

FYLDE BOROUGH COUNCIL

LOCAL PLAN TO 2032 EXAMINATION

Inspector: Mrs Yvonne Wright BSc(Hons) Dip TP MSc DMS MRTPI

Please direct all communications to:

Tony Blackburn, Programme Officer, 15 Ottawa Close, Blackburn, BB2 7EB.

Email: tony.blackburn@fylde.gov.uk

Tel: 01254 260286

Julie Glaister
Fylde Borough Council
(via email)

11 April 2017

Miss Glaister

Fylde Council Local Plan – Duty to Cooperate, Objectively Assessed Needs and the Development Strategy

1. Further to the Stage 1 examination hearing sessions held on 28 and 29 March 2017, I am writing to firstly set out my interim findings on the matter of the duty to cooperate. I am also requesting that the Council give further consideration to specific matters relating to objectively assessed housing needs and the development strategy. These matters are set out in this letter.

Duty to Cooperate

2. In respect of the duty to cooperate I have considered all relevant evidence presented both in writing and orally at the hearing sessions. The Council has submitted evidence that illustrates the extent and nature of engagement that has occurred on relevant strategic matters. I acknowledge that there is a strong possibility that Wyre Council may not be able to meet all of its objectively assessed housing need within its own administrative area. However I note that the emerging Local Plan for Wyre is at an early stage of production. I consider that there is insufficient evidence available at this time to ascertain with any degree of certainty the level of any unmet need and the proportion that may need to be accommodated in Fylde.

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3. I therefore consider that, when viewed in the context of what has been realistic and achievable, the engagement and cooperation that has taken place has maximised effectiveness in the preparation of the plan. Overall, therefore, the evidence before me at this point indicates that Fylde Council has met the statutory duty to cooperate as set out under Sections 20 and 33A of the Planning and Compulsory Purchase Act 2004.
4. I am not inviting any responses on this finding. My full reasoning will be set out in my report on legal compliance and soundness. Consequently, my intention is that the examination should now move on to the Stage 2 hearing sessions.

Objectively Assessed Housing Needs (OAHN)

5. Notwithstanding my interim findings on the duty to cooperate, paragraphs 1.24-1.28 of the plan do not provide a clear commitment as to the specific action the Council will take in relation to meeting any unmet OAHN from Wyre Council. The Council should therefore consider what commitments would be necessary to ensure the plan would be effective in this regard. Any potential modification to the plan should be set out in writing.
6. It is clear that the SHMA (2013) and its two addendums (2014 and 2015) have not used the most up-to-date population and household projections that are now available. In response to my initial questions to the Council and my Stage 1 Matters, Issues and Questions (MIQs) on OAHN, the Council submitted additional evidence including a sense check and update to the SHMA demographic projections (EL2.025b(ii) and EL1.011) which included reference to the 2014-based population and household projections. However the latter document EL1.011 was provided the day before the hearings were opened and so there was insufficient time for me or the representors to reasonably digest its contents prior to the hearings.
7. Notwithstanding this additional evidence it is still unclear to me what implications, if any, the ONS 2014-based sub-national population projections and the 2014-based sub-national household projections have on the OAHN for Fylde. Consequently I would be most grateful if the Council could provide further clarity on this matter. This should be in the

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form of a paper which sets out the 2014-based assessments using relevant scenarios (including economic) and takes account of all reasonable adjustments and uplifts as referred to in previous demographic evidence. It should also include an explanation as to what the implications of this are for the OAHN, including meeting affordable housing needs.

Development Strategy

8. Local Plan Policy DLF1 defines the development strategy for the Borough. It sets out a minimum number of new homes and a minimum amount of new employment land to be developed during the Plan period. It identifies four strategic locations (Lytham and St Annes; Fylde-Blackpool Periphery; Warton; and Kirkham and Wesham) and states that development of the strategic sites at these locations is key to ensuring that the development strategy within the Plan is achieved.
9. However the policy does not effectively set out the development strategy as it does not specify the amount of new dwellings proposed at each location, nor does it define what a strategic site is. Whilst Table 2 within the supporting text on page 41 of the Plan sets out the distribution of development within the Borough by referring to housing numbers at each location, this is not set out within the policy. Table 2 is also very specific numerically and refers to total rather than minimum housing numbers.
10. Furthermore, Policy DLF1 does not clearly define the difference between non-strategic development sites and non-strategic sites as referred to under sections headed 'Non-strategic locations' and 'Windfalls and small sites allowances'.
11. The Council should therefore consider what modifications would be necessary for Policy DLF1 to make it effective.

Next Steps

12. I would be most grateful if the Council could provide a written response on these matters by 1700 on Wednesday 3 May 2017.
13. Following this I am proposing to proceed to Stage 2 of the examination which will include consideration and discussion of the matters raised on

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OAHN and the development strategy within this letter. The dates for the Stage 2 hearings will be confirmed in due course, as will the publication of my Stage 2 MIQs.

Yours Sincerely

Y Wright

Inspector