

## Area Action Plan Public Examination March 2009

### Response of TAG to the questions raised by the Inspector for discussion

February 11<sup>th</sup> 2009

This response to the questions refers the Inquiry to the two responses previously produced by Thornton Action Group (TAG) i.e.

Appendix A Response of TAG to the Submission Document 24 04 2008 (RSD)

Appendix B Response of TAG to the Addendum Document 13 11 2008 (RAD)

Also attached are

Appendix C Results of a survey of new households on Stanah and Hillylaid Road Estates conducted by TAG in July 2002

Appendix D Additional comments on the questions raised by the Inspector

Appendix E Pamphlet produced as part of the Fylde Coast Study Public Consultation 2004-5.

Appendix F

- 1 Issues raised with Colin Buchanan Consultants (CBC) concerning the Traffic Survey presented by WBC as part of the Addendum in a letter to WBC 01 02 2009.
- 2 Response by CBC to these issues.
- 3 Reply by TAG via WBC to CBC 11 02 09

Appendix G A 585 Timetable for Improvements – Route Management Plan 2004

### **Schedule of Matters and Issues for Examination.**

#### **1 Legal Requirements and Cohesion Issues**

*ii Has the AAP been prepared in compliance with the Statement of Community Involvement and met the minimum consultation requirements in the 2004 Regulations?*

It is TAG's assertion that the AAP has not been prepared in compliance with the SCI, for reasons set out in Appendix B RAD p5 paras 2-7 and Appendix D Section 1

*v Are there any environmental, economic and social implications arising from the Addendum that are not already covered in the SA and the Appropriate Assessment?*

Key issues addressed in the SA which forms part of the Preferred Option Document have not been taken into account in the SD and the subsequent AD. This specifically refers to the A 585 (see RSD 2.5) and other issues referred to in Appendix D Section 2. The change from a local to a district centre is not covered by the SA (see RAD p4 para 7).

*viii Does the AAP have regard to the WSCS and the LCS and do the key spatial planning objectives of the AAP align with the priorities in these sustainable community strategies?*

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The LCC request for more emphasis and strategic guidance regarding the Area's green strategy has not been addressed (see RSD 2.7)

#### **2 Spatial Framework**

No further response

#### **3 Environmental Quality and Protection**

*v Is the approach to the protection of landscape character and cultural heritage appropriate and justified, consistent with national and regional planning policy in particular PPS7, PPG 15 and PPG 16?*

TAG raised the issue of the fields at Poolfoot Farm (see RSD section 6 Recreation and Leisure 6.4 – 6.6) but its concerns about the future of the open space are still not adequately addressed (see RAD Section 5 5.1,5.2). TAG proposes that formal protection be given (see RAD p7 para 7).

*vii Is the extent of the Green Belt soundly based and justified, consistent with national and regional policy in particular PPG2?*

The Green Belt within the AAP seems to be limited to the Cala Gran Caravan Park! There is a need and an opportunity to complete the Green Belt which is designed to separate the built up areas of Fleetwood and Thornton-Cleveleys by extending it to the Estuary.

*viii Is the approach to recreation provision in Policy 8 appropriate, justified and achievable?*

We question whether sufficient funding from developers will be found given the opportunities missed and the present uncertainty (see RSD 6.1, 6.2, 6.3, and 6.7). The amount provided could be very small (see RAD 5.3, 5.4). We are aware of the difficulties encountered even in providing minimum recreation space on new developments in Thornton.

#### **4 Housing Provision**

*vi Are the affordable housing targets and thresholds viable in terms of housing delivery and sufficiently flexible to respond to a variety of changing circumstances?*

What are the targets referred to – ie are they the 40% target which is the Policy of WBC or the £1.2 million contribution from FD1 (for 12 houses) plus the 17% now reduced to 10% from PS1? Regarding viability then insufficient information has been

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made available on costs of land purchase, costs of development including remediation measures and the rental value of the development when finished to assess whether the contributions by developers to affordable housing are justified in relation to FD1 and PS1 and what contributions will be forthcoming from FD2 and PS2.

*vii Are they soundly based on robust and credible evidence, consistent with national and regional planning policy in particular PPS3?*

A Consultant's Report for Wyre BC identified the need for affordable housing at c500 dwellings. Very few have been built since the Report was published. The AAP should have provided the opportunity to make up this deficiency (see RSD section 5 and RAD section 4). It is difficult to see any other feasible approach.

TAG proposes that a much higher % of new dwellings in the whole of the AAP should be affordable (see RAD p7 para 5) in order to meet the need that has been identified..

## **5 Industry, Business and Tourism**

*v what are implications for employment provision of a significant increase in housing provision within the AAP? Is the approach to increasing housing provision clear, appropriate and soundly based?*

This is a question which has not been considered by WBC in its haste to build houses (see RSD 7.5 re Growth Point Bid).

As part of the evidence presented to the Poolfoot Inquiry, a survey was carried out in 2002 by TAG on the new estates on Stanah and Hillylaid Roads in Thornton. The results are reproduced in Appendix C.

1300 new dwellings on the AAP at 1.55 people in employment per dwelling (154 people from 99 dwellings) results in 2020 additional jobs being required. There is already a high rate of unemployment in Fleetwood and Thornton North. Some increase in employment can be expected on the Hillhouse Site, at the Waste Processing Plant, Power Station etc, but just how many given the carrying capacity of the A 585? This fundamental issue was addressed by the Lambert Smith Hampton Study (2005), which forms part of the AAP and is referred to in RSD 3.2 – 3.4.

Without an increase in employment locally, additional housing will only result in more commuting. 75% of workers on the new estates surveyed by TAG travelled to work outside Thornton and Fleetwood. Thus out of 2020 additional people in employment, 1513 will be commuting out of the Area each day. With 93% using their car this could add 1400 extra vehicles at peak times, 772 to the already congested A 585 and a further 634 having to get across the A585.

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TAG proposes that all land identified for employment use in the AAP is inviolate and not released for more housing (see RAD p7 para 6).

#### **6 Community Facilities and Service Provision**

*iii Is the scale and type of local service centre proposed in Policy 7 appropriate when considering reasonable alternatives and is it justified by robust and credible evidence?*

A District Centre is far too large to serve just local needs (see RAD p4 7.2).

*v Is it clear what is proposed and what the implications would be for emerging plans and strategies and for the vitality viability and regeneration of existing centre especially Thornton, Fleetwood and Cleveleys?*

No evidence has been presented in the AAP on the need for a District Centre (see RAD p5 7.3, 7.4) or its effect on local shops and services and existing centres.

*vi Is the local service centre deliverable having regard to the level of associated housing, the possible need to relocate the football club and the requirement to provide health and other community facilities?*

Many of the claims for the advantages of a District centre are unsubstantiated and in the case of the proposed Medical Centre, untrue (see RAD p5 7.5, 7.6).

TAG proposes that the whole idea of a District or even Local Centre be reassessed. The football club could be developed to form a part of a recreational facility (see RAD p7 para 8). Any development should avoid the possibility of a centre which is only partially economically viable and could become subject to vandalism and anti-social behaviour.

#### **7 Movement, Accessibility and Transport Network**

*i Is the broad approach of demand management, sustainable transport measures and highway improvements soundly based and deliverable?*

The link from the M55 to the North Fylde has been an ongoing issue since the Red Route was adopted in 1992 and then shelved in 1994. This is succinctly explained in the background section of the pamphlet produced as part of the Fylde Coast Study Public Consultation in 2004-5 (Appendix E). As a result of this consultation the yellow route was chosen as the most preferred option although recently attention has been focussed on the blue route.

In the meantime the HA had carried out its Route Management Survey in which appeared the Key Data Report on the A 585 produced by Parsons Brinkerhoff (July 2003). Their conclusions were embodied in the Route Management Plan where

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improvements were identified as being needed at 8 junctions on the A 585 from West Drive to Windy Harbour. The timetable for the planned improvements is shown in Appendix G. Many of the improvements are short term priority.

Therefore an approach of demand management and sustainable transport measures to be followed by highways improvements is not soundly based because it ignores all previous reports about traffic on the A 585. Indeed it ignores the recommendations contained within the AAP Preferred Option Document (see RSD 3.5, 3.7-3.10).

TAG urges that a fully comprehensive and cumulative traffic assessment based on reliable survey data and projections, is required to assess the impact of all developments which affect the A 585. These would include all the developments within the AAP already passed by the Planning Committee and developments lying outside the AAP, both existing and envisaged including those developments in North Blackpool which would materially affect the A 585 from the Norcross Roundabout (see RAD p6 para 1).

*ii What are the demand management measures envisaged?*

No details or assessment of what sustainable measures are envisaged are given (see RAD 3.2, 3.3).

TAG proposes that this be done so that the cost-benefit analysis of any measure can be assessed (see RAD p6 para 4).

*iii What are the mechanisms for delivery and future maintenance of sustainable transport measures?*

*iv Are the assumptions about likely trip generation supported by robust and credible evidence?*

A series of questions has been raised with Colin Buchanan Consultants relating to the Traffic survey carried out for NPL and presented by WBC as part of the Addendum (see letter to WBC 01 02 09 and subsequent correspondence - Appendix F)

*vii What are the nature, extent and feasibility of the highway improvements that are likely to be required?*

TAG has studied in some detail the junction improvements suggested in the Addendum and has concerns about the safety issues and indeed overall effectiveness of what is proposed (see Appendix D Section 3)

TAG proposes that details of the junction improvements need to be reconsidered especially regarding safety for cyclists and pedestrians. The RMP emphasized the improvements in safety for all road users.

*viii Are the triggers for provision and the mechanisms for delivery clear and soundly based?*

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The trigger has already been passed with approval of PS1, Waste Processing Plant etc without the necessary funding to improve the A 585 (see RSD 3.7 – 3.10).

TAG proposes that the principle set out in the Preferred Option Document of no major development without improvements to the A 585 be adopted (see RAD p6 para 2).

*ix Are these improvements deliverable within the timescales required to cope with additional traffic that may be generated?*

The funding required has not been forthcoming so far. Only a limited amount of development still remains for approval and from which developers' contributions might be gained. Since sustainable measures are given priority the concern is that no money will be available for the desperately needed improvements on the A 585 (see RSD Section 4 and RAD 3.4, 3.7, 3.8).

TAG proposes that co-ordination between the WBC and other LAs, LCC, HA and the developers occur so as to secure a solution to the A 585 traffic problems (see RAD p6 para 3). This must set out in the AAP.

*x Are the improvements flexible enough to deal with changes in housing mix, employment and rate of delivery of development?*

TAG is concerned that only a limited number of developments remain to be given approval and that it is very uncertain whether the sums necessary will ever be realised (see RAD 3.1, 3.4, 3.8). Surely the developments at the Bispham Technology Park and the new housing development at Norcross should contribute to the improvements to the A 585.

**8 Implementation and Monitoring**

No further response