

# Land at Bushells Farm, Goosnargh, Preston

Proposed allocation for residential development

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

APRIL 2025



# REPORT CONTROL

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## **/1 INTRODUCTION**

- 1.1. PWA Planning has been commissioned to prepare representations in relation to a parcel of land located to the south of Mill Lane, Goosnargh. 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 it has been identified that there is a significant shortfall in the proposed allocations in the Draft Plan which currently only cover 80% of the identified housing need for the authorities. 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. This document intends to provide an overview of the site and further illustrate why the site should be taken forward and allocated for development within the Local Plan period.



## /2 THE SITE

### Introduction

- 2.1. The site is 8.7ha and is located south of Mill Lane in Goosnargh and comprises 6 rectilinear fields. The site has the potential to develop land to the south of Mill Lane, Goosnargh with up to 140no. residential dwellings, including the provision of the required percentage of affordable units and a new access points off Mill Lane and Church Lane, which offers a safe, convenient access route with good visibility splays.



*Figure 1 – Approximate Site Extent shown edged in red (Source: Google Earth)*

- 2.2. The site boundary development adjoins the existing Goosnargh settlement as can be seen in Figure 1 above. The former Whittingham Hospital site is located to the south of the site and is currently being developed by housing Wimpey. Directly to the east of the site planning permission has been granted for seven dwellings on a greenfield piece of land, these have now been constructed. This can be seen on Figure 1 indicated by the blue boundary.



### Planning History

2.3. A search of Preston City Council's planning register has been carried out to understand the site's planning history. The relevant applications are detailed in turn below.

2.4. The following applications relate to the site itself:

**06/2018/0884** Outline planning application for up to 140no. dwellings with all matters reserved except for access. Refused. Appeal, ref APP/N2345/W/20/3258912, Dismissed 3<sup>rd</sup> February 2022.

**06/2020/1141** Outline planning application for up to 140no. dwellings with all matters reserved except for access. Refused.

2.5. The site subject of these representations was refused planning permission in outline for 140 houses and an appeal, ref APP/N2345/W/20/3258912, dismissed in February 2022. The proposal was found to conflict with the spatial strategy outlined in the Central Lancashire Core Strategy (JCS Policy 1) and Preston Local Plan Policy EN1, both of which aim to restrict large-scale housing in rural villages like Goosnargh, except in exceptional cases. At the time of the decision, Preston could demonstrate more than a 5-year supply of housing land and the tilted balance was not engaged. The Council argued that the cumulative effect of this and other nearby proposals would overwhelm Goosnargh's character as a rural settlement. The Inspector found that while there would be change, it would not be of a scale or character to harm the village's form, setting, or historical associations. The development would have moderate landscape and visual impact but would not conflict with the Core Strategy landscape policies or result in unacceptable harm. There were no technical reasons that would prevent the sites development, this was agreed in the Statement of Common Ground which supported the appeal, with no technical matters raised as concern by the appeal inspector.

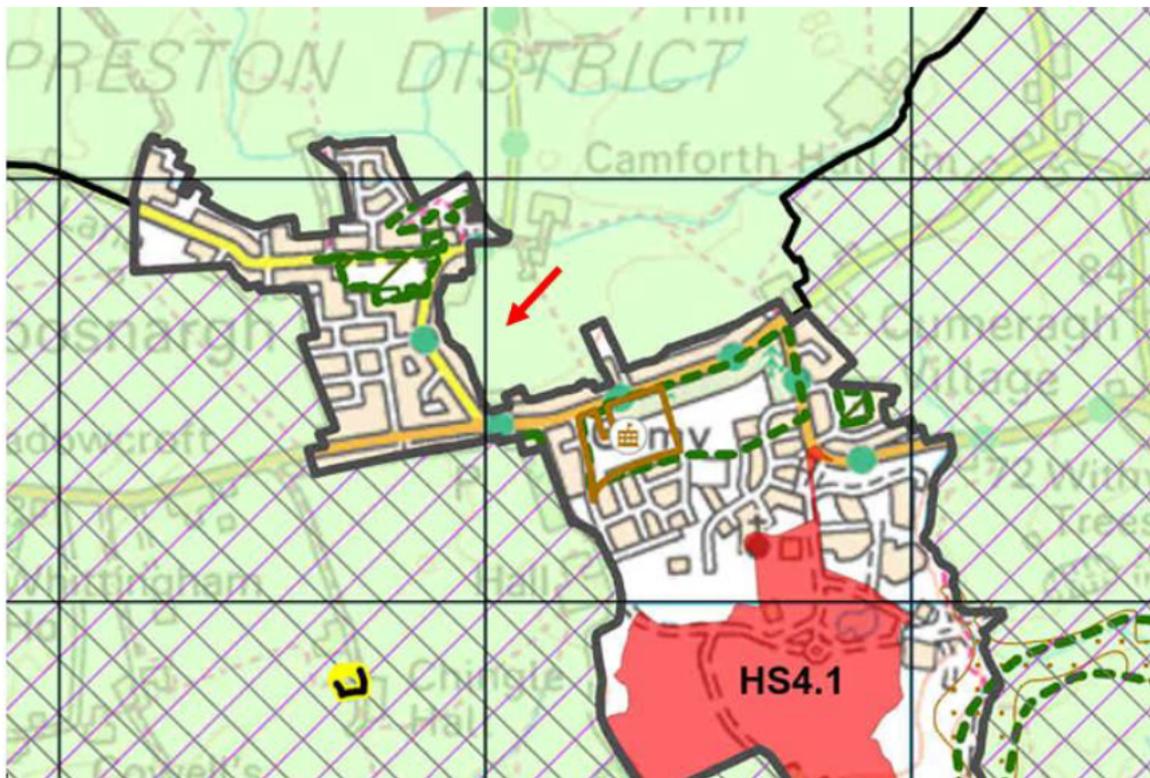




- 2.9. Access to the site is currently taken off Mill Lane, from the northern boundary of the site, from the north east corner of the site and from the PROW which runs along the eastern perimeter of the site.

#### Site Allocation in the Draft Plan

- 2.10. The site is allocated in the draft plan as Open Countryside as can be seen in Figure 3 below. Draft policy EN17 applies.



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

- 2.11. 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.
- 2.12. 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.

- 2.13. 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.
- 2.14. 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.
- 2.15. 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.
- 2.16. The Bushells Farm site is surrounded by built development on three sides and is clearly well-related to the existing urban form. Its development would constitute a logical and sustainable extension to the village, with good access to services, local schools, and public transport.
- 2.17. The site is sustainably located, lying adjacent to the existing built-up area of the village 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.
- 2.18. In physical terms, the site is well-contained by existing development and landscape features. The built form on three sides provides a strong sense of enclosure, 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.



- 2.19. Allocating the Bushells Farm site for housing would contribute to meeting identified shortfalls in a sustainable, plan-led manner, while preventing future speculative development elsewhere.
- 2.20. Retaining the countryside designation would hinder sustainable development and compromise the Plan's ability to meet housing needs in accordance with national planning policy. The site should therefore be de-allocated as open space 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.

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### **/3 CENTRAL LANCASHIRE DRAFT LOCAL PLAN**

- 3.1. As part of the consultation process, we have reviewed the Draft Plan and have provided representations under separate cover. In relation to the sites 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

- 3.2. PWA agrees with and broadly supports the vision for sustainable growth outlined in the Plan. However, the vision is not supported by the land use allocations which are contained within the Plan, [REDACTED] of quantum of development which will be delivered or the spatial location of the proposed allocations.
- 3.3. [REDACTED] The plan must go further in addressing the region's housing shortfall, ensuring that policies actively promote housing delivery rather than restrict it.
- 3.4. This is particularly relevant given that the authorities are seeking to take advantage of the transitional provisions provided at Annex 1 Paragraph 234(a) of the Framework and so do not propose to meet the full local housing needs and seeks examination of the plan against the requirements of the previous Framework. It is acknowledged that under these provisions, the housing requirement must be no less than 80% of local housing need. The plan indicates a housing requirement which meets these provisions. The plan needs to be able to demonstrate that it then makes sufficient land use allocations to ensure that these requirements are achieved. Indeed, when the housing requirement is below the actual need, it is even more crucial that the proposed land use allocations included in the draft plan have been fully assessed for deliverability. The loss of even a modest number of sites would mean that actual delivery would likely fall well below 80% of local housing need and thus further compound the lack of supply of new homes.
- 3.5. PWA is aware that some of the sites proposed for allocation are constrained by access and other technical / ownership issues which will likely prevent development. The degree of rigour of the allocation process, particularly in considering the technical constraints, appears to be limited. This suggests that the authorities will be unable to meet the required 80% detailed within the plan which brings clear questions as to its soundness. Planning for the



bare minimum is neither in the best interests of Central Lancashire, nor does it align with the NPPF which seeks to boost the supply of housing.

- 3.6. In our opinion additional land use allocations, particularly for new housing, are required to ensure the plan remains sound and can ensure delivery of at least 80% of the local housing need is achieved in housing within the Local Plan area.
- 3.7. The Plan supports economic growth and employment, particularly in relation to town centres, strategic employment sites, and investment in infrastructure. However, this is not always clearly linked to the need for corresponding housing growth. The economic projections published as part of the evidence base for the plan indicate a much higher level of housing should be planned for, particularly when you factor in the National Cyber Force HQ development. These alone indicate a greater level of housing should be planned for, besides for the questions on the deliverability of some of the sites the authorities are currently relying on within the plan period.

#### Strategic Objectives

- 3.8. Strategic Objective 3 'Sustainable Communities' should be reworded to ensure that the key focus is around ensuring that the policies of the plan help to deliver a sufficient supply of homes and to support the Government's objective of significantly boosting the supply of homes (NPPF 2024 Para 61). The objective should expressly indicate a desire to boost the supply of new homes, as a clearer indication of the Councils' intentions to support economic growth and ensure adequate homes are available to meet all needs.
- 3.9. 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.

#### Spatial Strategy



- 3.10. 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.
- 3.11. PWA feels the spatial strategy does not go far enough in supporting growth. Despite acknowledging the need for housing, the plan includes a housing requirement which is around 80% of the local housing need and hence then allocates land to meet this requirement. This approach limits opportunities for both economic expansion and housing affordability.
- 3.12. Not only does the Plan not align with the revised NPPF 2024, which the transitional provisions allow [redacted] to meet the objectives of significantly boosting the supply of housing delivery, which were enshrined in the earlier version of the Framework. Policy SS1 (Development Patterns) fails to allocate sufficient land to meet housing needs in full, instead relying on previously allocated sites with no substantial new allocations. The spatial strategy does not provide flexibility should existing allocations fail to deliver, increasing the risk of housing shortages.
- 3.13. To address these issues, PWA recommends increasing housing allocations to fully meet local needs and carrying out a full Green Belt review. These actions are essential given the clear shortfalls anticipated in the plans housing delivery.

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

- 3.1 Policy HS1 does not align with the requirement to significantly boost housing supply in NPPF. The policy acknowledges the need for new housing but only seeks to meet 80% of the identified housing requirement, which is wholly insufficient. NPPF 62 states that local plans should meet as much housing need as possible. By not planning to fully meet local housing needs, the policy exacerbates affordability issues and limits the economic potential of Central Lancashire. Furthermore, there is no flexibility built into the policy, if existing allocations underdeliver, there is no clear mechanism to release additional sites, creating a risk of persistent undersupply.
- 3.14. 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 the site at Bushells Farm for housing. Specifically the site should be listed within the allocations in Policy HS4.

### Summary

- 3.15. 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 in accordance with the NPPF. The proposed approach, allocating only 80% of the identified housing need, is likely to fall significantly in delivering the number of houses across the plan period.
- 3.16. 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.
- 3.17. 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.
- 3.18. The Bushells Farm site represents a logical and deliverable solution to help meet Preston's unmet housing need. Its allocation would support the objectives of the NPPF, 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 Bushells Farm site, to ensure the soundness of the Plan and deliver genuinely sustainable growth for the region.



## **/4 PROPOSED SITE ALLOCATION**

- 4.1. As demonstrated by the preceding text, the site has the potential to deliver in the region of 140 new homes. No environmental or technical issues have been identified (which was confirmed in the recent appeal) which would preclude residential use. In short, the site is suitable, available and deliverable, and would comprise an appropriate housing allocation.
- 4.2. The previous appeal decision identified a substantial number of positive attributes which provide a strong basis for reconsidering the site's status particularly in light of Central Lancashire's housing delivery challenges and the preparation of a new Local Plan.
- 4.3. While the appeal was dismissed, the Inspector made numerous important findings in favour of the site's suitability and sustainability for residential development. The Inspector found that the proposed development, even in conjunction with nearby sites, would not cause an unacceptable impact on the character, setting, or historical identity of Goosnargh. The village would continue to read as a predominantly linear settlement, and there was no identified harm to the heritage significance of surrounding listed buildings or non-designated heritage assets. The proposal was judged to have only a moderate landscape impact and would not result in significant visual harm. Views into the site were limited and filtered, and the Inspector concluded that the proposal complied with relevant landscape policies.
- 4.4. The Inspector confirmed that Goosnargh offers a range of day-to-day services and facilities including a primary school, two convenience stores, public houses, a pharmacy, and a post office and that these are all within walking distance. Public transport links to Preston and Longridge were acknowledged as adequate, with S106 contributions proposed to enhance bus services. The site was therefore described as sustainable, albeit in a lower-tier location.
- 4.5. The appeal concluded that the development would not give rise to issues in relation to highways safety, drainage, flood risk, ecology, or infrastructure capacity. Statutory consultees including United Utilities, the Lead Local Flood Authority, and the Highway Authority raised no objections subject to appropriate conditions.
- 4.6. The scheme was promoted by a not-for-profit housing provider, with 45% affordable housing proposed. This contribution was recognised as significant, particularly in the context



of unmet affordable housing needs across Preston, and the site was considered deliverable without delay. This is still the case in the present day.

- 4.7. These conclusions collectively demonstrate that the development of the site is appropriate in principle, well-located, and capable of being delivered without adverse effects, strongly supporting its allocation in the Local Plan.
- 4.8. Bringing this site forward for housing allocation would result in a number of beneficial planning outcomes. Firstly, it would support the sustainable growth of Goosnargh by ensuring that the village continues to thrive and maintain the critical mass necessary to support local services and infrastructure. Small and medium-sized 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.
- 4.9. 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,.
- 4.10. Finally, reallocating this site from Open Countryside 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.



## /5 CONCLUSIONS

- 5.1. As demonstrated in the supporting assessment work for this document, the site has the potential to deliver approximately 140 new homes to contribute to the housing supply for Preston, with no environmental or technical issues identified which would preclude residential use.
- 5.2. The appeal decision for Bushells Farm affirms that the site is suitable, sustainable, and deliverable for residential development. While dismissed due to technical conflict with current policies, the Inspector identified no site-specific harms that would preclude development. 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.
- 5.3. 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** - Bushells Farm 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).
  - **Sustainable Village Growth** - Development at Bushells Farm would support local services and facilities, helping to maintain their viability, which aligns with rural sustainability goals.
  - **Logical Extension of Goosnargh** – The site lies immediately adjacent to the existing built-up area of Goosnargh, 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 appeal decision confirmed that there would not be harm to heritage assets, not result in significant landscape or visual harm, no biodiversity loss, would not harm highways safety, drainage, or flood risk.



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

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