

AREA ACTION PLAN PUBLIC EXAMINATION MARCH 2009
Response of TAG to the questions raised by the Inspector for discussion

Appendix B

Response of Thornton Action Group (TAG) to the Addendum to the Submission Document (SD)

1 About this document

- 1.1 The Addendum sets out all the relevant proposed changes to the original SD. This original document is still a valid part of the Submission where sections and/or wording have not been replaced as shown in the Addendum.
- 1.2 This response from TAG is a response to the Addendum. Thus the response from TAG to the SD is still valid and both responses should be taken together.

Do the proposed changes meet your previous concerns?

Response – No

2 Improvements to the A585

- 2.1 The residents of Thornton chose Option 3 as the Preferred Option – maximum development because they were assured that “for any large scale development to take place within the Area, that substantial investment be made to improve the Strategic Highway Network” (Preferred Option Document POD 6.12).
- 2.2 This assurance was based on the joint Report of Atkins and Wyre BC which was presented at public meetings in Thornton and Fleetwood. It is proposed in the Addendum to delete all reference to the Atkins/Wyre BC Report and its conclusions (Change 26).
- 2.3 Astonishingly there is no reference to the HA’s Route Management Plan (RMP) for the A585, which details the improvements necessary at the junctions to alleviate existing traffic congestion (using 2001 data for the most part). A clear vision was set out in the RMP which has now been fudged and moved back.
- 2.4 TAG cannot believe that LCC and HA have no critical highway capacity concerns on the LHN or SRN network beyond that which has been considered as part of this strategy (STS 1.9). If so, why was a Route Management Survey (RMS) carried out and a RMP produced?
- 2.5 It is vital that the proposals for junction improvements, funding and timetable as set out in the RMP which is designed to alleviate existing congestion, are co-ordinated with these new proposals which seek to address the impact of just a part (not all) of the development within in the AAP Area. A cumulative traffic assessment for the whole of the development within the AAP Area is urgently required so that proper planning can take place.
- 2.6 Instead of the Atkins/WBC Report, a new traffic assessment has been made (Part F). The figures are shown in Table 4.2.
 - A The flows shown are for am and pm. There is no explanation as to whether these are for the whole of the am/pm period or peak flows.

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- B They purport to show total traffic at the junctions. This does not say anything about congestion on the A585 or feeder roads. It would have been much more useful to have shown queuing times which are necessary to quantify the degree of congestion.
 - C Figures are growthed to 2008. But from what base and using what formula?
 - D Where are the references to previous studies on traffic flows on the A 585 as measured by LCC and HA for comparison?
- 2.7 Based on these unclear figures, the Sustainable Transport Strategy (STS) sets out the traffic flows which the developments on the AAP will trigger. The STS claims that it has considered “the overall impact from the AAP developments – to accommodate vehicular trip generations from ALL” (my capitals) “set out in the AAP (2.1). Yet this is not the case because substantial developments within the AAP Area have not been taken into account – e.g. 380 dwellings on Fleetwood Docks FD1, 558 dwellings on Power Station PS1, Waste Technology Plant, Business Park, and the Energy from Waste Plant.
- 2.8 The Addendum deviates considerably from previous documents (POD and SD) in that the connection between the development within the AAP Area and the improvement to the key junctions is effectively removed. (Change 41). The principle of the first development to trigger improvements to the junctions on the A 585 is conveniently forgotten.
- 2.9 This is replaced (Change 48) by the need to assess traffic and transport impacts as they come forward. This is back to the piecemeal planning process which the AAP was designed to overcome. The principle of a Comprehensive Area Plan as sold to the public has been discarded.
- 2.10 Moreover, we are ‘promised’ highway improvements in three stages as each development is granted assent and implemented (Change 46). Improvements to junctions will only happen when sustainable measures have not been successful in reducing traffic generation. Then ‘Reasonable Highway Improvements (not even Robust) will be implemented (Change 47). The statement in 4.17 that “we will seek to provide improvements” does not inspire confidence, especially when a Steering Group (membership unclear) will decide on priorities (Change 57).
- 2.11 There are serious issues to be raised concerning the timetable for junction improvements. These are not scheduled to begin (even if prioritised) until 2013, yet housing on PS1 is planned to commence in 2011 and the District centre in 2010 at which date the Waste Technology Plant will be in operation. This totally negates what was agreed in the Preferred Options Document.
- 2.12 Many of the junction improvements shown in Appendix D (STS) which show three lines of traffic approaching and around roundabouts in our opinion present a significant hazard to pedestrians and cyclists without signalling and green man crossings. Change 58 states that the needs of pedestrians and cyclists should be prioritised. We would like to see a rethinking of how these junctions can be made safer.

3 Funding for junction improvements

- 3.1 The major concern is that funding will only come from a limited number of developments as yet to be submitted and approved and that the opportunity for contributions from a major part of the development in the Area has been missed i.e. housing on FD1 and PS1 (72% of all housing), the

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Waste Technology Plant and Business Park. It is unclear what the £300,000 for off site works specified for PS1 will be used for and what contributions were agreed regarding the Business Park. If some of the other developments fail to materialise then the funding from the Area as a whole for junction improvements will fall short of that which is necessary.

- 3.2 A sum of £10 million will be paid by developers for sustainable improvements. Yet no list of sustainable solutions is provided together with what they would cost and the degree of improvement that they would bring (Change 44). This must form part of the SD otherwise contributions could easily be wasted on schemes that fail to measure up to expectations.

- 3.3 Sustainability contributions are based on trip generations from cars. Yet much of the traffic will come from HGV's – Waste Technology Plant, Power Station, expansion of Hillhouse. How is it proposed to reduce this traffic? It should be pointed out that reducing congestion could well be the most sustainable measure which could be taken because it will reduce the amount of exhaust gases emitted.

- 3.4 There is confusion in how much funding will come from public sources and how much from developers and for what improvements. 7.3.3 states "there are some key projects where public sector funding will either be the main means of implementation or will supplement action by the private sector." Yet 7.51 states "funding for necessary infrastructure improvements ...will be through developer contributions."

- 3.5 We are not sure of what has happened to the £11 (?) million of public money identified in the RMP for junction improvements on the A 585. Do the contributions from developers take its place? Could not more effective junction improvements be made using the public funding to alleviate existing congestion plus developer contributions to take care of the increased traffic caused by their developments?

- 3.6 How much of the £1.2 million agreed with NPL as a contribution from PS1 will be for Strategic Highway Improvements on the A 585 (see footnote Table 7.1)?

- 3.7 £10 million is earmarked for junction improvements but only after sustainable measures have been tried and found wanting (Key Development Indicator (KDI)– A). This is at variance with the POD (6.12) and the SD (6.1).

- 3.8 The level of contribution that each developer will pay is to be based on an accessibility score for each proposed development. Thus there is no guarantee that the amount indicated which is a maximum, will be forthcoming.

- 3.9 There is particular concern about the example given where distance to a train station is measured (Appendix C). The claim that it takes 8 minutes to reach a station (Poulton?) from PS2 and 7 minutes from FD2 which is further away, is questionable.

4 Affordable Housing

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- 4.1 The Addendum states that WBC expects that affordable housing will make up at least 40% of the total number of dwellings (Change 21). Yet it then goes on to justify a reduction from the 40% in exceptional circumstances. The KPI (Key Performance Indicator) 15 also indicates that there should be up to 40% affordable housing. Elsewhere (7.2.3) it states that the 40% should be aspirational.
- 4.2 Yet the number of affordable dwellings on FD1 (£1.2 million) and PS1 (10%) are so minimal as to make the aspirational figure look quite ridiculous (Table 7.1). The principle of local housing need is being discarded.
- 4.3 We question the assumption that 40% affordable housing has a negative effect on viability of a housing development. The viability surely depends on, among other factors, the cost of the land, the cost of remediation and the state of the market. No details of this Viability Assessment are provided. The flexible approach to affordable housing adopted in the Addendum can only be interpreted as a get out clause (7.8.2).
- 4.4 Regarding flexibility in meeting housing targets, stating that “land at the northern end of the Hillhouse site” is available is far too imprecise. How much land is available? Is this land identified for employment use? In which case the question of providing more houses without employment creation and the effect on commuting needs to be addressed? In producing a Comprehensive Development Plan then the implications of any such future development, particularly for traffic, has to be considered.
- 4.5 A monitoring system for identifying affordable housing needs seems pointless because the results are already known. These developments will do little to solve the need for 500 affordable houses in Wyre. The question must be asked “what appropriate remedial action will be taken? (8.8.1)”.

5 Recreation and Leisure

- 5.1 TAG is delighted to see that WBC have recognised the importance of keeping Poolfoot Farm as open space. There is still concern about the protection – we would want to see some formal protection to safeguard this valued site from future development - and management of this space and the loss of some of it for the pavilion and car parking should the football club move to this site.
- 5.2 There is confusion as to whether the football club is to relocate or not (Change 68 and 69).
- 5.3 KPI 13 envisages a “net increase in formal and informal open space”. This net increase could be very small. What amount of increase is needed to satisfy KPI 13?
- 5.4 Change 2 notes that commuted sum payments will be sought from developers towards ecological mitigation. Again this is very imprecise. Green areas need to be identified and the cost of any ecological mitigation quantified and apportioned.

6 Growth Point Bid

- 6.1 We welcome the statement that “Wyre is not part of the Growth Point Bid” which introduced a significant new element into the SD. There should be a definite statement that land identified for

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employment should not be made available for housing (SD 6.8). The need is to attract employment into the area in order to reduce commuting. This is what the residents have insisted on from the initial discussion on the AAP.

7 Change from Local to District Centre

- 7.1 This is a new element introduced at a very late stage (the Addendum) where the residents have not had the opportunity to give their views.
- 7.2 The District Centre proposes a superstore of 5,500m² – ten times the size of the store which would have formed part of the Local centre. This is far too large a food store to serve the 800 houses on the power station sites. What happened to the interim advice from the Council’s own consultant to restrict convenience floor space to 500m²? Why does the WYG assessment refer to a food store of 4,181m²?
- 7.3 There is no information given in the Addendum about the need for this size of store, its affect on local shops and shopping centres at Marsh Mill and Thornton Centre, nor the existing superstores (Asda and Morrisons). Surely some study needs to be made of this before the proposal can be included in the AAP. If this information is contained in the Fylde Coast Retail Study then it needs to be presented as part of the Addendum so that people can reach conclusions based on all the facts available.
- 7.4 LA’s are encouraged to protect existing facilities which provide day to day needs (Part J). The Addendum refers to “deficiencies in local shopping and other facilities”. But these deficiencies are not quantified or even identified (SA Objective 3).
- 7.5 Many of the advantages claimed for the District Centre are without substance. How does a district centre improve educational achievement (SAO 5)? The DC is not on previously developed land as claimed in SAO 16. Where is the known protected species habitat (SAO 11)? How will the DC improve the competitiveness of local businesses (SAO 20)? In SAO 21 what is the connection between the Comments/Explanation and the Objective?
- 7.6 The new medical centre is to be co-located with the new Health Centre within the Fleetwood boundary and not in Thornton. The pluses shown in Table 7.2 are therefore misleading.

Question 2

Do the changes make the document sound?

Response - No

The changes do not address the fundamental concerns raised by TAG in response to the SD with the exception of the Poolfoot Farm Open Space and the Growth Point Bid. Moreover, a new element is introduced which has not been properly researched or if it has been, then the findings of its effect on other shopping outlets and traffic flows has not been presented.

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Above all the Addendum is unsound because there has been minimal attempt to engage with the public on the issues involved.

1. The recent Government White Paper 'Communities in Control' wishes "to generate vibrant local democracy in every part of the country and to give real control over local decisions and services to a wider pool of active citizens."
2. There is a Government national priority for increasing community engagement. Specifically National Indicator 4 measures "the % of people who can influence decisions in their locality". The baseline for Wyre BC stands at 30% for 2007. The target has been set to increase this to 40% in 2010/11.
3. Appendix K of the POD gives the responses of the public to the three Options proposed. Out of 74 individuals who responded. Only 22 gave Option 3 (maximum development) as their preferred option with an additional 4 wanting a combination. With only 30-35% choosing Option 3 or a combination, this is hardly a ringing endorsement for the Preferred Option.
4. In response to the SD, only 5 individuals made a representation directly to WBC (although 50 residents approved the response of TAG). There was unanimous agreement that the SD was unsound.
5. The involvement of the public is not helped by the, I must say, patronising response of WBC to the concerns raised by the residents. "Unfortunately the subject is complicated throughout the consultation process. The consultation process complied with the Council's SCI and legal requirements. It is very unfortunate that the respondent found it difficult to understand and get involved" (see Response 816).
6. Question 4 on the Addendum Representation Form states "Do the proposed changes meet your previous concerns?" This could be interpreted as ruling out any resident who has not expressed a previous concern.
7. It is the responsibility of WBC to phrase the questions and set out the representation form in a manner that can be grasped by the public. This was the case for both the Issues and Options and the Preferred Options Documents. Sadly the lack of clarity in the SD resulted in only 5 responses from individuals and this obfuscation has continued in the Addendum.
8. Not all documents which it is necessary to consult so that a meaningful representation can be made by the public have been made available – for example in Thornton Library. For example, where do residents read the full Report from Buchanan and where are the data which underpin the proposals for junction improvements on the A585? Where are the Fylde Coast Retail Study and the WYG Retail Assessment which it is necessary to consult in order to comment on the proposals for a District Centre?
9. In addition to the failings of WBC to engage sufficiently the residents of Wyre, it must be noted that no information was made available to residents in Singleton, in Fylde Borough, who will be very much affected by proposals at 3 of the junctions on the A585.

What changes do you consider necessary to make the AAP sound?

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1. That a cumulative traffic assessment be carried out. This should provide up to date traffic flows and queuing times at junctions. The assessment should also include projections for traffic from ALL the developments in the AAP. The AAP needs to be based on a robust credible evidence base.
2. In the meantime that no major development (including PS1) be permitted to go ahead in the AAP Area until the necessary junctions improvements (essentially those specified in the RMP) have been completed. This was the policy as set out in the Issues and Options Document and the POD and approved by a majority of residents who submitted their views. This policy has been discarded in the Addendum and consequently residents would be opposed to Option 3. This surely questions the soundness of the AAP.
3. That a policy of co-ordination be written into the Addendum so that proposals and funding for the RMP and the contributions being asked for from developers can achieve a more effective and speedier solution to the problems on the A585. There has to be a clear mechanism for achieving this.
4. That a list of sustainable solutions to the traffic issues be provided together with costings and the degree of improvement they would bring. It is not a sound policy to allocate £10 million and not know what impact will be achieved.
5. That exceptional circumstances are not allowed to reduce the number of affordable houses on a development to below 30%. WBC must seek to reach the 500 affordable houses target which it has been set.
6. That land identified for employment use in the AAP is not reclassified for housing. It is essential that additional employment opportunities are provided so as to reduce both the unemployment numbers in Fleetwood and the amount of commuting from existing and planned homes in Fleetwood and Thornton. To provide even more land for housing must seriously question the soundness of the AAP.
7. That formal protection is given to safeguard Poolfoot Farm open space from development. This would add to the robustness of the AAP.
8. That the proposal for a District Centre be changed back to a Local Centre. It is not a sound policy to have such a development on the AAP adversely affecting existing shopping and community facilities.