

Together we make a difference...

Julie Glaister  
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Ask for: Réa Psillidou  
Email: Rea.psillidou@wyre.gov.uk  
Tel No: 01253 887243  
Our Ref: Wyre LP

Date: 9 May 2017

Dear Julie,

**RE: Wyre Local Plan and Duty to Cooperate**

I am writing with reference to the duty to cooperate meeting last Friday 5 May 2017. You will recall that I asked how Fylde was intending to amend paragraphs 1.24 – 1.28 in the Fylde Local Plan. Your response was that this is not public information and effectively Wyre will have to wait until a response to the matters raised by the Inspector was published. It was disappointing that you were not prepared to discuss this matter.

The issue of a shortfall in delivering housing to meet identified needs within the HMA is an important cross boundary strategic issue and one of particular relevance and interest to Wyre as the shortfall arises in Wyre. How Fylde intends to respond must be a matter for discussion at the duty to co-operate meetings. Ideally it is a matter to be agreed between us prior to Fylde submitting modifications. I was expecting Fylde to engage with Wyre on this matter prior to resuming the hearing sessions on the Fylde Local Plan.

I am disappointed that your approach is not conducive to effective co-operation to resolve issues. Effectively Wyre will need to comment on the proposed modification and if Wyre is not satisfied that the modification provides a clear commitment to address the issue, then Wyre's only redress is to raise issues with the Inspector. Effectively you are treating Wyre as another consultee and not as an adjoining authority with whom you have a duty to co-operate on issues. Your approach to duty to cooperate does not add any value to consultation.

I will be sending a copy of this letter to the Inspector.

Yours sincerely,



**Réa Psillidou (Miss)**  
**Planning Policy and Economic Development Manager**



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**Ask for:** Réa Psillidou  
**Email:** Rea.psillidou@wyre.gov.uk  
**Tel No:** 01253 887243  
**Our Ref:** Wyre LP

**Date:** 12 May 2017

Dear Julie,

**RE: Wyre Local Plan and Duty to Cooperate**

Following my letter dated 9 May 2017, I became aware that your position with regards to how Fylde proposes to amend paragraphs 1.24 – 1.28 had already been determined prior to our last meeting on the 5 May 2017, in a letter to the Inspector dated 3 May 2017. I checked your Local Plan examination web-pages yesterday, in view of the Programme Officer's e mail that your deadline for responding was extended to 10 May 2017.

As indicated in my last letter your approach to 'duty to co-operate' is disappointing but also frustrating.

Under the duty to co-operate requirements it is necessary that we meet to discuss your proposed modifications and in particular your proposed modification to paragraph 1.24 – 1.28 as set out in your letter to the Inspector dated 3 May 2017 and also in your schedule of 'Proposed Modifications'.

Your proposed modifications to the said paragraphs do not go far enough in satisfying the Inspector's concern that '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'

As in previous communications between us, you continue to place an emphasis on the fact that the 'precise' number of shortfall is not known. You are aware however that there is at least a shortfall of 1400 dwellings which you have not challenged either in terms of the Wyre's OAHN or the Highways Evidence which in the main creates the shortfall. It is not necessary to know the 'precise' figure of the shortfall in order to respond to the request for assistance which in any event will be clarified in the next few weeks.

Another issue you raise in the proposed modifications which I assume you feel hinders you to consider the matter is the timing of our respective plans. More often than not plans of different authorities will not align. This is not particular to our situation. Your plan needs to be flexible and include contingencies to deal with future circumstances within the HMA, in this case imminent and not unforeseeable circumstances which is the shortfall in meeting housing need in Wyre.

The substance of your proposed modifications is that you 'will undertake an early review of the Fylde Local Plan' and that the 'objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other locations where consistent with the achievement of sustainable development'.

I do not agree that a review is the most effective response to the issue. The plan strategy could include contingency measures indicating areas of search to meet the shortfall, stipulating what additional work needs to be undertaken. Nonetheless if the Inspector, agrees that a 'review' is an appropriate response to the situation, the plan will need to indicate what will trigger the review and what 'specific actions' you will undertake in considering how you will assist.

A meaningful duty to co-operate meeting is clearly required to discuss the proposed modifications and to seek to reach agreement. I await your response with suggested dates for such a meeting.

I will be sending a copy of this letter to the Inspector and I might need to use it in evidence together with my previous correspondence at the examination.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R Psillidou'.

**Réa Psillidou (Miss)**  
**Planning Policy and Economic Development Manager**