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Consultation Statement: Regulation 19 Pre-Submission Plan

GA Pet Food Partners Estates Ltd and Hulton Land

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1 INTRODUCTION

- 1.1 This Consultation Statement (CS) is written on behalf of GA Pet Food Partners Estates Ltd and Hulton Land (GA&HL) in response to the Regulation 19 Consultation on the emerging Central Lancashire Local Plan (eLP).
- 1.2 GA&HL have an interest in land off Whittingham Road, Longridge¹. The land can be split into front and rear parcels. The front parcel is set to form part of the urban area in the eLP, but the rear parcel is set to remain within an Area of Separation (AoS), as shown on the Policies Map.
- 1.3 It is considered that the Council is correct to remove the front parcel from the AoS, but that the AoS designation, in its entirety, is not justifiable and, as such, the eLP is not sound. Furthermore, it is considered that the site (front and rear) should be allocated for residential development with associated public open space (POS).
- 1.4 GA&HL and Edgeplan would welcome the opportunity to discuss this matter with the Policy Officers prior to submission of the eLP and intend to participate in the eLP Hearing sessions.

¹ Appendix 1: Location Plan

2 LAND OFF WHITTINGHAM ROAD, LONGRIDGE

The Site and its Setting

2.1 The site is some 9.3ha in extent and can be split into two parcels.

Front parcel

2.2 The front parcel is some 1.8ha in extent.



Image 1: Front Parcel

2.3 It includes a cleared site that benefits from planning permission. An application (no. 06/2019/0465) for outline permission for up to 9No. dwellings was approved on 23/12/2019. This was followed by the approval of Reserved Matters (no. 06/2021/1396) for 9No. dwellings on 08/03/2022. It is understood that pre-commencement conditions were discharged and a lawful commencement of development was made, keeping the permission alive. The front parcel is sandwiched between existing residential development to the east and west, with

further residential development and other uses, including an Aldi, on the opposite side of the road.

- 2.4 The remainder of the front parcel comprises of some undeveloped land, an access road, stables, hardstanding and associated horse paddock, as well as a reclamation yard. It too is well contained on all sides. A strong tree-lined boundary separates the site from industrial uses to the southeast. There is residential development to the north-east. Further residential development lies beyond Green Nook Lane to the west.

Rear parcel

- 2.5 The rear parcel comprises of greenfield land that is some 7.5ha in extent.



Image 2: Front and Rear Parcel

- 2.6 The fields are sporadically used for grazing and incorporate some trees and hedgerows along their boundaries. A tree belt runs along the eastern boundary, separating it from the industrial estate beyond but the large units and associated built development are prominent in views. To the west, Green Nook Lane and existing residential development creates a disconnect with the wider open countryside.

Locational Sustainability

- 2.7 The site is in a highly sustainable location. It is within easy walking and cycling distance of the services and facilities on offer in Longridge centre, which adjoins the site. For example, Aldi lies on the opposite side of Whittingham Road and Stonebridge Surgery less than 250m to the east. Extensive employment opportunities exist in Longridge and are within easy walking distance. There are also bus stops along Whittingham Road, including one opposite the site frontage, offering regular services to the wider area,.

Development Potential

- 2.8 The Urbanists have produced a Concept Plan² showing how the site could be developed for c. 120 - 140 dwellings (extract shown overleaf). The front parcel could accommodate c. 40 units and the rear parcel could accommodate a further 80 - 100 units.
- 2.9 Vehicular access could be achieved via Whittingham Road and/or Green Nook Lane, with pedestrian connections to both highways and the PROW network. Within the site, developable areas have been identified that allow for significant on-site public open space (POS) and landscaping. The existing vegetated buffer to the industrial units can be improved, screening views and softening the character of the area. New planting can also be delivered alongside Green Nook Lane creating an effective transition to the countryside to the west and boosting the effectiveness of the AoS.

Housing Mix

- 2.10 The housing mix is for discussion with the Council. HL is open to providing a mix that responds to the needs of Preston Council, such as some multi-generational and/or older people housing. The need for both forms of housing is confirmed in the eLP evidence base.

Summary

- 2.11 The site is partly previously developed land that is very well contained, more so than the proposed allocations to the west (HS4.13 and HS4.14). It is also highly sustainably located, again more so than the proposed allocations to the west. It can accommodate c. 120 - 140 dwellings as well as significant POS and landscaping, while having no discernible adverse impact on the AoS. Rather the structured landscaping would enhance the effectiveness of the AoS.
- 2.12 Both market and affordable housing could be delivered, as well as a mix of the form of housing that is needed in Preston and Central Lancashire. The site can deliver housing early in the plan period.

² Appendix 2: Concept Plan



Key	
01	Indicative access into the site capitalising on existing public transport infrastructure providing direct access to existing bus stops along Whittingham Rd.
02	Savick Brook is an existing water feature running North to South along the Eastern boundary of the site, contributing to the local ecology and wildlife habitat.
03	5m offsets from hedges / field boundaries to maximise the potential for existing hedgerows to continue to support local ecology and wildlife as well as establishing a landscape lead development scheme with strong existing and enhanced green infrastructure.
04	Sensitive edges to benefit from new tree and hedgerow buffer planting and proposed dwellings to side to protect the amenity of existing dwellings.
05	Enhanced landscaping along green corridors within the development with new tree and hedgerow planting, softening views toward the site reinforcing the separation between development parcel areas.
06	Majority of homes will have positive outlooks of green spaces supporting health and wellbeing, and provides natural surveillance over public open spaces and pedestrian links.
07	Primary street incorporate green verges to facilitate street trees and potential rain gardens to support the SuDS strategy and reinforce the street hierarchy.
08	Key nodal spaces punctuate the developable area with adding texture and interest to the hardscaping, traffic calming features may also introduced along the primary street.
09	Centrally located play provisions in close proximity to potential dwellings throughout the site.
10	Indicative trim trail, incorporating existing PROW which runs along by the western boundary, and pockets of outdoor exercise equipment.
11	Indicative pedestrian paths providing access to green space and wider PROW network.
12	Indicative pedestrian connections to the wider PROW network.
13	Existing PROW network.
14	Layout incorporates layered landscaping that captures ecological, social, and aesthetic benefits.
15	Indicative access into the site via Green Nook Ln.
16	Emergency access

Image 3: Concept Plan extract

3 REGULATION 19 PUBLICATION VERSION

Area of Separation

3.1 The rear part of the site is designated as an AoS on the Policies Map. However, it is considered that the evidence base does not justify this designation, in its entirety, and as such, the eLP is not sound.

3.2 It is acknowledged that neither the site nor development form being put forward by GA&HL have been previously considered by the Council. However, it is evident that the site makes an extremely limited contribution to the character and function of the AoS. This is confirmed in a Landscape and Visual Statement³ (LVS) prepared by Influence, which concludes as follows:

The proposals will deliver an approved permission, amended to form part of a cohesive development on the frontage to Whittingham Road, supported by additional residential development directly to the south within land perceived to be in the settlement boundary. Given the contained nature of these parcels of land and the surrounding modern housing on previously allocated land (Mosses Farm Road) and the 'robust' description of the Area of Separation in this location, this land does not fulfil the criteria for continued designation as AoS as its development will not undermine the physical extent and/or visual separation of settlements; and would not have an urbanising effect detrimental to the character of the open countryside, or the separate identity of the adjoining settlements.

Development of the southern parcels of the site will result in the loss of a very small portion of the countryside between Longridge, Goosnargh and Grimsargh. This is an extensive area of open countryside and there is not risk of coalescence or urbanising. Built development is proposed in the parcels of the site adjacent to existing built development, the area to the south retained as open landscape and improved through the opportunities arising from the concept masterplan.

Visually, there are limited sensitive receptors. Those on Whittingham Road already view, in planning terms, a developed site and the surrounding residential areas of Sapling Close and Mosses Farm Road are set in the context of settlement edge and built mixed development.

Residents and users of Green Nook Land and the wider PRowS are the most sensitive to changes on the southern parcels of the site. Robust vegetated buffers are shown to the properties on the lane and although the view will be altered from the PRow which crosses the site, as described, this PRow does not lead anywhere as a result of the Shay Industrial Estate being developed. Instead the whole section of southern fields will be opened up to public use providing a significant improvement in the recreational resource offered.

Users of the wider PRow network will experience a change to the countryside on the edge of the settlement, however due to the dominance visually of the industrial buildings and

³ Appendix 3: LVS

the new modern residential developments, they understand their proximal location to Longridge and the proposals will be experienced in this context.

Overall, it is considered that the development proposals will have very limited landscape and visual effects and will not be contrary to the emerging AoS policy. Overall, the proposals, in their entirety, will improve the landscape of the AoS through the delivery of new recreational links, enhanced and new biodiverse habitats, through securing the improved open space and in perpetuity through the long-term positive management of the landscape through a HMMP or similar approved.

- 3.3 It is also noted that the eLP seeks to allocate sites HS4.13 and HS4.14. Both are closer to Whittingham than the proposed site and would make a more valuable contribution to the AoS. It is therefore reasonable to conclude that if HS4.13 and HS4.14 can be allocated, so too can the GA&HL site.
- 3.4 It is suggested that the site represents a reasonable alternative that requires consideration by the Council prior to the submission of the eLP.

Older People Housing

- 3.5 As stated in Section 2 of this CS, GA&HL is willing to deliver a mix of housing that is needed in Preston, including some housing for older people.
- 3.6 Para. 63 of the NPPF states that “*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in in planning policies*”. The eLP evidence base identifies a need for housing for older people in Central Lancashire yet the eLP is largely silent on reflecting this need through its proposed development.
- 3.7 It appears as though one site is being identified as simply being suitable for older people housing (HS4.14, Longridge) with Preston West and North West Preston Strategic Allocation policies stating that they will deliver some older people housing though no figure appears to have been set out. It then appears as though the eLP seeks to rely on all dwellings being built to M4(2) standard with 4-5% of affordable dwellings being built to M4(3) standard. This gives no certainty whatsoever that these dwellings will be occupied by older people. Indeed, they could all be occupied by young families.
- 3.8 The failure to plan for older people housing when the evidence base identifies a need demonstrates that the plan is not positively prepared, justified or consistent with national policy.

4 CONCLUSIONS

- 4.1 It is considered that the Council is correct to remove the front parcel of the GA&HL site from the AoS, but that the AoS designation, in its entirety, is not justifiable and, as such, the eLP is not sound.
- 4.2 Furthermore, it is considered that the site (front and rear) should be allocated for residential development with associated public open space (POS). It is extremely well contained and is in a highly sustainable location. it presents the Council with a logical allocation.

Appendices 1 – 3 submitted as separate pdf documents