

**Planning Committee**

**Wednesday 11 March 2020**

**Late Observations Schedule**

**Agenda Items**

**Item      Comments**

- 5      Following publication of the agenda, a letter was received from Wyre Council which is attached to this late observations schedule. Member's attention is drawn to the letter, which is self-explanatory. Clearly Fylde Council is committed to cooperating with Wyre Council in moving forward the reviews of the plans for both boroughs.

In recognition of this continued cooperation, in addition to the recommendations set out in the agenda item, members are invited to consider the following additional recommendation:

**3. Officers be asked to continue to liaise with Wyre Council in order to seek to address the issue of unmet housing need in Wyre.**

By Email Only:

[Julie.glaister@fylde.gov.uk](mailto:Julie.glaister@fylde.gov.uk); and  
[Eddie.graves@fylde.gov.uk](mailto:Eddie.graves@fylde.gov.uk)

**Ask for:** Steve Smith  
**Email:** [Steve.smith@wyre.gov.uk](mailto:Steve.smith@wyre.gov.uk)  
**Tel No:** 01253 887243  
**Our Ref:** DtC

**Date:** 6 March 2020

Dear Ms Glaister,

### **Duty to Cooperate and the Partial Review of the Fylde Local Plan to 2032**

Thank you for providing Wyre Council, alongside other statutory consultees, with a pre-consultation version of a number of documents relating to the partial review of the Fylde Local Plan to 2032. I have been able to respond on a number of matters through a recent Duty to Cooperate (DtC) meeting, in addition to email exchanges and phone conversations between members of your team and my own. This cooperation has been positive, ongoing and constructive and has resulted in some changes to the documents concerned; particularly the Statement of Common Ground (SoCG).

Despite best endeavours there still remain matters where agreement has not been reached by Friday 28 February 2020. I have sought to respond as quickly as possible given your intention to present your proposed partial review to your Planning Committee on 11 March 2020 for a decision on further progress. It may be of benefit if the contents of this letter are put before your Planning Committee on 11 March 2020.

The Wyre Local Plan 2011 – 2031 (WLP31) contains Policy LPR1, the contents of which are incontestable common ground and the confirmation of un-met housing need within Wyre, again incontestable common ground. This un-met need provides (in part) the justification for the review of the Fylde Local Plan to 2032 and a strong link between our two plans and their subsequent review.

Policy LRP1 sets out the steps that need to be undertaken as part of Wyre's Local Plan review in order to ascertain what proportion (if any) of the unmet need can be accommodated in Wyre. As set out above, Fylde's Local Plan review is justified in part by a commitment by Fylde to assisting Wyre meet residual unmet need.

It is therefore my view that the matters to be addressed by Policy LPR1 would most comprehensively be dealt with jointly between our respective authorities. That is, it is my view that our authorities should to work together to identify where the unmet need should be accommodated, and our plan processes need to be properly aligned to accommodate this.

As you will be aware, policy LPR 1 indicates that Wyre's Local Plan Review will include an update of Objectively Assessed Housing Needs.

Since the adoption of Wyre's Local Plan, NPPF 2019 has introduced the Standard Methodology for the purpose of determining the minimum number of homes required in the

area for the purpose of strategic policy making. The adopted policy figure in Wyre's plan is higher than the standard methodology figure. Wyre is required, pursuant to policy LRP1, to update its housing needs assessment for the purpose of the review, and it is this process that will determine Wyre's housing need through the Local Plan Review.

Because the evidence base relating to the Objectively Assessed Need (OAN) that informed both our plans was/is shared and was jointly commissioned; namely the Strategic Housing Market Assessment (SHMA), and because Fylde is considering its own housing needs through its own review, I consider that housing need is an issue that should be jointly considered by our authorities.

Policy LPR1 also requires a review of transport and highway issues, taking into account the matters specified in the policy. Similarly any review of the transport and highways infrastructure matters affecting Wyre could be dealt with jointly given the cross-boundary nature of the road network (both local and strategic), and also given that the outcome of the assessment will assist in informing the authorities of the degree to which Fylde may need to assist Wyre in meeting any unmet needs that cannot be accommodated in Wyre.

I would therefore like to propose that we agree to jointly review the above matters to further inform the partial review of both our plans, providing the opportunity to achieve a consistency of approach between our two authorities and their plans. In my view this is the best way to review our respective plans for our shared housing market area, and to ensure that housing needs are properly planned for and met across the HMA.

I also consider that an alignment of plan making timescales with the potential to more effectively deal with the matter of un-met housing need should be considered.

In the coming weeks I will be seeking quotations from Turley and Lichfields who both provided evidence for the WLP31, and in the case of Turley the SHMA that we both share. I would very much like to include cross boundary assessments of need as part of this/these commission(s) and I await your response to my proposal so that this evidence gathering can begin expediently. I will also be happy to discuss a common plan making timetable with you.

For the avoidance of doubt the full OAN for housing in Wyre is 479 dpa, with the WLP31 providing only 460 dpa; thus establishing the un-met housing need as a matter of recently adopted policy. The housing requirement for Wyre can only be changed through the adoption of a reviewed local plan or through an entirely new local plan. Although the Government has introduced a Standard Method (SM) for the calculation of housing need, this is a starting point and it cannot be assumed that this will represent the final position for Wyre. Therefore we do not consider that reference to potential OANs or housing need figures for Wyre in any of the documents produced as part of your partial review can be accorded any weight at this stage. As set out above, we would however welcome the opportunity to work with you to undertake joint needs assessments for the purpose of our respective Local Plan reviews.

One final matter that I wish to draw your attention to is the fact that it cannot be assumed that Wyre Council, through the partial review process, will be able to meet housing needs in full within the Borough. The Inspector's Report into Wyre's Local Plan made it clear that further consideration needed to be given as to the extent to which any unmet need could be met in Wyre through a review of transport and highway issues. This is reflected in LRP1 (2). Until detailed consideration has been given to this issue through the review process, it has not been established that Wyre can meet any unmet needs within the Borough. Again, we would welcome the opportunity to work with you to undertake a joint review of transport and highway issues to ensure that housing needs are accounted for and met across the HMA.

Finally, I note that Wyre Council are currently consulting on the scope of a partial review. We will continue to seek to discuss any matters arising from that consultation with you in a positive and constructive way.

As always should you wish to discuss the content of this letter further, please do not hesitate to contact myself or indeed any other member of my team. I look forward to continuing the meaningful and ongoing engagement we have.

Regards

A handwritten signature in black ink, consisting of a stylized 'S' followed by a horizontal line that extends to the right.

Steve Smith  
Planning Policy and Economic Development Manager