

Fylde Local Plan Examination

Stage 2 Hearings

Matter 7 The Economy - Site Allocations and Delivery
Policies SL2 and EC1 (ES4 and ES6)

Hearing Statement on behalf of Telereal Trillium

Representor No. 61

June 2017

1 Introduction

- 1.1 This Hearing Statement is submitted on behalf of Telereal Trillium in connection with the proposed allocation of its residual landholdings at the Blackpool and Fylde Industrial Estate, Whitehills and at Brunel Way, Whitehills.
- 1.2 It responds to relevant questions set out in Matter 7 of the Inspector's Matters, Issues and Questions for the Stage 2 Hearings dated the 15th May 2017, and should be read in conjunction with the preceding representations submitted to the Publication version of the Local Plan on behalf of Telereal Trillium in September 2016.

2 Matter 7: The Economy - Site Allocations and Delivery

Issue Does the Plan set out a positively prepared strategy for the delivery of economic development (Employment, Retail Centres, Leisure Culture and Tourism Development) within Fylde that is justified, effective and consistent with national policy?

Site Allocations - Policies SL1 - SL4 and EC1

Q48 Are these policies up-to-date with regards to the allocation of employment sites? Is there justification for the allocation of any other sites (such as land SW of junction 3 of the M55, Corner Hall Farm)?

- 2.1 No comment

Q49 Is Policy EC1 allocating sites and if so should it state this? Does the policy duplicate allocations set out in Policies SL1 - SL4?

- 2.2 Policy EC1 is a site allocations policy crossed referred to the Policies Map, which makes provision to meet the net residual business and industrial land requirement of 62 ha for the Plan period identified in Table 3 of the policy supporting text. There is duplication with Policies SL1 - SL5 which also allocate the same employment sites, together with housing and mixed-use sites within each Strategic Location and at the Non-Strategic Development Site locations.
- 2.3 The Plan might benefit from clearer explanation / simplification between the purpose of Chapter 7 and Chapter 9 but the duplication is not detrimental to the document.

Q50 Is the methodology for site assessment and selection robust and justified?

- 2.4 No comment

Q51 Are the proposed site allocations justified and deliverable? Is there justification for some sites to be removed from the policies (such as ES1)?

- 2.5 Telereal Trillium does not agree that development of its land identified as Site ES4 on the draft Policies Map, should be limited to Class B1, B2 and B8 employment development as proposed in draft Policy EC1 and Policy SL2.
- 2.6 The site forms the northwest corner of the central core of land within the Whitehills Local Service Centre, and lies immediately adjacent to the proposed mixed housing and employment allocation MUS1. There is no obvious reason for annexing Site ES4 from MUS1 other than rolling-forward the extant employment allocation from the current Local Plan without review.
- 2.7 This is a missed opportunity as;
- a) the land has never been developed for more than 20 years throughout the previous local plan period, and Paragraph 22 of the Framework advises that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose, in favour of more beneficial alternative uses, and;
 - b) the land lends itself to being beneficially included as part of the MUS1 allocation so that there is a greater prospect of it being developed and not left sterilised and unused. The land shares a strong physical connection with MUS1 which does not extend solely to the south of parcel ES4 on the opposite side of Old House Lane, but it bridges Old House Lane and extends onto the land immediately east of ES4.
- 2.8 Telereal Trillium therefore requested that Site ES4 should be incorporated within MUS1 to allow the land to be used to its maximum potential as part of a wider master-planned development that will be commercially viable and attractive to the market, and will thereby offer much greater certainty and likelihood of delivery.
- 2.9 This has not happened, and since the submission of the representations by Telereal Trillium, the Council has resolved to approve outline planning application (ref. 15/0114) for Site MUS1 on the 11th January 2017 subject to a S106 agreement. This is for mixed use development of up to 265 dwellings and 1.5 ha of employment development (Classes B1, B2 and B8) with all matters reserved except access. The committee report and illustrative masterplan for the application are attached at Appendices 1 and 2 to this Statement.
- 2.10 The proposed mix of residential and employment uses is considered on page 18 of the officer committee report (Appendix 1). This confirms that the mix of land uses is considered acceptable and the employment parcel is appropriately located to the south of the residential

area adjacent to existing employment uses. The shortfall of employment land against the expected yield of Site MUS1 in draft Policies SL2 and EC1, is also justified on the basis that the site is constrained by an overhead powerline easement, existing development and the need for landscaped buffers between residential and employment uses.

- 2.11 Telereal Trillium understands that the S106 agreement is nearing completing and once granted, the outline planning permission will then be a material consideration influencing the development of Site ES4. The illustrative masterplan (Appendix 2) showing the likely distribution of uses within Site MUS1, shows there is no proposed landscape buffer along the boundary with Site ES4 compared to the extensive buffers with the employment land to the south. Developing Site ES4 for B1, B2 and/or B8 employment uses is therefore now likely to be incompatible with the (pending) committed development on Site MUS1. It is also doubtful that the fragmented nature of Site ES4 by reason of existing development, the overhead powerline easement and the need for sufficient landscaping to screen it from the adjacent approved residential development, will prevent its delivery for employment uses. Telereal Trillium therefore considers that taking account of the changed circumstances affecting Site MUS1, its land forming Site ES4 should be removed from the schedule of proposed employment land allocations in Policies SL2 and EC1, and the site should be reallocated for housing.

Q52 Policy EC1 lists appropriate use classes for each site - are these justified and effective? Is there justification for some sites to be allocated for other uses (such as sites MUS2, ES4, ES5, ES6)? What is the purpose of including the term 'where unacceptable harm is not caused, the following uses will be permitted.....' when appropriate uses are already listed within the policy?

- 2.12 In the event Site ES4 is retained as a proposed employment site allocation and is not reallocated for housing development, Telereal Trillium considers that it and Site ES6 on the north side of Brunel Way, should be able to accommodate a wider range of employment / commercial uses and not be restricted to solely Class B1, B2 and B8 uses. There are two reasons for this;
- a) Telereal Trillium owns Peel Park, which includes Sites ES4 and ES6, and comprises the 13,600 sqm Government Offices building accommodating the DWP Head Office and its annex, and the surrounding serviced land and car parks. Following the on-going rationalisation of the civil service estate in Fylde and Wyre and the transfer of staff, the DWP office at Peel Park is the largest employer in Whitehills and will remain to be a major, and increasing, generator of investment and expenditure in the area. Telereal Trillium therefore wishes to ensure that the economic development potential of its remaining land asset at Peel Park is therefore maximised and tailored to attract compatible,

supplementary and complementary uses that will not prejudice the continued occupation and future expansion of the DWP and its Agencies.

The Company does not consider that the high quality 'business-park' nature, location and means of access to its remaining land, is therefore suitable for conflicting light industry Class B1(c), general industry B2 and/or distribution B8 uses.

- b) Secondly, Telereal Trillium considers that limiting the potential of Sites ES4 and ES6 to Classes B1, B2 and B8 development overlooks a number of other employment-generating uses that will add to the overall critical mass of the Whitehills Local Service Centre as a strategic employment location. These could include a range of complementary / ancillary uses such as conference facilities, hotels, an improved food and drink / hospitality offer, certain types of retail / showrooms, private and public health and education development (Classes A1, A3, C1, D1 and D2 and Sui Generis uses).

- 2.13 This wider range of uses would serve to strengthen the Whitehills area and local economy, by supporting the existing uses in the area and/or by diversifying the range of businesses and activity / critical mass, and thereby improving its function as a strategic employment / business destination on the M55 corridor, and a place to live and work.

Q53 Where Policy EC1 refers to alternative uses for allocated and existing sites should cross reference be made to other Plan policies such as Policies GD7 and GD8?

- 2.14 No comment

Q54 Is it effective to list existing employment sites in Policy EC1? Is the list justified, based on up-to-date evidence and in accordance with paragraph 22 of the Framework? Are all sites still active employment sites or is there justification for some sites to be removed from the list (such as Mythop Lodge)? Is the list consistent with Appendix 6 as referred to in paragraph 9.17?

- 2.15 No comment

Appendices

Appendix 1 Officer Report for planning application ref. 15/0114 presented to the Development Management Committee on the 11th January 2017

Appendix 2 Proposed Illustrative Plan (Option 4 Rev A) for planning application ref. 15/0114 resolved to be approved subject to completion of a S106 agreement

Appendix 1

**Officer Report for planning application ref. 15/0114 presented to the Development
Management Committee on the 11th January 2017**

Appendix 2

**Proposed Illustrative Plan (Option 4 Rev A) for planning application ref. 15/0114
resolved to be approved subject to completion of a S106 agreement**