



Ms R Psillidou
Planning Policy and Economic Development Manager
Wyre Council
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Our Ref:

Your Ref:

Please Ask For: Mr M Evans

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Date: 23rd January 2017

Dear Ms Psillidou,

RE. WYRE LOCAL PLAN & DUTY TO CO-OPERATE

I am writing to you following the recent Duty to Co-Operate Officers meeting of 14th November 2016. During the meeting you explained that highways evidence was still awaited detailing the reasons why Wyre would be unable to meet its objectively assessed need for housing. This letter is intended to clarify the information that Fylde Council would need to be provided with if it is to consider your request for assistance in meeting your Objectively Assessed Need (OAN) by providing housing sites in Fylde.

To date, the development strategy for Wyre has not been seen. It is anticipated that the strategy would include a full explanation of the constraints, including highways capacity. It would be unusual for evidence supporting a strategy to be presented without even any outline of the strategy, or the alternatives to it that have been considered, being readily apparent. However, the following comments are based on the approach that it is understood is being taken.

We understand that the highways evidence to be brought forward is to be centred on A585/A588 (Breck Road) junction. We would expect that this evidence would provide an understanding of the limits to development that result from this capacity restriction. We would expect that this evidence would address all reasonable development strategies for Wyre that would deliver the full OAN and how their delivery would be constrained by the limited capacity of this specific junction.

The proposed Windy Harbour – Skippool major scheme currently being promoted by Highways England is likely to have a significant impact on traffic flows on the A585 corridor and at its junctions, and may lead to alterations in the routes taken by traffic, for instance between Over Wyre and Blackpool. We would expect all such effects of this scheme to have been considered, in relation to the impacts of any potential development strategy.

It is understood from previous correspondence and Duty to Co-Operate meetings that the emerging plan will include provision of a new Normoss to Little Singleton distributor road, to which Fylde Council has indicated in-principle support. Clarification will be required on how the effects of this proposed road on the wider road network have been considered, in particular potential displacement of traffic from the A585/A588 junction. The submitted Fylde Local Plan to 2032 and the Fylde Coast Highways and Transport

Masterplan both make provision for the “Blue Route” major road scheme: we would welcome consideration of the integration of the proposed distributor road into the “Blue Route” proposal.

We would also expect that sustainable transport projects that could have an impact on mitigating the impact of traffic in the A585 corridor will have been considered and evidence provided on the potential effects as part of your highway evidence.

Wyre Council has, in the letter of 5th May 2016 sent to the Chief Executive of Fylde Council, requested that Fylde Council should allocate land in order to meet the shortfall in the number of new homes that Wyre Council states that it is unable to accommodate, to meet Wyre’s OAN. The OAN is based on economic forecasts for Wyre. Therefore, it can be reasonably expected that any homes justified outside Wyre to meet Wyre’s OAN would result in journeys into and out of Wyre for employment and other purposes. We would expect that the impact on the road network of those homes which Wyre Council proposes be located in Fylde, including the particular highway pinch points identified as constraints, will have been assessed as part of any work undertaken. Evidence would need to be provided, that homes so located would not have any significant detrimental impact on those parts of the highway network that are stated to represent a constraint on development, based on the high economic growth forecast on which the OAN is predicated. Further, we would need an indication of the broad area within Fylde where such homes could be located if they are to contribute to supporting Wyre’s economic growth aspirations, whilst not having detrimental impacts on the highways concerned, backed up by highways evidence.

It would also be expected that evidence be presented as to why transport should be a constraint in those parts of Wyre outside the peninsula area/A585 corridor. Whilst the Fylde Coast Highways and Transport Masterplan provides background, we would expect evidence demonstrating consideration of questions such as the following:

- What level of development will be possible on the A6 corridor once the Broughton bypass is complete?
- What engineering solutions to the capacity problem of M55 Junction 1 have been considered and what effect would they have on the level of development that could be accommodated?
- What effect would sustainable transport solutions/mitigation have on the level of development that could be accommodated, and what have been considered e.g. parkway station at Brock?
- What other highway schemes have been considered that would mitigate impacts of development, and what effect would they have on the amount of development that could be accommodated?
- How will changes to traffic flow patterns that will follow the completion of the Preston Western Distributor road provide relief within the A6 corridor, and how would this affect the amount of development that could be accommodated?
- What range of development strategies have been considered and how are each impacted by the constraints identified?

It is anticipated that evidence would be provided detailing what level of development would be necessary to provide sufficient funding for a key piece of transport infrastructure. If such a strategy is rejected, it is expected that the reasons for its rejection would be clearly stated and backed by evidence.

In respect of other evidence, the Green Belt study of 2016 is acknowledged. Fylde Council recognises the importance of the Green Belt to Wyre, and that given the importance afforded to Green Belt land in national policy, release of sites beyond those identified in the study is unlikely to be acceptable.

In respect of flood risk, it is understood that a Level 1 Strategic Flood Risk Assessment has been completed, but this does not provide conclusions as to the availability of sufficient sites in the borough to accommodate development to meet the OAN. Clarification will be required as to the reasons why land in Flood Zone 1 could not be used.

It is stressed that the above evidence is likely to be regarded as essential in supporting Wyre's development strategy within your Local Plan, irrespective of any cross-boundary concerns.

In consequence of any conclusions on highways evidence that are reached, it will be necessary for the following questions to be answered, with supporting evidence, in order to provide a summary position:

1. Is Wyre's OAN set at the correct level?
2. Is it reasonable for Wyre to seek to meet its OAN in full, given the apparent significant constraints to delivery?
3. What quantum of the OAN is Wyre looking to be accommodated in Fylde, as opposed to other neighbouring authorities?
4. Can that quantum be accommodated sustainably within Fylde?

It should be clearly understood that this letter is simply to help explore the evidence that will be presented. Any decision of Fylde Council relating to the provision of homes, allocation of land or provision of cross-boundary infrastructure would be for the members of Fylde Council to make. The Fylde Local Plan to 2032 has been submitted for examination in public and any decision to include a significant number of homes to assist Wyre would require a new development strategy for Fylde. In order that the progress of the Fylde Local Plan is not compromised, any decision to provide homes to assist Wyre would therefore have to be through a later version of the plan, or an early review, following adoption of the submitted plan. Fylde Council is committed to continuing to work with Wyre in the development of its Local Plan and supporting evidence.

I look forward to our meeting, which I understand you will arrange, for the presentation and discussion of the evidence. We would be happy for representatives of Highways England and Lancashire County Council Highways to be in attendance in support, if you would consider that helpful. In the meantime if you require any further information, please do not hesitate to contact me on Tel. 01253 658460.

Yours sincerely



Mark Evans
Head of Planning & Regeneration



Garry Payne
Chief Executive
Wyre Borough Council
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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 though 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