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Our Ref: OAN/01

Your Ref: WOAN01

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Date: 18 May 2016

Dear Garry,

RE: WYRE LOCAL PLAN & DUTY TO CO-OPERATE

Thank you for your letter of 4 May 2016 regarding the duty to co-operate and, in particular, how Fylde Council can assist in the delivery of the Objectively Assessed Housing Need (OAN) identified in Wyre. Please accept my apologies for the delay in responding to your letter, as you will appreciate I had to have a number of conversations with colleagues to ensure that a full and proper response is provided to what is a very important matter for both authorities. Thank you for your patience.

As you are aware, Fylde Coast authorities have been working together in preparing the respective development plans. Although much of this co-operation has revolved around the production of a joint evidence base wherever possible, as a result of this co-operation Fylde Council has made a commitment to assist Blackpool in the delivery of their employment land requirements by providing an additional 14 ha of employment land within Fylde Borough to support their economic ambitions, demonstrating that Fylde Council is prepared to work with neighbouring authorities to support economic prosperity in the wider area.

Fylde is facing a number of challenges which would appear to be common with issues at Wyre. Firstly, Highways England have issued a holding objection to Fylde's emerging local plan stating serious reservations about the capacity of Junctions 3 and 4 of the M55 and the ability to accommodate traffic generated from development proposed in the hinterland to the junctions. The planning team believe that Highways England have raised similar concerns with regard to the impact on the junctions as a result of development in Wyre. If highway capacity at these junctions is an issue for Highways England, then the same constraints will exist if development is provided in Fylde rather than Wyre.

The capacity issues along the length of the A585 which you set out in your letter are well documented. If some of Wyre's OAN is met through additional development in Fylde, and as you state this higher OAN has been selected in order to support the economic aspirations of Wyre, then it is inevitable that there will be commuting

between the employment sites in Wyre and any additional Housing sites in Fylde adding to capacity issues on the A585.

Another issue currently impeding progress of the Fylde Local Plan is the impact of potential development sites on wintering wildfowl. Natural England (NE) have raised issues with the findings of the interim Habitat Regulations Assessment carried out on behalf of Fylde, expressing concern that the assessment does not adequately address potential impacts resulting from the loss of feeding sites used during the winter period by migratory swans and geese. Given the lack of previously developed land available in Fylde, it is inevitable that any additional housing sites will be located on green field land and the impact of the development of such sites on wintering wildfowl would need to be assessed and if necessary mitigated or compensated. Given that NE have expressed concern regarding the potential impact of the scale of development currently proposed in Fylde, it is clear that the impact of any additional development will have to be carefully and fully assessed.

The Fylde Coast Strategic Housing Market Assessment (SHMA) identifies an OAN for Fylde of 300-420 dwellings per annum. The Council has produced a housing figure assessment that indicates Fylde will seek to deliver 370 dwellings per annum. Unlike the approach taken in Wyre, the housing figure in Fylde is below the top of the identified range. In arriving at this figure, which has still to be tested at examination, Fylde has taken into consideration a number of restraining factors in the delivery of housing in the borough, including the ability of the housing industry to deliver housing at rates any higher than that put forward. In a recent consultation exercise, the Council received objections to the proposed housing figure from the housing industry and it is clear that these challenges will continue to the EiP. If additional housing land is to be made available in Fylde, there will be an inevitable question as to whether this additional land should be made available to achieve a higher OAN for Fylde rather than to address unmet OAN in Wyre. It would add value to discuss further the reasons Wyre has chosen to seek to deliver the full OAN at the higher end of its range given that there are a number of constraints to delivering this figure.

In respect to the difficulties of accessing land to the south east of Poulton-le-Fylde, any access to this site would either need to acquire existing property or be via a significant new access through Fylde Borough. Fylde has consistently supported the construction of the "Blue Route" to address the traffic issues on the A585 and if an access to this area can be designed in such a way as to provide wider strategic benefits to the area, Fylde members may be minded to support such a proposal.

The final decision in regard to any additional land that can be made available within Fylde Borough to assist Wyre in the delivery of its OAN would rest with elected members. Fylde has experienced a number of challenges to the emerging plan from elected members and third parties who wish to see the scale of new development in Fylde curtailed with several challenges ongoing. Equally, new road schemes have been considered and whilst these have been supported by local members were they will address congestion and improve safety on the existing network, new roads that could potentially bring further traffic to existing bottlenecks may not receive the same level of political support.

In light of the above, I would suggest that a meeting of the Joint Member and Officer Advisory Steering Group established under the Governance arrangements of the Fylde Coast Memorandum of Understanding is convened as soon as practical in order to explore how best to address the issues raised and allow discussed in the political arena.

Given the pressure to deliver an adopted plan, I would not want any delay in the production of either local plan and this is a message that has been reinforced by Members. Whilst Fylde is more than willing to explore how to assist Wyre in the delivery of its OAN, it is not possible to commit to any action that would delay the production of Fylde's plan. A number of additional appraisals will be required in order to ensure that the potential impact of any further development can be fully assessed that are likely to take additional time and resource. I am aware that a number of local authorities faced with similar requests have moved their plans forward with a view to an early review and that this approach has been accepted by several local plan inspectors. The planning team have recently met with representatives from the Department of Communities and Local Government and are scheduled to meet with a representative of the Planning Inspectorate to ensure the local plan can move forward as swiftly as possible. I will ask the team to raise the issues you have presented with the inspectorate in order to obtain their advice.

I am confident that we can find a way to ensure that both local plans do not get delayed as a result of this issue and look forward to working with your team to establish the best way forward.

Yours sincerely,



ALLAN OLDFIELD
CHIEF EXECUTIVE