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Councillor Peter Callow Esq
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Wednesday 15th July 2009

Dear Peter,

Proposals for Revised Core Strategy - Marton Moss

I am writing to you to express my grave concerns and scepticism about the report which you and your Cabinet Executive have had submitted to you for your information.

I have read carefully both the summary Executive Report prepared for your meeting on 15th July and also the detailed Core Strategy paper produced to support it. I have to say that it seems to me deeply flawed and an inaccurate projection of both Blackpool's likely needs and external requirements.

I say this both on the basis that it provides little evidence of any fresh thinking or analysis since the Council meeting of March 11th, which following Councillor Fred Jackson's original motion (subsequently amended) which required a comprehensive second look at both the future of the Moss and at brownfield housing supply elsewhere. But also the argument underlying the new report seems skewed to reinforce the existing direction of travel rather than any genuine attempt to look at alternatives to the original assumptions.

Let me give you some examples, quoting specifically from the Report and Core Strategy you are having proposed for approval.

Flawed Figures for Number of Homes Needed

1. In the section on Blackpool's Housing Requirement it is stated that the North-West Regional Spatial Strategy projection for homes needed in Blackpool from 2003-2021 is 8,000 homes. Then there is a sudden change of goalposts with the vague phrase "the time horizon for the Core Strategy is required to look to 2026" and a projection that this additional 5 years of housing would require an additional 2,200 - making a total requirement of 10,200 up to 2026.

Objective observers might say that this was at best sloppy thinking and at worst sleight of hand. If you take the period on which the Regional Spatial Strategy is based (2003 - 2021) the outstanding net requirement for new sites for development is around 5,000 homes **not** the 7,200 the Report says.

And if you follow this arithmetic through the rest of your report - to the section on outstanding requirement for green field development - the figure of new homes required for the land between Yeadon Way and Progress Way and School Road would **not** be 2,700 new homes but around 500.

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Lack of Proper Inner Area Regeneration Bid

2. This incidentally assumes that the rest of the comments - because that is all they are - about the lack of potential for brownfield development and the alleged pressures from planning inspectors is accurate. Again, that is highly questionable. The Report says that the chances of the Council securing a Government commitment to a long-term programme of financial support for increased inner area intervention must be “considered extremely slim”. But the report has made no attempt to identify a programme on the £350 million you have said might do this (figures incidentally which are also poorly substantiated). So it appears to have given up on that strategy before you start.

Potential for raising Blackpool’s Share

3. The report makes no attempt to suggest whether Blackpool’s share of the overall growth point bid in terms of number of new homes might be negotiated downwards in consultation with West Lancashire Council, which would affect the targets. I assume therefore the council has made no attempt to discuss this with them or government.

Lack of a green issue context to strategy

4. The report is supposed to be looking at a period of time up to 2026, though the requirements on which the regional strategy is based goes as I have said only to 2021. It attempts to bulldoze the argument for Greenfield building through with words like ‘high risk’ of government inspectors directing the council to allocate sites put forward by the house building industry! Yet nowhere in the report has any account been taken of the new environmental and low carbon requirements that central government is already going to demand of new housing strategies, let alone likely new proposals.

The threat of suburban sprawl on Blackpool’s green edge

5. What is clearly admitted in this report (and I quote) is that ‘it would be misleading to claim that the developed Moss lands would not change in character... they would become more suburban than semi rural.’ Indeed they would with 2,700 new homes planned, 500 of them suggested on the Moss House Road site, a figure suspiciously similar to the 570 suggested in Kensington’s second planning application, which also has no environmental of low carbon targets for the homes suggested built into it. But people are supposed to be reassured that it would not be suburban sprawl because of a collection of vague phrases about ‘an organic approach to development’ and ‘gateways characterised by wood land and water.’

What is very clear from the details of the DLA proposals incorporated in this report is that it would be the residents of Fylde who might get the woodland and water, while it would be the residents of Blackpool who would get the

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lion's share of the housing development, in our only remaining large undeveloped Greenfield area, the Moss, which would become suburban.

Perhaps this is why you were quoted in the Gazette report on the new core strategy and the DLA proposals as saying 'it will protect the beautiful villages in rural Fylde and prevent us from having to build there.' This will be little comfort to either the residents currently on or near the Moss who would see their green spaces disappear or the people of Blackpool as a whole who would see their enjoyment of them and the chances of dynamic inner town centre regeneration totally hampered by the Council's failure to think imaginatively about alternatives.

Core Strategy Does Not Address Services and Employment Issues

6. Others including these concerned specifically about the future of the Moss have already pointed out to you that the core strategy says virtually nothing about the pressure on existing facilities and resources that the proposals for a 'Fylde Village' would bring, nor does it address employment opportunities. The objections to the Kensington applications, including your own officials, have made the point about these issues as well. Any genuinely thoughtful review, which was what this was asked to be, would have addressed issues such as revival of allotments, eco-tourism, nature reserve that might bring new employment to the Moss and Blackpool's outskirts. Instead I am afraid what we get on this issue in the paper you have raised is largely buzz words and waffle.

Conclusion

If you and your colleagues want to demonstrate a serious and thoughtful commitment to both inner area regeneration and green issues, you must recognise this strategy is an inadequate response on both fronts. There is no commitment in it to detailed public consultation - nor was there any involved in the revision to it between March and July - despite my asking you specifically for this when I wrote to you following the Council debate and motion in March.

If you simply endorse this Strategy without sending it back for major revision and consultation, people may perfectly reasonably draw the conclusion that the Cabinet and your executive are not serious about those commitments. That would be a matter for regret - not least because we should all be trying to work together to put coherent and sustainable arguments for housing regeneration to Government.

Yours sincerely,

Gordon Marsden MP