

Matter 2/ Examination Day 4 (AM) Site W
Representation No 120/124

Wainhomes Developments Ltd

SOUTH RIBBLE SITE ALLOCATIONS DPD EXAMINATION

DAY 4 (AM) - SITE ALLOCATION W

EPP reference: ST1-8896-SH

February 2013

CONTENTS:

1.	INTRODUCTION	1
2.	SCALE OF DEVELOPMENT	1
3.	POLICY C ₃	1
4.	APPENDICES	5

1. INTRODUCTION

- 1.1 Emery Planning Partnership is instructed by Wainhomes Developments Ltd to attend the morning session of Day 4 of the Examination into the South Ribble Site Allocations DPD. This session deals with Site Allocation W which is the land between Heatherleigh and Moss Lane.
- 1.2 Our client has a strategic land interest within the site which is shown on the plan enclosed as Appendix EPP1. There are 6 separate land ownerships within the area edged red so our client can deliver this parcel of land through their comprehensive agreement with these owners. This is the land north of Bannister Lane which is in the northern half of the wider allocation.
- 1.3 Our submissions to the Publication Draft are set out in our letter dated 14th August 2012. In summary we support the allocation of site W and our sole objection is that the explanatory text does not permit a vehicular access from Bannister Lane. We maintain this objection and consider that such a clause is not positively prepared, justified, effective or consistent with national policy. We set out below why this is the case.

2. SCALE OF DEVELOPMENT

- 2.1 Policy D1 states that the site could accommodate 600 dwellings within the plan period. We note that the HCA advocate potentially 800 dwellings across the whole site and we do not contest that figure. Whatever the final capacity may be our client's land would provide some 120 dwellings and no more than 150 dwellings.
- 2.2 We therefore consider that the policy should have a degree of flexibility and that the number of dwellings should be specifically referred to as a minimum. This should either be in the policy itself or in the supporting text. This provides the necessary flexibility should the masterplanning exercise actually deliver a greater site capacity as the HCA considers appropriate.
- 2.3 It also provides greater flexibility should there be a need to deliver a greater number of dwellings should the housing requirements increase, as may well be the case following the publication of the household projections following the release of the 2011 Census data or through a future review of the Core Strategy.

3. POLICY C3

- 3.1 Policy C3 specifically relates to this site. Three criteria are set out, these being:

- an agreed master plan for the comprehensive development of the site, to include the provision of residential development with scope for community and leisure facilities if required by the council within the plan period;
- a phasing and infrastructure delivery schedule;
- an agreed programme of implementation in accordance with the master plan and agreed design code.

3.2 We agree that a masterplan should be prepared for the key land interests across the site. This support is based on that exercise being undertaken as soon as possible so that the site can deliver early in the plan period. In light of this our client has undertaken a masterplan for the northern part of the site and has discussed its content with both the HCA and the Council who are both in agreement with its content. This is enclosed as Appendix EPP2. This master plan links into the land to the south which is currently the subject of an outline planning application (07/2012/0627/ORM).

Phasing of the Site

3.3 The table on page 33 of the plan splits the delivery of the site into three phases, with 200 dwellings in each phase. This equates to 40 dwellings per annum. We consider that this should not be strictly adhered to as there is likely to be a number of developers on this site and their delivery rates should not be artificially restricted. Therefore the policy should clearly state that these requirements are a minimum and can be exceeded. An earlier delivery of this site would only assist the overall housing position of the council which has under-delivered hence why the Council accepts that the 20% NPPF buffer applies.

Access Arrangements

3.4 Paragraph 6.25 states that access to the site must be from Croston Road, Heatherleigh and Moss Lane. It states that there is to be no access to the site from Bannister Lane. We contest this position and request that this specific requirement is deleted from the plan. We consider that there is no justification for such a restriction, and the submissions (copy enclosed with our representations to the Publication Draft) by our client's highway consultants, Royal Haskoning, demonstrate why this is not necessary. In summary, the conclusions are:

- it would provide greater integration with the existing urban area;
- technically the proposed development can be easily accessed off Bannister Lane, with some localised widening;
- the layout of Bannister Lane with the proposed widening would fully accord with the latest highway design standards/guides;

- in terms of capacity, the existing Bannister Lane/Croston Road junction can easily accommodate the additional development traffic;
- the proposal for the limited 150 houses will be suitably integrated with the wider allocation site by facilitating through pedestrian and cycle movement along a 'green lane' type route from north to south. There will be no physical vehicular route via the site through to Flensburg Way/Penwortham Way;
- the proposals will not prejudice the overall masterplan approach to the development of the wider allocation site;
- given the large size of the wider site and its location, it would be preferable to have multiple access points to increase permeability and integration of the overall site by all modes of transport; and,
- the proposed access off Bannister Lane will also assist in integrating the existing dwellings on Bannister Lane to the wider proposals in this area.

3.5 NPPF sets out 4 tests of soundness. We consider that the proposed exclusion of vehicular traffic accessing Bannister Lane is contrary to all four for the following reasons:

- **Positively prepared** – whilst we consider the allocation and indeed the plan in general seeks to meet the objectively assessed development needs from the adopted Core Strategy the exclusion of an access onto Bannister Lane does not meet the necessary infrastructure requirements. The reason for this is that a development of some 600 to 800 dwellings will require multiple access points and not having a vehicular access into the heart of the site cannot be described as positively prepared particularly when Bannister Lane is an existing residential road and has the capacity to serve an additional 150 dwellings.

The second point under this test is that the proposed access points are from the north and the south. Without a vehicular access from Bannister Lane, this would result in two separate developments to the north and south with the important green linkages not being in place until later phases.

- **Justified** – the exclusion of Bannister Lane cannot be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Indeed there is no clear explanation in the evidence base as to why Bannister Lane has been specifically excluded. It cannot be on highway grounds as the Royal Haskoning report confirms that it is capable of up to 150 dwellings. There were no alternatives i.e. with an access from Bannister Lane set out in the Sustainability Appraisal. We consider that a vehicular access

from Bannister Lane would increase sustainability as it would maximise permeability and integration of the overall site by all modes of transport.

- **Effective** – this requires the plan to be deliverable over its period. As noted above Site W is proposed to deliver between 600 and 800 dwellings over the plan period and 200 dwellings by 2016, which is in 3 years time. To achieve this level of development will require multiple access points. Not having a vehicular access into the heart of the site cannot be effective as it restricts delivery. Therefore having a greater number of developable parcels delivering will maximise the prospects of an effective plan.
- **Consistent with national policy** – this test requires the plan to enable the delivery of sustainable development in accordance with the policies in the Framework. NPPF seeks to “*boost significantly*” the delivery of new housing. As we note in the other three tests above having a greater number of developments parcels coming forward sooner can be the only way to achieve this aim. To artificially constrain delivery on this strategic site without any sound justification is directly contrary to this test.

3.6 Since these representations were submitted, our client has had further dialogue with the Council and the Homes and Communities Agency. One alternative strategy is that our client’s land is accessed from Bannister Lane to enable their 120 dwellings to be built in the first phase of the plan period. The key change to the complete removal of the reference to Bannister Lane is that once the HCA land to the north comes forward for development, then the land under the control of Wainhomes would then be accessed from the north and the access to Bannister Lane would be closed to vehicular traffic as envisaged by policy C3. An initial layout has been prepared to show how this would be achieved and it is enclosed as Appendix EPP3. A more detailed plan of the access arrangements is shown as Appendix EPP4.

3.7 The benefit of this strategy is that the Council’s aspirations in Policy C3 for the fully completed development would be realised but it enables our client to deliver some 120 homes earlier in the plan period which would clearly assist the council in meeting its five year housing land supply. Indeed recent appeal decisions have confirmed that the Council should be applying the 20% buffer so there is an even greater need for early delivery.

3.8 Notwithstanding the suggested change our client still maintains that Bannister Lane is entirely appropriate for some 120 dwellings and therefore the sentence in paragraph 6.25 of the plan should be removed. If the suggested change is preferred then the supporting

text should be changed to state that up to 150 dwellings can be accessed from Bannister Lane in the first phase of development and that that access would be stopped up for vehicular traffic once an access from the north is provided to the site boundary.

3.9 We will of course provide further detail on the above position at the hearing session.

4. APPENDICES

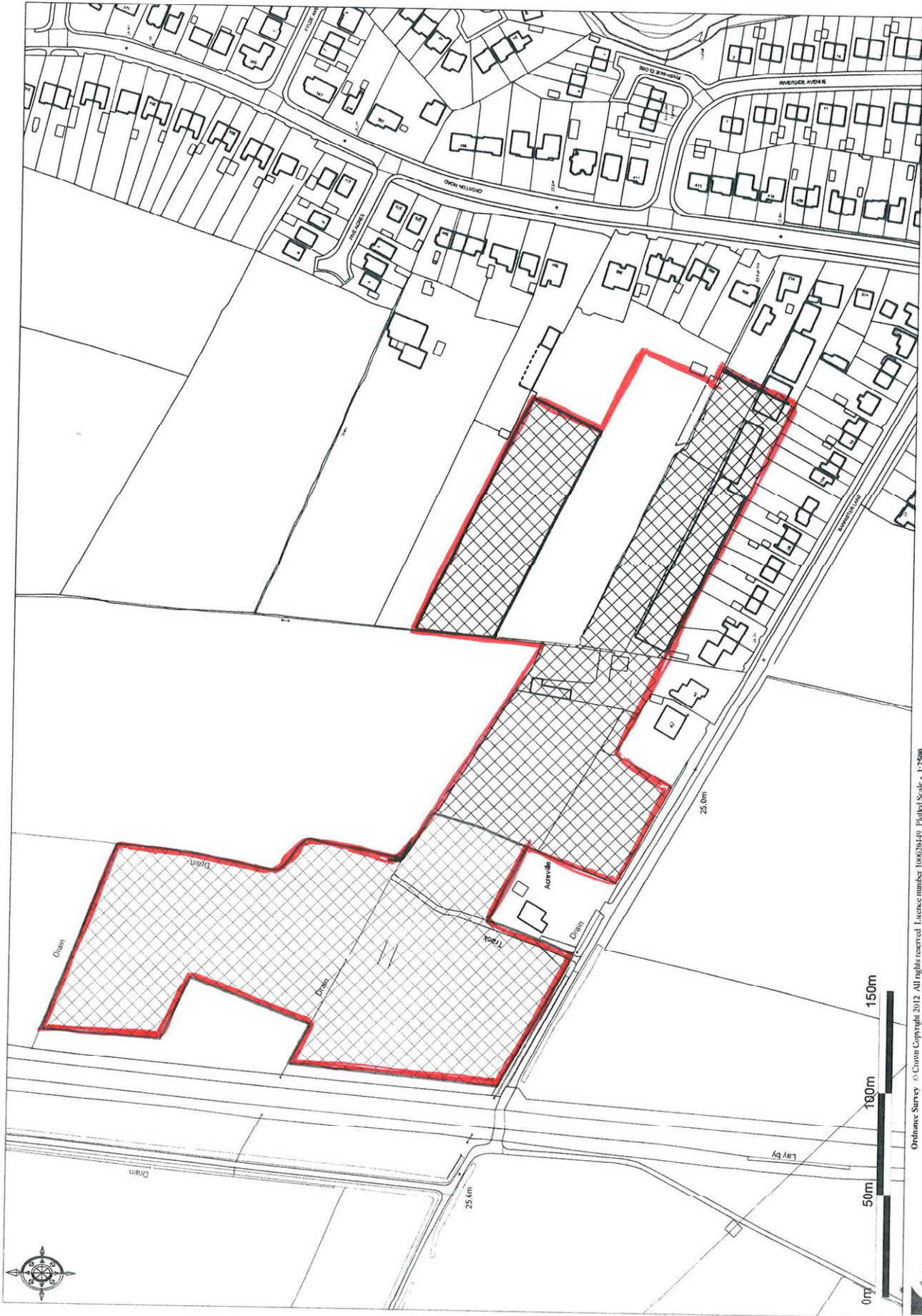
EPP1. Land in control of Wainhomes

EPP2. Masterplan

EPP3. Site Layout

EPP4. Access drawing

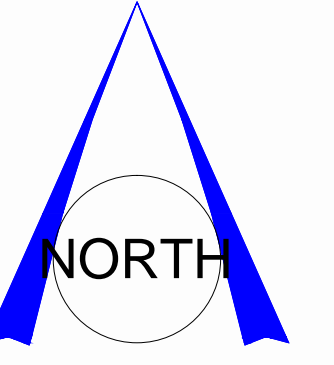
Land at Bannister Lane, Farington Moss, Leyland



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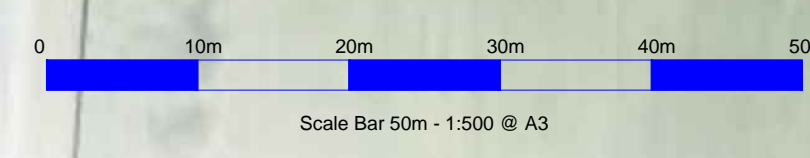
Mix Schedule

BEL	19%	BEL	19%
BAI	15%	BAI	15%
WRE	15%	WRE	15%
SCO	15%	SCO	15%
NEW	15%	NEW	15%
NEL	15%	NEL	15%
STE	15%	STE	15%
Total		112%	

PUBLIC OPEN SPACE CALCULATED AT REQUIREMENT OF 1.154 ACRES TO BE CONFIRMED



**BANNISTER LANE,
FARINGTON**



Client		WAINMCS	
Project		BANNISTER LANE, FARINGTON	
Drawing Title		SKETCH LAYOUT	
Drawing No.		1278WHD/BLF-SK01	
Date		12th Feb 2013	
Drawn		dglever	
Checked		dglever	
Approved			

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FUTURE ACCESS TO DEVELOPMENT SUBJECT TO COMPLETION DATE OF BUILD TO NORTH

A-B TO BE REMOVED ONCE NORTHERN ACCESS FACILITIES

