



Community Association for the Protection of Wrea Green **Together we are Stronger!**

Update No 46
8 September – 6 October 2017

The next issue is due to be emailed on 9 November 2017

CAPOW

1.1 FBC Email Address for Objection Letters

For general information the email address to which ANY objection letters must be sent is planning@fylde.gov.uk. All emails/letters should quote the application number and address of the application.

1.2 We have another new member of CAPOW this month. We urge residents to join NOW, not to await a “problem” in your area of the Village. CAPOW is Village-wide.

2 The Villa (No SHLAA reference as this is a Commercial Development)

2.1 These Conditions/Breaches are in the hands of FBC to ensure that these are enforced. We can/do issue reminders but this does not ensure action is taken.

3 Willow Edge, Compliance with Conditions – 86 properties (Part of SHLAA reference WG14) Applications 16/0431 and 16/0909

3.1 Application 17/0743 has been submitted which deals with Affordable housing. For subsidised “affordable” purchases, we are surprised to see that, even using a 4.5 income multiplier (which seems high), the incomes required for each type respectively are almost £30,000 and £34,000. This is according to the table in the application. 2 three bed and 3 two bed discounted purchase (80% of market price) are proposed.

There are proposals for 13 two bed (two types) and 8 three bed rentable properties. Given the difficulty in allocating the 3 bedroomed affordable rentable property at the Redrow development behind Spar, we are surprised at this. CAPOW raised these two concerns with FBC Planning on 13 September.

- 3.2 The police have spoken to Story Home staff about inconsiderate parking and the bigger problem of speeding in Willow Drive.
- 3.3 A report of Story Homes commencing work at 6.45 and waking up a resident was passed to CAPOW on 5 October. The commencement time for work at this site is 8am. This matter was taken up with the FBC Development Manager on 5 October but it appears the affected resident had also reported it. An Enforcement Officer is to speak to Story Homes about this Condition breach.
- 3.4 Application 17/0468 is before the DMC on Wednesday (11 October). We were not aware of this application, which covers further advertising, including illuminated signs. Fortunately the PC has reviewed the papers, objected and the Chairman of the PC will be speaking against this application at the DMC.

4 54 Bryning Lane – 36 properties (SHLAA Reference WG 20)

- 4.1 Application 17/0797 has been posted on the FBC Planning website in relation to the discharge of Conditions. We are concerned that matters raised previously do not seem to have been addressed. As a result we re-raised those and other matters arising with FBC on 25 September suggesting that these matters need attention prior to approval of the application. This included work start/finish times, sewage matters, positioning of bus stops, traffic calming measures, road cleaning, action regarding existing on-site septic tanks under control/ownership of existing Bryning Lane residents and non-provision of speed data to gauge the size of the visibility splays required.

5 Application 17/0695 Land north of Bryning Avenue with access through land next to 38 Bryning Lane for 41 properties (SHLAA reference WG05/15).

- 5.1 LCC Flood Risk has objected to this application on the basis of the absence of an FRA (the absence of an FRA was reported in last month's CAPOW Update). Even then, LCC Flood Risk comments on the FRA for 16/1028 ignored FBC Chief Engineer's reported issues regarding Bryning Lane sewage.

5.2 On 11 September, the Parish Council again unanimously voted for the refusal of this application based on the reasons given for 16/1028. It was agreed to add some further evidence to the reasons for refusal. This was submitted to FBC Planning on 12 September. We understand from FBC that this application will NOT be decided prior to the Appeal Inquiry.

6.1 Application 17/0138 land to the rear of 91 Ribby Road – 8 properties (No SHLAA reference)

A further application (17/0753) has been submitted to identify how certain matters will be handled. This includes a proposed Construction Plan. Local residents need to be aware of the working times or to object to these. The standard working times on the Fylde for larger sites is 8am to 6pm (Monday to Friday), 8am to 1pm (Saturday) and no working on Sundays or Bank Holidays, but for this smaller site these are longer.

7.1 Applications subject to Appeal.

a) Application 16/1028 Land with access through land next to 38 Bryning Lane for 41 properties (SHLAA reference WG05/15).

b) Application 17/0005 Land at 53 Bryning Lane – 20 properties (part of SHLAA reference WG18).

c) Application - 17/0146 West of the Brooklands – 48 properties (SHLAA reference WG16)

d) Appeal against Refused Planning Permission – 16/0619 Moss Side Lane (SHLAA reference 15a) – up to 50 houses.

7.2 It has been confirmed that a conjoined inquiry will take place, possibly between February & April next year. A meeting was arranged between our Borough Councillor, the Chairman of the Parish Council, the Parish Clerk and CAPOW with The FBC Development Manager on 28 September to discuss the process, timing, involvement and activity. The results of that meeting are –

FBC are AIMING for the Inquiry to start on 13 March and to last 3 weeks (to Easter) and will be defending all 4 appeals.

Whilst there might be some movement from FBC to achieve Common Ground with developers before the Inquiry, FBC Planning confirm that they will not concede on –

The previous Inspector's comments regarding the Moss Side Lane site and 53 Bryning Lane in relation to the change of character of the Village.

Road safety issues/traffic volumes, in accordance with County Highways assessments.

Scale of development within Wrea Green.

Lack of Infrastructure improvements and relatively poor facilities - including the absence of any capacity at the Village school.

Given the FBC position, we see no additional value in applying for Rule 6 status (ie equal status with other parties' barristers). Additionally, with four appeals, this would be particularly onerous. However residents are encouraged to attend and to speak (there is NO 3 minute rule!). This includes taking issue with agreed Common Ground, if necessary, since we are not party to the Common Ground agreements. They are only between FBC and the Developers.

- 7.3 CAPOW had not been advised of the deadline of 3 October to submit **additional** comments to PINs, due to an oversight at FBC. Hence both the Parish Council and ourselves have extensions. However, the CAPOW document was ready by 25 September (having discovered the request for submissions) but was held back until after the meeting mentioned in para 7.2 above and submitted on 28 September, with some minor additions. Some residents have responded directly to PINs, as they should. The matter mentioned in 8.1 below has now also been included in our comments to PINs.

8 Brooklands Sewage Pumping Station

- 8.1 There has been another problem with the Pumping Station in that one pump was not working and the filter on the other was blocked, although the Warrington Monitoring Unit showed the pumps as running. As a result a considerable number of days' raw sewage overflowed into Wrea Brook. The engineer, fixing the fault, indicated that the system cannot cope with current pressures put on it – and that is with about 150 approved houses in the pipeline to be built/occupied (20% increase) and a further 159 at Appeal (an extra 20% increase) so an increase in foul sewage of 40% on the current situation. Previously we suggested to UU that a meter should be added to the overflow pipe to monitor how much raw effluent is discharged into Wrea Brook (to evidence the over-capacity which we know exists) – but of course nothing happened. UU still do NOT raise this over-capacity when responding to planning applications. We have suggested to the Parish Council that this matter is taken up with the Environment Agency (EA) as Wrea Brook, to the west of Station Road is regarded as a “main river” and pollution of a main river is an EA matter. However the FBC Development Manager undertook (28 September) to check to see if

the EA have been advised. FBC Planning have now also contacted UU for their re-assessment of sewage issues prior to the Inquiries. This problem has been added to our response to PINs mentioned in 7.3 above as it provides further evidence of issues with our Village infrastructure and capacities. This also evidences the need for local residents to be alert and to report problems encountered.

9 Local Plan Examination (LP32E)

- 9.1 We were been provided with copies of the LP32 consultation comments from three other sources. All are critical of the Local Plan, the assumptions made and the supposed housing need. This follows the same pattern as the CAPOW submission, although these have a wider spectrum generally. However, whether any notice will be taken of these comments is very questionable given the Government push for growth! All responses to the re-consultation were made available on the Local Plan Inquiry website in late September at <http://www.fylde.gov.uk/council/planning-policy--local-plan/local-development-framework/www-fylde-gov-uk-examination/>.

It is both surprising and disappointing that not one individual from Wrea Green seems to have made any representation, not least in support of the CAPOW and Parish Council's submissions. This MAY affect the forthcoming 4 Appeals, although none of those sites is contained in the CURRENT plan! In contrast, there were MANY submissions from Elswick, particularly in relation to its Tier 2 status, which is under challenge by Developers.

A total of 1488 pages of submissions were received for this re-consultation, which we have now scan read looking for any new key data relating to Wrea Green but found none. As expected, Developers are making much of the fact that the current supply of housing land, deliverable within 5 years, is just 5.1 years by housing volume and therefore likely to be insufficient based on a 415pa OAN. Developers (but not necessarily builders) are therefore still seeking more and more allocations of land for development. FBC are reviewing their position in advance of a Public Inquiry in St Annes, due in October.

FBC are expected to provide their summary and deliberations on submissions in October.

- 9.2 We understand that there is to be a Stage 3 of the Local Plan examination, probably in December, and it is clear that the Local Plan will not be approved and implemented this year (almost another year gone and it will be 7 years since an updated Local Plan was due and before it is implemented).

- 9.3 The document mentioned under 10.1 is critical of the costs and effort in employing consultants, with inconsistent and different methods of calculation and differing from those used by developers, to identify the REAL housing need. All this is costly, time consuming and lacks transparency. The current process leaves substantial room for interpretation. All this is apparent from LP32E and the volume of appeals, in general, on the Fylde. The Government says it wants to give local communities greater control over development in their area. However it does not define “local communities”! It suggests that the affordability of houses is the best evidence in adequacy of supply, but does not mention the cost of land or developers’ costs/profits or varying costs in different locations.

10 Government Consultation on “Planning for the right homes in the right places”

- 10.1 As part of CAPOW links with CoVoP (Community Voice on Planning) we were asked to take part in the above consultation on proposals issued by the Department for Communities and Local Government. The consultation document is 42 pages containing narrative followed by questions to gauge opinions, plus 17 pages of questionnaire pro-formas. However, we have concern about a number of the assumptions contained within the narrative, which appear as fact but are not! Again we have a “one solution fits all” scenario. CAPOW will be responding to this consultation in due course. Using the new proposed method of calculating the OAHN (Objectively Assessed Housing Need), CPRE calculate an indicative figure for the Fylde of 296pa. However, there is a maximum addition of UP to 40%, which gives 414 (the Fylde OAHN is currently 415, although Developers are trying to push it higher).

11 Technical Consultation on Local Government Finance Settlement 2018/19 (from the same source)

- 11.1 From our perspective, the main issue is the New Homes Bonus (NHB) on which FBC is heavily reliant to maintain current Council Tax levels. However, this is not a matter for CAPOW’s direct involvement albeit we do see a conflict between NHB and a real need for development rather than, what seems to many, a supposed inflated need. The latter is affecting communities, like our own, very negatively.

Summary of Outstanding/Ongoing Matters

At DMC level – (please note we have to work for information on the Planning website to use as “a best guess” as to when an application will come before the DMC, UNLESS the Agenda has been issued or other information happens to be provided. This explains why some applications may not come forwarded as

anticipated below. The basis of our “best guess” is linked to the requirement to consider an application within the proscribed time limit of 3 months).

Awaited/Expected –

PINs Appeals (possibly February or April 2018)

Non-determination by FBC Planning

- a) Application 16/1028 for 41 houses, west of Bryning Lane (41 houses)
- b) Application 17/0005 land Adjacent to 53 Bryning Lane – under Appeal for non-determination by FBC (ONLY 20 large detached houses).
- c) Application 17/0146 land west of The Brooklands (48 houses).

and

Appeal against decision to Refuse

Application 16/0619 Moss Side Lane (up to 50 houses).

Current –

Application 17/0695 Land adjacent to 38 Bryning Lane – still 41 dwellings (repeated application to the Appeal under 16/1028).

Other Issues –

Monitoring of compliance with Construction Plan Conditions and other matters at Ricksby Grange and Willows Edge (all on going), to which 54 Bryning Lane will be added when work commences (eventually). This is very dependent on site-local input from residents.

John Rowson

Chairman of the Community Association for the Protection of Wrea Green

6 October 2017