

Central Lancashire Local Plan 2023-2041

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
(ENGLAND) REGULATIONS 2012



Regulation 19 Pre-Submission Plan

REPRESENTATION FORM

The easiest way to submit your comments is online at <https://centrallocalplan.citizenspace.com/planning/cllp-regulation-19-representation-period/>. Alternatively, you can scan the QR code on the right, using a smartphone, to be taken to the webpage. **We would encourage you to use the online form wherever possible.** Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



Submission form

This form has two parts-

Part A – Personal Details: need only to be completed once. **We will not be able to accept responses where personal details are not provided.**

Part B – Your representation(s): Please fill in a separate sheet for each representation you wish to make relating to each individual policy.

You will be asked to give details of why you consider the policies of the Local Plan to be sound or unsound, please be as precise as possible. You will also be asked to set out the modification(s) you consider necessary to make the Local Plan policies sound in respect of any soundness matters you have identified. You will need to say why each modification will make the policy sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Privacy Notice

If you have any questions about how the Central Lancashire Authorities will handle your personal data, please see our Data Protection Policy Statement or contact us via email at centrallancashireplan@chorley.gov.uk

- Chorley Privacy Statement: <https://chorley.gov.uk/privacy>
- Preston Privacy Statement: <https://www.preston.gov.uk/article/1231/Data-protection-policy-statement>
- South Ribble Privacy Statement: <https://southribble.gov.uk/privacypolicy>

Part A: Personal Details*

We will not be able to accept responses where personal details are not provided.

1. Please provide your contact details.

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) in the Person Details boxes below but complete the full contact details of the agent in Agent Details.*

	Representor Personal Details	Agents Details (if applicable)
Title	Miss	
First Name	Georgina	
Last Name	Cox	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	Gladman Developments Ltd	
Address Line 1	[REDACTED]	
Address Line 2	[REDACTED]	
Town	[REDACTED]	
Postcode	[REDACTED]	
Telephone number	[REDACTED]	
[REDACTED]	[REDACTED]	
What authority do you live / work in? (Chorley, Preston, or South Ribble)	[REDACTED]	

Part B: Please use a separate sheet for each representation you wish to make

Name or Organisation:

Gladman Developments Ltd

3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.

If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

Comment being made against:	Reference (please provide)
Policy:	Please see attached representation
Paragraph:	^
Development Site:	^
Policies Map:	^
Evidence:	^
Other (Please state):	

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3) Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Central Lancashire Local Plan does not comply with).

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Plan does not have an evidence base supporting why the chosen housing requirement has been applied, nor has the plan been positively prepared to meet the Local Housing Need across the authorities, the housing requirement figure has been picked to merely attempt to meet transitional arrangements which was not the purpose of the revised NPPF (2024) aiming to aid housing delivery. Please see the attached representation for further comments.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Gladman propose the plan is not submitted for examination, and the plan is to commence plan-making working towards the revised NPPF (2024) guidance and positively plan to meet housing need throughout Central Lancashire.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	Please check the relevant box
No, I do not wish to participate in hearing sessions	<input type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Gladman have key arguments to make regarding the housing requirement determined in the publication plan, alongside the lack of an up-to-date evidence base for the changes made to the Areas of Separation on land which was deemed to having no contribution in the previous and the emerging plan's most current evidence base in 2022.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Third Floor, Town Hall, Lancaster Road, Preston, PR1 2RL by filling in this representation form.

Forms must be received by midnight on Monday 14 April 2025.





Central Lancashire Local Plan

Regulation 19 Consultation

April 2025



[gladman.co.uk](https://www.gladman.co.uk)



01260 288888

Page intentionally left blank

CONTENTS

1	Introduction.....	6
1.1	Context.....	6
	Duty to Cooperate	7
	Timescales for the Submission of the LPR for Examination.....	8
2	Legal Compliance.....	10
	Sustainability Appraisal	10
3	National Planning Guidance.....	12
3.1	National Planning Policy Framework	12
3.2	Written Ministerial Statement.....	13
4	CLLP Reg 19 Publication Consultation.....	14
4.1	Vision, Objectives and Spatial Strategy.....	14
	Spatial Vision and Objectives.....	14
	Policy SS1: Development Patterns (Spatial Strategy)	14
	Policy SS2: Settlement Hierarchy.....	15
	Broughton	15
	Goosnargh	16
4.2	Balanced Housing Market.....	17
	Policy HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements.....	17
	Housing requirement.....	17
	Housing Supply.....	19
	Summary.....	20
	Policy HS4: Housing Allocations Preston.....	21
4.3	High Quality Environment.....	22
	Policy EN1 (Strategic Policy): Well Designed Places.....	22
	Policy EN5: Green Infrastructure	22
	Policy EN6: Biodiversity Net Gain	22
	Policy EN15: Areas of Greenbelt	23
	Policy EN17: Development in the Open Countryside.....	23
	Policy EN18: Areas of Separation	24

4.4	Climate Change and Sustainable Energy	26
	Policy CC1 (Strategic Policy): Climate Change & Policy CC3: Reducing Energy Consumption.....	26
5	Site Submissions	28
5.1	Land East of Garstang Road, Broughton (Preston)	28
5.2	Land off Churchgate, Goosnargh (Preston)	32
6	Conclusion	36
6.1	Summary.....	36
	Appendix 1- Area of Separation report prepared by Randall Thorp	38

1 INTRODUCTION

1.1 Context

1.1.1 This submission provides Gladman Developments Ltd (Gladman)'s representations to the Central Lancashire Local Plan (CLLP) Regulation 19 consultation.

1.1.2 Gladman has fully engaged in the preparation of the CLLP to date, having most recently submitted representations on the regulation 18 consultation in February 2023. Gladman are promoting two sites in the plan area for residential-led development and full site submissions are included within this representation at Section 5. All these sites are available, suitable and deliverable.

1.1.3 Gladman consider the CLLP fundamentally unsound in its current form. As outlined in detail in this representation, it is evident that progress of the CLLP has been accelerated so that it proceeds under the previous National Planning Policy Framework (2023) ('Framework') to evade the increased local housing need (LHN) introduced by the revised standard method. As a result, the proposed housing requirement is inadequate and will not address the actual housing needs of the area and will also stymie economic productivity and development ambitions in Central Lancashire as a result.

1.1.4 The Government has emphasised its position that local authorities should not be submitting deficient plans for examination believing the Planning Inspectorate will use significant time and resource to address fundamental soundness issues¹. Given our concerns in respect of both the severity of soundness issues and failure to evidence comprehensive cooperation, Gladman assert that the CLLP should not be submitted for examination and the Central Lancashire Councils should revise the CLLP to account for the area's full housing need.

1.1.5 Another significant objection is the unjustified decision to remove the draft allocation of land East of Garstang Road, Broughton. Whilst the SHLAA assessment of the site now says that the site is not suitable for development due to sitting in the Open

¹ SoS letter to The Planning Inspectorate 20th July 2024.

Countryside and Area of Separation (AoS), however, the evidence base in support of the plan still supports the inclusion of the site for development. The site is now included in an extended Area of Separation, and we have commissioned consultants Randall Thorp to review this designation (Appendix 1) That report concludes that land East of Garstang Road does not contribute to the AoS. Gladman therefore submit that the allocation of this site should be reinstated.

Duty to Cooperate

- 1.1.6 The Duty to Cooperate (DtC) requires local authorities to cooperate with other local authorities and other public bodies in preparing and developing development plan documents and other local development documents so far as it relates to a strategic matter. It is a process of ongoing engagement and collaboration intended to produce effective policies on cross-boundary strategic matters.
- 1.1.7 Paragraphs 24–28 of the Framework emphasise the need for local planning authorities to maintain effective cooperation during the plan-making process. It provides that this is integral to the production of a sound plan, one that is positively prepared and with a justified strategy for managing growth and meeting identified needs for development, including housing and infrastructure.
- 1.1.8 The Framework sets out how local plan authorities are expected to cooperate, including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist.
- 1.1.9 Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with.

1.1.10

- 1.1.11 The CLLP Regulation 19 consultation is supported by an Interim Duty to Cooperate Statement which outlines the approach taken to date for DtC between Central Lancashire and neighbouring authorities. Paragraph 4.0.1 states that the DtC is an ongoing process that will continue through the Regulation 19 consultation and other plan preparation stages. Gladman note that strategic matters relating to the preparation of the CLLP were most recently discussed with neighbouring authorities in November 2024, prior to the publication of the new Framework in December 2024.
- 1.1.12 The introduction of the new Local Housing Need (LHN) figure has seen significant increases in housing need requirement across neighbouring authorities. These changes have and will continue to impact the ability of neighbouring authorities to demonstrate a five-year housing land supply.
- 1.1.13 Whilst the monitoring and five-year housing land supply statements for the various neighbouring authorities are awaited, the implications of the uplift in LHN are apparent. For example, West Lancashire Borough Council (WLBC) have recently had their housing land supply position confirmed at 2.5 year as a result². Accordingly, the Central Lancashire Authorities should conduct further DtC meeting with neighbouring authorities to discuss the implications of the LHN at a strategic level and to reconsider their approach to cross-boundary strategic housing delivery including the potential for the CLLP to take on unmet need for neighbouring authorities.
- 1.1.14 The example of WLBC is particularly pertinent given that South Ribble have recently demonstrated an initial preferred local authority reorganisation structure comprising South Ribble, Chorley and West Lancashire³.

Timescales for the Submission of the LPR for Examination

- 1.1.15 The Spring 2024 LDS confirms the CLLP will be submitted for Examination in Public by June 30th 2025, despite the Regulation 19 consultation only concluding on the 14th April 2025. Gladman question the ability for representations to be thoroughly reviewed within this tight timeframe and for, any modifications to be considered or

² APP/P2365/W/24/3350235

³ [Local Government Reorganisation and Devolution - Council report new.pdf](#)

for any outstanding/additional evidence to be finalised. The CLLP therefore appears to have been published fait accompli and consequently Gladman would question whether appropriate consideration will be given by the Council to the outcome of this consultation.

2 LEGAL COMPLIANCE

Sustainability Appraisal

- 2.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.1.2 The CLLP is supported by an Integrated Impact Assessment (IIA). The IIA is an assessment process designed to consider and report upon the significant sustainability issues and effects of the CLLP's strategy and its policies, while considering the alternative options for development and growth across Central Lancashire.
- 2.1.3 The SA within the IIA should ensure that the results are clearly justified in the publication version of the CLLP and its policies. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the local plan decision-making and scoring should be robust, justified and transparent.
- 2.1.4 Gladman's primary concern with the IIA relates to housing need and the assessment of the varying housing quantum. Of the varying scenarios tested through the IIA the highest figure tested is 1,275 dwellings per annum, or 76% of the new stock based annual housing requirement. The figure supported through testing of the IIA does not meet the transitional arrangements as set out in the December 2024 NPPF.
- 2.1.5 Paragraph 4.7 of the report goes on to state:

The Councils considered that a range of indicators continued to comprehensively support the conclusion that housing need within Central Lancashire exceeds the result

of the Government's Standard Method (pre-December 2024) and intended to take forward Option 3. Following publication of the updated NPPF in December 2024, the annual housing requirement for Central Lancashire has been increased slightly to 1,314 dwellings per annum in order to achieve 80% of the local housing need using the new standard method formula, in accordance with the transitional arrangements.

- 2.1.6 This is not the government's intention of the transitional arrangements for plan making. The Council should have tested varying scenarios of meeting the new stock-based housing requirement and not applied an arbitrary uplift to meet the 80% figure.
- 2.1.7 The IIA provides no evidence or justification for the increase of 77dpa other than to meet the transitional arrangements and does not explain why the arguments for adopting a higher housing requirement figure are not supported. It highlights the flaws in the approach pursued by the Councils. This matter is considered further in this representation.
- 2.1.8 As currently set out, the IIA does not support the housing requirement being progressed within the publication Local Plan.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 The Framework sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The Framework requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

3.1.2 Paragraph 36 of the Framework⁴ sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which, at a minimum, seeks to meet objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement on common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statement of national planning policy, where relevant.

3.1.3 The Framework reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the future areas which they are

⁴ December 2024 version

responsible for, to provide a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

- 3.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the CLLP provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

3.2 Written Ministerial Statement

- 3.2.1 The need to plan for the sufficient delivery of homes is affirmed in the Written Ministerial Statement (WMS) given by the Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government, Angela Rayner on 30 July 2024, in addition to the recent consultation on proposed revisions to the Framework and other changes to the planning system.

- 3.2.2 The WMS reaffirms that the country is in *"the most acute housing crisis in living memory"* and is clear in its conclusion that *"there is no time to waste. It is time to get on with building 1.5 million homes"*. These are now material considerations for plan making and decision making and clearly set the tone and direction of the newly elected Government.

4 CLLP REG 19 PUBLICATION CONSULTATION

4.1 Vision, Objectives and Spatial Strategy

Spatial Vision and Objectives

- 4.1.1 In principle, Gladman support the Local Plan's vision and objectives relating to the delivery of high-quality sustainable new housing and supporting infrastructure to meet community needs. However, Gladman suggest that the CLLP emphasise the intrinsic relationship between delivering local housing need (LHN) and economic growth aspirations.
- 4.1.2 The Office for Budget Responsibility (OBR) forecasts, published 26th March 2025, anticipates 0.2% to be added to GDP by 2029/30 because of recent planning reforms. This is expected to result in an injection of a £6.8bn into the economy, of which £3.4 billion is reported to be directed towards improvements for public services. The publication specifically references the relationship between this significant economic forecast and the reintroduction of mandatory housing targets through the December 2024 publication of the NPPF. The economic benefits of Plans to meet or exceed LHN are therefore clear and should be made so in this Plan.

Policy SS1: Development Patterns (Spatial Strategy)

- 4.1.3 Gladman support the focus for new housing to be located in the most sustainable locations. However, considering the constraints associated with the plan area (primarily the significant Green Belt coverage around the periphery of settlements to the south of Preston), Gladman draw attention to suitable and sustainable locations for increased housing growth to be north of the Preston urban area.
- 4.1.4 Preston's rural hinterland to the north comprises sustainable settlements, such as Broughton and Goosnargh, with good access to services and facilities, transport connections and employment opportunities, to accommodate housing growth.
- 4.1.5 Gladman finds the wording of parts 3 and 4 of Policy SS1 restrictive. Given the increase in LHN across the plan area, it is imperative that the CLLP does not act as a

barrier to development. However, as currently drafted, the settlement boundaries are tightly drawn around the built form of sustainable settlements, which is considered to restrict their growth.

- 4.1.6 As detailed further in this representation, there is generally an inherent element of uncertainty surrounding the proposed timescales for the delivery of proposed allocations, particularly on large strategic sites and challenging brownfield sites. Therefore, greater flexibility is required to improve the deliverability of housing in the CLLP and to ensure a robust supply of deliverable housing land can be maintained.
- 4.1.7 This representation provides a number of suggestions to improve the effectiveness of the CLLP's spatial strategy and policies to ensure that the scale of homes that are delivered over the plan period correspond with government house building objectives.
- 4.1.8 An assessment of the proposed Area of Separation is addressed in relation to Policy EN18 and within a supporting report prepared by consultants Randall Thorp (Appendix 1).

Policy SS2: Settlement Hierarchy

- 4.1.9 Gladman object to the placement of Broughton and Goosnargh in the Settlement Hierarchy, particularly given recent, committed and forthcoming development and infrastructure improvements at these settlements.
- 4.1.10 Broughton is identified as a 'Rural Local Service Centre (Tier 4)' and Goosnargh within the tier of 'Smaller Rural Villages and Hamlets (Tier 5)'.

Broughton

- 4.1.11 Paragraph 3.21 describes Tier 4 settlements to: *'have a more rural feel and fewer facilities and services available, serving their own residents and those in nearby villages with basic services. Good access to services is important if rural communities and the rural economy are to survive and prosper.'*
- 4.1.12 Broughton is strategically located west of the M6 and north of the M55 and A6 enabling good access into the Preston City Centre and other strategic economic

locations including Manchester. It has also been subject to significant highway connection improvements through the construction of the James Towers Way, together with wider improvements to its centre, which has enabled the development of further housing and leisure facilities. It benefits from a secondary school, which is rare for a settlement of its size. It is therefore considered a flourishing and attractive location for future housing growth.

- 4.1.13 It is for the above reason that growth should not be allocated solely based on the size and scale of the settlement, and rather the plan should consider the wider strategic links of settlements to better distribute growth across Preston and Central Lancashire. Policy SS2 should therefore be amended so that Broughton is defined as a Tier 3 Urban Local Service Centre.

Goosnargh

- 4.1.14 The CLLP affords Goosnargh a reasonably significant scale of development through draft allocation HS4.1, which forms the remaining part of the former Whittingham Hospital development site. The original outline planning permission⁵ at the site secured permission for 750 dwellings and supporting infrastructure in September 2020.
- 4.1.15 Reserved Matters have since been granted for up to 269 dwellings and community infrastructure⁶ across the development site. Many dwellings forming part of these applications are now occupied, and construction of further dwellings and infrastructure is at an advanced stage. There is a pending Reserved Matters application⁷ for a 477 dwellings at the site on the part of the site which forms draft allocation HS4.1.
- 4.1.16 An application for a new primary school and SEN⁸ at the former Whittingham Hospital site is also currently pending determination. Additional community infrastructure to come forward on this site, includes the erection of a new purpose-built sports and

⁵ 06/2019/0365

⁶ 06/2020/118 / 06/2021/1003 / 06/2024/0313

⁷ 06/2025/0008

⁸ LCC/2025/0002

social club building with ancillary steward's residential accommodation, associated outdoor facilities and ancillary buildings, including: a Multi-Use Games Area, Senior Football Pitch (11 a side), retention of existing bowling green, an outdoor events/caravan/camping area, and a camping/caravan site with associated car parking and landscaping

- 4.1.17 Given the sustainability of the settlement, alongside its future growth through committed housing and infrastructure development, Goosnargh, is considered incomparable to other Tier 5 Settlements, as many provide none or very few services and facilities for the day-to-day needs of their residents. Policy SS2 should therefore be amended so that Goosnargh is defined as a Tier 4 Rural Local Service Centres and further growth should be directed to the settlement.

4.2 Balanced Housing Market

Policy HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements

Housing requirement

- 4.2.1 Gladman have significant concerns about the way that the housing requirement has been arrived at. For the reasons outlined below, the housing requirement is insufficient, and additional development should be planned for, which will require the allocation of additional sites in order for the CLLP to be sound.
- 4.2.2 Paragraph 62 of the Framework states that strategic policies should be informed by a LHN assessment conducted using the standard method. However, the transitional arrangements in paragraph 234(a) detail that local plans that reach Regulation 19 on or before the 12th of March, where their draft housing requirement meets at least 80% of LHN, will be examined under the previous version of the Framework.
- 4.2.3 Policy HS1 sets out a proposed housing requirement 23,652 new homes (1,314 dpa). The housing requirement is founded on an employment led scenario which corresponds to 1,237dpa. Paragraph 4.19 of the CLLP Reg 19 consultations states:

Following publication of the revised NPPF in December 2024, the annual housing requirement for Central Lancashire has been increased slightly to 1,314 dwellings per annum in order to achieve 80% of the LHN using the new standard method formula, in accordance with the transitional arrangements. The additional 77 dwellings per annum has been distributed between the three authorities.

4.2.4 Table 1 compares the proposed housing requirement distribution across the three authorities to current LHN standard method figure.

Authority	Employment led scenario (dpa)	Increase applied to meet transitional arrangements (dpa)	Proposed housing need (dpa)	LHN (March 2025) (dpa)	Difference %
South Ribble	450	10	460	554	60%
Preston	500	20	520	617	84%
Chorley	287	47	334	492	93%
Total	1,237	77	1,314	1,643	80%

4.2.5 Firstly, Gladman acknowledge the purpose of the transitional arrangements; however, in this instance, it is disappointing that further sites were not identified to be included in the local plan in order to meet the 1,643 dpa LHN figure and to address the needs across Central Lancashire in the future.

- 4.2.6 Additionally, Gladman question whether the transitional arrangements should be applied in this case at all, as the 80% threshold is only achieved by incorporating an uplift of 77 dpa, for which no clear evidence has been provided to explain or justify the resulting housing requirement.
- 4.2.7 The evidence supporting the plan is clearly using a 2023 NPPF methodology for calculating housing needs, uplifted for economic factors and results in a figure that meets 76% of the new stock-based housing requirement.
- 4.2.8 Through incorporating the arbitrary uplift to this figure the plan creates a conflict within itself as the housing requirement is then based on achieving 80% of the up to date standard method figure as per NPPF 2024, but the plan will be examined under NPPF 2023, which requires the Council to use the previous standard method as the starting point. The evidence base does not support the approach and as such Gladman consider that the transitional arrangements have not been met nor that the proposed housing requirement is justified.

Housing Supply

- 4.2.9 A site-specific housing trajectory is not provided in the CLLP and therefore it is not clear what assumptions the Council have made; at a minimum, a detailed site-specific housing trajectory should be provided, which evidences why the sites relied on can deliver as anticipated.
- 4.2.10 Appendix 3 of the plan confirms that 23,652 new homes are planned to be built over the plan period. The total projected completions are estimated at 25,579, representing a buffer of 7.5% between housing requirement and supply. However, within the local plan consulted on at regulation 18 the supply surplus was 10% of the housing requirement.
- 4.2.11 The reduction of this buffer is concerning, particularly due to the Plan's reliance on large strategic sites to deliver a significant level of homes against the draft requirement, which equates to around 19% of the overall supply. Sites of this nature often experience longer lead-in times and variable build out rates which can significantly slow down the process of delivering new homes.

4.2.12 Gladman would advise that planning for a surplus of more than 7.5% above the requirement for the plan period would provide flexibility in supply, and improve the chances that the housing requirement will be met. Allocating additional small to medium sized sites in sustainable locations is considered a positive and effective strategy to ensure that delivery targets are met.

Summary

4.2.13 On the basis that the proposed housing requirement in Policy HS1 plans for less than LHN, it clearly underestimates housing need for the authority. Moreover, it only achieves the threshold required under paragraph 234(a) of the Framework through the application of an uplift that the council have not justified.

4.2.14 In the absence of any clear evidence to support the proposed housing requirement, Policy HS1 does not presently represent positive, justified or effective plan-making and is therefore unsound. The CLLP has been fast-tracked towards submission to limit growth to the absolute minimum and avoid delivering against LHN, which contradicts the Government's housing delivery objectives.

4.2.15 If the CLLP does proceed to examination under the 2023 version of the Framework, there will be a substantial shortfall in the number of planned for, when compared against the LHN target. In this context, following adoption, it is of fundamental importance that the CLLP includes a specific review policy clearly detailing that the preparation of a new Local Plan to address this sizeable shortfall. The following wording is put forward for consideration:

"A full review of the Local Plan 2041 will immediately follow the adoption of this plan. An updated or replacement plan will be submitted for examination no later than 30 months after the date of adoption of the plan. The replacement plan will secure levels of growth that accord with government policy."

In the event that this submission date is not adhered to, the policies in this Local Plan, which are most important for determining planning applications for new dwellings, will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework."

Policy HS4: Housing Allocations Preston

- 4.2.16 Gladman object to the removal of 'Land off Garstang Road' as a draft housing allocation. The site was included as a preferred housing allocation in the Preferred Options Paper under reference PC/HS1.5, with an expected capacity to deliver up to 110 dwellings.
- 4.2.17 This is followed by the Central Lancashire authorities undertaking an Integrated Assessment (IA) where each site submitted in the Call for Sites consultation was assessed in terms of suitability and deliverability and their potential of having any impacts on the wider environment. The Appendix B of the 2022 IA scored the site positively, with similar conclusion made in the 2025 IIA.
- 4.2.18 The only reasons provided in the CLLP evidence base for discounting the site as a draft housing allocation in the reg 19 consultation is outlined in the SHLEAA (Appendices 1-4) (SHELAA site ref. 19P007), which states that the '*site does not accord with Spatial Strategy - site within AoS and OC.*'
- 4.2.19 Gladman strongly object to this assessment of this site on the basis that it clearly comprises infill development as it does not protrude into the open countryside. Indeed, it is the most logical parcel for the expansion of the settlement.
- 4.2.20 Moreover, although ultimately refused for reasons relating to the principle of development, a previous outline planning application at the site for up to 95 dwellings (ref. 06/2018/1297) was assessed as having no technical or site-specific harm arising from the development and no objections from statutory consultees were received. There have been no material changes in circumstances at the site which would alter this conclusion.
- 4.2.21 Commentary regarding the incorrect placement of the site within an Area of Separation is outlined in the assessment of draft Policy EN17 in this representation and in the supporting report prepared by Randall Thorp (Appendix 1).
- 4.2.22 Gladman do not think that the plan has undertaken a proper and transparent assessment of the alternative site options for housing development. The site assessment completed for the draft allocated sites in the regulation 19 consultation

should include a clear assessment of all sites previously considered as preferred housing allocations in the Preferred Options Paper accordingly.

- 4.2.23 Policy HS4 is therefore unjustified on the basis that it has not properly taken into account reasonable alternatives and is therefore unsound.

4.3 High Quality Environment

Policy EN1 (Strategic Policy): Well Designed Places

- 4.3.1 Gladman consider reference to 'design codes' as included in criteria 4 & 5 of Policy EN1 to represent an unnecessary layer of additional submission requirements for developers, who are already required to prepare and submit a Design and Access statement in addition to any other validation requirements. There is therefore the strong likelihood of unnecessary repetition at additional cost to developers. Should the CLLP wish to ensure any site-specific design aspirations, it would be more appropriate to outline these as key development consideration for allocations.

- 4.3.2 Gladman suggest that criteria 4 & 5 is removed from Policy EN1.

Policy EN5: Green Infrastructure

- 4.3.3 Gladman question the inclusion of criterion 3 (d) on the basis that requirements for the submission of a HMMP and/or LEMP are generally enforced by way of a planning condition or section 106 agreement to ensure that BNG and/or on-site Green Infrastructure is secured. Criterion 3(d) is therefore considered to be an unnecessary arm to the policy and should be removed.

Policy EN6: Biodiversity Net Gain

- 4.3.4 Criterion 2 of Policy EN6 states that: '*Developments must deliver the mandatory Biodiversity Net Gain (BNG) requirement of at least 10%...*'. Gladman support the policy aims which states that all development proposals must achieve 10% BNG over the pre-development site value. However, Gladman do not consider that it is sound to seek a higher percentage of BNG above the statutory 10% on new development

proposals. Planning practice guidance on biodiversity net gain states in paragraph 006 that:

'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development...'

4.3.5 Therefore, any requirements that go beyond 10% BNG need to be clearly justified, and evidence demonstrating the implications of delivering a higher BNG percentage needs to be provided. A higher BNG requirement is likely to require extensive areas of land to be removed from the potential developable area of sites and is not making efficient use of land as a result. Furthermore, the provision of BNG can be incredibly costly and can impact the viability of sites as a result. A 10% BNG ensures that developments leave more biodiversity than was previously the case and is not overly burdensome on developers.

4.3.6 Increasing BNG above and beyond the minimum 10% statutory figure could also impact upon the overall viability of each scheme and its ability to deliver the much-needed housing (including affordable housing) and supporting other social/community facilities required.

Policy EN15: Areas of Greenbelt

4.3.7 Gladman acknowledge that it is the intention for the CLLP to progress under the transitional arrangement, however for decision making purposes this policy will clearly be superseded by the 2024 NPPF policies in relation to inappropriate development in the Green Belt. Policy EN5 should be deleted.

Policy EN17: Development in the Open Countryside

4.3.8 Policy EN17, as currently drafted, only refers to new residential development in the open countryside in the form of replacement dwellings. Gladman would encourage the wording of Policy EN17 to be more flexible and permissive in nature to allow

sustainable residential development to come forward outside of defined settlement boundaries on greenfield sites.

- 4.3.9 The emerging Local Plan has a large reliance on windfall development equating to 12% of the overall housing supply for the plan period. Revising the policy to allow sustainable windfall development to come forward would help to meet the plan area's housing requirement. Furthermore, any housing land supply shortfall could be addressed without the need to depart from the provisions of the CLLP. Critically, the constituent Central Lancashire LPAs would still have the flexibility to refuse a scheme if it was considered to be unsustainable, and would be able to retain more control over development and be less vulnerable to speculative development.
- 4.3.10 Policy HOU5 of the adopted Ashford Local Plan 2030 provides a good example of how this can be implemented in practice. The policy states, "Proposals for residential development adjoining or close to the existing built-up confines of the following settlements will be acceptable: ... Providing that each of the following criteria is met:".
- 4.3.11 Gladman request that the policy specifically includes infill development within the list of acceptable development in the Open Countryside. The impact of such proposals on the open countryside are negligible as they are already considered within an existing built development context.

Policy EN18: Areas of Separation

- 4.3.12 In general terms Policy EN18 seeks to prevent coalescence and protect settlement identity through the retention and expansion of existing Areas of Separation set out in Policy 19 of the Central Lancashire Core Strategy and Policy EN4 of the Preston Local Plan. It outlines that development within the identified gaps will only be supported where:
- a) *it would not undermine the physical extent and/or visual separation of settlements; and*
 - b) *it would not have an urbanising effect detrimental to:*
 - i. *the character of the open countryside; or*

ii. *the separate identity of the adjoining settlements*

- 4.3.13 Gladman does not consider Policy EN18 to be consistent with national policy, which makes no specific provision, outside of Green Belt, for the prevention of coalescence of settlements. While there may be reasons for maintaining separation on the basis of particular views, this does not require what are likely to become further de-facto Green Belts to prevent sustainable development on the edge of sustainable settlements, including Broughton, Goosnargh/Whittingham, and Grimsargh.
- 4.3.14 It is clearly the Council's intention to create a belt around Broughton to the east of the railway line, where development will be restricted rather than address specific points at which the separate character of a settlement may be impacted on by development. For example, the Broughton – Barton AoS extends to areas where there is clearly very limited risk that the character of the intervening open countryside or the separate identity of the settlements would be impacted upon by development. This includes the aforementioned site 'Land off Garstang Road', Broughton.
- 4.3.15 The Open Space Land Assessment: Appendix C, Areas of Separation (December 2022), which forms part of the emerging Local Plan evidence base, specifically refers to the site's containment by James Towers Way and states that the site is more strongly related to the settlement of Broughton, than the open countryside to the north.
- 4.3.16 From a landscape perspective, the officer's report to committee members in relation to application ref. 06/2018/1297 concluded that that *'the site is not of any notable landscape value in terms of its character and appearance and the impact of the proposal is therefore not considered to be significant.'*
- 4.3.17 Another example of a site's incorrect placement in the AoS, relates to the retention of land at the western edge of Goosnargh, also referred to as 'Land off Churchgate' in the site submission section of this representation. It is assumed that the site's retention within the AoS is a mistake, as it has previously been concluded in the determination of application ref. 06/2020/1136 that the development of the site would not cause harm to the effectiveness of the AoS. The officer's report states:

'The proposed scheme would not result in the merging of the settlements of Goosnargh, Broughton and Grimsargh. As such, it is considered the effectiveness of the AoS gaps would be maintained. It is therefore considered that the proposal would not cause harm to the effectiveness of the AoS and would not conflict with [Policy EN4]'

4.3.18 Without prejudice to Gladman's view regarding the lack of justification for the inclusion of an AoS designation in the plan at all, Gladman specifically object to the placement of the sites referred to above in the AoS on the basis their inclusion does not serve the intention of the policy in any event.

4.3.19 In summary, the Gladman do not consider the proposed AoS designation to be consistent with national policy or justified. Consideration of the character of settlements can still be taken into account, but this should be specific and targeted rather than the blanket approach that is set out in EN18. This matter is considered further in the appended Randall Thorp assessment.

4.4 Climate Change and Sustainable Energy

Policy CC1 (Strategic Policy): Climate Change & Policy CC3: Reducing Energy Consumption

4.4.1 Gladman acknowledge that the planning system has an important role to play in tackling the effects of climate change. In this respect, the overarching environmental objective cited in paragraph 8 of the NPPF highlights how the planning system should help to mitigate and adapt to climate change and support the transition to a low-carbon economy.

4.4.2 This objective filters through to other elements of the Framework including Chapter 14 that deals specifically with meeting the challenge of climate change. In this regard, paragraph 161 of the Framework identifies that:

4.4.3 *"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve*

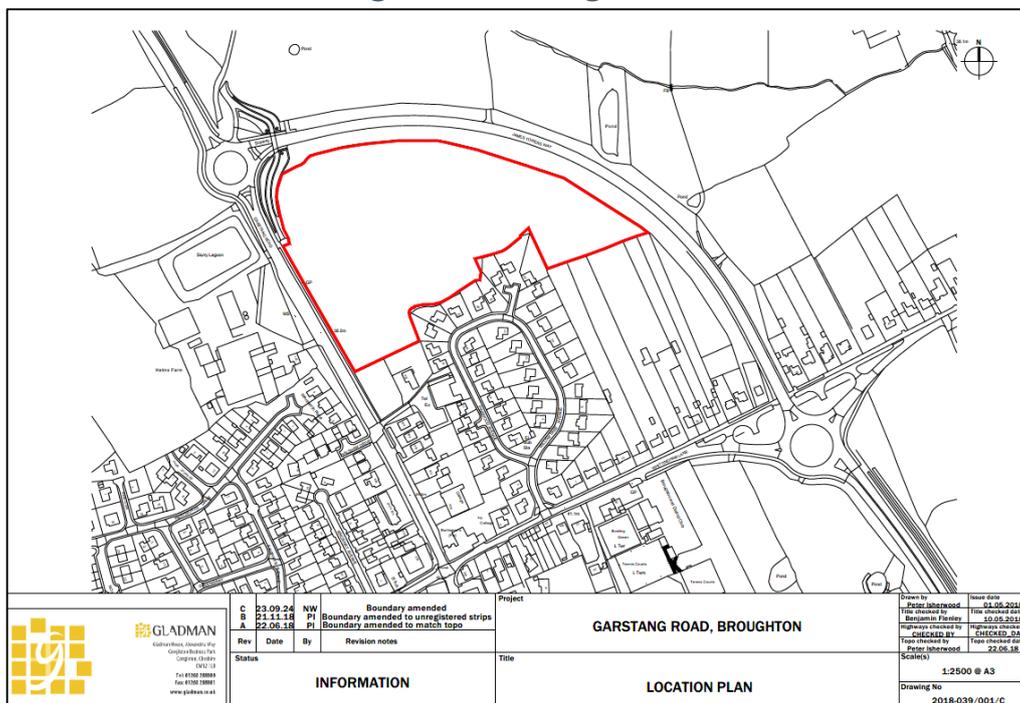
resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

- 4.4.4 It is considered by many that the best way to ensure a consistency of approach to this issue is through the use of Building Regulations. This approach ensures that the technology that is being developed and the designs that are being worked on by developers, are all aimed at achieving a common goal in a common way. This is the most cost effective and resource efficient way of achieving the Government's aims.
- 4.4.5 As the councils will be aware, from 2025, the Future Homes Standard will mean that all new homes built will be zero carbon ready and will be zero carbon as the national grid decarbonises. This is planned for 2035 well ahead of the Government's legal commitments for the nation to be net zero by 2050. Therefore, whilst we agree with the councils that there is a need to act we would disagree that this needs to be undertaken through the local plan given that there is already a national approach to achieving the same goal.
- 4.4.6 Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the country in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensures that improvements to building standards are actually deliverable from the point at which they are introduced.
- 4.4.7 The Government has also provided further advice for local authorities through a Written Ministerial Statement which states *"the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale⁹."*

⁹ UK Parliament: Planning - Local Energy Efficiency Standards Update Statement made on 13 December 2023

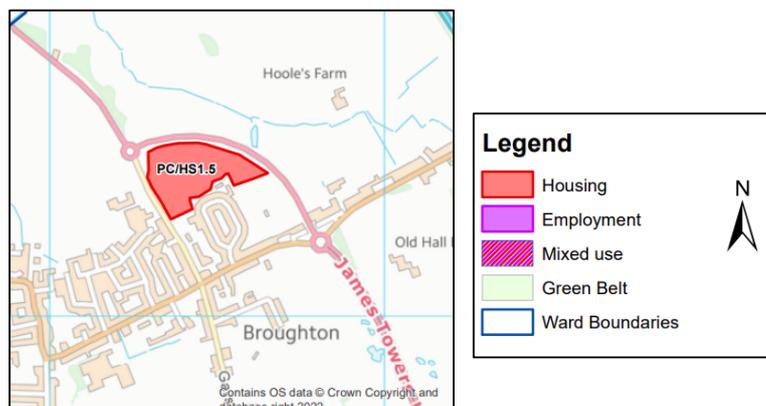
5 SITE SUBMISSIONS

5.1 Land East of Garstang Road, Broughton (Preston)



Location Plan for Land East of Garstang Road

5.1.1 Land to the East of Garstang Road, Broughton was a draft allocation in the Central Lancashire preferred options plan which is shown in the below figure (Allocation ref: PC/HS1.5). The site provides suitable land to contribute to the overall spatial strategy for growth as acknowledged in the CLLP preferred options draft plan. The site's proposed allocation was for 110 dwellings which reflects its clear credentials for future development; the site is in an entirely suitable and sustainable location to accommodate growth.



Preston Rural East Ward Allocations in Preferred Options Part 1 for Central Lancashire's Local Plan

- 5.1.2 The site has good access to social and community infrastructure that would be expected of an edge of settlement location, is not subject to any insurmountable technical or environmental constraints and can accommodate a high-quality, well contained residential development that will address identified market and affordable housing needs.
- 5.1.3 The bypass north of the settlement has recently come forward, ultimately making the north of Broughton more suitable to accommodate future growth. The site being promoted by Gladman for residential development sits south of the bypass which acts a durable boundary to potential encroachment of the open countryside.
- 5.1.4 The remainder of this section describes the site's suitability for residential development in further detail, taking account of the technical studies that have been undertaken to support the delivery of the site to date.

New Homes

- 5.1.5 The site can deliver a wide range of market and affordable homes to meet Preston City Council's general and specialist housing needs and would be able to be delivered quickly, without the need for significant infrastructure.
- 5.1.6 Gladman can confirm that the site can deliver a provision of affordable housing on-site in accordance with local planning policy.

Community Facilities and Viability

- 5.1.7 Proportionate developer contributions towards the delivery of new community infrastructure would be provided alongside any proposals.
- 5.1.8 Gladman will agree requests for developer contributions which meet the relevant requirements of paragraph 59 of the NPPF and CIL regulations 122 and 123.

Open Space and Green Infrastructure

- 5.1.9 Generous areas of informal and formal open space will underpin the proposals for the site. This would include the provision of areas of play for children. The total area

of open space provided as part of the site's development would meet Preston City Council's requirements.

Flood Risk Mitigation

- 5.1.10 The site will be developed so that flooding would not pose a constraint to the development of the site.

Highways and Sustainable Transport

- 5.1.11 The site access would be achieved via a priority T-junction on Garstang Road. Lancashire County Highways raised no objection in response to the previous application on the site¹⁰ in relation to expected traffic capacity impacts and available junction capacity.
- 5.1.12 The site benefits from good pedestrian connectivity to the village of Broughton. There are a good range of local amenities and facilities which can be accessed on foot, by cycle or by public transport within nationally recognised acceptable walking and cycling distances. Facilities such as a primary school, secondary school, village shop, public houses, hairdressers, a pharmacy, playing fields and a church are all within the CIHT 'preferred maximum walking distance' guidance.
- 5.1.13 The nearest bus stop to the site is situated on Garstang Road, lying approximately 200m walk to the south from the centre of the site. Broughton benefits from a larger number of services operating at regular intervals, notably the no.40 which travels between Preston city centre and Lancaster city centre, via Broughton.

Heritage

- 5.1.14 Pegasus, on behalf of Gladman, prepared an Archaeological Desk-Based Assessment in support of the previous planning application on the site which concluded that there would be no impact on any designated or non-designated heritage assets as a result of any residential development on the site. The only identified designated heritage assessment within 400m is a Grade II milestone on the opposite side of Garstang

¹⁰ Preston City Council planning application reference: 06/2018/1297

Road. The Assessment identifies that the milestone draws its significance from its structure as well as its position along the road. Residential development on the site would not alter this and would therefore cause no harm to the milestone's heritage significance.

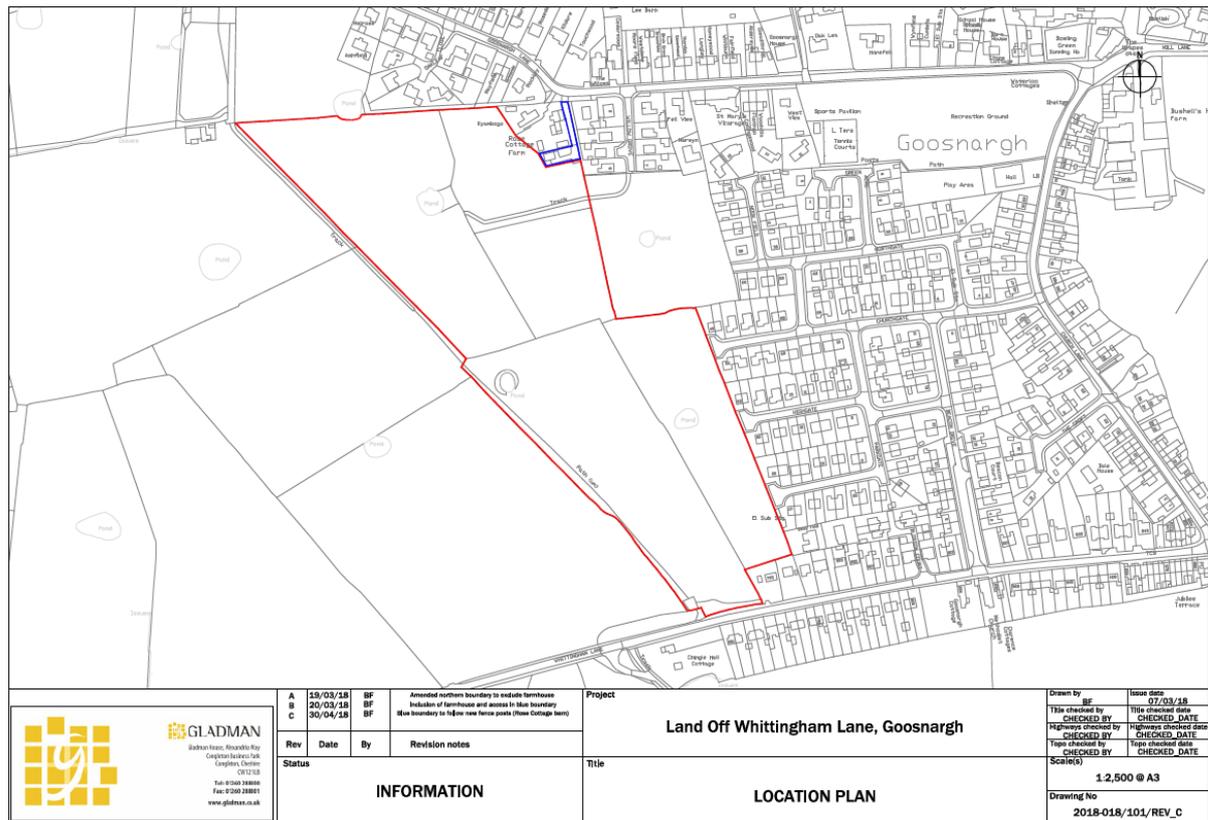
Landscape

- 5.1.15 The site is well contained by existing boundary vegetation, providing a distinct point of separation from the wider countryside. This is further enhanced by the James Towers Way bypass which forms a hard boundary to the settlement, thus the site is very well contained and relates well to the built form of the settlement.
- 5.1.16 Furthermore, neither the site nor the immediate landscape is concerned by any statutory or non-statutory designations for landscape character or quality, demonstrating its suitability for well related residential development.

Conclusions

- 5.1.17 In conclusion, there were no technical constraints on the site identified by the Council through the submission of the previous planning application. Furthermore, the case officer concluded that the proposed development can be considered sustainable in terms of its accessibility. Gladman can further confirm that the site is suitable, available, and deliverable.

5.2 Land off Churchgate, Goosnargh (Preston)



Location Plan for Land off Churchgate, Goosnargh

- 5.2.1 The site's location is shown above in the location plan and sits west of the Goosnargh settlement. The proposed development site is for up to 145 dwellings and is in an entirely suitable and sustainable location to accommodate growth.
- 5.2.2 The site has good access to social and community infrastructure that would be expected of an edge of settlement location and is not subject to any insurmountable technical or environmental constraints and can accommodate a high-quality, well contained residential development that will address identified market and affordable housing needs.
- 5.2.3 The site is a logical extension west of the settlement and sits south of the approved scheme (Ref: 06/2018/1356) by Emery Planning for up to 26 dwellings which is now being built out.

- 5.2.4 The remainder of this section describes the site's suitability for residential development in further detail, taking account of the technical studies that have been undertaken to support the delivery of the site to date.

New Homes

- 5.2.5 The site can deliver a wide range of market and affordable homes to meet Preston City Council's general and specialist housing needs and would be able to be delivered quickly, without the need for significant infrastructure.
- 5.2.6 Gladman can confirm that the site can deliver a provision of affordable housing on-site in accordance with local planning policy.

Community Facilities and Viability

- 5.2.7 Proportionate developer contributions towards the delivery of new community infrastructure would be provided alongside any proposals.
- 5.2.8 Gladman will agree requests for developer contributions which meet the relevant requirements of paragraph 59 of the NPPF and CIL regulations 122 and 123.

Open Space and Green Infrastructure

- 5.2.9 Areas of both informal and formal open space will underpin the proposals for the site. This will include the provision of areas of play for children next to the existing settlement. The total area of open space provided as part of the site's development would meet Preston City Council's requirements and be accessible to both new and existing residents in Goosnargh.

Flood Risk Mitigation

- 5.2.10 The site, can be developed safely in relation to flood risk and flooding would not pose a constraint to the development of the site.

Highways and Sustainable Transport

- 5.2.11 The site access will be from Churchgate Road which connects directly onto Church Lane which intersects with the main B5269 road south of Goosnargh.

5.2.12 The site benefits from good pedestrian connectivity into the village centre of Goosnargh with a PRow running along the western boundary south, connecting the site directly onto Whittingham Lane (B5269) where several bus stops sit. There are a good range of local amenities and facilities which can be accessed on foot, by cycle or by public transport within nationally recognised acceptable walking and cycling distances. Facilities such as a primary school, village shop, and a church are all within the CIHT 'preferred maximum walking distance' guidance.

5.2.13 The nearest bus stop to the site is situated on Whittingham Lane, lying approximately a 500m walk to the southeast from the centre of the site. Goosnargh benefits from a larger number of services operating at regular intervals, notably the no.45 and no.46 travelling regularly into Preston city centre in 35 minutes.

Heritage

5.2.14 There are no designated or undesignated heritage assets recorded within the proposed development area, additionally there are no features of archaeological interest within the site which have been found in previous desk-based assessments on the site. There are no nearby listed buildings visible to or from the site and the site therefore does not have any impacts on heritage on or nearby to the site.

Landscape

5.2.15 The site is a logical extension of the settlement to the west, and south of the approved application by Emery Planning for up to 26 dwellings which is now being built out. The site therefore rounds off the Goosnargh settlement to the southwest and is a logical area for growth.

5.2.16 The site nor the immediate landscape is concerned by any statutory or non-statutory designations for landscape character or quality, demonstrating its suitability for well related residential development.

Conclusions

5.2.17 In conclusion, there were no technical constraints on the site identified by the Council through the submission of the previous planning application. Furthermore, the case officer concluded that the proposed development can be considered sustainable in terms of its accessibility. Gladman can further confirm that the site is suitable, available, and deliverable.

6 CONCLUSION

6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the CLLP Regulation 19 consultation. As mentioned in this representation, for the CLLP to be found sound at examination it must be able to meet the four tests of soundness. For the reasons set out in the representation, Gladman consider the CLLP regulation 19 submission to fail these tests.
- 6.1.2 With regards to meeting housing need, the CLLP's approach is neither positively prepared nor consistent with national policy on the basis that it has not tested varying scenarios of meeting the new stock-based LHN. Instead, the CLLP has applied an unevidenced and therefore unjustified arbitrary uplift to meet the requirements of paragraph 234(a) of the 2024 Framework. The chosen scenario upon which the proposed housing requirement is based, achieves only 76% of this figure and therefore does not meet the 80% threshold required for the plan to be examined under the 2023 version of the Framework. The CLLP as currently drafted therefore undermines the Government's objective of delivering 1.5million homes during the current parliament.
- 6.1.3 Gladman strongly urge the Central Lancashire Authorities to reconsider its position and amend the CLLP to account for the area's full and effective LHN under the stock based standard method and then proceed with a Plan that can stand up to scrutiny at examination.
- 6.1.4 The sites included in the site submission section of this representations are available, suitable and deliverable. Indeed, the site located east off Garstang Road has previously been positively assessed and included as a preferred housing site in the Regulation 18 consultation version of the CLLP.
- 6.1.5 The inclusion of these sites as housing allocations would make a significant contribution towards meeting the full stock based LHN figure, which the CLLP should plan to deliver for. As set out in this representation and supporting report produced

by consultants Randall Thorp (Appendix 1), the inclusion of these site in the Area of Separation is unjustified.

- 6.1.6 Should the CLLP proceed to examination Gladman formally request to participate at the forthcoming hearing sessions.

APPENDIX 1- AREA OF SEPARATION REPORT PREPARED BY
RANDALL THORP





Representation to the Central Lancashire Local Plan Regulation 19 Consultation - Area of Separation

Land to the east of Garstang Road Broughton and land
off Churchgate Goosnargh

MARCH 2025

FOR : GLADMAN DEVELOPMENTS LTD

REF : 1108

Contents



01 Introduction	1
02 Local Plan and Evidence Base	4
03 Broughton - Appraisal of the site's contribution to the gap	9
04 Goosnargh - Appraisal of the site's contribution to the gap	16
05 Summary and Conclusions	19
Appendix 1 - Extracts of the Open Land Designation Study, Landscape Assessment (LUC - Oct 2022)	22

01 Introduction



BACKGROUND AND PURPOSE OF THE REPORT

- 1.1. Land to the east of Garstang Road Broughton and land off Churchgate, Goosnargh is being promoted for residential development by Gladman Developments Limited. Figure 1 shows the location of the two sites in relation to the adopted Preston Local Plan (2015)
- 1.2. The site at Broughton extends to approximately 4.39ha and is located along the northern outskirts of the village. It broadly comprises a semi-circular shaped parcel of pastoral land which is enclosed to the north and north-east by James Towers Way. To the west, the site borders Garstang Road. The southern site boundary is defined by rear gardens of properties on Pinewood Avenue / Willow Tree Avenue. The adopted Preston Local Plan (2015) shows the site as 'Open Countryside' (Policy EN1). The site was identified as a preferred housing allocation (reference PC/HS 1.5) in the Central Lancashire Local Plan, Preferred Options Part One (Reg 18) Consultation, December 2022. However, the site has been deallocated in the more recent Regulation 19 Publication Version and an Area of Separation (AoS) is now proposed between Broughton and Barton to the north, which washes over the subject site (See Figure 2). The justification for the deallocation of the site is set out in the Strategic Housing and Economical Land Availability Assessment (SHELAA) which states that the site is in the AoS and Open Countryside.
- 1.3. The site at Goosnargh extends to approximately 7.89ha and is located on the western outskirts of the village. It is contained by existing residential development to the east and parts of the northern boundary, with housing under construction forming the remainder of the northern boundary. Housing on Whittingham Lane encloses the site to the south. The adopted Preston Local Plan (2015) shows that the site falls within 'Open Countryside' (Policy EN1) and the 'Area of Separation' (Policy EN4) between Goosnargh, Whittingham and Grimsargh (See figure 1).

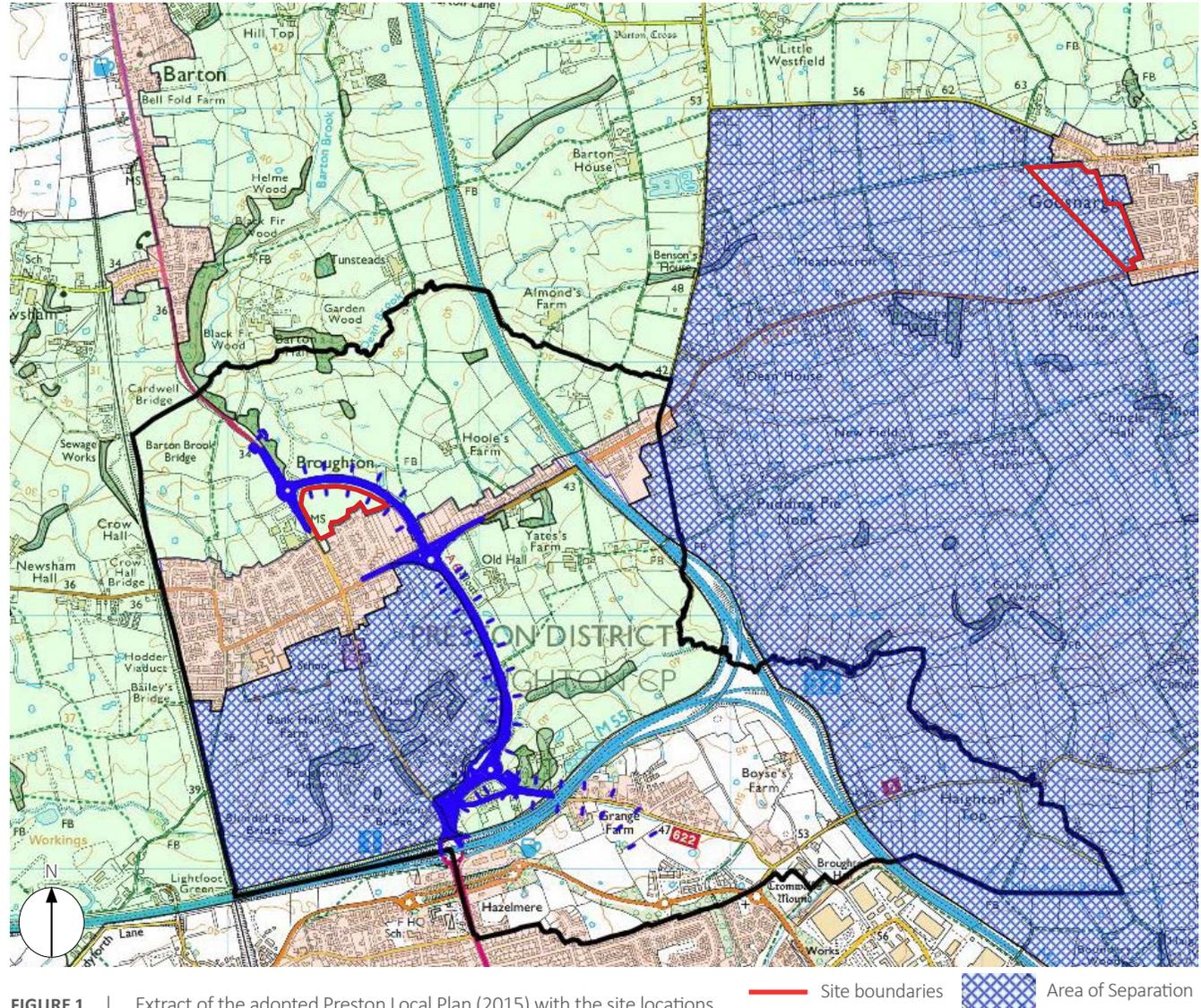


FIGURE 1 | Extract of the adopted Preston Local Plan (2015) with the site locations

— Site boundaries  Area of Separation

01 Introduction



- 1.4. Gladman have previously submitted a planning application (ref. 06/2020/1136) relating to this site and the officers report stated: *“The application site directly adjoins the southern boundary of Goosnargh village. The next nearest settlement to the south east of Goosnargh is Grimsargh, approximately 2.9km away. The nearest settlement to the west of the site is Broughton, which is around 1.9km west of Goosnargh. The Area of Separation runs between these two settlements, and also southerly and easterly of these settlements. The full extent of the AoS runs around 6km from the eastern side of the M6 towards the settlement of Longridge. The proposed scheme would not result in the merging of the settlements of Goosnargh, Broughton and Grimsargh. As such, it is considered the effectiveness of the AoS gaps would be maintained. It is therefore considered that the proposal would not cause harm to the effectiveness of the AoS and would not conflict with (Policy EN4)”. This raises the question as to whether the site at Goosnargh forms an essential part of the AoS.*
- 1.5. This report forms part of the representation made by Gladman. It considers the role that the Broughton and the Goosnargh sites play in maintaining separation between the relevant settlements.

COMPETENCY AND RELEVANT GUIDANCE

- 1.6. Randall Thorp is a landscape practice which specialises in masterplanning, strategic landscape projects, design of natural landscapes, landscape and visual assessment, urban design and expert witness services.
- 1.7. The work has been undertaken by a chartered member of the Landscape Institute with reference to, and using aspects of, the Guidelines for Landscape and Visual Impact Assessment (GLVIA), Third Edition, 2013; Landscape Institute and the Institute of Environmental Management and Assessment.

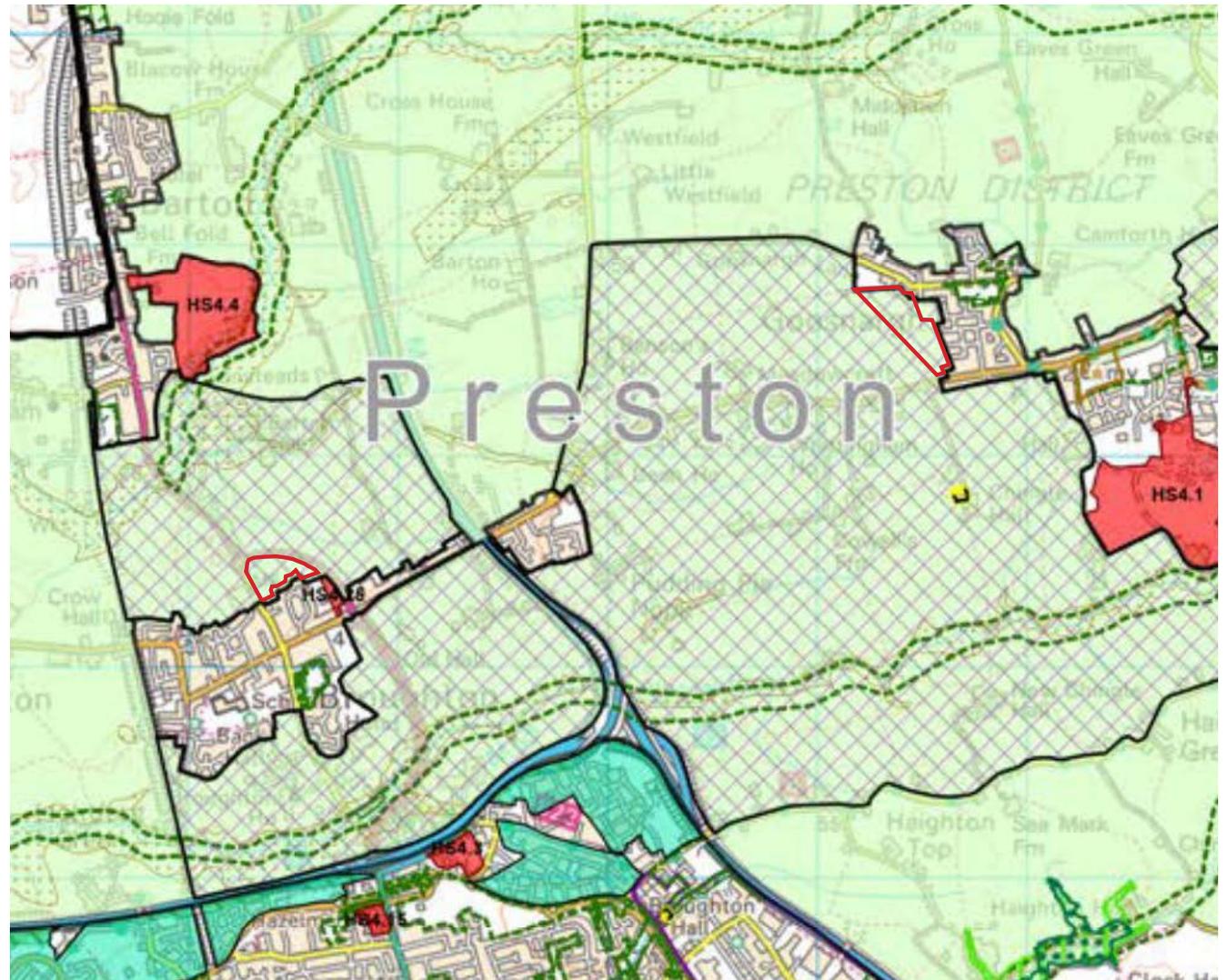


FIGURE 2 | Extract of the Central Lancashire Local Plan Policies Map Publication Version Feb 2025

— Site boundaries
— Area of Separation

01 Introduction



METHOD OF ASSESSMENT

1.8. Randall Thorp have undertaken a review of the following documents:

- Preston Local Plan (2015)
- Central Lancashire Local Plan, Preferred Options Part One (Reg 18) Consultation, December 2022
- Central Lancashire Local Plan, Preferred Options Part One (Reg 18) Consultation, December 2022 – Preston Site Profiles
- Open Land Designations Study Landscape Assessment (Oct 2022)
- Open Land Designations Study – Appendix C – Areas of Separation Assessment (Oct 2022)
- Central Lancashire Local Plan 2023-2041 (Reg 19) Consultation document
- Strategic Housing and Economical Land Availability Assessment (SHELAA)
- OS Mapping
- Aerial photographs

1.9. The Open Land Designation Study includes an assessment methodology for considering the role of the landscape in maintaining separation between settlements. Appendix 1 of this report includes an extract.

1.10. This report broadly follows the approach and criteria for assessing the landscape’s role in settlement separation, as outlined in the Open Land Designation Study. As such, the report considers both the physical and visual role that intervening open land plays in preventing the merging of settlements, with reference to:

- **Physical separation** -considering the settlement form and edge; the width of the gap (as the crow flies); the presence of intervening urbanising development; and the presence or absence of separating features, such as rivers, railway lines or prominent topographical features.
- **Visual separation** -considering the presence or absence of landscape elements that either decrease or increase inter-visibility between settlement edges, such as woodland, hedgerows or intervening topography.
- **Connection** – considering the presence or absence of road routes that directly connect settlements; and the influence of any intervening urbanising development on the perceived sense of separation when travelling between settlements.

1.11. The assessment is based on desk study and site survey undertaken on the 24th January 2025, to gain an understanding of the landscape characteristics and the visual sensitivities. Photographs were taken to record views from readily accessible public viewpoints. Photographs are presented within the report with the intention of aiding the understanding of the descriptive text.

1.12. This report is structured to provide the following:

- An overview of the Local Plan evidence base in relation to the relevant Areas of Separation
- **Broughton site**- A description of the broad landscape, visual and perceptual characteristics of the site and immediate area, and consideration as to the extent that the site contributes to the purpose of separating the settlements.
- **Goosnargh site**- A description of the broad landscape, visual and perceptual characteristics of the site and immediate area, and consideration as to the extent that the site contributes to the purpose of separating the settlements.
- Summary and conclusions.
- Appendix 1- Extracts from the Open Land Designation Study (2022)

02 Local Plan and Evidence Base



PRESTON LOCAL PLAN 2012-26 SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES (2015)

- 2.1. Three Areas of Separation were identified within Preston. As shown on Figure 1 above, this included land between Broughton and the Preston Urban Area and land between Goosnargh Whittingham and Grimsargh, which includes the Goosnargh site.
- 2.2. Policy EN4 – ‘Areas of Separation’ seeks to prevent “harm to the effectiveness of gaps between settlements and, in particular, the degree to which the development proposed would compromise the function of the Area of Separation in protecting the identity and distinctiveness of settlements”.
- 2.3. Policy EN4 therefore, does not preclude development within the AoS but states that “Development will be assessed in terms of its impact upon the Area of Separation”.

CENTRAL LANCASHIRE LOCAL PLAN PREFERRED OPTIONS PART ONE (REG 18) CONSULTATION (DEC 2022)

- 2.4. The Central Lancashire Authorities drew on information in the SHELAA to identify a sufficient supply and mix of specific deliverable and developable sites to meet the area’s identified housing land requirements. Site profiles were prepared for each site.
- 2.5. Preston Site Profiles included:
 - P19P007 (SHELAA Ref), PC/HS1.5 (Allocation Ref) Land to the East of Garstang Road, Broughton- 4.4ha, 110 dwellings
 - 19P008 (SHELAA Ref), Land off Whittingham Lane- 7.9 ha, 198 dwellings
- 2.6. Both sites were considered to be suitable, available and achievable.

OPEN LAND DESIGNATIONS STUDY - LANDSCAPE ASSESSMENT (OCT 2022)

- 2.7. The study states within the introduction “This ‘areas of separation’ assessment focuses on the spatial separation of settlements, taking into consideration the presence of physical features that serve to either reduce or increase the perceived gaps between settlements. It provides an evaluation of the gap, followed by identification of any variations and provides an overall judgement on the strength of the gap, whether it is robust, moderate or fragile. The assessment also notes the key elements that contribute to the maintenance of the gap”.
- 2.8. Chapter 3 of the report provides an assessment methodology. The settlement gaps pertinent to this report which were assessed as part of the study are those between:
 - Broughton and Barton, and
 - Broughton and Goosnargh.
- 2.9. The assessment considers the strength of each gap, and identifies key landscape elements. As outlined above, the assessment considers both the physical and visual role that intervening open land plays in preventing the merging of settlements. Appendix 1 includes extracts of the Open Land Designations Study including the methodology applied.
- 2.10. Table 4.3 within Chapter 4 presents the areas of separation assessment findings. It finds the gap strength for the relevant settlement gaps to be ‘Moderate’ for both Broughton and Barton, and Broughton and Goosnargh.
- 2.11. Figure 3 is an extract of Figure 4.3 from the Open Land Designation Study which shows the area of separation assessment findings on a map.
- 2.12. Appendix C of the Open Land Designations Study includes the Areas of Separation Assessment.

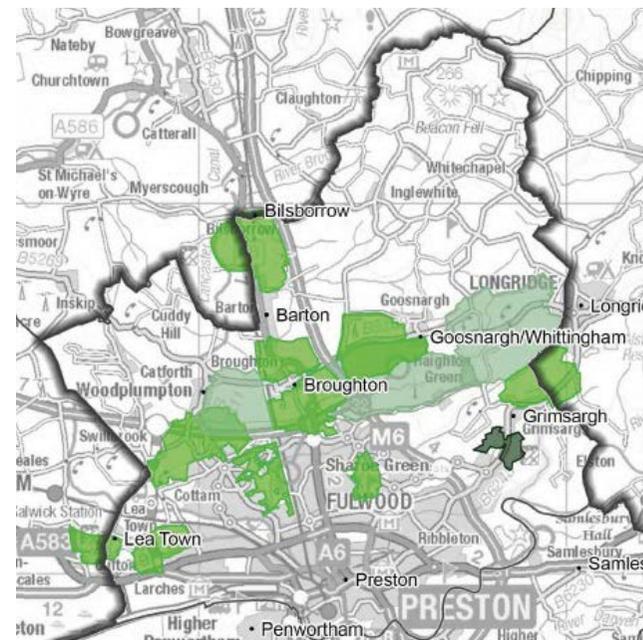


Figure 4.3: Areas of separation assessment findings



FIGURE 3 | Extract of Figure 4.3- Open Land Designation Study

02 Local Plan and Evidence Base



Broughton and Barton

2.13. Figure 4 is an extract of the plans from Appendix C of the Open Land Designation Study showing the Broughton and Barton gap. It shows an “Area within which settlement separation should be a consideration” which includes the Broughton site. It is noted that this is not keyed as a definitive Area of Separation. In addition the text within the Appendix C refers only to a ‘gap’ and not an ‘Area of Separation’.

2.14. With regard to ‘Physical Separation’ the study states “The gap between Broughton and the Barton is between approximately 900m and 1.2km, which is moderate in size compared to the size of both villages. The gap comprises open countryside with little to no intervening urbanising development. There are a number of significant separating features within the gap: Barton Brook and Dean Brook, and their associated shallow valley forms and vegetation; and Several woodlands, including Black Fir Wood, Garden Wood and woodland belts along Garstang Road”.

2.15. With regard to ‘Visual Separation’ the study states: “The woodland cover, together with numerous hedgerows and mature hedgerow trees delineating fields and gently rolling topography, provide a good level of visual separation, with intervisibility between the two settlements being very limited. The James Towers Way bypass (single carriageway forming part of the A6) forms another separating feature in proximity to the north-eastern edge of Broughton”.

2.16. With regard to ‘Connection’ the study states: “There is also a strong perceived sense of separation when travelling between the two settlements along Garstang Road and the James Towers Way bypass (A6). The linear distance between the settlements along these routes is approximately 920m and 1km respectively. A relative lack of intervening development and views across the adjacent open countryside available from both routes provides

a strong sense of rural separation between the two settlements. The West Coast Main Line forms a direct route between the two settlements along the western periphery of the gap, although neither village has a station”.

2.17. In terms of ‘Variations in contribution within the gap’, the study notes the following variations:

- Land on the north-western edge of Broughton and the retained area of open land between the north-eastern settlement edge and James Towers Way has a visual connection with the settlement edge. James Towers Way acts as an outer boundary feature to the north-east and provides some sense of containment. The land therefore has a weaker distinction from Broughton (that is, it is more strongly related to the settlements than the open countryside to the north).
- Land lying between James Towers Way and Barton Brook is more strongly distinct from both settlements, being located some distance from both, and having less visibility towards either, and having some landform distinction (the shallow valley form of the two brooks). It is therefore perceived as being central to the gap.
- Land on the south-western edge of Barton and northern edge of Broughton lies in relative proximity to the settlement edge; has a similar landform to that of the settlement; and has relatively weak boundary features between it and the settlement edge (formed predominantly of residential garden boundaries), with some resulting visual connection. The land therefore has a weaker distinction Barton.

2.18. Overall, the strength of the gap between Broughton and Barton is considered to be **moderate**, with the following key elements contributing to the maintenance of the gap:

- The role of James Towers Way as a boundary to development along the northern eastern edge of Broughton.
- The role Dean Brook and Barton Brook and several woodlands as significant separating features.

- The visual separation provided by the gently rolling topography and intervening vegetation.
- The lack of intervening urbanising development and open views across the surrounding farmland when travelling between the two settlements along Garstang Road.

Broughton and Barton

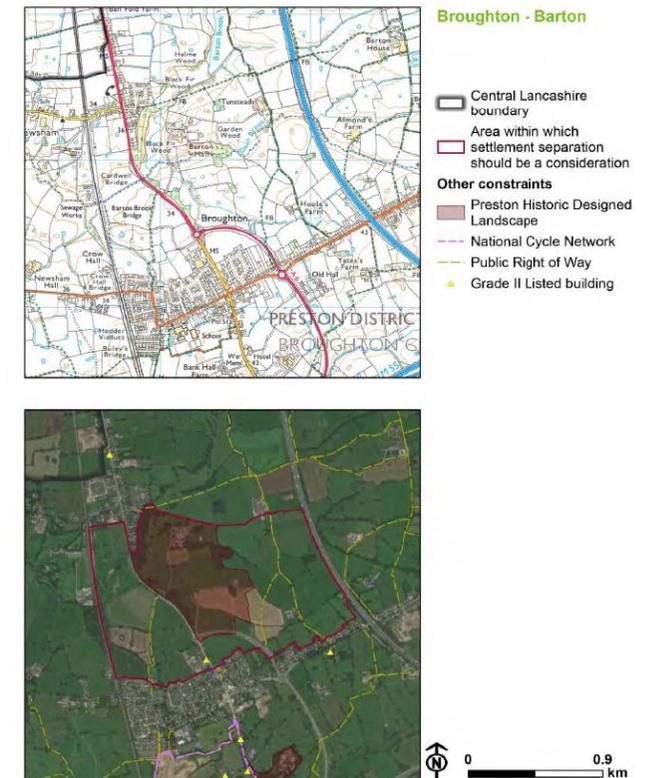


FIGURE 4 | Extract of Appendix C- Open Land Designation Study

02 Local Plan and Evidence Base



Broughton and Goosnargh

2.19. Figure 5 shows an extract of the plans from Appendix C of the Open Land Designation Study showing the Broughton and Goosnargh gap. It shows an “Area within which settlement separation should be a consideration” which includes the Goosnargh site.

2.20. With regard to ‘Physical Separation’ the study states: “At its narrowest, the gap between Broughton and Goosnargh is approximately 1.9km as the crow flies (measured between the Dean Brook boundary of Broughton and the western settlement edge of Goosnargh). This gap is wide in comparison to the size of both villages, and contains Dean Brook and its shallow valley, which defines the eastern extent of Broughton and provides a separating feature between the two settlements. The M6 motorway runs north-south through Broughton largely on embankment. Whilst this outside the gap to the west and development in Broughton extends beyond it (as described), it forms a significant separating feature to the east of the main area of the village which increases a sense of separation. The gap contains some ribbon development along Whittingham Lane, Langley Lane and Goosnargh Lane, which diminishes the sense of physical separation to some extent”.

2.21. With regard to ‘Visual Separation’ the study states: “The landscape within the gap comprises undulating farmland defined by hedgerows with occasional hedgerow trees. Dean Brook and a tributary of Blundell Brook to the south are also relatively well-treed. This creates a strong sense of visual separation between the two settlements, with very limited inter-visibility between them”.

2.22. With regard to ‘Connection’ the study states: “Whittingham Lane provides a direct road route between the two settlements, which equates to a linear distance of approximately 1.9km. A

longer route is also available via Langley Lane and Goosnargh Lane to the north. Whilst there is ribbon development along these routes, large gaps between the areas of development allow views across the adjacent open countryside and this provides a strong sense of rural separation”

2.23. In terms of ‘Variations in contribution within the gap’, the study notes the following variations:

- Land lying between Pudding Pie Nook Lane and Dean Brook to the east lies in close proximity to the edge of Broughton (including the ongoing development off Bamford Road) and has some visual connection with the settlement edge. The land therefore has a weaker distinction from Broughton (that is, it is more strongly related to the settlement than the open countryside) than land further to the east.
- Land between Langley Lane/Pudding Pie Nook Lane and Public Rights of Way 6-9 FP4, 6-9 FP7 and 6-9 FP16 (in the vicinity of Chingle Hall and Swainson’s Farm) is strongly distinct from both Broughton and Goosnargh/Whittingham, being located some distance from, and having limited views towards, both settlements; and having some landform distinction (the shallow valley form of Dean Brook and tributary of Blundell Brook). It is therefore perceived as being central to the gap.
- Land to the east of Public Rights of Way 6-9 FP4, 6-9 FP7 and 6-9 FP16 lies in relative proximity to Goosnargh/Whittingham; has a similar landform to that of the settlement; and has relatively weak boundary features between it and the settlement edge, with some resulting visual connection. The land therefore has a weaker distinction from Goosnargh/Whittingham.

2.24. Overall, the strength of the gap between Broughton and Goosnargh is considered to be **moderate**, with the following key elements contributing to the maintenance of the gap:

- The visual separation provided by hedgerow trees and tree

cover along Dean Brook and the M6 embankments.

- The role of Dean Brook as a separating feature on the eastern edge of Broughton.
- The landform distinction created by the shallow valley of the Dean Brook.

Broughton and Goosnargh

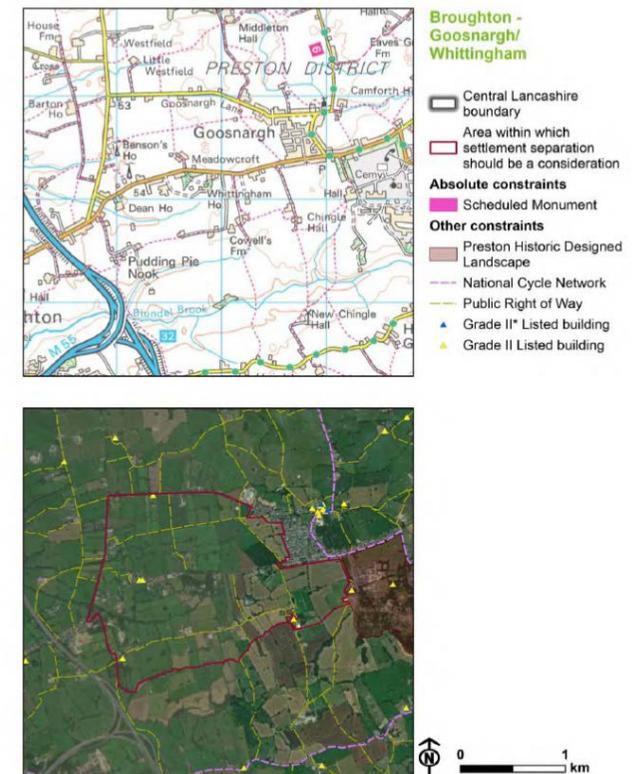


FIGURE 5 | Extract of Appendix C - Open Land Designation Study

02 Local Plan and Evidence Base



CENTRAL LANCASHIRE LOCAL PLAN 2023-2041- REGULATION 19 PUBLICATION VERSION (FEB 2025)

2.25. The new Local Plan for the three authorities of Chorley, Preston and South Ribble is being prepared to cover the period to 2041. The consultation (Regulation 19) is the final opportunity for stakeholders, consultation bodies and any others to provide feedback on the new local plan, before it's submitted to the Secretary of State in Summer 2025.

2.26. Figure 6 (like figure 2) is a extract of the Local Plan Policies Map showing the extent of the Areas of Separation. Open land to the north of Preston is also 'Open Countryside'- Policy EN17.

2.27. Policy EN18: Area of Separation states:

"1. Areas of Separation will be maintained to protect areas where there is a risk of coalescence.

2. Development proposed within the defined Areas of Separation as shown on the policies map will be permitted provided that it accords with the spatial strategy for growth set out in Policy SS1 Development Patterns, and:

a) it would not undermine the physical extent and/or visual separation of settlements; and

b) it would not have an urbanising effect detrimental to:

i. the character of the open countryside; or

ii. the separate identity of the adjoining settlements".

2.28. The justification text (para 7.116) states: "An Area of Separation is designed to continue to preserve the identity, character and distinctiveness of identified settlements by resisting development that would result in the coalescence of two distinct and separate

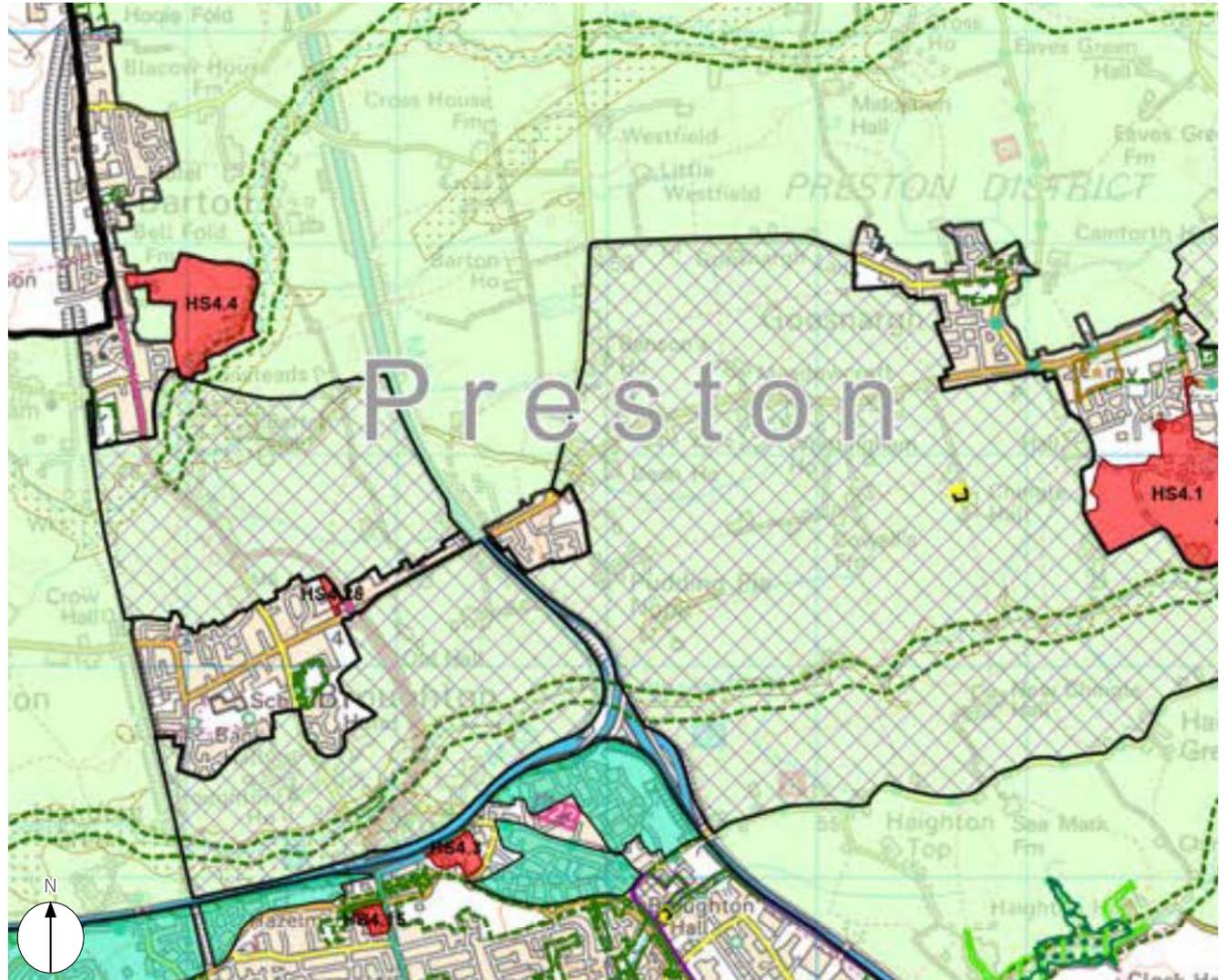


FIGURE 6 | Extract of the Central Lancashire Local Plan Policies Map Publication Version Feb 2025

 Area of Separation

02 Local Plan and Evidence Base



settlements. These areas are defined on the policies map and this policy protects these areas and sets out requirements for development within these areas”.

- 2.29. Paragraph 7.117 states: “A landscape assessment has been provided on behalf of the Central Lancashire Councils to assess and set out the importance and role of continuing to maintain gaps, identified as Areas of Separation, between the settlements and the main urban area of Preston. The study identifies that the open countryside areas across Central Lancashire perform an important role in separating and providing a setting for the area’s rural settlements. Maintaining the individual identities of our communities is an important priority for the Local Plan. To support this, the extent, amount and location of our Areas of Separation have been reviewed and revised, taking into consideration recent developments and planning commitments within these areas, where significant development has taken place outside of the settlement boundary”. Paragraph 7.119 states: “The Council considers that designating areas between settlements as settlement gaps to be kept free of urbanising development is the best way of preventing further loss of local identity. Following a review of the boundaries of settlement gaps and consideration of the extent of land required to prevent coalescence of settlements, the Council has defined a number of such gaps as shown on the policies map”.
- 2.30. Paragraph 1.117 refers to a ‘landscape assessment’ and, in the absence of any other evidence base, this must be referring to the Open Land Designation Study. However, it is unclear where the evidence base is for the “review of the boundaries of settlement gaps and consideration of the extent of land required to prevent coalescence of settlements” as the Open Land Designation Study Area only goes as far as identifying the “Area within which settlement separation should be a consideration” and does not provide definitive boundaries for the Areas of Separation which are supported by sound reasoning.

CENTRAL LANCASHIRE LOCAL PLAN STRATEGIC HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT (SHELAA) (JAN 2025)

- 2.31. The Introduction, paragraph 1.6 states “The Central Lancashire SHELAA provides a complete audit of available land by identifying all the sites available for development across Central Lancashire. The SHELAA will not in itself determine whether a site should be allocated for development in the Local Plan. The role of the assessment is to provide information on the range of sites that are available to meet Central Lancashire’s housing and economic land requirements; it is for the Local Plan itself to determine which sites are the most suitable to meet those requirements”.
- 2.32. Paragraph 3.20 of the SHELAA sets out that “All sites taken forward to Stage 2 were subject to a more detailed assessment to determine if they are suitable, available, and achievable”. The detailed assessments included are noted as: Flood Risk Assessment; Sustainability Appraisal; Habitats Regulation Assessment; Highways and Pedestrian Access Assessment; Strategic Highways and Transport Assessment; Heritage Impact Assessment; and a Utilities access/provision. There is no mention of any further assessments to define the boundaries of the AoS.
- 2.33. Paragraph 3.24 states “Following the detailed assessments a number of sites were discounted as they were identified as not being suitable, available, and/or achievable. Appendix 3 includes a schedule of these sites along with the reason they were discounted”.

- 2.34. Appendix 3 of the SHELAA includes a table of ‘Discounted Stage 2 Sites’. This includes SHELAA sites:
- 19P007 Land to the East of Garstang Road, Broughton (the Broughton site in question) with the reasoning being the “Site does not accord with Spatial Strategy- site within AoS and OC”.
 - 19P008 Land off Whittingham Lane, Goosnargh (the Goosnargh site in question) with the same reasoning that the “Site does not accord with Spatial Strategy- site within AoS and OC”.

03 Broughton - Appraisal of the site's contribution to the gap



- 3.1. This section considers how the Broughton site contributes to the gap between Broughton and Barton. Figure 7 shows the Broughton site in relation to the gap between Broughton and Barton on an aerial base. The Central Lancashire Local Plan Policies Map (extract - Figure 6 above) shows the extent of the settlement boundaries.
- 3.2. Broughton is a relatively dense development mainly concentrated along the B5269, Woodplumpton Lane / Whittingham Lane which runs on an east-west axis. The northern edge of the village is largely defined by residential garden boundaries. The farmhouse and large outbuildings at Barrow A & FE Farm are considered to fall outside the settlement boundary - see Figure 5 above for the settlement boundary.
- 3.3. Barton is a north-south linear village extending predominantly along the A6. The southern extent of the settlement and is bounded by mature woodland of Black Fir Wood and the recent housing development at Barton Brook Green.

PHYSICAL SEPARATION

- 3.4. The gap between Broughton and Barton, taking into account the settlement boundaries as shown on Central Lancashire Local Plan Policies Map, is circa 822m at its narrowest. The dimensions are shown in pink on Figure 7, and show that the narrowest gap is between the south-western extent of Barton and the north-western corner of Broughton, near to the railway.
- 3.5. The shortest gap between Barton and the Broughton site is circa 772m, 50m less than the shortest gap according to the settlement boundaries shown on the Central Lancashire Local Plan Policies Map, which equates to a 6% reduction in the gap between Barton and Broughton. Should the Broughton site be developed, and included within the settlement boundary, there would be a relatively small loss of land within the gap and no coalescence between the two settlements.



FIGURE 7 | Broughton - Barton Context

- Site boundary
- - - Public Right of Way: FP/BW
- Watercourse
- Area central to the gap
- Viewpoint

03 Broughton - Appraisal of the site's contribution to the gap



- 3.6. The gap comprises farmland, with the A6 Garstang Road running north south between the settlements and James Towers Way forming a bypass around Broughton. The Open Land Designation Study (Appendix C) recognises that “James Towers Way acts an outer boundary feature to the north-east and provides some sense of containment”. Other urbanising elements within the gap include the large buildings at Barrow A & FE Farm, to the west of Garstang Road. These buildings are not included within the settlement boundary, but protrude northwards into the AoS, almost as far north as the James Towers roundabout. The Broughton site is enclosed to the north and east by James Towers Way, and to the west by the buildings at Barrow A & FE Farm. It therefore has a closer connection with the settlement of Broughton, than the open land to the north of James Towers Way. The Open Land Designation Study recognises that “the retained area of open land between the north-eastern settlement edge and James Towers Way (ie Broughton site) has a visual connection with the settlement edge”. It states that “The land therefore has a weaker distinction from Broughton (that is, it is more strongly related to the settlements than the open countryside to the north)”. The containment provided by James Towers Way around the northern and eastern site boundaries and the enclosure provided by the existing buildings to the immediate south and west of the site, mean that the site is strongly associated with the settlement of Broughton and separated from the open land by urban features.
- 3.7. Natural features within the gap which provide separation include Barton Brook and Dean Brook, and their associated shallow valley forms and vegetation. There are also significant areas of trees and woodland within the gap, including Black Fir Wood, Garden Wood and woodland belts along Garstang Road. These natural features which provide separation are recognised within the Open Land Designation Study as being

central to the gap. The study states: “Land lying between James Towers Way and Barton Brook is more strongly distinct from both settlements, being located some distance from both, and having less visibility towards either, and having some landform distinction (the shallow valley form of the two brooks). It is therefore perceived as being central to the gap”. The area perceived as central to the gap is shown on Figure 7. Any development within the Broughton site, which lies to the south of James Towers Way, would have no effect upon this land which is considered to be more strongly distinct from both settlements and perceived as being central to the gap.

CONNECTION

- 3.8. Broughton and Barton are connected by the A6/Garstang Road. The Open Land Designation Study states: “There is also a strong perceived sense of separation when travelling between the two settlements along Garstang Road and the James Towers Way bypass (A6)”. The sense of perceived separation relies on there being open land and an absence of urbanising features within the gap. The study states in relation to Connection: “A relative lack of intervening development and views across the adjacent open countryside available from both routes provides a strong sense of rural separation between the two settlements”. This is true of the area which is considered to be central to the gap and which is considered to be more strongly distinct from both settlements, containing natural features such as the brooks and woodland. However, the short section of Garstang Road which borders the site has a more urban character than the section to the north of the James Towers roundabout. Heading south from the roundabout, there is a sense of arriving at Broughton, with signage to announce arrival, 20mph speed limits and traffic calming measures. The western side of the road is enclosed by the built form at Barrow A & F E Farm. As such the section of Garstang Road which borders the site is more strongly

connected to the settlement of Broughton, with the perceived sense of rural separation confined to the sections of the route located to the north of the James Towers roundabout.

- 3.9. When travelling along James Towers Way, to the north of Whittingham Lane, there are filtered views of the houses on the edge of Broughton which back onto the site and the large buildings at Barrow A & F E Farm. There is a sense that the Broughton site is part of the settlement, and a sense of leaving the settlement when reaching the roundabout and heading north on the A6.
- 3.10. The West Coast Main Line runs through the gap, between the two settlements, although neither have a station. As such those travelling by train are unlikely to register the gap, particularly whilst travelling at speed.
- 3.11. Several public footpaths radiate northwards from Broughton, although none connect directly to Barton.

VISUAL SEPARATION

- 3.12. There is a good level of visual separation between the settlements due to the relatively large distance between them, rolling topography and intervening woodland and mature hedgerows. The Open Land Designations Study recognises this stating: “with intervisibility between the two settlements being very limited”.
- 3.13. The visual separation is explored further below with reference to photographs/google images from the following locations:
- Views from the A6/Garstang Road
 - Views from the A6/James Towers Way Bypass
 - Views from public footpath FP0603 027
- 3.14. Viewpoint locations are shown on Figure 7 above.

03 Broughton - Appraisal of the site's contribution to the gap



Viewpoint Photograph 1 - View from the A6 at the southern extent of Barton, looking south

- 3.15. The southern edge of Barton is clearly defined by the Barton Brook Green Development to the west, and Black Fir Wood to the east. Therefore there is a strong sense of leaving the settlement edge and entering the rural gap to the south.
- 3.16. Longer distance views to the south-west are over the rolling countryside with barely any built development or urban land uses visible. The Open Land Designation Study notes "The

visual separation provided by the gently rolling topography and intervening vegetation" and the "The lack of intervening urbanising development and open views across the surrounding farmland when travelling between the two settlements along Garstang Road".

- 3.17. Intervening woodland screens views of the village of Broughton, so whilst there is a sense of being within the rural land between settlements, the scale of the gap between Barton and Broughton is not apparent.

- 3.18. The Broughton site is not visible, being entirely screened by intervening vegetation and the rolling topography. Therefore, in views from this location on the edge of Barton, the site makes no contribution to the open land between the settlements and does not form any visible edge.

Approximate extent of the site behind trees



PHOTOGRAPH 1 | View from the A6 at the southern extent of the settlement of Barton, looking south (google image)

03 Broughton - Appraisal of the site's contribution to the gap



Viewpoint Photograph 2 - View from the A6 near to the northern extent of Broughton, looking south

- 3.19. On approaching Broughton, the roundabout is a transitional and urbanising element. There is a sense of leaving the rural gap and arriving at the urban edge.
- 3.20. The views include multiple lighting columns, road signage and buildings on the urban edge including the large units at Barrow A & F E Farm and housing on Garstang Road.

- 3.21. The Broughton site is largely screened in the view by the hedgerow and trees growing alongside the A6. As such, from this location, the site does not contribute to any sense of openness.
- 3.22. Housing development within the Broughton site would largely be screened by the intervening vegetation. If proposed housing were to be partially visible, it would be seen in the context of existing housing on the edge of Broughton and would lie beyond the roundabout which marks the arrival at the village.

- 3.23. The Open Land Designation Study recognises that “*the retained area of open land between the north-eastern settlement edge and James Towers Way has a visual connection with the settlement edge. It also notes a key element contributing to the maintenance of the gap as being “The role of James Towers Way as a boundary to development along the northern eastern edge of Broughton”.*
- 3.24. Therefore, when approaching Broughton from the north, the Broughton site is more closely associated with the settlement and it does not form an essential part of the gap.

Approximate extent of the site behind trees



PHOTOGRAPH 2 | View from the A6 near to the northern extent of Broughton, looking south

03 Broughton - Appraisal of the site's contribution to the gap



Viewpoint Photograph 3 - View from Garstang Road near to the northern extent of Broughton, looking south

- 3.25. In views from the edge of Broughton, the buildings at Barrow A & F E Farm are prominent. The speed limit on the road is 20mph, increasing to a 40mph limit at the roundabout with James Towers Way, and traffic calming measures in the form of road narrowing are in place.
- 3.26. When travelling on this section of Garstang Road, there is a

sense of being within the village due to the presence of existing development on both sides of the road, the reduced speed limits and urbanising features associated with the road layout. The roundabout marks the transition to the rural land beyond the settlement.

- 3.27. The Open Land Designation Study states that land on the *“northern edge of Broughton lies in relative proximity to the settlement edge; has a similar landform to that of the settlement; and has relatively weak boundary features between it and the settlement edge (formed predominantly of residential garden boundaries), with some resulting visual connection”*.

3.28. The site is visible in the context of the existing development edge. Any proposed housing within the Broughton site would be closer and more noticeable than the existing settlement edge. However, there would be no sense of a reduction in the gap between the settlements as the perceived sense of arrival in Broughton is at the roundabout, before reaching the site.

3.29. In views looking north from Broughton, Barton is not discernible due to the intervening vegetation and distance between settlements. This would continue to be the case should the site be developed.

Approximate extent of the site



PHOTOGRAPH 3 | View from Garstang Road near to the northern extent of Broughton, looking south (google image)

03 Broughton - Appraisal of the site's contribution to the gap



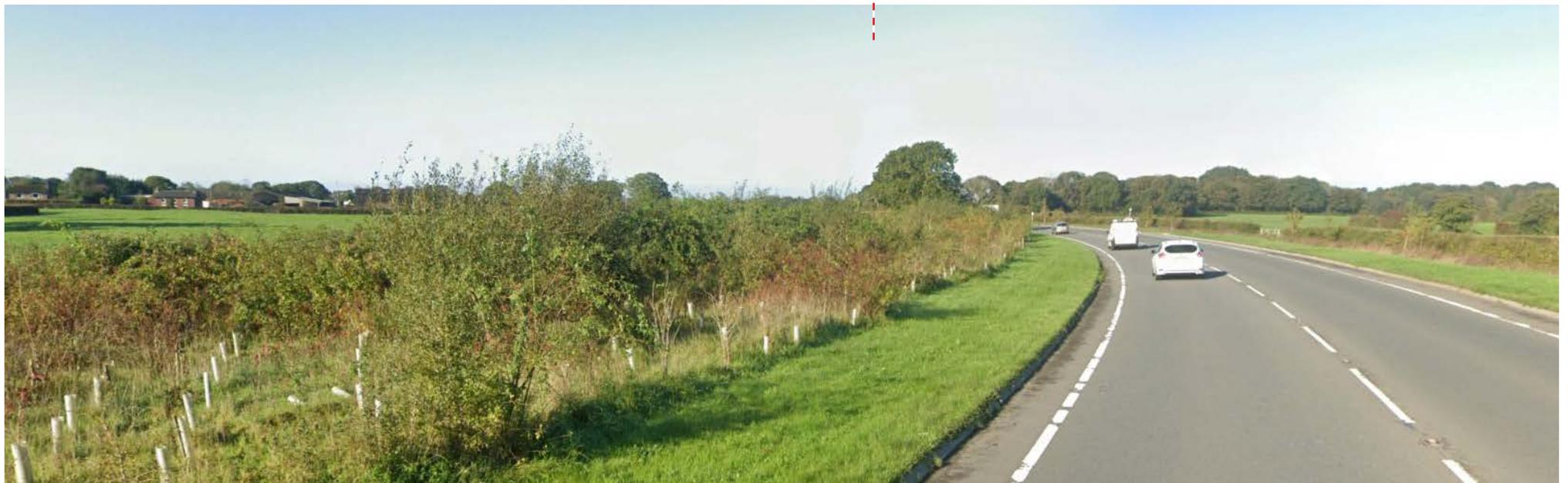
Viewpoint Photograph 4 - View from James Towers Way Bypass, looking north-west

- 3.30. The views from James Towers Way are reasonably well enclosed by planting undertaken at the time of construction of the bypass.
- 3.31. Travelling in a north-westerly direction, there are intermittent and filtered views of existing buildings on the fringe of Broughton to the west. In contrast, the views northwards are rural and do not include buildings or urbanising elements.

- 3.32. Similarly, when travelling in a south-easterly direction, the views southwards include the houses on the edge of Broughton and in a north-easterly direction there are views across the agricultural landscape, with relatively few urban features visible.
- 3.33. This supports the findings of the Open Land Designation Study which concludes that a key element contributing to the maintenance of the gap is *“The role of James Towers Way as a boundary to development along the northern eastern edge of Broughton”*.

- 3.34. It also states that *“The James Towers Way bypass (single carriageway forming part of the A6) forms another separating feature in proximity to the north-eastern edge of Broughton”*. As the Broughton site is located to the south/south-west of James Towers Way bypass, it lies within the land associated with Broughton, with the bypass providing separation from the open land to the north. The site is therefore visually not part of the gap.

Approximate extent of the site



PHOTOGRAPH 4 | View from James Towers Way Bypass, looking north-west (google image)

03 Broughton - Appraisal of the site's contribution to the gap



Viewpoint Photograph 5 - View from public footpath FP0603 027, looking south-east

- 3.35. Public footpath FP0603 027 runs centrally through the gap. The views from the route are across the rolling agricultural landscape, with trees located along the A6 curtailing the longer views eastwards.
- 3.36. The footpath runs through the landscape which the Open Land Designation Study describes as “Land lying between James Towers Way and Barton Brook is more strongly distinct from both settlements, being located some distance from both, and

having less visibility towards either, and having some landform distinction (the shallow valley form of the two brooks). It is therefore perceived as being central to the gap”.

- 3.37. The settlement edge of Broughton is just discernible in the distance when looking south and looking north, there are filtered views of the edge of the Barton Brook Green housing development in Barton. Therefore, from this location, there is an appreciation of the extent of the gap.
- 3.38. The site is distant, located around 370m away and sits partially in front of the existing housing and partially behind trees

growing alongside the A6. Housing development within the site would sit in front of the existing housing and behind existing trees, and would not noticeably alter the extent of the perceived gap.

- 3.39. The site is therefore not part of the area perceived as being central to the gap, and its close association with Broughton means that development within the site would not noticeably reduce the gap or alter the sense of separation.



PHOTOGRAPH 5 | View from public footpath FP0603 027, looking south-east

04 Goosnargh - Appraisal of the site's contribution to the gap



- 4.1. This section considers how the Goosnargh site contributes to the gap between Broughton and Goosnargh. Figure 8 shows the Goosnargh site in relation to the gap between Broughton and Goosnargh on an aerial base. The Central Lancashire Local Plan Policies Map (extract - Figure 6 above) shows the extent of the settlement boundaries.
- 4.2. Broughton is concentrated along the B5269, Woodplumpton Lane /Whittingham Lane which runs on a east-west axis. The eastern extents of the village extend beyond the M6 corridor as far as the intersection with Langley Lane.
- 4.3. Goosnargh is located to the east, further along Whittingham Lane. The western edge of the village is formed primarily of domestic garden boundaries and remnant field hedgerow boundaries. There is a housing site under construction to the north and south of Goosnargh Lane, on the western outskirts of the village.

PHYSICAL SEPARATION

- 4.4. The gap between Broughton and Goosnargh, taking into account the settlement boundaries as shown on Central Lancashire Local Plan Policies Map, is circa 1.9 km at its narrowest. The dimensions are shown in pink on Figure 8, and show that the narrowest existing gap is between Dean Brook in Broughton and the western settlement edge of Goosnargh.
- 4.5. The Open Land Designation Study notes that *“This gap is wide in comparison to the size of both villages, and contains Dean Brook and its shallow valley, which defines the eastern extent of Broughton and provides a separating feature between the two settlements”*. Should the Goosnargh site be developed, and included within the settlement boundary, there would be no narrowing of the gap and no coalescence between the two settlements.



FIGURE 8 | Broughton - Goosnargh Context

 Site boundary	 Public Right of Way	 Housing site	 Area central to the gap	 Viewpoint
---	---	--	---	---

04 Goosnargh - Appraisal of the site's contribution to the gap



CONNECTION

- 4.6. Broughton and Goosnargh are directly connected by Whittingham Lane. An alternative, and longer route, is via Langley Lane and Goosnargh Lane.
- 4.7. The Open Land Designation Study states: *“Whilst there is ribbon development along these routes, large gaps between the areas of development allow views across the adjacent open countryside and this provides a strong sense of rural separation”*. When travelling from Broughton to Goosnargh on Whittingham Lane, the sense of arrival in Goosnargh is marked by the existing housing located to the south of Whittingham Lane. Development within the Goosnargh site would not alter this sense of arrival, as development would not extend any further westward along Whittingham Lane. When entering Goosnargh via Goosnargh Lane, the arrival point is marked by the housing under construction to the north of the Goosnargh site. Development within the Goosnargh site would not alter this sense of arrival or extend development further west.

VISUAL SEPARATION

- 4.8. There is a good level of visual separation between the settlements due to the large distance between them, rolling topography, intervening hedgerows with mature trees and the well-treed Dean Brook. The Open Land Designations Study recognises this stating: *“This creates a strong sense of visual separation between the two settlements, with very limited inter-visibility between them”*. The edge of Goosnargh is not visible from Broughton, and neither is the edge of Broughton visible from Goosnargh.
- 4.9. The Open Land Designations Study considers that *“Land between Langley Lane/Pudding Pie Nook Lane and Public Rights of Way 6-9 FP4, 6-9 FP7 and 6-9 FP16 (in the vicinity*

of Chingle Hall and Swainson's Farm) is strongly distinct from both Broughton and Goosnargh/Whittingham, being located some distance from, and having limited views towards, both settlements; and having some landform distinction (the shallow valley form of Dean Brook and tributary of Blundell Brook). It is therefore perceived as being central to the gap”. The area considered to be central to the gap is shown on Figure 8. Any development within the Goosnargh site, which lies to the east of FP 6-9 FP7 (FP060 007 as taken from the Lancashire Definitive Map and shown on Figure 8 above) would have no effect upon this land which is considered to be more strongly distinct from both settlements and perceived as being central to the gap.

- 4.10. The visual separation is explored further below with reference to photographs from the following locations:
- Views from Whittingham Lane on the approach to Goosnargh
 - Views from Goosnargh Lane on the approach to Goosnargh

Viewpoint Photograph 6 - View from Whittingham Lane, looking north-east

- 4.11. Photograph 6 below, is taken from Whittingham Lane, near to public footpath FP 0609 015. It shows that on the approach to Goosnargh, existing housing on the western edge of the village is partially visible in the distance, with intervening hedgerows with trees filtering the views of built form.
- 4.12. The Goosnargh site is closely associated with the village. The Open Land Designation Study states: *“Land to the east of Public Rights of Way 6-9 FP4, 6-9 FP7 and 6-9 FP16 lies in relative proximity to Goosnargh/Whittingham; has a similar landform to that of the settlement; and has relatively weak boundary features between it and the settlement edge, with some resulting visual connection. The land therefore has a weaker distinction from Goosnargh/Whittingham”*.

- 4.13. When approaching Goosnargh on Whittingham Lane, views of proposed housing within the Goosnargh site would be visible in the context of the existing development edge. There would be no sense of reduction in the gap, as there is existing visible housing to the south of Whittingham Lane which extends as far west as the western site boundary. The site is not perceived as being central to the gap, and its close association with Goosnargh means that development within the site would not noticeably reduce the gap or alter the sense of separation.

Viewpoint Photograph 7 - View from Goosnargh Lane, looking south-east

- 4.14. In views from the approach to Goosnargh along Goosnargh Lane (see VP 7) large barns on the outskirts of the village and existing houses, located on Goosnargh Lane and Oaklea Close, are visible. Further housing is under construction on the outskirts of the village, shown on Figure 8 above.
- 4.15. The Goosnargh site lies behind this intervening built form and the vegetation growing alongside the road and within the surrounding farmland. Any proposed development within the site would be substantially screened in the views, with partial views of roof lines seen in the distance and in the context of the existing buildings. Should the Goosnargh site be developed, there would be no change to the sense of arrival within the village and no perceived narrowing of the gap.
- 4.16. The findings align with the following officers comments in relation to the previous application (ref 06/2020/1136): *“The proposed scheme would not result in the merging of the settlements of Goosnargh, Broughton and Grimsargh. As such, it is considered the effectiveness of the AoS gaps would be maintained. It is therefore considered that the proposal would not cause harm to the effectiveness of the AoS and would not conflict with (Policy EN4)”*.

04 Goosnargh - Appraisal of the site's contribution to the gap



Approximate extent of the site



PHOTOGRAPH 6 | View from Whittingham Lane looking north-east

Approximate extent of the site



PHOTOGRAPH 7 | View from Goosnargh Lane looking south-east

05 Summary and Conclusion



SUMMARY

- 5.1. The adopted Preston Local Plan (2015) shows the Broughton site as 'Open Countryside' (Policy EN1) but it currently does not fall within an Area of Separation (AoS). The site was identified as a preferred housing allocation (reference PC/HS 1.5) in the Central Lancashire Local Plan, Preferred Options Part One (Reg 18) Consultation (Dec 2022). However, it has been deallocated in the more recent Regulation 19 Publication Version and an AoS is now shown on the Central Lancashire Local Plan Policies Map Publication Version (Feb 2025) proposed between Broughton and Barton to the north, which washes over the subject site.
- 5.2. The adopted Preston Local Plan (2015) shows that the Goosnargh site falls within 'Open Countryside' (Policy EN1) and the 'Area of Separation' (Policy EN4) between Goosnargh, Whittingham and Grimsargh. Gladman have previously submitted a planning application (ref. 06/2020/1136) relating to this site and the officers report stated: *"The proposed scheme would not result in the merging of the settlements of Goosnargh, Broughton and Grimsargh. As such, it is considered the effectiveness of the AoS gaps would be maintained. It is therefore considered that the proposal would not cause harm to the effectiveness of the AoS and would not conflict with (Policy EN4)"*.
- 5.3. This report considers the role that the Broughton and the Goosnargh sites play in maintaining separation between the relevant settlements. It broadly follows the approach and criteria for assessing the landscape's role in settlement separation, as outlined in the Open Land Designation Study – Landscape Assessment (Oct 2022), and considers both the physical and visual role that intervening open land plays in preventing the merging of settlements.

- 5.4. The Open Land Designation Study includes Areas of Separation Assessments for the following areas within Appendix C:
 - Broughton and Barton
 - Broughton and Goosnargh
- 5.5. An OS map and aerial photograph are included for each of the areas. The aerial plans show a boundary which the key notes as 'Area within which settlement separation should be a consideration'. This is not to say that this a definitive boundary for the AoS, as the assessment highlights variations in contribution within the gap, with some areas being central to the gap and others more strongly associated with the settlements. It is also noted that the text describing the strength of each gap, and identifying key landscape elements only refers to a 'gap' and not an 'Area of Separation'.
- 5.6. The Central Lancashire Local Plan 2023-2041- Regulation 19 publication Version refers the 'Landscape Assessment' and *"a review of the boundaries of settlement gaps and consideration of the extent of land required to prevent coalescence of settlements"*. However, it is unclear where the evidence base is for this 'review of the boundaries of settlement gaps' as the Open Land Designation Study Area only goes as far as identifying the 'Area within which settlement separation should be a consideration' and does not provide definitive boundaries for the Areas of Separation which are supported by sound reasoning.

Broughton - Appraisal of the site's contribution to the Broughton and Barton gap

- 5.7. The report finds the following in relation to the contribution that the site makes to the gap between Broughton and Barton, and implications for development of the site:
 - In terms of physical separation, the Broughton site comprises a small proportion of the gap. Should it be developed, and included within the settlement boundary, there would be a relatively small loss of land within the gap and no coalescence between the two settlements.
 - The Open Land Designation Study (Appendix C) recognises that *"James Towers Way acts an outer boundary feature to the north-east and provides some sense of containment"*. The containment provided by James Towers Way around the northern and eastern site boundaries and the enclosure provided by the existing buildings to the immediate south and west of the site, mean that the site is strongly associated with the settlement of Broughton and separated from the open land by urban features.
 - The Open Land designation study states: *"Land lying between James Towers Way and Barton Brook is more strongly distinct from both settlements, being located some distance from both, and having less visibility towards either, and having some landform distinction (the shallow valley form of the two brooks). It is therefore perceived as being central to the gap"*. Any development within the Broughton site, which lies to the south of James Towers Way, would have no effect upon this land which is considered to be more strongly distinct from both settlements and perceived as being central to the gap.

05 Summary and Conclusion



- In views from the edge of Barton, the Broughton site is entirely screened by intervening vegetation and the rolling topography. The site makes no contribution to the open land between the settlements and does not form any visible edge.
- In views from the A6, north of the James Towers roundabout, the Broughton site is largely screened by intervening trees and it does not form an essential part of the gap.
- The roundabout is a transitional and urbanising element. At the roundabout there is a sense of leaving the rural gap and arriving at the urban edge when approaching Broughton from the north.
- The Open Land Designation Study states that land on the “northern edge of Broughton lies in relative proximity to the settlement edge; has a similar landform to that of the settlement; and has relatively weak boundary features between it and the settlement edge (formed predominantly of residential garden boundaries), with some resulting visual connection”. In views from Garstang Road, to the south of the roundabout, the site is visible in the context of the existing development edge. It is more closely associated with the settlement and does not form an essential part of the gap. If developed, there would be no sense of a reduction in the gap between the settlements as the perceived sense of arrival in Broughton is at the roundabout, before reaching the site.
- The Open Land Designation Study recognises: “The role of James Towers Way as a boundary to development along the northern eastern edge of Broughton”. The Broughton site lies within the land associated with Broughton, with the bypass providing separation from the open land to the north.

Goosnargh - Appraisal of the site’s contribution to the Broughton and Goosnargh gap

- 5.8. The report finds the following in relation to the contribution that the site makes to the gap between Broughton and Goosnargh, and implications for development of the site:
- The existing gap is wide. Should the Goosnargh site be developed, and included within the settlement boundary, there would be no perceived narrowing of the gap and no coalescence between the two settlements.
 - When travelling from Broughton to Goosnargh on Whittingham Lane, the sense of arrival in Goosnargh is marked by the existing housing located to the south of Whittingham Lane. Development within the Goosnargh site would not alter this sense of arrival, as development would not extend any further westward along Whittingham Lane.
 - When entering Goosnargh via Goosnargh Lane, the arrival point is marked by the housing under construction to the north of the Goosnargh site. Development within the Goosnargh site would not alter this sense of arrival or extend development further west.
 - The findings of this report align with the following officers comments in relation to the previous application (ref 06/2020/1136): “The proposed scheme would not result in the merging of the settlements of Goosnargh, Broughton and Grimsargh. As such, it is considered the effectiveness of the AoS gaps would be maintained. It is therefore considered that the proposal would not cause harm to the effectiveness of the AoS and would not conflict with (Policy EN4)”.

CONCLUSION

- 5.9. The Land Designation Study – Landscape Assessment (Oct 2022) considers the strength of each gap, and identifies key landscape elements within an ‘area within which settlement separation should be a consideration’. It does not define definitive areas of separation. There is a lack of evidence to support the boundaries defined as Areas of Separation on the Central Lancashire Local Plan Policies Map Publication Version Feb 2025.
- 5.10. The Broughton site lies within land associated with the settlement and as the Open Land Designation Study identifies, James Towers Way acts as a boundary to development along the northern edge of Broughton. The site does not contribute to the open land central to the gap between Broughton and Barton, and should not be included within the Area of Separation.
- 5.11. The Goosnargh site lies within land which the Land Designation Study identifies as being more closely associated with Goosnargh, and not perceived as being central to the gap between the settlements. Development within the site would not physically reduce the width of the gap, nor would it cause harm to the effectiveness of the gap. As such, there is no reason why the Goosnargh site should be included within the Area of Separation.

Appendix 1



Extracts of the Open Land Designation Study, Landscape Assessment (LUC - Oct 2022)



Settlement setting assessment

1.17 For each relevant village or larger settlement (refer to Chapter 3) this strategic assessment provides an overview of the settlement's character/identity and the extent to which its relationship with the surrounding landscape is important in contributing to that character. It also summarises key elements of that setting and concludes whether the landscape setting makes:

- a particularly important contribution to the character of a settlement;
- a reasonably important contribution to the character of a settlement; or
- a limited contribution to the character of a settlement.

1.18 This analysis is intended to determine whether an area-based policy identifying areas which are important to a settlement's setting, such as South Ribble Policy G4 (Protected Open Land), is appropriate in the joint Local Plan.

Areas of separation assessment

1.19 In South Ribble and Chorley, areas that are currently subject to area of separation policies (G5 and BNE4 respectively) all lie within the Green Belt and relate to towns. In Preston, however, areas of separation (policy EN4) have been defined between the main urban area and much smaller settlements. Therefore, it was agreed that the scope of this assessment would focus on settlements outside of the Green Belt within Preston.

1.20 This 'areas of separation' assessment focuses on the spatial separation of settlements, taking into consideration the presence of physical features that serve to either reduce or increase the perceived gaps between settlements. It provides an evaluation of the gap, followed by identification of any variations and provides an overall judgement on the strength of the gap, whether it is robust, moderate or fragile. The assessment also notes the key elements that contribute to the maintenance of the gap.

1.21 This analysis is intended to determine whether an area-based policy identifying areas of separation, to replace Preston's EN4, South Ribble's G5 and Chorley's BNE4, is appropriate in the joint Local Plan.



Areas of separation assessment

Approach

3.12 The assessment of the function of land in relation to settlement separation is distinct from consideration of the value of land either in relation to its innate qualities or to its role in enhancing the character/setting of a settlement. Land that lacks any particular valued qualities and/or that doesn't provide a notable contribution to settlement character may still play a role in maintaining separation between settlements.

3.13 This spatial role of landscape is already to an extent considered as part of the assessment of contribution to Green Belt Purpose 2, as set out in the separate Green Belt Assessment report, but that analysis is concerned with gaps between towns, rather than gaps between smaller settlements. Land forming gaps between smaller settlements that in turn contributes to the separation of towns will make some contribution to Green Belt Purpose 2, but gaps unrelated to towns will not.

3.14 Any settlement large enough to be defined as a village for the purposes of Preston's Local Plan Policy AD1(b), any larger settlements within or adjacent to the district boundary, and suburbs of Preston which are separated by land designated under policy EN5 as 'areas of major open space' were considered when defining settlement gaps for assessment. Any urbanising development between these settlements was also considered relevant when applying the assessment methodology (as set out in the paragraphs below). On this basis, gaps between the settlements listed below have been assessed. The assessed gaps are also indicated on **Figure 3.1**.

- Preston and Broughton
- Broughton and Barton
- Barton and Bilsborrow (Wyre Forest)
- Preston and Goosnargh/Whittingham

- Preston and Grimsargh
- Preston and Lea Town
- Lea Town and Clifton (Fylde)
- Preston and Woodplumpton
- Woodplumpton and Broughton
- Broughton and Goosnargh
- Goosnargh/Whittingham and Longridge (Ribble Valley)
- Grimsargh and Longridge (Ribble Valley)
- Within Preston, between the suburbs of Ingol/Tanterton and Greyfriars/Cadley
- Within Preston, between the suburbs of Sharoe Green and Fulwood.

Criteria for assessing landscape's role in settlement separation

3.15 The assessment has considered the strength of each gap, and identified key landscape elements, for example distinct physical features, areas of land or views, that contribute to the physical and perceived gap.

3.16 The principles of this assessment are the same as those employed in the assessment of NPPF Green Belt Purpose 2. The assessment has considered both the physical and visual role that intervening open land plays in preventing the merging of settlements, with reference to the following:

- Physical separation - considering the settlement form and edge; the width of the gap (as the crow flies); the presence of intervening urbanising development; and the presence or absence of separating features, such as rivers, railway lines or prominent topographical features.
- Visual separation - considering the presence or absence of landscape elements that either decrease or increase inter-visibility between



Chapter 3 Assessment Methodologies

settlement edges, such as woodland, hedgerows or intervening topography.

- Connection – considering the presence or absence of road routes that directly connect settlements; and the influence of any intervening urbanising development on the perceived sense of separation when travelling between settlements.

3.17 The size of the neighbouring settlements, relative to the size of the gap between them, is also a relevant factor in considering the relevance of land to the purpose of preventing settlement coalescence.

Making judgements on settlement gap strength

3.18 With reference to the guideline criteria below, a judgement has been made on the strength of the gap, using the following definitions:

Fragile gap strength

Criteria:

- Open land lies within a gap between settlement which is distinct but narrow in relation to the size of the settlements; or
- Open land lies in a gap between settlements which is moderate in relation to their size but it lacks strong separation from one or both of them, or the gap is diminished by intervening development.

Moderate gap strength

Criteria:

Chapter 3 Assessment Methodologies

- Open land lies in a gap which is moderate in relation to the size of the settlements, and which has significant separating features; or
- Open land lies in a wider gap between settlements but which lacks significant separating features, or which is diminished by intervening development; or
- Open land lies in a narrow gap between settlements, but they are already connected to a degree that limits the role of open land in preventing coalescence.

Robust gap strength

Criteria:

- Open land lies in a gap between settlements which is wide in relation to their size, with significant separating features.

3.19 The supporting analysis also comments on significant variations in contribution within the gap – such as identifying whether there are areas adjacent to one or other of the settlements that make a weaker contribution.

Sources of evidence

Published information

3.20 The assessment has drawn on a range of evidence, including:

- The Landscape Strategy for Lancashire (2000);
- The Lancashire Historic Landscape Characterisation (2017);
- CPRE Light Pollution mapping and tranquillity mapping;



Chapter 3 Assessment Methodologies

- National and local datasets for landscape, cultural heritage, biodiversity and recreational designations.
- Conservation Area statements/appraisals.

Field verification

3.21 A structured process of field survey verification has been undertaken by landscape environment experts in order to test and refine the outputs from the initial desk study. Visits have been made to each identified LCA and to any sub-areas identified on the basis of significant variations in landscape qualities. Visits were also made to support the assessment of settlement settings and gaps. The field survey has been undertaken from roads and public rights of way.

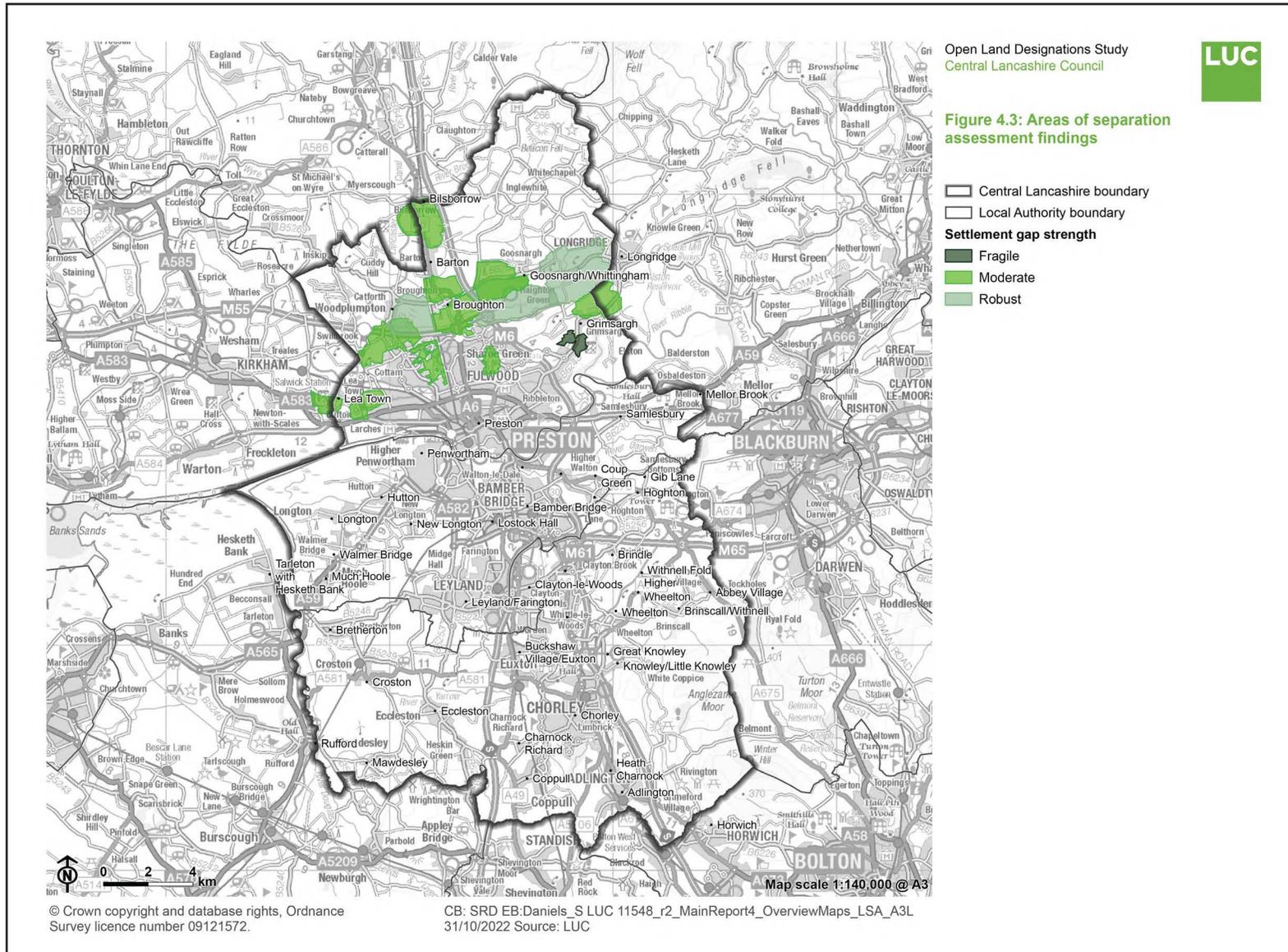
Chapter 4 Assessment Findings

Table 4.3: Areas of separation assessment findings

Settlement gap	Gap strength
Preston and Broughton	Moderate
Broughton and Barton	Moderate
Barton and Bilsborrow (Wyre Forest)	Moderate
Preston and Goosnargh/Whittingham	Robust
Preston and Grimsargh	Fragile
Preston and Lea Town	Moderate
Lea Town and Clifton (Fylde)	Moderate
Preston and Woodplumpton	Moderate
Woodplumpton and Broughton	Robust
Broughton and Goosnargh	Moderate
Goosnargh/Whittingham and Longridge (Ribble Valley)	Robust
Grimsargh and Longridge (Ribble Valley)	Moderate
Within Preston, between the suburbs of Ingol/Tanterton and Greyfriars/Cadley	Moderate
Within Preston, between the suburbs of Sharoe Green and Fulwood Row.	Moderate

4.7 The majority of the settlement gaps were found to be moderate in strength. Only one settlement gap – that between Preston and Grimsargh – was found to be fragile, and two gaps – between Woodplumpton and Broughton and between Goosnargh/Whittingham and Longridge – were found to be robust.

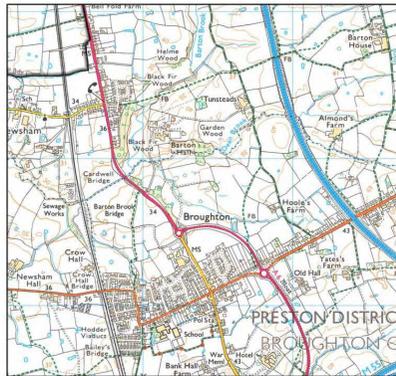
Appendix 1





Appendix C Areas of separation assessment

Broughton and Barton



Broughton - Barton

- Central Lancashire boundary
- Area within which settlement separation should be a consideration
- Other constraints**
- Preston Historic Designed Landscape
- National Cycle Network
- Public Right of Way
- Grade II Listed building



Appendix C Areas of separation assessment

Physical separation

Broughton and Barton are villages located to the north of the Preston within Preston District. The main area/centre of Broughton is formed by relatively dense development concentrated along the east-west axis of Whittingham Lane/Woodplumpton Lane (B5269). The northern edge of the village is defined largely by residential garden boundaries and remnant field boundaries. Barton is located to the north of Broughton and is a north-south linear village extending predominantly along Garstang Road (the A6). The southern extent of the settlement and is bounded by mature woodland of Black Fir Wood and the valley form of Barton Brook.

The gap between Broughton and the Barton is between approximately 900m and 1.2km, which is moderate in size compared to the size of both villages. The gap comprises open countryside with little to no intervening urbanising development. There are a number of significant separating features within the gap: Barton Brook and Dean Brook, and their associated shallow valley forms and vegetation; and Several woodlands, including Black Fir Wood, Garden Wood and woodland belts along Garstang Road.

Visual separation

The woodland cover, together with numerous hedgerows and mature hedgerow trees delineating fields and gently rolling topography, provide a good level of visual separation, with intervisibility between the two settlements being very limited. The James Towers Way bypass (single carriageway forming part of the A6) forms another separating feature in proximity to the north-eastern edge of Broughton.



Appendix C Areas of separation assessment

Connection

There is also a strong perceived sense of separation when travelling between the two settlements along Garstang Road and the James Towers Way bypass (A6). The linear distance between the settlements along these routes is approximately 920m and 1km respectively. A relative lack of intervening development and views across the adjacent open countryside available from both routes provides a strong sense of rural separation between the two settlements. The West Coast Main Line forms a direct route between the two settlements along the western periphery of the gap, although neither village has a station.

Variations in contribution within the gap

The following variations within the gap are noted:

- Land on the north-western edge of Broughton and the retained area of open land between the north-eastern settlement edge and James Towers Way has a visual connection with the settlement edge. James Towers Way acts an outer boundary feature to the north-east and provides some sense of containment. The land therefore has a weaker distinction from Broughton (that is, it is more strongly related to the settlements than the open countryside to the north).
- Land lying between James Towers Way and Barton Brook is more strongly distinct from both settlements, being located some distance from both, and having less visibility towards either, and having some landform distinction (the shallow valley form of the two brooks). It is therefore perceived as being central to the gap.
- Land on the south-western edge of Barton and northern edge of Broughton lies in relative proximity to the settlement edge; has a similar landform to that of the settlement; and has relatively weak boundary features between it and the settlement edge (formed predominantly of

Appendix C Areas of separation assessment

residential garden boundaries), with some resulting visual connection. The land therefore has a weaker distinction Barton.

Conclusion on strength of gap

Overall, the strength of the gap between Broughton and Barton is considered to be **moderate**.

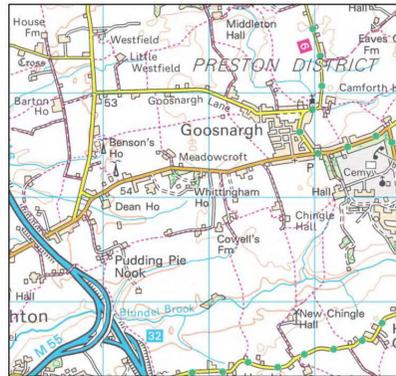
The following key elements contribute to the maintenance of the gap:

- The role of James Towers Way as a boundary to development along the northern eastern edge of Broughton.
- The role Dean Brook and Barton Brook and several woodlands as significant separating features.
- The visual separation provided by the gently rolling topography and intervening vegetation.
- The lack of intervening urbanising development and open views across the surrounding farmland when travelling between the two settlements along Garstang Road.



Appendix C Areas of separation assessment

Broughton and Goosnargh



Broughton - Goosnargh/Whittingham

- Central Lancashire boundary
- Area within which settlement separation should be a consideration
- Absolute constraints**
- Scheduled Monument
- Other constraints**
- Preston Historic Designed Landscape
- National Cycle Network
- Public Right of Way
- Grade II* Listed building
- Grade II Listed building



Appendix C Areas of separation assessment

Physical separation

Broughton and Goosnargh/Whittingham are villages located to the north and north-east of Preston respectively. The main area/centre of Broughton is formed of relatively dense development concentrated along the east-west axis of Whittingham Lane/Woodplumpton Lane (B5269). To the east of this there is a long continuous stretch of ribbon development along Whittingham Lane, extending east beyond the M6 Motorway as far as Dean Brook. Goosnargh lies to the east of Broughton further along Whittingham Lane. The western edge of the village is formed primarily of domestic garden boundaries and remnant field hedgerow boundaries. There is an ongoing development on the western edge of Broughton, off Bamford Road to the south of Whittingham Lane and west of Pudding Pie Nook Lane; this has been considered within the following assessment (that is, the land is assumed to be developed). There is also currently an ongoing Planning Inquiry for a number of proposed development sites around Goosnargh, two of which are on the southern edge of the village and lie within the gap - Goosnargh Cottage (Appeal A) and South of Whittingham Lane (Appeal B); as these are still to be determined they have not been considered within the assessment.

At its narrowest, the gap between Broughton and Goosnargh is approximately 1.9km as the crow flies (measured between the Dean Brook boundary of Broughton and the western settlement edge of Goosnargh). This gap is wide in comparison to the size of both villages, and contains Dean Brook and its shallow valley, which defines the eastern extent of Broughton and provides a separating feature between the two settlements. The M6 motorway runs north-south through Broughton largely on embankment. Whilst this outside the gap to the west and development in Broughton extends beyond it (as described), it forms a significant separating feature to the east of the main area of the village which increases a sense of separation. The gap contains some ribbon development along Whittingham Lane, Langley Lane and Goosnargh Lane, which diminishes the sense of physical separation to some extent.



Appendix C Areas of separation assessment

Visual separation

The landscape within the gap comprises undulating farmland defined by hedgerows with occasional hedgerow trees. Dean Brook and a tributary of Blundell Brook to the south are also relatively well-treed. This creates a strong sense of visual separation between the two settlements, with very limited inter-visibility between them.

Connection

Whittingham Lane provides a direct road route between the two settlements, which equates to a linear distance of approximately 1.9km. A longer route is also available via Langley Lane and Goosnargh Lane to the north. Whilst there is ribbon development along these routes, large gaps between the areas of development allow views across the adjacent open countryside and this provides a strong sense of rural separation.

Variations in contribution within the gap

The following variations within the gap are noted

- Land lying between Pudding Pie Nook Lane and Dean Brook to the east lies in close proximity to the edge of Broughton (including the ongoing development off Bamford Road) and has some visual connection with the settlement edge. The land therefore has a weaker distinction from Broughton (that is, it is more strongly related to the settlement than the open countryside) than land further to the east.
- Land between Langley Lane/Pudding Pie Nook Lane and Public Rights of Way 6-9 FP4, 6-9 FP7 and 6-9 FP16 (in the vicinity of Chingle Hall and Swainson's Farm) is strongly distinct from both Broughton and Goosnargh/Whittingham, being located some distance from, and having limited views towards, both settlements; and having some landform

Appendix C Areas of separation assessment

distinction (the shallow valley form of Dean Brook and tributary of Blundell Brook). It is therefore perceived as being central to the gap.

- Land to the east of Public Rights of Way 6-9 FP4, 6-9 FP7 and 6-9 FP16 lies in relative proximity to Goosnargh/Whittingham; has a similar landform to that of the settlement; and has relatively weak boundary features between it and the settlement edge, with some resulting visual connection. The land therefore has a weaker distinction from Goosnargh/Whittingham.

Conclusion on strength of gap

Overall, the strength of the gap between Broughton and Goosnargh/Whittingham is considered to be **moderate**.

The following key elements contribute to the maintenance of the gap:

- The visual separation provided by hedgerow trees and tree cover along Dean Brook and the M6 embankments.
- The role of Dean Brook as a separating feature on the eastern edge of Broughton.
- The landform distinction created by the shallow valley of the Dean Brook.



Beehive Lofts
Beehive Mill
Jersey Street
Manchester
M4 6JG

+44 (0)161 228 7721
mail@randallthorp.co.uk

randallthorp.co.uk