

Mr S. Smith
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Our Ref: Wyre PR Hearing

Your Ref:

Please Ask For:

Telephone:

Email:

Date: 23 November 2022

Dear Mr Smith

Examination of the Wyre Local Plan Partial Update (2011-2031)

Consultation on the Proposed Main Modifications

Thank you for your letter dated 12th October 2022 inviting representations on the Main Modifications proposed in the schedule.

Fylde Council notes the proposed revisions to the housing requirement figure to 479 for the period 2011-19 and 296 for the period 2019-31. This ensures that, on adoption of the Partial Update, Wyre's housing needs are met in full in Wyre for the whole plan period, without reliance on the elevated housing requirement in Fylde that currently provides 380 dwellings. The changes have been applied consistently through the plan including the monitoring framework.

The section under 1.4 detailed in MM14 deals with the issues of housing need as it affects neighbouring authorities. The section recounts in detail the story of how the 380 dwellings of unmet need arose, but the section which provides the current position (paragraph 1.4.8) makes no mention of the previous unmet need other than to state that there is none now. Having gone into such detail concerning the previous position, the current wording will leave an uninitiated reader wondering what the actual position now is regarding the 380 dwellings; to some it could leave the implication that the previous unmet need will remain met in Fylde. For the clarity of the plan, ensuring that it is effective and that all can see that it is positively prepared, it is suggested that:

- Proposed paragraph 1.4.7 should stress that the unmet need was the previous position. It could achieve this by revision to: "accommodated Wyre's previous unmet housing need of 380 dwellings, the equivalent to 30 dwellings per annum for the period 2019-2032, as part of its housing requirement, prior to the Partial Update of the Wyre Local Plan".
- Proposed paragraph 1.4.8 should carry a specific reference to the previous unmet need of 380 dwellings (including use of that number in the text) and explain that it is eliminated by the Partial Update. Following on, it is suggested that, to ensure that explanation is sufficiently full to be clear, the paragraph should state "There is no longer any housing need arising in Wyre that requires the provision of the 380 dwellings provided in the Fylde Local

Plan to 2032 (Incorporating Partial Review)" or words to that effect.

Fylde Council and Wyre Council will continue to work collaboratively once the final form of the Main Modifications is known to update the Statement of Common Ground (in line with PPG Paragraph: 020 Reference ID: 61-020-20190315), which previously had areas of disagreement. It could be helpful for the consistency of the plan ensuring its effectiveness going forward, to make reference in the text to the updated SoCG within paragraph 1.4.10, perhaps by giving the full title of the document Statement of Common Ground and Duty to Co-Operate Statement, and include a commitment to update to reflect the adopted position.

Additional minor matters which we hope will assist:

- in MM13 the first revision to introduce the word "Update" is not accompanied by the corresponding deletion of "Review": we presume this is an error as "Review" is deleted in similar circumstances throughout the rest of the document;
- Paragraph 1.4.4 (MM14): we think it should read "meeting" rather than "meetings"

If you have any queries regarding any of the above please do not hesitate to contact me.

Kind regards			

Head of Planning