

PUBLICATION DRAFT WYRE LOCAL PLAN PARTIAL REVIEW (2011–2031)

Draft

Statement of Common Ground

and

Duty to Co-operate Statement of Compliance

Date: November 2021

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Preface

- This draft Statement of Common Ground and draft Statement of Compliance with the Duty to Co-operate (henceforth referred to as "this Statement") has been prepared to inform and accompany the Publication Draft Wyre Local Plan Partial Review (2011-2031) - Schedule of Revisions to the Wyre Local Plan (2011 – 2031) (the Schedule of Revisions). Taken as a whole it is the council's Statement of Common Ground and Statement of Compliance with the Duty to Co-operate. It explains how the council has met the Duty to cooperate in the production of the reviewed Wyre Local Plan.
- Preparation of the Wyre Local Plan Partial Review (2011-2031) has taken place over a relatively short period of time consistent with its limited scope. Nevertheless, a key aspect of plan preparation has been on-going and constructive dialogue and cooperation with neighbouring authorities and other key stakeholder organisations on strategic matters.
- 3. This Statement is in three parts:

Part 1 of this document provides the background to the Wyre Local Plan Partial Review (2011-2031) in the context of Duty to Co-operate and Statement of Common Ground. It describes:

- The legislative and policy context which establishes the Duty to Co-operate.
- The borough's strategic geography and importance of the Fylde Coast subregion as an area across which common strategic issues are relevant.
- Existing formal arrangements for co-operation across the Fylde Coast.
- The background to the Wyre Local Plan Partial Review (2011-2031).
- The current planning position across the Fylde Coast Authorities (FCA), including where there are existing agreed Statements of Common Ground.

Part 2 of this document describes the strategic matters pertinent to the Statement of Common Ground and establishes where there is agreement amongst the relevant parties, and, conversely, if there is disagreement. Part 3 provides an overview of the engagement and co-operation that has taken place, and continues to be undertaken, throughout the preparation of the partial review.

4. This November 2021 edition of the Statement of Common Ground and Statement of Compliance supports the Publication (Regulation 19) edition of the Wyre Local Plan Partial Review (2011-2031). It has been prepared in-line with the National Planning Framework 2021 (NPPF21) and Planning Practice Guidance (PPG). It is important to note that this is a working document, reflecting the fact that co-operation is ongoing in relation to the issues identified and that this will evolve as plan making progresses across all the local planning authorities identified below. Prior to the formal submission of the Wyre Local Plan Partial Review (2011-2031) for examination it will be updated to reflect where necessary and appropriate changes in circumstance and opinion, and to reflect comments received during consultation on the Publication documents.

Part 1 – Background

1. Legislative and Policy Context

- 1.1 Section 110 of the Localism Act introduced the duty to cooperate by amending the Planning and Compulsory Purchase Act 2004 ('the Act') to make provision for consideration of the duty in relation to planning for sustainable development in the preparation of Local Plans.
- 1.2 Section 33A of the Act defines the duty and sets out its general requirements. It confirms that the duty applies to all local planning authorities and county councils in England and to a number of other "prescribed bodies". The Duty to Co-operate is concerned with planning for sustainable development and the use of land so far as it relates to a "strategic matter" that has or would have a significant impact on at least two planning areas. The Act requires all identified bodies to be proactive and to engage in a constructive manner and on an ongoing basis to ensure effective planning in relation to the strategic matters.
- 1.3 The 'duty to cooperate' applies to public bodies prescribed in regulation 4(1) and 4(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). These bodies include the Environment Agency, Historic England, Natural England, the Civil Aviation Authority, Home England (formally the Homes and Communities Agency), National Health Commissioning Board, Clinical Commissioning Groups, The Marine Management Organisation, National Highways (formerly Highways England), the Local Enterprise Partnership and Local Nature Partnerships.
- 1.4 Section 20(5) of the Act, which sets out the purposes of the independent examination of development plan documents, states that one of the key purposes of the examination is to establish whether the local planning authority has complied with any duty imposed on the authority under section 33A in relation to the preparation of the Plan.

National Planning Policy Framework, 2021

1.5 The NPPF was updated in July 2021. It provides guidance on complying with the duty to cooperate and planning strategically across local boundaries. §20 provides guidance on the matters local plan strategic policies are expected to address, including making sufficient provision for housing in the context of an overall strategy for the pattern, scale and design quality of places. The section on "Maintaining effective co-operation" remains unchanged. §25 states that strategic planning authorities should collaborate to identify relevant strategic matters and engage with local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils and infrastructure providers. §26 promotes effective and on-going joint working between the policy-making authorities and relevant bodies as an integral component of positive plan making whilst §27 retains the requirement for a Statement of Common Ground as evidence of effective and on-going joint working on strategic matters.

Planning Practice Guidance

- 1.6 The Planning Practice Guidance (PPG) on Plan Making was first published in 2018 and updated in 2019 and 2020, the latter to provide guidance on the implications for plan-making of the COVID-19 pandemic. It provides further guidance on a range of issues, including compliance with the duty to cooperate and was updated in 2019 to include guidance on the production of statements of common ground. The PPG states that such statements form part of the evidence required to demonstrate that plan-making authorities have complied with the duty to cooperate (paragraph: 010 reference ID: 61-010-20190315).
- 1.7 The PPG makes it clear that the updating or reviewing of plans is subject to the Duty to Co-operate and by extension the need to produce a Statement of Common Ground. The PPG makes it clear, however, that the level of cooperation is expected to be proportionate to the matter at hand and should not unduly delay any plan review (paragraph: 075 reference ID: 61-075-20190723).
- 1.8 The content and format of this Statement has been informed by this guidance and the strategic matters considered therein are restricted directly to those

relating to the Wyre Local Plan Partial Review (2011-2031) and to the process for undertaking the review.

2. Wyre Spatial Geography

- 2.1 Wyre is a Lancashire coastal district bounded by the sea along parts of its western and northern boundaries. The borough covers an area of approximately 282 square kilometres. Wyre contains an estimated 110,261 residents (mid-2016) with a larger proportion over the age of 45 and lower proportions across all age groups under the age of 45 than for Lancashire, the North West and England.
- 2.2 Wyre is characterised by a distinct geographical polarity, with the main urban areas situated in the west of the Borough, adjacent to the borough boundary with Blackpool, and a large expanse of rural area to the East.
- 2.3 Wyre shares a common land boundary with the City of Lancaster to the north, with the Boroughs of Ribble Valley, City of Preston and Fylde to the east and south respectively, and with Blackpool Unitary Authority along the remainder of its western boundary. The Irish Sea to the north and west falls under the planning jurisdiction of the Marine Management Organisation Marine Plan area 10 North West inshore).
- 2.4 Wyre, Fylde and Blackpool form the Fylde Coast sub-region which is also known as the Fylde peninsula. Figure 1 shows Wyre Borough Council in relation to the neighbouring local authorities.

Figure 1: Neighbouring Authorities to Wyre Council



- 2.5 The borough of Wyre extends a considerable way inland in the east and includes part of the Forest of Bowland Area of Outstanding Natural Beauty (AONB). The northern coastline from Fleetwood to Pilling form part of Morecambe Bay which continues along the coastline to Barrow in Cumbria.
- 2.6 In comparison to neighbouring authorities, especially Lancaster to the north and Preston to the south, Wyre has relatively poor road access. Although the M6 motorway cuts through the eastern part of the Borough, there are no junctions on this stretch of the motorway. The A585(T) and A6 link the principal towns in the Borough to the motorway network. However, both of these routes are largely single-carriageway roads that can experience significant congestion at certain points during peak times. Public transport provision includes a network of bus routes connecting residents to destinations within the Borough and beyond including Blackpool, Lancaster and Preston. Some settlements do not however have access to a bus and there is only one railway station in the Borough at Poulton-le-Fylde.

2.7 The landscape across the sub-region is broadly similar, largely falling within the Lancashire and Amounderness Plain National Character Area (NCA), but with a portion of the North Wyre coast within the Morecambe Coast and Lune Estuary NCA. The sub-region encompasses part of the Forest of Bowland AONB.





- 2.8 In 2014 Blackpool, Fylde and Wyre Councils jointly published a Fylde Coast Strategic Housing Market Assessment (SHMA), at the time forming part of the local plan evidence base in the three authorities. Notwithstanding some evidence of housing market connectivity between Wyre and its eastern neighbours at the margins of the borough – to the North East with Lancaster and to the South East with Preston - the SHMA identifies a strong level of gross migration flow between the three Fylde Coast authorities. It also observes that there is a high level of self-containment with regards flows of commuters and that the movement of people shows relatively limited flows with surrounding authorities. The analysis presented within the SHMA therefore indicates that the three authorities making up the Fylde Coast area operate as a relatively strong and distinct Housing Market Area (HMA).
- 2.9 Economically, the Fylde Coast sub-region of Wyre, Fylde and Blackpool demonstrates a high level of self-containment in terms of travel to work patterns

and economic functionality creating a functional economic market. Added to a shared tourism and cultural offer and a shared infrastructure including coastal tramway and strategic highway and rail networks.

- 2.10 This economic coherence is reflected in the establishment of the Multi Area Agreement in April 2009 and the Blackpool, Fylde and Wyre Economic Development Company in April 2010 (rebranded the Blackpool Bay Company (BBC) in 2011), to support local authority partnership working, co-ordinate and drive forward shared objectives and deliver a co-ordinated programme of capital investment. In 2018, the BBC was superseded by the Blackpool, Fylde and Wyre Economic Prosperity Board for the Fylde Coast that has a remit to help shape and drive economic development across the sub-area.
- 2.11 With regards to the other adjoining authorities Ribble Valley and Lancaster both lie in their own separate HMAs and Preston forms part of the Central Lancashire HMA which also includes Chorley and South Ribble.

3. Fylde Coast Authorities Memorandum of Understanding

- 3.1 On-going co-operation and engagement between the three FCAs and Lancashire County Council takes place under the Fylde Coast Duty to Co-Operate Memorandum of Understanding (MOU). The MOU (2015 update) is a document jointly created by Blackpool Council, Fylde Council and Wyre Council as the three Fylde Coast authorities with Lancashire County Council (LCC) as the upper tier authority (Annex 1). It formalises the dialogue that takes place between the four authorities, providing for cross-border co-operation and collaboration regarding relevant strategic matters to the area and ensuring that the requirements of the statutory Duty to Co-operate are met.
- 3.2 The MOU provides for regular meetings under the Fylde Coast Duty to Co-Operate banner. Quarterly Fylde Coast Duty to Co-operate Officers' Group meetings are held between officers from the Fylde Coast Authorities and LCC, where strategic planning issues are discussed (note that as a result of the COVID 19 pandemic and the disruption to working arrangements there was a reduced number of meetings over the 2020/21 period).

- 3.3 In addition to the officers' meetings, the MOU also provides for the Fylde Coast Authorities Joint Member and Officer Advisory Steering Group, which comprises councillors and senior officers from the Fylde Coast Authorities and LCC, to oversee the work under the Duty to Co-operate. A key remit of the Advisory Steering Group is to resolve difficult and sensitive issues, reaching common understanding.
- 3.4 This Statement will be subject to discussion leading to agreement at the Officers' Group and, if necessary, the Advisory Steering Group meetings and any changes to it will be subject to ratification by those groups as appropriate.
- 3.5 The Fylde Coast Authorities officers and members Duty to Co-operate meetings are effective mechanisms for ensuring that strategic planning issues that cross council administrative boundaries between the Fylde Coast Authorities are given due consideration, are planned for and are delivered effectively through the plan making process.
- 3.6 The Memorandum of Understanding (MOU) recognises the Fylde Coast as a distinct HMA and in relation to housing provision it states that the FCA agree to work together 'to reach a consensus on housing provision across the Fylde *Coast sub-region*'. As part of the preparation of what was to become the WLP31, the FCA co-operated on commissioning a joint Fylde Coast Strategic Housing Market Assessment (SHMA) that was published in February 2014. A joint addendum to the SHMA (Addendum 1 published November 2014) covers all three authorities and considers the 2012 Sub National Population Projections. Each authority subsequently commissioned further work to consider data relating to household and population projections and employment.
- 3.7 The Fylde Coast SHMA and associated addenda provided an assessment of the objectively assessed need (OAN) for market and affordable housing over the Wyre Local Plan 2011-2031 plan period. However whist this approach was consistent with the NPPF 2012, the 2019 edition at §60 states that the minimum number of homes needed should be informed by adopting the

standard method for assessing local housing need unless exceptional circumstances justify an alternative approach.

4. Wyre Local Plan Partial Review (2011-2031)

- 4.1 The Wyre Local Plan 2011 2031 (WLP31) was adopted on 28 February 2019 in accordance with the transitional arrangements in the National Planning Policy Framework (NPPF) published in July 2018 (and subsequently included in the revised NPPF of February 2019). The examination of the WLP31 was conducted in accordance with the 2012 edition of the NPPF. The statutory development plan also includes the Joint Lancashire Minerals and Waste Local Plan (the adopted Core Strategy and the adopted Site Allocation and Development Management Policies Local Plan).
- 4.2 The 2012 NPPF and relevant National Planning Practice Guidance (NPPG) provisions required the preparation of a Strategic Housing Market Assessment (SHMA) to establish the objectively assessed needs for housing (OAN). All three Fylde Coast (Blackpool, Fylde and Wyre) authorities jointly commissioned a SHMA with each individual authority subsequently commissioning addenda to update the original report for the purpose of local plan examinations. The OAN for the WLP31 is 479 dwellings per annum (dpa) between 2011 and 2031.
- 4.3 However, constraints imposed by the highway network led to a position whereby Wyre considered that it was unable to meet in full its housing need of 479 dpa, instead submitting a plan with a housing need of 460 dpa a shortfall of 380 dwellings over the plan period 2011-2031. In examining the Plan, the Inspector concluded that further work should be undertaken in respect of the highway constraints to understand whether Wyre could, in fact, meet the full OAN within the Plan period. The Inspector therefore suggested a two-stage approach, with stage 1 allowing the council to move to adoption (subject to main modifications), and stage 2 comprising a commitment to an early partial review of the Plan *"with a view to meeting the OAN within the Plan period"* (IR 78). The Inspector commented that this review should include review of transport and highway issues, including the effects of committed highway schemes, the scope for sustainably located sites and infrastructure

requirements (see paragraph 73 – 78 IR). Thus, the WLP31 sets an annual housing requirement of 460 dpa, establishing a total un-met housing need in Wyre of 380 dwellings over the plan period.

- 4.4 The scope of the partial review is established by LPR1 Wyre Local Plan Review, which, in summary, is to update the housing OAN, review the transport and highways matters and to review the allocation of sites to meet the full OAN. These are the specific matters for the review. There is no obligation upon the council to consider any other matters i.e. to take the review outside of the scope of LPR1, other than to take into account compliance with the NPPF21.
- 4.5 As part of the plan preparation stage and pursuant to Regulation 18¹, on 28 February 2020 the council issued a scoping letter for a consultation period of six weeks, closing on 14 April 2020. The purpose of the scoping consultation was to seek views on the scope of the partial review. The letter itself established two elements to the review - compliance with Policy LPR1 and conformity with the NPPF 2019, subsequently updated in July 2021 (see the council's Statement of Consultation).
- 4.6 As noted above the partial review does not encompass a full review of the WLP 31 and all of the strategic matters that such a process would consider. As any full review of the Local Plan will be subject to its own process (see below), this SoCG only addresses those strategic matters and organisations of relevance to those matters listed in Policy LPR1.
- 4.7 The timetable for the partial review as published in the Local Development Scheme (November 2021) is as follows:

Regulation*	Stage Description	Dates
Reg 18	Preparation of a local plan	February 2020 to October 2021
Reg 19	Publication of a local plan	November 2021
Reg 20	Representations relating to a local plan	November 2021 to January 2022
Reg 22	Submission of documents and information to the Secretary of State	April 2022

¹ The Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended)

Regulation*	Stage Description	Dates
Reg 23 & 24	EIP Hearing Sessions	Mid 2022
Reg 25	Publication of the recommendations of the appointed person ²	Late 2022
Reg 26	Adoption of a local plan	Late 2022

* The Town and Country Planning (Local Planning) (England) Regulations 2012 (As amended)

4.8 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and NPPF21 require local planning authorities review local plans within five years from the adoption date. It is intended that the WLP31 will be the subject of a full review of the Local Plan within the five-year statutory period. The council's latest Local Development Scheme (November 2021) establishes a timetable for the full review, with the plan preparation stage beginning January 2021 and adoption envisaged in 2024.

5. Neighbouring Authorities - Current Local Plan Position

Fylde Coast Authorities

5.1 The three Fylde Coast authorities of Wyre, Blackpool and Fylde have in place Development Plan Documents that provide a framework of strategic and nonstrategic planning policies. However, these plans do not align in terms of plan periods or, in the case of Blackpool, the type of DPD adopted. All three authorities are undertaking either partial reviews (Wyre and Fylde) or are producing a new DPD (Blackpool Local Plan Part 2).

Blackpool Local Plan 2012 – 2027

5.2 The Blackpool Local Plan comprises two parts. Part 1 is the Core Strategy which was adopted by on 20 January 2016 and provides the overall spatial vision, goals and objectives, spatial strategy and strategic policies for the area to 2027. This includes a housing requirement of 4,200 new homes over the

² See Procedural Practice in the Examination of Local Plans, Planning Inspectorate 2016 (4th Edition)

plan period and an employment land requirement of 31.5 hectares for the plan period.

- 5.3 The Local Plan Part 2 is the Site Allocations and Development Management Policies document that provides land allocations and further detailed development management policies. This document has been submitted for examination and when adopted will support the strategic goals, objectives and policies in the Core Strategy. Its policies will replace the current 'saved policies' in the Blackpool Local Plan (2006) once adopted.
- 5.4 The current Part 2 timetable is defined by the Blackpool Local Development Scheme published in June 2021 as set out below:

Task	Timescale
Evidence /Information gathering/stakeholder consultations and preparing a draft plan	September 2016 – February 2019
Consultation Scoping Document (Regulation 18)	June/July 2017
Informal Consultation Paper – Proposed Site Allocations and draft Development Management Polices	January/February 2019
Preparing the Publication (Proposed Submission) plan	March 2019 – January 2021
Publication Consultation (Regulation 19)	February/March 2021
Respond to representations and prepare for submission	March/April/May 2021
Submission to Secretary of State (Regulation 22)	June 2021
Examination (Regulation 23 and 24)	September/October 2021
Inspector's Report (Regulation 25)	December 2021
Adoption by Full Council (Regulation 26)	February 2022

5.5 Blackpool Council undertook Regulation 18 consultation on a ScopingDocument for the Part 2 document between 12 June 2017 and 24 July 2017.

This was followed by a Part 2 informal consultation paper in January 2019. This took into account the extant NPPF at the time (published 2018) but was not timed to be able to take into account the amended NPPF 2019. Blackpool Council published its Local Plan Part 2 (Regulation 19) document for a period of public consultation in February 2021 that ended 2 April 2021. Alongside the Part 2 document, Blackpool Council also published a draft Statement of Common Ground.

- 5.6 On the 18 June 2021, the Local Plan Part 2 and its supporting documents was submitted for independent examination to the Secretary of State for Housing, Communities and Local Government via the Planning Inspectorate. An Inspector has been appointed to examine the Part 2 document. It is understood that the Examination date has now been agreed and set with the Inspector as the 6th to 10th December 2021. The suite of submission documents includes a signed final Statement of Common Ground (see Annex 2).
- 5.7 At §1.18 the signed Blackpool SoCG notes:

.....During the development of [the Wyre Local Plan 31] a formal request in May 2015 was received by Blackpool Council to assist Wyre in meeting their objectively assessed need for housing. Blackpool Council was not in a position to be able to assist Wyre in accommodating any of its unmet need which was detailed in formal correspondence between the authorities during 2016 and 2017. With the adoption of the Wyre Local Plan in February 2019 the position remains unchanged in that it is not possible for Blackpool to accommodate any of Wyre's unmet housing need. This is the agreed positon between the two authorities.

5.8 At §1.23 in reference to the WLP 31 PR, the signed Blackpool SoCG states:

.....It is for the partial review to address the shortfall against the identified OAN in accordance with Policy LPR1, as stated in paragraph 10.4.2 of the Wyre Local Plan (2011-2031). The Partial Review will assess whether unmet need remains in the light of policy changes in NPPF19, with if necessary, a review of transport and highway issues and allocation of sites. The Partial Review will demonstrate whether any of Wyre's need cannot be met.

- 5.8 At §1.30 the signed Blackpool SoCG identifies four relevant strategic matters. These are:
 - Homes and jobs;
 - Retail, leisure and other commercial development;
 - Infrastructure; and
 - Climate change and natural and historic environment.
- 5.9 There are no issues of disagreement between Wyre council and Blackpool Council on these matters. Wyre council is a signatory to the Blackpool SoCG.

Fylde Local Plan

- 5.10 The Fylde Local Plan to 2032 was adopted on 22nd October 2018. The Plan includes strategic and non-strategic policies, allocates land for development and identifies land for protection.
- 5.11 The Fylde Local Plan to 2032 at §1.26 indicates uncertainty regarding the extent (at that time of writing) of Wyre's unmet needs and ability of other neighbouring authorities to meet any shortfall. The Plan notes that the difficulty has arisen because the production of plans has not been aligned. §1.27 explains how this position is taken into account by committing to an early review of the Fylde Local Plan stating:

Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively-assessed need for housing. Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed. Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development.

5.12 Accordingly, Fylde Council is in the process of undertaking a partial (as opposed to full) review of the Local Plan. The suite of submission documents includes a signed final Statement of Common Ground (see Annex 2). The

submitted and signed Fylde SoCG identifies three key strategic matters. These are:

- The timing of plan-making, revision and review;
- Housing needs; and
- Housing requirement.
- 5.13 There are no issues of disagreement between Wyre council and Fylde Council on the strategic matters. Wyre council is a signatory to the Fylde SoCG.
- 5.14 The partial review of the Fylde Local Plan has reached the Examination stage. Hearings took place on the 17 and 18 March 2021. The Inspector's Report was received on 28 October 2021. The Inspector concluded that submitted Partial Review Local Plan met the legal requirements of the Plan production process. On the Duty to Co-operate at §14 and §15 the Inspector found that:

.....Statements of Common Ground between the Council and the other authorities have been formally agreed. These provide records of the engagement that has occurred on relevant strategic matters......I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to cooperate has therefore been met.

5.15 On the matter of Fylde's housing need and the use of the Standard Method, at §25 and §26 the Inspector found that:

.....Through the partial review process, the Council has established a revised local housing need figure using the standard method. This results in the minimum local housing need being 275 dpa. In determining this figure the Council has followed the formula set out in the Planning Practice Guidance (PPG), which addresses projected household growth and historic under-supply. The Council's approach in using the standard method is justified and consistent with national policy.

The PPG identifies circumstances when it may be appropriate to plan for a higher housing need figure than the standard method indicates. Whilst I acknowledge that the FLP32 objectively assessed housing need is higher than

the standard method figure, this is based on assessments which were produced prior to the introduction of the new approach, and subsequent revisions to national planning policy and guidance. Furthermore, the affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. There is also significant economic uncertainty at present, and there are no specific growth strategies or strategic infrastructure improvements that would justify an uplift to the standard method figure. Accordingly, the housing need figure of 275 dpa for the period 2019-2032 is justified.

5.16 On the matter of Wyre's unmet need, at §27 the Inspector recognised the reality of Wyre's unmet need and the role of the Fylde Local Plan Partial Review in meeting that need. At §30 the Inspector states:

......Adding Wyre's unmet housing need of 380 dwellings would increase this figure to 7,275 dwellings. The Plan does not make any revisions to the existing housing land supply set out in the FLP32. This provides for 8,819 net new homes over the plan period and is fully justified, having been found sound in 2018. The housing land supply therefore significantly exceeds the 7,275 dwellings required to meet identified needs.

5.17 The Inspector goes on to state at §31:

Accordingly, given the Council's ability, through its existing housing land supply, to more than meet Wyre's identified unmet housing need of 380 dwellings over the plan period, I conclude that the Plan is modified to ensure the needs are met.....

5.18 The Inspector concludes at §30 that subject to Main Modifications to incorporate Wyre's unmet need within the housing need and requirement figures,

.....the revisions in relation to housing need and the housing requirement, have been positively prepared and are justified, effective and consistent with national planning policy. 5.19 At the time of writing (November 2021) Fylde Council is considering the Inspector's Report.

Lancaster City Council

- 5.20 On 29 July 2020 Lancaster City Council formally adopted its Local Plan which consists of two development plan documents – the Strategic Policies and Land Allocations DPD and the Development Management DPD.
- 5.21 To address in more detail matters relating to climate change, the City Council has launched an immediate Local Plan review to ensure that the aspects of this agenda are adequately considered and included in the document. It is noted that this review is narrowly focused on climate change mitigation and adaptation and does not include a review of housing needs. As such the Review will not consider issues relating to any unmet need in Wyre.
- 5.22 The City Council has undertaken a Regulation 18 scoping consultation to help the Council decide which planning policies should be re-visited in the review. The eight-week consultation took place from 25 September to 20 November 2020. Subsequently, under Regulation 18 the council consulted on a draft revised local plan (in two parts Part 1 comprising the draft revised Strategic Policies and Land Allocations DPD and Part 2 comprising the draft revised Development Management DPD) for an eight week period from 23 July 2021 to 17 September 2021.

Stage	Timeframe
Scoping (Regulation 18)	September to November 2020
Informal consultation on a draft	June to July 2021
document (Regulation 19)	
Publication consultation (Regulation 19)	September to October 2021
Submission	November 2021
Adoption	June 2021

5.23 The LDS (February 2021) establishes the review timetable as follows:

5.24 At the time of writing, Lancaster City Council have circulated for informal comment to a draft SoCG.

Preston City Council

- 5.25 Preston City Council is one of three Central Lancashire local authorities the others being Chorley and South Ribble. The three authorities have worked together under the Central Lancashire banner to produce a Core Strategy (adopted July 2012) which sets out the strategic planning policies including the setting of housing requirements, for Central Lancashire and is supported by the individual local plans, which were produced by each respective council in 2015. Of relevance to this SoCG, the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies DPD) was adopted in July 2015.
- 5.26 In 2018, a review of the Core Strategy and individual local plans was begun with a view to delivering a single Central Lancashire Local Plan (CLLP), reflecting both the shared strategic policy objectives and more detailed nonstrategic policies. An Issues and Option consultation was undertaken from November 2019 to February 2020, the outcome of which was reported in September 2020.
- 5.27 The Central Lancashire Local Development Scheme (LDS) published in February 2020 provides a timetable for the review process as follows:

Stage	Timeframe
Issues and options (Regulation 18)	November 2019 to February 2020
Preferred options consultation	June 2021 to August 2021
(Regulation 18)	
Publication consultation (Regulation 19)	October 2022 to December 2022
Submission	March 2023
Adoption	November/December 2023

- 5.28 The three Central Lancashire authorities have entered into a Joint Memorandum of Understanding and Statement of Co-operation. A Statement of Common Ground between the three authorities relating to the provision and distribution of housing land has been produced under the auspices of the MoU, the latest edition dated May 2020.
- 5.29 Wyre council is not a signatory to the SoCG reflecting the relative lack of interconnectivity on key strategic issues. Even so, the partial review of the

Wyre Local Plan (2011-2031) must have regard to the emerging joint local plan for Central Lancashire. However, the joint local plan remains at an early stage of production

Ribble Valley

5.30 The Ribble Valley Core Strategy to 2028 was adopted on 16 December 2014. This was subsequently followed by the Housing and Economic Development Development Plan Document (HED DPD), which was adopted in October 2019. The latest edition of the Ribble Valley LDS is dated April 2021 and indicates that the Core Strategy and HED DPD will be reviewed to create a Local Plan for the borough. The LDS indicates a Local Plan review timetable as follows:

Stage	Timeframe
Evidence Production	April 2021- December 2021
Issues & Options	January 2022
Publication	July 2022
Submission	December 2022
Examination	May 2023
Adoption	November 2023

5.31 At the time of writing evidence gathering remains in progress.

Part 2 – Statement of Common Ground

1. Introduction

- 1.1 The ability to evidence positive joint working between the plan-making body and relevant bodies is an integral part of producing a positively prepared plan that considers strategic matters and infrastructure requirements across geographical and organisational boundaries. It is in this context that the NPPF21 at §27 requires as part of the plan-making process a statement of common ground (SoCG) as a written record of the progress made on identifying and addressing strategic matters. Its aim is to document where effective co-operation is and is not happening throughout the plan-making process. It is a means of demonstrating at examination that the partial review is based on effective joint working across local authority and organisational boundaries and is deliverable over the plan period.
- 1.2 In considering this SoCG, it is important to recognise that Wyre council is undertaking a partial, as opposed to a full, review of its local plan. Necessarily, therefore, the strategic issues at hand are more limited in scope than would be the case if a full review were being undertaken. Bearing this in mind, in drafting this SoCG regard has been had in the advice in the PPG that such documents are expected to be concise and proportionate (paragraph: 011 reference ID: 61-011-20190315).

2. Preparation and Governance

- 2.1 This SoCG has been prepared by Wyre Council in support of the Wyre Local Plan (201-2031) Partial Review. This draft edition is published as part of the consultation on the Publication (Regulation 19) version of the Publication Draft Wyre Local Plan Partial Review (2011-2031).
- 2.2 The council's statement of consultation sets out in full the engagement that has taken place to inform the partial review. However, it is noted that in the light of the DtC, and given the strategic nature of matters relating to housing need and highways, the council has, in the preparation of its evidence base, held face-to-

face meetings with officers from adjoining authorities, National Highways and Lancashire County Council Highways Authority. Notes of the meetings setting out the agreed positions can be found in Appendix 2 of this document, with letters formally confirming the position with the relevant highway authorities set out in Appendix 3. In summary, the meetings identified no strategic matters of dispute in relation to those under consideration through the partial review.

- 2.3 In addition, this SoCG has undergone informal consultation and discussion with the relevant authorities in October 2021, with only minor clarification required as a result.
- 2.4 The SoCG has been developed under the Memorandum of Understanding described in Part 1 above. This draft Statement of Common Ground will be subject to discussion leading to agreement at the Officers' Group and if necessary the Advisory Steering Group and any changes to it will be subject to ratification by those groups as appropriate.

3. Strategic Matters

- 3.1 This Statement of Common Ground has been produced to support the Wyre Local Plan Partial Review (2011-2031). As described above, the partial review has a limited remit closely defined by Policy LPR1 of the Local Plan.
- 3.2 The strategic matters considered by this statement are limited to those that have direct impact upon the policies and text that are proposed for revision by the partial review. The strategic matters covered by this SoCG are:
 - Matter 1 The scope of the Wyre's partial review;
 - Matter 2 Wyre's housing need; and
 - Matter 3 Transport and highways.

Matter 1 - The Scope of Wyre's Partial Review

3.3 As explained above in Part 1 of this document, the scope of Wyre's partial review is specifically established by Policy LPR1, centred as it is on meeting the Objectively Assessed Need for housing, latterly termed Local Housing Need, and in that context review matters relating to highways and transport and undertake a consideration of allocations. There is no other Local Plan policy requirement to consider matters other than those identified in Policy LPR1.

- 3.4 In addition, and as set out in the council's scoping consultation February 2020, the council has considered the scope of the partial review in relation to compliance with the latest National Planning Policy Framework (2021).
- 3.5 The NPPF 2021 at §31 to 33 addresses the matters of preparing and reviewing plans. §33 states that policies should be reviewed to assess whether they need updating at least once every five years, with reviews being completed no later than five years from adoption. It goes on to state that relevant strategic policies will need updating at least once every five years if housing need has changed significantly with earlier review if expected to change significantly in the near future.
- 3.6 The Wyre Local Plan 2011-2031 was adopted in February 2019. It was supported by a full suite of evidence and was found at examination to be sound. The council is committed to a full review of the adopted Local Plan within the timescales set out in the NPPF.
- 3.7 It is common ground that the scope of the Wyre Local Plan Partial Review (2011-2031) is appropriate and satisfies the policy requirements of LPR1.

Matter 2 - Wyre's Housing Need

- 3.8 The Wyre Local Plan (2011-2031) paragraph 4.1.6 identifies the OAN for housing to be 479 net dwellings per annum, equating to 9,580 net dwellings over the plan period 2011-2031. This was derived from the Fylde Coast SHMA (2014) and Addenda, in particular Wyre Addendum 3: OAN Update (Turley, September 2017).
- 3.9 The Local Plan delivers 9,200 dwellings (Policy SP1) or 460 dwellings per annum within the plan period. Therefore, at the point of adoption there was an unmet need of 380 net dwellings or 4% of the OAN.
- 3.10 As required by LPR1, the Wyre council has considered the Objectively Assessed Need for housing. In accordance with §61 NPPF 2021 determining

the minimum number of homes needed requires a housing needs assessment undertaken in accordance with the standard method. The standard method has an inbuilt adjustment for past under delivery, as set out in the NPPG

The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately....

Paragraph: 011 Reference ID: 2a-011-20190220

3.11 Wyre council has undertaken the necessary calculation of housing need using the standard method. This gives a housing need figure of 296 dwellings p.a. (net). It is acknowledged that the government's intent is that the standard method is a starting point for determining the local plan housing requirement. The NPPG states:

The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.... Paragraph: 010 Reference ID: 2a-010-20201216

3.12 Examples of those circumstances which may lead a local planning authority to consider a housing need figure higher than the application of the standard method would indicate are listed in the policy and include unmet need in an adjoining authority. For the avoidance of doubt, Wyre has not been asked by any adjoining authority to consider accepting any unmet need.

- 3.13 The partial review has considered the matters contained in LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). This is below the 460 dwellings p.a. contained in the adopted WLP31.
- 3.14 As explained above, Wyre borough is a neighbour to a number of local authorities:

- Blackpool
- Fylde
- Lancaster
- Preston
- Ribble Valley
- 3.15 Through the preparation of the Wyre Local Plan Partial Review (2011-2031), the council has engaged with the above authorities and considered the respective positions on matters relating to housing need.
- 3.16 The adopted Blackpool Local Plan Part 1: Core Strategy (2012 2027) identifies a housing need figure for Blackpool of 280 net dwellings per annum. Blackpool Council is currently producing a Local Plan Part 2 in the form of a Site Allocations and Development Management Policies document.
- 3.17 Blackpool Council is not reviewing its housing requirement as part of the preparation of the Local Plan Part 2 document. Given the fact that the standard method has an in-built mechanism for addressing previous unmet need, given the fact that in any case Fylde Council has resolved to meet Wyre's unmet need arising from the adoption of the local plan, and given the fact that Wyre's partial review does not intend to revise the plan strategy and site allocations therefore providing sufficient supply to meet its needs with a significant buffer, there is no requirement for Wyre council to seek assistance from Blackpool Council to meet its housing needs. Equally, Wyre council has not been asked by Blackpool council to meet any of its housing needs.
- 3.18 At the time of writing, as explained above Fylde Council has resolved to address Wyre's unmet housing need arising from the adoption of the Wyre Local Plan through their own partial review of the Fylde Local Plan. This has been accepted by the examining Inspector (see above). However, the Wyre partial review is being undertaken independently of the Fylde partial review in accordance with Policy LPR1. The Wyre partial review is not dependent on Fylde's own review. Through the Fylde Partial Review Main Modification 2, the emerging plan identifies a minimum housing land supply of 7,275 new homes. This is considered by Fylde Council to be sufficient to meet the identified housing needs in Fylde, including Wyre's unmet need, over the plan period (to

2031). Fylde Council has not sought the assistance of Wyre council to meet its housing needs. As described above, the position of Fylde Council on the matter of housing need and requirement has been accepted by the examining Inspector subject to the relevant Main Modifications.

- 3.19 As explained above, Lancaster City Council is reviewing its two-part local plan in the light of the Council's declaration of a climate emergency. However, this review does not address matters of housing need.
- 3.20 Preston is one of the Central Lancashire Local Plan authorities. As explained above, the three authorities are working together to create a single Central Lancashire Local Plan. This work is an early stage. The degree of housing market connectivity between Wyre and Preston is relatively limited. It is envisaged that the housing needs of the three Central Lancashire Authorities will be met within their collective boundary. Wyre has not been asked by the Central Lancashire Authorities to consider meeting any housing need arising from within the boundary and it is not envisaged that this situation will change as the Central Lancashire Local Plan progresses.
- 3.21 Ribble Valley are at an early stage of the plan review process. Given the limited housing market connectivity between the two boroughs it is not envisaged that a situation will arise whereby assistance is sought from Wyre to meet housing needs in Ribble Valley. It is not envisaged that this situation will change as the Ribble Valley Local Plan review progresses.

Matter 3 – Transport and Highways

- 3.22 In the context of reviewing the housing need position, Policy LPR 1 part 2 specifically requires a review of transport and highway issues taking into account four factors:
 - (i) Housing commitments and updated housing needs;
 - (ii) Implemented and committed highway schemes;
 - (iii) The scope for sustainably located sites where the use of sustainable transport modes can be maximised; and
 - (iv) The additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs.

- 3.23 The council has met with adjoining authorities including Blackpool Council which is a Local Highway Authority in its own right, National Highways and Lancashire County Council Highways Authority on the matters identified in LPR1 part 2. It is common ground that:
 - Previously produced evidence and close co-operation between Wyre council and the relevant highway authorities was useful in highlighting key transport and highway issues, particularly along the A585 and A6.
 - Transport and highways is a key strategic matter that has implications across the borough's boundaries with adjacent authorities. This includes public transport enhancements along the A585 corridor.
 - The proposed adoption on the standard method calculation of housing need for Wyre leads to a position whereby the level of housing need is less than that in the adopted Wyre Local Plan. No new allocations are proposed. As such, there is no requirement for additional or new transport and highway evidence to support the partial review.
 - There are no newly emerging or recently produced transport and highways plans or strategies that will affect the Wyre partial review.
 - The forthcoming full Wyre Local Plan Review will afford the best opportunity to reassess the performance of the transport network within the borough. The timing of the full review will enable the Local Plan transport evidence base to take into account the impact of housing growth, the opening to traffic of the A585 Windy Harbour to Skippool Bypass (expected completion summer 2023), and for any trends in traffic patterns that could be established as a result of the COVID-19 pandemic to be considered.
 - Wyre council will work with the appropriate authorities, including National Highways, at the appropriate time to define the scope of the highways and transport evidence base necessary to support the full review of the Local Plan.

4. Matters Agreed

Matter 1 – Scope

4.1 It is common ground that the scope of the Wyre Local Plan Partial Review (2011-2031) as set out in this document is agreed.

Matter 2 - Wyre's housing need

- 4.2 It is common ground that:
 - a) The calculation of Wyre's housing need is satisfied by the adoption of the government's standard method and that this establishes a robust basis for the determination of the Wyre Local Plan Partial Review (2011-2031).
 - b) There are no other factors that require Wyre council to apply an uplift to the standard method calculation.

Matter 3 – Transport and Highways

4.3 It is common ground that the position as set out in paragraph 3.23 above is agreed.

Other Matters

- 4.4 In addition, it is common ground that:
 - There no further strategic matters relevant to the Wyre Local Plan Partial Review (2011-2031) not covered by this SoCG; and
 - There are no strategic matters of disagreement.

5. Signatories (to be confirmed prior to Submission)

5.1 The respective positions of Wyre council and the signatories in relation to the strategic matters as detailed in this document are hereby agreed:

On behalf of Wyre council:

Signed

Name

Position

Date

On behalf of Blackpool Council:

Signed

Name

Position

Date

On behalf of Fylde Council:

Signed

Name

Position

Date

On behalf of Lancashire County Council:

Signed

Name

Position

Date

On behalf of Lancaster City Council:

Signed

Name

Position

Date

On behalf of Preston City Council:

Signed

Name

Position

Date

On behalf of Ribble Valley Borough Council:

Signed

Name

Position

Date

On behalf of National Highways:

Signed

Name

Position

Date

Part 3 – Duty to Co-operate Statement of Compliance

1. Introduction

- 1.1 The Statement of Common Ground above describes active co-operation with Lancashire County Council as the upper tier (including the Highway Authority), National Highways and neighbouring local authorities in the matter of the Wyre Local Plan Partial Review (2011-2031). This includes quarterly officers meetings that provides a forum for discussing strategic matters of common interest. The Statement of Common Ground demonstrates close co-operation with neighbouring authorities and highway interests on matters relevant to Wyre's partial review. However, the Duty to Co-operate also requires the council to engage with certain other "prescribed" bodies. Of relevance to the Wyre Local Plan Partial Review (2011-2031), these additional bodies are:
 - the Environment Agency
 - the Historic Buildings and Monuments Commission for England (known as Historic England)
 - Natural England
 - the Civil Aviation Authority
 - the Homes and Communities Agency
 - Fylde and Wyre CCG
 - the National Health Service Commissioning Board
 - the Office of Rail Regulation
 - Lancashire County Council as the Highway Authority
 - the Marine Management Organisation
 - Lancashire Local Enterprise Partnership
 - Local Nature Partnerships
- 1.2 As detailed in Part 1 above, the Wyre Local Plan (2011-2031) is undergoing a partial review which has the express aim of addressing the strategic matter of Wyre's housing objectively assessed need as set out in Policy LPR1. There is no policy requirement to go beyond the specific requirements of LPR1.
- 1.3 The extent of direct co-operation with the prescribed bodies and other interested parties has been in proportion to this narrow focus. This co-operation has involved:
 - Consultation with organisations and individuals at the Scoping stage February 2020 (476 total consultees).

- Circulation of draft emerging evidence paper "Implementing LPR1" for informal comment September 2021 to specific prescribed bodies and other specific consultation bodies as defined by the 2012 Regulations.
- Circulation of an updated draft emerging evidence paper "Implementing LPR1" for informal comment to Wyre parish and town council's and neighbouring parish council's October 2021.
- Briefing for Wyre council ward members October 2021.
- Face-to-face briefing for Wyre parish and town council's November 2021.
- Involvement in the Sustainability Appraisal process (Natural England, Environment Agency and Historic England).
- Involvement in the Habitats Regulations Assessment (Natural England).
- Consultation on a draft revised Statement of Community Involvement (513 total consultees).
- 1.4 The council's broader approach to consultation and Engagement is set out in the Statement of Consultation.

2. Co-operation with the Prescribed Bodies

Partial Review Scoping

- 2.1 The council undertook a consultation on the scope of the Wyre Local Plan (201-2031) Partial Review (Regulation 18) over a six-week period from 28 February 2020 to 5.00 pm on 14 April 2020. Through this consultation, the council contacted 476 consultees, including professional organisations, parish and town councils, prescribed bodies and other organisations and private individuals.
- 2.2 In total, the council received 15 responses to the scoping consultation. This included responses from Blackpool Council, Fylde Council and the following prescribed bodies:
 - Highways England
 - Homes England
 - Marine Management Organisation
 - Natural England
- 2.3 The council's Statement of Consultation addresses the outcome of the consultation.

LPR 1 Evidence Base

- 2.4 As described above, the council held a series of meetings with neighbouring authorities and the highway authorities in September 2021 to share the emerging evidence base and identify and address any matters of concern. A draft copy of the emerging evidence document "Implementation of Policy LPR1" was circulated to participants in advance of the meetings. Appendix 2 includes a note of each meeting and matters agreed, whilst Appendix 3 sets out an exchange of letters between the council and highway authorities that provide formal confirmation of the respective positions. This series of meeting identified strong support for Wyre's approach to the partial review of the Local Plan 2031.
- 2.5 In September 2021, the council contacted specific prescribed bodies through a bespoke newsletter seeking views on the emerging evidence paper "Implementation of Policy LPR1". Appendix 4 contains a copy of the newsletter text. Responses were received from the Environment Agency, Historic England and Natural England. Natural England responded by agreeing with the approach the council is taking to the review of policies as described in the draft LPR 1 document. The Environment Agency and Historic England responded that they have no comments to make.
- 2.6 Wyre contains 21 parish and town councils. There are also a number of Parish Council's that neighbour Wyre borough. In October 2021 the council circulated a latest draft of the emerging evidence paper "Implementation of LPR1" to Wyre parish and town council's and neighbouring parish council's for informal comment. The council held a face-to-face briefing meeting with representatives from the Wyre parish and town council's on 8 November 2021 (see the Statement of Consultation for details). The meeting allowed officers to explain the background to the review, to explain the proposed approach and to answer questions about the partial review. Appendix 5 contains the relevant e-mail correspondence sent to Wyre parish and town councils and those adjoining parish councils.
Sustainability Appraisal Scoping Report

2.7 In accordance with the requirements of Regulation 12(5) of the SEA Regulations, the SA Scoping Report underwent the minimum five-week consultation with Natural England, the Environment Agency and Historic England during April-May 2021. The outcome of the consultation responses has been reflected within the final Scoping Report, which provides the SA Framework against which the Wyre Local Plan 2031 Partial Review can be assessed.

Habitats Regulations Assessment

- 2.8 A Habitats Regulations Assessment (HRA) is required under Article 6 of the Habitats Directive and Regulation 102 of the Habitats Regulations, where a land use plan may give rise to significant effects upon a Natura 2000 site (also known as a 'European site'). Natura 2000 is a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic. Nature 2000 sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). In addition, candidate Special Areas of Conservation (cSAC), Sites of Community Important (SCI), Ramsar sites and potential SPAs (pSPA) are also considered.
- 2.9 Consultation with Natural England was carried out throughout the development of the now adopted Wyre Local Plan, with each iteration of the HRA report taking Natural England's comments in to consideration and incorporating additional information as required. A Habitat Regulation Assessment Screening Report has been prepared for the Wyre Local Plan 2031 Partial Review and further consultation with Natural England will be carried out to seek their agreement with the conclusion of the HRA Report.

Statement of Community Involvement (SCI)

2.10 A four-week public consultation on the draft revised SCI was undertaken between 29 April and 28 May 2021 via a newsletter to individuals and organisations on the council's local plan consultation database (513 consultees were subscribed at the time). This includes the prescribed bodies. Eight consultation responses were received during the consultation period, including Highways England (now National Highways), Natural England and Homes England. The Statement of Consultation provides further details.

Regulation 19 Consultation (Publication Wyre Local Plan 2031 Partial Review)

To be added on completion of Regulation 19 "Publication" consultation.

3. Co-operation with other Bodies and Structures

Lancashire Development Plans Officer Group (DPOG)

- 3.1 The council has been engaged in long-term engagement with Lancashire councils through the Lancashire Development Plans Officer Group (DPOG). DPOG is a long established group, set up more than 20 years ago, as a forum for information sharing and discussion of all matters relating to development plans including plan making and the preparation of supporting planning policy.
- 3.2 The group meets quarterly. Its membership includes planning policy manager and officer representatives from all of the Lancashire authorities/districts, Lancashire County Council and the Lancashire Local Enterprise Partnership.

Blackpool, Fylde and Wyre Economic Prosperity Board (EPB)

3.3 The EPB is a joint committee of the Blackpool, Fylde and Wyre authorities. The nominated members of the committee are the three Councils' leaders. It is also attended by the three chief executives as well as a nominated private sector representative for each of the three authorities and other senior officers from the three authorities. The EPB meets quarterly. The remit of the EPB is to consider major economic and development issues where cross boundary interests are involved or matters involve interests that go beyond the sub-region. The EPB also performs the role of programme board for the Hillhouse (Wyre) and Blackpool Airport (Blackpool &Fylde) Enterprise Zones (EZ) superseding the role of the Blackpool Fylde and Wyre Economic Development Company which was wound up in March 2018. The requirement for a programme board was established in the EZ Memorandum of Understanding

that sets out the governance and cooperation principles behind the grant of EZ status, and which was signed on 9th November 2016 by the relevant authorities, the Ministry for Housing, Communities and Local Government (as was) and the Lancashire LEP.

4. Conclusion

4.1 Given the limited extent of the partial review, the level co-operation and engagement detailed in this Statement of Compliance is considered appropriate and proportionate. The council consider that it has met, and continues to meet, its obligations under the Duty to Co-operate.

Appendix 1 – Policy LPR1

LPR1 Wyre Local Plan Review

- The Local Planning Authority will bring forward a partial review of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. This will commence before the end of 2019 with submission of the review for examination by early 2022. Specific matters to be addressed by the review include the following:
- 1. An update of Objectively Assessed Housing Needs.
- 2. A review of transport and highway issues taking into account:
- (i) housing commitments and updated housing needs;
- (ii) implemented and committed highway schemes;
- (iii) the scope for sustainably located sites where the use of sustainable transport modes can be maximised; and
- (iv) the additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs.
- 3. Allocation of sites to meet the full Objectively Assessed Housing Needs taking into account 2. above.

Appendix 2 – LPR1 Meetings September 2021 – Agreed Notes of Meetings

Wyre Council and Lancashire County Council (Highways)

Date: 6 September 2021 (on Teams)

Attendees:

Len Harris (Senior Planning Officer, Wyre council) Fiona Riley (Senior Planning Officer, Wyre council) Glenn Robinson (Team Lead Development Control – Chorley, Fylde & Wyre, LCC Highways) Steve Smith (Planning Policy and Economic Development Manager) Neil Stevens (Highway Development Control Manager, LCC Highways) Callum Torrans (LCC Highways)

Agreed Notes and Actions

Wyre council called the meeting to discuss matters related to the current partial review of the local plan, with a specific focus on transport and highway matters.

SS opened the meeting by explaining the background to the partial review, including the requirements of policy LPR1 and the expected timeframe for the review. SS introduced a previously circulated draft evidence paper "Implementation of Policy LPR1" that sets out Wyre's approach.

A discussion took place on matters arising and it was agreed that:

- Previously produced evidence and close co-operation between Wyre council and the relevant highway authorities was useful in highlighting key transport and highway issues, particularly along the A585 and A6.
- The proposed adoption on the standard method calculation of housing need for Wyre leads to a position whereby the level of housing need is less than that in the adopted Wyre Local Plan. The standard method provides a minimum figure. No new allocations are proposed. As such, there is no requirement for additional or new transport and highway evidence to support the partial review.
- There is no newly emerging or recently produced transport and highways plans or strategies that will impact upon the Wyre partial review.
- Wyre council will amend the draft paper "Implementation of Policy LPR1" to reflect the need to review transport and highway matters as part of the full local plan review. This would also be reflected in the DtC Statement of Common Ground.
- Wyre council will work with LCC Highway Authority at the appropriate time to define the scope of the highways and transport evidence base necessary to support the full review of the Local Plan.

Wyre Council and National Highways

Date: 8 September 2021 (on Teams)

Attendees:

Len Harris (Senior Planning Officer, Wyre council) Warren Hilton (Assistant Spatial Planner, National Highways) Kristian Marsh (Route Manager, Lancashire, National Highways) Neville McKenzie (WSP consultant support to National Highways on spatial planning matters)

Fiona Riley (Senior Planning Officer, Wyre council)

Steve Smith (Planning Policy and Economic Development Manager, Wyre council) Andy Taylor (Route Manager Spatial Planning, National Highways)

Agreed Notes and Actions

Wyre council called the meeting to discuss matters related to the current partial review of the local plan, with a specific focus on transport and highway matters.

SS opened the meeting by explaining the background to the partial review, including the requirements of policy LPR1 and the expected timeframe for the review. SS introduced a previously circulated draft evidence paper "Implementation of Policy LPR1" that sets out Wyre's approach.

A discussion took place on matters arising and it was agreed that:

- Previously produced evidence and close co-operation between Wyre council and the relevant highway authorities was useful in highlighting key transport and highway issues, particularly along the A585 and A6.
- Transport and highways is a key strategic matter that has implications across the borough's boundaries including that with Fylde.
- The proposed adoption on the standard method calculation of housing need for Wyre leads to a position whereby the level of housing need is less than that in the adopted Wyre Local Plan. No new allocations are proposed. As such, there is no requirement for additional or new transport and highway evidence to support the partial review.
- Wyre council will amend the draft paper "Implementation of Policy LPR1" as presented to the meeting to reflect the need to review transport and highway matters as part of the full local plan review. It was agreed that this would be a matter identified in the Duty to Co-operate Statement of Common Ground.
- The forthcoming full Wyre Local Plan Review will afford the best opportunity to reassess the performance of the transport network within the borough. The timing of the full review would enable the Local Plan transport evidence base to account for the impact of traffic growth from the Local Plan growth to-date, the opening to traffic of the A585 Windy Harbour to Skippool Bypass (expected completion

summer 2023), and also for any trends in traffic patterns that could be established as a result of the COVID-19 pandemic.

• Wyre council will work with National Highways at the appropriate time to define the scope of the highways and transport evidence base necessary to support the full review of the Local Plan.

Wyre Council and the Fylde Coast Authorities plus Lancashire County Council

Date: 8 September 2021 (on Teams)

Attendees:

Helen Del Piano (Blackpool Council)
Julie Glaister (Planning Policy Manger, Fylde Council)
Eddie Graves (Principal Planning Officer, Fylde Council)
Len Harris (Senior Planning Officer, Wyre Council)
Fiona Riley (Senior Planning Officer, Wyre Council)
Jane Salah (Head of Planning Strategy, Blackpool Council)
Richard Sharples (Principal Planner, LCC)
Stephanie Shone (Planning Policy Officer, Fylde Council)
Steve Smith (Planning Policy and Economic Development Manager, Wyre council)
James Teasdale (Graduate Assistant Planner, Blackpool Council)
David Thow (Head of Planning Services, Wyre Council)

Agreed Notes and Actions

Wyre council called the meeting to discuss matters related to the current partial review of the local plan, with a specific focus on transport and highway matters.

SS opened the meeting by explaining the background to the partial review, including the requirements of policy LPR1 and the expected timeframe for the review. SS introduced a previously circulated draft evidence paper "Implementation of Policy LPR1" that sets out Wyre's approach. This includes a standard method derived housing need figure of 296 dwellings p.a. (net). SS explained that this is lower than the adopted Local Plan figure, the consequence of which include:

- The review of transport and highway matters required by Policy LPR1 is unnecessary; and
- The Local Plan strategy remains the same and as such the de-allocation of sites is unlikely to be necessary.

A discussion took place on matters arising and it was agreed that:

- The approach of the Wyre partial review to the derivation of housing need and requirement through the use of the standard method is consistent with that currently being taken by Fylde Council in their own partial review and is supported.
- Matters relating to the economy of the Fylde Coast, and specifically the performance of the Enterprise Zones, is a strategic matter that should be considered at the time of full plan reviews.

- Transport and highways is a key strategic matter that has implications across the borough's boundaries and will be considered as part of the proposed full Wyre Local Plan review. It was agreed that this would be a matter identified in the Duty to Co-operate Statement of Common Ground.
- There is a need to discuss and identify opportunities for joint working between the Fylde Coast Authorities on local plan evidence base to support full plan reviews.

It was also understood that on matters relating to transport and highways, Blackpool Council is a highway authority it its own right and will be consulted on the DtC SoCG in relation to this strategic matter.

In addition:

- RS agreed to circulate the draft evidence base to officers within LCC, specifically those dealing with the Education Authority and the Lead Local Flood Authority.
- JG agreed to forward minor amendments to the wording of the draft evidence paper.

Wyre Council and Lancaster City Council

Date: 9 September 2021 (on Teams)

Attendees:

Len Harris (Senior Planning Officer, Wyre Council) Paul Hatch (Principal Planning Officer, Planning Policy, Lancaster City Council) Diane Neville (Principal Planning Officer, Planning Policy, Lancaster City Council) Fiona Riley (Senior Planning Officer, Wyre Council) Steve Smith (Planning Policy and Economic Development Manager, Wyre council)

Agreed Notes and Actions

Wyre council called the meeting to discuss matters related to the current partial review of the local plan, with a specific focus on transport and highway matters.

SS opened the meeting by explaining the background to the partial review, including the requirements of policy LPR1 and the expected timeframe for the review. SS introduced a previously circulated draft evidence paper "Implementation of Policy LPR1" that sets out Wyre's approach.

A discussion took place on matters arising and it was agreed that:

- The approach of the Wyre partial review to the derivation of housing need and requirement through the use of the standard method is supported.
- The housing market in Lancaster is self-contained and there has been no request from the City Council for Wyre to meet its housing needs and no such request is planned.
- The Lancaster partial review is specifically focused on climate change matters and does not consider housing need/requirement matters to be within scope.
- LPR1 consider transport matters although the highway authorities have agreed that given no change in the development strategy and lower housing requirement, no new transport/highway evidence is required to support the partial review. However, it is recognised that transport and highways is a strategic matter that will be considered as part of the full review of the Wyre Local Plan and may lead to joint working on the evidence base with adjoining authorities.
- Wyre's full review will progress to Reg 18 stage likely to be in the first quarter of 2022. The two authorities will continue to co-operate on matters of mutual interest including the matter of climate change.

PH will review the evidence base document in terms of its description of Lancaster's housing position and provide suggested working as appropriate.

A discussion was also held on the Lancaster Partial Review which is focused on climate change. It was agreed that Wyre council will provide comment on the draft Lancaster DtC Statement of Common Ground.

Wyre Council and Ribble Valley Council

Date: 10 September 2021 (on Teams)

Attendees:

Len Harris (Senior Planning Officer, Wyre Council) Colin Hirst (Head of Regeneration and Housing, Ribble Valley) Fiona Riley (Senior Planning Officer, Wyre Council) Steve Smith (Planning Policy and Economic Development Manager, Wyre Council) Mark Waleczek (Planning Policy Assistant, Ribble Valley)

Agreed Notes and Actions

Wyre council called the meeting to discuss matters related to the current partial review of the local plan, with a specific focus on transport and highway matters.

SS opened the meeting by explaining the background to the partial review, including the requirements of policy LPR1 and the expected timeframe for the review. SS introduced a previously circulated draft evidence paper "Implementation of Policy LPR1" that sets out Wyre's approach.

A discussion took place on matters arising and it was agreed that:

- The approach of the Wyre partial review to the derivation of housing need and requirement through the use of the standard method is supported.
- There is no requirement for new highway evidence. Any full review of the Wyre Local Plan and will provide an opportunity to consider afresh any highway matters arising from development in adjoining authorities.
- Wyre council will ensure that the AONB Team are consulted on the partial review.

Wyre Council and Preston City Council (Central Lancashire)

Date: 14 September 2021 (on Teams)

Attendees:

Chris Blackburn (Planning Policy Team Leader, Preston) Len Harris (Senior Planning Officer, Wyre Council) Steve Smith (Planning Policy and Economic Development Manager, Wyre council) Carolyn Williams (Central Lancashire Local Plan Co-Ordinator)

Agreed Notes and Actions

Wyre council called the meeting to discuss matters related to the current partial review of the local plan, with a specific focus on transport and highway matters.

SS opened the meeting by explaining the background to the partial review, including the requirements of policy LPR1 and the expected timeframe for the review. SS introduced a previously circulated draft evidence paper "Implementation of Policy LPR1" that sets out Wyre's approach.

A discussion took place on matters arising and it was agreed that:

- The approach of the Wyre partial review to the derivation of housing need and requirement through the use of the standard method is supported. The position of Fylde council with regards to Wyre's unmet need was noted.
- There is no request for Wyre council to meet needs in Preston and the wider Central Lancashire area.
- There is no requirement for new highway evidence. The full review of the Wyre Local Plan and will provide an opportunity to consider afresh any highway matters arising from development in adjoining authorities.
- CW will check arrangements for signing the DtC Statement of Common Ground.

Appendix 3 – Highway Authorities Letters and Responses September/October 2021

Letters



Together we make a difference....

Warren Hilton Ask for: Steve Smith Assistant Spatial Planner Email: Steve.smith@wyre.gov.uk National Highways 01253 891000 Tel No: Store Street Our Ref: Manchester M1 2WD Date: 23/09/2021 Wyre Local Plan Partial Review

-

Dear Warren,

Thank you again for taking the time to engage with my officers and myself on duty to cooperate matters recently, this ongoing process has been invaluable and your input into the partial review process and Statements of Common Ground (SOCG) greatly appreciated.

I am writing only in relation to the partial review of the Wyre Local Plan to 2031 (WLP31) and seeking to confirm the position of National Highways.

In doing so, I am not seeking to replace or in any way limit any SOCG, rather I wish to set out a summary position which can be published in support of conclusions reached in a partial review document. A document which will soon be published under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.

The partial review has concluded an updated Local Housing Need figure of 296 dwelling per annum (dpa), or 7,232 dwellings over the plan period; 2011-2031. This figure is lower than the figure of 460 dpa (or 9,200) in the adopted Local Plan. Taking this lower figure into account, I am of the view that in accordance with Policy LPR1 (Wyre Local Plan Review) of the WLP31, there is no reason to introduce additional transport or highways evidence to support the partial review.

I would be grateful if you could confirm your agreement (or otherwise) with this approach and I can then include your response in a partial review evidence document.

As always should you wish to discuss this matter further then please do feel free to contact me in the usual ways.

Regards,

Steve Smith

Planning Policy and Economic Development Manager

Civic Centre, Breck Road, Poulton-le-Fylde, Lancashire FY6 7PU
Web: wyre.gov.uk | Email: mailroom@wyre.gov.uk | Tel/text: 01253 891000
Wwyrecouncil



Together we make a difference...

Neil J Stevens	Ask for:	Steve Smith
Highways Development Control Manager	Email:	Steve.smith@wyre.gov.uk
Highways and Transport	Tel No:	01253 891000
Lancashire County Council	Our Ref:	
County Hall		
Lancashire		
PR1 8XJ		
	Date:	23/09/2021

Wyre Local Plan Partial Review

Dear Neil,

Thank you again for taking the time to engage with my officers and myself on duty to cooperate matters recently, this ongoing process has been invaluable and your input into the partial review process and Statements of Common Ground (SOCG) greatly appreciated.

I am writing only in relation to the partial review of the Wyre Local Plan to 2031 (WLP31) and seeking to confirm the position of Lancashire County Council Highways.

In doing so, I am not seeking to replace or in any way limit any SOCG, rather I wish to set out a summary position which can be published in support of conclusions reached in a partial review document. A document which will soon be published under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.

The partial review has concluded an updated Local Housing Need figure of 296 dwelling per annum (dpa), or 7,232 dwellings over the plan period; 2011-2031. This figure is lower than the figure of 460 dpa (or 9,200) in the adopted Local Plan. Taking this lower figure into account, I am of the view that in accordance with Policy LPR1 (Wyre Local Plan Review) of the WLP31, there is no reason to introduce additional transport or highways evidence to support the partial review.

I would be grateful if you could confirm your agreement (or otherwise) with this approach and I can then include your response in a partial review evidence document.

As always should you wish to discuss this matter further then please do feel free to contact me in the usual ways.

Regards,

Steve Smith Planning Policy and Economic Development Manager

Civic Centre, Breck Road, Poulton-le-Fylde, Lancashire FY6 7PU
Web: wyre.gov.uk | Email: mailroom@wyre.gov.uk | Tel/text: 01253 891000
Wyrecouncil



Together we make a difference....

Jeremy Walker Transport Policy Manager Blackpool Council Talbot Road Blackpool FY1 3AH Ask for: Email: Tel No: Our Ref:

Date:

Steve Smith Steve.smith@wyre.gov.uk 01253 891000

23/09/2021

Wyre Local Plan Partial Review

Dear Jeremy,

Thank you again for taking the time to engage with my officers and myself on duty to cooperate matters recently, this ongoing process has been invaluable and your input into the partial review process and Statements of Common Ground (SOCG) greatly appreciated.

I am writing only in relation to the partial review of the Wyre Local Plan to 2031 (WLP31) and seeking to confirm the position of Blackpool Council Highways.

In doing so, I am not seeking to replace or in any way limit any SOCG, rather I wish to set out a summary position which can be published in support of conclusions reached in a partial review document. A document which will soon be published under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.

The partial review has concluded an updated Local Housing Need figure of 296 dwelling per annum (dpa), or 7,232 dwellings over the plan period; 2011-2031. This figure is lower than the figure of 460 dpa (or 9,200) in the adopted Local Plan. Taking this lower figure into account, I am of the view that in accordance with Policy LPR1 (Wyre Local Plan Review) of the WLP31, there is no reason to introduce additional transport or highways evidence to support the partial review.

I would be grateful if you could confirm your agreement (or otherwise) with this approach and I can then include your response in a partial review evidence document.

As always should you wish to discuss this matter further then please do feel free to contact me in the usual ways.

Regards,

Steve Smith Planning Policy and Economic Development Manager

Responses

1. National Highways Position September 2021

From: Hilton, Warren < Warren. Hilton@highwaysengland.co.uk>

Sent: 27 September 2021 10:34

To: Smith, Steve

Cc: Marsh, Kristian; McKenzie, Neville; Taylor, Andy; Harris, Len

Subject: RE: Wyre Local Plan Partial Review

Attachments: National Highways Letter 23-09-21.pdf

Dear Steve,

Thank you for your letter to me (attached) of 23rd September 2021 regarding the Wyre Local Plan Partial Review.

Given the fact that the Partial Review now sets out a reduction in the Objectively Assessed Needs (OAN) for the borough (and against the background of Wyre Council's intention to begin a full review of the Local Plan from 2022), I can confirm that National Highways agrees with the position expressed in your letter that accordance with Policy LPR1 (Wyre Local Plan Review) of the Wyre Local Plan 2011-31, there is no reason to introduce additional transport or highways evidence to support the partial review.

Notwithstanding the reduction in the housing OAN, we feel that an anticipated full Wyre Local Plan Review will afford the best opportunity to reassess the performance of the transport network within the borough. This is because the timing of the Review would enable the Local Plan transport evidence vase to account for the impact of traffic growth from the Local Plan growth to-date, the opening to traffic of the A585 Windy Harbour to Skippool Bypass (expected completion 2023) and also for any trends in traffic patterns that could be established as a result of the COVID-19 pandemic. We would therefore be happy to be involved in any discussions at that time to assist in defining what the scope of what that evidence base should be.

In the meantime, please do feel free to contact me if you would like to discuss anything about this email.

Kind regards,

Warren Hilton, Assistant Spatial Planner

Operations North West Spatial Planning Team

2. Blackpool Council (Highway Authority) Position September 2021

From: Jeremy Walker <jeremy.walker@blackpool.gov.uk>

Sent: 29 September 2021 12:37

To: Smith, Steve

Cc: Jane Saleh; Harris, Len; Latif Patel

Subject: RE: Wyre Local Plan Partial Review

Hello Steve

Thank you for your letter dated 23/09/21.

From a transport and highways perspective, Blackpool Council is in agreement with your stated position on Wyre Council's partial review.

As Wyre Council move to full review in 2022 we look forward to ongoing collaboration as the neighbouring Local Highway Authority.

Latif Patel from our Highways and Traffic department is copied in, as he should also be party to the dialogue on cross-boundary highways issues going forward.

Best regards,

Jeremy Walker

Transport Policy Manager

Blackpool Council

3. Lancashire County Council Highways Position September 2021

From: Neil Stevens <Neil.Stevens@lancashire.gov.uk>

- Sent: 15 November 2021 17:34
- To: Smith, Steve
- Cc: David Thow, John Davies, Stephen Young, Glenn Robinson

Steve

I can confirm I am satisfied with the minutes provided on the 13th October from our duty to cooperate meeting of the 6th September.

With regard to your letter dated 23rd September, I note that your partial review included updated Local Housing Need figure of 296 dwelling per annum (dpa), or 7,232 dwellings over the plan period (2011-2031) which is lower than the figure of 460 dpa (or 9,200) as included in the adopted Local Plan. With this reduction there is no requirements for any additional transport or highways evidence to support the partial review.

Kind regards Neil Neil J. Stevens Highway Development Control Manager Highways and Transport

Lancashire County Council

Appendix 4 – LPR 1 Evidence Paper Informal Consultation September 2021 (Newsletter)

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Planning Policy Newsletter

September 2021 Edition.

Dear Consultee,

Wyre council is currently undertaking a partial review of its adopted Local Plan 2011-2031 as required by Local Plan Policy LPR1. Last year we published a consultation on the scope of the review, which focused particularly on the borough's housing need and any associated transport and highway matters. The council has published a <u>summary of the responses</u> received to the scoping exercise.

It is intended to consult on the outcome of the partial review in the form of proposed changes to the adopted Local Plan in November this year. However, before this takes place, the council wish to ensure that key stakeholders have an opportunity to comment on the emerging evidence that underpins the review. This evidence is in the form of a paper entitled "<u>Implementation of LPR1</u>", a draft of which is attached to this newsletter. Please note that this document remains work in progress and as such it should be treated as confidential. This is an informal consultation with key stakeholders and not a formal part of the review process. You will have a formal opportunity to response to the council's proposed changes to the adopted Local Plan later this year.

To inform our work we would be happy to receive your comments on this draft paper, with a deadline of 12 noon Friday 1 October. Comments should be sent to <u>planning.policy@wyre.gov.uk</u>. This e-mail address can also be used if you have any queries about the attached draft document and the review process.

Please note that due to current working arrangements, officer availability to take calls is limited, email contact is therefore preferred at <u>planning.policy@wyre.gov.uk</u>

Kind Regards, Planning Policy and Economic Development Wyre Council 15 September 2021



Appendix 5 – Parish and Town Council Engagement November 2021

E-mail 27 October 2021 to Wyre parish and town councils:

Good afternoon,

You may recall that last year Wyre council undertook a public consultation on the scope of the emerging Local Plan Partial Review. The Partial Review is triggered by Policy LPR 1 of the adopted Wyre Local Plan 2011-2031 which requires the council to conduct an early partial review to address housing needs. To support the Partial Review the Planning Policy team has produced an evidence paper entitled "Implementation of LPR1 Background Paper". The paper – currently in confidential draft form – will provide the background to the Partial Review and details the changes the council propose to make to the Adopted Wyre Local Plan. This includes a consideration of housing needs using the Government's "Standard Method".

The Planning Policy team would like to invite a representative from your parish/town council to a briefing on the Partial Review **at 6.30pm on Monday 8 November at Wyre Civic Centre** (likely to be in the Council Chamber). This will provide you with the opportunity to ask questions about the Review and the direction it is proposed to take on housing need. It is suggested that where possible the attendee is your designated Planning Ambassador. It would be appreciated if you can confirm your representative prior to the meeting by responding to this e-mail.

The draft evidence paper is attached for your information (although we will pick up the main points on the day) and we are happy to receive <u>informal</u> written comments **up to Monday 15 November**. Please note the document remains confidential and is not in the public domain as it is a working draft subject to final editing. We are hoping to launch a public consultation on the proposed revisions to the Local Plan later in November which will allow your parish/town council to make a formal representation if you wish. Your informal comments – either in writing or made at the meeting - will not prejudice the formal views of your parish/town council.

Finally, please be advised that there are some COVID-19 guidelines that apply for meetings at the Civic Centre. These are:

- Please take a lateral flow test in the 24 hours before the meeting and only attend if this is negative.
- Please wear a mask when moving around the Civic Centre.
- Respect social distancing as far as you can.
- Use the hand sanitiser, which will be freely available in the Council Chamber.

Staff will also ask you to undergo a temperature check on arrival.

If you have any queries please contact the Planning Policy team on planning.policy@wyre.gov.uk

Regards,

Planning Policy Team

E-mail 27 October 2021 to adjacent parish councils:

Good afternoon

You may recall that last year Wyre council undertook a public consultation on the scope of the emerging Local Plan Partial Review. The Partial Review is triggered by Policy LPR 1 of the adopted Wyre Local Plan 2011-2031 which requires the council to conduct an early partial review to address housing needs. To support the Partial Review the Planning Policy team has produced an evidence paper entitled "Implementation of LPR1 Background Paper". The paper – currently in confidential draft form – will provide the background to the Partial Review and details the changes the council propose to make to the Adopted Wyre Local Plan. This includes a consideration of housing needs using the Government's "Standard Method".

Attached to this e-mail is a draft working version of the background paper for your information. We are hoping to launch a public consultation on the proposed revisions to the Local Plan later in November which will allow your parish to make a formal representation if you wish. However we would be happy to receive any informal comments you may have on the document. Please be advised that the document should remain confidential and is not in the public domain as it is a working draft subject to final editing. Any informal comment you wish to make at this stage will not prejudice the formal views of your parish/town council.

If you have any queries please contact the Planning Policy team on planning.policy@wyre.gov.uk

Regards,

Planning Policy Team