



Fylde Borough Council
Development Control
The Town Hall
Lytham St. Annes
FY8 1LW

For the attention of Mr Mike Atherton

7th January 2014

Fylde District Group is part of the Lancashire Branch of the Campaign to Protect Rural England (CPRE), a company limited by guarantee.

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CPRE Planning Representation

Planning Application 13/0655 for a mixed sporting and commercial development Mill Farm, Fleetwood Road, Medlar-with-Wesham

CPRE Fylde District Group objects to this planning application. Our grounds for objection cover:

1. Conflict with planning policy for development in the countryside
2. Proposed allocation in the Local Plan Preferred Options
3. Environmental impact and the need for an Environmental Impact Assessment
4. Ensuring viability of town centres: need for a Town Centres Impact Assessment
5. Access and traffic congestion
6. Sustainability
7. Loss of agricultural land

These are detailed in the following sections.

1. Conflict with Planning Policy for Development in the Countryside

The site is outside any settlement in a semi-rural area and on land designated in the current Adopted Local Plan (the Local Plan) as Countryside Area. The proposal is therefore contrary to Policy SP2 of that plan because it fails to meet any of the acceptable exceptions regarding development in such areas.

We also consider the application fails to meet the NPPF Para. 28 which states rural development should '*promote the development and diversification of agricultural and other land-based rural businesses.*' Although other aspects raised in Para. 28 do support unspecified development in rural areas in our opinion this development is completely at variance with rural based activities, consequently we consider the policy aspect quoted as being most relevant.

2. Proposed Allocation in the Local Plan Preferred Options

The Local Plan runs until 2016 and will be replaced by the forthcoming Local Plan which will run until 2030. Proposals are emerging for the forthcoming Local Plan where in the published Local Plan to 2030: Part 1 Preferred Options (June 2013) Policy SL4 indicates possible allocation of a 4 Ha site E4 for 'employment and leisure'. But no evidence of need for leisure is given and no policy is proposed for classes of leisure in such a Countryside Area. CPRE highlighted these deficiencies in our Consultation Response (*Reference 1*).

The area of the Mill Farm development site is given in the application as 12.6 Ha which clearly conflicts with the proposed allocation in the Preferred Options.

The site was first shown as a potential employment site in the Employment Land and Premises Study (*Reference 2*). The Study correctly identifies potential greenfield employment land allocations around Wesham as 'complex' having considerable environmental and access issues. (*Para 11.51*).

In fact in our Preferred Options Consultation Response we found the Study unsound with respect to the amount of employment land required to be allocated. We believe that taking the Warton Enterprise Zone properly into account, together with the range of predictions and historical evidence in the Study, the Council will need less land than is currently designated as employment land. Thus the release of further land for commercial use at Mill Farm is premature.

However, overriding all this, it must also be remembered that public responses to the forthcoming plan and also the published Preferred Options have not been considered by the Full Council. and have not been subject to examination in public. They therefore cannot carry much, if any, weight.

3. Environmental Impact and the Need for an Environmental Impact Assessment

The Planning Statement states that the Council has produced a Screening Opinion confirming that an Environmental Impact Assessment (EIA) is not required (*Reference 3, Para 1.8*). However, for the reasons below, in the opinion of CPRE a formal EIA must be provided.

We note that this development covers a range of businesses collected together to form a business park with a total area of 12.6 Ha and with a stated floor area of over 28,000 m². In addition, the stadium main stand would be over 80 m long and about 20 m high and other buildings proposed would be of comparable dimensions. Without doubt the development would be highly obtrusive in this semi-rural location. In this respect it would be contrary to Local Plan Policy EP10 which seeks to avoid adverse impact on landscape character.

Traffic

The traffic generated by the retail and commercial businesses proposed would be on a level to be expected with a sizable business park, but added to this with up to 6,000 spectators using the stadium when matches are on, so the impact of the traffic on the area would be immense. In addition, the associated parking would spill over into the surrounding roads causing added congestion problems. This all constitutes potentially massive environmental impact.

Also in connection with traffic we note that the Highways Agency require a 10-year assessment of traffic levels before approval. But we are concerned that in their response most weight is given to possible problems at the M55 junction and consider that exacerbation of problems already evident on the A585 with current traffic levels are given insufficient weight.

Sewerage

We note that a self contained effluent system is proposed for the site but also that the Environment Agency has expressed dissatisfaction with the proposals regarding flooding. This is another aspect that underlines significant environmental impact that could arise from the proposed development.

Light pollution

Little if anything is mentioned in the proposal about lighting for the various elements of the development. Not only would general lighting for access to all the units be required but the stadium and the floodlit pitch will require floodlighting. Of necessity this will be mounted on high masts and will be extremely powerful. Even carefully designed lighting to Institution of Lighting Professionals (ILP) recommendations would still result in a site that is highly obtrusive after dark. No details are given by the applicant regarding lighting but any lighting, including internally illuminated advertisements, that do not meet ILP recommendations would be in conflict with Policy EP 28 of the Local Plan.

Noise pollution

The stadium and probably other sports facilities will use open air public address systems. This has been the case at the current AFC Fylde football ground close to Warton and the noise resulting from it can be heard over large parts of Warton and also Wrea Green. Thus the present stadium with its PA system does not meet Policy EP 27 of the Local Plan therefore creating a larger stadium and possibly other sports facilities with PA systems could certainly impact adversely regarding noise pollution on this rural area and are likely to be contrary to EP 27 of the Local Plan.

Advertisements

The site is within the Area of Special Control of Advertisements (ASCA). No mention is made of the multiplicity of adverts which would arise as a result of the various commercial and sporting units on such a development. These would have a significant adverse impact in an otherwise rural area. In particular, by their nature, any internally illuminated advertisements that might arise would be contrary to Local Plan Policy EP28.

Loss of woodland

4.7 Ha of the site is a woodland plantation which we understand is now designated as a forest. The development would obliterate a significant area of this woodland which would be to the detriment of the local area and contrary to Local Plan Policy EP12.

With all these aspects of impact on the environment to be expected from the development it must be asked why a comprehensive EIA has not been provided with the application.

Environmental impact assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The draft National Planning Practice Guidance (NPPG) sets thresholds for when an EIA is required. Types of urbanising development where one might be required are set out in the Annex, Schedule 2, Section 10b. The types of development listed are shopping centres, car parks, sports stadiums, leisure centres, etc., which therefore include the types of development in the present application. Nominally, that list relates to urban developments but rural sites are clearly covered since urbanising effects in previously non-urbanised areas, i.e. rural areas, are one of the factors considered.

Further, the NPPG indicates that an EIA, which should consider amongst other things the

physical scale of such developments, potential increase in traffic, emissions and noise, is likely to be required when:

- The area of the development exceeds 0.5 hectare (in this case it is 12.6 Ha).
- The development is on a significantly greater scale than the previous use (There are presently virtually no built developments).
- The types of impact are of a markedly different nature (There is nothing remotely like the proposed developments present in the area).
- The site has not previously been intensively developed.
- It would provide a total of more than 10,000 m² of new commercial floor space (in fact it is over 28,000 m²).
- The development would have significant urbanising effects in a previously non-urbanised area (The site is currently in a semi-rural area).

Clearly, all the factors to be considered when deciding if an EIA is required are met in this case. Thus CPRE Fylde District Group is convinced that one should be provided before this application is considered by Committee.

4. Ensuring Viability of Town centres: need for a Town Centres Impact Assessment

Clearly the policies in NPPF Section 2: *Ensuring the vitality of town centres* apply to this proposed 'out of town' development.

Impact assessment

Paragraph 26 of the NPPF states: *When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). This should include assessment of:*

the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

The proposed development meets all these criteria, consequently, in the opinion of CPRE, a Town Centres Impact Assessment must be provided, with impact assessed over 10 years.

Sequential test

Para. 24 of the NPPF states: *Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.*

Although the stadium and other sporting facilities would not be appropriate as main town centre developments other elements of the scheme are, in particular the retail shopping outlets, pub and restaurants, hotel, etc..

The application fails to show that a sequential test has been carried out for each element of the proposal. Without such a process vacant sites or sites suitable for re-development that exist in the towns of Kirkham and Wesham might be left undeveloped and trade could be moved further from the centres. This would be contrary to policy.

5. Access and Traffic Congestion

We are extremely concerned about access to this site. The A585 is currently heavily congested at peak times with traffic queuing back from the M55 junction as far as the roundabout to the south of the proposed site, and beyond.

Inevitably most people would access this proposed development by car, not only because it is some distance from Wesham but also because it will attract people from much further afield. Adding more retail, business and leisure traffic to the existing levels would compound existing problems but they would be increased greatly when matches are held at the proposed stadium. The surges of traffic at the start and the end of games would make congestion immeasurably worse.

The lack of adequate on-site parking to cater for matches at the stadium would also exacerbate congestion problems. We understand that in total 353 parking spaces are planned, which we consider hopelessly insufficient. They might cope with the customer and employee needs of the associated business/retail park but when a match is on at the stadium we foresee cars parked along roads all around the area, which would compound the traffic flow problems.

A further drawback to the existing scheme is that the one and only access point is from the roundabout at the southern end of the site. Therefore traffic coming off the M55 has to travel past the site and then compete with all the traffic coming from the south.

It is also important to note that the proposed site is, to a great extent, cut off from Wesham by the A585 making access on foot difficult and access by bicycle problematical because of the need to cross a busy main road. So the site would not be well positioned to integrate with Wesham and would be a distinct out of town development.

An additional concern with added traffic congestion is that ambulance and fire services are based close to the site and quick response to emergencies could be compromised by congestion associated with this development.

6. Sustainability

Our concerns regarding the sustainability of this proposed development hinge on its location and the area of its likely user base.

Because of the problems of access described above the location of this site has considerable drawbacks from the point of view of sustainability. In particular we note that the stadium is not well located. It may be close to the M55 junction but the club's principal supporter base is centred in the Borough of Fylde, ie. south of Kirkham and closer to Lytham and St. Annes. Thus much traffic would have to travel past or through Kirkham and Wesham to get to the ground. By comparison we anticipate supporter levels from Blackpool or for visiting teams, which would probably use the M55, would be at a lower level.

We also question the viability of the other sporting areas/facilities because we are informed that the principal schools in the area have already developed sporting facilities to meet their own needs and these are available to the wider community. Without a need for

schools to use them such facilities on this site would be under-utilised and unsustainable.

The sustainability of other proposed amenities must also be questioned because there is duplication with existing facilities in the area, for example restaurants, pubs, a hotel and petrol station.

7. Loss of agricultural land

We accept the agricultural land survey provided by the applicant (*Reference 4*) which concludes that 3.4 Ha of the site is Grade 3a and 5.3 Ha is Grade 3b agricultural land. The remaining 4.7 Ha is woodland.

Development of the site as proposed would conflict with planning policy as follows:

- The NPPF sets out the Government's aims for sustainable development, requiring effective use of natural resources.
- The NPPF recommends effective use of land, which we interpret as using brownfield sites for development before greenfield sites, so reducing loss of agricultural land.
- Local Plan Policy EP22: *Protection of Agricultural Land*, seeks to prevent development that would involve permanent loss of agricultural land graded 1, 2 and 3a.

Agricultural land needs to be preserved not only for local food production but there is now an increasing need to supply on-farm anaerobic digester power plants in the Borough. These digesters rely on arable crops as the biomass feed material, and for greater sustainability and benefit to Fylde's rural economy these should be locally sourced. One anaerobic digester power plant is now in operation in Warton and further plants are proposed. So there is, in fact, an increasing need for agricultural land in the Borough.

Conclusion

We trust you will give all these factors we have raised due consideration and recommend refusal of this application.

D. H. Moore

Planning Officer

John Westmoreland

Secretary

REFERENCES

1. Fylde Local Plan to 2030: Part 1 Preferred Options. CPRE Consultation Response. 22-Aug-13
2. FBC Employment Land & Premises Study. Final Report. AECOM/BE. August 2012.
3. Mill Farm Sports Village. Planning Statement. PWA. Oct 2013
4. Mill Farm Sports Village. Agricultural Land Classification & Soil Assessment. RAC. Oct 2013