

3rd Floor
One St James's Square
Manchester M2 6DN

0161 837 6130
manchester@nlpplanning.com

nlpplanning.com

Date 6 January 2015
Our ref 41295/SPM/8116273v1
Your ref

Dear Councillor

Yew Tree Farm Masterplan SPD – Cabinet Report Version January 2015

This letter is in response to the final Masterplan SPD for Yew Tree Farm dated December 2014 and scheduled for consideration at Cabinet on the 13th January 2015. This letter sets out a significant concern relating to the content of the SPD and the quantum of land that has been identified in the plan.

As you are aware the adopted Local Plan requires that this site contributes **at least** 500 dwellings in the current plan period (up to 2027) and **at least** 10 hectares of employment development. The Local Plan also requires that land for **up to** 500 dwellings and **up to** 10 hectares of employment is safeguarded. This is a fact that is reflected in your officer's response to the representations when they state:

"Yew Tree Farm should deliver a minimum of 500 homes in the first phase. This will ensure that growth in the area is met within this Local Plan period. Additional proposals on other sites across the Borough will be judged on their own merits and against the requirements of the Local Plan. However, there is no maximum allowance of housing that may be delivered or moratorium on additional numbers of dwellings that could be built."

It is important to note that we have no objections to the principles of the SPD or the broad distribution of uses that are shown on the masterplan on page 17. The concern relates to the quantum of land that the Council have identified for release and the expectation that this will deliver the requirements of the policy in the Local Plan. These are matters that are mainly addressed on pages 37 and 38 of the SPD and the plan on page 39. It is this last plan that identifies the land to be safeguarded for the period after 2027.

This is the first time any plan has been published which shows safeguarded land in the north-east corner of the site (shaded yellow on the attached plan). The text on page 37 indicates that 23 hectares is identified for residential development. It applies a 75% net to gross ratio to claim a net developable area of 17 hectares. A 75% net to gross ratio would be fine for a smaller site but is not typical of large strategic sites where ratios of 50 - 65% are more appropriate. There are



significant infrastructure requirements, including strategic roads, surface water drainage, open space (including the linear and town parks) as well as other utility and service infrastructure.

In any event, this is not reflected in the actual masterplan which on page 39 identifies around 15 hectares of land which is developable for residential purposes (shaded red on the attached plan). Of this land around 1 hectare is identified for gateway housing, which the SPD refers to as high quality with good landscaping and may consequently be at a lower density. A further 8 hectares is identified for “elderly housing” which will include land that is not used for dwellings (i.e. care accommodation) and will impact upon the yield from this part of the site.

Of the land allocated in the SPD, only 6 hectares is identified for “residential development areas”. This area includes for a local centre which has the potential for retail and community uses. However, if developed at 30 dwellings per hectare, that 6 hectares would yield just 180 dwellings. The likely yield from the land identified by the SPD is in the order of 400 dwellings; considerable short of the **at least** 500 dwellings required by the Local Plan.

There are significant ramifications from the SPD’s approach. There is a real risk that the site will not achieve the number of dwellings required by the Local Plan. This threatens the implementation of the Local Plan policies and housing delivery across the Borough. This is an important site in the housing land supply, and failure here could result in significant pressure to release a Plan B site or additional safeguarded land. There is a real risk that additional land will have to be made available unless a more flexible approach to the release of Yew Tree Farm is adopted.

There are a number of detailed issues around the Councils approach and how its impact upon the development of Yew Tree Farm itself. As members will be aware, there are significant issues with surface and foul water in Burscough. The Local Plan requires us to provide attenuation within the site and discharge to existing ditches in the vicinity rather than to the combined sewer. This requires connections to the existing ditch system and the construction of large surface water retention and balancing ponds / flood basins. The conceptual drainage design has calculated that storage equivalent to 12,811m³ needs to be provided for the first phase of development. This will have significant land take as it will be provided in the form of swales, ponds and other surface features. This will impact upon the overall yield and have significant phasing implications which have largely been overlooked. The discharge point and natural fall within the site is also to the ditch at this corner of the site. This is within land which is suggested to be safeguarded. This will fundamentally compromise the ability to deliver these features and to accommodate flows from existing dwellings through the site.

Furthermore, safeguarding land in this location will ensure that neither the north or south road links to the industrial estate can be provided in the plan period. This will impact upon the attractiveness of the proposed employment land, possibly impacting upon delivery over the plan period, and perpetuate the significant access issues which exist (e.g. on Higgins Lane). This is a lost opportunity which has the potential to impact on job creation and investment on what is the largest new employment allocation in the Borough.

There remains reference to protected views on the masterplan, but this is not a protected view of anything so this reference and expression is misleading. This is confirmed in your officers response to representations which state:



“Protected views label was introduced to the masterplan in order to try and blend any development of the site at Higgins Lane where once built out will be adjacent to the new green belt boundary.”

There should be no suggestion this is a protected view. It is simply a part of the site where the relationship to the adjacent open countryside needs to be taken account of in terms of the form and design of proposals. This is not a reason, either on its own or with other matters, to consider safeguarding this piece of land.

In summary, we see no reason to artificially cap the land area unnecessarily. The SPD needs to be flexible. To do so brings practical difficulties and significant delivery implications. For example, there are ambitions to deliver accommodation for the elderly including care and extra care accommodation. Developers for these uses have not currently been found and land needs to be set aside whilst we see if there is interest from specialist developers of this accommodation. However, the lack of flexibility in the land supply will mean that my client will find it difficult to set aside land for these uses. This is simply unnecessary and not in the interests of a high quality comprehensive development.

The lack of flexibility in the SPD runs the real risk that delivery on this site will be hampered resulting in pressure to release land elsewhere. This is simply unnecessary and the safeguarded land in the north-west corner of the site should be omitted. There are more than sufficient controls that can be placed upon any planning application submitted in due course to ensure that delivery is in accordance with the Local Plan without unduly fettering the site.

We would urge you to carefully consider the content of the SPD and amend the plan on page 39 to omit the safeguarded land in the north-west corner and make the consequential amendments to the accompanying text.

Yours faithfully

A handwritten signature in black ink that reads 'Simon Pemberton'.

Simon Pemberton

Director

Sent to: Cllr David Alan Sudworth; Cllr Jane Houlgrave; Cllr David Griffiths; Cllr David Whittington; Cllr Martin Forshaw; Cllr David Westley; and Cllr Paul Greenall.

Copy: David Crompton; Nick Eckersley (NRE Surveyors); and Roger Lancaster (Kings Chambers).