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14th April 2025

To whom it may concern,

REPRESENTATIONS ON CENTRAL LANCASHIRE LOCAL PLAN REGULATION 19 CONSULTATION REGARDING PROPOSED ALLOCATION HS3.2: APSLEY HOUSE, FARINGTON.

PWA Planning has been instructed by Northern Trust to make representations on the Regulation 19 Consultation on the Central Lancashire Local Plan 2023-2041 Publication Version in relation to a parcel of land located to the east of Church Lane, Farington (the Site). The Site forms part of a draft housing allocation in the Publication Version documents, site ref. HS3.2.

It is our view that the Site should be allocated for housing in the forthcoming Central Lancashire Local Plan (CLLP). The details contained within these representations demonstrate that the Site is suitable for this use. These representations also address some of the specific technical points raised in the assessment of the Site in the Regulation 19 documentation.

Site Overview And Background

This submission relates to the portion of the aforementioned proposed allocation, which is under the control of Northern Trust. This is the portion of the land which sits east of Church Lane and south of the railway line, see overpage for the relevant land holding boundary.





Figure 1: Land boundary

The site extends to approximately 7.65ha and sits to the immediate south of Coot Lane in the locality of three settlements in the borough of South Ribble; Lostock Hall to the east, Farington Moss to the south and Whitestake to the east. The site currently comprises agricultural land split into two fields with a belt of tree cover to the south.

The site is bound to the north by Coot Lane which extends to the north-east into the centre of Lostock Hall, with access to the services of the village centre. An existing railway line connecting Preston and Lostock Hall stations is located to the eastern boundary of the site, alongside the Preston to Liverpool railway line to the west. Existing residential development is situated to the south of the site forming properties on St Paul's Close, School Lane, Hillside Avenue and Church Lane. The main settlement of Lostock Hall is located to the east of the site, which forms a large suburban village with a variety of facilities mainly located on Watkin Lane. To the south of the site is the village of Farington Moss which is a village providing a level of existing residential development alongside some amenities.

The site comprises two large open fields that are currently a greenfield that are not currently in use. A large portion of the southern section of the site is covered in mature trees and there is also a row of trees/hedgerow delineating the two fields, alongside a group of trees along the northern and north western boundary. To the south west of the site, is the existing residential property Bridgend,



which is set within a residential curtilage. Access to the site is currently taken from Coote Lane at the site's south-eastern edge or via the existing property, Bridgend.

Previous Representations

The Site has been subject to previous representations in relation to the CLLP, in response to the Call for Sites 1 process in November 2018 and Issues and Options paper, which was published in November 2019. Further to that the site was also promoted again via a call for sites exercise and the Preferred Options consultation, which were submitted in February 2023.

With regard to the latter the Preferred Options iteration of the Plan saw the site retained as safeguarded land. It is assumed that this was because the housing requirements of the Borough at the time of the consultation were lower than now required and as such further allocations have been explored. This is a process that Northern Trust would encourage irrespective of the status of the housing supply across the three authorities.

The consideration of the site resulted in a conclusion that the development would have significant positive effects on social infrastructure and sustainable transport and that perceived significant negative impacts from flooding and biodiversity were 'uncertain'. Other impacts were thought to be mitigatable. As such it's clear that the site has always represented a viable option for development and Northern Trust welcome the proposal to formally allocate the site.

Proposed Site Allocation

The Site, ref. HS3.2 in the Publication Version, is allocated for housing and said to be able to accommodate 435 dwellings. As per the joint representation submitted by Homes England, which covers the entirety of the S3 safeguarded land, the allocation should be modified to 448.

Document 13 of the Regulation 19 documents provides the site profiles for allocations, with the Site details provided as Site Profile 18. The site is said to be suitable, available and achievable. All identified constraints are likely to be able to be mitigated. If allocated the site would form part of the Bamber Bridge Urban Area (Key Service Centre - Tier 2 of the settlement hierarchy) where there is "*a good range of services and facilities to their own populations and a wider surrounding catchment area,*" with an anticipated delivery date of 2029-2035 is provided. Again, we agree with these statements but would intend for delivery to begin earlier, with it envisaged 32 homes would be completed by September 2028.

A summary of constraints is provided in the site profile of which there 3 main topics raised: highways, flood risk and heritage/archaeology.

With regard to highways the document, as well as Appendix 4 for the LP, note Brook and Church Lane as having poor visibility and the need for site profiling to ensure safe access and internal use. The documents note adequate frontage is available on Chain House Lane and Coote Lane to form access points, with the latter serving the land controlled by Northern Trust. In this regard Northern Trust has already investigated the prospects of an access on this road and are content that a safe and suitable access point could be delivered. Consequently the matter is considered surmountable.



Flood risk is also noted as something which requires further investigation. Comments in relation to functional floodplain and Mill Brook are not applicable as they sit on other areas of the site, but the suggestion of updating flood modelling is noted and is something which is not considered to be an unsurmountable barrier to development. This is a shared opinion given the document notes that the site should be suitable for allocation.

Heritage and Archaeology are also noted, but reading the comments seemingly the requirements for further survey works are generated due to the size of the site, as opposed to any site specific concerns. Notwithstanding this, the requested works would form part of any future submission if allocated.

Other comments raised relate to generally standard technical requests which would be associated with development of this scale, such as a utilities, air quality and noise impacts. In this regard Northern Trust can confirm that all technical matters will be robustly and holistically addressed as part of any future submission should an allocation be forthcoming, as they hope.

In summary there are no technical limitations noted in the consultation documents which appear to represent a substantial or realistic concern. Hence there appears nothing which undermines the delivery or credibility of the allocation.

PWA Planning has made more general representations on the Regulation 19 Consultation on the Central Lancashire Local Plan 2023-2041 Publication Version. Whilst the purpose of this document is specific to site ref. HS3.2 at Apsley House, it is worth drawing out some of the key points of that more general response as they are relevant to the allocation of this Site:

PWA agrees with and broadly supports the vision for sustainable growth outlined in the Publication Version. However, the vision should explicitly reference the importance of significant housing growth to ensure economic sustainability and affordability. The plan must go further in addressing the region's housing shortfall, ensuring that policies actively promote housing delivery rather than restrict it.

Whilst the Publication Version acknowledges the need for housing, it does not go far enough in ensuring that housing supply meets demand. The proposed allocations cover only 80% of the identified housing requirement, which contradicts the Publication Version's overall ambition for sustainable growth. There is a reluctance to release Green Belt land or allocate additional sites beyond those already identified, limiting the scale of housing development.

The Publication Version promotes 'balanced growth' but this concept appears to be used in a way that constrains housing delivery rather than fully addressing demand. It prioritises development in existing urban areas but does not propose significant new allocations outside these locations.

Conclusions

The Site occupies a highly sustainable location with numerous services and facilities within an acceptable distance and a range of sustainable transport options in close proximity.



The Site is available and deliverable as a housing allocation. Given its current designation as safeguarded land, there was an acceptance during the previous plan period that the Site and the wider safeguarded allocation should be protected for future development needs. It is now clear that South Ribble needs to release this safeguarded land, together with other land, to meet future housing needs for the new plan period.

The Site has been subject to historic planning applications which have demonstrated there are no technical or environmental reasons which would preclude the Site coming forward for housing development. The Site would make a sensible housing allocation to meet future housing needs for South Ribble and wider Central Lancashire area, in line with the suggestion in the Publication Version documents.

Yours Faithfully

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