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Consultation Statement: Regulation 19 Pre-Submission Plan

Reaper Limited and Hulton Land Ltd

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1 INTRODUCTION

- 1.1 This Consultation Statement (CS) is written on behalf of Reaper Limited and Hulton Land Ltd (R&HL) in response to the Regulation 19 Consultation on the emerging Central Lancashire Local Plan (eLP).
- 1.2 R&HL have an interest in land off Longridge Road, Grimsargh¹, which forms part of an Area of Separation (AoS) on the Policies Map. It is considered that the AoS designation, in its entirety, is not justifiable and as such the eLP is not sound. Furthermore, it is considered that the site should be allocated for residential development with associated public open space (POS), including junior football pitch, and a Biodiversity Net Gain (BNG) Habitat Bank.
- 1.3 R&HL and Edgeplan would welcome the opportunity to discuss this matter with the Policy Officers prior to submission of the eLP and intend to participate in the eLP Hearing sessions.

¹ Appendix 1: Location Plan

2 LAND OFF LONGRIDGE ROAD, GRIMSARGH

The Site and its Setting

- 2.1 The site is some 11.39ha in extent and is greenfield land that is sporadically used for grazing purposes.



Image 1: Location plan

- 2.2 The site is bound by residential development to the north and south. Longridge Road forms the site's eastern boundary, with further residential development on the opposite side of the road for the majority of the site boundary. A former railway line dissects the site to the west, with open countryside beyond.
- 2.3 As a result of its urban setting, the site is locationally sustainable. It is within close proximity to the services and facilities on offer in Grimsargh to the north as well as the employment and other associated uses to the south. Regular bus services run along Longridge Road, providing easy connections to the wider area.

Planning History

- 2.4 The site has been the subject of two planning appeals. The first appeal (218235) was for a scheme of 143 dwellings and the second (2201821) was for a scheme of up to 100 dwellings. Both were dismissed. The Inspector for appeal 2201821 concluded that *"the harm which would be caused to the objective of maintaining an effective Area of Separation between Grimsargh and Preston outweighs the significant benefit of providing both market and affordable housing and the other benefits identified"* (para. 27, 2201821). However, neither Inspectors ruled out the potential for development to take place at the site.

Development Potential

- 2.5 Full consideration has been given to the previous appeal decisions when reviewing the potential for development at this site. Furthermore, Influence has provided a Landscape and Visual Statement² (LVS) which has ensured that the development proposal is landscape-led.
- 2.6 The LVS has shown that there is potential for the southernmost part of the site to be developed for housing, c. 90 dwellings, and for the AoS to be strengthened via associated structured landscaping and a BNG Habitat Bank. This approach is illustrated in the Concept Plan³ produced by The Urbanists (extracted overleaf).
- 2.7 Existing hedgerows will be retained throughout with significant structured tree planting proposed throughout the site and in particular, north of the developable area. Such planting could include a community orchard and would, when established, effectively screen views of built development from Longridge Road and the PRow network.

² Appendix 2: LVS

³ Appendix 3: Concept Plan



- 01 Indicative access into the site capitalising on existing public transport infrastructure providing direct access to existing bus stops along Longridge Rd.
- 02 Retained ponds within feature green spaces contributing to habitat creation.
- 03 5m offsets from hedges maximise the potential for existing hedgerows to continue to support local ecology and wildlife as well as accommodate pedestrian links to aid permeability across the site.
- 04 Combination of provision of a central green space, green streets and highly permeable active travel network creates an environment that is attractive and user friendly rather than dominated by vehicle movement and parking.
- 05 Enhanced landscaping along green corridors within the development with new tree and hedgerow planting, softening views toward the site reinforcing the area of separation.
- 06 Majority of homes will have positive outlooks of green spaces supporting health and wellbeing, and provides natural surveillance over public open spaces and pedestrian links.
- 07 Active travel path extension along disused railway with links into the site.
- 08 Primary street incorporate green verges to facilitate street trees and potential rain gardens to support the SUDs strategy and reinforce the street hierarchy.
- 09 Low density and fragmented urban fabric along northern edge to minimise visual extent of built form.
- 10 Existing green infrastructure through the site have been retained and fronted onto and streets oriented to punctuate views onto retained trees to capitalise on and celebrate green assets.
- 11 Centrally located formal play provision in close proximity to potential pedestrian access to The Hills area to the south.
- 12 Indicative 1km trim trail and pockets of outdoor exercise equipment.
- 13 Indicative pedestrian paths providing access to green space and wider PROW network.
- 14 Potential pedestrian access to The Hills.
- 15 Layout incorporates layered landscaping that captures ecological, social, and aesthetic benefits, including 3.3ha of potential habitat bank.
- 16 New/relocated war memorial space at gateway of the site, sheltered from Preston Road and within green setting.
- 17 New junior football pitch (U11/U12).



Image 2: Concept Plan extract

Housing Mix

- 2.8 The housing mix is for discussion with the Council. R&HL are open to providing a mix that responds to the assessed local housing needs of Preston Council, such as some multi-generational and/or older people housing. The need for both forms of housing is confirmed in the eLP evidence base.

Public Open Space

- 2.9 The Open Space Assessment 2020 (OSA) states that Grimsargh Parish Council has identified a need for a football pitch. It is proposed that a junior pitch could potentially be provided to the west of the former railway line. This would respond positively to an identified local need while also ensuring there is no adverse impact on the effectiveness of the AoS. The pitch would not be visible from Longridge Road and it is worth noting that it is a use deemed appropriate in the Green Belt due to its acceptable impact on openness.

Biodiversity Net Gain

- 2.10 The land north of the proposed developable area could be allocated as a BNG Habitat Bank. This would, in addition to the AoS designation, prevent built development from occurring within the remainder of the AoS. The BNG Bank would need to be managed for a period of 30 years and it is extremely likely it would continue to provide ecological benefits worthy of retention beyond that period. There would be little, or no chance of the land being developed in the future.

Summary

- 2.11 R&HL have reviewed the planning history for this site and have identified an opportunity to deliver much needed housing in a form that is sensitive to its location and also strengthens the existing AoS, physically and visually. The development could come forward early in the plan period and secure housing of the type that is needed in Preston as well as a BNG Habitat Bank.

3 REGULATION 19 PUBLICATION VERSION

Area of Separation

- 3.1 The site is designated as an AoS on the Policies Map. However, it is considered that the evidence base does not justify this designation, in its entirety, and as such, the eLP is not sound.
- 3.2 It is acknowledged that two appeals proposing residential development have been dismissed because of the perceived impact on the effectiveness of the AoS. This will have undoubtedly informed the Council's decision to retain the AoS in its current form in the eLP. However, the development form being put forward by R&HL at Regulation 19 Stage has not been considered by the Council. It is considered that it represents a reasonable alternative that requires full and detailed consideration.
- 3.3 The Concept Plan demonstrates that the site can be delivered for housing in a sensitive and sustainable manner. This is supported in the LVS, which concludes as follows:
- Built development is only proposed in the most southerly aspect of the AoS and although there will be a greater footprint of development in the 'gap' which will reduce the physical separation, the existing land, retained as open between the settlements and the opportunities to enhance this landscape, as set out in the Concept Masterplan, result in an overall betterment to the landscape between the settlements, with improved Green Infrastructure and better connectivity through new and formalised routes.*
- Visually there is already intervisibility between the settlements, limited by intervening hedgerows and trees. Overall, the proposed development will not appear to encroach on landscape or have the perception of reducing the separation. From wider views to the west, it is unlikely that the proposals will be visible. The proposals are located on the edge of Preston and although there will be new development it will not appear incongruous or out of place.*
- The built development site makes only a small contribution to the wider LCA, the wider countryside displaying more of the features such as wooded river corridors, historic villages and limestone outcrops and knolls.*
- Overall, it is considered that the development proposals will have very limited landscape and visual effects and will not be contrary to the emerging AoS policy. Overall, the proposals, in their entirety, will improve the landscape of the AoS through the delivery of new recreational links, enhanced and new biodiverse habitats, through securing the AoS in perpetuity and through the long term positive management of the landscape if the AoS through a HMMP or similar approved.*
- 3.4 The eLP AoS should be revised to enable the development form proposed by R&HL to come forward during the plan period. There are obvious landscape benefits that would arise from the development, but it can also deliver the form of housing needed in the area and a BNG Habitat Bank.

Older People Housing

- 3.5 As stated in Section 2 of this CS, R&HL is willing to deliver a mix of housing that is needed in Preston, including some housing for older people.
- 3.6 Para. 63 of the NPPF states that *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in in planning policies”*. The eLP evidence base identifies a need for housing for older people in Central Lancashire yet the eLP is largely silent on reflecting this need through its proposed development.
- 3.7 It appears as though one site is being identified as simply being suitable for older people housing (HS4.14, Longridge) with Preston West and North West Preston Strategic Allocation policies stating that they will deliver some older people housing though no figure appears to have been set out. It then appears as though the eLP seeks to rely on all dwellings being built to M4(2) standard with 4-5% of affordable dwellings being built to M4(3) standard. This gives no certainty whatsoever that these dwellings will be occupied by older people. Indeed, they could all be occupied by young families.
- 3.8 The failure to plan for older people housing when the evidence base identifies a need demonstrates that the plan is not positively prepared, justified or consistent with national policy.

Biodiversity Net Gain

- 3.9 The NPPF states that plans should identify and pursue opportunities for securing measurable net gains for biodiversity (para. 192). The eLP has identified one site that it will rely upon to deliver off-site BNG required for all of its development sites, across the three authorities. The evidence base does not appear to justify such a limited provision of BNG Habitat Banks to support such a large amount of development. Furthermore, additional development will be required during the plan period to meet the true housing need as set out by the Standard Method requirement.
- 3.10 The eLP is not sound for this reason and must secure further land for BNG Habitat Banks if it is to deliver sustainable development in line with national policy.

4 CONCLUSIONS

- 4.1 It is considered that the eLP is not sound because it has not considered the development form proposed by R&HL as a reasonable alternative and the evidence base does not justify the AoS designation in its entirety. The AoS should be reduced in size in order to enable the development of c. 90 units, including the form of housing needed in the area, to come forward alongside a BNG Habitat Bank.

Appendices 1 – 3 submitted as separate pdf document