

Regulation 18 Consultation,
Planning Policy Team,
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SENT BY EMAIL

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30/10/2025

Dear Planning Policy Team,

OPTIONS, ISSUES, VISION AND SCOPE FOR THE NEW FYLDE LOCAL PLAN TO 2042

1. Thank you for consulting with the Home Builders Federation (HBF) on the Options, Issues, Vision and Scope (Regulation 18) draft of the new Fylde Local Plan to 2042.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF would like to submit the following comments upon selected questions posed by the Council within the Regulation 18 consultation document, plus additional comments to pick up on other key themes. These responses are provided to assist the Council in the preparation of the emerging Local Plan. The HBF is keen to ensure that Fylde produces a sound local plan which provides appropriate policies for the area.

The Development of a New Local Plan

Q1. Do you agree that the Council should produce a new/amended Local Plan?

Q2. Do you think that the Council should produce: A reviewed Local Plan with additional allocations to extend to 2042? A completely new Local Plan with entirely new policies decided from scratch? Or Other (please state)?

4. Given the changes to national planning policy through the latest National Planning Policy Framework (NPPF, 2024), the HBF considers that the Council may benefit from producing a new Local Plan rather than amending the existing Local Plan. Irrespective of this, the most important matter is that any new/reviewed Local Plan should pass the tests of soundness contained in paragraph

35 of the NPPF. In particular, that the plan seeks (as a minimum) to meet the area's housing needs over the plan period.

5. In addition to this, the Council will be aware that the NPPF is clear that Local Plans should have strategic policies which look ahead over a minimum 15 year period from adoption and where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) (paragraph 22).
6. The plan period is envisaged to run from 2024 – 2042 and the current Local Development Scheme (LDS), which was adopted in January 2025, envisages the adoption of the Local Plan by October 2027. This means that if the current timetable is adhered to, then the Council may only just be able to demonstrate a 15 year plan period from adoption. However, any slippage in timescales will mean this will not be able to be demonstrated, which will create a fundamental soundness issue with the plan.
7. Given that there is already some slippage in the timetable outlined in the LDS, the HBF recommends that the plan period is lengthened so that there is a sufficient buffer so that the 15 year minimum plan period from adoption can be achieved, even taking into account any possible delays.

Spatial Portrait of Fylde, Key Issues and Vision

Spatial Portrait of Fylde in 2025

Q5. Are there other important issues that have not been identified? Please provide details.

8. The Spatial Portrait correctly identifies a key demographic pressure for Fylde which is an aging population. Whilst the implications of this identified by the Council include important factors such as housing affordability, an ageing population is also an indication of a shrinking working age population. Maintaining a working age population for the Borough is vital if settlements are to remain viable and sustainable in the future. Therefore, alongside looking to boost housing for older people, the Borough should also be taking active steps to boost the supply of homes more generally, to ensure housing needs for the entire borough are met and that the demographic issue of an aging population can be tackled.

Producing a new Vision for Fylde to 2042

Q6. Do you support the Fylde in 2042 Vision as set out above?

9. The HBF supports that the Vision specifically spells out that new homes will be developed to meet housing needs. This is important so as to ensure development is undertaken in a sustainable way.

Q7. What changes do you think should be made to the Fylde in 2042 Vision if any?

10. Whilst the reference to meeting housing needs is important, the Vision would benefit from saying that this will be achieved through the development of a variety of sites, in a variety of sizes and in a variety of sustainable locations.
11. It is also important that housing needs is aligned to the area's economic development ambitions so there is an appropriate balance between new homes and jobs. If this means seeking a figure that goes beyond the Local Housing Need (LHN) calculated through the Standard Method, then this should be done.
12. Similarly, if it is the case that cooperation in meeting housing needs is undertaken with neighbouring Boroughs, then this should be referred to in the Vision.

Development Strategy Options

13. The consultation draft of the plan puts forward three options for a Development Strategy for the Borough. These are.
 - Option 1 - Retaining the Existing Development Strategy with Updates (based on the four strategic locations in the existing Local Plan).
 - Option 2 – Variant on the Existing Development Strategy.
 - Option 3 – Entirely New Development Strategy.
14. Whilst it is noted that Questions 8 – 16 asks for specific views on each option, the HBF considers that it is important that the Development Strategy allows for the delivery of sufficient homes to meet the local housing needs, across a range of housing types and in a variety of locations. This should include land for larger strategic allocations as well as smaller land parcels for small and medium sized house builders.
15. Within the consultation document, the Council refers to the Green Belt as a constraint which may affect the Development Strategy for the area. The HBF would remind the Council that the NPPF states that Green Belt boundaries can only be altered in exceptional circumstances, but crucially that exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes (paragraphs 145 and 146).
16. Therefore, if local housing needs in specific locations in the Borough can only be met by Green Belt release, then the Council should consider this as an exceptional circumstance.
17. The HBF also notes that there are a number of allocations in the existing plan which have not yet been developed. The HBF considers that if these are to be 'rolled forward' to the new Local Plan, the Council will need to understand why these sites have not yet come forward and ensure that any issues identified can then be addressed in the new Local Plan so that these sites can be delivered.

18. The Development Strategy also appears in places to discount settlements for future growth on the basis that strategic allocations have already been built out (eg. paragraph 3.10). The HBF wishes to highlight that this plan will be covering a new plan period and the Development Strategy will need to be informed by housing needs over that new plan period, rather than being informed by what has taken place over a previous plan period.

Policy Issues: Housing

Overall Housing Needs

Q17. Should the Local Plan provide for: a) 410 homes per year? b) 410 homes per year plus a number agreed through the Fylde Coast Duty to Co-operate process if unmet need arises, consistent with sustainable development? c) A lower figure? (please specify) d) A higher figure? (please specify)

19. The NPPF outlines in paragraph 62 that to determine the minimum number of homes needed, strategic policies should be informed by a Local Housing Need (LHN) assessment, conducted using the Standard Method. In addition to the LHN, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

20. The Planning Practice Guidance (PPG) then outlines how to use the Standard Method to calculate the LHN (Reference ID: 2a-004-20241212).

21. Using the most recent affordability data (from March 2025) and the most up to date housing stock information (from May 2025), the HBF calculates the LHN figure for Fylde is 419 dwellings per annum (rather than the 410 dwellings per annum stated in the consultation document). This means over the stated plan period, the new Local Plan should plan for 7,542 dwellings.

22. It should be noted that this is a minimum figure and that the Council may conclude that from its evidence base that a figure which is higher than this is appropriate. The PPG outlines instances where this may be appropriate including where the Council may seek to reflect economic growth aspirations (Reference ID: 2a-040-20241212), where an uplift in the overall housing requirement would assist in the delivery of affordable homes (Reference ID: 2a-024-20190220), or to address a specific demographic issue.

Housing Mix

23. The HBF notes there is not a specific question in relation to this. The consultation document mentions the 2022 Fylde Housing Needs Survey (HNS). This document will need to be updated in line with the latest data and Government policy to help inform the new Local Plan.

24. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is,

however, important that any policy that does emerge is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements. This flexibility needs to also take into account the location and character of specific sites, as well as commercial, market and viability considerations.

25. The updated evidence base should also examine affordable housing need to inform a future Local Plan policy and should include the impact of such policies on the viability of development. As outlined above, it should be noted that the PPG states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes (Reference ID: 2a-024-20190220).

Policy Issues: Protected Environments and Assets

Green Belt

Q41. Do you support the Council's proposal that the Green Belt should not be reviewed? Please provide any necessary explanation.

26. The HBF considers that there is merit in undertaking a review of the Green Belt. Whilst it is noted that the consultation document states in paragraph 6.30 that in Fylde, the areas covered by Green Belt represent only a small minority of the overall area of undeveloped land, those areas covered by Green Belt do surround some of the Borough's larger settlements (Lytham St Annes, Walton/Freckleton, Kirkham/Wesham). There is also Green Belt which forms the urban edge of neighbouring Blackpool.

27. It is therefore likely that any future spatial strategy for the Borough is going to include growth in these areas (given their likely places in a future settlement hierarchy) and therefore to meet the needs in these settlements, a review of the Green Belt should be undertaken.

Areas of Separation

Q43. Is there a need to review the boundaries of the Areas of Separation?

28. The HBF would recommend that the Areas of Separation are reviewed. The housing growth that the Borough will need to accommodate over the plan period will clearly present a challenge. To identify sustainable locations to meet this need, there will be a need to review designations such as Areas of Separation and seek to balance this against the updated housing requirement.

The Countryside

Q46. Please give any further comments on how the Local Plan policies should operate outside settlement boundaries

29. The HBF considers that it is important that the new Local Plan can be as flexible as possible in accommodating future housing needs and this includes how it addresses land outside of the built-up area.
30. To support the Council in meeting its housing need, the HBF would discourage the use of arbitrary settlement boundaries and instead include positive planning policies which permit sustainable sites to come forward which are well-related to the built-up area. This will ensure the potential for meaningful windfall development is maximised, which in turn can add further flexibility to the Council's housing supply

Policy Issues: Infrastructure

Q48. Do you support the Council's general approach to the requirement for infrastructure?

31. In progressing its new Local Plan, the Council will need to produce its own Infrastructure Delivery Plan (IDP) which can establish the infrastructure which is needed to deliver the allocations in the plan and provide a cost for these. The HBF considers that this is important in ensuring transparency in showing how housing growth can support infrastructure provision. To provide as much clarity as possible, the IDP should be produced early on and then updated throughout the plan-making process.
32. The HBF also believes that the IDP should form a key part of the whole-plan viability assessment to demonstrate that the provision of such infrastructure does not threaten the deliverability of the proposed allocations in the Local Plan
33. It is noted by the HBF that paragraph 7.4 of the consultation document states:
- "The existing Local Plan contains policies to require provision of infrastructure to the site, or where infrastructure will be provided off-site, to require developer contributions to ensure its provision. The Council considers such policies will be needed going forward. Infrastructure or developer contributions can only be required where directly related to the development."*
34. As outlined above, such developer contributions should be included in the whole-plan viability assessment. Whilst it is noted that the Council has stated that it will only require developer contributions where directly related to the development, this needs to go further and reference the statutory tests found in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and replicated in paragraph 58 of the NPPF, in that all developer contributions should be:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.

Design and Amenity

Q54. What further comments do you have on how the new Local Plan should address the issue of design?

35. Within Section 12, the NPPF is clear about the importance of design in creating successful and sustainable places and the HBF recognises this as an important component of plan-making.
36. In producing policies to cover this area in the new Local Plan, the Council should seek to balance the need for clarity about design expectations without policies or design codes becoming too rigid and overly prescriptive, as this can stifle innovation in design. It is also not the place of the Council to seek to impose its own style on developments as this will also need to be informed by an understanding of an individual site's opportunities and constraints.
37. Any specific requirements that are included in future policies should be based on robust evidence and tested in terms of their impact on viability.

Climate Change, Renewable Energy and Flood Risk

Flood Risk

Q55. Would you support an absolute requirement that all development sites result in no greater surface water runoff after development than when they were in their greenfield state?

38. In formulating policies for managing drainage and flood risk, the Council should ensure that these are based on robust evidence and are in line with the latest updates made to the PPG on 17 September 2025 and the latest guidance on Sustainable Drainage Systems (SuDS) (July 2025).

Building Efficiency

Q60. Do you support a whole-life-carbon approach to the assessment of building efficiency?

39. The HBF considers that if the Council is to introduce a policy in relation to whole life carbon (WLC) it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how the policy will interact with other policies, for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development.
40. Aecom on behalf of MHCLG have undertaken a research report on the practical, technical and economic impacts of measuring and reducing embodied carbon in new buildings (see

<https://www.gov.uk/government/publications/consideration-of-embodied-carbon-in-new-buildings>).

41. Aecom highlights issues with the lack of consistency in reporting on carbon assessment outputs, the quality of carbon assessments, large gaps in the availability of both product specific and generic data, the variation in product carbon results for similar building products and lack of consistency across carbon tools. They also highlight issues with the uptake of lower embodied carbon materials and products due to the costs, risks and insurance, the need to upskill the industry and access to carbon tools.
42. Whilst this report makes recommendations as to how all of the challenges they identify can be addressed, they have not been addressed yet, and are not likely to be addressed in the short term. The HBF is concerned that as such, there are significant challenges with introducing a policy in relation to WLC, for many of the reasons identified in this research and without a clear and fully evidenced policy, such a WLC policy cannot be supported.

Other Matters

Q61. Is there anything else that the new Local Plan should contain that has not been mentioned? Please explain as fully as possible.

43. The new Local Plan will need to contain policies which address biodiversity net gain (BNG). Whilst the PPG is clear that there is no requirement to include policies which duplicate the detailed provisions of the national statutory framework, plan-makers are able to complement the statutory framework for BNG by including policies which support appropriate local offsite biodiversity sites. This includes whether specific allocated sites for development should include biodiversity enhancements to support other developments and meet their net gain objectives in line with Local Nature Recovery Strategies (Reference ID: 74-006-20240214).
44. The HBF would recommend having this local aspect of BNG covered within the new Local Plan to assist our members in bringing forward their sites for new homes.
45. Throughout these representations, the HBF has placed great importance on ensuring the policies and requirements of the new Local Plan are robustly tested in terms of viability and this should be a core element of the plan making process which runs through all aspects of the new Local Plan.
46. Finally, it will be important that any new Local Plan contains an implementation and monitoring section which explicitly outlines the precise measures that will be taken if policies within the new Local Plan do not deliver as expected (eg. in the event that the Council can no longer demonstrate a five year supply of deliverable housing land).

Future Engagement

47. The HBF trusts that the Council will find these comments useful as it continues to progress its Local Plan. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
48. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

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