

edgeplan

7 Charlotte Street
Manchester
M1 4DZ
0161 228 2226
info@edgeplan.co.uk
www.edgeplan.co.uk

Consultation Statement: Regulation 19 Pre-Submission Plan

Reaper Limited and Hulton Land Ltd

April 2025

1 INTRODUCTION

- 1.1 This Consultation Statement (CS) is written on behalf of Reaper Limited and Hulton Land (R&HL) in response to the Regulation 19 Consultation on the emerging Central Lancashire Local Plan (eLP).
- 1.2 R&HL has an interest in land off Brindle Road, Bamber Bridge¹, which is identified as Site 19S062 in the Strategic Housing and Employment Land Availability Assessment (SHELAA) and is designated as Green Infrastructure (GI) on the Policies Map. It is considered that the GI designation is not justifiable and as such the eLP is not sound. Furthermore, it is considered that the site should be allocated for residential development and can provide significant, multi-functional and usable GI.
- 1.3 R&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 BRINDLE ROAD, BAMBER BRIDGE

The Site and its Setting

- 2.1 The site is some 4.5ha in extent and is predominantly greenfield land with an element of previously developed land adjoining Brindle Road, where vehicular access is achieved. It is sporadically used for grazing purposes and does not perform part of a wider agricultural holding.



Image 1: Location Plan

- 2.2 The site is very well contained on all sides, which is a reflection of its location with the urban area of Bamber Bridge:
- To the north-west and south-west, the triangular shaped site is bound by existing residential development.
 - The M6 forms the north-eastern boundary.
 - The southeastern corner of the site is bound by a privately run children's centre.
- 2.3 As a result of its urban setting, the site is also locationally sustainable. It is within close proximity to all services and facilities on offer in Bamber Bridge, including:
- Bamber Bridge St Aidan's Church of England Primary School;
 - Coppice School;
 - Walton-le-Dale High School;
 - Bamber Bridge Leisure Centre; and,
 - Withy Grove Park.
- 2.4 The site is also well served by public transport, with bus stops located along Brindle Road, including directly opposite the site, offering regular services to the wider area.

South Ribble Local Plan

- 2.5 The site is currently designated as GI in the South Ribble Local Plan (SRLP). However, it appears as though the SRLP designation was simply carried forward from the previous development plan document as it is not clear from the SRLP evidence base why it is designated as GI. It is assumed that the site was not promoted for development during the SRLP process and as such, the previous GI designation was simply carried forward. It may also be the case that the Council mistakenly considered that it formed part of the GI at the neighbouring children's centre. R&HL and Edgeplan would welcome the opportunity to discuss this with the Policy team at South Ribble Borough Council (SRBC).
- 2.6 The site is not Green Infrastructure. It is in private ownership with no public access. There are no Public Rights of Way (PRoW) running through or adjacent to the site which, as stated, is very well contained on all sides meaning it is barely visible from the public domain. At best, there is an appreciation that there is no development to the rear of the properties along Brindle Road and tree canopies are partly visible, but it provides no beneficial amenity in this regard and cannot objectively be considered as GI.
- 2.7 The site does not fall under any of the GI typologies listed in the SRLP:
- A. Parks and Gardens
 - B. Nature Reserves
 - C. Playgrounds
 - D. Recreation grounds
 - E. Playing fields/sports pitches/educational playing fields
 - F. Private and institutional open spaces
 - G. Amenity open spaces
 - H. Allotments
 - I. Woodlands

- J. Green Corridors/Green Wedges
- K. Natural and semi-natural greenspaces
- L. Wildlife corridors

2.8 It is immediately evident A – F and H – L do not apply to the site. Furthermore, upon visiting the site, it is evident that G does not apply. It is a field in a large built-up area, but the level of containment and lack of public views means that it cannot reasonably be claimed to be necessary to enhance the appearance of the area. Rather, it is a site that would present the Council with an opportunity for entirely logical infilling between built development.

Development potential

2.9 This CS is also supported by a Vision Document², prepared by The Urbanists. It sets out how the site could deliver c. 100 dwellings in a sustainable manner. The mix of dwellings could respond to the identified need in the area, including some much-needed housing for older people.

The overarching proposal transforms the site from an isolated and utilitarian greenfield space which is not accessible to the public, into a dynamic component of a comprehensive green infrastructure (GI) network, which will deliver tangible benefits to local residents and the wider community. Currently, the site lacks the connectivity and multifunctionality characteristic of a true GI network. Through the integration of green corridors, public open spaces, and sustainable drainage systems (SuDS), the proposals elevate the site into an essential link within the local GI framework. By retaining and enhancing existing natural features, such as hedgerows and mature trees, and introducing new elements like tree-lined streets, biodiversity-focused landscaping, new informal and formal play, and active travel routes, the scheme fosters ecological connectivity while enhancing recreational opportunities.

The site will contribute towards the GI network by providing a seamless connection to the broader landscape, linking the site to adjacent public footpaths, schools, and leisure facilities, thus encouraging sustainable travel and promoting healthier lifestyles. The creation of multifunctional spaces ensures that the GI network is not only a visual and ecological asset but also a resource for local wellbeing. With its focus on habitat creation, biodiversity enhancement, and climate resilience, the development sets a benchmark for how green infrastructure can transform a site into a community-centered, environmentally sustainable asset, providing long-term benefits for people and nature.



² Appendix 2: Vision Document



Image 2: Concept Plan

2.10 The Vision Document has been informed by various Technical Reports, all of which can be made available to SRBC upon request.

Transport Assessment

- 2.11 SK Transport have prepared a TA which demonstrates that the residential development of the site can be achieved without a severe impact on the highway network. Furthermore, it demonstrates that the site is locationally sustainable.

Arboricultural Assessment

- 2.12 The AA demonstrates that trees of value can be retained as part of the development of the site.

Ecological Assessment

- 2.13 Nearby ponds have been assessed and it has been confirmed that they do not provide habitats for great crested newts. No ecological constraints of note have been identified and there are no concerns regarding the ability to achieve a biodiversity net gain.

Phase 1 Ground Report

- 2.14 This has demonstrated that there are no constraints.

Flood and Drainage Assessment

- 2.15 Betts Associates have undertaken an initial assessment of flood risk and drainage for the site, including modelling surface water. This has shown that the area at risk from surface water flooding can be mitigated. There are no concerns regarding surface water or foul drainage.

Landscape and Visual Statement

- 2.16 Influence have prepared a Landscape and Visual Statement (LVS). The site and surrounding area have been visited by the landscape consultants, who have concluded that the site is very well contained visually. Residential receptors on Brindle Road have views from their back gardens and habitable rooms to the rear, but views from the properties to the north will be restricted by intervening trees, there are no long views of the site available, no designated or noteworthy views and none from PRowWs.

Summary

- 2.17 The site is visually contained and is not GI at present. It is a very logical residential development site. It can come forward for development early in the plan period and would deliver numerous benefits. Notably, it would deliver a true GI network connecting Cottage Lane to the north to Withy Grove Park to the south, while introducing significant on-site, multi-functional and usable POS of varying typologies.

3 REGULATION 19 PUBLICATION VERSION

- 3.1 The site is designated as GI on the Policies Map. However, it is considered that the evidence base does not justify this designation and as such, the eLP is not sound.

Green Infrastructure designation

- 3.2 Policy EN5 of the eLP relates to GI and seeks to protect the identified GI network. The policy justification, at para. 7.23, sets out the GI typologies found in Central Lancashire.

A. Allotments and community gardens

- 3.3 The site is not an allotment or community garden.

B. Amenity greenspace

- 3.4 As stated in Section 2 of this CS, the site is not amenity greenspace. Furthermore, it does not appear as though the Open Space Assessment (OSA) has assessed the site as amenity greenspace, or indeed as any other form of GI.

C. Cemeteries and churchyards

- 3.5 The site is not a cemetery or churchyard.

D. Cycleways and footpaths

- 3.6 The site does not currently have any cyclepaths or footpaths running through it, though both can be provided via the proposed residential development, connecting the site to the wider accessibility network.

E. Green corridors

- 3.7 The site is not a green corridor, as defined in the eLP.

F. Green roofs and walls

- 3.8 There are no green roofs or walls.

G. Hedgerows

- 3.9 There are hedgerows within the site but they do not justify the designation of the entire site as GI. Not all fields with hedgerows are designated as GI.

H. Natural and semi-natural greenspaces

- 3.10 The site is not a natural/semi-natural greenspace, as defined in the eLP.

I. Parks and public gardens

- 3.11 The site is not a park or public garden.

J. Ponds and lakes

- 3.12 There is a pond within the site, but it does not justify the designation of the entire site as GI. Not all fields with ponds are designated as GI.

K. Priority habitats

- 3.13 Initial ecological work has demonstrated that there are no priority habitats within the site.

L. Trees and woodlands

3.14 There are trees within the site but those of most value can be retained and significant tree planting can be secured via the development of the site. Not all fields with trees are designated as GI.

M. Watercourses

3.15 There is a drainage ditch running through the site, but it does not justify the designation of the entire site as GI. Not all fields with watercourses/drainage ditches are designated as GI.

3.16 The existing hedgerows, trees, pond and drainage ditch combined do not justify the designation of the site as GI. Not all fields in Central Lancashire with all of these features have been designated as GI. There is nothing unique about this site which would warrant the approach adopted by the eLP.

Open Space Assessment 2020

3.17 The OSA does not appear to assess the site, which in itself demonstrates that the site is not GI.

3.18 It was considered that the OSA would have most likely assessed the site as amenity greenspace. Of course, as stated in this CS, it is contended that the site is not amenity greenspace. The amenity greenspace sites within the South Ribble Eastern (SRE) area were considered, because the OSA confirms that Withy Grove Park is within the SRE area, and there do not appear to be any that could be the land off Brindle Road.

3.19 It is noted that the OSA refers to a Standards Paper (SP) being produced which would set out “*a more detailed analysis ... identifying recommendations and standards for each local authority*” (OSA, para. 2.1). However, this does not appear to have been undertaken for SRBC³. Edgeplan contacted KKP, the authors of the OSA, to query this and are awaiting a response.

3.20 It should also be noted that the OSA confirms that the SRE area has:

- an under provision of parks and gardens against the Fields in trust (FiT) standard;
- an over provision of natural and semi natural greenspace against the FiT standard;
- an over provision of amenity greenspace against the FiT standard;
- one of the lowest provisions for children and young people in Central Lancashire (no FiT standard given in OSA);
- an under-provision of allotments against the National Society of Allotment and Leisure Gardners (SALG) standard;
- no green corridors and there is only one in South Ribble.

3.21 This all suggests that the SRE area does not require additional amenity greenspace but would benefit from the proposed development and its associated provision of significant, multi-functional and usable POS/GI.

³ It is noted that the evidence base includes a SP for Chorley Council only

SHELAA

- 3.22 The site is given reference 19S062 in the SHELAA. The Site Profile states that the justification for not selecting the site as an allocation was that it was “*considered to be an essential part of Green Infrastructure Network*”. However, there appears to be no evidence to justify this claim.

Older People Housing

- 3.23 As stated in Section 2 of this CS, R&HL is willing to deliver a mix of housing that is needed in South Ribble, including some housing for older people.
- 3.24 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.
- 3.25 It appears as though one site is being identified as simply being suitable for older people housing (HS4.14, Longridge) with the 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 can/will be occupied by older people. Indeed, they could all be occupied by young families.
- 3.26 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.

Summary

- 3.27 The land off Brindle Road is designated as GI but there appears to be no justification for this designation in the eLP evidence base.
- 3.28 It has been demonstrated that the site represents a logical infill opportunity for residential development, which can deliver significant on-site POS, a connected GI network and the type of housing that is needed. The site should be allocated for residential development in the eLP.

4 CONCLUSIONS

- 4.1 It is considered that the GI designation is not justifiable and as such the eLP is not sound. The site is simply not GI.
- 4.2 Furthermore, it is considered that the site should be allocated for residential development and can, in turn provide significant, multi-functional and usable GI as part of a wider GI network.

Appendix 1 and Appendix 2 sent as separate pdf documents