

**PUBLIC INQUIRY APP/U2370/W/15/3133536**

**Thornton Action Group (TAG)**

**Proof of Evidence**

**to be presented by Howard Phillips, Vice-Chair of TAG**

**at the Public Inquiry**

**into the refusal by Wyre Council**

**for the development of 165 houses**

**by Wain Homes at Lamb's Road, Thornton**

**(14/00553/OUTMAJ)**

- **Introduction**

1.1 My name is Howard Phillips. I have been Vice-Chair of Thornton Action Group (TAG) for the past 5 years. Previous to that I was the Chair. I have a B.A. and an M.A. in Geography from the University of London and a B.Sc. in French from the University of Central Lancashire. I have taught Geography in school, college of education, polytechnic and University where I was Head of Geography. I am now retired.

1.2 TAG was formed in 2001 by a group of Thornton residents who were concerned about what was happening to their environment. At that time a considerable amount of housing was being developed on land formerly owned by ICI (and previously required as a buffer zone between hazardous industry and housing), without consideration of the necessary provision of open spaces, services and improvements to the transport network.

1.3 The objectives of TAG then and now remain the same.

- To find out and inform the residents of Thornton about proposals which affect the community.
- To find out the views of the residents and to make these known to the relevant local authorities and statutory bodies.
- To foster community spirit in Thornton and help make Thornton a better place in which to live and work.

- **Local Plan Issues**

2.1 This proposal is for development on land designated as 'Countryside Area' and should only be considered for development after other areas have been developed.

The Local Plan much of which is out of date ran from 1991 to 2006. The New Local Plan will not be ready until 2017 at the earliest. The land at Lamb's Road is not scheduled for housing under the previous Local Plan and not included for housing development in the Preferred Options Document (consulted upon in 2012) of the New Local Plan.

This land is part of the "Countryside Area" identified in previous Local Plans. Although it does not carry the same weight as "Green Belt" designation, it does offer some protection against development, compared with other areas not so designated.

As part of the consultation documents for the New Local Plan, Wyre Council commissioned the Green Infrastructure Survey which would help identify how much green space would be needed in the future in the different communities in Wyre. This was due for publication in the summer of 2014,

but is still not completed. It is important that the GIS be taken into account when applications for large scale housing developments are being considered.

## 2.2 Preference should be given to brownfield sites.

The Area Action Plan (AAP) 2009 refers to the future development of land in North Thornton and Fleetwood. Land is earmarked for 800 dwellings, mostly on brown field sites in Thornton. Figures at 31.03.2015 (provided by Wyre Council) show that only 196 dwellings out of the 800 have been completed or are under construction which comprises 25% of the total. This compares with 159 dwellings at 31.03.2014, so just 37 dwellings were added over the one year period. Unconfirmed figures show that just 21 dwellings were added in the one year period to 31.03.2106. The NPPF 2012 (para17) states that Planning Authorities should “encourage the effective use of land by reusing land that has previously been developed (brown land)”. Permission given for development on green field sites such as Bourne Way (100 houses) has slowed down the rate of house building within the AAP to almost nothing and if permission were given for the Lamb’s Road development that would in fact mean no houses would be built on the brown land within the Thornton part of the AAP where there is space for a further 583 dwellings.

## 2.3 Approval should not be given to a development which is part of a much larger scheme until the impact of the larger development is properly assessed.

The application being considered is for 165 houses off Lamb’s Road which is part of a much larger scheme for 600 houses as confirmed by Wain Homes in their application (Planning Statement from Sedgwick Associates June 2014 para 6.28). An indication of this is shown by the fact that in this application the access off Lamb’s Road is stated to be able to cater for the extended number of houses (428). *“It is anticipated that the site could contribute c150 dwellings to the 1-5 year period of the LP and a further 450 to the 6-15 year period”* (Wyre Local Plan Call for Sites 2014 Consultants’ Report on behalf of Wainhomes (North West) Ltd para 16). In addition the suggested layout shows road access to the green fields to the north and west. This number of houses increases to 924 when all the proposals for Lamb’s Road/Raikes Road are taken into account (Wyre LP Issues and Options Document). There is a real possibility that allowing this appeal for 165 houses will result in the full development of 924 houses across Lamb’s Hill being approved.

Approval should not be given to this development which is just a piece of a much larger development. The impact of building houses across the whole area needs to be assessed particularly with regards to traffic and highways, as well as recreational space, employment, schools, medical and other facilities.

2.4.1 In the Planning Officer’s Committee Report (5<sup>th</sup> August 2015 paras 9.15-9.17) it was stated that “The Council is not able to identify a supply of deliverable sites sufficient to provide a 5 year supply of housing against a housing requirement based on the objectively assessed needs presented in the SHMA”. This housing requirement lies between 340 and 485 dwellings per year i.e. between 1700 and 2425 over the 5 years.

2.4.2 This range varies between a lower projection by the ONS (340) based on current employment levels and 485 (Experian and Oxford Economic) which presumes a notable expansion of in-migration and employment. It should be noted that the increased numbers of jobs predicted are not necessarily located in Wyre, as the increase in the levels of commuting to work to areas outside Wyre show.

2.4.3 The figure for the housing requirement has not yet been finalised as was demonstrated by the recent consultation on the Issues and Options Document of the Local Plan which did not establish the number of houses which would be needed in the Local Plan period (2011-2030).

2.4.4 According to Wyre Council statistics there are 2063 dwellings (as of March 31<sup>st</sup> 2015) which are considered deliverable in the next 5 years. In addition approximately 680 new dwellings have been granted planning permission for the first time between 1<sup>st</sup> April 2015 and 29<sup>th</sup> February 2016. A further 100 dwellings at Oldfield Farm, Poulton have to be added bringing the total to 2843. On the 2<sup>nd</sup> March 2016 another 520 dwellings were approved by the Planning Committee. This would add c150 dwellings to the figure giving Wyre a total of 2993, which means that c600 dwellings could be delivered each year for the next 5 years.

2.4.5 Given a range of between 340 and 485 dwellings required per year in the Local Plan Period, the 5 year housing requirement including the shortfall since 2011 lies between 2188 and 3493. Thus it is not possible to claim that this development of 165 houses is essential in order to fulfil the 5 year housing requirement of Wyre.

2.4.6 More detailed figures concerning the 5 year housing supply of Wyre and the region are presented in the Proof of Evidence by Ashley Cutts of Save our Stanah.

### **3 Traffic**

#### **3.1 Poolfoot Farm Public Inquiry (APP/U2370/V/02/1086527)**

Almost immediately after it was formed TAG was involved in objecting to the proposal to build 510 houses on Poolfoot Farm fields in the north of Thornton.

That Inquiry took place in September 2002.

The Secretary of State agreed with the inspector's conclusions and refused planning permission.

One of the reasons is contained in par 287 (p42) of the Inspector's Report (09.12.2002).....

*"Indeed the ESP recognises that the A585(T) is currently operating close to capacity and that small scale improvements are insufficient to resolve the problems. The provision of an additional 510 dwellings would certainly add to those problems. I consider that the proposed development would have an unacceptable impact on the free flow of traffic" (see Appendix A).*

#### **3.2 Fleetwood-Thornton Area Action Plan 2008 (AAP)**

3.2.1 TAG participated fully in the Public Hearing held in 2008 into the Wyre Borough Council's proposed Fleetwood-Thornton Area Action Plan. Schedule 1 Annexe 3 Table 4.2 (Appendix B) shows that flows arising from the AAP developments (which included 1300 dwellings) are projected to increase traffic at certain junctions on the A585 by 36% at Skippool Roundabout and 41% at Shard Lane. In order to mitigate the effects of the development, Section 106 monies totalling £10 million

for sustainable transport measures and a further £10.4 million for improvements to the junctions on the A585 were required. To date just £215,000 has been received for improvements to the network. None of this money has actually been spent.

3.2.2 Since the AAP was agreed, a number of other housing developments in Thornton have been given planning permission. Construction has begun of 100 houses on Bourne Way and 109 houses at Ashdell Nurseries and the former Council Depot. There are in addition 150 houses on the site of redundant offices at Norcross.

3.2.3 At no time during the AAP or since has any consideration been given to the housing developments taking place in Blackpool Borough where a considerable number of houses have been completed or are under construction between Faraday Way (a new link to the A585 at the Norcross Roundabout) and Ashfield Road. None of these developments has contributed Section 106 money to the improvements desperately needed on the A585 despite the obvious evidence that there will be an adverse effect.

3.2.4 We have highlighted how the development of 510 houses at Poolfoot Farm was refused because of the impact on the A585. The AAP gave planning permission for 1300 houses in Fleetwood and Thornton North and recognised that improvements to the A585 were needed. Since then permission has been given for a further 359 houses in Thornton. Improvements to the A585 funded by HE have been made at Windy Harbour and West Drive/Bourne Way. Bottlenecks still remain at the junctions of Victoria Road, Norcross, Skippool Roundabout, Shard Lane and Singleton Cross Roads which lead to serious congestion at peak times.

3.2.5 The following figures show the increase in the Annual Average Daily flow on the A 585 between Thornton and Windy Harbour since 2000 (Source Highways England).

|                           | 2000  | 2007  | 2014  | %increase 2000-14 |
|---------------------------|-------|-------|-------|-------------------|
| West Drive to Morrisons   | 19451 | 18608 | 20697 | 6.4%              |
| Norcross to Skippool      | 26566 | 29551 | 27289 | 2.7%              |
| Skippool to Shard Lane    | 27665 | 26310 | 29288 | 5.9%              |
| Shard Lane to Singleton X | 22067 | 23988 | 24124 | 9.3%              |
| Singleton X to Windy Harb | 23273 | 23927 | 28255 | 21.4%             |

3.2.6 The Fylde Coast Highways and Transport Masterplan (July 2015) recognises the severe problems of congestions on the A 585. It is proposed that a connecting road be constructed from just east of the Skippool Roundabout to the Garstang Road, east of Poulton, thus relieving the traffic on Mains Lane. However, from Garstang Road, traffic will still need to access the M55 via Singleton Cross Roads.

3.2.7 Moreover, in the 1990's it was agreed that a new road was needed from Junction 3 of the M55 to Poulton, Thornton and Fleetwood. The route chosen was the Fylde Coast Easterly Bypass (the Red Route). This plan has now been shelved. In 2004 the Highways Agency produced the A 585 Route Management Plan which gave details of the improvements to be carried out at the junctions of the A 585, together with costs and a timetable for construction 2006-2009. Improvements were made at just two of the junctions (Windy Harbour and West Drive) in 2015.

3.2.8 Thus planning decisions taken in 2016 cannot be made on the assumption that improvements to the road network will be carried out.

### **3.3 Lamb's Road Application 2014 (14/00553/OUTMAJ)**

3.3.1 Two of the issues which the developers recognise as already causing problems and will cause more problems, are the congestion at Skippool Roundabout and the bend in Skippool Road at Silcock's Corner (Thornton Hall Mews). These issues were recognised by LCC Highways in its consultee response (20 Nov 2014 p.8 D2/14/00553/GR) from Glenn Robinson which states

*"Skippool Road suffers from severe southbound congestion in the AM peak. This is a result of traffic using the River Wyre Roundabout. The River Wyre Roundabout has lengthy queues in both the AM and PM peak hours.*

*"There is a section of Skippool Road where the available width for pedestrians is below 1m on one side (no footpath exists on the opposite side at this point)".*

LCC objected to this application on ....

- Lack of network capacity
- LCC consider the proposal as presented will not deliver sustainable development.

3.3.2 These comments were replaced by comments made on the 11<sup>th</sup> June 2015 by Neil Stevens (D2/14/00553/OULMAJ/NJS1). The developers propose to construct a short length of additional new lane on Skippool Road to alleviate the congestion at Skippool Roundabout which LCC then conclude *"offer some limited benefit. However, it does assume that conditions downstream are not impeded"*. This is the major problem which has not been addressed. As the photograph below shows it is the queuing of traffic on the A585 along Mains Lane which

prohibits a free entry to the roundabout from Skippool Road.



3.3.3 Secondly it is suggested the problem of the acute bend at Silcock's Corner can be overcome by white-lining plus an active speed sign for the duration of the construction period. This will do little to alleviate the dangers of HGVs and local service and school buses which cannot negotiate the bend without swinging out. TAG, together with County Councillor John Shedwick approximately 6 years ago, met with LCC Highways who on being presented with photographic evidence (see below) agreed that this was indeed a safety issue and notices "unsuitable for HGVs" were placed at the Skippool Road exit of Skippool Roundabout and at the approach to Lamb's Road by Stanah School. Why has LCC Highways changed its position?



3.3.4 Moreover, the narrowness of the footpath (see photo right above) in front of Thornton Hall Mews is not considered. The concerns of those who live in Thornton Hall Mews, who are still suffering from the passage of HGVs using Skippool Road despite the signage, has been highlighted by others. Moreover, the footpath which extends from Silcock's Corner to the junction of Woodhouse Lane is extremely narrow and on one side only of the carriageway which itself is narrowed by the constrictions imposed by the hedge on the opposite side.

3.3.5 Someone pushing a baby carriage or someone in an invalid carriage cannot continue past Silcock's Corner without going into the road on what is a dangerous blind bend. For cyclists and pedestrians this road is not safe and cyclists and pedestrians avoid using it. The statement by

WYG on behalf of the applicant that “good connections are provided on foot” is not correct, so that the claim by the appellant that the rail network at Poulton is easily accessible for pedestrians and cyclists is nonsense.

3.3.6 We urge that representatives of LCC Highways as well as Highways England are invited to the Hearing to answer why the earlier comments from Glenn Robinson, an officer who has considerable experience of involvement in consultations such as these over many years, were subsequently removed and how the minor modifications proposed by the developers will solve the problems in any satisfactory manner.

3.3.7 The attention of the Inspector is drawn to the refusal of planning permission for 10 houses on Skippool Road between the site on Lamb’s Road and Silcock’s Corner (14/00845/OUTMAJ 15<sup>th</sup> January 2015 – Appendix C). The second reason for refusal is given as “*safe vehicular access from the site onto the highway network either via Skippool Road or Woodhouse Lane would not be provided due to the existing condition of those roads and prevailing levels of traffic and congestion. As such the proposal would be contrary to saved policy SP14 of the Wyre Borough Local Plan (1999) and the provision of the NPPF (para 32)*”. The Head of Planning Services Wyre Council needs to answer why this application was refused yet the present application for 165 houses further along the same road was recommended for approval by Wyre Planners.

## **4 Questionnaire Survey of Households between Stanah Road and Hillylaid Road**

### **4.1 Introduction**

During August 2014 members of Thornton Action Group and Save our Stanah carried out a questionnaire survey of 271 houses of the new estates (built 12-14 years ago) between Stanah Road and Hillylaid Road.

This resulted in 147 questionnaires being completed, a response rate of 50.5%.

The reason for choosing these estates was to predict the impact that the building of houses on Lamb’s Hill would have on school numbers and traffic. The application (14/00553/OULMAJ) which has been submitted to Wyre Council is for 165 houses but this forms part of a much larger development as shown in the SHLAA, extending eastwards from Lamb’s Road to Raikes Road (600 houses) and to Underbank Road (a total of 901 houses). This application from Wain Homes refers to a total of 600 houses between Lamb’s Road and Raikes Road.

Also attached are the questionnaire (Appendix D) and a summary of the results (Appendix E)

It is worthwhile comparing the results of this survey with those of a similar questionnaire survey undertaken in July 2002 by TAG and presented as evidence to the Poolfoot Farm Inquiry (Appendix F). This indicates that both the 2002 and the 2014 surveys produced results which are reliable.

### **4.2 Schools**

- 4.2.1 The TAG/SOS Survey shows that the number of pupils of primary school age per dwelling is 0.46. With 165 additional houses this results in the need for an additional 76 primary school places.

It is noted that LCC has calculated that the development of 165 houses off Lamb's Road will result in the need for 63 primary places which is based on a figure of 0.38 children of primary age per dwelling and that the money will be provided by the developer to fund places at Stanah School (LCC Education Contribution Assessment 30.07.2015 pp4-5).

TAG wonders how this extra number of children can be accommodated given that the projections show there to be shortfall in the area of 124 places in 5 years' time.

- 4.2.2 The TAG/SOS Survey shows that the number of pupils of secondary school age per dwelling is 0.32 which leads to the predicted need of 53 extra secondary places. The corresponding figure from LCC is 25 places based on a rate of 0.15 pupils per dwelling.

The LCC figure seems extraordinary low given that the children of primary school age will move on to secondary education. The provision of 25 additional places at Baines School on the southern edge of Poulton is illogical given the difficulties and dangers of travel from Lamb's Road across the A585 and through the congested centre of Poulton.

- 4.2.3 Indeed the analysis of the answers as to how the children get to school reveals, as to be expected, that when the school is not within walking distance the children will be taken by car which obviously adds to the congestion particularly at morning peak times.

- 4.2.4 Of the primary children who did not attend either Stanah or Baines Endowed Schools, then 92% are taken by car. Regarding Secondary pupils only 6% walk or cycle (all to Millfield), 29% use a bus and 65% get taken by car.

The proposal to accommodate the additional number of pupils of primary school children at Stanah School is to be welcomed. However, the choice of Baines School in Poulton raises serious questions about traffic safety and congestion. It is noted that secondary school provision for the 520 houses approved in March 2016 on Garstang Road East, Poulton will be at Millfield School in Thornton.

- 4.2.5 Given that approval for this proposal would open up the rest of the Lamb's Hill development (a total of 924 houses) it is imperative that the necessary land is earmarked at the outset for the new primary school which will be needed.

The new Local Plan identifies the possible development site for 924 houses without considering the educational provision for the new population.

**This is a major reason why the application should be refused.**

#### 4.3 Traffic

- 4.3.1 Regarding travel to work the answers to the TAG/SOS questionnaire (see Questions 4-8) reveal some important differences from the Traffic Assessment undertaken by WYG for Wain

Homes as part of the Planning Application (see Section 6). WYG also refers to a larger scheme “*the development proposals form part of a wider residential development*” (para 1.1.3).

4.3.2 The TAG/SOS Survey shows that 260 people are in employment, an average of 1.77 per dwelling.

92% of the journeys to work are made by car and of these over two thirds (68%) are made via Skippool Road and Skippool Roundabout, compared with under one third (28%) which use Thornton centre.

The Traffic Assessment (TA) is that there would be a 50/50 split. This is a computer generated figure which does not take into account the opportunities for work across the Fylde Peninsula and beyond. It seriously underestimates the number of cars which will use Skippool Road.

Moreover, the TA underestimates the amount of traffic which will be generated with 0.442 trips per house between 8:00 am and 9:00 am compared with the survey data of 0.65 trips. Again the TA estimate is a computer generated figure which does not take into account the lack of transport facilities in the area and the geography of employment.

4.3.3 The pinch point is Skippool Road and Roundabout where the development of 165 houses on Lamb’s Road will add an extra 77 trips between 7:30 am and 8:30 am

600 additional houses results in an extra 278 trips whereas 924 houses results in 428 additional trips via Skippool Road in the morning rush hour.

4.3.4 At present the queue of traffic waiting to access the Skippool Roundabout at the morning peak hour often stretches back past Silcock’s Corner.

The additional traffic from the proposed development will extend the queue back beyond the proposed access to the new development.

Further housing would create gridlock in Thornton Centre and impact seriously on two primary schools – Stanah and Baines.

4.3.5 The results of the survey were sent to Wyre Planning, Lancashire Highways and Lancashire Education Department.

We received no acknowledgment from Wyre Planning nor the Education Authority.

Lancashire Highways state that “*they are aware of the survey and will bear it in mind*”. They obviously have not. We welcome this opportunity to present the findings of the Survey to this Planning Inquiry.

- **Conclusion**

Para 9 of the NPPF states that sustainable development involves “improving the conditions in which people live, work, travel and take leisure”. There is no evidence to suggest that the new housing developments in Thornton will lead to additional jobs being created in Thornton. In fact

the 2011 Census shows that there is a net outflow of workers from Wyre to other Boroughs of 10,821 which is an increase of 3.3% compared with the 2001 Census. That means an extra 1327 commuters being added to roads already saturated at peak times. This has occurred despite the increase in the population of Wyre from 105,619 in 2001 to 107,749 in 2011. Thus the advantages of additional homes are heavily outweighed by the fact that increasing numbers of the population will be commuting to work using the car, giving rise to unacceptable congestion at peak times. In addition the development would mean the loss of the most attractive area of green land which is left on the Fylde Coast Peninsula. We ask the Inspector to recommend that the appeal be refused and that the decision by Wyre Council be upheld.

**Howard Phillips - Vice-Chair, Thornton Action Group**

**2<sup>nd</sup> June 2016**

### **List of Appendices**

- A Inspector's Report to the First Secretary of State 09.12.2002 Poolfoot Farm Inquiry  
APP/U2370/V/02/1086527 p42
- B Thornton Area Action Plan Sustainable Transport Strategy Table 4.2 Total Traffic Flows on the  
A 585 and Fleetwood Road Junctions with and without the proposed AAP developments p9
- C Wyre Council Refusal of Planning Permission 14/00845/OUTMAJ land at Skippool Road 15.01.2015
- D Residents' Survey Letter from TAG/SOS August 2014
- E Residents' Survey Results TAG/SOS August 2014
- F Residents' Survey Results TAG July 2002
- G Projected populations for 4 Fylde LPAs