
OPENING STATEMENT ON BEHALF OF FYLDE BOROUGH COUNCIL

Introduction

1. Fylde Borough Council is committed to the plan-led system. The FLP32, adopted in October 2018, is working well. It is delivering the homes and jobs needed to allow the Borough to grow sustainably and is safeguarding important assets from inappropriate development. The clearest indication of the FLP32’s success is the fact that the Council is one of only a handful of authorities in the country which have successfully had an Annual Position Statement approved by the Planning Inspectorate. Confirmation of the Council’s deliverable housing supply has been confirmed not once but twice.
2. Nonetheless, it would not be right to rest on these laurels. For two reasons the FLP32 is being reviewed, albeit in a focused way. First, §1.27 of the FLP32 promises an early review of the Plan to consider the unmet needs of Wyre Borough Council and the Council is honouring that commitment. Second, the FLP32 was examined under NPPF 2012. National policy has moved on, not least in relation to the way in which housing need is calculated. The people of Fylde deserve an up-to-date set of local policies to direct development to the most suitable locations in a clear and predictable way.
3. Given the relatively narrow scope of the Review, the issues are limited. We will consider them during the Hearings so in Opening, we will simply highlight the salient points.

Duty to Cooperate

4. Discussions between the Council and its neighbours, especially Wyre BC, have been ongoing and productive noting of course that the Duty to Cooperate does not mean a duty to agree.

5. The Council has not lost sight of the requirement to consider Wyre’s unmet need. Indeed, this has been at the top of the agenda during DtC meetings. However, the position is that Wyre’s own Plan Review has been delayed and there is no clear and robust evidence as to the level of Wyre’s unmet need as their housing policies move forward, if in fact there will be any unmet housing need at all. It would be quite wrong (as some representors suggest) to await the outcome of Wyre’s own needs assessment and its proposed response before proceeding with the FLP32 Review. The Government’s clear message is that authorities should have up-to-date Plans in place by 2023. Fylde BC, quite rightly, has heard this message and is responding to it.
6. That being said, the Council’s approach to identifying its housing requirement as a range provides a suitably flexible way to react to the unmet needs of its neighbour, when Wyre’s needs have been assessed and **if** they are unable to meet them.
7. The DtC, along with other legal requirements of the Review, has been satisfied.

Housing Requirement

8. The NPPF could not be clearer. Local Housing Need (“LHN”) should be calculated using the Standard Method save in exceptional circumstances. The Standard Method number would meet the needs of the Borough but rather than replacing the currently adopted requirement of 415 dpa the Council has devised an elegant response to the NPPF 2019.
9. A range of 275 – 415 dpa is not only permitted by national policy and guidance but it has a number of singular advantages:
 - a. It ensures that minimum housing needs are satisfied in a way envisaged by the Government’s policy changes as part of its aim to deliver 300,000 homes per annum nationally;
 - b. It secures the delivery of the local plan development strategy and the strategic sites within it;
 - c. Since the 5 year supply will be assessed by reference to the lower figure, there is little risk that the FLP32 (as reviewed) will be found to be out-of-date. This approach ensures that one of the central planks of Government policy – the planned system – is met;

- d. It provides sufficient flexibility to accommodate Wyre's unmet housing need (if in fact there is any) whether that be the unmet need set out in the Wyre Local Plan as currently adopted or any reasonable assessment of need contained in a revised plan.
10. The Council's approach is entirely sound.

Other Matters

11. There are a number of additional and discrete policy changes that are required in order to bring the FLP32 in line with up-to-date national policy. Although a few representors have passed comment, we are sure that the Inspector will recognise the sense and soundness of the amendments.
12. Accordingly, in due course we anticipate that the Inspector will be able to confirm the soundness of the Partial Review of the FLP32 and to allow it to move to adoption, save for such modifications as are necessary.

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JONATHAN EASTON
KINGS CHAMBERS
MANCHESTER-LEEDS-BIRMINGHAM
COUNSEL FOR FYLDE BOROUGH COUNCIL