which town, district and local centres. Part 2 will review town, district and local centre boundaries; review primary and secondary frontages; and define the primary and secondary shopping area(s).

Recommendations for change

• Delete: “Maintaining” from the title of policy EC4 and from the sub-heading prior to paragraph 9.49 and add the word “District” after “Town” in the title. The text should read: “Vibrant Town, District and Local Centres”.

• Amend policy EC4 to clarify that Part 1 of the Local Plan will set out which are the town, district and local centres. Part 2 will review town, district and local centre...
boundaries; review primary and secondary frontages; and define the primary and secondary shopping area(s).

- Amend the Retail Hierarchy of Centres in policy EC4 to read: “1. Town Centres; 2. District / Village Centres; 3. Local Centres”

- Add a reference in policy EC4 to a 750 square metre threshold of retail floor-space and add a new key indicator to monitor retail floorspace in Appendix 5: Performance Monitoring Framework.

- In paragraph 9.53 of the Preferred Options document, set out the 'existing' gross retail floor-space and the projected growth in retail floor-space.

- In paragraph 9.56 of the Preferred Options document, identify the existing floor-space capacity of Kirkham.

- In paragraph 9.57 of the Preferred Options document, identify the existing floor-space capacity of Lytham.

- In paragraph 9.58 of the Preferred Options document, identify the existing floor-space capacity of St Annes.

- Amend paragraph 9.70 of the Preferred Options document to read: “Before adoption of the Local Plan Part 2: Site Allocations to 2030, the Council will put in place Management Plans for the town centres, which will address the function and accessibility of each centre and include all planned and envisaged public realm schemes for each of the areas”.

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**Leisure, Culture and Tourism General Comments:**

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Representations received from:
- BAE Systems Real Estate Solutions

**What you said**

BAE Systems Real Estate Solutions supports the proposal for the Coastal Parkway and would wish to be involved in the preparation of the Masterplan. BAE Systems Real Estate Solutions wish to ensure that proposals for the Coastal Parkway align with the operational requirements of the Aerodrome and the respective aviation authorities.

**Council response**

BAE Systems Real Estate Solutions comments are noted.
Recommendations for change

- None

Policy EC5: Leisure, Culture and Tourism Development

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Representations received from:
- Lancashire Wildlife Trust
- English Heritage
- Sport England
- The Theatres Trust
- Highways Agency
- Pendle Production Ltd

What you said

Pendle Production Ltd commented that culture attracts investment and it is only right that some of that investment should be used to propagate more cultural activity. Developers should be encouraged to put finance towards the cultural activities that will attract people to their developments.

Lancashire Wildlife Trust noted that there is no mention of the natural environment in this section, which seems at odds with the internationally important designations that apply to the coast (Ribble and Alt Estuaries Special Protection Area / Ramsar site), the Site of Special Scientific Interest / Local Nature Reserve / Biological Heritage Site dune system and the stated wish to promote the Ribble Coast and Wetlands Regional Park initiative and the Coastal Parkway Masterplan.

English Heritage welcomed the proposal to promote the classic resort initiative for St Annes. This concept needs to be defined within the Plan. English Heritage welcomed the proposal to regenerate the seafronts of Lytham and St Annes, but noted that there is no mention or assessment of the prominent historic environment in this proposal. The importance of the historic environment should be a key objective in this section as it is an important part of the local economy. Reference needs to be made to the Lancaster Canal, which runs through Fylde.

Sport England welcomed the reference in policy EC5 to sports facilities (leisure centres, swimming pools, golf courses). However, in accordance with paragraph 73 of NPPF, any policies relating to sports provision must be based on a robust and up-to-date needs assessment. For that reason, Sport England strongly advised including an additional policy(ies) for indoor and outdoor sport and linking policy EC5 of the Preferred Options document to that new policy in chapter 11.

The Theatres Trust is pleased to see that policy EC5 will protect existing cultural assets and will encourage daytime and evening leisure and cultural facilities in town centres.

The Highways Agency is generally supportive of locating leisure, cultural and tourism accommodation, in St Annes and Lytham, where their scale and cumulative impact is appropriate to the location. The Highways Agency would like to see consideration given to ensuring destinations are accessible by sustainable modes of transport.
Council response

The comments made by Pendle Production Ltd, the Theatres Trust and the Highways Agency are noted.

In response to the comments made by Lancashire Wildlife Trust, the Council agrees to make reference in chapter 1 to the fact that the Local Plan should be read as a whole.

The Council agrees to include additional criteria in policy EC5 of the Preferred Options document which refers to environmental designations; the Ribble Coast and Wetlands Regional Park and the Coastal Parkway Masterplan.

The comments made by English Heritage relating to heritage assets, including Lancaster Canal, are dealt with under policy ENV5 of the Preferred Options document and the related supporting text in chapter 14.

In response to English Heritage’s comments about the role of the historic environment in regenerating the seafronts of both Lytham and St Annes, the Council agrees to refer to the protection of heritage assets in the form of seaside resort facilities, in policy EC5 of the Preferred Options document.

The comments made by Sport England are noted. The Council agrees with Sport England over the need for an additional policy for indoor and outdoor sport in chapter 11 (Health and Wellbeing) and to link policy EC5 of the Preferred Options document to the new policy.

Recommendations for change

- Amend criterion b) of policy EC5 of the Preferred Options document to read: “Supporting the physical regeneration of Lytham and St Annes seafront area and the protection of seaside resort facilities, to maintain the hotel market and support wider tourism and the local economy”.

- Amend criterion (e) of policy EC5 of the Preferred Options document to: “Protecting existing tourism, cultural, heritage and leisure assets, such as golf courses and the seaside resort facilities, with a view to helping them to adapt to new challenges.”

- Add a new criterion h) to policy EC5 of the Preferred Options document which says: “Protecting the environmental designations (i.e. the Ribble and Alt Estuaries Special Protection Area / Ramsar site, and the Site of Special Scientific Interest / National Nature Reserve / Local Nature Reserve / Biological Heritage Site dune system) in accordance with policy ENV2”.

- Add a new criterion i) to policy EC5 of the Preferred Options document which reads: “Promoting the Ribble Coast and Wetlands Regional Park initiative and the Coastal Parkway Masterplan”.

- Add a new policy on indoor and outdoor sports facilities in chapter 11, and link policy EC5 of the Preferred Options document to the new policy.
Policy EC6: Leisure, Culture and Tourism Accommodation

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Representations received from:
- English Heritage
- Environment Agency
- Highways Agency
- 1 Resident

What you said

A resident commented that policy EC6 is too weak in protecting existing holiday areas. Primary and secondary holiday area(s) should be maintained. The resident claimed that the enhancement of the night time economy could have both positive and negative effects on crime.

English Heritage welcomed the proposal to promote the classic resort initiative for St Annes. This concept needs to be defined within the Plan. English Heritage welcomed the proposal to regenerate the seafront of Lytham and St Annes, but noted there was no mention or assessment of the prominent historic environment in this proposal. The importance of the historic environment should be a key objective in this section as it is an important part of the local economy. Reference needs to be made to the Lancaster Canal, which runs through Fylde.

The Environment Agency supported avoiding the change of use of holiday sites to permanent residential use.

The Highways Agency was generally supportive of locating leisure, cultural and tourism accommodation in St Annes and Ribby Hall Village, where their scale and cumulative impact is appropriate to the location. The Highways Agency would like to see consideration given to ensuring destinations are accessible by sustainable modes of transport.

Council response

The Environment Agency’s and the Highways Agency’s comments are noted.

Primary holiday areas are to be maintained in the Plan. Secondary holiday areas have not been maintained as the NPPF includes hotels within the definition of ‘main town centre uses’, which are subject to a sequential test.

The comments made by English Heritage relating to Lancaster Canal are dealt with under the re-drafted policy ENV5 of the Preferred Options. The concept of the classic resort is set out under the re-drafted policy ENV5 of the Preferred Options document, together with a definition in the glossary.

In response to English Heritage’s comments about the role of the historic environment in regenerating the seafront of both Lytham and St Annes, the Council agrees to refer to the protection of heritage assets in policy EC5 (b and e) of the Preferred Options document.
Recommendations for change

- None
Chapter 10 Housing

Chapter 10 Housing General Comments:

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Representations received from:

- Highways Agency
- Campaign to Protect Rural England (CPRE) – Fylde District
- English Heritage
- BAE Systems Real Estate Solutions
- Ribby with Wrea Parish Council
- Councillor Eastham

What you said

Ribby with Wrea Parish Council commented that the Strategic Housing Land Availability Assessment (SHLAA) site maps which indicate assessed / possible development sites give the wrong impression to developers and only encourage unwanted planning applications; and it was recommended that they be removed from the final document as they are not necessary.

The Highways Agency considered that the Plan lacked a policy detailing the overall provision of housing (akin to policy EC1 for employment). Whilst it is appreciated that the majority of housing development will be directed towards the strategic locations, the Highways Agency would expect a housing policy which details the total provision across the authority and the intentions for phasing. The detail is provided in Appendix 3, however it was considered that it should be included as a policy intention to give greater certainty to the housing delivery strategy.

BAE Systems Real Estate Solutions commented that Section 10.2 should make reference to the Council’s brownfield first policy as identified in Section 4.7 Objective 1: To create sustainable communities.

CPRE – Fylde District commented that a Fylde Borough Council Empty Homes Strategy should define a target number of empty homes per year to be brought back into use. This figure should be assumed to contribute to the annual housing supply.

English Heritage objected to paragraphs 10.13 and 10.14 because no assessment had been made of the historic environment or the different character areas in the Borough in Plan. English Heritage claimed that the Plan needed to be expanded to explicitly detail the heritage assets and historic environment in the Borough and make an assessment of their contribution to the area.

Cllr Eastham recommended that paragraph 10.34 – relating to Lifetime Homes and Community Self Build should be deleted as requiring 25% of all homes to meet lifetime homes standards is too onerous.

²¹ Some respondents have submitted more than one representation for this section, therefore the number of representations does not match the number of respondents.
Council response

The maps showing land at strategic sites listed in policies SL1, SL2, SL3 and SL4 (inclusive) in chapter 7 do need to be included because, as set out in paragraphs 21 and 47 of the NPPF, a Local Plan must identify key sites which are critical to the delivery of local and inward investment and the housing strategy over the plan period.

The detail of when and where housing and economic development will be delivered is set out in policies SL1, SL2, SL3 and SL4 of chapter 7: Strategic Locations for Development.

Objective 1 in chapter 4 is not a policy and it does not state that brownfield land should be used first. It does refer to making the best use of brownfield land to reduce the loss of greenfield land.

Paragraph 51 of the NPPF says that Local Planning Authorities should identify and bring back into residential use empty housing and buildings in line with empty homes strategies. However, it does not go as far as saying that they should make a contribution to supply. The Council has an Empty Homes Strategy however, it does not contain a target for bringing Empty Homes back into use which could then be offset against new build completions. The resources are not available for the Council to be more proactive in bringing Empty Homes back into use.

Paragraphs 10.13 and 10.14 are not intended to be about the heritage of the area, but simply provide background information describing variety in the current stock and how the population is changing. The two paragraphs constitute background information in relation to the types of new housing that may be needed. More up-to-date evidence on the variety of house types and tenures and changes in the population is presented in the Fylde Coast Strategic Housing Market Assessment 2014 (SHMA), which provides evidence of what types of new homes are needed.

In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be done. The Heritage Strategy sets out a strategic framework for future heritage works streams, including a statement of intent to undertake conservation area appraisals and management plans where relevant.

The requirement to build 25% of all homes to Lifetime Homes standards will be revisited as part of the viability testing of the plan. If the requirement is found to make development unviable and therefore undeliverable it will be deleted from the plan. In addition, the DCLG’s review of Housing Standards and the results of the consultation which took place nationally in summer 2013, may result in the removal of Lifetime Homes standards.

Recommendations for change

- There may be changes to requirements for Lifetime Homes as a result of viability testing. Lifetime Homes standards may be removed nationally as part of the ongoing review of Housing Standards, implemented by the Department for Communities and Local Government (DCLG). If this is the case, all references to Lifetime Homes should be removed from the Plan.
Policy H1 Density, Mix and Design of New Residential Development

Number of representations:

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Representations received from:

- English Heritage
- Highways Agency
- United Utilities
- Sport England
- Lancashire Wildlife Trust
- BAE Systems Real Estate Solutions
- Treales, Roseacre and Wharles Parish Council
- Blackpool Council
- Councillor Eastham
- 6 Residential Developers

What you said

A developer commended the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population, particularly within policy H1 and the accompanying justification to this policy in the Preferred Options document.

A developer objected to policy H1 of the Plan considering it to be unsound, claiming that it had not been positively prepared or justified with up-to-date or relevant evidence.

Density

A developer supported Fylde’s approach to density, it is a sensible approach for a development to be reflective of its surroundings, and is consistent with the 5th bullet point of paragraph 47 of the NPPF. However, the developer considered that the Council needs to clarify what is considered to be ‘good access’ to public facilities and services, as there is no definition when setting a density requirement of 40-60 dwellings in these areas. The developer claims that this policy should be supported by a detailed viability assessment.

The Highways Agency supported the promotion of high density residential development at a minimum of 25 dwellings per hectare, especially within close proximity to existing centres, key transport nodes and facilities, as this will facilitate a reduction in the need to travel, particularly by private car. The Highways Agency welcomed the recognition that where higher densities of 40-60 dwellings per hectare are proposed, the Council will seek to ensure there will be no unacceptable impact on the local transport infrastructure.

Policy H1 of the Preferred Options document expects higher densities (40-60 dwellings per hectare net or more) on sites with good access to public transport facilities and services, for clarity Blackpool Council asked whether this includes all strategic sites.

Sport England assumed that the use of the words ‘open space’ is a generic term that includes outdoor sport. If that is the case, then Sport England suggested rewording the third paragraph of policy H1 to say: “and that appropriate open space, sport and recreation provision can be provided in accordance with the findings of any adopted needs assessment.”
A developer objected, claiming that the Local Plan fails to provide a justifiable reason within the background text why these densities have been chosen. A developer recommended that this part of policy H1 be amended with a realistic density.

A developer commented that policy H1 identifies a minimum density of 25 dwellings per hectare, with higher densities (40-60 dwellings per hectare) required in areas with good public transport. The NPPF permits the Council to set out its approach to housing density to reflect local circumstances, but this should be based upon credible evidence. Such a policy is thought likely to create conflicts with policy ENV6 criterion e) (i.e. the design policy in chapter 14 of the Preferred Options document), which requires densities to reflect the character of the surrounding area. A more flexible approach to density would be to ensure that the characteristics of individual sites are taken into account. The developer claimed that the 2008 SHMA is out-of-date.

Mix
A developer also requested that the phrasing in policy H1 referring to housing mix should be reworded to “a broad mix of dwelling types, sizes and tenures, including private rented and buy-to-let, will be appropriate on all large housing sites over 100 units” to reflect the demographics of the Borough as set out in the Fylde Coast SHMA, to ensure that developments continue to be viable to reflect the uncertainty of the market as the requirements in the SHMA may not always be attainable due to viability. BAE Systems Real Estate Solutions and a developer made a similar comment that the Local Plan policy does not need to be overly specific in this regard as long as a broad mix is provided as ultimately the market will decide what type of units are needed in a particular area. The developer also claimed that the SHMA was out-of-date.

Design
A developer commented that all homes should be built to Building Regulation Standards and not Lifetime Homes. This is in line with the NPPF (paragraph 96) which says that “any local building standards should adopt nationally described standards”. Lifetime Homes create properties that are only partially suitable at different stages of need, not properties that are wholly suitable now, this creates issues of under-occupancy. The impact of this requirement on density has not been considered. The developer suggested that provision should be made for sustainable communities where people can create families and communities.

A developer wanted it noting that the extent to which these requirements will be viable when examining all other developer contributions, affordable housing requirements and emerging Community Infrastructure Levy costs will need to be fully explored and set out by the Council when progressing the Local Plan and Community Infrastructure Levy charging schedules.

United Utilities encouraged the Council to promote improvements in water efficiency through the design of all development which will reduce pressure on the supply of water and reduce the impact on wastewater infrastructure, resulting in more sustainable development and assisting in improving bathing waters. All new homes will be expected to achieve the water efficiency target set out within Level 3 of the Code for Sustainable Homes. United Utilities also requested that an additional paragraph be included in the justification to policy H1 of the Preferred Options document.

Treasles Roseacre and Wharles Parish Council suggested that to retain the character of rural areas, that the design of development in rural areas should incorporate outer boundaries composed of native hedging.

Lancashire Wildlife Trust commented that there is no mention of the ecology of the existing site or the need to enhance biodiversity as a result of any development. This is especially important given that most of the Strategic Locations identified for housing development contain ponds or adjoin Biological Heritage Sites (Site of Special Scientific Interest / Local Nature Reserve in the case of policy H5 – Isolated New Homes in the Countryside).

English Heritage commented that the NPPF requires that plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. No assessment has been made in the Plan.
of the historic environment, it is a requirement of the NPPF that a proper assessment of the significance of heritage issues has been made.

Provision for All Ages

Cllr Eastham commented that reference to Community Self Build should be deleted from policy H1, and a developer suggested that the Council should not reserve the right to request contributions from community self-build schemes.

Council response

The Council will continue to take a positive approach to meeting the needs of its ageing population in particular by taking account of the evidence contained in the Fylde Coast Strategic Housing Market Assessment 2014 (SHMA). With respect to the relationship between density and accessibility, page 221 of the Preferred Options document sets out an Accessibility Questionnaire and higher densities will be expected on sites with a high accessibility rating. It is agreed that this should be explained more clearly in the policy.

On the strategic sites a density of 30 dwellings per hectare was used on 60% of the site area. However, the initial findings of the Viability Study are that these densities are too low and this is having a negative impact on Viability. It was not intended that the highest densities would apply to the strategic sites as although every effort will be made to improve their accessibility by public transport most of them are some distance from railway stations. Also they are all visible from surrounding countryside which is flat or gently undulating in character. Existing higher density development on the edge of Lytham and St Annes (Cypress Point) is highly visible from the surrounding countryside and may be inappropriate on the strategic sites. Densities on the strategic sites will be revisited using the new evidence of need for different types of dwellings (SHMA 2014) and the viabilities of different densities (Viability Study 2014). Densities will be adjusted to make sure that the Local Plan is deliverable, whilst protecting the landscape character of the countryside which surrounds the strategic sites.

Policy H1 of the Preferred Options document does not conflict with policy ENV6 on design, as ensuring densities of new residential development reflect the character of the surrounding area does mean the characteristics of individual sites would be taken into account.

The Council agrees with the suggested wording, proposed by Sport England, on sport and recreation provision in policy H1 of the Preferred Options document.

With respect to mix, there is a growing and evidenced need for housing for the elderly. The SHMA 2014, Wrea Green Housing Need Study and wider Rural Housing Needs Study all evidence this need. Fylde has a very small stock of small bungalows for the elderly to downsize to, more of this type of accommodation will be needed. The policy will be amended to reflect these needs and the viability of these requirements will be assessed.

The results of the Viability Assessment will be used to revisit the requirements in the design part of policy H1, of the Preferred Options document, and will be used to decide which requirements should remain in the policy.

The Government has amended the primary legislation to allow for water efficiency measures to be part of building regulations. Although, it has not happened yet, it is imminent. The ten point action plan for improving bathing waters asks for Code Level 3 for water efficiency. This Council is being asked to sign up to this now. The Council will continue to monitor this and will only include it in the Local Plan if it is not included in the Building Regulations.

The NPPF contains detailed information on design and the Council was strongly advised at the time of drafting the Preferred Options document not to repeat it in the Local Plan. In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the
evidence base for the Local Plan against which applications for new housing can be assessed. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be done.

Comments in relation to nature conservation (biodiversity) considerations and new development are dealt with in chapter 14. Comments in relation to the historic environment are dealt with under the re-drafted policy ENV5, in chapter 14 of the Preferred Options document.

The Government is promoting Community Self Build as a way of helping people to build their own homes. These schemes should not be made unviable by the Council requesting developer contributions.

### Recommendations for change

- Policy H1 of the Preferred Options document will be amended as a result of the SHMA 2014 and the Viability Assessment 2014.
- Policy H1 of the Preferred Options document will be amended to specify the relationship between the accessibility score and density.
- Amend the third paragraph of policy H1 of the Preferred Options document to say: “... and that appropriate open space, sport and recreation provision will be provided in accordance with the findings of any adopted needs assessment and car parking will be provided.”

### Policy H2: Conversions and Changes of Use to Residential

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Representations received from:

- Highways Agency
- A Developer

**What you said**

The Highways Agency commented that the conversion of a site from employment purposes to housing, would bring with it different patterns of travel, that could have differing implications, including at the strategic road network. Such considerations would need to be fully considered including with reference to any influence such as at the strategic highway network.

A developer objected to the restriction of residential conversion of redundant buildings to only where there is an identified need for additional housing. The NPPF clearly promotes sustainable development and bringing vacant and under-used buildings back into productive use, there is therefore no justification to
identify a housing need as a pre-requisite. The developer claimed that if the Council are concerned about the specific loss of employment premises, then this should be dealt with by way of an employment policy and not a general restriction on the conversion of redundant buildings.

**Council response**

The Council is in continuing dialogue with the Highways Agency in relation to the Infrastructure Delivery Plan. Paragraph 51 of the NPPF refers to conversions and does not mention the strategic road network. Paragraph 32 final bullet in the NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The NPPF takes a more permissive approach to development than previous guidance.

The Council considers there should be a new policy on highways impact and design in the General Development chapter (chapter 8).

Paragraph 51 of the NPPF says ‘They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate’.

**Recommendations for change**

- Add a new policy (i.e. policy GD6) to chapter 8 on highways impact and design.

**Policy H3 Affordable Housing**

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Representations received from:

- Kirkham Town Council
- Ribby with Wrea Parish Council
- Kirkham Grammar School
- Blackpool, Fylde and Wyre Trades Union Council
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- The Minority Group Report
- 5 Residential Developers
- 199 Residents

**What you said**

*Percentage of Affordable Housing*

Kirkham Grammar School commented that in the case of residential development of the grammar school off-site playing fields, the existing playing field will need to be replaced to meet the requirements of the

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²² Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
NPPF and the relevant emerging Local Plan policy (policy ENV2 in chapter 14). This may affect the viability of the Kirkham Grammar School site as a housing development with 30% affordable housing. Kirkham Grammar School suggested that this should be explored at the appropriate time.

Blackpool, Fylde and Wyre Trades Union Council welcomed new homes being made available for people, however, enough social housing should be included in the plan to take account of local need and the quite dramatic drop in the proportion of owner occupiers over recent years.

A developer believed that the affordable housing policy as currently structured is sound given the flexibility provided by the mechanism to permit viability testing enabling a development to still be permissible if it can be demonstrated that the level of affordable housing required cannot be met at risk of the site's delivery.

Three developers commented that there is a lack of justification for the requirement for 30% affordable housing; that the Council is relying on out-of-date evidence and there has been no Viability Testing.

A resident objected because the figures for affordable housing had not been fully defined and there is widespread concern that the figures will only be disclosed just before the Local Plan goes to the Secretary of State for approval, therefore without consultation. The resident claimed that this was devious and undemocratic.

Distribution of Affordable Housing
Ribby with Wrea Parish Council commented that affordable housing should not be forced on rural areas where there is not a quantifiable local need. As such, housing development should not be approved merely to fund affordable housing elsewhere and all towns and villages must accept their fair share as assessed by local need.

Fylde Liberal Democrats would like to see affordable housing provided in the same settlement as any proposed housing development. Developers should not be able to create a situation where they are built elsewhere creating affluent/less affluent enclaves within the borough.

The Minority Group Report suggested the provision of affordable housing should be to meet the need of the settlements and not the whole borough. The Group objected to the provision of affordable housing in Kirkham, Wesham and Warton.

Numerous residents commented that the second paragraph of policy H3, ‘Affordable Housing’ in the Preferred Options document, should be altered to read “the provision of affordable housing will be to meet the need / requirement identified for those settlements”. The existing wording says that affordable housing will be located in Kirkham, Wesham, Freckleton, Lytham and St. Annes, as there is no housing allocated in Freckleton and developers in Lytham and St. Annes attempt not to build social housing within their developments and instead give cash equivalents to provide social housing elsewhere in the Borough. Residents consider that Kirkham and Wesham will take greater numbers of this type of housing, which they claim is poor planning and will affect the balance of housing provision within communities. Numerous residents made a very similar comment except that they said that Warton will have to take greater numbers of this type of housing.

Another group of residents requested that the second paragraph of policy H3 be deleted and commented that it is not acceptable to distribute affordable housing to Warton and Freckleton to meet the affordable housing needs of Lytham and St Annes, Blackpool and Kirkham. The residents claimed the most urgent need being for affordable housing to be located in mixed developments in those large urban areas. There is a need for more affordable family housing particularly in Lytham and St Annes (source: Fylde Local Plan to 2030: Part 1 Preferred Options Local Plan Strategic Environmental Assessment and Sustainability Appraisal pp19). Residents claimed that policy SL4 in chapter 7 does not address this need, but policy SL1 could.
A developer commented that given the size and potential of Little Singleton, it should be included in the third paragraph of policy H3 as it has the potential for residential development which will then assist with meeting the affordable housing requirement of the settlement.

A developer objected to policy H3 and recommended that the third paragraph be open to interpretation; they recommended that the requirements are clearly stated and justified for each of the settlements within the policy or that part of the policy is deleted.

**Further Expectations**

A developer supported the recognition by the council that the requirements for tenure, size and type of affordable housing should be negotiated on a case by case basis taking account of viability and local need. However, two developers commented that the inclusion of expectations on size of social rented properties and the amount of Lifetime Homes is overly prescriptive and should be deleted.

A developer commented that the requirement for 30% affordable homes and tenure, alongside 25% Lifetime Homes Standards will need to be assessed as part of the Council's CIL Charging Schedule.

**Council response**

The SHMA 2014 concludes there is a net annual affordable housing need of 207 dwellings. The requirement for 30% affordable housing on developments of 15 homes or more has been Viability tested.

There is a need for affordable housing throughout Fylde Borough. Need is higher in the urban areas e.g. Lytham and St Annes but there is need for affordable housing in Kirkham and Wesham and Freckleton and Warton as well as on the Fylde-Blackpool Periphery. The plan includes all of the land that can be allocated at Lytham and St Annes so it will maximise the amount that can be provided there and the rest will need to be provided at the strategic sites adjacent to the other settlements. The Council's duty is to meet the needs of its residents on a borough wide basis. Kirkham and Wesham and Freckleton and Warton are second tier settlements (local service centres), they are built up urban areas and are readily distinguishable from the rural villages. The market housing and affordable housing needs of the Borough will be addressed by all of the urban areas. Land allocated on the edge of these settlements will be included within settlement boundaries once allocated and is not rural.

Section 106 Agreements are drawn up to ensure the money is usually spent on providing affordable housing in that settlement. The amount of affordable housing provided will continue to be assessed on a site by site basis with the Viability of the development being the determining factor. For example, a lower proportion of affordable homes has been agreed on the GEC Marconi site at Warton because of the high cost of remediating contaminated land. If a lower proportion had not been agreed, development of the site would not have gone ahead, it is important to deliver brownfield sites in order to reduce the amount of greenfield allocations included in the plan. At Richmond Avenue in Wrea Green, 8 affordable units were provided because the Wrea Green Housing Need Study had concluded that only 8 were needed in Wrea Green. The commuted sum went into a pot to be spent anywhere in the Borough. It is important that this money is collected and spent on affordable housing as there is a high need borough wide. The Blue Anchor development at Greenhalgh did not provide any affordable housing or commuted sum as it was demonstrated that this would make the development unviable. Applications will continue to be assessed on a site-by-site basis, affordable housing will continue to be provided where it is viable and if needed, at that settlement.

All of the strategic sites e.g. those listed in policies SL1 to SL4, inclusive, in chapter 7 are needed to meet the requirement for new homes.

Little Singleton is not included in the third paragraph of policy H3. The reference to Singleton does not mean Little Singleton.
The council is working on a programme of Rural Housing Need Assessments. Wrea Green and Singleton have been finished, the rest of the Borough apart from Lytham and St Annes is about to be written up and published in the Rural Housing Needs Survey 2014.

Emerging evidence from the SHMA 2014 and the Viability Study will be used to amend policy H3.

Recommendations for change

- New evidence from the SHMA 2014 and the Viability Study will be used to amend policy H3 of the Preferred Options document.

Policy H4 Gypsies, Travellers and Travelling Showpeople’s Sites

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Representations received from:

- Wyre Council
- Blackpool Council
- National Farmers Union
- The Traveller Movement
- A Planning Consultant
- 3 Residents

What you said

*General Comments*

Wyre Borough Council commented that the Local Plan’s approach to travellers with a criteria based policy in Part 1 and Site Allocations in Part 2 is in line with the approach proposed by Wyre.

The Traveller Movement requested that the ethnic identity of Gypsies and Travellers should be respected, and the words always referred to with an initial capital letter.

The National Farmers Union would hope to see that there is provision of adequate land for the associated livestock so as not to cause a negative impact on the local community with issues of fly grazing.

Two residents objected to the inclusion of any wording with respect to Gypsy and Traveller sites in the Local Plan.

A resident requested that residents adjacent to proposed Gypsy and Traveller sites are given as much notice as possible so that they can sell their homes.

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23 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
Policy H4

Blackpool Council supported policy H4 as it will allow for the assessment of proposals that come forward for unexpected need, however it is not clear from the policy whether the proposed criteria will also be used to guide land supply allocations as part of the proposed site allocations document if a need is identified as part of an updated GTAA. They suggested that the policy could clarify if policy H4 will be applied to guide land supply allocations (where appropriate), as set out in ‘Planning Policy for Traveller sites’, in addition to determining planning applications for new sites and extensions to existing sites.

The Traveller Movement also commented on the criteria in policy H4: claiming that criterion e) may be too restrictive given high land costs in or adjacent to settlements, and the preference of many Gypsies and Travellers to be a little away from other development. The Traveller Movement suggested amending the initial section to: “The site would be within or accessible to…”

Criterion f) the 2005 Good practice guide is what it says, and will not be appropriate to all circumstances. The issue of location and design is addressed by criterion d) and the first half of criterion f) is unnecessary.

Criterion h) implies that only sites with the mixed use potential should be supported. The Traveller Movement suggested that criterion h) should be reworded to indicate that mixed use proposals would be welcomed, but would not be required.

A Planning Consultant objected to policy H4 and said that it is not PPTS / NPPF compliant. The consultant claimed that it is a criteria based policy which fails to identify levels of need and fails to identify suitable sites or broad locations for sites. The consultant considered it regrettable that no options were included at the Issues and Options stage however, the fact that a policy is included was supported.

Policy H4 was considered to be unduly onerous as it requires 9 criteria to be satisfied. Objections were raised to all criteria as follows:

a) Stipulation that there must first be need is contrary to paragraph 22(d) of Planning Policy for Traveller Sites (2012).
b) Is not Framework compliant, sites can be permitted if other material considerations support provision.
c) Does not allow sequential and exception tests for sites in Flood Risk Zone 2.
d) Will be relied upon to refuse every application.
e) Should not require all settlements to provide all of these services, change to most if not all. What noise and air quality issues do you have in Fylde?
f) The guidance is dated 2008 and paragraph 1.13 makes it clear it was not intended for private sites but was drafted to inform socially provided sites, it does not address the needs of showmen sites.
g) i) repeats g) does it really add anything?
h) Only applies to showpeople, few if any gypsies operate mixed use sites.

A task list of a further 12 actions was included in order to make the policy sound.

Justification and Evidence

Blackpool Council welcomed the reference to joint working in order to provide for the accommodation needs of Gypsies, Travellers and Travelling Show People. Blackpool Council considered paragraphs 10.59 and 10.60 should be updated to reflect the proposed Fylde Coast Gypsy and Traveller Accommodation Assessment.

The Traveller Movement commented that paragraph 10.59 indicates that an up-to-date needs assessment has been carried out, however, it is a source of concern that the Council has not defined targets for additional provision. Planning policy for traveller sites indicates that ministers expect this to have been done by March 2013. The level of unauthorised development in the area and the shortage of accommodation across Lancashire suggest there is an unmet need and to be legally compliant and sound the submission version of the Local Plan will need to set targets and identify a supply of deliverable sites and broad areas
for growth. The Planning Consultant commented that the 2007 study did not address showpeople or need to 2030, it cannot be relied on and it was not available on the Council’s website.

**Council response**

**General Comments**
The Local Plan will be amended so that the words Gypsies and Travellers are always referred to with an initial capital letter. There is a legal requirement for the Council to meet the accommodation needs of Gypsies and Travellers in their area, therefore this will continue to be included in the Local Plan. Residents will be consulted on the inclusion of sites in the Local Plan (Part 2). With respect to fly grazing, it is not possible for the Council to request that adequate grazing land is provided as this is not covered by planning legislation.

With respect to Blackpool’s comments, paragraph 10.60 makes it clear that policy H4 of the Preferred Options document should be used in a positive way for the provision of plots and pitches. The subsequent Local Plan Part 2: Site Allocations to 2030 document will allocate the location of specific sites. It is likely that the policy will be used to select suitable sites and this will be made clear in the justification.

**Policy H4**
Policy H4 in the Preferred Options document was drafted in accordance with advice from the Planning Advisory Service. The whole Local Plan was read and the council was advised that it was NPPF compliant.

With respect to the Traveller Movement’s comments, criterion e) will not be amended in the way suggested as “accessible” is open to interpretation and allowing development away from settlements in unsustainable. Criteria d) is about the location of the site and its external appearance i.e. landscaping, f) concerns the internal spaces, layout etc, they are both necessary. Criterion h) says ‘should have the potential’, this is in line with the NPPF which promotes mixed use sites.

With respect to the Planning Consultants comments, policy H4 (on its own) was never considered to be sound and compliant with the guidance. Paragraph 10.60 makes it clear that subsequent Local Plan Part 2: Site Allocations to 2030 document will allocate the locations of specific sites based on an updated study of need. With respect to the criteria in the policy:

a) Paragraph 22 of Planning for Traveller Sites states the following:

1. **Local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:**
   
   - the existing level of local provision and need for sites
   - the availability (or lack) of alternative accommodation for the applicants
   - other personal circumstances of the applicant that the locally specific criteria used to guide the allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites
   - that they should determine applications for sites from any travellers and not just those with local connections.

That is, the first consideration is the existing level of local provision and need for sites. The Council does not know yet whether there is an identified need in any specific locality and that is why it has included criteria.

a) The policy is intended to assess applications that come forward on unallocated sites.

b) The Council has decided not to allocate any land in the Green Belt for development. Recent guidance and decisions have supported criterion b).
c) The Council has decided not to allocate any land in Flood Risk Zones 2 or 3. There is plenty of land which is not in Flood Risk Zones that should be considered before areas at risk of flooding.

d) This criterion will not be used to refuse applications. It will simply be used to improve the quality of applications. The Council has recently been minded to approve a site at Newton, however, the decision has been called in.

e) All of the Council’s housing sites are adjacent to settlements which provide all the infrastructure listed, Gypsies and Travellers will need all of these services too. BAE Systems Real Estate Solutions is located in Fylde they test Eurofighter jet engines at Warton, test flights are also very noisy. The existing Local Plan safeguards some areas from development because they are near the runway. The M55 Junction 3 can suffer from congestion as can the A585T.

f) The date of the Good Practice Guidance will be amended and the wording of the policy amended to make it clear it does not apply to showmen’s sites.

g) Criterion g) is included because in Fylde there are settlements where there are large numbers of residential caravan sites which result in the settlement being far larger than is sustainable for its remote location. Criterion l) is about the local services and infrastructure being sufficient to cope with any extra demand from Gypsies and Travellers – these issues would be considered for any residential development.

h) Many of the Gypsies in Fylde (on the edge of Blackpool) do operate mixed use sites, in particular many of them keep horses and run Landeau businesses. Extra land is needed for this and it is sustainable to include this as a mixed use, live work unit.

Justification and Evidence
With respect to evidence, the situation has changed considerably since the Preferred Options document was drafted in November 2012. At that time, the Fylde Coast Authorities were investigating whether the Salford University Study could be updated. The Councils met on several occasions throughout the summer of 2013 and decided to jointly commission a new Fylde Coast Gypsy and Traveller Accommodation Assessment. Consultants were appointed and work is underway and due to be completed in Summer 2014. The consultants have contacted the Gypsy and Traveller Movement and also the Planning Consultant who made responses to the Preferred Options consultation. The study follows a recognised methodology and involves interviewing Gypsies, Travellers and Travelling Showpeople. It will provide an objective assessment of the need for pitches and plots for each Local Authority (Blackpool, Fylde and Wyre) to 2030. The results of the study will be used to inform the redrafting of this part of the Local Plan.

Recommendations for change

- Amend the Local Plan so that the words Gypsies and Travellers are always referred to with an initial capital letter.
- Amend policy H4, criterion f) of the Preferred Options document, CLG 2008 also make it clear that Criterion f) does not apply to Travelling Showpeople Sites.
- Amend the Gypsies, Travellers and Travelling Showpeople’s section of the Local Plan to reflect the findings of the Gypsy and Traveller Accommodation Assessment 2014.
Policy H5 Isolated New Homes in the Countryside

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Representations received from:

- Treales, Roseacre and Wharles Parish Council
- English Heritage
- Campaign to Protect Rural England (CPRE) – Fylde District
- A Developer

What you said

Treales, Roseacre and Wharles Parish Council asked: what is the Definition of a Rural Worker?

CPRE – Fylde District commended this policy for the restrictions they place on impacting on the rural landscape of the Borough. The policy should state the applicable designations: Countryside and Green Belt.

English Heritage welcomed the inclusion of conversion and re-use of heritage assets within this policy.

The developer referred to paragraph 55 of the NPPF which clearly states that new isolated homes in the countryside can also be acceptable when the development would re-use redundant or disused buildings and lead to an enhancement of the immediate setting. The developer suggested that policy H5 of the Preferred Options document should therefore be amended to reflect NPPF paragraph 55 if it is to be sound.

Members Decision

Should the Council define ‘rural worker’? If so, the definition needs to be broad and not classify particular occupations. Defining what is classed as an essential need. The NPPF is clear in that it no longer retains the traditional definition.

Members agreed at the LPSG meeting on 10th June 2014 that there should not be a definition of rural worker in the Local Plan. It was agreed that it should be left to the discretion of the Development Management Committee when determining individual planning applications.

Council response

A rural worker is someone who has an “essential need … to live permanently at or near their place of work in the countryside”. (paragraph 55 of the NPPF).

The title of policy H5 in the Preferred Options document is ‘Isolated New Homes in the Countryside’, as such it is not necessary to mention the words Green Belt.

Policy H5 in the Preferred Options document includes a reference to the re-use of redundant buildings and enhancement of the immediate setting at 2b). Consequently, no further change is necessary.
Recommendations for change

- None

**Policy H6 Replacements of, and Extensions to, Existing Dwellings in the Countryside**

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Representations received from:

- Treales, Roseacre and Wharles Parish Council
- Lancashire Wildlife Trust
- Campaign to Protect Rural England (CPRE) – Fylde District
- 1 Developer

**What you said**

Treales, Wharles and Roseacre Parish Council advised that the text be reviewed with a legal opinion to ensure that there is no ambiguity of the expansion (e.g. what does an integral garage / workshop mean – one that is attached by one wall and / or one that fits within the footprint [partially or completely] of a two storey or more dwelling) and the baseline by which it is referenced. This has been a matter of significant ambiguity for developer, consultee, officer and borough councillor.

CPRE – Fylde District commended this policy for the restrictions it places on impacting on the rural landscape of the Borough. The policy should state the applicable designations: Countryside and Green Belt.

Lancashire Wildlife Trust commented that there is no mention of the existing ecology of the site to be expanded on by a possible 25% increase in dwelling size. The Wildlife Trust claimed that paragraph 21 of the NPPF applies.

A developer objected saying that the restriction of extensions to 25% of the ground floor area of the existing dwelling is an entirely arbitrary figure with no justification and is considered too low. The policy should also allow a degree of flexibility so that each case can be considered on its own merits.

**Council response**

The Council agrees to set out the definition of an integral garage in the Local Plan. Policy H6 in the Preferred Options document is entitled ‘Replacements of, and Extensions to, Existing Dwellings in the Countryside’, and it is therefore not necessary to mention the words Green Belt.

The policy was specifically drafted to deal with the issue of small traditional dwellings being replaced by much larger modern homes. The policy has deliberately been worded so that it cannot be open to interpretation.
In answer to the Wildlife Trust’s comments, the Council considers it necessary to draft a separate policy on nature conservation (biodiversity). Policy ENV1 will focus entirely on landscape issues. The new policy on nature conservation (biodiversity) in chapter 14, will set out the hierarchy of nature conservation designations, species and habitat protection and enhancement. The Wildlife Trust refers in their submission to paragraph 21 of the NPPF, but this paragraph in the NPPF relates to investment in business and not to nature conservation issues.

**Recommendations for change**

- Add the following definition of an integral garage in the Glossary: “An integral garage is a building for parking vehicles, attached to another building, such as a house. Typically, integral garages have three walls, a roof and a door opening large enough for vehicles to enter the building. Select integral garages also have doorways from the garage to the connecting building.”
Chapter 11: Health and Wellbeing

Policy HW1: Health and Wellbeing

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Representations received from:
- Environment Agency
- Sport England
- BAE Systems Real Estate Solutions

What you said

BAE Systems Real Estate Solutions suggested guidance as to when a full Health Impact Assessment (HIA) may be required (i.e. the thresholds) and what may be expected within an HIA would be useful in the policy supporting information.

Sport England suggested that it was not clear from the wording of part b) what is meant by new facilities and that clarification is required. Does this also include indoor and outdoor sports provision? If it does then part c) could be contrary to paragraph 74 of the NPPF. If developers contributions are sought for where housing results in a shortfall or worsening of provision of a sports facility then this is in direct conflict with the criteria of paragraph 74. This says no loss unless it is clearly demonstrated to be surplus to requirement, or is replaced. This would also be in direct conflict with Sport England policy, which largely reflects the criteria of paragraph 74 of the NPPF.

The Environment Agency felt that it was important that the remediation of contaminated land is incorporated into an appropriate policy, either Local Plan Part 1 or Part 2. If this is within Part 1, this may be appropriate in policy HW1 and policy CL1 in relation to the risk to human health and controlled waters from land contamination. (The Environment Agency claimed that NPPF paragraphs 121-122 only relate to land quality and not land contamination).

Council response

Lancashire County Council is currently exploring the provision of a Health Impact Assessment (HIA) template and guidance document. Reference to future guidance and the HIA template will be provided within the policy justification.

The Council agrees with Sport England that clarification is required over the wording in parts b) and c) over what is meant by new facilities. New facilities actually refers to the provision of healthcare, as set out in part a). The Council will amend the text to refer to healthcare facilities in both parts b) and c).

The Council agrees with the Environment Agency that it is important for the remediation of contaminated land to be dealt with in an appropriate policy. It is considered appropriate to devise a new policy dealing with contaminated land, together with supporting text.

The Council agrees with Sport England for a separate policy on community facilities within the Health and Wellbeing chapter (chapter 11).
Recommendations for change

- Amend part b) of policy HW1 to read: “... identifying sites for new healthcare facilities reflecting the spatial distribution ...”

- Amend part c) of policy HW1 to read: “... towards new or enhanced healthcare facilities from developers ...”

- Add the following sentence at the end of paragraph 11.15 of the Preferred Options: “Lancashire County Council is currently exploring the provision of a Health Impact Assessment (HIA) template and guidance document”.

- Add a new policy on community facilities in chapter 11 (the Health and Wellbeing chapter).

- Add a new policy on contaminated land constraints, with accompanying supporting text, in chapter 11.
Chapter 12: Infrastructure, Service Provision and Transport

Chapter 12 General Comments:

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Representations received from:

- Wyre Borough Council
- Lancashire County Council
- Blackpool, Fylde and Wyre Trades Union Council
- Mobile Operators Association

What you said

Wyre Borough Council considered that the Local Plan and Infrastructure Delivery Plan must address the infrastructure constraints in the Borough so as to ensure that the development needs are delivered in a timely and co-ordinated manner.

The Mobile Operators Association suggested that a telecommunications policy is needed in the Local Plan. The Association said that telecommunications plays a vital role in the economic and social fabric of communities, and that this is recognised in the NPPF.

Blackpool, Fylde and Wyre Trades Union Council claimed that it is essential that there are services to support new housing, and that great care is needed to get this part of the Plan right.

Lancashire County Council supported the planned growth in Warton as it will complement the County Council's economic ambitions for the Enterprise Zone located at the BAE Systems site which is seeking to attract advanced engineering and manufacturing employment into the area. The County Council went on to say that given the existing size of Warton, it will be necessary to provide significant increased levels of infrastructure and service provision in order to ensure a sustainable form of development.

Council response

The Infrastructure Delivery Plan, which will include the Infrastructure Schedule and the Regulation 123 list, will assess what social, transport, energy and green infrastructure and services will be required to support the development and accommodate all of the growth proposed in the Local Plan, including details of costs, funding and delivery.

The Council considers that there is no need to include a policy on telecommunications in the Local Plan as all of the requirements for the development of new telecommunications equipment are covered comprehensively in paragraphs 42 to 46 inclusive of the NPPF. The Council does not wish to prepare a policy for the Local Plan which would simply duplicate the guidance and advice provided in the NPPF.

In terms of Lancashire County Council’s comments on the planned growth in Warton, it is noted that much of this infrastructure and service provision required relates to County Council functions.
Recommendations for change

- None

Policy INF1: Service Accessibility and Infrastructure

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Representations received from:

- Ribby with Wrea Parish Council
- Blackpool Council
- Lancashire County Council
- BAE Systems Real Estate Solutions
- Environment Agency
- Highways Agency
- Sport England
- Home Builders Federation
- National Union of Teachers – Fylde Association
- United Utilities
- Holy Family Catholic Primary School
- 46 residents
- 2 residential developers

What you said

A resident suggested that part (a) of the policy is subjective and therefore not enforceable. Numerous comments were submitted recommending the deletion of this part of the policy and its replacement with a criterion that prohibits development where existing infrastructure is inadequate, with no realistic prospect of the infrastructure being improved. Residents were concerned that infrastructure solutions should not rely on pumped sustainable drainage systems.

Two residents suggested that the 2021 completion for the M55 link road (the Preston Western Distributor road) at Bartle in north west Preston is optimistic, and that development at Warton will have taken place before this road is completed; that if the Warton bypass goes ahead, there will be no money left to fund extra services in Warton; that there is no firm commitment to improve the flood defences; that there is no firm commitment to improve utilities infrastructure; and that the Local Plan does not address the issues that arise from increased traffic.

BAE Systems Real Estate Solutions supported the provision of a new secondary school within Warton, as this will benefit existing residents and will create a more sustainable community within the enlarged settlement.

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^24 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
Two residential developers claimed that there is little mention of the case for a new secondary school in the plan. Some residents questioned why the school is proposed at Warton when the need is in Lytham St Annes, whilst others suggested that a new school would detrimentally impact upon existing schools. Some residents said that a new secondary school at Warton will put pressure on existing infrastructure. One resident claimed that ONS statistics show a fall in the number of children, therefore a new secondary school is not required in the Borough.

The Holy Family Catholic Primary School raised concerns that there is no mention of a requirement for primary schools in the plan, adding that the school has few places available to accommodate children and their families moving to the area. They asked whether there should be plans to extend or develop the current schools in Warton to provide sufficient primary school places for the new children to the area.

The Highways Agency were generally supportive of the approach proposed for the delivery of new and improved infrastructure. The Environment Agency strongly supported this policy, along with the proposed phasing to coincide with improvements to the sewage network, and that this will ensure that new development does not detrimentally impact upon bathing water quality objectives.

United Utilities suggested the following amended wording for Policy INF1:

“New development will be required to provide essential site service and communications infrastructure and demonstrate that it will support infrastructure requirements as set out in the Infrastructure Delivery Plan. In order for Fylde to protect and create sustainable communities, proposals for development should:

e) In considering development proposals, it may be necessary to co-ordinate the timescales for delivery of development with the timescales for the delivery of infrastructure. For large development sites, which may be constructed over a number of years and by various developers, it will be necessary to ensure a co-ordinated and holistic approach to the delivery of infrastructure, especially drainage infrastructure through the requirement for site wide strategies which establish principles to be adhered to during the construction process.”

Blackpool Council suggested that an additional new school is needed on the edge of Blackpool and that Blackpool Council and Lancashire County Council are in discussion over potential sites. They recommended that reference be made in the Local Plan to a new school in this area.

Sport England would have expected to see a separate policy on community facilities within the Health and Wellbeing chapter (chapter 11). As many community facilities are also sports facilities, Sport England would expect the delivery to be based on the findings of an Indoor Sports Strategy.

The Home Builders Federation and a resident claimed that the policy is unsound because there has been no assessment of viability.

Council response

Part (a) of the policy is strategic in that the strategic locations identified in the Preferred Options document have been assessed against their sustainability, including infrastructure capacity. Although Warton is deficient in terms of some infrastructure and services, the area benefits from the Lancashire Enterprise Zone at BAE Systems, Warton, the proposed link road (the construction of the Preston Western Distributor) to a new junction 2 on the M55, near Bartle and its close proximity to the wastewater treatment works at Clifton Marsh.

The Infrastructure Delivery Plan will set out, as far as possible, the infrastructure and services that are required to support the Local Plan. The draft Infrastructure Delivery Plan is currently being amended and will be re-issued when the Council consults on the Publication version of the Local Plan.

Comments regarding secondary school provision are noted. The Council has set up the Fylde Education Liaison Group and is working closely with staff at the Local Education Authority at County Hall, who are
evaluating the possible need and location for an additional secondary school in Fylde, together with potential extensions to the existing primary schools.

Lancashire County Council has undertaken an assessment that shows the estimated yield of primary and secondary school pupils for each of the strategic sites. This includes the overall additional primary forms of entry that would be required. It is anticipated that the Infrastructure Delivery Plan will detail the results of this assessment along with costs of provision and funding sources. The Council will publish Lancashire County Council’s sequential assessment of potential sites for a new secondary school on the Council’s website.

The Council acknowledges that an additional new primary / secondary school is needed at the edge of Blackpool, and the Council will make reference to this in the Infrastructure Delivery Plan. The Council will also consider whether reference should also be made in the Local Plan (Part 1).

The Council is in discussions with Lancashire County Council’s Education Department regarding requirements for possible new and/or extensions to existing primary schools in Warton and to Fylde in general, to provide sufficient primary school places for the new children to the area.

The Council will amend the wording in policy INF1 as suggested by United Utilities.

A viability study of the Local Plan Preferred Options document has been undertaken which takes account of the 2012 Local Housing Delivery Group guidance on ‘Viability Testing of Local Plans.’ The Viability Assessment of the Local Plan – Preferred Options document is summarised in the appendices of this consultation statement. Further viability testing will take place on the Local Plan before the Publication version is issued.

The Council will amend the reference to “Fylde-Blackpool Periphery” in part (e) of policy INF1.

The Council agrees with Sport England for a separate policy on community facilities within the Health and Wellbeing chapter (chapter 11).

The Council agrees to amend the definition of community facilities in the policy to mirror the amended definition in the glossary.

**Recommendations for change**

- Amend policy INF1 (e): “e) In considering development proposals, it may be necessary to co-ordinate the timescales for delivery of development with the timescales for the delivery of infrastructure. For large development sites, which may be constructed over a number of years and by various developers, it will be necessary to ensure a co-ordinated and holistic approach to the delivery of infrastructure, especially drainage infrastructure through the requirement for site wide strategies which establish principles to be adhered to during the construction process.”

- Amend the reference to community facilities in policy INF1 to read: “Development proposals for new community facilities, which provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community, should be co-located where possible, providing mixed uses and a range of services in one sustainable and accessible location.”

- Include a reference to a new secondary school for Fylde, location yet to be determined, in the Infrastructure Delivery Plan.
The Council will publish Lancashire County Council’s sequential assessment of potential sites for a new secondary school on the Council’s website, once the information has been received.

**Policy INF2: Developer Contributions**

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Representations received from:

- Environment Agency
- Highways Agency
- Home Builders Federation
- Lancashire Wildlife Trust
- Sport England
- United Utilities
- Pendle Production Ltd
- 3 residents

**What you said**

The Home Builders Federation suggested that if the Council adopts a Community Infrastructure Levy, policy INF2 will need to explain that any funds received through Section 106 agreements will relate solely to the requirements necessary to make the development acceptable in planning terms; be directly related to the development and be fairly and reasonably related in scale and kind to the development.

Pendle Production Ltd commented that the Local Plan gives an over-emphasis to sporting provision without balancing the cultural needs of the community. They considered that developers should be encouraged to contribute towards cultural activities, as this can increase well-being and community cohesion.

A resident suggested that the Plan should protect the Council against land banking; that the Plan informs developers that housing numbers will be adjusted downwards for each year the promised build numbers are not met by the developer; and that developers failing to build should be made to resubmit applications.

Two residents claimed that Warton residents have no confidence in this policy. The residents said that there has recently been significant growth at Warton, but that there is no evidence that the infrastructure in this policy is being provided, apart from affordable housing and grass.

The Lancashire Wildlife Trust supported part (e) of policy INF2 in relation to green infrastructure.

Sport England welcomed the inclusion of outdoor sports facilities in part e) of policy INF2.

The Environment Agency strongly supported the inclusion of flood prevention and sustainable drainage measures in policy INF2.

United Utilities suggested the following amended wording for Policy INF2:
“The types of infrastructure that developments may be required to provide contributions towards include, but are not limited to:
b) Flood prevention and sustainable drainage measures (both on site and borough wide, including the retrofitting of sustainable drainage systems (see policy CL1);”

The Highways Agency were generally supportive of securing developer contributions, particularly through the Community Infrastructure Levy to ensure contributions are made towards the cost of transport infrastructure to mitigate the adverse impacts of new development. They also suggested that there should be no reliance on the blue route when assessing the impact of the Local Plan on the strategic road network, as the route is uncertain.

The Home Builders Federation claimed that policy INF2 is unsound because there has been no assessment of viability.

Council response

The Government’s policy tests on the use of planning obligations is set out in Circular 5/05 and therefore does not need to be repeated in the Local Plan.

The Council will make reference to “culture” in part (d) of policy INF2.

The Council agrees to rationalise the definition of community facilities in part (d) of policy INF2 to refer to the amended definition in the glossary.

The Council is updating its evidence base in respect of playing pitch provision, and the Local Plan will give due weight to the findings of this evidence.

The Local Plan cannot stop developers from land banking.

The Council will amend the wording in policy INF2 as suggested by United Utilities.

Sport England’s comments are noted.

The Highways Agency have commissioned consultants to undertake modelling work to enable a better understanding of the impact of the growth proposed in the Local Plan on the strategic road network. This will be a significant source of evidence to support the Local Plan and the results of the modelling work will feed into the Fylde Coast Highways and Transport Masterplan.

Viability testing of the Local Plan: Preferred Options document was completed in January 2014. Further viability testing will take place before the Publication version of the Local Plan is issued.

Recommendations for change

- Amend policy INF2 (b) to: b) Flood prevention and sustainable drainage measures (both on site and borough wide, including the retrofitting of sustainable drainage systems (see policy CL1));

- Amend criterion d) of policy INF2 to read: “Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community”.

- Amend criterion (e) of policy INF2 to read: “Green infrastructure – the network of natural environmental components and green and blue spaces (such as outdoor
sports facilities…” so that the definition accords with the amended definition that is set out in the glossary.

**Policy T1: Strategic Highway Improvements**

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Representations received from:
- Blackpool Council
- Wyre Borough Council
- Lancashire County Council
- BAE Systems Real Estate Solutions
- Highways Agency
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors

**What you said**

BAE Systems Real Estate Solutions supported the highway proposals for the new link road (the Preston Western Distributor Road) running from Lea Gate in the south to the M55 in the north and agreed that it should assist access to the Enterprise Zone at Warton. BAE Systems Real Estate Solutions will continue to work with the Local Enterprise Partnership and the Councils in assessing the opportunities, identifying the infrastructure needs and costs and analysing the phasing and delivery options around the development within the Enterprise Zone.

Blackpool Council welcomed the policy to improve the identified routes. They suggested it would be appropriate to provide some evidence that alternatives to the identified routes have been considered and also that an M55 upgrade will not be required. They also suggested that it may be appropriate to include an undertaking within the background text to minimise landscape, biodiversity, drainage, severance and noise impacts, together with a commitment to environmentally sensitive design, mitigation and habitat provision. They also suggested that it may be helpful to know what the overall strategic aims for the Highways Network are, as identified locally.

Wyre Borough Council noted the continued support for the protection of the M55 - Norcross Link Road (i.e. the Blue Route). They considered that our two Local Plans will have to ensure that any safeguarded route is properly aligned between our districts and it will be important for the two Councils to work together with Lancashire County Council on the Fylde Coast Highways and Transport Masterplan.

Lancashire County Council welcomed references to the emerging Fylde Coast Highways and Transport Masterplan and its importance in the identification and taking forward of transport proposals and initiatives.

The Highways Agency acknowledged the intention to safeguard the proposed route of the M55 – Norcross Link Road (the Blue Route). Due to the funding status of the link road, the Agency notes that this is not a confirmed scheme and therefore recognition of this would need to be given when considering the impacts of additional traffic demands and the need to identify supporting measures. This is particularly important to note, if there is to be any reliance on this scheme to support the development aspirations of the Plan.

25 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
The Highways Agency also noted the intentions of the M55 to Heyhouses Link Road to improve access to the strategic sites identified in policy SL1 in chapter 7. It welcomed the fact that the funding and delivery of this scheme will be provided by the developer and welcomed the fact that this has been clearly presented in the supporting Infrastructure Schedule.

The Highways Agency are supportive of the proposed Preston Western Distributor Road which will contribute to alleviating congestion from new developments. They wish to be fully involved in the consultation process to understand and consider the new infrastructure requirements and potential impact of the proposed new link road on the M55.

The Highways Agency noted that the Fylde Coast Highways and Transport Masterplan is currently being prepared and will provide a transport evidence base to inform future highways and transport strategy development and the basis for future decisions on infrastructure planning and strategic priorities for this area. It is therefore not currently clear on what evidence the current transport infrastructure proposals are based, whether the cumulative impacts of the Plan's development aspirations have been fully assessed and therefore whether the measures set out within the Plan and supporting Infrastructure Delivery Plan are, appropriate, viable and deliverable. Once the Masterplan is reviewed the Highways Agency will be able to provide more detailed comment on the Plan's proposals and the suitability of the transport infrastructure improvements proposed.

The Highways Agency is particularly interested in the evidence that has been developed to determine the potential impacts of the Plan's development aspirations and respective measures and transport infrastructure improvements. This is required to ensure that from the Agency's perspective, such measures are appropriate, viable and deliverable and that the operation and safety of the strategic road network will not be compromised as a consequence.

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors emphasised the need to make greater efforts to promote improvements to the South Fylde Line. It should have a far higher priority and improvements to this line must be championed by Fylde Borough Council. Rail transport is sustainable and creates far fewer emissions and infrastructure improvements should be promoted and supported.

Council response

BAE Systems Real Estate Solutions, Wyre Borough Council's and Lancashire County Council's comments are noted.

The Council will update the list of strategic highway improvements in policy T1 to mirror those mentioned in the Fylde Coast Highways and Transport Masterplan when the masterplan is issued for consultation in Autumn 2014.

In terms of the comments made by Blackpool Council, Lancashire County Council as the Highway Authority, would be in a better position to provide evidence that alternatives to the identified routes have been considered and what the overall strategic aims for the Highways Network are, as identified locally. Equally, the Highways Agency would be able to answer the question as to whether the M55 requires to be upgraded or not. The current transport infrastructure proposals are based upon the priorities contained in Lancashire County Council's Local Transport Plan 3 (LTP3) 2011-2021, Implementation Plan 2012/13 – 14/15. The Fylde Coast Highways and Transport Masterplan, which is due out for consultation in Autumn 2014, will provide a transport evidence base for future road schemes and public transport initiatives, which will be implemented within the lifetime of the Local Plan.

The Highways Agency's comments about the M55 to Heyhouses Link Road and the Preston Western Distributor Road are noted. When referring to the M55 – Norcross Link Road (the Blue Route), the most up-to-date status possible will be afforded to this route.
The Council agrees with Blackpool Council’s suggestion to refer in the supporting text to minimising landscape, biodiversity, drainage, severance and noise impacts, together with a commitment to environmentally sensitive design, mitigation and habitat re-provision.

The Council considers it necessary and helpful to cross refer in policy T1 to the good design policy (formerly policy ENV6, but it will become policy GD5 in the next version of the Local Plan), to the landscape policy (policy ENV1) and to a new policy which will be prepared on biodiversity in chapter 14.

The Council intends to draft an additional policy in chapter 8, which will set out general transport considerations for determining planning applications.

### Recommendations for change

- The strategic highway improvements listed in policy T1, together with the supporting text, will be updated in line with the schemes identified in the Fylde Coast Highways and Transport Masterplan, when it is issued for consultation in Autumn 2014.

- Add the following sentence at the end of policy T1: “Proposals for new roads and for strategic highways improvements will need to comply with the requirements of policy GD5 on good design in development and policy ENV1 on landscape and policy ENV2 on biodiversity.”

- Add an extra paragraph after paragraph 12.40 of the Preferred Options saying: “The Council will work with Lancashire County Council, as the Highway Authority, to minimise landscape, biodiversity, drainage, severance and noise impacts. There will be a commitment to environmentally sensitive design, mitigation and habitat re-provision.”

- Draft a new policy in chapter 8 which will set out general transport considerations for determining planning applications.

### Policy T2: Blackpool International Airport

#### Number of representations:

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Representations received from:
- Blackpool Council
- Blackpool International Airport
- Centrica

### What you said

Blackpool International Airport noted the emerging Local Plan essentially carries forward the previous policy approach to planning for the Airport and they welcomed the Council’s commitment to supporting the continued operation and viability of the Airport. However, in order to deliver this support, the policy framework must better reflect the challenges and opportunities at Blackpool International Airport in the...
context of a national decline in the growth of air travel since 2008. In particular, to ensure the need to be aligned with the emerging Airport Master Plan which enables consolidation and release of land at the airport for non-aviation uses to meet other identified needs in Fylde including housing land supply.

Blackpool International Airport are seeking a policy framework which:

- Establishes the Council's ongoing commitment to support the continued operation and viability of the Airport as an important regional facility;
- Identifies the Airport as an area of change; and
- Provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting the Airport).

Blackpool Council supported the policy but would welcome support for improvements to surface access (public transport) to the airport from surrounding areas and other transport nodes.

Centrica requested that its heliport and associated facilities be safeguarded by policy T2. It is suggested that an Airport Safeguarding Zone should be designated around Blackpool International Airport, which should include Centrica's heliport. This Zone should be shown on the Local Plan Policies Map and development of buildings or structures within this Zone, which might restrict or have a negative impact on the operation of the Airport and Centrica's heliport, should be resisted.

Council response

Comments relating to a review of Green Belt are dealt with under the Council Response to policy GD1 in chapter 8 and in paragraph 8.7 of the Preferred Options document. Paragraph 8.7 says that: “no strategic review of the Green Belt within Fylde Borough will be undertaken when producing the Local Plan”. The NPPF clarifies that “Green Belt boundaries should only be altered in exceptional circumstances”. The Council does not believe that there are “exceptional circumstances” to review the Green Belt.

In terms of flexibility at Blackpool International Airport, the Government recently made it clear that it is up to the LPA whether Green Belt should be released for residential use. Retail development is not considered to be acceptable on the site. The retail hierarchy is set out in policy EC4 in chapter 9. The settlement hierarchy, in terms of key service centres and local service centres, is set out in paragraphs 6.8 and 6.9 of chapter 6 – The Spatial Development Framework. The Employment Land and Premises Study, 2012, recommended the Blackpool International Airport land for B1 (a) offices at paragraph 11.18 of the Study and at Table 66. At paragraph 11.17 of the Employment Land and Premises Study, however, it was stated that at least half of the land should be allocated for B1, B2 and B8 employment uses. In paragraph 11.17, BE Group made the general comment that half the site should be secured for B-class employment, rather than retail use. Uses considered to be suitable would reflect what is already in place on Amy Johnson Way.

The Council agrees that an Airport Safeguarding Zone should be designated around Blackpool International Airport and that the airport should include Centrica's heliport. The Council agrees to make reference to Centrica's heliport and associated facilities within Policy T2. The Council agrees to include the Airport Safeguarding Zone on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan. The Council agrees to strengthen the wording in the policy regarding the Airport Safeguarding Zone at Blackpool International Airport and to include a reference to consulting with the airport on proposed new developments in proximity to the airport.

It is recommended that improved surface access movement to and from Blackpool International Airport should be specifically addressed via an Airport Surface Access Strategy. Policy T2 will be expanded to promote the Airport Surface Access Strategy.
Recommendations for change

- Designate an Airport Safeguarding Zone around Blackpool International Airport, incorporating Centrica's heliport and identify the Airport Safeguarding Zone on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).

- Strengthen the wording in policy T2 regarding the Airport Safeguarding Zone.

- Include a reference in policy T2 to Centrica’s heliport and associated facilities at Blackpool International Airport.

- Insert a reference in policy T2 to the Airport Surface Access Strategy.

Policy T3: Enhancing Sustainable Transport Choice

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Representations received from:
- Blackpool Council
- Highways Agency
- National Farmers Union
- Lancashire Wildlife Trust
- 1 Resident

What you said

A resident commented that if off-road routes for walkers and cyclists were done in an imaginative way, it may also be possible to link the local routes into a circle or ring in the Fylde, possibly incorporating the Promenade or coastline. This would be a valuable leisure facility for residents and an attraction for visitors.

Blackpool Council supported the aims of this policy and the coverage that it has over different factors affecting sustainable transport. They suggested it may be helpful to mention the need to join the different transport modes and co-ordinate times and routes to ensure a comprehensive and coherent sustainable transport network. Also, travel plans will need to be monitored to ensure that they are acted upon.

Blackpool Council suggested some amended wording for paragraph 12.49 to “…could include”.

The Highways Agency was particularly supportive of this policy - working with neighbouring authorities and transport providers to improve accessibility and movement across the borough and to ensuring new development proposals are supported by travel plans in accordance with Department for Transport guidance on transport assessments. The Highways Agency supported a modal shift away from the private car as it should help to reduce the need to travel and therefore have beneficial implications for the strategic road network.

The National Farmers Union requested being consulted when any changes or upgrades to existing rights of way or creation of new routes are planned in the rural area.
Lancashire Wildlife Trust confirmed that part of the South Fylde Railway Line is designated as a biological heritage site (BHS 33SW02).

Council response

The comments made by a resident, the Highways Agency, National Farmers Union and the Lancashire Wildlife Trust are noted.

The Council agrees with Blackpool Council’s proposed wording change at paragraph 12.49 to “… could include…”

The Council will amend policy T3 in respect of integrating different modes of transport.

The Council agrees with Lancashire Wildlife Trust to insert text confirming that part of the South Fylde Railway Line is designated as a biological heritage site (BHS 33SW02).

Recommendations for change

- Add the following new sentence at the end of paragraph 12.48 of the Preferred Options: “Part of the South Fylde Railway Line is designated as a biological heritage site (BHS 33SW02)”.
- Amend paragraph 12.49 of the Preferred Options to “…could include”.
- Add a new criterion i) to policy T3: “work with service providers to integrate different modes of transport, to ensure a comprehensive and coherent sustainable transport network”.

Policy T4: Parking Standards

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Representations received from:

- Highways Agency

What you said

The Highways Agency will consider parking standards as part of the planning application process but would wish to ensure that sufficient consideration is given to reduce the need to travel and consider the influence that car parking provision has on this aspiration.

Council response

The Highways Agency’s comments are noted. The Council supports reducing the need to travel. It is considered that the proposed car parking provision supports this.
Recommendations for change

- None
Chapter 13: Sustaining the Environment and Addressing Climate Change

Number of representations:

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Representations received from:
- One residential developer

What you said

A residential developer welcomed the exclusions of a blanket approach to renewable energy requirements.

Council response

Comments noted.

Recommendations for change

- None

Policy CL1: Flood Alleviation and Water Efficiency

Number of representations:

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Representations received from:
- Campaign to Protect Rural England (CPRE) – Fylde District
- English Heritage
- Environment Agency
- United Utilities
- National Farmers Union
- Westby-with-Plumptons Parish Council
- Blackpool Council
- Lancashire County Council
- 2 residents
- 1 residential developer

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26 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
What you said

United Utilities suggested amending the wording of criterion (a) of policy CL1 to say: “Ensuring that new development incorporates ‘the most sustainable form of managing surface water. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. This would be greenfield run off rate on greenfield sites. On brownfield sites surface water betterment will be expected. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. The priority options for the management of surface water are set out in detail in the infrastructure delivery plan’.”

Surface Water Flooding
The Environment Agency suggested that paragraph 13.11 should make reference to surface water flooding; and that the first sentence of paragraph 13.11 should be amended to say: “The Level 1 Strategic Flood Risk Assessment for Fylde (2011) provides an assessment of current and future levels of flood risk in the Borough.”

The EA strongly supported policy CL1. They recommended that the name of the policy should be amended to: “Policy CL1 Flood Alleviation, Water Quality and Water Efficiency”, and that part (g) of the policy is amended so that it says: “Ensuring that new development does not adversely affect the quality of surface and groundwater and where possible contributes towards improving it.”

A resident commented that agricultural land is out of production due to flooding. Westby with Plumptons Parish Council made similar comments, adding that the drainage system has been poorly maintained; that the pumping station at Lytham is non-functional; and that new housing and commercial development should not take place. CPRE – Fylde District commented that the issue of prevention and alleviation of flooding of agricultural land should be acknowledged explicitly in policy CL1.

After paragraph 13.17, United Utilities suggested that the council could consider including the following paragraph:
“It is a clear priority of the council that development should not discharge to public sewerage system, directly or indirectly, where alternatives are available. In some circumstances, however, discharge to public sewer, directly or indirectly, may be the only option. In those circumstances, a contribution may be requested to retrofit / divert surface water elsewhere in the borough to negate the impact of discharging surface water to the public sewer. The applicant will also be expected to mitigate the impact of surface water discharge to the public sewer through landscaping schemes and other measures, which will include maximising the use of permeable surfaces and grey water and rainwater harvesting measures.”

The National Farmers Union were pleased that paragraph 13.19 recognises the issues faced by the agricultural community. They hoped that all future development took into consideration the impact of surface water run-off on the wider community, including farmland. They also stated that they hope that on-going maintenance of drainage would take place on any new development to alleviate flooding in the future.

Sewer Capacity and Sustainable Drainage Systems
Blackpool Council suggested that the policy should ensure that surface water run-off is kept out of any combined sewer system. They also welcomed the support for the retro-fitting of sustainable drainage systems being within the policy and the emphasis being placed on clean bathing water in the supporting text. There was concern from one resident about wastewater flooding at Warton and it was questioned whether the wastewater / sewerage infrastructure would be able to cope with new development.

Lancashire County Council commented that the policy needs to say that sustainable drainage systems should be incorporated into development proposals wherever the opportunity arises, and that traditional drainage solutions should only be considered once all potential sustainable drainage systems options for the proposal have been exhausted. Lancashire County Council also said that the policy and supporting text
should seek to incorporate opportunities to maximise biodiversity into flood defences and sustainable drainage systems wherever possible.

**Water Efficiency**
A residential developer confirmed that Building Regulations set the minimum standards for water use. The developer said that the paragraph 13.21 should reference this, rather than the Code for Sustainable Homes, particularly as the future of the Code is uncertain at present and that the Council does not have a minimum requirement for developments to adhere to the assessment method.

**Water Framework Directive**
The EA recommended that the following criteria should be added to the policy: “There is no risk of pollution to controlled waters from land contamination on previously developed sites.” They added that this will ensure new development on these sites contributes to the objectives of the EU Water Framework Directive.

**Heritage Assets**
English Heritage suggested that the policy should be amended to include reference to the historic environment concerning flooding. They also commented that there is a need to ensure that the schemes being put forward to reduce flooding will not have an adverse impact on the character and setting of historic assets, and also that there may be a need to protect historic assets that are at risk of flooding. They suggested that the following criteria should be added to the policy: “Ensuring that new development and flood alleviation proposals minimise the harm to the significance of heritage assets.”

**Other issues**
The EA strongly supported the requirement in paragraph 13.24 for buffers to be provided around watercourses and water features. They also recommended amending paragraph 13.25 as follows: “Provision of green infrastructure and open space within new developments has a major role to play in mitigating and adapting to climate change, for example by reducing CO₂ emissions, providing flood alleviation measures and the use of sustainable drainage systems.” For paragraph 13.29 they commented that the Pleasure Island defences have a longer residual life than five years, and that the Fylde Coast Protection Strategy should be referred to for more details.

They also recommended that if a flood map is included in the Local Plan, a caveat should be included which states that the map may not be up to date and to check the EA website for the latest information.

**Council response**
The Council will amend policy CL1 as suggested by United Utilities and add a new paragraph after 13.17, regarding surface water.

**Surface Water Flooding**
The Council agrees with the comments made by the EA and will make the necessary changes based upon their comments as outlined above.

The Council will consider whether reference should be made to ensuring that surface water run-off is kept out of the combined sewers within the policy, or whether this should just be referenced in the justification to the policy.

Government regulations from 1 April 2014 will require all major development to incorporate Sustainable Drainage Systems. From 1 April 2017, all minor development will also be required to incorporate sustainable drainage systems. The approval body for sustainable drainage systems will be the Lead Local Flood Authority, which is Lancashire County Council. The County Council will also be responsible for maintaining sustainable drainage systems when adopted.

Surface water flooding of agricultural land is not a reason for not allowing development. The EA have advised the Council that there are normally engineering solutions to surface water issues when new
development takes place. The Council will consider whether reference to the protection of agricultural land from flooding should be included in the policy.

It would be unreasonable to expect developers that have incorporated sustainable drainage systems into their development to be responsible for the maintenance of drains and dykes that are designed to drain farmland. However, the Council will consider drainage improvement measures when developing a Community Infrastructure Levy.

Sewer Capacity and Sustainable Drainage Systems
In terms of the impact on the combined sewers, the Council is engaging with United Utilities to ensure that the combined sewer network can accommodate the proposed level and distribution of development set out in the Local Plan. More details will be set out in the Infrastructure Delivery Plan, which will support the Local Plan.

Given the new sustainable drainage systems regulations implemented in April 2014, the Council considers it necessary to include a policy in the Local Plan (Part 1) on the requirement for sustainable drainage systems.

Water Efficiency
The Department for Communities and Local Government (DCLG) are currently assessing the results of a review of housing standards. Once the results of the review and the recommendations have been fully considered, water efficiency measures may become part of Building Regulations. Consequently, it is anticipated that the Council will no longer include in the Local Plan a requirement for new housing development to achieve the minimum standards for potable water efficiency as defined in the Code for Sustainable Homes. However, the Council will retain reference to water efficiency measures until they become part of Building Regulations.

Water Framework Directive
The Council agrees with the comments made by the EA and will make the necessary changes based upon their comments as outlined above.

Heritage Assets
The Council does not consider that this policy should include reference to the protection of historic assets. Rather, the proposed re-drafted policy ENV5 in chapter 14 of the Preferred Options document is designed to protect and enhance heritage assets.

Other issues
The Council agrees with the comments made by the EA and will make the necessary changes based upon their comments as outlined above.

Recommendations for change

- Amend the first sentence of paragraph 13.11 of the Preferred Options to say: “The Level 1 Strategic Flood Risk Assessment for Fylde (2011) provides an assessment of current and future levels of flood risk in the Borough.”

- Amend the title of policy CL1 to: “Policy CL1 Flood Alleviation, Water Quality and Water Efficiency”.

- Amend part (a) of policy CL1 to say: “Ensuring that new development incorporates the most sustainable form of managing surface water. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of
sustainable drainage systems. This would be greenfield run-off rate on greenfield sites. On brownfield sites surface water betterment will be expected. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. The priority options for the management of surface water are set out in detail in the Infrastructure Delivery Plan”.

- Amend part (g) of policy CL1 to: “Ensuring that new development does not adversely affect the quality of surface and groundwater and where possible contributes towards improving it.” In addition, the following criteria should be added to the policy: “There is no risk of pollution to controlled waters from land contamination on previously developed sites.”

- After paragraph 13.17 of the Preferred Options, add the following new paragraph: “It is a clear priority of the council that development should not discharge to public sewerage system, directly or indirectly, where alternatives are available. In some circumstances, however, discharge to public sewer, directly or indirectly, may be the only option. In those circumstances, a contribution may be requested to retrofit / divert surface water elsewhere in the borough to negate the impact of discharging surface water to the public sewer. The applicant will also be expected to mitigate the impact of surface water discharge to the public sewer through landscaping schemes and other measures, which will include maximising the use of permeable surfaces and grey water and rainwater harvesting measures.”

- Add a new policy on sustainable drainage systems (SuDS).

- Amend paragraph 13.25 of the Preferred Options as follows: “Provision of green infrastructure and open space within new developments has a major role to play in mitigating and adapting to climate change, for example by reducing CO₂ emissions, providing flood alleviation measures and the use of sustainable drainage systems.”

- Delete the reference to main rivers from the footnote on page 140 of chapter 13 and add a definition of “Main Rivers” to the glossary.

- Amend the opening sentences of paragraph 13.29 of the Preferred Options to read: “The manmade coastal defences at Fairhaven Lake and Church Scar (between Ansdell Road South and Lytham Green) have a residual life of less than five years, however, the Pleasure Island defences have a longer residual life… the east end of Lytham at risk. Mitigation measures are set out in detail in the Fylde Coast Protection Strategy”.

- If a flood map is included in the Local Plan, a caveat / footnote should be included which states that the map may not be up-to-date and to check the Environment Agency website for the latest information.

### Policy CL2: Renewable and Low Carbon Energy Generation

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Representations received from:
- English Heritage

09/07/2014 Version 1.5
What you said

English Heritage supported the “impact on the historic environment and assets” in criterion e).

CPRE – Fylde District supported the “cumulative impacts on landscape character and value” in criterion a).

Highways Agency welcomed the consideration of “highway safety and capacity” in criterion h).

BAE Systems Real Estate Solutions supported the “impact on Warton Aerodrome” in criterion g). BAE Systems Real Estate Solutions would support further guidance in relation to this along with a plan showing an exclusion zone for certain developments within proximity to the aerodrome.

Lancashire Wildlife Trust suggested in relation to criteria (c) and (d), that consideration should be given to a reference to bird sensitive areas on the Fylde, as defined in the RSPB / Wildlife Trust document Wind Turbines, Sensitive Bird Populations and Peat Soils: A Spatial Planning Guide for on-shore wind farm developments in Lancashire, Cheshire, Greater Manchester and Merseyside. Reference was also made to sites being functionally linked to the Ribble and Alt Estuaries Special Protection Area in South Fylde and possibly the Morecambe Bay Special Protection Area further north. The cumulative effects need to be considered, both within Fylde and over the border in Preston and Wyre districts.

In relation to paragraph 13.41, Lancashire Wildlife Trust suggested the Local Plan should reflect latest planning policy guidance for shale gas exploration and extraction (hydraulic fracturing) and make Fylde Council’s role in the planning process clear to residents.

In relation to paragraph 13.43, Blackpool Council suggested that it may be helpful to mention in the policy that proposals should use the Lancashire Renewable Energy Study as a guide to their location, giving greater certainty to developers and guiding decision making.

Council response

The Council will liaise with BAE Systems Real Estate Solutions regarding provision of the airport safety exclusion zone for certain developments within proximity to Warton aerodrome.

The Fylde Local Plan Sustainability Appraisal and Habitat Regulations Assessment Screening reports consider the cumulative effects of the Local Plan policies on the Ribble and Alt Estuaries Special Protection Area in South Fylde and the Morecambe Bay Special Protection Area further north. The cumulative impact of the renewable and / or low carbon development within Fylde and beyond will be added to the policy / justification considerations.

The policy justification will be expanded to refer to bird sensitive areas on the Fylde, as defined in the RSPB/Wildlife Trust document Wind Turbines, Sensitive Bird Populations and Peat Soils: A Spatial Planning Guide for on-shore wind farm developments.

The policy justification will refer to the Lancashire Renewable Energy Study to guide proposals, giving greater certainty to developers and guiding decision making.
Shale gas exploration and extraction is dealt with in chapter 1, which clarifies the Council’s role in the planning process. Reference to the County Council’s emerging supplementary planning document on shale gas exploration and extraction will be added to chapter 1.

Recommendations for change

- Add a reference to bird sensitive areas on the Fylde in the policy justification in relation to criteria (c) and (d). Reference also needs to be made to sites being functionally linked to the Ribble and Alt Estuaries Special Protection Area in south Fylde and possibly the Morecambe Bay Special Protection Area further north.
- Add a reference to cumulative impacts in Fylde and over the border in Preston and Wyre in the policy / justification considerations.
- Add a reference in paragraph 13.43 of the Preferred Options document to the Lancashire Renewable Energy Study, to guide developments.
- The Council agrees to make reference to the County Council’s emerging shale gas exploration and extraction supplementary planning document in chapter 1.

Policy CL3: Decentralised Energy Networks and District Heating System

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Representations received from:
- BAE Systems Real Estate Solutions
- A retail developer

What you said

BAE Systems Real Estate Solutions supported this policy aspiration. The policy should refer to the viability and feasibility of schemes in order to deliver decentralised energy supply in line with paragraph 96 of the NPPF. This recommendation was supported by a retail developer.

Council response

The Council agrees to include viability and feasibility of the scheme in the policy, so as to reflect paragraph 96 of the NPPF.

Recommendations for change

- Add the following paragraph at the end of policy CL3: “In determining planning applications, local planning authorities should expect new development to comply
with the adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that it is not feasible or viable and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption”.

Policy CL4: Sustainability Statements

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Representations received from:
- English Heritage
- Environment Agency
- Blackpool Council
- A residential developer

What you said

English Heritage suggested the policy should refer to the historic environment. An additional criteria should be inserted: "Conserve and enhance the significance of a heritage asset and ensuring that any proposals minimise harm to the historic environment”.

The Environment Agency were strongly in support of the policy in relation to mitigating and adapting to climate change and appropriate improvements to sustainability.

A response suggested the policy should be deleted, sustainability statements is unjustifiable and an additional developer constraint. International and National standards are more than suitable to ensure that energy and climatic standards are met.

Blackpool Council commented that this policy requires the submission of a sustainability statement for all major new build and conversion developments. Although HCA national design standards are required for all housing developments through policy H1 of the Preferred Options document, there is no requirement for all minor conversions and non-residential developments.

Council response

The Council intends to delete policy CL4 as the requirements are picked up in the NPPF, but move relevant sections into the design policy in chapter 8. There were also issues about how the Council were going to determine future applications based on applicants submitting a sustainability statement to demonstrate they had considered a range of key sustainability criteria.
Recommendations for change

- Delete policy CL4 as it is picked up in the NPPF, but move relevant criteria from this policy into the design policy (It is also proposed to move the design policy from chapter 14 to become policy GD5 in chapter 8).
Chapter 14: Preserving and Enhancing the Natural and Built Environment

Policy ENV1: Landscape and Biodiversity

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Representations received from:
- Environment Agency
- Campaign to Protect Rural England (CPRE) – Fylde District
- Lancashire Wildlife Trust
- United Utilities
- Blackpool Council
- Lancashire County Council
- 4 residents

What you said

Lancashire Wildlife Trust and Lancashire County Council claimed that the Local Plan does not plan positively for the creation, protection, enhancement and management of networks of biodiversity as required by the NPPF. They said that the Plan does not identify and map local ecological networks, which should take place at the landscape scale across local authority boundaries. Blackpool Council welcomed continued collaboration with the Council to ensure that development that comes forward at the Fylde-Blackpool Periphery considers landscape characteristics and habitats.

Lancashire County Council stated that the identification and mapping of local ecological networks needs to be based on up-to-date information so as to comply with the NPPF (paragraphs 109, 113 and 117), and that Lancashire County Council can provide this information. They also stated that a Lancashire Ecological Framework is being prepared for the County which takes account of the hierarchy of sites. They added that the Local Plan should support this work through the development of a local ecological network at the district level in line with the NPPF.

Lancashire Wildlife Trust commented that parts (c), (d), (e) and (f) seem weak. The Trust added that this criteria needs to be more positive, requiring the enhancement of biodiversity in accordance with the NPPF. They also stated that applicants for development must be required to submit an ecological survey with their planning applications. Lancashire County Council suggested that criterion (e), “where practicable” is ambiguous and fails to adequately address the NPPF.

CPRE – Fylde District claimed that the Lancashire Landscape Character Assessment (2000) is out-of-date. They said that Natural England’s National Character Areas provide a decision making framework for the natural environment.

CPRE – Fylde District said tranquillity is a highly valued characteristic of the English countryside and one of the most important indicators of its quality. They therefore claimed that they would like to see reference to the identification and protection of areas of tranquillity, in compliance with the NPPF.

The Environment Agency supported this policy in relation to aquatic habitats.

<sup>27</sup> Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
United Utilities suggested some alternative wording for policy ENV1.

A resident commented that too much wildlife along with their habitats will be lost to new development, and also that more brownfield sites should be considered. A resident said that the only way to conserve site H13 and to maintain its unique wild character would be to not build on the site. A resident claimed that paragraph 14.4 is a good description of Whyndyke Farm.

A resident expressed support for the views in paragraph 14.18, which summarises some of the key points raised in the earlier “Issues and Options” consultation. The respondent added that there should be a commitment from developers to mitigate the effects on the countryside; and that landscaped buffers should be implemented before development takes place outside settlement boundaries so that the buffer has time to establish itself and become effective.

Council response

The Council acknowledges that the Local Plan needs to plan for biodiversity at the landscape-scale and identify and map components of local ecological networks. The Lancashire wide Ecological Framework has now been prepared and will contribute towards fulfilling this requirement for the Local Plan. The Council will therefore take forward the Lancashire Ecological Framework and use it as a basis to form the local ecological framework for Fylde, which will provide part of the background evidence for the Local Plan.

The Council considers that policy ENV1 needs to be split into two with the landscape issues dealt with in one policy and the biodiversity (nature conservation) issues dealt with in a separate policy, setting out the hierarchy of nature conservation designations and strengthening the existing wording. This will ensure that it will be more effective at minimising impacts on biodiversity. The Council considers that the biodiversity policy should not include the requirement for an ecological assessment to be submitted with a planning application, as this is dealt with in the NPPF and in the national check list.

Natural England have advised the Council that the National Character Area Profiles and the Lancashire Landscape Character Assessment should be considered together. The Lancashire Landscape Character Assessment is a detailed assessment of landscape at the County level, whilst the National Character Area Profiles are more strategic in nature and would sit above the Lancashire Landscape Character Assessment.

The Council recognises that the NPPF requires planning policies to identify and protect areas of tranquillity. The Council will cover areas of tranquillity in the landscape assessment work on the strategic locations for development, which will take place prior to the issuing of the next version of the Local Plan.

There were biodiversity constraints on some of the sites that were considered for inclusion in the Preferred Options document. Where significant harm to biodiversity cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the site was not taken forward in the Preferred Options document.

The Council agrees to add text on nature conservation – i.e. species protection, habitat protection and enhancement to the separate new policy on Biodiversity (nature conservation).

The Council will amend criterion f) of policy ENV1 of the Preferred Options document as suggested by United Utilities.

The Council considers that there is a need to carry out landscape assessment work on the strategic locations for development across the Borough, including landscape buffers, so as to enhance policy ENV1 and assist the Development Management Team when dealing with planning applications.
The Council considers that it could potentially be impractical for all development that would impact upon the countryside to implement a landscaped buffer before development takes place. Rather, it is anticipated that specific requirements, including when the landscaped buffer would be phased, would be considered on a case-by-case basis.

**Recommendations for change**

- Draft a separate new policy solely on Biodiversity, in the next version of the Local Plan, so that policy ENV1 deals entirely with Landscape. The new Biodiversity policy will include the hierarchy of international, national and local designated nature conservation sites, species and habitat protection, habitat enhancement, and the potential for appropriate mitigation.

- Add a new paragraph to the justification text of the new policy on Biodiversity, on the functional ecological network for Lancashire, in the next version of the Local Plan.

- Amend criterion f) of policy ENV1 of the Preferred Options document to read: “Suitable landscape planting should be incorporated within or, where appropriate, close to new development. Measures should be put in place for the management of such landscaping. Specific consideration should be given to how landscaping schemes will minimise the rate of surface water run-off.”

- Make reference in the justification to policy ENV1 (Landscape) to the Lancashire Amounderness Plain National Character Area and use it as part of the evidence base for policy ENV1.

- Add the following text to paragraph 14.4 of the Preferred Options: “The landscape of Fylde contributes to the local distinctiveness of the Borough. The Council will carry out landscape assessment work at the strategic locations for development across the Borough, including the provision of landscape buffers, so as to enhance policy ENV1 and assist the Development Management Team when dealing with planning applications. Development that takes place outside settlements …”

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**Policy ENV2: Protecting Existing Open Space and Green Infrastructure**

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Representations received from:
- English Heritage
- Environment Agency
- Sport England

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28 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
What you said

Sport England suggested separating out the outdoor sports elements into a separate policy possibly to be included within the Health and Wellbeing chapter (chapter 11), to reflect the distinct role and function of outdoor sport with a cross reference from this policy to the outdoor sport policy. In addition, to referring to the requirements of paragraph 74 of the NPPF, paragraph a) of Policy ENV2 of the Preferred Options document should also include “and the findings of any adopted Needs Assessment are met.” This then provides a direct link between what is actually needed in the area and the policy. Sport England’s suggested new policy for inclusion in chapter 11 is set out below:

“In order to provide appropriate indoor and outdoor sports facilities for the communities of Fylde, the Council will:

1. Protect existing indoor and outdoor sports facilities, unless:
   
   Either:
   
   a) They are proven to be surplus to need; or
   
   b) Improved alternative provision will be created in a location well related to the functional requirements of the relocated use and its existing and future users;
   
   And in all cases:

   c) The proposal would not result in the loss of an area important for its amenity or contribution to the character of the area in general; and

2. Support new indoor and outdoor sports facilities where:

   a) They are readily accessible by public transport, walking and cycling; and

   b) The proposed facilities are of a type and scale appropriate to the size of the settlement; and

   c) Where they are listed in an action plan in any emerging or subsequently adopted Playing Pitch Strategy or Indoor Sports Strategy, subject to the criteria in the policy.

3. Make sure that major residential developments contribute, through land assembly and financial contributions, to new or improved sports facilities where development will increase demand and / or there is a recognised shortage.”

Lancashire Sport Partnership Ltd questioned what the evidence was for the statement in paragraph 14.25 that “there are deficiencies in the green infrastructure network in Fylde”. As the Open Space and Recreation Study, 2008, is more than 3 years old it will need to be updated. Lancashire Sport Partnership also queried criterion d) in policy ENV2 of the Preferred Options document, regarding what would the Council base an adequate area of school playing field on? Lancashire Sport Partnership assumed that, if the Playing Pitch Strategy indicates there is a deficiency in open space and pitches that any loss of playing pitches would be replaced like for like or appropriate other space provided, and not just accept what might be left over after a school has been extended. In paragraph 14.31 it says that there will be a review of evidence on open space including pitches for preparation of Local Plan Part 2. Lancashire Sport Partnership is concerned that it could take 12 months to write a new playing pitch strategy.

English Heritage suggested that criterion (b) and paragraph 14.27 should be omitted from this policy and addressed in policy ENV5 (Heritage Assets) of the Preferred Options document. They said that the assessment of the impact of a development proposal on a registered park and garden, should relate to the requirements of paragraph 132 of the NPPF, and that criterion (b) should be amended to reflect the wording and be incorporated into policy ENV5 of the Preferred Options document.

English Heritage also claimed that there needs to be a proper assessment of registered Historic Parks and Gardens and that this should be identified in the Spatial Portrait of Fylde and the area descriptions. They also suggested that ENV2 of the Preferred Options document would benefit by referencing the designated parks and gardens as part of the existing green infrastructure.
The Environment Agency supported this policy. CPRE – Fylde District commended the protection to be given to the open space network in this policy. However, they said that there should be reference to the Hedgerows Regulations 1997 in the policy.

Kirkham Grammar School claimed that criterion (d) in policy ENV2 of the Preferred Options document does not accord with the exceptions in paragraph 74 of the NPPF.

A resident said that green infrastructure should have biodiversity value. Another resident claimed that the policy does not protect greenfield land and farmland, and that the Preferred Options document allocates sites on greenfield land.

Council response

The Council agrees with Sport England’s suggestion to separate out the outdoor sports elements from policy ENV2 of the Preferred Options document and to create an additional policy on indoor and outdoor sports facilities, to be included within the Health and Wellbeing chapter (chapter 11). The Council also agrees to refer in paragraph a) of Policy ENV2 of the Preferred Options document to “the findings of any adopted Needs Assessment are met.”

The reference in paragraph 14.25 to deficiencies in the green infrastructure network is derived from the Open Space and Recreation Study, 2008. The Council agrees with Lancashire Sport Partnership Ltd that, as the Study is more than 3 years old, it will need to be updated. The Council agrees with Lancashire Sport Partnership’s assumption over criterion d) of policy ENV2 of the Preferred Options document that, if the Playing Pitch Strategy indicates there is a deficiency in open space and pitches, that any loss of playing pitches would be replaced like for like or appropriate other space provided. The Council considers that reference in paragraph 14.31 to a review of evidence on open space including pitches for preparation of Local Plan Part 2, should be retained. It could take up to 12 months to write a new playing pitch strategy, however the Council is considering updating the strategy in accordance with advice provided by Sport England, which should take considerably less time.

The Council will amend the Local Plan so that registered Historic Parks and Gardens are referenced in policy ENV5 (Heritage Assets) of the Preferred Options document rather than in policy ENV2 (Protecting Existing Open Space and Green Infrastructure). In addition, paragraph 14.27 referring to Historic Parks and Gardens will be omitted from chapter 14. The Council will also ensure that this part of the policy better aligns with the requirements of paragraph 132 of the NPPF.

The Council does not have the resources to undertake an assessment of registered Historic Parks and Gardens within the timescales of the preparation of the Local Plan. The Council will include reference to registered Historic Parks and Gardens in the Spatial Portrait of Fylde in chapter 2.

Hedgerows are referenced in policy ENV1. The Council does not consider it necessary to include this again in policy ENV2 of the Preferred Options document.

The Council will ensure that criterion (d) is amended so that it better aligns with paragraph 74 of the NPPF.

Recommendations for change

- Amend criterion a) to read: “Existing public open space, including sports and playing pitches, will be protected unless the requirements of paragraph 74 of the NPPF and the findings of any published needs assessment are met.”
- Remove the references to Registered Historic Parks and Gardens from criterion b) of policy ENV2 of the Preferred Options document and move to policy ENV5 ‘Heritage Assets’. Following the removal of the references to Registered Historic Parks and Gardens from criterion b), re-number the subsequent criteria c) to f) as b) to e).

- Ensure that the policy wording for policy ENV5 of the Preferred Options document relating to registered Historic Parks and Gardens better aligns with paragraph 132 of the NPPF. Delete paragraph 14.27, which refers to registered Historic Parks and Gardens from ENV2 of the Preferred Options document and move the text to paragraph 14.56 and subsequent paragraphs, which introduces Policy ENV5 (Heritage Assets). Following the deletion of existing paragraph 14.27, re-number the subsequent paragraphs.

- Amend criterion (d) of policy ENV2 of the Preferred Options document so that it reads: “Development that results in the loss of existing open space or sports and recreation facilities (including playing fields) will only be permitted if one of the following criteria are met:
  i. The open space has been identified by the Council as being unsuitable for retention because it is under used, poor quality or poorly located;
  ii. 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
  iii. Successful mitigation takes place and alternative provision is provided in the same locality, on a like for like basis.”

- Add a new policy on indoor and outdoor sports facilities in chapter 11 (Health and Wellbeing).

- Update the Open Space and Recreation Study, 2008 and the Playing Pitch Strategy.

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**Policy ENV3: Provision of Open Space and Green Infrastructure**

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Representations received from:
- English Heritage
- Sport England
- Lancashire Sport Partnership Ltd
- Home Builders Federation
- Blackpool Council
- 1 resident
- 1 residential developer

**What you said**

Blackpool Council welcomed reference to cross boundary working. They said that a co-ordinated approach should be taken at the Fylde-Blackpool Periphery to enable the integration and linkage of any proposed green infrastructure and open space within existing green infrastructure networks in Blackpool and Fylde.
Blackpool Council suggested that reference to “financial contributions will be sought through the Community Infrastructure Levy” would seem to prejudge the outcome of the Viability Assessment as to whether Community Infrastructure Levy is viable and is to be implemented by the Council.

Sport England claimed that it was not clear whether policy ENV3 of the Preferred Options document includes outdoor sports facilities. If it does, the standards are unworkable for pitch / court provision. Developer contributions / commuted sums should be obtained in accordance with the Playing Pitch Strategy action plan.

Lancashire Sport Partnership Ltd questioned whether the reference in policy ENV3 of the Preferred Options document to ‘facilities for children’s play’ related to playgrounds and Multi-Use Games area(s). The reference in paragraph 14.32 to the Open Space, Sport and Recreation Study 2008 may need to be amended if the Study is updated. In paragraph 14.34, there is a reference to ‘close to’. What does ‘close to’ mean? Will this be based on travel time, walking distance and is this open to interpretation? Lancashire Sport Partnership Ltd highlighted the reference in paragraph 14.46 for a Playing Pitch Strategy to support decisions on supply and demand and support decisions on need particularly around new developments and any potential loss of playing fields.

Lancashire Sport Partnership Ltd highlighted the reference in paragraph 14.46 for a Playing Pitch Strategy to support decisions on supply and demand and support decisions on need particularly around new developments and any potential loss of playing fields.

English Heritage claimed that there needs to be a proper assessment of Lytham Hall and its surrounding historic park and garden and associated listed buildings, and that these should be identified in the Spatial Portrait of Fylde and the area descriptions.

A residential developer disagreed with the requirement in the policy to double the public open space required on developments of 100 dwellings or more. They added that this requirement has not been supported by an up-to-date assessment of open space provision in the Borough. The respondent suggested that there should be flexibility in the policy for the developer to Masterplan the public open space, as each site has its individual characteristics and constraints, and there are differing levels of existing open space provision in each area.

The resident added that having a default requirement to provide double the normal open space on larger developments will constrain the design of schemes and have the potential to increase densities and lower private garden spaces on sites constrained by natural influences such as woodlands and water bodies; and that this approach is also not compliant with Community Infrastructure Levy, Regulation 122, and needs viability testing.

The Home Builders Federation claimed that the policy had not been positively prepared and was therefore unsound. They said that the policy does not identify how the Council will deal with applications where there is an identified over-provision of open space. They added that in areas where there is an identified surplus of open space, developers should not be required to provide a contribution towards open space unless it can be evidenced that the development would, in itself, create a need taking account of the existing surplus. They added that this needs to be based on an up-to-date Open Space Study and Viability Testing.

The Home Builders Federation suggested that the costs associated with the requirement for open space provision need to be considered as part of an economic viability assessment of all plan policies and obligations. A resident said that green infrastructure should have biodiversity value.

**Council response**

The Council does not agree that larger developments should have the flexibility to Masterplan public open space as the site determines, rather than having a default requirement. The policy allows the payment of a commuted sum to help provide additional or improved open space nearby, where it is agreed with the Council that the open space would be better provided off-site.
The Council agrees that the policy needs to be informed by an up-to-date Open Space Assessment. It is anticipated that an up-to-date Open Space, Sport and Recreation Study will inform the policy at the Local Plan – Publication stage. The Council agrees that the policy should identify how the Council will deal with applications where there is an identified over-provision of open space.

The Council agrees that the policy needs to be subjected to viability testing. A Viability Assessment has been undertaken on the Local Plan – Preferred Options document since it was published for consultation, and it is anticipated that further viability testing will take place before Publication. The findings of the viability testing will inform any required changes to the policy.

The Council agrees with Sport England that, as currently worded, it is not clear whether policy ENV3 of the Preferred Options document includes outdoor sports facilities. The Council agrees to clarify the wording in Policy ENV3 on open space and infrastructure and to create a separate, additional policy on indoor and outdoor sports facilities, which will be included within the Health and Wellbeing chapter (chapter 11) of the next version of the Local Plan.

The Council agrees with Lancashire Sport Partnership Ltd that the reference in policy ENV3 of the Preferred Options document to “facilities for children’s play” relates to playgrounds and Multi-Use Games Area(s) and that this should be clearly set out in the policy. The Council agrees to amend the reference in paragraph 14.32 to the Open Space, Sport and Recreation Study 2008 when the Study has been updated. The Council agrees that the reference in paragraph 14.34 to “close to”, is open to interpretation and it should be deleted. The Council agrees with Lancashire Sport Partnership Ltd over the need for an up-to-date Playing Pitch Strategy, as part of the evidence base to the Local Plan.

The Council agrees with Blackpool Council that the reference in policy ENV3 of the Preferred Options document to “financial contributions will be sought through the Community Infrastructure Levy”, would seem to prejudge the outcome of the Viability Assessment as to whether Community Infrastructure Levy is viable and is to be implemented by the Council. However, it is considered that the wording should be retained and be carried forward in the policy in the next version of the Local Plan, if the viability testing resolves that Community Infrastructure Levy is viable and allows the implementation of the Levy.

The Council agrees that further cross-boundary working with Blackpool Council (and Wyre Council) will be required so as to enable the development of a strategic network of green infrastructure across the Fylde Coast. This would be achieved by adding a new paragraph at the end of policy ENV3 of the Preferred Options document referring to cross-boundary working.

Recommendations for change

- Amend part of the first sentence of policy ENV3 of the Preferred Options document to read “… the provision of amenity open space with facilities for children’s play (i.e. playgrounds and Multi Use Games Areas), where appropriate, will be required to the following minimum standards:”

- The policy will be amended to ensure that policy ENV3 of the Preferred Options document identifies how the Council will deal with applications where there is an identified over-provision of open space.

- Add a new sentence at the end of policy ENV3 of the Preferred Options document saying: “Further cross boundary working will be required so as to enable the development, delivery and implementation of a strategic network of green infrastructure (including green space and blue space) across the Fylde Coast”.

- Draft a separate, additional policy on indoor and outdoor sports facilities, to be included within the Health and Wellbeing chapter (chapter 11) of the next version of the Local Plan.
Amend the second sentence of paragraph 14.34 to read: “Where provision is made off-site, it should be in a location close to, and where it would be of direct benefit to, the occupiers of the new development.”

Policy ENV4: Management and Enhancement of Open Space and Green Infrastructure

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Representations received from:
- Campaign to Protect Rural England (CPRE) – Fylde District
- Environment Agency
- Lancashire Wildlife Trust
- BAE Systems Real Estate Solutions
- Blackpool Council

What you said

The Environment Agency supported this policy, saying that it could facilitate funding for green infrastructure management.

Blackpool Council suggested that reference to “financial contributions will be sought through the Community Infrastructure Levy” would seem to prejudge the outcome of the Viability Assessment as to whether Community Infrastructure Levy is viable and is to be implemented by the Council.

BAE Systems Real Estate Solutions supported the proposal for the Coastal Parkway, and would wish proposals for this initiative to be aligned with the operational requirements of Warton Aerodrome.

CPRE – Fylde District said that they commended the protection to be given to the existing open space network in Fylde.

Lancashire Wildlife Trust welcomed the proposed use of the Community Infrastructure Levy for the management of green infrastructure, although they said that much would depend upon the Community Infrastructure Levy rate applied to various forms of development and on the Council’s priorities. Lancashire Wildlife Trust commented that they would be very surprised if the Community Infrastructure Levy would produce sufficient finance for green infrastructure, therefore there could be a need to include other forms of funding e.g. s106 agreements (while still available). They added that such management agreements would need to be tied into some form of legal agreement which should be able to require payment.

Council response

Comments in relation to the Coastal Parkway Masterplan and alignment with the operational requirements of Warton Aerodrome have been forwarded to the Leisure, Culture and Sport Department at Fylde Borough Council, which is preparing the masterplan.

The Council agrees with Blackpool Council that the reference in the Preferred Options document to “financial contributions will be sought through the Community Infrastructure Levy” would seem to prejudge
the outcome of the Viability Assessment as to whether Community Infrastructure Levy is viable and is to be implemented by the Council. However, it is considered that the wording should be retained and be carried forward in the policy in the next version of the Local Plan if the viability testing resolves that Community Infrastructure Levy is viable.

The Council agrees that further sources of funding for green infrastructure should be referenced in the policy and / or justification.

Recommendations for change

- Amend the first sentence of policy ENV4 of the Preferred Options document to read: “Financial contributions will be sought through the Community Infrastructure Levy and consideration will be given to further sources of funding for the management and enhancement of open space and green infrastructure, including the Ribble Coast and Wetlands and the Coastal Parkway”.

Policy ENV5: Heritage Assets

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<td>English Heritage</td>
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<tr>
<td>Lancashire Wildlife Trust</td>
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<tr>
<td>Lytham St Annes Civic Society</td>
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What you said

Ribby with Wrea Parish Council generally agreed with the Preferred Options version of the Local Plan and fully supported the protection of heritage aspects, rural ambience / landscape character.

English Heritage suggested the section title should be amended to read “Preserving and Enhancing the Historic and Built Environment and Achieving Good Design.” The historic environment should be considered in delivering a number of other planning objectives.

English Heritage disagreed with paragraph 14.52 as there has been no proper, accurate assessment of the significance of the historic environment in the area and the contribution it makes to the Borough (NPPF, paragraph 169). This is reflected throughout the Plan. The Plan needs to be expanded to explicitly detail the heritage assets and historic environment in the Borough and make an assessment of their contribution to the area. This will then inform this policy.

Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
English Heritage commented that there has been no proper accurate assessment of the significance of the heritage assets in the area and the contribution they make to the Borough (NPPF, paragraph 169) within the Plan. Paragraph 14.56 is the first time that any attempt to detail the historic environment in the Borough has been made.

English Heritage welcomed the list of assets in the area. This paragraph should be amended to accurately detail the historic assets in Fylde, i.e.:

“Listed buildings – 197
Grade I – 1
Grade II* - 5
Grade II – 191
Registered Parks and Gardens – 3
Scheduled monuments – 0
Conservation Areas – 10
Building at Risk – 1
There is also the potential for undesignated archaeological sites”.

English Heritage welcomed the recognition in paragraph 14.54 (although late in the Plan) that “Fylde boasts a rich and varied built environment including sites and buildings of historic and architectural interest.” English Heritage claimed that there has been no proper, accurate assessment of the significance of the heritage in the area and the contribution they make to the Borough (NPPF, paragraph 169). English Heritage went on to claim that the Plan has failed to do this and therefore, as this has not been undertaken it would not reinforce the statement made in this paragraph that they “make a valuable contribution to economic and social wellbeing as well as providing a focus for heritage-led regeneration and tourism development”. English Heritage suggested that this needs to be reflected also in the relevant policies in the Local Plan.

English Heritage commented that the Local Plan needs to be expanded to explicitly detail the heritage assets and historic environment in the Borough and make an assessment of their contribution to the area. English Heritage claim that this will then inform policy ENV5 of the Preferred Options document.

English Heritage suggested that whilst there was nothing wrong with relying on the provisions of the NPPF, this does not accord particularly well with the approach which is being advocated within the NPPF – that the planning system should be plan-led. Indeed there appears to be an expectation within the NPPF that, with a compliant plan in place, there will be no need for those using it to have to look again at the NPPF in making decisions on development proposals (see, for example NPPF, paragraph 14).

English Heritage suggested that as drafted, policy ENV5 of the Preferred Options document does not expand a great deal upon national policy guidance as set out in the NPPF. Consequently, English Heritage claimed that policy ENV5 does not provide sufficient detailed guidance to enable those proposing schemes likely to affect Fylde’s heritage assets to determine their likely degree of success. Nor does it greatly help those determining such schemes to understand what considerations should be taken into account in reaching a decision about the appropriateness of the development proposals.

As a result, English Heritage suggested that Policy ENV5 of the Preferred Options document, does not comply with the requirements of the NPPF. It does not provide any certainty about how planning applications on planning proposals will be determined (NPPF, paragraph 17); it is not made clear how the presumption in favour of sustainable development will be applied locally in terms of the historic environment (NPPF, paragraph 15); and it does not provide clear policies on what will or will not be permitted or provide a clear indication of how a decision-maker should react to a proposal (NPPF, paragraph 154).

English Heritage suggested rewording policy ENV5 of the Preferred Options document including the following elements: a clear explanation of the considerations and approach to development proposals affecting each of the different heritage types, including locally-important heritage assets. A clear statement
of the approach and requirements for proposals affecting nationally important archaeology, and other archaeological remains.

English Heritage set out the following wording of a possible Policy:

“Proposals for development should protect and, where appropriate, enhance or better reveal those elements which contribute to the significance of the Borough’s heritage assets:

Conservation Areas
Proposals affecting a Conservation Area should preserve or enhance those elements that have been identified in the respective Conservation Area Appraisal as making a positive contribution to their special character or appearance. Demolition or other substantial loss to the significance of a building or feature that contributes positively to the Conservation Area will be permitted only where this harm is outweighed by the public benefits of the proposal. Development that would result in harm to a public or private open space that contributes positively to the character of a Conservation Area will be permitted only where this harm is outweighed by the public benefits of the proposal.

Historic Parks and Gardens
Proposals affecting a Historic Park and Garden should ensure that development does not detract from the enjoyment, layout, design, character, appearance or setting of that landscape, cause harm to key views from or towards these landscapes or, where appropriate, prejudice their future restoration.

Archaeological remains
Development which would result in harm to the significance of a nationally-important archaeological site will not be permitted. The preservation of other of archaeological sites will be an important consideration. When development affecting such sites is acceptable in principle, the Council will seek to ensure mitigation of damage through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavating and recording before or during development (NB. Scheduled Monuments have been excluded as the Borough does not have any).

Listed Buildings
Listed Buildings and their settings will be preserved and, where appropriate, enhanced. Loss of any significance should be minimised, and will be permitted only where any harm is justified by the public benefits of the proposal. The total or substantial demolition of a listed building will be permitted only in exceptional circumstances.

Locally-important heritage assets
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 where the public benefits of development would outweigh the harm”.

Lancashire Wildlife Trust commented that the natural environment is excluded from the policy; and that some heritage assets also coincide with natural environment assets.

Lytham St Anne's Civic Society supported the need for stronger and enforceable regulations relating to Conservation Areas and Listed Buildings. The Civic Society claimed that a high standard of design should be enforced in all areas and we should not lose significant heritage buildings in Conservation Areas.

Council response

The Council agrees with English Heritage that the section title should be amended to include the “Historic Environment”.

In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be achieved. The Heritage Strategy sets out a strategic
framework for future heritage works streams, including a statement of intent to undertake conservation area appraisals and management plans where relevant.

The Council agrees with English Heritage that paragraph 14.56 of the Preferred Options document should be amended to accurately detail the Listed Buildings in Fylde, i.e.:

Listed buildings – 197
Grade I – 1
Grade II* - 5
Grade II – 191
Building(s) at Risk – 1

The Council agrees with English Heritage to insert additional text in chapter 14 on the heritage assets of Fylde including Listed Buildings, Conservation Areas, Registered Parks and Gardens, scheduled monuments and undesignated archaeological sites.

The Council agrees to replace the text in policy ENV5 of the Preferred Options document taking into consideration the wording proposed by English Heritage, which sets out the Borough’s heritage assets and focusses on them in turn, i.e. Listed Buildings, Conservation Areas, archaeological remains, and locally important heritage assets.

The Council considers that there is no need to add ‘Natural Environment’ into the section title as policy ENV5 deals with heritage assets, i.e. the Historic and Built Environment. The Natural Environment will be dealt with in an additional new policy (‘Biodiversity’). The Council considers it sufficient for Natural Environment to be referred to in the title to chapter 14.

The Council agrees to make reference to the Lancaster Canal in policy ENV5 of the Preferred Options document, as it is an important heritage asset, which runs through part of Fylde and requires protection.

Recommendations for change

- Amend the sub-section title to read: “Preserving and Enhancing the Historic and the Built Environment”.

- Amend paragraphs 14.55 and 14.56 of the Preferred Options document to deal solely with Listed Buildings and to read: “Listed Buildings are protected by legislation and English Heritage keeps an up-to-date register of all listed buildings and those at risk. Fylde contains 197 Listed Buildings (of which one is Grade I, five are Grade II* and 191 are Grade II). The one Grade I Listed Building in the Borough is on the English Heritage Building at Risk register.”

- Insert additional text in the introductory text and the justification to policy ENV5 of the Preferred Options document in chapter 14 on the heritage assets of Fylde including: Listed Buildings, Conservation Areas, Registered Historic Parks and Gardens, scheduled ancient monuments and undesignated archaeological sites.

- Insert additional text in the introductory text and the justification to policy ENV5 of the Preferred Options document referring to a local list of buildings, heritage statements, the importance of the public realm and cross boundary working on heritage issues.

- Redraft policy ENV5 of the Preferred Options document to reflect English Heritage’s concerns.

- Include a reference to the Lancaster Canal in policy ENV5 of the Preferred Options document.
Policy ENV6: Good Design in New Development

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Representations received from:
- English Heritage
- Environment Agency
- Home Builders Federation
- Lancashire Wildlife Trust
- Lytham St Annes Civic Society
- 2 residential developers

What you said

The Environment Agency supported the policy as it will secure landscape provision and public open space, creating new green infrastructure resources.

English Heritage welcomed the inclusion of the policy and suggested a wording alteration to criterion (b) to reflect NPPF: “Safeguarding and enhancing” should be amended to read “conserve and enhance”.

Lancashire Wildlife Trust suggested criterion (h) of policy ENV6 should be strengthened to include protecting and enhancing existing habitats and providing linkages to the wider ecological networks.

Lytham St Annes Civic Society raised a number of concerns, mainly that the new built environment is not given sufficient prominence in the Local Plan. The need for housing may override other considerations with design and density suffering. The Civic Society referred to key local character, including symmetrical terraces, usually with distinctive central and end houses which is ignored when extensions and porches are permitted. Rear access roads to allow discreet parking and rubbish collection was also mentioned. A key local developer uses the same housing type on its sites with little respect paid to local character in larger developments. The Civic Society also commented on development being built closely together with little green space or tree cover.

The Civic Society also raised the following issues: affordable housing becoming increasingly smaller; open space on certain new estates is fenced-off or is a lake; new developments are littered with cars; and developments are built closely together with little green space or tree cover.

The viability of the policy was questioned by the Home Builders Federation and a residential developer who then concluded that the policy was unjustified and unsound. The Home Builders Federation suggested the policy should be considered as part of a viability assessment of the plan as a whole.

The Home Builders Federation and a residential developer suggested that the policy largely replicated other policies within the Local Plan e.g. H1, ENV1 and ENV5 of the Preferred Options document. The Home Builders Federation claimed there was a conflict between criteria (e) and policy H1, requiring higher densities in areas with good transport.

The Home Builders Federation and a residential developer suggested criteria (j) of the policy should encourage developers and not be mandatory.
A residential developer opposed reference to no development being permitted within Flood Risk Zones 2 and 3, arguing that some development is suitable in Flood Risk Zones 2 and 3 and the Sequential and Exceptions Test in NPPF Technical Guidance should be used to determine the appropriateness of each individual development and its location in regards to flood risk issues. The residential developer also suggested that the policy seems to conflict with policy CL1.

Another residential developer considered that if a site is located within Flood Risk Zone 2 or 3, they should not be included in the plan. They recommended the identification of alternative sites, and that consideration should be given to including allocations within rural villages.

**Council response**

The Council agrees to the amendments suggested by English Heritage and the strengthening of the policy wording by Lancashire Wildlife Trust.

The Council agrees with Lytham St Annes Civic Society that the built and natural environment should be given greater prominence in the Local Plan and consequently it is considered necessary and appropriate to move the design policy (policy ENV6) up to chapter 8 – General Development Policies, to become the new policy GD5 in the next version. In addition, the Council considers that an additional criterion should be added to the policy to address the Civic Society’s concerns about the quality of developments to ensure that the opportunity is taken for developments to make a positive contribution to the character and local distinctiveness of the area through high quality design, which responds to its context.

A viability study of the Local Plan Preferred Options document has been completed and submitted to the Council. This looks at the viability of all emerging policies and the Local Plan as a whole. The findings will feed into the Local Plan (Part 1).

The Council will look to resolve any policy conflicts and/or omissions prior to issuing the next version of the Local Plan.

Comments in relation to excluding strategic sites in Flood Risk Zones 2 or 3 are dealt with in policy SD1 in chapter 6.

The Environment Agency’s recommended wording for policy SD1 in chapter 6, suggesting that some development is appropriate in Flood Risk Zones 2 or 3 is also recommended for inclusion in policy ENV6 of the Preferred Options document, so as to resolve the residential developers concern with this policy and ensure consistent wording throughout the Local Plan.

The Council agrees with the residential developer that the last sentence of policy ENV6 of the Preferred Options document conflicts with policy CL1, regarding development in Flood Risk Zone 2 or 3. The Council will amend the policy accordingly.

The Home Builders Federation and a residential developer suggested criterion (j) of the policy should encourage developers and not be mandatory. The DCLG is currently carrying out a review of Housing Standards, which includes the Building for Life 12 standards and it is highly probable that all of the standards will be removed from the Planning system and will be dealt with by Building Regulations. Consequently, the Council agrees with the Home Builders Federation.

The Council is proposing to delete policy CL4 on Sustainability Statements from chapter 13 as it is picked up in the NPPF, but to retain 2 criteria from this policy and add them to policy ENV6 of the Preferred Options document. The 2 criteria are:

- “Reduce energy consumption through energy efficiency measures;
- Install renewable and low-carbon energy generation technology.”
The Council considers that policy ENV6 of the Preferred Options document, which will be moved into the General Development chapter and become policy GD5 in the next version of the Local Plan, should also refer to good design in highways and infrastructure projects. The following new criterion should be added to the policy: “The layout, design and landscaping of all elements of the proposal, including any internal roads, car parking, footpaths and open spaces, are of a high quality and respect the character of the site and local area.”

**Recommendations for change**

- Move policy ENV6 and its supporting text / justification up to chapter 8 (General Development Policies) to become policy GD5 in the next version of the Local Plan.

- Delete the word “New” from the title of policy ENV6 and from the sub-heading that precedes the policy. The text should read “Good Design in Development”. The first paragraph of the policy will also be amended to read: “Development will be expected to be of a high standard of design…”

- Amend criterion (b) of policy ENV6 of the Preferred Options document to read ‘Conserving and enhancing the built and historic environment’.

- Amend criterion (h) to read: “Providing landscaping as an integral part of the development, protecting existing landscape features and natural assets, protecting and enhancing habitats, and providing linkages to the wider ecological networks, providing open space and enhancing the public realm”.

- Amend criterion j) to read: “Encouraging developers to conform to Building for Life 12 standards for well-designed homes and neighbourhoods”.

- Add a new criterion: “Taking the opportunity to make a positive contribution to the character and local distinctiveness of the area through high quality new design that responds to its context.”

- Add the following new criterion in policy ENV6 of the Preferred Options document: “The layout, design and landscaping of all elements of the proposal, including any internal roads, car parking, footpaths and open spaces, are of a high quality and respect the character of the site and local area;”

- Add a new criterion to policy ENV6 of the Preferred Options document: “The development should not prejudice highway safety, pedestrian safety, the free flow of traffic, and would not reduce the number of on-site parking spaces to below the standards stated in policy T4 - Parking Standards, unless there are other material considerations which justify the reduction. Any new roads and / or pavements provided as part of the development should be constructed to an adoptable standard;”

- Add the following criterion to policy ENV6 of the Preferred Options document from policy CL4 (It is proposed to delete policy CL4 as the issues are covered in the NPPF): “Measures to improve the energy performance of buildings will be encouraged in accordance with the following hierarchy: a) Reduce energy consumption through energy efficiency measures. b) Install renewable and low-carbon energy generation technology.”

- Amend the last sentence of the policy to read “Inappropriate development in Flood Risk Zones 2 or 3 should be avoided”.

09/07/2014 Version 1.5
Chapter 15: Next Steps

Chapter 15 General Comments:

<table>
<thead>
<tr>
<th>Number of representations:</th>
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<tbody>
<tr>
<td><strong>Comment</strong></td>
</tr>
<tr>
<td>2</td>
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</table>

Representations received from:
- AXA Insurance
- 1 resident

What you said

AXA Insurance welcomed the opportunity to comment on the Preferred Options document. They embraced the Local Plan process and supported the delivery of more housing within Fylde.

A resident suggested the need for regeneration / landscaping scheme at the Warton shopping parade would provide a focus to the centre. Chequers social club and offices were suggested for retail and community facilities. A masterplan for Warton is needed with higher quality design for new development and public realm. Cycling routes were suggested by the resident, linking Warton to Wrea Green.

Council response

Comments from AXA Insurance are noted.

Comments in relation to the regeneration / landscaping needs of Warton are dealt with under Policy SL3 in chapter 7.

Recommendations for change

- None
Glossary and Appendices

Glossary General Comments:

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<tr>
<th>Number of representations:</th>
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</table>

Representations received from:

- Environment Agency
- The Theatres Trust
- Treales, Roseacre and Wharles Parish Council
- Lytham St Annes Civic Society

What you said

The Environment Agency recommended amending the definition of the exception test to read: “If, following the application of the Sequential Test, it is not possible for development to be located in zones with a lower probability of flooding, the exception test should be applied if necessary”.

The Environment Agency also suggested the inclusion of a definition of “Main River” watercourses in the glossary to ensure that people are aware of what this means and that separate legislative controls will apply to these watercourse. The definition to read: “Main Rivers, under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the main river watercourse”.

The Theatres Trust supported the inclusion of “community facilities” in the glossary. They suggested a more succinct description and recommended: “community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community”. The improved description in the glossary would remove the need to define community facilities in policies INF1 and INF2.

Treales, Roseacre and Wharles Parish Council suggested “rural worker” should be defined.

Lytham St Annes Civic Society referred to three definitions of “sustainability” in the glossary and suggested these are omitted and a true description of what is really meant is used instead.

Council response

The Council agrees to the alternative definition of “community facilities” as suggested by The Theatres Trust. The reference to “community facilities” in policies INF1 and INF2 will be rationalised to refer to the amended definition in the glossary.
The Council agrees to the alternative definition of the exception test and the inclusion of “Main Rivers” in the glossary as suggested by the Environment Agency.

The glossary includes a definition of “Sustainability Appraisal”, “Sustainability Statements” and “Sustainable Development”. It is not possible to rationalise this into one definition as it refers to three separate aspects of sustainability.

**Recommendations for change**

- Amend the definition of exception test to read: “If, following the application of the Sequential Test, it is not possible for development to be located in zones with a lower probability of flooding, the exception test should be applied if necessary”.

- Amend the definition of community facilities to read: “community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.”

- Rationalise the definition of “community facilities” in policies INF1 and INF2 to refer to the amended definition set out above.

- Add the following definition of an integral garage in the Glossary: “An integral garage is a building for parking vehicles, attached to another building, such as a house. Typically, integral garages have three walls, a roof and a door opening large enough for vehicles to enter the building. Select integral garages also have doorways from the garage to the connecting building.”

- Add “Main Rivers” to glossary to read: “Main Rivers, under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the main river watercourse”.

- Delete the definition of Main Rivers from the footnote on page 140 of chapter 13 of the Preferred Options document.
Appendix 1: Schedule of saved Fylde Borough Local Plan (FBLP) policies

<table>
<thead>
<tr>
<th>Number of representations:</th>
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<td></td>
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<td>Comment</td>
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</table>

Representations received from:

- Treales, Roseacre and Wharles Parish Council

What you said

Treales, Roseacre and Wharles Parish Council queried the replacement of certain policies:

- Policy EC3 and H6 are complete replacements for SP10, SP11, SP12, SP13 – Agricultural Workers Dwellings, Rural Business Set Up.
- Policy H6 is a complete replacement for policy SP14.
- Policy HL4 is a complete replacement for policy H5.

Council response

In response to the comments made by Treales, Roseacre and Wharles Parish Council, the Council has drafted a number of policies (policies EC3 and H6 in the Preferred Options document), which take forward issues covered by policies from the existing Fylde Borough Local Plan (as altered) in October 2005, so as to ensure that there are robust, flexible and up-to-date policies in place in the new Local Plan (Part 1), which will replace the existing Local Plan. Development Management officers will need robust policies in the development plan for dealing with planning applications for agricultural workers dwellings (covered in the existing Local Plan under policies SP10, SP11 and SP12), and stables and equestrian centres, kennels and catteries (covered in the existing Local Plan in policy SP13). Policy H6 of the Preferred Options document takes forward parts of policy SP14 (special needs dwellings) and policy HL4 (enlargement and replacement of rural dwellings) from the existing Local Plan, which will be replaced in part by the new Local Plan (Part 1). Similarly, policy H5 of the Preferred Options document takes forward policy HL4 (enlargement and replacement of rural dwellings), but also focusses on and provides criteria for determining applications for the development of isolated new homes in the countryside.

Recommendations for change

- Amend the reference under contaminated land to read: “paragraphs 120 and 121” of the NPPF.
Appendix 2: Development of the Spatial Option and Strategic Sites Assessment

<table>
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<td>Comment</td>
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</table>

Representations received from:

- Home Builders Federation
- BAE Systems Real Estate Solutions
- Treales, Roseacre and Wharles Parish Council
- Bryning with Warton Parish Council
- Councillor Brickles
- 10 Residents
- 1 residential developer

What you said

Additional suggested sites

Table of additional suggested sites

<table>
<thead>
<tr>
<th>Suggested Site</th>
<th>Specific comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. AXA Insurance</td>
<td>Claimed that they own land that is deliverable and developable and are willing to bring this land forward for housing. AXA Insurance supported the need to bring forward housing, but that they believe the strategy for Lytham St Annes is flawed as it does not allow for a range and choice of sites and focuses too much development in one location. They gave the view that the SHLAA has incorrectly assessed the deliverability of this site.</td>
</tr>
<tr>
<td>2. Land West of Leech lane St Annes (7.60 Ha)</td>
<td>A mixed use developer suggested a site at Leach Lane, St Annes. The need to allocate additional housing sites in sustainable locations would justify the removal of the site from the Green Belt. BBP2 commented that although the Plan allocates sites in the Lytham St Annes area, they consider that this is not likely to be sufficient to meet this area’s needs, and will therefore require the release of sustainable Green Belt land. They suggested that BBP2’s site on the edge of St Annes is a sustainable site which could be released for housing without harming the Green Belt.</td>
</tr>
</tbody>
</table>

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30 Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
<table>
<thead>
<tr>
<th><strong>3. Blackpool FC Training Ground, Martin Avenue, Lytham St Annes (2.61Ha)</strong></th>
<th>Further site suggested at Blackpool Football Club Training Ground, (by consultants)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4. Victoria Hotel, Church Road, Lytham St Annes (0.23Ha)</strong></td>
<td>A residential developer suggested the inclusion of a site adjacent to Church Road and amendment of the Green Belt boundary at this location which would provide a logical extension to the urban area and a realistic, sensible and long-term Green Belt boundary.</td>
</tr>
<tr>
<td><strong>5. Land North and West of Clifton (7.20Ha)</strong></td>
<td>A residential developer suggested two sites at Clifton for residential development.</td>
</tr>
<tr>
<td><strong>6. Land north of 43 Stanagate, Clifton (0.82Ha)</strong></td>
<td>A residential developer suggested two sites at Clifton for residential development.</td>
</tr>
<tr>
<td><strong>7. Land West of Cropper Road, Westby (19.15Ha)</strong></td>
<td>Cllr Ashton and residents suggested Land West of Cropper Road.</td>
</tr>
<tr>
<td><strong>8. Former Campbell Caravans, Blackpool Road, Kirkham (1.00Ha)</strong></td>
<td>Residents suggested Campbell Caravans as an alternative.</td>
</tr>
<tr>
<td><strong>9. Sunnybank Mill, Kirkham (1.08Ha)</strong></td>
<td>Residents suggested Sunnybank Mill, Kirkham as an alternative.</td>
</tr>
<tr>
<td><strong>10. Great Birchwood, Lytham Road, Warton (8.22Ha)</strong></td>
<td>A landowner suggested Great Birchwood Country Park, Warton as an alternative secondary school location on previously developed land (brownfield). The response referred to paragraph 69 of the NPPF which suggests development on previously developed land in the Green Belt can be appropriate. Some residents questioned why the Great Birchwood site keeps being rejected for housing, and that if the site is Green Belt land, whether or not the strategic sites at Warton are also Green Belt land? Two residents confirmed that the owners of the Great Birchwood site, which is brownfield land in the Green Belt, believe that this could and should be built on.</td>
</tr>
<tr>
<td><strong>11. Land North of Freckleton (29.38Ha)</strong></td>
<td>Two residents commented that it is too late to leave a review of the Green Belt until the Local Plan Part 2. They said that some Green Belt might be more appropriately classed as greenfield, allowing other opportunities for development. They added that Green Belt land north of Freckleton could be used for housing, as the land has good access to the Freckleton bypass and the future M55 Link Road (i.e. the Preston Western Distributor Road); has good bus routes; and would boost Freckleton. Some residents suggested some of the development should occur at Freckleton, some suggested the area to the north of the bypass as an alternative.</td>
</tr>
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</table>
| 12. Kirkham Grammar School Playing Fields, Blackpool Road, Kirkham (4.44Ha) | Commented that the allocation and development of their off-site playing fields for residential purposes will assist in achieving a number of aspects of the Vision, including the provision of ‘decent and affordable homes,’ 'sufficient open space and... outdoor recreational facilities' and 'new homes of an appropriate type and mix to address affordability, an ageing population and family needs will be located in suitable locations.'

The strategic objectives of the Local Plan will be met by the allocation and development of the Kirkham Grammar School playing fields site for housing. |
|---|---|
| 13. Land at Peel Road Peel, Westby (22.29Ha) | A residential developer claimed their client owns land within the Blackpool Periphery area (Land at Peel, Blackpool) and would like these sites to be included with the sites identified by policy SL2. These sites are similar and immediately adjacent to those already identified (in particular site M1) and they can make a contribution to housing and potentially employment land supply (in total the sites are approximately 20 hectares in size) alongside those already identified. The clients' sites were considered as part of the SHLAA within the settlement extension section. Their clients' sites were therefore partly considered as potentially suitable in the SHLAA but have been excluded from the emerging Allocations. Given that their clients' sites were considered as potentially suitable alongside sites that have been included under policy SL2 (in particular M1 Land East of Cropper Road), it is unclear why their clients' sites have been excluded from the allocations. It is evident that future development in this locality can further support the critical mass for services in this area including schools, shops and public transport provision that the area is currently lacking. The allocation of their clients' sites would therefore assist in making the area far more sustainable in the medium and longer term.

In the vicinity of their clients' sites there have been a number of recent planning permissions for residential / mixed use development. These permissions include on site M1 itself (12/0717), at West Field nurseries and land off St Anne's Way. In granting permission for these developments, the Council has demonstrated that these sites are considered an appropriate location for development at the present time. Therefore, their clients' sites (of which part is used as a caravan park and is therefore a brownfield site) should be considered just as favourably. It is also worthwhile to note that Paragraph 14 of the NPPF states that LPA's should positively seek opportunities to meet the development needs of their area and this is a site which can meet such development needs. Overall, the sites are partially brownfield land, have not identified constraints in their development (in terms of flooding, access, ownership and could be developed quickly) and their development |
alongside other sites will significantly assist the creation of a sustainable community. This critical mass of development provides the opportunity for new facilities for local residents including potentially a school, shops and services, employment uses and improved public transport.

14. Peel Hill Farm, Preston New Road, Westby (33.48Ha) A residential developer suggested their site (Peel Hill Farm, part of H6) has similar credentials to Whyndyke Farm and disagree with the Sustainability Appraisal site comments and Local Plans reasons for exclusion. The Fylde-Blackpool Periphery is one of the Borough's most sustainable locations and should be a principal focus of new development. Peel Hill Farm is no more detached from the existing built-up area than Whyndyke Farm, both being on the opposite side of Preston New Road. It is also suggested that Peel Hill Farm is no more visually intrusive than Whyndyke Farm, the former being bounded to the east by Carr Bridge Wood and the latter being bounded to the east by Wildings Hill Wood. Other issues raised in relation to the non-identification of Peel Hill Farm as a strategic site, such as contributions to primary education, the loss of greenfield land, archaeological significance, drainage, peat and air quality, are equally applicable to Whyndyke Farm.

15. Land East of Wesham (29.55Ha) SHLAA site WS08 is suggested by a residential developer for housing. The Councils justification for not including this site, as identified in appendix 2 were suggested as being flawed with access through site H13.

A resident suggested site H17 (Land East of Wesham) is deliverable and sustainable and the highway issues could be resolved.

16. Land adjacent Kirkham Prison, south of A583, Kirkham (38.19Ha) Some residents suggested land south of the A583 Preston – Blackpool Road as an alternative site for housing.

17. Land at Blackpool International Airport, South of Runway (25.26) (put forward by consultants on behalf of Blackpool Airport)

18. Land opposite Kirkham Trading Park, Freckleton Road, Kirkham (8.99Ha) Landowner put site forward.

Treales, Roseacre and Wharles Parish Council suggested there should be a formal presentation of the proposed option in the same way as conducted for the original 5 options offered in previous consultations.

**Windfall allowance**
The Home Builders Federation raised concern over the fact there appears to be no evidence to justify inclusion of a windfall allowance at 30 dwellings per annum. They suggested the NPPF does not specify that windfall allowances can be included beyond the first 5 years of the plan period. Refer to the Selby Core Strategy Inspector’s report and removal of windfall allowance from annual plan targets. It is important that
the delivery of windfall sites is carefully monitored, failure would require the Council to consider releasing other sites.

**Housing requirement**
A resident stated that the borough’s housing requirement should be reviewed to include the latest Office for National Statistics household projection figures and backlog not included.

**Kirkham and Wesham**
Some residents in relation to this section of the document, objected to the inclusion of land in Kirkham, and specifically referenced site H7 (Dowbridge). Issues raised included loss of best and most versatile agricultural land, flood risk, wildlife and landscape impact, historical remains, insufficient highways infrastructure and school places provision, and the oversupply of housing. Whyndyke Farm was suggested as an alternative site for the housing.

**Warton**
BAE Systems Real Estate Solutions suggested proposals for Warton to be elevated as a key service centre should be set out clearly within the main Local Plan document, particular in chapters 6, 7 and 9.

Bryning with Warton Parish Council stated that Warton does not have the local services, retail, and commercial or highways transport access to be a local service centre. Warton is not at an equivalent level to Freckleton or Kirkham for service provision. It will not be a key service centre on a par with Lytham and St Annes by 2030. A greater availability of facilities and open recreational green space should be available for the community to meet the vision for Fylde but these should be in keeping with the ‘rural’ nature of the village. Warton should not be elevated to a key service centre. Open green space along Lytham Road, west of the settlement boundary in the area designed H8, Riversleigh Farm should be identified and allocated for recreational open space in accordance with chapter 14. Financial provision should be sought via Community Infrastructure Levy as an identified need.

Cllr Brickles and a resident commented on the reference to Warton becoming a key service centre, which had been agreed at a Local Plan Steering Group meeting to be deleted and remain as a local service centre.

BAE Systems Real Estate Solutions suggested Warton Aerodrome and the Enterprise Zone should provide opportunities to build and diversify the local economy. There may be land within the aerodrome which could provide opportunities for retail and community facilities in Warton. There could be opportunities to utilise brownfield land and existing infrastructure on site as part of mixed use redevelopment.

A resident raised concerns over highways infrastructure, the proposed Preston Western Distributor Road is irrelevant, traffic impact is connected to the entrance to the employment site causing problems. An increase in resident numbers will exacerbate this and there is a potential accident risk.

In addition, the following comment was made at the full council meeting - Councillor Alan Clayton proposer; Councillor Keith Beckett seconder: add the following to the ‘Challenges’ Table on page 199 in relation to “H13 – Land north of Mowbreck Lane, Wesham (housing): “to be deferred subject to the Decision of the Secretary of State”.

**Council response**

The Council will consider additional sites put forward as it works towards the next version of the Local Plan. All sites will be included in the next SHLAA update, non-strategic sites will be considered in the Local Plan (Part 2).

Comments relating to the Housing Requirement are dealt with in chapter 6.

The Council will provide the latest position on site H13 – Land north of Mowbreck Lane, Wesham (housing) in the next version of the Local Plan (Part 1).
The comment in relation to the consultation events is addressed in the summary of consultation under the heading “consultation evaluation”.

Comments in relation to Warton becoming a key service centre over the course of the plan period are dealt with in the Vision in chapter 3.

Bryning with Warton Parish Council, Cllr Brickles and a resident’s comments on the status of Warton as a key / local service centre have been dealt with in the Vision in chapter 3.

Comments in relation to Warton, open space provision at site H8 and mixed-use redevelopment at BAE Systems, Warton are dealt with under policy SL3 in chapter 7.

A resident’s concerns over highways infrastructure and safety in the Warton Strategic Location for Development are dealt with under policy SL3 in chapter 7.

An Infrastructure Delivery Plan is being prepared alongside the Local Plan (Part 1), to assess what transport, social, green and energy infrastructure and services will be required to support the development proposed in the Plan, including details of costs, funding and delivery.

The proposal to allocate employment land at BAE Systems Warton, for mixed use is a Members Decision, which is highlighted under policy SL3 in chapter 7 and repeated below:

**Members Decision**

**Mixed use development**
Should there be a mixed use and / or employment site at Warton, with employment which compliments the Enterprise Zone?

Members agreed at the LPSG meeting on 5th June 2014 that there should be a mixed use / employment site at Warton, which compliments the Enterprise Zone. The Council will work with the Bryning with Warton Neighbourhood Plan Steering Group to identify a suitable site.

Comments in relation to the allocation of land in Kirkham and Wesham as a strategic location for development are dealt with in policy SL4 and the supporting text in chapter 7.

Comments in relation to windfall allowances and housing supply and delivery are dealt with in chapter 6 – The Spatial Development Framework.

The Council agrees to amend the table on page 205 in relation to site H13 - Land North of Mowbreck Lane, Wesham (housing), to provide the most up to date information on the site: “Residential development on part of the site has been approved on appeal.”

**Recommendations for change**

- Amend the table on page 205 of the Preferred Options in relation to site H13 - Land North of Mowbreck Lane, Wesham (housing), to read: “Residential development on part of the site has been approved on appeal.”
Appendix 3: Housing Trajectory

<table>
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<th>Representations received from:</th>
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<tbody>
<tr>
<td>Treales, Roseacre and Wharles Parish Council</td>
</tr>
<tr>
<td>Campaign to Protect Rural England (CPRE) - Fylde District</td>
</tr>
<tr>
<td>2 residents</td>
</tr>
</tbody>
</table>

What you said

Treales, Roseacre and Wharles Parish Council referred to their comments made on sites and phasing in earlier text.

Build-out rates

CPRE Fylde District commented that the build-out rates appear to be taken from the SHLAA, which was established from advice of house builders in 2009 during the market downturn. CPRE – Fylde District suggested build-out rates evidence should be provided and this should reflect anticipated market conditions over the whole Plan Period.

The inability to complete on Queensway and Whyndyke Farm by 2030 was questioned. The applicant and Inspector at appeal inquiry for Queensway placed priority on delivery. The Planning consultant for Whyndyke Farm stated 1,500 homes can be delivered by 2030. The Local Plan is potentially over estimating the number of sites needed. Where a housing scheme has been defined by a consultant or developer their own homes delivery evidence should supersede Planning Policy Team estimates.

A resident referred to errors in the trajectory. The spreadsheet clearly says H9 location twice, the latter should be site H8 which states that 220 houses will be built between 2024 and 2027. However the graph beneath the spreadsheet shows 0 houses to be built in Warton in this timeframe. Obviously these are little details but it sheds doubt on other details in the document.

A resident in relation to this section of the document, objected to the inclusion of land in Kirkham, and specifically referencing site H7 (Dowbridge). Issues raised included loss of best and most versatile agricultural land, flood risk, wildlife and landscape impact, historical remains, inadequate infrastructure and increased road traffic, loss of property values and rising insurance premiums, loss of privacy, nuisance of building works, noise and light pollution, extra refuse and risk of trespass.

Council response

Comments in relation to build-out rates are dealt with in chapter 7.

Comments in relation to Queensway and Whyndyke Farm are dealt with in chapter 7.

Comments in relation to the allocation of land in Kirkham and Wesham as a strategic location for development are dealt with under policy SL4 and the supporting text in chapter 7.

An updated housing trajectory will be produced for the next version of the Local Plan (Part 1), this will resolve the omission identified in the trajectory for site H8: Land west of Warton and site H9: Land north of Warton.
Recommendations for change

- Prepare updated housing trajectory, including rectifying identified omission(s).

Appendix 4: Parking Standards

No representations were received on appendix 4: Parking Standards.

Appendix 5: Performance Monitoring Framework

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Representations received from:

- Treales, Roseacre and Wharles Parish Council
- 1 Resident
- 1 Residential developer

What you said

Treales, Roseacre and Wharles Parish Council asked why there are no targets for Performance Monitoring Framework Indicators 6-13.

A residential developer commented that the plan provides no policy to ensure that housing requirements are consistently met throughout the plan period. They recommended that a policy to monitor the supply of housing land should be implemented to ensure a five year land supply of housing is maintained.

A resident commented on the need for monitoring:

- Measure success / failure of 'making the best use of previously developed land...to reduce the loss of greenfield land';
- Measure the objectives of 'ensuring infrastructure is available to enable new development whilst protecting and enhancing the natural and built environment';
- Measure success / failure of protecting the best and most versatile agricultural land and increasing UK food security';
- Measure 'minimise risk of flooding (tidal and fluvial -what about surface run-off) - to existing and new development and improving bathing quality';
- Why, when you set yourself the objective of 'enhancing and restoring...biodiversity' and 'expanding biodiversity resources and improving habitat connectivity' do you set yourself the much lower target of 'no net loss'
- A target to measure the health and vibrancy of the retail sector.
The resident went on to comment that there is not a logical and complete connection between Vision, Objectives, Policies and Monitoring.

**Council response**

The Council will review and update the Performance Monitoring Framework as it works towards the next version of the Local Plan (Part 1).

The Council agrees to add a reference in policy EC4 of the Preferred Options document to a 750 square metre threshold on retail floor-space and to add a new key indicator to monitor retail floor-space in Appendix 5: Performance Monitoring Framework.

The Council will improve the connection between vision, objectives, policies and monitoring in the Local Plan (Part 1).

### Recommendations for change

- Review and update the Performance Monitoring Framework.
- Add a new key indicator in Appendix 5 to monitor retail floor-space.
- Add a reference in Policy EC4 of the Preferred Options document to a 750 square metre threshold on retail floor-space.
- Improve connections between vision, objectives, policies and monitoring in the next version of the Local Plan (Part 1)
Map of Strategic Sites and sites assessed and not included

Map of Strategic Sites General Comments

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Representations received from:
- Bryning with Warton Parish Council
- Treales, Roseacre and Wharles Parish Council

What you said

Bryning with Warton Parish Council said the strategic sites map does not acknowledge the proposed Enterprise Zone as an employment site.

Treales, Roseacre and Wharles Parish Council referred to their earlier comments on the sites in the document.

Council response

The Council will identify the boundary of the Enterprise Zone at BAE Systems Warton, together with the existing employment allocations that are carried forward from the adopted Fylde Borough Local Plan and the proposed new employment allocations identified in policy EC1 of the Preferred Options document onto the Policies Map, which will be prepared to accompany the Publication version of the Local Plan. In addition to this, a new policy on the Enterprise Zone will be added to chapter 9 of the Local Plan (Part 1).

Recommendations for change

- Identify the boundary of the Lancashire Enterprise Zone at BAE Systems, Warton, on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan.

- Identify the existing employment allocations that are carried forward from the adopted Fylde Borough Local Plan and the proposed new employment allocations in policy EC1 of the Preferred Options document onto the new Policies Map, which will accompany the Publication version of the Local Plan.
Map of sites assessed and not included

### Number of representations:

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Representations received from:
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- 2 residents
- 1 residential developer

### What you said

Treales, Roseacre and Wharles Parish Council referred to their earlier comments on the sites in the document.

The Minority Group Report objected to the inclusion of “sites assessed but not included” as they give an indication that development might be acceptable in these areas. The Minority Group Report believed that brownfield or surplus employment land should be used for development, they considered there was enough of this type of land.

### Council response

The Council has to provide a clear audit trail, including the justification, to demonstrate sites which have been assessed but not included. The “sites assessed but not included” are dealt with in Appendix 2 and on the accompanying map on page 233 of the Preferred Options document.

The Council is to carry out site assessments and prepare a background paper which will comprise a portfolio of sites, identifying sites to be taken forward in the next version of the Local Plan, and those that are to be dismissed.

### Recommendations for change

- The Council is to prepare a background paper incorporating site assessments, identifying sites to be taken forward and those that are to be dismissed.
Developing Infrastructure Delivery Plan General Comments:

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Representations received from:

- BAE Systems Real Estate Solutions
- Electricity North West Ltd
- Lancashire County Council
- Kirkham Grammar School
- Residents of Mythop Road
- 1 resident

What you said

English Heritage supported the investment in parks and gardens as set out on page 54 of the Developing Infrastructure Delivery Plan for Fylde (Draft), as some of these are historic. However, they said that the contribution that the public realm makes to the historic environment should be recognised in the Infrastructure Delivery Plan. They also advised that the Council’s conservation staff should be involved throughout the preparation and implementation of the Infrastructure Delivery Plan.

Electricity North West (ENW) said, based on certain assumptions, that the electricity infrastructure in the vicinity of the proposed developments in the Preferred Options document has sufficient capacity without the need to upgrade or reinforce the local electricity network. ENW added that the electricity network will need refining, but detailed information will be required in order to determine what refinements will be required:

- Number and type / size of dwellings (large / small detached, terraced etc);
- Heating requirements of the dwellings (gas / electric / other);
- Domestic generation capability (Solar PV cells etc); and
- Employment land usage (offices, leisure, industrial / process).

Residents of Mythop Road made reference to capacity of the combined sewer system and the need to deal with surface water, as set out in the Infrastructure Delivery Plan.

The Home Builders Federation claimed that although the current version of the Infrastructure Delivery Plan identifies a wide range of infrastructure schemes, they said no funding sources are identified for much of these schemes. They added that the Council must identify the likely development costs and funding mechanisms prior to the next stage of the Plan.

The Home Builders Federation said that as it is likely that the Council will not be able to find funding for all of the listed projects, the Infrastructure Delivery Plan will need to prioritise infrastructure based upon its deliverability and ability to positively contribute towards economic growth. The Home Builders Federation added that the Council may need to reconsider its infrastructure priorities once it has undertaken the Viability Assessment of the Local Plan.

A resident claimed that barely a mention is made of shale gas exploration and extraction (i.e. ‘fracking’), and that no mention is made of the effect that it will have on Fylde’s future. The resident said that the Infrastructure Delivery Plan should include expectations for provision for increased water supply; infrastructure upgrades to accommodate the vehicles that will remove wastewater; effects on sales of...
current and future housing; and the effect on tourism and leisure. The resident stated that if proposed housing is mentioned in the Infrastructure Delivery Plan, then why isn’t shale gas exploration and extraction (‘fracking’)? It was also mentioned that the Elswick well produces methane gas, not shale gas as stated in the Infrastructure Delivery Plan.

Kirkham Grammar School made reference to paragraph 3.75, but said that the wastewater issues at the Kirkham Triangle appear to have been addressed to the satisfaction of United Utilities. They therefore claimed that it can be assumed that this issue can be addressed in the short term for this site. Kirkham Grammar School also claimed that paragraphs 6.5 and 6.6 refer to superceded yield figures for school provision, and that the updated figures should be used in the next version of the Local Plan and in the Infrastructure Delivery Plan. Lancashire County Council made reference to the latest “Planning Obligations in Lancashire” methodology, which provides the current yield and cost per school place.

BAE Systems Real Estate Solutions supported the proposed Preston Western Distributor Road and its inclusion within the Infrastructure Delivery Plan. They said that the Central Lancashire Highways and Transport Masterplan shows the indicative location of the road, and that this should therefore be shown in the Infrastructure Delivery Plan. They also claimed that it is understood that the principle justification for the road is the North West Preston Strategic Housing Area (i.e at Higher Bartle), but that the road will to some extent assist access to the Warton Enterprise Zone and Aerodrome.

BAE Systems Real Estate Solutions also supported the proposal to examine the requirement for a bypass around Warton as part of its location for strategic development. They added that alongside this appraisal should be an examination of improving links from the strategic development sites to the proposed District / Village Centre and the Enterprise Zone at Warton.

BAE Systems Real Estate Solutions also suggested that bus services from the strategic development sites to the proposed District / Village Centre and the Enterprise Zone will need to be provided to ensure accessible and sustainable communities. They also supported the statement in paragraph 2.27 in relation to the former GEC Marconi Plastics Factory site. They agree that a rail connection to Warton, within the Local Plan period, would be highly aspirational. They supported the extension of the cycle path along the A584 between Preston and Warton and were keen to work with Lancashire County Council and Fylde Council on its delivery. They also stated that they wish to work with the County Council and Fylde Council on any proposed coastal cycle route that runs adjacent to the southern part of the Aerodrome.

In relation to the former GEC Marconi Plastics Factory site, BAE Systems Real Estate Solutions suggested that wastewater and drainage was considered adequate. They also said that they would support the improvement of coastal defences. BAE Systems Real Estate Solutions also supported the provision of a secondary school within Warton. However, they claimed that it is not clear whether a primary school will be required within the settlement. They also supported the proposal for a coastal path between Starr Gate and Freckleton Marshes. BAE Systems Real Estate Solutions would wish to ensure that any proposals are aligned with the operational requirements of the Warton Aerodrome.

BAE Systems Real Estate Solutions finally suggested that it would be useful if an appendix was included that detailed the infrastructure requirements within each settlement.

The Highways Agency said they are keen to be involved in further discussions in the development of a suitable evidence base in conjunction with the Fylde Coast Highways and Transport Masterplan. They said that the ‘Blue Route’ should not be seen as a solution to congestion on the A585 as there are concerns over the viability of this route. However, they supported the M55-Heyhouses link; and the funding of the Preston Western Distributor road.

United Utilities provided an amended version of Water Supply; and Wastewater and Drainage chapters for insertion into the draft Infrastructure Delivery Plan.
Council response

The Council is liaising with a range of infrastructure and service providers to identify the infrastructure upgrades / provision that will be required over the Plan period.

The Council agrees with English Heritage to add a reference in the draft Infrastructure Delivery Plan to the public realm and the contribution it makes to the historic environment. The Council will continue to involve conservation staff in the preparation of the Infrastructure Delivery Plan, together with the Local Plan.

The Council acknowledges the comments made by Electricity North West, and will incorporate this information into the draft Infrastructure Delivery Plan.

The Council will amend the draft Infrastructure Delivery Plan, inserting the replacement text proposed by United Utilities on water supply, wastewater and drainage.

The Council is aware that there are schemes in the draft Infrastructure Delivery Plan where funding sources have not been identified. Infrastructure and service providers will continue to be engaged in the process so that such funding sources can be identified as far as possible. The Council will not presently be required to reconsider its infrastructure priorities as a result of the Viability Study, as such priorities have not yet been set. Infrastructure priorities will be identified as the draft Infrastructure Delivery Plan and Community Infrastructure Levy develop.

The NPPF requires local planning authorities to significantly boost the supply of housing.

The Council has no delegated powers to stop or regulate shale gas exploration and extraction (‘fracking’). It is the responsibility of Lancashire County Council, as the Minerals Planning Authority, to grant with conditions or to refuse planning permission for shale gas exploration and extraction. The County Council is currently preparing a supplementary planning document on shale gas exploration and extraction, which will be referred to in chapter 1 of the next version of the Local Plan (Part 1).

In accordance with comments from Kirkham Grammar School and BAE Systems Real Estate Solutions, the Council will update the draft Infrastructure Delivery Plan to take account of recent planning permissions in terms of addressing infrastructure issues. In accordance with Kirkham Grammar School and Lancashire County Council’s comments, the Council will take account of the latest “Planning Obligations in Lancashire” methodology when calculating the current yield and cost per school place.

BAE Systems Real Estate Solutions claimed that it is understood that the principal justification for the Western Preston Distributor Road is the Strategic Housing Area at Higher Bartle, but that the road will assist access to the Lancashire Enterprise Zone at BAE Systems, Warton, including the Aerodrome. However, the Council considers that the text in paragraph 2.6 should be re-ordered so that the benefits of the Preston Western Distributor Road to the Fylde Coast are mentioned, before making reference to access to the new housing that has been masterplanned in North West Preston. The County Council consulted on the preferred route of the Preston Western Distributor Road, the East-West Link Road and Cottam Link Road from 30th May to 13th July 2014.

The Council will continue to liaise with Lancashire County Council in relation to the potential development of a bypass around Warton and links towards a potential village centre at Warton and the Enterprise Zone, in addition to the upgrading of bus services.

The Council will seek to involve BAE Systems Real Estate Solutions in potential upgrades to the cycle network at Warton that would facilitate access to the Aerodrome and Enterprise Zone.

In terms of primary school places, the Council will continue to liaise with Lancashire County Council so that the anticipated number of primary school places generated by the development proposed in the Local Plan is identified, and as far as possible how such places could be delivered during the Plan period.
The Council will continue to work with the Highways Agency so that the impacts to the strategic road network are clearly understood, and major upgrades that would be required are set out in the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will also align with the schemes identified in the Fylde Coast Highways and Transport Masterplan, including the status of the “Blue Route.”

The Council considers that all of the infrastructure requirements for the Borough are set out in Appendix 2, comprising the Infrastructure Schedule and that there is no need to provide an additional appendix, detailing the infrastructure requirements for each settlement. Ongoing dialogue is taking place between the Council and staff at Lancashire County Council regarding the transport and social infrastructure requirements of settlements in Fylde, the results of which will be included in the Infrastructure Delivery Plan.

Recommendations for change

- Insert the replacement text on water supply, wastewater and drainage as recommended by United Utilities.

- Add a new paragraph 3.11A of the Preferred Options: “Electricity North West (ENW) has confirmed, based on certain assumptions, that the electricity infrastructure in the vicinity of the strategic sites in the Preferred Options has sufficient capacity without the need to upgrade or reinforce the local electricity network. The electricity network will need refining, but detailed information will be required in order to determine what refinements will be required: i.e. the number and type / size of dwellings (large / small detached, terraced etc); heating requirements of the dwellings (gas / electric / other); domestic generation capability (Solar PV cells etc); and employment land usage (offices, leisure, industrial / process)”. 

- Amend the heading before paragraph 3.72 of the Preferred Options which refers to “Blackpool Periphery Strategic Location” to read “Fylde-Blackpool Periphery Strategic Location”.

- Ensure that the Infrastructure Delivery Plan refers to all of the highway and public transport schemes and initiatives that are proposed for implementation in the Fylde Coast Highways and Transport Masterplan.

- Amend paragraph 2.6 of the Preferred Options to read: “The Preston Western Distributor Road is a proposed new road linking the M55 near Bartle with the A583 east of Clifton. The construction of the Preston Western Distributor will improve road access to the Enterprise Zone at Warton, the wider Fylde Coast, and serve new housing in north-west Preston. This will also include the delivery of a new junction (junction 2) on the M55 west of Broughton, as identified in the Central Lancashire Highways and Transport Masterplan. The developing Infrastructure Delivery Plan does not currently show a map of the route, as the route is highly indicative at present. Map 3 shows the preferred routes for the Preston Western Distributor Road, the East-West Link Road and the Cottam Link Road”

- Clarify the need for, if any and the possible location of, a new secondary school in Fylde.

- Amend the Infrastructure Delivery Plan to refer to potential upgrades to the cycle network across the Fylde and specifically at Warton that would facilitate access to the Aerodrome and Enterprise Zone.
• Update the Infrastructure Delivery Plan, incorporating a list of infrastructure requirements for each of the strategic locations for development, and issue it for consultation alongside the Local Plan.

• Add the following reference to the public realm in the Infrastructure Delivery Plan: “The public realm generally includes the spaces and the buildings surrounding them but in this context, is generally taken to be the publicly accessible parts of the environment, physically and/or visually. In the case of conservation areas, the design, management and maintenance of the public realm is an important element of its character and a particularly important indicator of the quality of place. In designing the public realm, the most appropriate materials and street furniture will be used consistent with available resources. It will then be appropriate to put in place a ‘public realm code’. Essentially, this will provide a manual that will identify a specification for the various elements of the public realm including street furniture, landscaping, and materials and an inventory with agreed maintenance schedules put in place. This practice would represent a good means of auditing the quality of the public realm and agreed actions from the various partners involved would highlight what is required to maintain it to an appropriate standard. This initiative will involve working alongside the highway authority, Lancashire County Council”.

• Add a new paragraph after 10.11 of the Preferred Options saying: “Joint working has already started on the planning, delivery and maintenance of a coastal path between Starr Gate and Freckleton Marshes, between Fylde Council and Lancashire County Council”.
Sustainability Appraisal

Sustainability Appraisal General Comments:

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Representations received from:

- English Heritage
- Natural England
- 1 Resident
- 1 Action group

What you said

**Heritage**

English Heritage commented that the Local Plan lacks any proper description or assessment of the historic environment, lacks a robust policy for the management of the historic environment and the supporting evidence base is deficient in relation to heritage information. Therefore, English Heritage considered that the effects on the historic environment is uncertain as it is not possible to determine the Plan’s impact on the Borough’s historic environment. English Heritage advised that the Council’s conservation staff should work closely on the preparation of the Sustainability Appraisal of the plan.

**Baseline Indicators**

Overall, Natural England supported the baseline natural environment indicators and welcomed the matrix of compatibility of the Sustainability Objectives.

Natural England suggested further work is required on the strategic sites put forward as the Sustainability Appraisal shows negative impacts in terms of biodiversity and geodiversity.

Natural England welcomed objective 10 but suggested there should be mention of soils. They recommended the inclusion of a specific objective for soils within the environmental sustainability objectives.

Natural England suggested that some of the social and economic objectives could be improved by further emphasising the importance of Green Infrastructure and its multifunctional benefits, which would assist in the delivery of a range of Sustainability Appraisal topic areas. This would assist in ensuring that Green Infrastructure is an integral, cross-cutting theme.

Natural England welcomed recognition of the requirements of the NPPF, including the need to protect and enhance biodiversity, including designated sites, landscape and open space, water quality, air quality and to address climate change. The NPPF also includes requirements to protect and enhance public access and best and most versatile soils.

[^31]: Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.
Natural England suggested the scope of the Sustainability Appraisal should be relevant to the issues addressed in the Local Plan which itself should reflect the requirements of the NPPF.

Natural England suggested protected species could specifically be included in the Sustainability Appraisal and Natural England has produced standing advice. The standing advice also sets out when, following receipt of survey information, the local planning authority may need to undertake further consultation with Natural England.

**Monitoring framework**

Natural England suggested the monitoring framework includes some helpful indicators which are welcomed. They suggested further monitoring indicators in relation to:

- Biodiversity / geodiversity / landscape.
- Green infrastructure / recreation / access
- Landscape character and quality

Natural England welcomed the inclusion of access standards and suggested the use of ANGST benchmarks and other national standards such as Green Flag and County Park accreditation schemes. They welcomed reference to landscape character and suggested the use of National Character Areas.

**Plans, Programmes and Environmental Protection Objectives**

Natural England welcomed the list of policies, plans and programmes and suggested it appears to cover all relevant documents. They suggested the list should be updated during the next stage of the Sustainability Appraisal process to ensure emerging policies, plans and programmes are added to the baseline.

**Fylde-Blackpool Periphery**

In relation to Whyndyke Farm, an action group commented that they disagree with the comments describing the landscape as poor quality. The loss of this land to mixed use development would be visually over-bearing and could encourage creeping development.

**Warton**

A resident commented on the findings of the Sustainability Appraisal / Strategic Environmental Assessment in relation to Warton:

- “Congestion in the area will not improve” — they suggested the Local Plan should commit to road improvements, including a bypass. Further housing will increase highways congestion.
- “Warton also benefits from a range of employment opportunities” — Warton only has two main employers and BAE Systems are in decline. The resident also suggested the Sustainability Appraisal quote contradicts reference in the Sustainability Appraisal that development will not promote economic inclusion, opportunities or business development.
- “There is a lack of community facilities in Warton” — Development would create further pressure on Warton’s limited facilities and the Local Plan does not guarantee the provision of further facilities.

**Council response**

**Heritage**

Comments in relation to heritage are dealt with in chapter 14 of the Local Plan (Part 1).

**Baseline Indicators**

The comments of Natural England are noted.

The Council will undertake further work on the strategic sites as it produces the next version of the Local Plan, this will take on board the findings of the Sustainability Appraisal and address any potential negative impacts.
The Sustainability Appraisal objectives were rationalised following the previous sustainability appraisal scoping consultation. Soil is currently included within objective 16 “Ensuring the sustainable use of natural resources”. The Council will liaise with the consultants who undertake the Sustainability Appraisal to consider whether objective 10 should also refer to soils.

Further cross cutting references to Green Infrastructure within the social and economic objectives and inclusion of protected species in the Sustainability Appraisal will be considered.

**Monitoring Framework**
The Council will liaise with the Sustainability Appraisal Consultants to consider the further monitoring indicators suggested by Natural England.

**Plans, Programmes and Environmental Protection Objectives**
The Plans, Programmes and Environmental Protection Objectives will be reviewed and updated as part of a future stage in the Sustainability Appraisal process, this will include adding relevant information to the baseline.

**Fylde-Blackpool Periphery**
The Council are proposing to undertake landscape assessment work at the Strategic Locations for Development. This work will feed into the future Sustainability Appraisal process. The reference to visually poor quality uses on land at the edge of Blackpool refers to the previously developed land for a range of visually poor quality uses, including horticulture, caravan storage, scrap yards, kennels and the former Pontins Holiday Camp amongst others. Redevelopment following strict design guidelines could benefit the character of the area.

**Warton**
Comments in relation to highways infrastructure, employment opportunities and community facilities in Warton are dealt with under policy SL3 in chapter 7.

**Recommendations for change**
- Update Plans, Programmes and Environmental Protection Objectives and add relevant information to the baseline.
Habitats Regulations Assessment – Screening Report

Habitats Regulations Assessment General Comments

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Representations received from:

- Natural England
- Lancashire Wildlife Trust
- 1 Action Group

What you said

**Natural England**
Overall, Natural England were satisfied with the approach taken in relation to the Habitats Regulations Assessment. They suggested there are some outstanding concerns within the Habitats Regulations Assessment conclusions which must be resolved before the Plan progresses to ensure no uncertainty remains at the submission stage.

Natural England sought further detail on the measures that will be taken to avoid potential impacts as result of the Strategic Locations for Development. They suggested that more evidence and explanation to support the view that the additional policy wording / strengthening outlined are robust enough to ensure that the preferred options are 'unlikely to have any significant effects on the European Sites identified, either alone or in combination with any other plans and projects'.

Natural England suggested that this information is provided and once more detail is known, it is likely that changes will occur between the current draft (Preferred Option) and the next stage, therefore the plan should be rescreened with respect to The Conservation of Habitats and Species Regulations 2010. Natural England should be consulted on any amendments that may lead to a likely significant effect(s) on any European Site.

**Lancashire Wildlife Trust**
Lancashire Wildlife Trust commented in relation to the Habitats Regulations Assessment conclusion and said it was unclear whether the Assessment's recommendation to re-word the policy had already been factored into the Local Plan to address concerns of the strategic sites and specifically H5.

**In-combination effects**
An action group objected to the failure of the Habitats Regulations Assessment screening report to identify Lytham Moss as functionally linked to Ribble and Alt Estuary. The action group suggested the 'in-combination effects' of the Local Plan, shale gas exploration on the Moss, drainage issues and the current Queensway scheme should be considered.

Council response

**Natural England**
The comments of Natural England are noted.

The Preferred Options Habitats Regulations Assessment screening and Natural England’s comments will assist the Council in producing the next version of the Local Plan, which will then be rescreened with...
respect to The Conservation of Habitats and Species Regulations 2010. The Council will consult Natural England on any revised Habitats Regulations Assessment Screening.  

Lancashire Wildlife Trust
The Habitats Regulations Assessment screening was undertaken on the Local Plan Preferred Options document. The Preferred Options document published for consultation does not factor in the findings of the independent Habitats Regulations Assessment Screening. The Habitats Regulations Assessment Screening will be factored into the next version of the Local Plan.

The planning status of the proposed strategic sites in the Preferred Options document was taken at a base date of November 2012 with the Preferred Option document published for consultation in June 2013. At the November 2012 base date, a planning application had been submitted for site H5. In May 2013 site H5 received outline planning permission. As part of this process, Natural England were consulted and did not raise any objections to the scheme. It was unfortunate that this update in planning status of site H5 could not be reflected in the Preferred Options document and thus reflected in the Habitats Regulations Assessment Screening. This information will be reflected in the next version of the Local Plan, which will then be subject to Habitats Regulations Assessment screening, following which Natural England will be consulted on the site.

In-combination effects
Table 5-2 of the Habitats Regulations Assessment screening report provides a detailed assessment of the Strategic Sites in relation to European sites within and outside of Fylde. In regards to the Strategic sites, the Habitats Regulations Assessment screening report suggests “……. The significance of impacts of development at these strategic locations is likely to be greater the closer the proposed development is to the European Site……. development in these strategic locations (in particular, policy SL2, which includes an allocation of 20ha for mixed use development at Whyndyke Farm) does have the potential to adversely affect land which may be functionally linked to European Sites (e.g. agricultural land used by foraging pink-footed geese, a feature of Morecambe Bay Special Protection Area, Ribble and Alt Estuaries Special Protection Area and Martin Mere Special Protection Area).”

The comments in relation to the ‘in-combination effects’ of shale gas exploration and extraction in relation to the Local Plan, drainage and Queensway will be considered for inclusion as part of the Habitats Regulations Assessment re-screening process.

Recommendations for change

- Re-screen the Local Plan (Part 1) at the next stage.
Rural Proofing Assessment

Rural Proofing Assessment General Comments

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Representations received from:
- English Heritage

What you said
English Heritage stated that they have no comments to make on the Rural Proofing Assessment.

Council response
The Council acknowledges that English Heritage have no comments to make on the Assessment.

Recommendations for change
- None
Rapid Health Impact Assessment

Rapid Health Impact Assessment General Comments:

Comments on the Rapid Health Impact Assessment are included in chapter 11.
Local Plan and Community Infrastructure Levy - Viability Study

In preparing this evidence document the Council has sought to engage with practitioners involved in the development industry. This report was prepared following a consultation process with landowners, agents and developers. Two events have been held and input into modelling provided by stakeholders.

20th June 2013:

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Attendees included:
- Environment Agency
- Blackpool Council
- Wyre Council
- Lancashire County Council
- 10 residential developers
- 4 Landowners

Presentation and discussion with promoters of the key development sites within the District and the representatives of the main developers, development site landowners and housing providers. The meeting was used to introduce the development industry to the NPPF and the Community Infrastructure Levy, to set out the methodology, test the assumptions used in the report and to put the report in context. The event was divided into three parts:

i. An introduction to viability testing in the context of the Community Infrastructure Levy regulation 14 and paragraph 173 of the NPPF.
ii. Viability Assumptions. The methodology and main assumptions for the viability assessments were set out including development values, development costs, land prices, developers and landowners returns.
iii. Discussion. A wide ranging and informative discussion took place. There was not agreement on all points although there was a broad consensus on most matters. The feedback was carefully recorded.

Following the consultation event on the 20th June, the main assumptions were circulated to the consultees and written representations invited in the context of the Harman Guidance. Where specific representations were made the consultants have re-considered the assumptions made.

1st August 2013:

Pro formas setting out the main development assumptions were sent to landowners, developers, agents and promoters of strategic sites. Their comments were received to ensure that the modelling was as representative as possible.

9th September 2013:

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<th>Number of Attendees:</th>
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Attendees included:
- Environment Agency
A second meeting including a presentation and discussion was held with promoters of the key development sites within the Borough and the representatives of the main developers, development site landowners and housing providers. The meeting was used to set out the changes that had been made to the assumptions in light of the comments received at and following the first meeting. The main points made were as follows:

- Two separate comments about the need to provide incentives to house purchasers in order to realise sales and that these costs required inclusion in the development cost / values.
- Developer’s profit to reflect competitive return adopted profit margin should be 20% of Gross Development Value on all sites.
- Density – reference was made to the emerging large scale proposal on greenfield land at North West Preston. Volume house builders promoting development here are commenting that they are currently building at 25/ha in other greenfield locations in Central Lancashire. It was noted that this would vary considerably depending on the amount of open space provided.
- The average unit is too small for some of the modelled sites e.g. 70 sq m which was not reflective of market demand.
- Request made to include a larger site within the modelled sites to provide greater balance.
- Should include comparables for Taylor Wimpey’s Meadow View scheme in Warton (60 units for family housing) – these details were requested (but not subsequently provided)
- Comment was made as to the alternative value for sites being promoted for residential development (£300,000 was considered too low) and the level of uplift to incentivise land release

Consultee comments made after the event are recorded below and are summarised in order to retain anonymity:

- That a nil Community Infrastructure Levy rate be set for employment development in the Enterprise Zone at BAE Systems, Warton – although no viability evidence was provided to support such a charging zone.
- The appraisals adopt densities which have a higher proportion of 2 and 3 bed units. Given the strategic objective to deliver lower density housing, we would suggest that the mix of types should, instead, be weighted more towards larger 4 and 5 bedroom properties.
- As a standard rule of thumb, every net developable acre should be able to deliver in the region of 12,000 - 15,000 square feet or 3,000 - 3,400 square metres per hectare.
- Market housing prices in the consultation document are based on overly “optimistic” asking prices from developers who are heavily discounting and incentivising in the background and in some cases are seeing stagnant sales rates. No alternative prices were provided or put forward by the industry or consultees.
- It was suggested that sales values inducements of up to 10% of gross asking prices need to be reflected in the residential values.
- It was suggested that an overly simplistic approach has been taken in respect of values for affordable housing – although no alternative was suggested.
- Residential value of £1,000,000/ha was considered too low although no alternative evidence was provided, in spite have having been requested.
- Infrastructure costs should be at least 15% and up to 20% of base construction costs.
- Evidence of actual residential land values should be used to inform alternative use values and % uplift.
- Interest charges should also include arrangement (1% of loan value), management (at £1,000 per month) and exit fees (1% of loan value).
- Disposal cost of 3% is too low. A minimum of 4% should be used to reflect marketing and legal fees.
Council response

Based on the good turnout and level of engagement, the Council are confident that the consultation process captured the views of the key stakeholders operating in the area. The comments of the consultees are reflected throughout the report and the assumptions have been adjusted where appropriate. Where there was disagreement, the consultants have made a judgement and set out why the consultants have made the assumptions used. In this report the consultants have not attributed these comments to the consultees as they undertook to present all representations on an anonymous basis, with a view to a more open and frank engagement and to protect commercially sensitive matters. The Council will consider the findings of the two consultation events with landowners, agents and developers into the Community Infrastructure Levy Viability Study.
## Appendix A - List of Consultees Who Made Representations on the FYLDE Local Plan Preferred Options – Part 1

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**Infrastructure Providers – 3**

<table>
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<th>Code</th>
<th>Name</th>
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<tr>
<td>OC/ISP/11/01347</td>
<td>Essar Oil (UK)</td>
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<tr>
<td>OC/ISP/08/00694</td>
<td>Health &amp; Safety Executive</td>
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<td>OC/ISP/10/01013</td>
<td>Health and Safety Executive Nuclear</td>
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**Land Owners – 7**

<table>
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<tr>
<th>Code</th>
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<tbody>
<tr>
<td>OC/LO/13/01647</td>
<td>Blackpool Business Park 2 Limited</td>
</tr>
<tr>
<td>OC/LO/13/01768</td>
<td>Co-operative Estates</td>
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<tr>
<td>OC/LO/13/01644</td>
<td>Great Birchwood Country Park Ltd</td>
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<tr>
<td>OC/LO/13/01645</td>
<td>Hollins Strategic Land LLP</td>
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<tr>
<td>OC/LO/12/00968</td>
<td>Mactaggart and Mickel</td>
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<tr>
<td>OC/LO/12/00948</td>
<td>Metacre Ltd</td>
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<tr>
<td>OC/LO/13/01642</td>
<td>Telereal Trillium</td>
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**Local Property Developers – 7**

<table>
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<tr>
<td>OC/LPD/12/00928</td>
<td>Bloor Homes</td>
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<td>OC/LPD/13/01646</td>
<td>Gladman Developments</td>
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<tr>
<td>OC/LPD/08/00747</td>
<td>Kensington Developments Ltd</td>
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<tr>
<td>Registration Number</td>
<td>Company Name</td>
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<tr>
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<tr>
<td>OC/LPD/13/01767</td>
<td>McCarthy and Stone Retirement Lifestyles Ltd</td>
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<tr>
<td>OC/LPD/08/00722</td>
<td>Morris Homes (North) Ltd</td>
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<td>OC/LPD/13/01540</td>
<td>Redrow Homes Lancashire</td>
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<td>OC/LPD/08/00725</td>
<td>Windmill Group of Companies</td>
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**Nature Conservation/Countryside – 1**

<table>
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<tr>
<th>Registration Number</th>
<th>Company Name</th>
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<tr>
<td>OC/NCC/08/00771</td>
<td>National Farmers Union</td>
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**Recreational Bodies – 1**

<table>
<thead>
<tr>
<th>Registration Number</th>
<th>Company Name</th>
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<tbody>
<tr>
<td>OC/RB/13/01541</td>
<td>The Boys' Brigade</td>
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**Sports Clubs/Bodies – 3**

<table>
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<th>Registration Number</th>
<th>Company Name</th>
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<tbody>
<tr>
<td>OC/SC/B/13/01371</td>
<td>Lytham St Annes Cycle Group</td>
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<tr>
<td>OC/SC/B/13/01495</td>
<td>Pendle Production Ltd</td>
</tr>
<tr>
<td>OC/SC/B/13/01548</td>
<td>Warton Typhoons FC</td>
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**Schools – 4**

<table>
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<tr>
<th>Registration Number</th>
<th>School Name</th>
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<tbody>
<tr>
<td>OC/SCH/08/00868</td>
<td>Carr Hill High School</td>
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<tr>
<td>OC/SCH/08/00874</td>
<td>Holy Family Catholic Primary School</td>
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<tr>
<td>OC/SCH/12/00997</td>
<td>Kirkham Grammar School</td>
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<tr>
<td>OC/SCH/13/01720</td>
<td>National Union of Teachers Fylde Association</td>
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**Transport Bodies – 2**

<table>
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<tr>
<th>Registration Number</th>
<th>Company Name</th>
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<tbody>
<tr>
<td>OC/TB/13/01649</td>
<td>Blackpool International Airport Ltd C/O Nathaniel Lichfield and Partners</td>
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<tr>
<td>OC/TB/13/01734</td>
<td>Centrica Plc - Heliport Terminal C/O BNP Paribas Real Estate</td>
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**Local Authorities – 5**

<table>
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<tr>
<th>Registration Number</th>
<th>Local Authority</th>
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<tbody>
<tr>
<td>SCB/LA/08/00388</td>
<td>Blackpool Council, Head of Planning</td>
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<tr>
<td>SCB/LA/08/00396</td>
<td>Lancashire County Council, Property Group</td>
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<tr>
<td>SCB/LA/10/01110</td>
<td>Lancashire County Council, Richard Camp</td>
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<tr>
<td>SCB/LA/08/00390</td>
<td>South Ribble Borough Council</td>
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<tr>
<td>SCB/LA/08/00391</td>
<td>Wyre Borough Council</td>
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**Parish Councils – 10**

<table>
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<tbody>
<tr>
<td>SCB/PC/08/00416</td>
<td>Bryning with Warton Parish Council</td>
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<td>SCB/PC/08/00408</td>
<td>Elswick Parish Council</td>
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<td>SCB/PC/08/00409</td>
<td>Greenhalgh with Thistleton Parish Council</td>
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<td>SCB/PC/08/00405</td>
<td>Kirkham Town Council</td>
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<td>SCB/PC/08/00403</td>
<td>Medlar with Wesham Town Council</td>
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<td>SCB/PC/08/00406</td>
<td>Newton with Clifton Parish Council</td>
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<td>SCB/PC/08/00414</td>
<td>Ribby with Wrea Green Parish</td>
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<td>SCB/PC/08/00411</td>
<td>Singleton Parish Council</td>
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<td>SCB/PC/08/00412</td>
<td>Treales, Roseacre and Wharles Parish Council</td>
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<td>SCB/PC/08/00410</td>
<td>Westby with Plumtons Parish Council</td>
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**Specific Consultation Bodies – 12**

<table>
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<tbody>
<tr>
<td>SCB/SCB/08/00363</td>
<td>CPRE - Fylde District</td>
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<td>SCB/SCB/13/01388</td>
<td>Electricity North West Ltd</td>
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<td>SCB/SCB/08/00350</td>
<td>English Heritage</td>
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<td>SCB/SCB/08/00351</td>
<td>Environment Agency</td>
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<td>SCB/SCB/08/00347</td>
<td>Highways Agency</td>
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<td>SCB/SCB/13/01517</td>
<td>Lancashire Enterprise Partnership</td>
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<td>SCB/SCB/08/00697</td>
<td>Mobile Operators Association</td>
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<td>SCB/SCB/08/00343</td>
<td>Natural England Government Team South</td>
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<td>Organisation</td>
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<td>SCB/SCB/08/00354</td>
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<td>SCB/SCB/08/00355</td>
<td>United Utilities North West</td>
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<td>Sport England</td>
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<tr>
<td>SCB/SCB/14/02042</td>
<td>Lancashire Sport Partnership Ltd</td>
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