

18th March 2010

Marton Moss: Urgent New Developments March 2010

We have corresponded previously and I have tried to keep you informed about the twists and turns over the past 12 months of the proposals for substantial house-building on Marton Moss. I have shared the anxiety and opposition of so many people over this. **Now there have been dramatic and worrying developments in the past week.** Firstly Blackpool Council and its ruling executive have endorsed their Draft Preferred Option for its Future Core Development Strategy. This confirms they now want to drive ahead with a mass house-building programme on the Moss over the next fifteen years - pending public consultation.

Second, despite the fact that consultation has not yet taken place, Blackpool Council seem to want to rush ahead with a first phase. **They've brought back Kensington Development's second application (09/0740) to build some 584 homes now off Moss House Road to a special Planning (Development Control) meeting at 5pm Thursday March 25th and the officers' report has recommended the committee to approve it.** (This has been in abeyance since the Government put a block on it last autumn). They will be considering alongside it a separate application to build on land at Runnell Farm, Chapel Road (09/1511). I have written to the Council previously opposing both applications.

Draft Core Strategy and Kensington's Plans to Build on the Moss

It's now very clear that the Council's **recommendation to push through approval of Kensington's plans is being justified by a yet unapproved core strategy.** That Draft Strategy for the next 15 years in Blackpool runs to some 170 pages: I have looked carefully at the sections dealing with their regeneration, homes and development strategy - especially those sections dealing with their proposals for Marton Moss. If implemented in their current form they would replace the current Local Plan which currently protects the Moss from over-development.

I think people need to be very concerned that **there has been no substantial change in the plans since originally published last summer.** This is despite the concerns so many people have raised about them. These include the threat of suburban sprawl, the destruction of the Moss' semi-rural character, the need to increase focus on inner Blackpool regeneration, the failure to identify a skills and employment strategy to go with any major planned new homes area and the threat to existing infrastructure, water table and other problems. **Despite all this the plans still call for some 2,700 new homes across Marton Moss by 2026 - 500 in the next five years. That's the first instalment which the Council now propose to drive through using the Kensington application.**

The sections of the strategy justifying the plans are full of vague assertions. **They've ignored opportunities to look at alternatives** pointed out by the 'Save the Moss' campaign and others. There are claims that (p30-31 of Draft Core Strategy) 'Edge of Blackpool' development would increase choice of affordable family houses and low cost home ownership - but no evidence is produced. However it's admitted that 'the precise alignment of the pace of regeneration in Central Blackpool and new housing growth on the edge of Blackpool may not be possible.' **That is a recipe for disaster - sprawl on the edge with unsold properties with no ambitious alternative strategy** to extensively use brown field and a strategy to tie in housing with skills and employment to revive the town centre.

The sections on 'quality', 'landscape, and 'biodiversity' in the Council's strategy are hedged with qualifications such as 'as far as is predictable' (p36) These would permit the undercutting of the 'green infrastructure' which it claims it wants to protect. We are told that 'no decisions have currently been taken by Fylde Council to determine the scale and direction of development in its local authority area.' (p89). This begs the questions **why Blackpool should be expected to sacrifice a major semi-rural area like the Moss lands** - which the strategy admits (p101) '**will substantially change character with the new housing areas and become more suburban.** The whole spatial strategy on which these proposals are based is supported to work across borough boundaries.

There are vague and waffly references to new green 'elements' which will 'creatively absorb development' are no substitute for proper cast-iron safeguards over the massive number of homes proposed. There has been no attempt to explore alternatives such as to develop eco-businesses, green tourism and other options to regenerate the Moss area campaigners have proposed. Yet **the Executive of the Council rubber-stamped this document at its meeting earlier this month without any detailed discussion.** And now we know that the Council are pushing for Kensington's Moss House Road development to start as its first instalment

Runnell Farm and the Council's inconsistencies

Also at the meeting on March 25th is the Runnell Farm Planning Application on which I submitted my opposition and concerns to the council before Christmas. These **included worries about viability of drainage and highway maintenance from United Utilities and the failure of the applicant to produce proper documentation about vehicle impact.**

Many of the overall concerns are the same as those opposing to the Moss House proposals. That's what makes it so bizarre that the recommendation is to approve the Moss House Road development and refuse the Runnell Farm one. **It points to complete inconsistency in the Council's position.**

On the second Kensington application, I said as long ago as last July when I formally put in my opposition, joining Save the Moss campaigners with their 700+ petition at the Town Hall that 'the reduction of the target number of homes from 640 to 570 appears to be essentially a cosmetic exercise.' **The arguments against the second Kensington application are substantially those against the Council's core strategy proposals for the Moss.** These include environmental and flood risks and the failure properly to maximise reuse of brownfield sites or incorporate proper low carbon targets in the buildings planned. (I would be happy to forward a full copy of the detailed objection I made at the time if you would like to contact me.)

Following representations the Government and the **Secretary of State wrote to the Council last September effectively blocking Blackpool Council from granting permission to the Kensington application under Article 14 of the 1995 Town and County Planning Act without referring it back to ministers.** That underlined the size and sensitivity of the proposals and the strength of the opposition to it. It also of course followed the revelations in August about the two £5000 donations made by Kensington to the Blackpool South Conservative Association **which inevitably raised questions about how impartial that party's councillors could be seen in making decisions about it.** Since then of course **one of those councillors has been censured by the Standards Board for England** who found him guilty of '*failing to declare a personal interest contrary to paragraph 9(1) of the code of conduct*' and whom also noted that due to the donations, he had '*an ongoing relationship*' with the directors of the company. (The Councillor has said he will appeal)

In November I obtained a special debate in Parliament on the whole issue of Marton Moss. I pointed out then that the Council were solely responsible for the balance of where they built on the back of the Regional Spatial Strategy; I outlined the need for the Council to 'engage positively with an alternative agenda to their obsession with building on the periphery.' The Housing Minister who responded to me in the debate emphasised that the **Council could not use growth point strategy simply as an excuse for large-scale development on the Moss.** He agreed it was the Council's

responsibility on how to meet the requirement for additional housing but 'the Government had made it clear to local planning authorities that they should use previously developed land first.'

Flaws and Admissions in the Recommendations to Build

I have now looked through in detail the 28-page report on the Kensington\Moss House Road development the Council have sent to the Development Control (Planning) committee members for next Thursday 25th March recommending they approve the 584 houses and associated developments. (The Application Reference is 09\0740 and the full report can be seen on the Council's website now.)

The arguments for approval are based on assertion not evidence. They are often inconsistent. The whole tone and justification for approval shows **an almost cynical disregard for consultation and listening to the concerns of local people.** They ride roughshod over accepted conventions as to how planning agreements proceed and give the green light to the developers, even though it's admitted they have failed to fulfil key requirements that are expected and were asked for in this very large-scale development.

The report lists objections to the Kensington application from Sport England and the Council for the Protection of Rural England, and deep concerns from United Utilities about drainage, from Lancashire County Council's Ecology unit, from Blackpool Transport and from the Government's Environmental Affairs Department. It then, in effect, ignores them.

In its attempts to justify why the Council are recommending approval of a plan they refused in principle 9 months ago, the report airbrushes away the demands for a proper and full consultation of people on and near the Moss by saying that the two outline planning applications themselves constituted this. This is completely misleading and dismissive of the need to address people's concerns which now seem all too justified. **The Report also admits elsewhere that it is 'recognised' the application is being considered prior to consultation on the preferred option for Core Strategy.**

A Terrible Deal for Residents and Council Tax Payers

The 'deal', for that is what it is - represents a proposed set of agreements between the Council and the developers which has **clearly been the result of long detailed discussions between them away from the public's eyes.** It falls far short of anything that would justify it as a contribution to the sustainable principles in Government policies that the Council is supposed to live up to. The report admits the Development will not meet targets for a mixed development that it won't meet properly demands for open space. It will evade elements of the existing Local Plan and the Government's clear guidelines to prioritise and make use of brownfield sites. It now seems clear incidentally why it took a Freedom of Information request from Save the Moss residents to finally get these points out in the open after weeks of delay.

The report admits that **60% of large trees and 20% of young trees would have to be removed** in the development area. It tries to brush over the concern about lack of school places by saying that the redevelopment of Highfield College under the Government funded Building Schools for the Future, 'could be considered as part of this process'. In fact all the funding and plans for this are entirely separate and unrelated to it.

Having admitted all those defects in the proposals the Council tries to justify its position saying they have got a section 106 agreement, essentially 'compensation' from the developers for their failure to meet the targets discussed. **None of the money coming from this would automatically benefit people on or near the Moss.** The biggest amount should be based on a 30% requirement, £21.9million for affordable housing provision elsewhere. **In fact the Council are proposing to accept a bargain basement offer of only £9.2million from the developers.** What may be worse is that the fine print of the agreement suggests Kensington might not have to put up even a first instalment of this sum for years, even once they have started building and selling(if they can) the proposed houses.

Contradictions and Failure to Consult

The most depressing aspect of this Report is its recommendation that despite contradicting the current Local Plan, and despite the Draft Core Strategy not having been consulted with people or even adopted, the application should be approved. In the words of the conclusion, 'it is recognised the application is being considered prior to consultation on the preferred option for core strategy... it is not felt that an argument on prematuring grounds could be sustained.'

That tortuous language seems to conceal an ugly reality. It is a bit like Alice in Wonderland, verdict first, trial afterwards. It is in effect saying, 'we want to do this before people have been properly consulted and ignoring the current Local Plan which nine months ago were justification for us recommending refusal.' There's no attempt to justify that complete turnaround, there is no justification. The procedures suggested are flimsy and novel. They are outrageous and may yet be seen to exceed the Council's legitimate powers. They certainly are in my view an abuse of the responsibility properly to consult or respect residents views to do a deal with developers in their haste whose actions, including last summer's political donations while this planning process was going on, have proved hugely controversial.

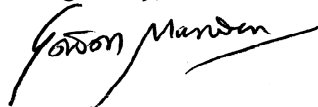
You Need To Act Now

This latest alarming episode underlines how vital continued vigilance and focus is to preserve your local environment and make sure there is viable future for residents on and near the Moss.

- 1) **Making your views known now on the Kensington Application.** Support local residents and 'Save the Moss' campaigners by writing to or emailing the Chief Planning office ASAP or **attending the Town Hall for the Development Committee at 5pm on March 25th**. Also you could reiterate your opposition and ask questions of the Council's Executive and your local councillors
- 2) Questioning those sections of the Core Strategy about the Moss I've referred to. **Demanding a full and proper consultation in the area with those affected** - which has still not, despite several requests from me and others, taken place - and calling for alternative scenarios in it.
- 3) **Letting me have your specific views, comments either by post or email to me as soon as possible so I can feed these in too.**

I remain resolute and consistent as I have over the last 18 months in opposing the over-development on the Moss and to representing the views of residents opposed to it - as underlined by the 400 people who contacted me last spring, the 150 who attended the Highfield School meeting, at which I spoke and the 700-plus who have signed the petition against Kensington's second application.

These are issues over and beyond the effects on the quality of life for people living on or near the Moss. They are about getting the balance right with a Core Strategy that looks at far more housing and regeneration in the centre of Blackpool and not suburban sprawl on its edge. And at doing that thoughtfully, not with a flimsy, mad-dash application entrenching people's suspicions.



Gordon Marsden MP

P.S - There are previous updates and information about my work on the Moss on my website - www.gordonmarsden.co.uk, Save the Moss' campaign group website is www.saveourmoss.com
The Council's Draft Core Strategy can be viewed at <http://tinyurl.com/ydo9ep1>