

# THE BROOKHOUSE GROUP, CUERDEN STRATEGIC SITE

## COMMENTARY ON THE RESPONSE OF BARTON WILLMORE TO REPRESENTATIONS BY BROOKHOUSE

| <p>The following is a schedule attached to the Barton Willmore Letter to LCC dated 24 February. It provides a commentary and response to matters raised in the Town Legal letter dated 6 December 2022 and the Representations on Planning Matters dated December 2022.</p> <p>This schedule provides comments on the response by Barton Willmore. It adopts the same format as the Barton Willmore schedule attached to their letter of 24 February. It should be read with our Statement in Response which focusses on the main issues.</p> |   |  |   |
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|   | Issue Raised by Brookhouse  | Response by Barton Willmore  | Brookhouse Comments   |
| 1.  | <p>Scheme does not provide comprehensive development of Site as required by Policy C4</p> | <p>The applicants assessment of compliance with Policy C4 is set out in the submitted Planning Statement.</p> <p>The application scheme has been guided by the approved site wide masterplan and allowances have been made within the proposed development to provide access to the neighbouring plots to enable its development. This approach is consistent with the aims of Policy C4 and the definition of "Comprehensive Development" set out within the glossary of the SRBC Local Plan:</p> <p><i>[Comprehensive Development] Reflects a strategic framework for the vision of a site's development. <u>Individual parcels of land within a larger site may be delivered at varying times</u>, however all development should take place in line with a wider strategic framework to avoid uncoordinated piecemeal development and ensure the proper planning of an area. Agreeing a strategic framework and vision for a</i></p> | <p>The application does not accord with the Masterplan, nor does it accord with Policy C4 and the requirements of the Masterplan as set out at paragraphs 9 to 15 of the Statement in Response.</p> |

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|    |   | <p><i>site prior to any development taking place is essential. <u>In many cases, the delivery of a comprehensive development would be achieved through an agreed masterplan for the wider site.</u></i></p> <p>This definition confirms that the piecemeal development of allocated land can be acceptable where the individual proposals help to achieve the aims of the wider masterplan.</p> <p>The Proposed Development accords with the adopted Masterplan and facilitates the delivery of a comprehensive scheme of development in the long term, pending the submission of a planning application in respect of the remaining parts of the allocated CSS (beyond the applicants control).</p> |  |
| 2. | Housing and town centre uses not justified. | The justification for these uses is set out within the Planning Statement and Financial Viability Statement submitted as part of the application. As BGL have made no direct reference to these documents it is unclear which elements of the justification it does not agree with.  | <p>See paragraphs 28 and 29 of the Statement in Response.</p> <p>Local Plan Policy C4 requires uses other than employment to be justified as being the minimum necessary to deliver the required infrastructure. The viability appraisal is opaque, There is no justification or explanation to demonstrate the extent of necessary infrastructure and its cost. Further, the viability appraisal has not been the subject of an</p> |

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|    |  |   | <p>independent audit, unlike the 2017 approved scheme.</p> <p>The viability appraisal does not provide evidence to justify housing and town centre uses within the application.</p>   |
| 3. | ES flawed on basis that comprehensive redevelopment not considered as an alternative.                      | <p>There is no obligation for a developer to assess other potential development sites or scenarios which may include land which is not within the Applicant's control. The key words (within the quote from the EIA Regulations as provided by BGL) are " ...studied by the developer ...". For the purposes of this application the developer did not study development of the wider CSS and is therefore not under an obligation under EIA Regulations to include an assessment of the CSS. This is set out in Chapter 4 of the ES which explains that it has not been necessary to consider alternative locations for development given that the nature of development proposed is consistent with that supported by Policy C4 and the CSS allocation.</p> | Noted.  |
| 4. | No evidence of linkages through to BGL land and no assurances that such access would be subject to ransom. | <p>This is not an accurate statement as the development parameters include access links between LCC and BGL land with a view to forming such a road link.</p> <p>Given that the land owned by BGL does not form part of the application, it is not possible to clearly mark this route on any document or drawing intended for formal</p>   | <p>Illustrative drawings supporting the application have been amended to show the location of access points into the Brookhouse parcels of land. This is addressed at paragraph 14 of the Statement in Response.</p> <p>However, the position is unchanged in that there is no commitment to provide access</p> |

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|    |   | <p>approval, but the intended links are clearly shown on Parameter Plan 2. This drawing demonstrates that:</p> <ul style="list-style-type: none"> <li>• The intention is that access to the northern most plot of BGL land will be provided via Development Zone E, which features access to Stanifield Lane. This approach, serving both plots of land via a single point of access, is consistent with the approved Masterplan.</li> <li>• The intention is that access to the southern plot of BGL land is provided via Development Zone D. Two points of potential access are provided to the BGL land.</li> <li>• The intention is that access to the central plot of BGL land is provided via Development Zones A and D. A total of three points of access are shown.</li> </ul> <p>It is therefore evident from Parameter Plan 2 that a comprehensive network of access roads is being planned for and will be established into and through the site. The exact positioning of those roads through the BGL land will be confirmed should they progress their own applications.</p> | <p>points so as to enable the development of the Brookhouse parcels without delay as required by the Masterplan and secure a comprehensive development of the CSS as required by Policy C4.</p> |
| 5. | <p>Irregular shape of Development Plots compromise the scale of employment buildings which can be provided.</p> | <p>The position and shape of the Development Plots are appropriate.</p> <p>The Illustrative Development Framework Plan was produced to inform the design and to establish the most</p>  | <p>This issue is dealt with in detail in the Statement in Response at paragraphs 17 to 27.</p>  |

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|    |  | <p>appropriate position for the access points, access roads, and Strategic Green Infrastructure.</p> <p>The layout of the Illustrative Development Framework Plan was informed by various consultants to achieve a balanced design, and to reflect other, non-design related considerations such as development viability.</p> <p>Whilst the final design and layout of these areas will be brought forward and assessed at Reserved Matters stage, the illustrative masterplan was designed to accommodate a realistic layout which would provide a range of appropriately sized buildings, informed by current market indicators.</p> <p>Permission is being sought for the same scale of development ( on the land within the applicants' control) as the previously permitted scheme. As a result, the scale of the proposal and individual uses is not compromised. Also see below in response to point 8.</p> |   |
| 6. | <p>Illustrative masterplan layout is unfeasible due to site topography (Plot D).</p> | <p>In preparing the development parameters, the Applicant has had regard to the topography of the existing site and, crucially, the extent to which the site levels could reasonably be altered.</p> <p>The Applicant does not agree with the assertions, as the assumptions made with respect to site levels for Zone D are consistent with the existing topography which has been surveyed in detail</p>  | <p>Irrespective of topography, the application will lead to a sub-optimal use of the CSS.</p> |

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| 7. | Ability to provide link from Stanifield Lane to M65 Terminus roundabout prejudiced         | <p>As above (response to point 4) this is incorrect.</p> <p>Whilst no direct link is provided as part of the current planning application (due to the existing land ownership position), Parameter Plan 2 demonstrates the ability to create a link from Stanifield Lane through to the M65 Terminus roundabout.</p> <p>This necessarily requires use of the BGL land which is obviously not within the applicants control. Such a position would however be consistent with the access strategy established via the adopted 2015 Masterplan and BGL would need to adhere to this should they seek the development of their land parcels.</p> | <p>A link from Stanifield Lane to the M65 Terminus roundabout was considered necessary to support the 2017 approve scheme for the whole site.</p> <p>The highway impact of the current application has been tested with a link in place. However, the link forms no part of the current application.</p> <p>As matter stand, the highway assessment relies on development outside the application site (the Brookhouse land) to render the application acceptable.</p> |
| 8. | Adopted piecemeal approach substantially under delivers the potential development on site. | <p>This is incorrect and misleading.</p> <p>The floorspace proposed within the applicants control is consistent with that proposed under the previous planning permission.</p> <p>In addition the submitted Economic Benefits Statement prepared in support of the application assesses the potential benefits that would be delivered from the application scheme in isolation but also should the BGL land come forward for development. It concludes that the scale of potential economic benefits would be comparable to those envisaged as part of the previous planning permission.</p>   | <p>See response to points 5 and 6 above and paragraphs 17 to 27 of the Statement in Response.</p>  |

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|     |  | <p>It should of course be noted that, the previously permitted scheme was not delivered and as a result no economic benefits were forthcoming. The applicant is confident the submitted scheme is viable and deliverable and as a result the benefits quoted will come forward. Clearly, these could be maximised across the Site should BGL bring forward their landholding for development.</p>  |  |
| 9.  | <p>Strategic green infrastructure design is flawed as it does not provide a comprehensive approach across the CSS.</p> | <p>As above, Policy C4 allows the phased development of CSS provided it accords with the approved Masterplan.</p> <p>The strategic green infrastructure proposed on the land within the applicants control is consistent with the Masterplan. This responds to existing landscaping features present at the edges of each parcel of land and aims to retain (and enhance) existing trees and hedgerows where possible. Whilst this approach may restrict the locations in which new access points can be provided (ie between such landscaping features, or where minimal impact is incurred) we believe an appropriate balance has been struck between the two.</p> | <p>See paragraph 10 of the Statement in Response.</p>  |
| 10. | <p>Piecemeal approach will increase pressure to release Green Belt land elsewhere.</p>                                 | <p>This is incorrect and misleading.</p> <p>The Application Site (and indeed much of the allocated CSS) has been allocated for development in successive development plans but has not come forward for development. Neither Policy C4, nor the adopted</p>  | <p>The response of Barton Willmore misses the point completely.</p> <p>In order to meet further development needs the emerging Local Plan must release land from the Green Belt. Specifically, the emerging plan</p> |

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|     |   | <p>Masterplan, prescribe a set amount of floorspace to be achieved within the CSS. Should BGL bring forward development proposals on their land parcels (as demonstrated above) there would be no reduction in the quantum of development delivered or the benefits.</p> <p>In any event, the recently published Central Lancashire Local Plan Preferred Options - Part One consultation, provides an update regarding the spatial strategy for the area. It notes that all three authorities, including SRBC, are considered to have "ample" employment land to meet needs.</p> <p>As a result, there is no evidence to suggest that the development proposals would result in underdevelopment of the Application Site, nor that there are any wider land-supply constraints which might suggest that a minimum quantum of development must be achieved in order to safeguard Green Belt land.</p> | <p>anticipates a need to release land in Chorley to meet housing needs and in South Ribble where it states there is justification for a new settlement.</p> <p>NPPF paragraph 141(b) requires LPAs to optimise the density of available land in line with chapter 11 of the NPPF as a reasonable option before releasing land from the Green Belt bearing in mind the requirement to demonstrate exceptional circumstances to justify a change.</p> <p>A sub-optimal development of the CSS is contrary to National Policy because land will need to be released from the Green Belt to meet future development needs.</p> |
| 11. | <p>Viability Assessment is not transparent - unclear how the £59.6 infrastructure cost has been calculated.</p> | <p>As outlined above, we believe the Viability Assessment provides sufficient explanation as to what assumptions and estimates have been made to reach the figures quoted and to enable the Viability Statement to reach an informed conclusion. We do not, therefore, consider it necessary to provide further detail.</p>  | <p>The Viability Assessment is not transparent. As noted in response to Point 2 above, the non-employment uses cannot be shown to be justified and the minimum necessary to ensure the delivery of development.</p>  |



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| 12. | Economic Benefits Statement should be based on Maximum Parameters rather than the illustrative masterplan. | <p>The submitted Economic Benefits Statement clearly states and explains that the economic benefits of the scheme have been based on the Parameter Plans rather than the illustrative masterplan.</p> <p>BGL comments are therefore incorrect.</p> | <p>Barton Willmore misunderstand the point of objection.</p> <p>Paragraph 25 of the Representations on Planning Matters dated December 2022 indicates that the Benefits Statement is not based on a realistic assessment of the quantum of development likely to be achieved. By way of example, reference is made to Plot A of the illustrative plan for which the drawing shows 9 units comprising 17,000 square metres floorspace. However, the Maximum Parameter for this Plot, on which the Benefits Assessment is based is 30,000 square metres. It is not apparent how Plot A could realistically deliver almost double the amount of development indicated in the illustrative plan.</p> |
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