Lambs Road/Raikes Road Masterplan

Public Consultation – Summary of Main Matters

Background

Wyre Council's Planning Policy team has been responsible for facilitating the masterplanning process which has been led by Emery Planning on behalf of the landowner group. It has involved extensive collaborative working between Wyre Council, landowners and relevant stakeholders. A draft masterplan was the subject of a public consultation period between 25th September 2020 and 6th November 2020. The council received 48 responses from residents and organisations.

As a result of a representation received on behalf of Baxter Homes, the council undertook a second period of public consultation which ran for four weeks from 19 February to 19 March 2021. The purpose of the second consultation was to seek views on a proposed vehicular access from Raikes Road into land in the control of Baxter Homes. As part of the consultation an alternative pedestrian/cycle route from Raikes Rd to Lambs Rd via Woodhouse Road was proposed. The consultation also proposed stronger wording within the masterplan document designed to ensure internal vehicular and pedestrian/cycle connectivity between parcel 3A and 3C.

The council received 76 responses to the second consultation, the majority from local residents.

Both consultations were publicised by the delivery of summary leaflets to all properties in Stanah ward. The planning policy consultation database was used to send out newsletters to statutory consultees, organisations and private individuals. All ward members and the county councillor were contacted by e-mail and key stakeholder organisations were also directly contacted by e-mail.

The council's social media channels were utilised to promote the consultations.

Public Consultation 2020 - Summary of Main Matters

In total the council received 48 responses to the first consultation, the majority of which were from local residents raising concerns/objections. A number of stakeholder organisations also responded as listed below. Some of these responses covered matters of detail more relevant to a planning application.

- Historic England (no comment made)
- Local Education Authority
- Network Rail
- Fylde and Wyre CCG
- Natural England (no comment made)
- Lancashire County Council Archaeology
- National Grid (no comment made)
- Homes England (no comment made)
- Sport England
- Lancashire County Council Highways Authority

- Lancashire Wildlife Trust
- Environment Agency
- National Union of Farmers
- United Utilities
- Greater Manchester Ecology Unit

A response was also made by the Thornton Action Group, Thornton Flood Action Group and County Councillor John Shedwick.

A number of key themes emerged from the consultation with a particular focus on the impact the proposed development would have on existing traffic congestion, particularly at peak times. Key themes that have emerged are:

- Highways and movement
- Location of the school
- Green infrastructure and ecology
- Design and layout
- Flood risk and drainage

Highways and movement

- Highway safety concern regarding the access location for Phase 2 opposite Birkdale Close.
- Highway safety concern that children walking to the new school from Sunningdale Avenue would have to cross Lambs Road on the brow of a hill.
- Concern that pedestrian access from Raikes Road to Baxter development could be converted to vehicular access
- Highway safety concern regarding pedestrian and cycle access points onto Raikes Road due to lack of visibility
- Proposed improvements to Thornton Mews Road are not sufficient
- No parking shown for school or shop highway safety concern relating to number of parked cars on Lambs Road.
- Road layout around the open space should be one way to ease drop off times for school.
- Direct vehicular access is required onto Raikes Road is required for Phase 3.
- Site for the proposed school should not be accessed onto Raikes Road
- The Masterplan should reflect the outcome of the Appeal which identified that highway works would be necessary to support anything above the quantum of development for Phase 1 and 2.
- The Highway Authority requested that "second principal access point" (Page 10) is changed to "secondary access point" as it is misleading.

School provision

- Concern that the school will not be completed until after Phases 1 and 2 constructed and that therefore children from those Phases will go to school elsewhere resulting in more children being brought into the site increasing traffic.
- The school should be repositioned adjacent to the area of open space to create a better buffer/transition zone than the dwellings shown on the plan.

- The location of the school is poor, at the back of the site accessible only by driving through the site. It should be located to the front of the site within Phase 2 development.
- The primary school should include provision for a nursery and make reference to the latest LEA guidance and equalisation arrangements (Local Education Authority).

Green infrastructure and ecology

- Kenyon Gardens should be included in the Open Space provision.
- More tree planting required.
- Question of whether a Great Crested Newt survey has been undertaken.
- Masterplan does not make reference to Functionally Linked Lane (FLL) as identified by English Nature, located in the southern half of the eastern boundary, which is an important zone for wildlife.
- Concern that there is no provision of a "substantive" area of open space as referred to in appeal decision 17/00951/OUTMAJ GMEU HRA P14 Appendix 14.
- The Green Infrastructure provision falls short of the requirement in Adopted Local Plan Policy HP9.
- No justification for excluding sport pitches from the GI typology (Sport England).
- There is no information provided to indicate the form of the "rural transition zone" and it is not illustrated on the map.
- Requests that a "green conservation" or "wildlife "buffer is provided between eastern edge of development and Raikes Road.
- Existing hedgerows and trees should be retained, any removed should be replanted
- LCC Wildlife Trust expressed concern that dich recommendations in the Ecological Recommendations Plan (Drawing No 2017 149d) have not been followed. They further request the inclusion of landscape species choice, use of local native species of local provenance.
- Support for biodiversity net gain (LCC Wildlife Trust and Environment Agency).
- Landscape and Habitat connectivity should be retained or re-created as part of detailed design.
- GMEU recommend species rich hedge planting, bolstering of existing hedgerows, wildflower seeding along hedge bottoms and corridors, provision of bat/bird boxes and the preparation of a Comprehensive Landscape and Habitat Creation and Management Plan.
- A wider buffer zone of Green Infrastructure is required around the pond to discourage recreational use of Functionally (FLL) land adjacent Estuary

Design and layout

- Confirmation is required as to what is meant by the term "organic extension".
- With reference to the Taylor Grange Map p 11 of the Masterplan there is no "stepping down" of properties and decrease in density towards outer edges to create an informal edge as stated in Masterplan. Clarification is required on how this principle will be incorporated into the design.
- The Masterplan does not indicate what form the "rural transition zone" will take and there is no indication of this zone on the map.

- The design proposal relating to the eastern boundary of the development along Raikes road is inadequate and does not take account of the design principles in Key Design Consideration 4 of the Adopted Wyre Local Plan.
- A more robust barrier is required between Phase 2 and the trust land in order to protect it.
- Sport England request that reference is made to principles of Active Design within the Masterplan to enable 10 principles to be used to guide future detailed applications. The school and store area in separate zones and need improved walking and cycle links.
- The Masterplan fails to recognise that there is more than one landowner and there is a risk of ransom strips being created that would destroy connectivity.
- The Masterplan fails to deliver connectivity between the Phases for pedestrians and cyclists and has no mechanism to achieve this.

Flood risk, drainage and surface water management

- Method of drainage at Ramper Pot is inadequate. Surface water from the site should drain into the main body of the River Wyre to avoid interference with existing watercourse.
- Does not agree with the statement in the Masterplan that consultation with Wyre Council has revealed that there is historic flooding due to lack of capacity in existing surface water drains and Hillylaid Pool.
- Flooding in area in 2020 has been the worse ever.
- Small area of Phase 3b has a small area of Flood Zone 3 and it should be demonstrated that there is no more vulnerable development proposed in Flood Zone 3.
- NFU express concern that the recent increase in rates of development in area have led to an increase in run off rates into adjacent farmland causing crop losses. Contributions should be sought to maintain surrounding farm drainage channels that are now receiving "urban" water.
- United Utilities express concern that the consideration of achieving sustainable drainage can be promised when a site comes forward in a piecemeal manner. A site wide drainage scheme should be provided alongside a SUDs strategy to consider at design stage the interaction of phases as this will have a significant impact on Design Principle 18 of the Masterplan.
- United Utilities encourages use of rainwater harvesting and grey water recycling to reduce pressure on public water supply and sewage system.
- Sustainable drainage and flood risk management should be considered as part
 of the landscape design process and linked to landscape proposals and
 considerations of how sustainable drainage network can be inter linked with
 wider landscape proposals for the site.
- Requests a thorough maintenance and management scheme imposed to ensure efficient working on site SUDs and site wide management for the lifetime of the development.
- GMEU recommends use of SUDs, incorporation of soakaways, infiltration trenches, permeable pavements, grass swales, green roofs, ponds and wetlands where possible into the scheme.

 Will the Masterplan include above sustainable drainage systems landscape features and permeable porous hard surfacing materials to reduce surface water run-off.

Other

- Transport Assessments (TA) should still consider the potential for increased footfall from developments to impact stations, as well as vehicle parking / cycle storage at stations. Any enhancements required to cater for passenger demand should be funded through developer contributions (Network Rail).
- Potential archaeological interest along the western side of Raikes Road (late 18th and early 19th century mapping appears to show a number of roadside buildings between the properties known as *Patchetts* and *The Raikes*). Given the known archaeological potential of the site, any planning application or applications to develop the site in line with the final masterplan should therefore be accompanied by an Archaeological Desk-Based Assessment (DBA).

Public Consultation 2021 - Summary of Main Matters

In total the council received 76 responses to the second consultation, the majority of which were from local residents raising concerns/objections. A number of stakeholder organisations also responded:

- Lancashire County Council Highways Authority.
- Historic England (no comment made)
- Natural England (no comments made)
- Highways England
- Environment Agency (no comments made)
- Local Lead Flood Authority
- Campaign to Protect Rural England (CPRE)

Responses were also received from ward Member Cllr Ken Minto, the Rt Hon Ben Wallace MP, County Councillor John Shedwick and the Thornton Action Group. These responses all raised concerns regarding the changes proposed by the Addendum document reflected in the summary of issues below.

- 1. The status and use of Raikes Road a primary concern of most of those residents making a representation was the perceived negative impact additional traffic would have on the use and character of Raikes Road, emphasising its narrow width and lack of footpaths. Comments included:
 - Raikes Road is a country lane primarily used by farm vehicles and for recreational use including walkers, cyclists and horse riders.
 - The additional traffic generated would exacerbate the risk of conflict with pedestrians, cyclists and horse riders.
 - Raikes Road is one of Thornton's last remaining natural walkways with no footpaths.

- The narrow width of the road and the lack of a reasonable verge poses a danger to the current highway users.
- Very few areas that allow two vehicles to pass each other.
- No provision to ensure that traffic leaving the Phase 3C land parcel will turn right and travel south onto Raikes Road.
- The road narrows further to the north to a width of 3.4m at the junction at Underbank Road and is wholly unsuitable for increased vehicular movements.
- The creation of an access onto Raikes Road will change the character of this section of Raikes Road as the existing hedgerow would have to be removed. It would create a suburban appearance whereas currently the section of Raikes Road north of Patchetts and the access to Thornton Hall Farm has a rural feel with the road being lined with hedgerows.
- 2. Road capacity and safety a number of representations expressed a concern that the proposal would have a negative impact on road capacity and safety in the immediately surrounding area. Comments included:
 - Raikes Road will struggle to accommodate two way traffic generated by the development.
 - The existing footpath on Raikes road is less than 1m wide and no footpath exists at all between Southdown Close and the proposed access to Phase 3C.
 - Due to the width of Raikes Road larger vehicle entering or leaving the site will cross onto the "wrong" side of the carriageway.
 - The corner where Baxter Homes propose to build the vehicular entrance is on a blind bend.
 - The junction between Lambs Road and Raikes road is on a dangerous bend where not just Raikes Road conjoins but also Woodhouse road. Deep concern that the junction with Raikes\Woodhouse and Lambs Road is extremely dangerous.
 - Existing properties along Raikes road which are not close to the proposed new path will be exposed to additional dangers from the increase in traffic.
- 3. Access/egress involving Raikes Road/Skippool Rd/Lambs road a concern about the impact of additional vehicles at the junction of Raikes Rd and the B5412 was expressed. Comments included:
 - Access/egress is already a problem, particularly turning right with the extra vehicles from the newly constructed Southdown Close.
 - Access onto Skippool Road/Lambs Rd from Raikes Road is poor and incorporates insufficient visibility splays for the increased volume of traffic onto this point, with a blind bends to both the south and north of this junction.
 - The creation of an access onto Raikes Road to serve the 30-40 dwellings will increase turning movements off Skippool Road/Lambs Road on an

- awkward bend with 2 junctions side by side Raikes Road and Woodhouse Road and could result in accidents at the junction.
- There is limited visibility for traffic coming from the right when exiting from Raikes Road with a double white line along the centre of the road.
- No additional provision is noted for vehicles travelling from the south and turning into Raikes Road which will create obstruction and queuing at this bend in the road.
- Access onto Raikes Road for 30 to 40 dwellings will have a clearly detrimental impact on highways safety, due to the narrow nature of the road, and poor visibility splays from both the junction onto Raikes Road and junction onto Skippool Road.
- The corner near to the junction with Underbank Road is dangerous due to the limited visibility for motorists travelling in that direction of walkers, cyclists and horse riders who are ahead but travelling at a slower speed.
- Have not considered the impact of more traffic heading north along Raikes
 Rd via Hillylaid road and on to Fleetwood.
- **4.** Pedestrian/cycle access to Lambs Rd via Woodhouse Road The proposed alternative pedestrian/cycle route to Lambs Rd via Woodhouse Road received a number of comments which included:
 - Woodhouse Road does not have a public footpath except at the entrance from Lambs and Raikes Road. Encouraging pedestrians to walk down Woodhouse is dangerous. Due to parking difficulties there are constantly cars parked which narrows the road.
 - Does not address the need to safeguard walkers and cyclists in the opposite direction towards Stanah.
 - The proposed footpath involves removing trees on the eastern side of Raikes Road, which have not been accounted for in the addendum, and will destroy the natural habitat of this important buffer zone to the estuary.
 - The suggested footpath across to Woodhouse would be unlit and therefore not used when dark. Potential to feel unsafe at night.
 - The footpath will involve residents having to cross Raikes Road and then walk down Woodhouse Road, which has no pavement, to cross the main road to access the bus stop on the other side. This complex junction involving Skippool /Lambs Road /Woodhouse /Raikes and Tarn Roads is on the main route to the A585. There is restricted visibility here and will be busier with additional traffic once the development progresses.
 - Loss of hedgerows, trees and wild grass verges.
 - Unclear how will disabled residents use this path. The foot path needs to be 2 meters wide down the entire route it also needs illumination and be disabled friendly.
 - The proposed route lies outside the Masterplan area. They will require separate planning applications and there is no guarantee that they will be built.

- Any measures designed to encourage walking and cycling within the area are welcomed (Highways England).
- **5. Connectivity** Some responses highlighted the need for internal connectivity between different phases of development. Comments included:
 - There is no need to create a separate vehicular access onto Raikes Road when the idea of the Masterplan is to create connectivity between all sections of the development.
 - The overriding principle of the Masterplan is so that development can be planned as a whole and not in separate sections. The Baxter Homes proposal undermines this principle.
 - With a separate vehicular access to Raikes Road the Baxter Homes development will not be integrated into the Masterplan site let alone the rest of Thornton.
 - Makes more sense to use the connectivity provided in the Masterplan to access the safer crossing and bus stops on Lambs Road.
 - Vehicle and pedestrian access to Phase 3C should remain through the new development as the existing Masterplan indicates where there will be adequate footpath, lighting and road space.
 - The separate vehicular access would lead to residents driving in both directions of Raikes Road to access schools and shops on their way to and from work ,which is contrary to the idea of keeping the vehicle access through the safer and wider roads (with footpaths) of the development.
 - The proposed access will not help "create a sustainable neighbourhood integrated socially and physically with Thornton Cleveleys".
 - A ransom strip situation is not a legitimate reason for changing the Masterplan, or for giving permission for an unsuitable and unsafe site access.
 - The different developers need to work together to ensure sustainable development for the entire site and integration of the various areas should be achieved via access off the more suitable Lambs Road.
- **6. Flooding** Some responses highlighted flood risk and impact on usability of the proposed walking route via Woodhouse Road. Comments included:
 - The proposed new access road would join onto Raikes Road in an area of the road which floods deeply at times of heavy rain. It is unsafe to allow a road junction to be built at this point, which will only exacerbate the problem.
 - Laying of any hardened surface could result in flooding to my property and garden.
 - The field with proposed 2 metre path floods onto Woodhouse Road currently and unless drains are proposed into the main drain it will flood even more.
 - Increased flood risk to adjacent properties.
 - The grass verge on Raikes Rd is subject to flooding.

Use of Sustainable Drainage Systems encouraged (LLFA).

7. Other – other comments included:

- The integral natural boundary of the development (proposed by the original Masterplan) on the Raikes Road side which creates a buffer zone to the land adjacent to the Wyre Estuary will be breached.
- Negative impact on wildlife from loss of trees and verge areas. The proposal from Baxter Homes would see yet more hedgerow being removed to give visibility to their entrance.
- Ecological and landscape mitigation should provide space on site, as off-site
 measures come with long term enforcement implications and should be
 treated as a last resort. The more mature trees that can be retained the
 better for biodiversity and human health and well-being, in addition to as
 many new trees and hedges as possible at the boundaries of the properties
 (CPRE).
- At no point during the Local Plan process was access from Raikes Road directly considered an appropriate alternative or possibility.
- Increasing the width of the entirety of Raikes Road would be required (with suitable traffic calming measures) and this should include cycle routes and footpaths on both sides of the road in BOTH the north and south direction of the site in question.

Lancashire County Council as the Local Highway Authority (LHA) raised a particular concern regarding the potential for pedestrian/vehicle conflict on the bend immediately south of the proposed vehicular access. The LHA acknowledge that an alternative route has been proposed via Woodhouse Road but note that this would only partially address the issue of pedestrian/vehicle conflict. The LHA have clarified that this refers to the fact that no mitigation is proposed to allow pedestrians to safely move north from the subject site along Raikes Rd towards Stanah.

The LHA raised a concern that if the Baxter Homes site was built out before Wainhomes Phase 3 unsafe walking routes would be used to gain access to the shop (within Phase 2), the school site and the existing school, as well as the wide Thornton area (note - the Masterplan Addendum does recognise this issue and states that the Wainhomes Phase 3 and Baxter Homes sites could be developed in tandem with appropriate pedestrian/cycle connectivity between them to address this issue).

Finally, the LHA commented that the proposed site access is not to the standards that would normally be expected, however, a suitable access (in geometry terms) could be provided which would necessitate additional loss of hedgerow giving Raikes Road a more urban appearance. In conclusion the LHA do not support the proposed addendum to the Masterplan.

Key Amendments

Many of the concerns raised during both consultation events raised matters that go to the principle of development. However, the site is allocated for development in the Local Plan and therefore the principle of development is established. However as a result of the second consultation, the proposed access from Raikes Road has not been carried forward into the final document. However as a result of the consultations a number of amendments have been made to the Masterplan to provide additional clarity of intent. Key changes are:

- A clearer road hierarchy showing principal access from Phase 1 into the rest of the allocation with phase 2 designed as a secondary access.
- Provision for pedestrian/cycle connectivity into the adjacent land held in Trust to allow public access if appropriate in the future.
- A clearer expression of the Rural Transition Zone along Raikes Road (plans and text) which will consist of lower density housing and a landscaped corridor. Specific requirement for the housing layout, design and density to respect the context of the Raikes Road frontage.
- Additional text that the objectives of the Rural Transition Zone should follow through into the land designated for education use and will also apply if said land is developed for housing.
- Additional reference to potential archaeological interest and need for a desk based assessment.
- Additional objective on the promotion of active lifestyles.
- Additional design principle establishing principal access from Lambs Road.
- Additional text to clarify that any pedestrian/cycle access to Raikes Road is a matter for consideration at detailed planning stage including a consideration of safety.
- Additional text clarifying that the primary school should include nursery provision.
- Additional text clarifying that the school should include land for car parking and a drop-off area.
- Additional text clarifying that if a new school is deemed to be unnecessary or alternative school provision is put in place by the Local Education Authority, as it is part of a residential allocation the land set aside for this use could be utilised for residential development subject to appropriate assessment of infrastructure impacts and requirements.
- Additional text clarifying that the design of the convenience store should allow for appropriate car and cycle parking.
- Additional text on how biodiversity enhancement will be achieved.
- Additional text emphasising the importance of interconnectivity including that for pedestrians and cyclists - between different development parcels.
- Additional text clarifying currently approved off-site highway works.
- Additional text clarifying that landscaping should be used to soften the impact of areas of parking including any associated with the convenience store and school.