

Representor: FI Real Estate Management Ltd (FIREM)

Contact: Mr John Francis (Plan Red)

Representor ID: A31

STATEMENT OF EVIDENCE

Evidence is co-authored by Gateley, Icen, JLL, Plan Red & FIREM

Matter 4 – Strategic Sites & Mixed Use Allocations

(Policies SS3 – SS6 & EC5 & 6)

Issue 4 – Are the proposed strategic allocations justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?

Note: This matter focusses on the merits of the individual strategic sites and mixed use allocations, the process for selecting site allocations is dealt with in Matter 2.

Policy SS3 North West Preston/Bartle

Response to Question 4.1:

No comment.

Policy SS4 – Fulwood Barracks

Response to Question 4.4:

No comment.

Response to Question 4.5:

No comment.

Response to Question 4.6:

No comment.

Policy SS5 – Preston West

Response to Question 4.7:

The representer accepts there are benefits associated with allocating land for development in this broad location. This is by reference to its location on the inner side of the PWDR and as the site can be accessed from this road. However, it has concerns about a number of other aspects of the strategic site allocation. These, by reference to matters raised by the Inspectors, are as follows:

- Size – the site area is 155.5ha. This is a substantial area of land. The representer has concerns regarding the potential of all areas of the wider site to be developed for the preferred uses and within the plan period. In part this is

influenced by the lack of an agreed Masterplan for the land. It is usual for sites of this scale and nature that a detailed and tested masterplan comes first. Such masterplans set the scene and parameters for which areas of land are to be developed for preferred uses, and when, and also how they will be accessed and serviced. In the absence of a masterplan one has to question whether all that is expected of this strategic site, which the Topic Paper acknowledges is seriously constrained, can be regarded as having been fully tested prior to it being included in the CLLP. This raises concerns about delivery and when this occur, i.e., will it be within the plan period.

- Capacity – can this site, which is clearly constrained, including by reference to access, heritage assets, ownerships, existing uses (including golf course), flood risk and drainage, ecology, viability, and which needs significant new infrastructure (covered but not in detail in the Topic Paper), be guaranteed to deliver all that is expected of it – 1,850 dwellings overall, but only 450 in plan period, and 63.3 ha employment. In the absence of further work on feasibility and viability, supported by a fully tested masterplan, the representer, like other objectors, is concerned that all expected of this strategic site in development and delivery terms is not guaranteed. The lead developer, Harworth Developments, has acknowledged in its representations on Reg 19 version of CLLP, that it does not expect all of the planned 63.3 ha of employment land to be delivered. And BE Group, in its 2024 ELR, raises issues and concerns regarding the potential of the site to deliver employment development. Finally, the key development considerations set out in Policy SS5 state that Phase B, south of the railway line, is not expected within the plan period.
- Layout – no masterplan has yet been formulated for the overall site. This is unusual. Where a site is being considered as a key strategic site, which is the case here, it is normal that a tested masterplan forms part of the evidence base in support of the proposed allocation. Such plans provide confirmation and comfort that planned developments / levels of development can be delivered where and when they are expected. In the absence of such a masterplan there has to be doubt that the strategic site will deliver all that is expected and required of it.
- Employment / housing land split – The split between the two main uses, residential and employment, appears arbitrary and calculated simply to ensure there is no shortfall. But in any case the targets for development and related delivery as set out earlier is not guaranteed. The Topic Paper confirms that the level of development and split between the two main uses will be determined through the matserplanning process. This has yet to take place. What if this process finds that only half of the residential land target can be delivered over the plan period, which would be circa 225 dwellings. Similarly regarding the envisaged amount of employment land to be delivered. What if only two thirds of the planned 63.3 ha employment land is capable of being delivered (42 ha) and only half of this is likely to be delivered in the plan period (21 ha), the CLLP is circa 42 ha short of employment land based on stated need. And the figure could be greater than this. How will the plan deal with this? By the time it becomes known that there are issues of this nature the now draft CLLP will have been long adopted. Surely, based on known issues and constraints affecting the site, detailed in the Topic Paper, and confirmed by the likes of

Harworth Development and BE Group, a less bullish approach would be more appropriate, and contingency plans should be promoted.

- Infrastructure requirements – reference to the Topic Paper confirms that a considerable amount of new and upgraded infrastructure is required to deliver this development initiative. These include infrastructure linked to transportation needs, utilities, education, health and social care, green and blue, waste and recycling, social and community facilities and emergency services. Yet work to confirm exactly what is required, and at what cost, and how it will be paid for and by whom, will come later (through a bespoke infrastructure delivery schedule). This should be available now. In its absence the site cannot be regarded as being capable of delivering all planning and development expectations required of it. As the key strategic site of the plan this is not acceptable. It brings into question whether the plan can be regarded as sound
- Assessment of the effects of development and necessary mitigations – the same points made above also apply this point. The Topic Paper alludes to the fact that the planned development at the site will cause a wide range of effects which will necessitate a range of mitigations, yet there are no worked up details of what these will be, how and where they will be addressed, and the likely cost of such mitigation which will further impact on viability. This raises concerns about deliverability and viability of the target levels of development.
- Delivery – same points as above. We also draw attention to the fact that an overall target of 1,850 dwellings is set for the site. Yet the policy contends that within the plan period, 2023-2041, it is likely that only 450 dwellings will be delivered. The fact only approximately 25% of the target will be delivered in the plan period adds weight to our views and concerns regarding the capabilities of this site to deliver exactly what is expected of it. And this is further impacted by the level of necessary new and upgraded infrastructure required to deliver development at this site. A substantial amount of front loaded funding will be required to deliver a relatively small amount of development, which also impacts on viability, unless substantial amount of public sector funding will be made available. In a similar vein, if only 25% of the employment land target of 63.3ha is capable of being delivered in the plan period, 16ha, because of similar issues, then there will be an even greater shortfall than we have already suggested might the case. And one has to regard this as a reasonable prospect given our and the stated concerns of Harworth Developments and BE Group.
- Viability – the representer has concerns that the viability issues raised in the Topic Paper appear to have been glossed over and not given due weight. The CLLP Viability Main Viability Report (IT05) identifies the site as RAG rating red: site as medium in terms of location / value zone. The site is clearly identified as being in a medium value zone. However, the Topic Paper gives weight to the fact that, because it is not far from a high value zone, there is a likelihood values will increase. There is no evidence to back this assertion up. Nor is there any guarantee this will occur. The site is either in a medium value zone or it is not. It also notes that potential improvements to net gross ratio and / or density would have a significant effect on viability. But there is no guarantee of this occurring. It also surmises that employment land receipts could improve

viability. But there is no evidence to suggest this is guaranteed to occur. And it the representer's experience that this is unlikely given the site's profile and location. There is also confidence drawn from the fact a master developer with the right experience and knowledge of developing strategic sites will create the opportunity to further mitigate risks and ensure the site is deliverable. Yet this developer, Harworth Developments, has also raised concerns about the site's potential. To take the approach followed in the CLLP on this site is a serious leap of faith. To the representer there are a lot of ifs and buts in all of this, which collectively do not create confidence that the planned levels of development that are required to be delivered through this strategic site initiative will be, and in this regard concerns about viability play a key role. This plays to the points we have already made about whether development targets planned through this strategic site initiative will be delivered within the plan period. A further related point on viability that needs to be raised, which is not covered in the Topic Paper, is the need to deal with BNG. Based on the representer's experience of major developments on greenfield sites, BNG is a serious impediment that impacts to a great degree on viability. Dealing with BNG on major developments typically adds many millions of pounds of overall costs. These are costs which, by reference to planning legislation, cannot be avoided. Based on the points made above, the matter of viability will heavily influence how much, where and when development at this strategic site will be delivered. The levels of uncertainty are a serious issue and should be a major concern as they seriously influence whether the CLLP in its current form can be regarded as sound.

Response to Question 4.8:

No. there are several site related constraints that are left open ended. For example, flood risk (on those parts of the site known to be subject to flood risk). With regard to the need to apply the exception test (as set out in NPPF), the related key conclusion in the site specific Topic Paper is to the effect that development can be safe for its lifetime, which is 75 years for non-residential and 100 years for residential. But there is an acknowledged absence of modelled climate change data (including use of proxies to inform future fluvial flood risk) that allows this conclusion to be drawn. The Topic Paper goes onto acknowledge that it cannot currently be proven that the site will remain safe over its lifetime and therefore the exception test cannot be passed. This seems to us to be a potentially serious impediment to development which should have already been addressed, which also raises issues linked to soundness of the plan by reference to the inclusion of this strategic site in the form it is presented.

Response to Question 4.9:

No. For similar reasons to those set out above, Policy SS5, by reference to the large number of uncertainties which affect how it might perform by reference to delivering residential and employment development over the plan period, does not provide clear direction as to how a decision maker should react to a development proposal. A number of modifications to the policy are required as follows:

- The policy should be amended to create greater certainty on several matters including:

- True development potential of the site. Will 450 dwellings and 63.3 ha of employment be delivered within the plan period? We do not think so, particularly regarding delivery of employment development. We regard 63.3 ha to be overly ambitious given location of the site, type of employment development most needed (which site cannot deliver) and market interest. The delivery figure, least over the plan period, should be reduced. We regard delivery of approximately a third of the 63.3 ha, 21 ha, to be a reasonable target.
- Specific necessary new and upgraded infrastructure, and timings for it, need to be specified.
- How infrastructure will be delivered and by which party and when.
- What levels of development can be brought forward once specific items of infrastructure are delivered, i.e., key triggers to release phases of development.
- Planning of phasing to ensure at least some development is delivered close to the start of the plan period rather being loaded towards the end of the plan period or after it has ended.
- More detail on effects of how BNG might be dealt with and also regarding loss of a golf course.

Policy SS6 – Pickering’s Farm

Response to Question 4.10:

No comment.

Response to Question 4.11:

No comment.

Response to Question 4.12

No comment.

Policy EC5 and EC6– Mixed Use Allocations – Chorley and South Ribble

Response to Question 4.13:

Our comments specifically apply to Policy EC6.1 – Cuerden. The policy confirms it is a 66 ha site. 16 ha is planned for residential (220 dwellings). 50 ha is planned for employment uses / development (Use Classes E(g), B1 and B8)). For some time, certainly preceding publication of the Reg 19 version of the CLLP, it has been known that circa 15.5 ha of land has been secured by a local NHS Trust for the development of a major teaching hospital. This is planned on land previously expected to be brought forward for employment uses. This suggests that the 50 ha of land required to be brought forward for employment development will not be achieved. At best 34.5ha of land will be brought forward for this use. The potential loss of 15.5ha of land for employment development needs to be accommodated elsewhere in the CLLP or at the very least acknowledged so as to support, potentially, a windfall development for employment.

Point (a):

No comment.

Point (b):

Based on the point made earlier, i.e., what started off as a strategic employment site has morphed into a mixed use site, and which year on year has seen the employment land component reduced. A key question for the CLAs is whether there is serious potential the planned 50ha of land for employment- now reduced by 15.5ha- might be further reduced over the plan period through pressure for other non-employment developments.

Point (c):

No comment.

Point (d):

The site was first identified in the Central Lancashire Core Strategy 2012 as a strategic site for employment development - 65 ha for high quality manufacturing uses and knowledge-based industry. Since then it has slipped from a strategic site to a mixed use allocation in CLLP. Since it was first allocated it has been added to and changed in terms of its size and scope including the development intentions expected of it. The site was first introduced in a development plan that was adopted in 2012 yet it has so far failed to deliver much of the development it was / is proposed for. We are of the view this is due to site related constraints and viability related issues, raising concerns as to whether the required 50ha, now reduced by 15.5ha, to 34.5ha for employment uses will be delivered across the plan period, if at all. We are also aware that viability concerns were identified during previous proposals and relied upon the planned delivery of a large retail development, including a major Ikea and a major M&S development to enable the employment land element. It can only be expected that this position has not changed, particularly as the retail scheme fell away.

Point (e):

We question why the policy might need to be potentially made more flexible than currently proposed, which infers that it might be a better and more effective policy for development if it were to be further watered down to facilitate it being able to accommodate a greater range of uses / developments than at present. This is particularly given the likely viability concerns associated with the site. In this scenario, if deemed appropriate, there is even greater prospect the site will under deliver in terms of employment land / development, meaning its reduced potential for circa 35ha of employment land / development will be further reduced.