

Regulation 19 Consultation
Planning Policy Team
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14th April 2025

Dear Sir/Madam

**Central Lancashire Local Plan Regulation 19 Consultation
Cottam Brickworks, Tom Benson Way, Cottam, Preston
Representation on behalf of Cottam Hall Properties Limited**

Thank you for the opportunity to comment on the Publication Version of the Central Lancashire Local Plan (CLLP).

Cottam Hall Properties Limited has an interest in all strategic and non-strategic matters informing the preparation of the Local Plan. However, these representations are made specifically in the context of land at Cottam Brickworks, Cottam.

Cottam Hall Properties Limited (CHPL) own the former Cottam Brickworks site which is identified in the draft Local Plan and on the Proposals Map as a District Centre.

These representations relate to the tests of soundness set out at Paragraph 36 of the National Planning Policy Framework ('NPPF') (December 2024), to which the CLLP relates.

Specifically, whilst CHPL are supportive of the overall objectives of the Local Plan to deliver sustainable growth and in particular the identification of Cottam Brickworks, a brownfield site, as a development opportunity, CHPL must object to the proposed approach to Cottam Brickworks as neither justified in the light of relevant evidence nor will it be effective in supporting the delivery of appropriate development on the site and the achievement of some key objectives.

Local Plan Allocations

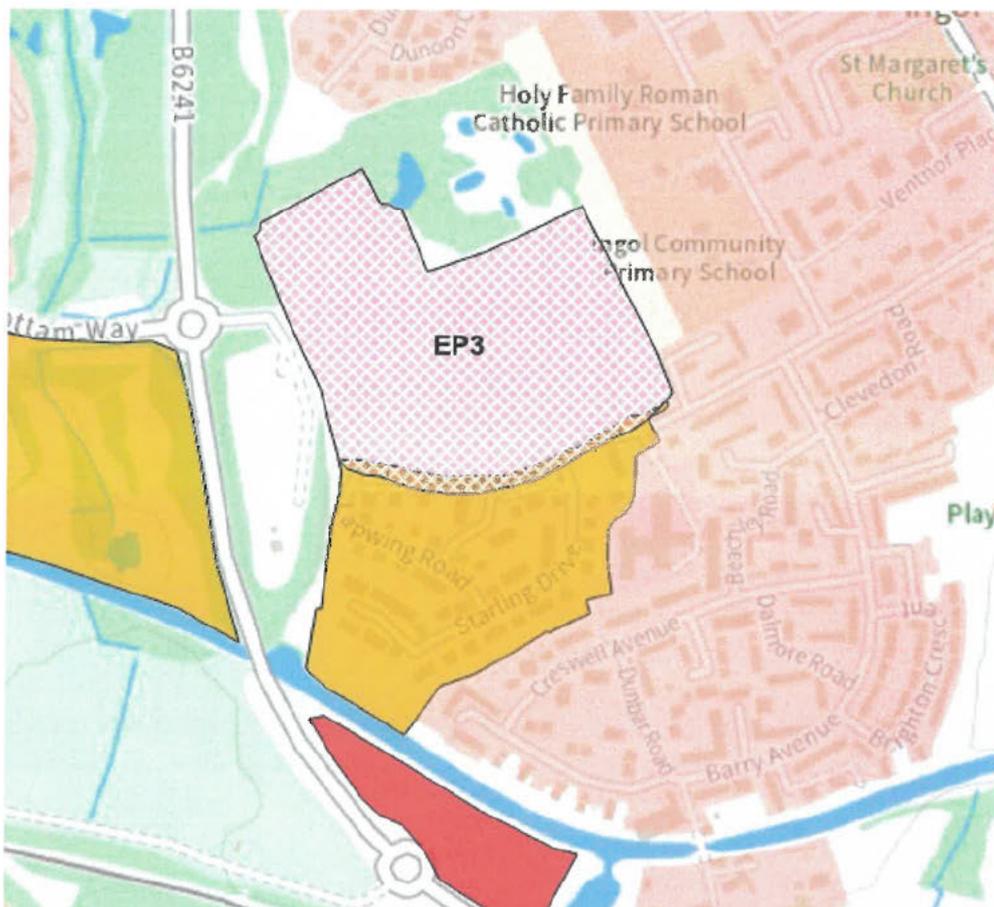
Cottam Brickworks has been identified for development for many years and specifically since 2006, as part of the publication by the City Council of the Interim Planning Statement 1 – Cottam Development Area.

Cottam Brickworks is identified in the current Preston Local Plan (2015) as a District Centre under Policy EP3. The policy states that:

'Within the proposed Cottam District Centre, situated on the Former Cottam Brickworks site, as defined on the Policies Map, mixed use retail and commercial development that supports the role and function of the District Centre will be permitted.'

Policy MD1 Cottam, considering the development of the wider Cottam area, also refers to:

'the provision of a range of uses appropriate to a major residential area, including a District Centre'



Preston Local Plan Proposals Map (extract)

The policies of the Local Plan 2015 are intended to be replaced by the CLLP. Policy MD1 is not being carried forward and Policy EP3 Cottam District Centre is to be replaced by Policy EC11 Town Centre Hierarchy.

Cottam is listed as a District Centre in draft Policy EC11. The draft policy states that:

'3. Retail and other appropriate main town centre uses should be located in the above Centres, proportionate to the size and function of the Centre and its position in the town centre hierarchy.'

4. Within the Primary Shopping Areas of Preston City Centre, Chorley and Leyland Town Centres and the whole of District Centres, the loss of ground floor retail uses will be supported where:

- a) following a suitable period of appropriate marketing, there is no realistic prospect of maintaining a retail use at the ground floor; and
- b) the vitality and viability of the Primary Shopping Area or District Centre will be unaffected; and
- c) an 'active street frontage' would be retained where possible; and
- d) the proposals would not be detrimental to the character of the Centre in other respects.

5. Residential and office development will be supported at upper floors within the Centres, subject to compliance with other Plan policies.

At paragraph 5.39 the explanation to the policy states:

Within District and Local Centres, the scale of development should be proportionate to the size of the centre, strengthening their roles in providing mainly convenience shopping and services to meet local needs. A new District Centre will be provided at Cottam and new Local Centres will be delivered at Pickering's Farm, and North West Preston. Preston West is also required to provide a District and/or Local Centre.

The draft Proposals Map includes the same area for the Cottam Centre as show in the Preston Local Plan. This is an extensive area, which far exceeds the land required to deliver the level of commercial floorspace which could realistically be brought forward in this part of the authority area.

It is also useful to refer to the Central Lancashire Retail and Town Centres Policy Advice document, published in February 2025

In considering Cottam Centre, the document states at paragraph 5.52 that:

'...it is unclear whether a wider range of commercial uses as currently referred to within the adopted Local Plan would be supported in the area and as such, sufficient flexibility should be applied in terms of the overarching provision of the centre and the allowance for a wider range of uses should appropriate market testing dictate as such.'

Planning and Development History

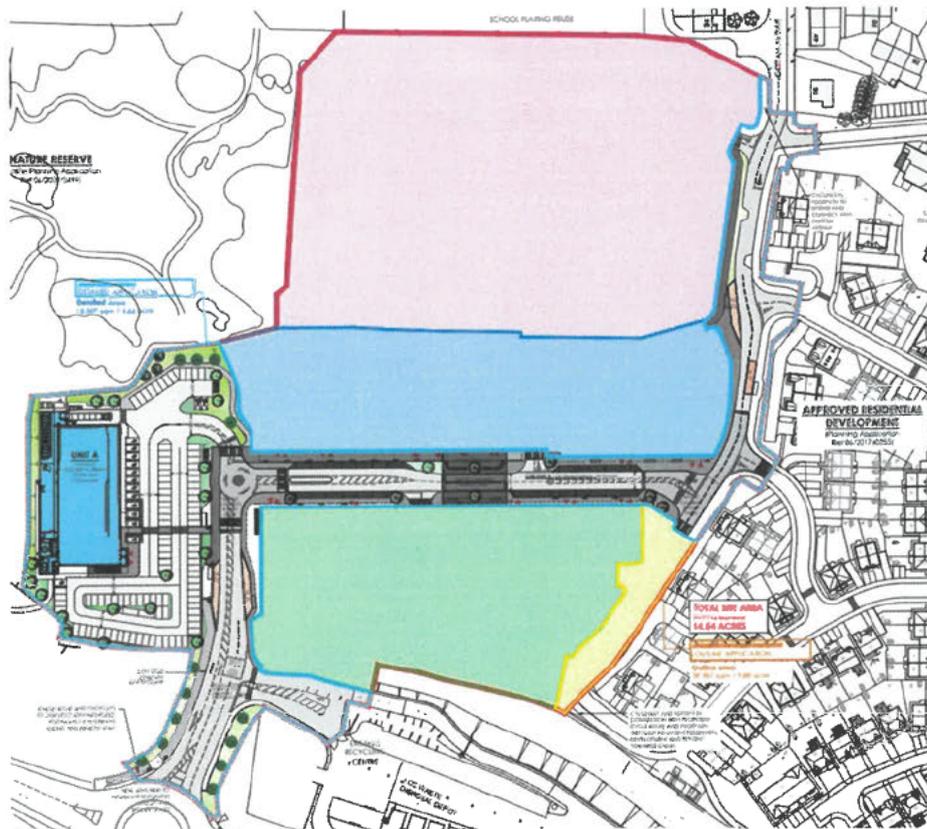
Whilst the site has been identified for a number of years, ground conditions, infrastructure requirements, land ownerships, market conditions, viability and the relationship of the proposed access off Tom Benson Way to the adjacent Household Waste Recycling Centre (HWRC) and the approach of Lancashire County Council as the HWRC site owner, has made development challenging.

Notwithstanding that, elements of the original Cottam Brickwork project have been delivered, namely Lady Elsie Finney House Care Home, land now forming part of the Dobcroft Nature Reserve and the delivery of 114 new homes off Cottam Avenue.

However previously proposed retail and associated commercial development has not as yet come forward.

A hybrid permission (ref 06/2009/0499) granted in 2012, for a 4,366 sq m foodstore, petrol filling station, an outline scheme for offices (and the Nature Reserve and the bulk of the housing referred to above) has been implemented in part, but the retail and commercial elements have not come forward.

A further hybrid application (06/2019/1451) was approved in 2020 comprising full permission for a retail foodstore (1,785 sqm); the delivery of an access from Tom Benson Way and link through to Cottam Avenue; outline approval for up to 11,425 sqm of flexible use commercial floorspace for A1, A2, A3, A4, B1, C3 and D1 uses; up to 229 car parking spaces; and up to a further 89 no. residential dwellings to the north of the site. This application has been subject to a s73 approval (06/2022/1157) which remains live.



S73 approved parameter plan

Market and Development Prospect and Revised Proposals

The site has been actively marketed following the 2020 approval and a discount food retailer is seeking to deliver the foodstore, working with CHPL. This is intended to be delivered in the short to medium term. Similarly, there is strong market interest in the housing element which again is to be progressed in the short to medium term.



However, no substantive interest has been expressed in the remaining outline commercial elements. Market appraisal work recently undertaken on behalf of CHPL by Savills (a copy of which is attached) suggests that Preston and the Cottam area are well provided for in terms of food, non-food retail and most leisure sectors and that the scale of commercial development envisaged in the s73 approval will be very challenging to secure and is likely unviable. The lack of profile to the wider site (other than the retail foodstore at the northern end of the site), is considered a further constraint on market interest, along with the delivery of a range of smaller centres and wider commercial provision in the local area. Savills however suggest that a small 'terrace' of retail units may well be able to sit alongside the food store proposals.

Accordingly, whilst the approved foodstore and housing will be delivered as initial phases of the s73 approval, it is likely CHPL will need to revisit and revise the remaining commercial element of the scheme to bring forward deliverable proposals. Whilst these proposals are as yet to be prepared it is considered that, given market conditions and development requirements, they will comprise significantly reduced commercial uses (flexible use comprising Class E uses) and car parking (potentially to the south of the access road from Tom Benson Way, opposite the proposed foodstore) with the remainder of the area given over to a residential led scheme, including potentially specialist and later living housing. As such, there is a requirement for sufficient flexibility to be provided for within the CLLP in terms of the types of uses and scale of the proposal to be provided for, to ensure a viable scheme can be delivered by CHPL.

Proposed Modifications to the CLLP

The CLLP currently designates a large area at Cottam for the delivery of a district centre, with no definitive boundary for the commercial uses. CHPL consider it is important to ensure that greater clarity is brought to the matter and the extent of retail and commercial uses more clearly defined, reflecting market conditions and to enable those parts of this brownfield site that will not come forward for retail/commercial uses to be used for residential development.

It is therefore considered that a revised approach to Cottam Brickworks is justified in the context of the evidence available and will be more effective in delivering key objectives for the site, namely:

- It will support the delivery of a food store and potentially some small-scale retail and commercial uses, creating jobs and providing access to local services, complementing existing provision.
- It will contribute towards meeting housing needs on a brownfield site;
- It will assist in delivering a key linkage between Cottam Avenue and Tom Benson Way improving connectivity in the local area and promoting active travel;
- It will facilitate the delivery of the site, unlock infrastructure investment.

It is not considered that this revised approach will be detrimental to the overall strategy for the Cottam area and the provision of retail and other facilities for the local community. As the site has not come forward as planned, retail and other developments have come forward in the wider Cottam area to meet the needs of the growing population and have indeed captured investment and operators whom may otherwise may have been accommodated at Cottam Brickworks (if other constraints had been overcome). There is of course still a commitment by CHPL to bring forward the approved food store on the site, making an important contribution to meeting local need.



CHPL therefore consider that the extent of the allocation of Cottam Brickworks is no longer justified or effective.

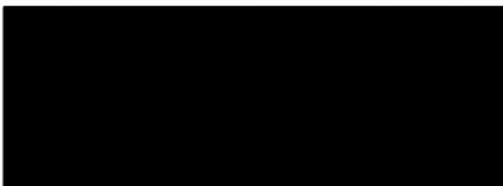
It is considered that alternatively the site of the proposed foodstore and potentially an additional, limited area of the site could be identified either as a District or Local Centre and the remainder of the site identified as a residential development site (approximately 4 ha, 180 units), under Policy HS4 Housing Allocations Preston, with the scope for specialist and later living accommodation. This approach is indicated on plan Ref: 15801 THPW XX XX DRA 1000 attached to this representation.

Revising the boundaries of the centre would of course also reflect the already approved housing development on a substantial part of the site.

An alternative approach would be to allocate the whole site as a Mixed Use site for residential and Local / District Centre uses comprising approximately 180 dwellings, a foodstore (approximately 2,000 sq. metres) and complementary small scale retail and commercial uses, subject to viability.

We trust these comments are helpful and will be considered by the planning authority in the submission of the CLLP. Clearly, we would be happy to work with the planning authority on an appropriate proposed modification to the draft Plan to accommodate our proposed changes and so we look forward to hearing from you.

Yours faithfully



John Clarke

Director

Cottam Hall Properties Ltd