

WYRE LOCAL PLAN PARTIAL REVIEW EXAMINATION

Inspector: Mark Dakeyne BA (Hons) MRTPI

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To: Fiona Riley, Planning Policy Manager

Date: 8 June 2022

Dear Ms Riley

Wyre Local Plan Partial Review Examination

I write following my initial assessment of the Wyre Local Plan Partial Review (WLPPR) and associated documents, including representations made at publication stage. Your response to this letter will assist me in finalising the Matters, Issues and Questions (MIQs) for the examination.

Not all matters raised may necessarily go to soundness but may assist with the clarity of the WLPPR. Where a point could potentially be addressed by a Main Modification (MM) to the Local Plan (LP), I will make this clear by including **MM** in the text.

As the examination develops, a Schedule of MMs should be produced. The Schedule should be in place in draft form in advance of the hearings, preferably published at the same time as any statements when it will become an examination document and inform discussion at the hearings. It will be refined during and after the hearings and then subject to consultation.

I may have further questions during the preparation period which are not covered in this note. Moreover, my questions and comments are without prejudice to my consideration of the soundness of the Plan's policies during the remainder of the Examination, including at the hearings.

The terminology of the Plan

The terminology within the National Planning Policy Framework (the Framework) and Planning Practice Guidance (PPG) refers to the need to review policies in local plans to assess whether they need updating. Therefore, there is a distinction between review and update. In addition, in view of the focused nature of the 'update' to the adopted Wyre Local Plan (WLP), the title of the consolidated Plan should be the *Wyre Local Plan 2011-2031 (incorporating partial update of 2022)*. This **MM** would be required so that the Plan is effective and consistent with national policy.

Duty to Cooperate

I note that the Schedule of Additional (Minor) Modifications [SDPR02] proposes the removal of Section 1.4 of the WLP and its replacement with a single sentence about the Duty to Cooperate. Whilst the scope of the WLPPR is limited, some additional commentary should be included within it to describe how the Duty to Cooperate has been met. Such wording should be developed during the examination and reflect any relevant discussions, particularly relating to how the Fylde Local Plan interacts with the WLPPR in addressing Wyre's unmet needs. These changes would comprise a **MM** and would be necessary so that the Plan is positively prepared.

Housing Supply

I note that paragraphs 4.1.18 and 7.2.2 (Table) of the Plan refer to an assessed supply of 9,423 dwellings, whereas Appendix E (Footnote 51) refers to a total supply of 8,715 dwellings expected to be delivered by 2031. The figures may be different for good reason but this should be clarified in due course, taking into account the updated position on housing land supply as of 31 March 2022 to be provided during the examination. The updated housing land supply position will comprise an **MM** and will be necessary for the effectiveness of the Plan.

The requirement to set out a housing implementation strategy¹ is no longer contained within the Framework or PPG. However, it is acknowledged that the Council still needs to maintain delivery of a five-year supply of housing through the Plan period and that housing supply needs to be monitored in accordance with paragraph 76 of the Framework. Taking into account the above, consideration should be given to the wording of paragraphs 7.2.4 and 7.2.6 and Chapter 10 to reflect current national policy.

Use Classes Order (UCO)

The submission document includes a section in the introductory chapter (Section 1.5) drawing attention to the changes to the UCO introduced in 2020 but does not propose any modifications to policy. The Council indicates that this will be a matter for the full review of the LP.

However, Government policy in relation to ensuring the vitality of town centres and promoting sustainable economic development have not significantly changed (Section 7 and the Glossary to the Framework), notwithstanding the changes to the UCO.

Has the Council given consideration to the implications of the inclusion of employment and other uses within Class E for the effectiveness of the Plan and whether any significant impacts should be addressed by modifications to the affected

¹ Referred to in paragraph 47 of the 2012 Framework

policies (notably Policies EP1, EP2, EP3, EP6, SA2, SA3, SA4, SA5, and SA7)? In particular:

- *Should policies which include reference to use classes that no longer exist (Classes A, B1 and D) be modified so that they are up to date? For example, should references to Use Class B1 be changed to 'light industrial, offices and research and development uses'?*
- *Should there be a reference in policy e.g. Policy EMP1, to proposals for Class E uses in locations outside a defined centre being subject to a condition to prohibit town centre uses (as defined in the glossary of the Framework)?*

Additional Modifications

Other than the point raised above in relation to the Duty to Cooperate, I consider that the changes proposed in the draft Schedule of Additional (Minor) Modifications [SDPR02] do not go to 'soundness' and therefore would comprise Additional Modifications (AMs). The correction to the Footnote reference in paragraph 7.5.2 (Footnote 40, not Footnote 49) is an AM.

Timetable

As previously indicated, I intend to finalise the MIQs for publication by 24 June 2022. Therefore, a response to this letter by 20 June is required. In the meantime if you require any clarification regarding the above or any other matter please contact me via Tony Blackburn, the Programme Officer.

Yours sincerely

Mark Dakeyne

INSPECTOR

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