



Regulation 19 Consultation,
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Date: 17 March 2025

Dear Sir/Madam

Central Lancashire Local Plan 2023-2041: Regulation 19 Consultation

Thank you for inviting Fylde Council to comment on the Regulation 19 consultation on the Central Lancashire Local Plan (CLLP). Fylde Council has, in accordance with the Duty to Co-operate, participated in meetings and consultations and is committed to continuing to work together in support of the development of the plan.

National Policy

Fylde Council notes that the CLLP has reached Regulation 19 stage on 24th February 2025. Under paragraph 234a. of the National Planning Policy Framework (December 2024), providing that the draft housing requirement meets at least 80% of local housing need (considered below), this means that the policies of the December 2024 Framework would not apply, and instead the policies of the previous (December 2023) Framework would apply.

Housing Need and Housing Requirement

Fylde Council notes the housing requirement figure proposed in the CLLP to be 1,314, based on an employment-led need calculation of 1,237, with an additional uplift applied to equate to 80% of the new standard method. This gives a total requirement of 23,652 homes in total. Fylde Council has no concerns with the approach taken to the calculation of housing need and housing requirement.

The approach to how the needs will be met is unclear. At the Duty to Co-operate meeting held on 6th November 2024, the Central Lancashire Authorities stated that Central Lancashire was expecting to be self-reliant for meeting their housing need. The CLLP states that *"Policy HS1 seeks to meet housing needs in Central Lancashire"* (paragraph 4.11). In paragraph 4.22 it states *"In addition to the strategic site allocations set out in Chapter 3 a series of sites for housing have been allocated in the CLLP to provide a sufficient supply of homes across Central Lancashire. Housing site allocations for each local planning authority area are set out in the following three policies"*.

However, the total number of homes provided through the strategic sites would be approx. 6,812, and the sum of the other allocations in the three boroughs is 7,996. This gives a total of 14,808. No further explanation is given in the main text or policies for the almost 9,000 home shortfall. The

trajectories set out in the appendices show that the shortfall is made up by existing commitments (6,499) and windfall allowances (3,139, of which none are in Preston) but no explanation or justification appears to be provided for these in the plan. At the Duty to Co-operate meeting of 6th November 2024, the other councils were asked if they would have capacity to take on need, although it is unclear why the question was raised if the intention is to provide fully within Central Lancashire. To provide certainty in the drafting of our own development plan, Fylde Council seeks clarification and confirmation in writing within the plan that Central Lancashire will meet its own needs over the full period of the plan.

Strategic Housing Sites

The CLLP includes strategic development sites SS3 and SS5 close to the boundary with Fylde. The sites represent a very significant urban extension; however, Fylde Council has some concerns about how the development will proceed and some potential impacts of the developments.

In the case of site SS3, although reference is made in the need for an infrastructure delivery schedule that it should be linked to the phases of development on the site, there are no specifications as to what those phases should consist of, nor to any limits to what development could take place prior to the provision of key infrastructure.

In the case of site SS5, the site is split into two phases, of which one is not anticipated to be commenced until after the plan period ends. Again, no specifications are made as to what development could take place, other than reference to masterplanning and an overall requirement for infrastructure.

Therefore, whilst it had been suggested at the Duty to Co-operate meeting of 6th November 2024 that the sites west of Preston would be long term allocations and were only in the early planning stage, allocation of these as strategic sites as currently proposed could result in development commencing very quickly. Fylde Council wish to stress that the sites should be developed only in a planned way, through pre defined phases and with specific infrastructure delivered at specified stages in the development of the wider sites, and that this needs to be set out in more detail in the plan.

Spatial Strategy Policy SS1 Development Patterns point 6 requires that development proposals should be safely integrated into their environments. This will apply particularly to the large edge-of settlement sites SS3 and SS5 close to/and adjoining the boundary with Fylde, where the context is a sparsely populated rural area. The impact on the surrounding landscape to the west will need to be mitigated: it is recommended that areas of strategic landscaping be identified within the allocations to achieve this.

The emergency planning zone for the Westinghouse Springfields nuclear site extends into the strategic site SS5, and much of site SS5 is in close proximity to what is nationally important green energy infrastructure. Consultation will need to be undertaken with the Office for Nuclear Regulation, Lancashire County Council's Emergency Planning Team and the site operators. If there is any suggestion that any current or proposed future operations at the Springfields site would be compromised by the strategic-sized housing development, the allocation should be modified or deleted so that the operation of the site can remain unhindered.

Retail centres

Policy EC11 includes the provision of new district centre at Preston West and Cottam, and new Local Centres at North West Preston / Bartle, and at Preston West. Whilst the policy requires appropriate uses within the centres, appropriate to the scale and function of the centres, it is unclear within the policy what this means. Although paragraph 5.39 provides clarification that they should mainly meet local needs, this should be contained within the policy itself if it is to prevent district centres becoming extensive areas of comparison retail that threaten the retail hierarchy and existing town centres outside the borough boundary e.g. at Kirkham. Similarly, additional provision of community facilities should not compromise those in Fylde, particularly in the adjoining rural area.

Fylde Council reserves its position in respect of attendance at the Examination in Public.

Should you have any queries regarding the above, please do not hesitate to make contact using the details above.

Yours sincerely

Mark Evans

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Head of Planning