

**AREA ACTION PLAN PUBLIC EXAMINATION MARCH 2009
RESPONSE OF TAG TO QUESTIONS RAISED BY THE INSPECTOR**

Appendix A

Response of Thornton Action Group to the Submission Document of the Area Action Plan (AAP) for the Inspector.

20th April 2008

1 Introduction

1.1 The Thornton Action Group was formed in 2001 by local residents with the objective of making Thornton a better place to live in.

1.2 It has been involved not only in responding to planning applications but also in improving open spaces and other community activities. Issues concerning Thornton are discussed at its meetings (held every 5-6 weeks) and detailed and constructive comments have been made concerning the policy documents produced by local government and other bodies.

1.3 As a local community group it is represented on the Stronger Communities Group of the Local Strategic Partnership.

1.4 We welcome the opportunity to express our views to the Inspector on the Submission Document of the AAP. The Submission Document was discussed at our March meeting - attended by 25 people - and a sub-committee set up to produce a response to the Tests of Soundness. This response was circulated to all members (more than 50) for them to comment before final completion.

1.5 The Action Group was fully involved in the public meetings and in responding to both the Issues and Options Report (October 2006) and the Preferred Options Document (June 2007).

1.6 Concerns which were raised in the Issues and Options Report were addressed in the Preferred Options Document largely to the satisfaction of the residents. Hence TAG did not respond to this document but encouraged its members to do so.

1.7 However, we feel that these concerns which we raised earlier and believed were being addressed, have been ignored subsequently :-

a by the decisions made by WBC for 558 dwellings on the Power Station Site (PS1) in November 2007, which was deferred to the Head of Planning, and previously the approval of 380 dwellings on the Fleetwood Docks Site (FD1) in December 2006.

b in this Submission Document where a number of significant changes have been introduced since the consultation on the Preferred Option.

2 Tests of Soundness

2.1 Our representations concern essentially two tests of soundness.

2.2 Test 8 insists that there are “clear mechanisms for implementation and monitoring”. We consider this test under the following headings -

3. Improvements to the A 585
4. Funding for junction improvements on the A 585
5. Affordable Housing
6. Recreation and Leisure

2.3 Test 2 asks “has the AAP been prepared to comply with the SCI?”

The significant changes introduced as a result of the inclusion of the Growth Point Bid have not gone through the statutory consultation process. The implications of the Growth Point Bid are set out in Section 7.

3 Improvements to the A 585 (T)

3.1 “The aim of this AAP is to provide a comprehensive vision and spatial planning frameworkin order to.....support planning decisions (1.18). (References are to the Submission Document unless otherwise specified). It is our contention that planning decisions have been made with in some cases little regard to the AAP.

3.2 The AAP clearly shows (6.30) according to the Lambert Smith Hampton Study (2005), that the potential for employment is restricted by the traffic capacity of the A 585(T).

3.3 6.35 states “significant expansion will only be possible if and when measures to provide additional traffic capacity are in place”.

3.4 This is recognised in the Preferred Options Document (6.12 POD) “for any large scale development (Option 3) to take place within the Area that substantial investment be made to improve the Strategic Highway Network.”

3.5 Returning to the Submission Document, Figure 6.1 indicates that demand management alone would be insufficient and “consequently it will be the case that the first development which comes forward is likely to trigger the need for a number of junction improvements (6.59).”

3.6 These are shown to be Skippool, Bourne Way, Norcross Road, Singleton and Shard Road and possibly Fleetwood Road and are triggered by any development in Phase 2 ie the Power Station 1 housing.

3.7 The Transport Study (App B) unequivocally states “given that the A 585 would be congested in the absence of development proposals in the SLD site and any development that comes on board would trigger the need of improvement at these junctions” (A25).

3.8 Whilst the AAP recognises the above, WBC has already given permission for development within the AAP - namely 380 dwellings at Fleetwood Docks (FD1) in December 2006 and 558 dwellings at the Power Station Site (PS1) in November 2007, the Waste Processing Plant and the Thornton Business Park, without securing any improvements to the A 585.

3.9 It should be noted that 558 dwellings were approved at PS1 compared with the 400 planned in the AAP.

3.10 Lancs CC in its response to the Preferred Option draws attention to the fact that the implications of the Waste Processing Plant traffic are not addressed (App K, p155).

3.11 In a letter to Garry Payne of 15th November 2007 (App K, p 187), the Highways Agency states “we have not yet been provided with the technical data that would need to be considered and agreed before the Agency could provide a fully considered response to the AAP, its impact, type and extent of amelioration and the mechanisms for delivery”. We do not believe that the matters raised by the HA have been adequately addressed (if at all) in the Submission Document. It is our contention that a cumulative traffic impact assessment is required to assess the full impact of the various proposals for development in the Area on the A 585. As we understand it, this is something that WBC should have carried out.

3.12 The fact that permission has been given for these developments without the necessary improvements to the junctions on the A 585, clearly shows that the implementation policy has failed.

4 Funding for junction improvements on the A 585(T)

4.1 The Implementation Policy (Section 7) - Transport Network Improvements - states that junction improvements will be paid for by mainly Private Sector funding. “The Council will seek commuted sum payments towards a series of improvementsmore specifically the A 585(T)”.

4.2 According to Table 7.1 these are supposed to start in 2008.

4.3 Specifically regarding funding the AAP states that “without these financial contributions it is unlikely that new development could be approved” (7.8).

4.4 Not only has WBC given permission for the developments within the AAP given above (see 2.8) but it has obtained no money from the developers under the Section 106 agreement for improvements to the junctions on the A 585.

4.5 Thus permission has been given for 73% of the housing envisaged in the AAP (938 out of 1300) which severely reduces the opportunities of obtaining the required sums under Section 106 agreements.

4.6 Concern is expressed in the AAP about these commuted sum payments. “A mechanism of distributing the costs across the whole of the development potential within the Plan Area will need to be established” (6.59).

4.7 “There will be a requirement to ‘front load’ the improvement costs” (6.62). Neither of these has been done.

4.8 The Transport Study (App B) is aware “there is a risk that insufficient funds will be available to provide the necessary improvements and alternative sources of funding need to be identified to meet the funding gap”. There is no mention in the Submission Document of what these alternative sources might be and what sums will be needed.

4.9 The responses from GONW and LCC (App K p153) to the Preferred Option highlight the inadequacy of the AAP proposals.

4.10 GONW (p147) requires the AAP to “make clear what works will be necessary to produce adequate improvements to the A 585 and that there will be adequate measures in place to fund the works”. This is one of the tests of soundness (ix) and clearly this has not been done.

4.11 The letter from GONW of the 14th November 2007 (p212) expresses concern. “It is still not clear you have an implementation plan showing when the works will be programmed and how they will be paid for”. “We recommend that you expand on the likely alternative sources of funding”.

4.12 Thus despite all that is said in the AAP about funding the A 585 junction improvements, the implementation plan is still lacking.

5 Affordable Housing

5.1 Policy 2 Housing Provision and Choice, states that the Council will expect proposals for new housing development within the Area, which comprises 15 or more dwellings, to make on site provision of affordable housing at a rate of at least 40% of the total number of dwellings.

5.2 However, the permission for FD1 (380 dwellings) was granted without the provision of any affordable housing. Instead £1 million was provided by the developer to WBC. This sum would do very little to provide sufficient numbers of this type of house whether new build or existing property.

5.3 In the case of PS1 (558 dwellings) it is proposed that 100 units are affordable ie 17%.

5.4 Clearly the policy which is given in the AAP has not been followed with regard to the housing developments approved to date.

5.5 GONW is concerned about the lack of provision of affordable homes. They have demanded a further breakdown of affordable housing requirements and how they are to be achieved. “The Submission Document should contain more information on types, size and densities of housing allocations. Size and type of affordable housing is required” (App K p 149).

5.7 The LCC also remarks that “further clarity is needed in the likely scale and type of affordable housing” (App K p155).

5.8 There are no clear mechanisms in the Submission Document for the implementation and monitoring of the numbers of affordable houses indicated in Policy 2.

6 Recreation and Leisure

6.1 Policy 8 states that “new development should provide open spaces or contributions will be sought from developers towards the provision or upgrading of formal and informal facilities within the Area”.

6.2 As stated in 3.5 above, 73% of the housing has already been approved without gaining any contributions from developers, specifically for recreation or leisure purposes. Thus the funding sources and implementation framework for the policy remain vague.

6.3 The LCC (App K, p153) state “There should be more emphasis and strategic guidance provided regarding the Area’s green infrastructure” and in a similar vein (p 158) “The opportunity for ‘green tourism’ has not been adequately addressed within the AAP”. We concur with these views given the enormous possibilities for enhancing the Wyre Estuary.

6.4 TAG is particularly concerned about the green fields at Poolfoot Farm. The application by NPL to build 510 dwellings on these fields was approved by WBC but at the Public Inquiry (APP/U2370V/02/1086527 Sept 2002) objections by Persimmon Homes and TAG were upheld. One of the reasons given by the Inspector for refusal was that development would be harmful to the landscape. “Poolfoot Farm is currently an attractive area of green pasture, interspersed by old hedgerows that has survived remarkably undisturbed. It offers a natural haven for wild life and is understandably prized by local residents... I regard the site as a rare commodity whose future is worthy of careful consideration within the context of a comprehensive plan”. Since that time permission has been given for 19 houses on the site of the farm buildings and yard.

6.5 The fields are shown on the AAP Proposals Map (App A) as green space, but there is no mention of their status within the text. This land is still owned by NPL and we are fearful that it would attempt to build in the future on this land unless it is specifically protected,

6.6 This is made all the more urgent by the proposal in the Submission Document (not contained in the Preferred Option Document) to move the Football Club which would include the pitches on the northern fields of Poolfoot, outside of the AAP.

6.7 There are no clear mechanisms in the Submission Document for the implementation and monitoring of Policy 8.

7 Growth Point Bid

7.1 There is a significant new element introduced into the AAP since the Preferred Option Document was agreed.

7.2 The Growth Point Bid was put to WBC Cabinet on the 28th January 2008 and is referred to in the Submission Document.

7.3 The Bid would involve housing growth above the existing regional planning guidance levels with at least 500 homes per year focussed on urban areas (for Wyre these are Fleetwood and Thornton-Cleveleys). The number of years is not stated.

7.4 The Bid is “likely to have an impact on the amount of land required for housing provision in Wyre”(6.37). “The Council is confident that any additional allocation above the current RSS allocation of 3700 dwellings could be incorporated within the Area by increasing the land available for housing on land currently identified for employment use” (6.38).

7.5 Besides the fact that the Council does not know how many additional dwellings would need to be incorporated under the Growth Point Bid and how much employment land would be needed for housing, there is a fundamental issue here concerning the balance of housing, employment, commuting and transport infrastructure.

7.6 A considerable number of responses from the residents concerned the provision of jobs in the Area before housing development.

7.7 There has already been the transfer of land within the Area allocated from employment to housing (see Site 1753 for 207 dwellings on Hillylaid Road (App M - housing windfall)).

7.8 The Employment Land Review indicates that land for employment use is only being taken up at a very slow rate (6.39).

7.9 Policy 3 (Section 7) indicates sites for possible expansion of employment at Fleetwood Docks (FD2), Hillhouse and Red Marsh. Expansion at Hillhouse Secure Site has been slow since its purchase by NPL from ICI . ICI employed 6000 people compared with the 1000 at present at Hillhouse.

7.10 It is uncertain to what extent the modernisation of Red Marsh Industrial Estate would result in increased employment, since the estate has no room for further expansion.

7.11 Consequently no attempt has been made in the Submission Document to show the likely increase in commuting to work outside the Fleetwood-Thornton area. The building of additional houses in the AAP, particularly non affordable housing, without the necessary development in employment will result in more commuting and more traffic on an already congested A 585 which at peak times is at a standstill.

7.12 This is illustrated by a survey carried out by TAG in 2002 of the 200 new houses occupied in Hillylaid and Stanah Roads (50% response rate), which was presented in evidence at the Poolfoot Inquiry, showed that 38% of residents had moved into these houses from beyond the Fylde and that 75% travelled to work outside Thornton-Cleveleys and Fleetwood.

7.13 Although at this stage Wyre BC have agreed just to explore the possibility of being involved in a Growth Point Bid, it is discussed in the Submission Document. The scale of possible development means that it is not a question of the AAP being “reasonably flexible” but adds a significant new dimension to the proposal. This fails the test of complying with the SCI because the due process of consultation has not been followed.

8 Conclusion

8.1 The AAP preferred option promised to address these issues. However, the decisions taken in the meantime by WBC relating to development in the Area without addressing the need for transport improvements on the A 585 junctions or assessing the way the funding is to be found for these, seriously undermines the consultation process with the community and the faith that the community puts in the planning process.

8.2 This is demonstrated by the motion passed at the most recent Thornton Local Area Forum (21st February 2008) with an overwhelming majority that “the Forum has no confidence in the consultation process regarding the Area Action Plan”.

8.3 The introduction of the Growth Point Bid at this very late stage, without consultation, only reinforces this lack of confidence.

8.4 All the documentation and consultation which has gone in to producing the Submission Document will be shown to be irrelevant should the Growth Point Bid be applied for and approved.

8.5 For all these reasons, Thornton Action Group avers that the Submission Document is neither sound nor reasonable (1.1).