

# Land off Garstang Road, Bilsborrow, Preston, PR3 5AD

Proposed allocation for residential development

**REPRESENTATIONS ON CENTRAL LANCASHIRE LOCAL PLAN  
REGULATION 19 CONSULTATION**

APRIL 2025



# REPORT CONTROL

<b>Document type</b>	Representations on Central Lancashire Local Plan Regulation 19
<b>Project</b>	Land off Garstang Road, Bilsborrow, Preston, PR3 5AD
<b>Job Number</b>	25-2354

## Document Checking

<b>Primary Author</b>	Lydia Harper
<b>Contributor</b>	
<b>Reviewer</b>	Joshua Hellowell

## Revision Status

<b>Issue</b>	<b>Date</b>
DRAFT	19.03.25
FINAL	11.04.2025



# CONTENTS

---

<b>1</b>	<b>INTRODUCTION</b>
<b>2</b>	<b>THE SITE</b>
<b>3</b>	<b>SITE ALLOCATION IN THE DRAFT PLAN</b>
<b>4</b>	<b>CENTRAL LANCASHIRE DRAFT LOCAL PLAN</b>
<b>5</b>	<b>PROPOSED ALLOCATION OF SITE</b>
<b>6</b>	<b>CONCLUSIONS</b>

---



## **/1 INTRODUCTION**

- 1.1. PWA Planning has been commissioned by Seddon Homes to prepare representations in relation to a parcel of land located to the east of Garstang Road, Bilsborrow. The aim of the representations is to demonstrate that the site is suitable for residential development with a view to it being allocated for housing in the Central Lancashire Local Plan.
- 1.2. The Three Central Lancashire Authorities are currently undertaking a consultation on the preparation of a Joint Local Plan for Central Lancashire including Chorley Borough Council, South Ribble Borough Council, and Preston City Council, as part of the Regulation 19 consultation. The consultation process is running until midnight on Monday 14<sup>th</sup> April 2025. As part of this consultation PWA have identified a significant shortfall in the proposed allocations in the draft Plan which only cover 80% of the identified housing requirement, and Chorley's inability to demonstrate a 5-year housing land supply. PWA are promoting a series of sites to be considered for allocation for development in the emerging Local Plan. This Statement covers one of these sites.
- 1.3. These representations should be read in conjunction with the following supporting documents:
  - Location Plan
  - Transport Statement
  - Illustrative Masterplan
  - LVIA
- 1.4. This document intends to provide an overview of the site and further illustrate why the site should be taken forward as a preferred option and allocated for development within the Local Plan period.



## /2 THE SITE

### Introduction

- 2.1. The site is located to the east of Garstang Road (A6) and immediately to the south of the settlement of Bilsborrow, Preston. The site is made up of agricultural land, constituting three individual fields in total. The site area covers approximately 6.88 hectares, of which 3.07ha will be occupied by the proposed residential development.
- 2.2. The site is bordered predominantly by agricultural land to its south and east, though is directly bound by a residential lodge park and its associated access drive. To the north the site abuts Bacchus Brook, beyond which are the properties situated along Bilsborrow Lane, a local bowling green and a hotel. To the west is the A6 – Garstang Road which is major gateway in and out of both Preston to the south and Lancaster to the north. An existing residential dwelling is present in an indent to the south-west corner of the site.
- 2.3. A location plan showing the site within its wider setting is provided with the supporting documents (drawing no. 8992-L-04) and for an aerial image of the site within its closer setting please see Figure 1 below:



*Figure 1: Aerial Image of the site (Source: Google Earth (not to scale)).*



### Planning History

2.4. A search of Preston City Council's planning register has been carried out to understand the site's planning history. The site was subject to two recent applications for residential development under application references 06/2020/1087 and 06/2019/1244, which sought permission for 100 and 105 homes respectively. The former was a resubmission of the initial application, with modifications which looked to respond to the previous application which was refused on the 7<sup>th</sup> of February 2020. However this application was also refused, on the 11<sup>th</sup> of January 2021, on the basis of the two below reasons for refusal:

1. The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. The proposal fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy and consequently would lead to the unplanned expansion of the rural village of Bilsborrow, which has a limited number of services and facilities. Furthermore the proposed development is not the type of development deemed permissible in the open countryside under Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to Policy 1 of the Central Lancashire Core Strategy and Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies).
2. The proposed development of this site would significantly extend the settlement boundary of Bilsborrow south in to an area of the open countryside that represents the clear transition between the settlement of Bilsborrow and the rural nature of the surrounding area. The proposed development would appear isolated and detached from the main built form of the nearby settlement and large sections of the site and development would be highly visible from public vantage points along the A6 and the adjacent Public Right of Way. The development of this site would therefore fail to conserve, retain and provide an appropriate transition from the built development into the open countryside and have an unacceptable visual impact upon the landscape character of the area which is contrary to Policy 21 of the Central



Lancashire Core Strategy. The proposal is also contrary to the National Planning Policy Framework which requires planning decisions to contribute to the local environment by recognising the intrinsic character and beauty of the countryside.

- 2.5. The applicant continues to contend that the application ought to have been approved and that the above reasons are not representative of the development's impact or how it would be read in the context of the local and wider landscape. For this reason Seddon Homes continue to promote the site as part of the Local Plan process.
- 2.6. Whilst the form of development has scope for variation it's worth noting that as part of the aforementioned submissions that an indicative masterplan for the site was produced. An extract of this plan is included below in Figure 2.



**Figure 2:** Extract of Indicative Masterplan from planning application ref 06/2020/1087 detailing 100 houses on the site



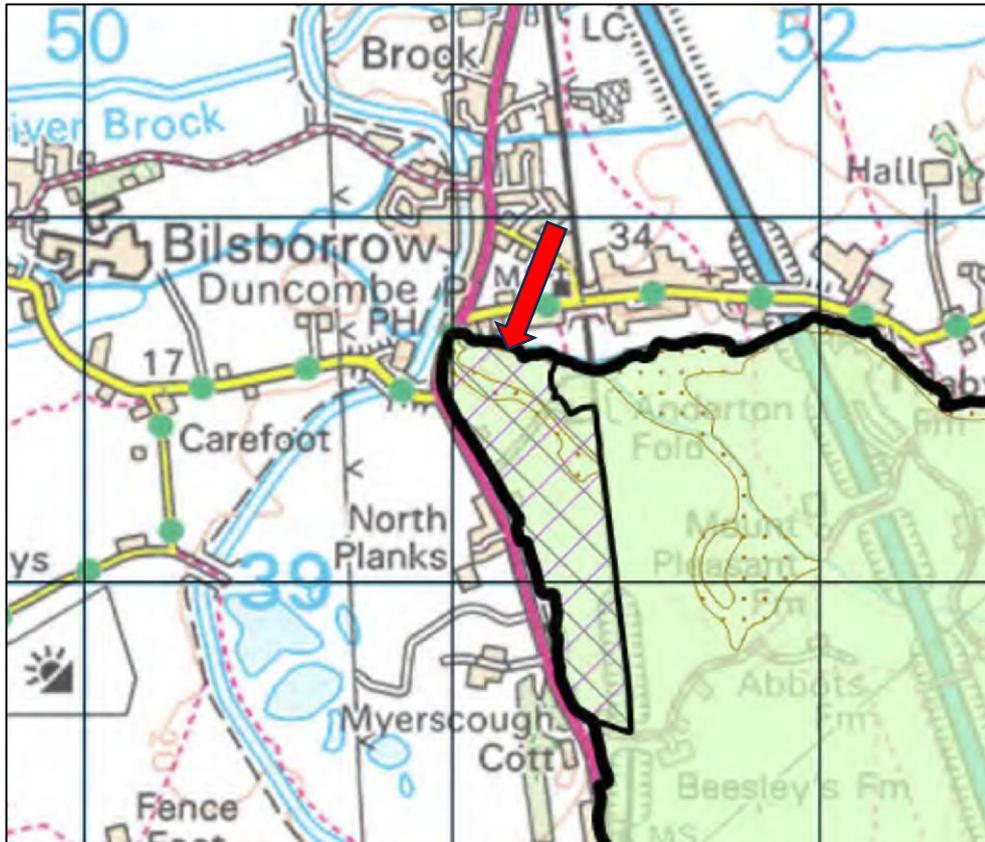
### Site Description

- 2.7. The site is open and completely vegetated with no existing buildings on the site. Land levels vary across the site with there being a gently slope toward a watercourse which exists to the northern boundary. Access to the site is currently taken from a private track running along the southern boundary of the site which primarily serves the existing residential lodge park. Two farm access gates into the site are located off the track which also forms part of a Public Right of Way that runs from the southern boundary of the site to the residential lodge park to the east of the site connecting the site directly to Bilsborrow Lane to the north.
- 2.8. Given that the site is located immediately to the south of the settlement of Bilsborrow, the site is well located for access to a variety of local services and amenities. This includes Bilsborrow John Cross Primary School and the local Post Office both of which are within 500 metres of the site. Public transport connections lie close to the site, with the nearest bus stop, Roebuck, located within 75 metres of the north of the site, providing regular services to larger settlements namely Preston, Garstang and Lancaster. Other facilities which are located nearby include the Premier Inn Hotel; St Hilda's Church; the Village Hall; a cricket pitch; two bowling greens; the Barton Grange Garden Centre, and a plethora of pubs and restaurants, whilst the M55 and M6 junctions are both within 5 miles of the site.
- 2.9. There are no listed buildings on the site itself or nearby, nor does the site lie within any nationally or locally designated landscape or ecological areas. Mineral Safeguarding is present on the site. TPO's are also present on the north-west boundary of the site where the site borders the Premier Inn Hotel. A large part of the northern portion of the site is partially located within Flood Zone 3, where there is a higher risk of flooding.



### /3 SITE ALLOCATION IN THE DRAFT PLAN

3.1 The site is allocated in the draft plan as Open Countryside and within an Area of Separation as can be seen in Figure 3 below. As such draft policies EN17 and EN18 apply.



**Figure 3:** Extract from Draft Central Lancashire Local Plan. Site location indicated with red arrow

- 3.2 Policy EN17 is a highly restrictive countryside policy that significantly limits the scope for new development outside settlement boundaries. The general presumption is against development unless it falls within a narrow set of exceptions, such as rural exception housing, rural worker dwellings, conversions, essential infrastructure, or agriculture/forestry-related schemes.
- 3.3 NPPF 2024 does not require the countryside to be protected for its own sake, but policy EN17 still applies a high level of protection without distinguishing between designated valued landscapes (which deserve stronger protection) and general countryside areas, which can accommodate sustainable development. In this regard, policy EN17 applies an approach that is more restrictive than national Green Belt policy, which is excessive.



- 3.4 Policy EN17 states that all proposals must not "have a harmful effect on the character of the countryside" which imposes a highly subjective test and is too rigid potentially blocking appropriate and well-designed development.
- 3.5 Policy EN17 is more restrictive than national policy in practice. The NPPF supports the protection of the countryside for its intrinsic character and beauty, and promotes sustainable patterns of development. However, it also encourages rural communities to thrive and grow.
- 3.6 In summary, policy EN17 is notably restrictive in scope, with a strong emphasis on landscape protection and a presumption against development outside settlement boundaries unless narrowly defined exceptions apply. While this does reflect the protective aims of the NPPF, it risks being *inflexible* and *inconsistent* with the NPPF's broader support for sustainable rural growth, reuse of buildings, and rural housing to maintain community vitality.
- 3.7 The NPPF 2024 is clear that local plans must "significantly boost the supply of housing" and be informed by robust evidence of housing needs. Central Lancashire, and Preston in particular, is currently only planning to meet 80% of identified housing need, a shortfall that contradicts national policy.
- 3.8 The introduction of an Area of Separation (Policy EN18) covering most of the gap between Bilsborrow and Barton is a surprising inclusion and one which in general is not considered necessary or certainly not in its current extent.
- 3.9 Barton is a linear settlement and the same is applicable to Bilsborrow, hence in a situation which the settlement is subject to minor expansion, its likely to be directly south or north of the existing settlement and the policies in this plan should accommodate for that. Indeed the allocation does achieve this with regard to Barton, given a large swathe of land north of the settlement, between the car centre (adjacent to the junction with White Horse Lane) and Green Lane, is both outside of the settlement boundary and not included within the area of separation. However no such provision is afforded to Bilsborrow. Whilst it is of course noted that Bilsborrow is a settlement within a different authority, its boundary does abut Preston City Council and therefore clearly the best way for the Local Plan to aid in managing the growth of Bilsborrow is to offset the proposed area of separation from the boundary with the settlement, in a comparable nature to that done with Barton. In this



instance we believe such a revision should result in the site promoted by Seddon Homes being outside the allocation.

- 3.10 In the coming years Wyre Borough Council will be revisiting their own Local Plan. In advance of this and in response to the NPPF (2024), they have already highlight the different options for growth that they are considering. One of which is to focus growth on the A6 Corridor and another is to promote appropriate growth across all the borough. In either situation it is important that the Central Lancashire authorities do not unduly restrict the growth of Bilsborrow, through the heavy handed use of allocations such as the area of separation in discussion. Especially where such an allocation could be made which does not prohibit Bilsborrow from accommodating a suitable amount of growth across the life of the Plan.
- 3.11 A revised designation would likely bolster the weight attributed to Policy EN18 in the determination of planning applications, given they would be allowing for a relative level of growth whilst understandably protecting against the merging of settlements. The policy is clear that development can still be permitted whereby it doesn't undermine the spaces between settlements and the character of the countryside and local settlements. Seddon Homes are of the position that a development on the land in question could be achieved without compromising the aforementioned receptors. Consequently if a development of the scale previously proposed could be approved within such designation, it again suggests the extent of the allocation is excessive and should be limited to land which clearly is more sensitive to development and valuable as a strategic gap. Placing the Local Authority in a position whereby they consent to major development within an area of separation would undermine all similar allocations and as such it is vital the extent of them are well considered and defensible.
- 3.12 The site is sustainably located, lying adjacent to the existing built-up area of Bilsborrow and within walking distance of local services, including shops, schools, and public transport links. This ensures that future residents will be well-connected and have access to essential day-to-day facilities without reliance on the private car, consistent with the sustainability principles of national policy. Its development would constitute a logical and sustainable extension to the village, with good access to services, local schools, and public transport.
- 3.13 In physical terms, the site is well-contained by existing development and landscape features. Post development, its clear that the site would be read as part of the built form of Bilsborrow, while existing hedgerows and tree lines contribute to a natural defensible



boundary that would limit visual encroachment into the wider countryside. This containment ensures that development here would not lead to sprawl or an unacceptable loss of rural character.

- 3.14 Allocating the site for housing would contribute to meeting identified shortfalls in a sustainable, plan-led manner, while preventing future speculative development elsewhere.
- 3.15 Retaining the countryside designation would hinder sustainable development and compromise the Plan's ability to meet housing needs in accordance with national planning policy. Equally the extent of the area of separation of unjustified and only serves to stifle the appropriate growth of Bilsborrow. The site should therefore be de-allocated as open countryside and removed from the area of separation and instead be formally allocated for residential development in the new Central Lancashire Local Plan. This would reflect the site's current character, support housing delivery in a sustainable location, and help ensure the Plan's soundness at examination.



## **/4 CENTRAL LANCASHIRE DRAFT LOCAL PLAN**

- 4.1 As part of the consultation process, we have reviewed the draft Plan and have provided representations under separate cover. In relation to this site and the representations we have made it is thought that additional allocations in Preston City Council should be welcomed. A summary of the representations is provided below.

### Spatial Vision

- 4.2 PWA highlights that while the Plan supports economic growth, it lacks a strong, consistent link to the corresponding need for housing growth. The proposed allocations fall short of meeting the full housing requirement, only covering 80%, and there's an over-reliance on existing urban areas, with limited new site allocations and no full Green Belt review. This restrictive approach risks undermining housing delivery and contradicts the National Planning Policy Framework (NPPF) 2024, which seeks to significantly boost housing supply. Preston is only proposing to allocate 80% of its housing need which, whilst a lawful route, is not consistent with the emphasis on increasing housing delivery noted within the NPPF 2024. Additional sites are required for housing of which this site is suitable for reasons explained further in this Statement.

### Strategic Objectives

- 4.3 PWA recommends that several Strategic Objectives in the Plan be reworded to better align with the need for increased housing delivery and the principles set out in the NPPF 2024. Strategic Objective 3, relating to Sustainable Communities, should be more clearly focused on delivering a sufficient supply of homes and explicitly reference the Government's aim to significantly boost housing supply. The objective should express a clear intention to meet all housing needs as a fundamental part of supporting economic growth and sustainable communities, particularly in light of identified shortfalls such as Chorley's 2.94 year land supply.
- 4.4 Similarly, Strategic Objective 4 on Economic Prosperity should be revised to emphasise the intrinsic link between economic success and adequate housing provision. PWA argues that employment growth must be matched by a diverse and sufficient housing supply in order to attract and retain skilled workers, reduce commuting pressures, and ensure long-term



economic sustainability. Housing and economic objectives should be pursued in tandem, reflecting evidence in the Housing Need Statement which confirms the requirement for each authority to meet its own housing need.

- 4.5 Lastly, Strategic Objective 9 concerning the Natural Environment should be reworded to ensure that the need to conserve and enhance landscapes and biodiversity is properly balanced with the need to deliver new development. While protecting the environment is important, it should not be seen as being in conflict with sustainable growth. The allocation of this site as open space would restrict any future development yet the recent housing developments in the immediate area have changed the function and character of the local area.

#### Spatial Strategy

- 4.6 PWA considers the proposed spatial strategy to be insufficient in supporting sustainable growth, noting that the Plan allocates land for only 80% of the identified housing need, which risks undermining both economic development and housing affordability.
- 4.7 The strategy fails to align with the aims of the NPPF 2024, particularly its requirement to significantly boost housing supply. Policy SS1 overly depends on previously allocated sites and does not introduce enough new allocations, lacking contingency if those sites under-deliver.
- 4.8 To address these issues and align with the NPPF 2024, PWA recommends increasing housing allocations to fully meet local needs, carrying out a full Green Belt review, distributing growth more evenly across the region, and revising Policies SS1 and SS2 to enable, rather than restrict, housing delivery. These actions are essential given the clear shortfalls identified in the Housing Need Statement and Draft Housing Land Supply Assessment.

#### Balanced Housing Growth Market (Chapter 4)

- 4.9 PWA considers that Policy HS1 fails to meet the requirements of the NPPF 2024, particularly the need to significantly boost housing supply. The policy plans for only 80% of the identified housing need, which is inadequate and risks worsening affordability and limiting



economic growth. It also lacks flexibility as there is no clear mechanism to bring forward additional sites if current allocations fail to deliver, creating a risk of long-term under-supply.

- 4.10 To make Policy HS1 sound, PWA recommends increasing housing allocations to fully meet Local Housing Need (LHN), building in flexibility to release additional sites if needed and allocating this site at for housing.

#### Summary

- 4.11 In summary, PWA submits that the draft Plan, while making positive steps toward supporting economic growth, does not go far enough in addressing the pressing need for housing delivery. The proposed approach, allocating only 80% of the identified housing need, falls significantly short of national policy expectations and undermines the Plan's credibility and deliverability.
- 4.12 A failure to fully meet housing need not only risks worsening affordability and constraining economic growth, but also places undue reliance on a limited number of existing sites, with little flexibility should these fail to come forward.
- 4.13 Strategic Objectives should be revised to reflect the fundamental link between housing delivery and sustainable economic development, ensuring that the Plan clearly prioritises meeting local housing needs.
- 4.14 The Garstang Road, Bilsborrow site represents a logical and deliverable solution to help meet Preston's unmet housing need. Its allocation would support the objectives of the NPPF 2024, help deliver a more balanced spatial strategy, and respond to the evolving character of the local area. PWA urges the Council to positively consider additional housing allocations, including the site at hand, to ensure the soundness of the Plan and deliver genuinely sustainable growth for the region.



## **/5 PROPOSED SITE ALLOCATION**

- 5.1 As demonstrated by the preceding text, the site has the potential to deliver in the region of 100 new homes. No environmental or technical issues have been identified which would preclude residential use. In short, the site is suitable, available and deliverable, and would comprise an appropriate housing allocation.
- 5.2 The previous application was met with no objection from, LCC Highways, Education, Waste Management, United Utilities, Crime Officer, Tree Officer, Environmental Health, PRoW Officer, Environment Agency, County Education, Canal and River Trust, Greater Manchester Ecology Unit and County Archaeology. As such, there were no technical objections to the application and the reasons for refusal were limited to the opinion that the scheme was unacceptable in principle and in its landscape impact. These are matters which Seddon Homes continues to contest and rather maintains that bringing this site forward for housing allocation would result in a number of beneficial planning outcomes. Firstly, it would support the sustainable growth of Bilsborrow by ensuring that the village continues to thrive and maintain the critical mass necessary to support local services and infrastructure. Housing developments on the edge of rural settlements, such as this, are widely acknowledged in national policy as important contributors to housing supply and rural vitality.
- 5.3 Secondly, allocating the site would directly assist in addressing the Central Lancashire authorities' significant housing shortfall. With the current draft Local Plan only proposing to allocate sites to meet 80% of the local housing need, and with the current inability to demonstrate a five-year housing land supply, there is a clear and urgent requirement for additional sustainable sites to come forward. This site can help to meet that need in a deliverable and well-planned manner and ensure the 80% delivery is realistic.
- 5.4 Finally, reallocating this site from Open Countryside and within an area of Separation to residential use would help to ensure the emerging Local Plan is both sound and legally compliant. It would reflect the requirements of the National Planning Policy Framework to significantly boost the supply of homes, plan positively to meet development needs, and provide a range of sites in sustainable locations. In doing so, the allocation of this site would strike an appropriate balance between protecting the countryside and meeting the pressing need for housing in Central Lancashire.



## /6 CONCLUSIONS

- 6.1 As demonstrated in the supporting assessment work for this document, the site has the potential to deliver approximately 100 new homes to contribute to the housing supply for Preston, with no environmental or technical issues identified which would preclude residential use.
- 6.2 The previous decision for the site at hand affirms that the site is suitable from a technical perspective and sustainably located. Seddon Homes are happy to reaffirm the site is deliverable and that they have significant appetite to deliver the scheme and aid Preston and Wyre in meeting its needs.
- 6.3 In the context of Central Lancashire's housing supply shortfall and the under delivery of affordable housing, this site should be allocated for residential development in the emerging Local Plan.
- 6.4 The site therefore is considered to represent an appropriate location for development and reconsidering the site as a housing allocation offers significant benefits:
- **Contribution to Housing Supply** – Land east of Garstang Road would make a meaningful contribution to meeting Central Lancashire's housing need, at a time when the draft plan proposes to allocate for only 80% of the full Local Housing Need (LHN) and the three authorities have struggled to maintain a 5-year supply of deliverable housing sites. NPPF 2024, para 60–74 places a clear emphasis on significantly boosting the supply of homes. The site is available, suitable, and deliverable, and can make an early and impactful contribution to housing delivery in the early years of the new plan.
  - **Sustainable Village Growth** - Development at this location would support local services and facilities, helping to maintain their viability, which aligns with rural sustainability goals.
  - **Logical Extension of Bilsborrow** – The site lies immediately adjacent to the existing built-up area of Bilsborrow, is physically and visually well-contained by existing development and landscaping. The site is a strategically logical allocation, avoiding the risks of dispersed or poorly connected growth elsewhere.



- **No Technical or Environmental Constraints** - The previous planning decision showed that there were no technical reasons for refusal, with impacts on ecology, flood risk, transport and environmental health all being adjudged as acceptable.

6.5 It is requested that the site be considered for allocation for housing in this stage of the Local Plan process.



2 Lockside Office Park  
Lockside Road  
Preston  
PR2 2YS

01772 369 669

[www.pwaplanning.co.uk](http://www.pwaplanning.co.uk)

