

**SITE NAME:** Land at Helms Farm, Broughton

**LPA:** Preston City Council

**Date:** April 2025

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## Introduction

Story Homes controls land at Helms Farm, Broughton. This site has been promoted by Story Homes at all stages of the Central Lancashire Local Plan but has not previously been selected for development. As such, it is an omission site.

Story Homes is aware that the Local Plan Inspector will only consider the development contribution from omission sites should there be conclusions that there is a lack of land supply overall. This is exactly the case in respect of the Regulation 19 Local Plan – there is insufficient land identified to meet needs.

As part of its submissions, Story Homes has prepared several documents which should be read in parallel to this individual site representation. For ease of reference, these comprise:

1. Central Lancashire Housing Need – Prepared by Stantec on behalf of a consortium of developers.
2. Housing Land Supply Assessment – Prepared by Stantec on behalf of a consortium of developers.
3. Core representations to the Central Lancashire Local Plan Regulation 19 – Prepared by Stantec on behalf of Story Homes.
4. Viability representations prepared by Roger Hannah.
5. Individual Site Submission (this document).
6. Accompanying Development Framework and site assessment.

Across these documents, Story Homes sets out its **objections** to the Central Lancashire Local Plan Regulation 19. We do not repeat all those arguments here, but it is clear that insufficient land is proposed to be allocated in the Central Lancashire Local Plan and housing needs will not be met. Furthermore, conclusions are drawn regarding the deliverability of many sites selected for allocation by the Authorities, particularly regarding the certainty of supply in Preston, where delivery and viability are significant issues.

Objections are raised in respect of the site selection methodology and process undertaken in selecting allocations. This appears to be very much based upon sites chosen based on their aggregate yield (to achieve a *minimum* housing supply to 'get through' a Local Plan examination, rather than a thorough assessment of what can realistically be delivered.

Accordingly, Story Homes considers that the Councils should allocate further land for development. Land at Helms Farm, Broughton is an obvious candidate site.

## Site Description

The accompanying Development Framework identifies the site in relation to the built-up area of Broughton. Helms Farm is part brownfield and part greenfield.

The Site is located immediately to the north of the built-up area of Broughton, which is a Tier 4 settlement. Broughton has major employment provision, and outstanding services that are commensurate with a Tier 3 settlement. Services include excellent access to public transport, primary and secondary schools, shops, hotels and leisure. It has an excellent range of sports and community facilities.

Land at Helms Farm therefore performs exceptionally well in terms of its sustainability credentials and Story Homes has promoted the site for both housing and specialist housing, a specific sector not catered for anywhere else via allocations. It is approximately 300m from the centre of Broughton, making it within easy walking distance of the majority of local services.

The Site is 10.79 hectares, with approximately 20-25% of the site area brownfield.

## Assessment against evidence base - SHELAA

The updated SHELAA January 2025 (HO15) discounts the site as below:

### Extract from SHELAA

19P071	Land at Helms Farm	Broughton	Preston Rural East	Housing	Site does not accord with Spatial Strategy - site within AoS and OC
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This final column in the SHELAA states that it is not in accordance with the Spatial Strategy, within the Open Countryside (OC) and within an Area of Separation. We address these matters under the headings below. Story Homes considers that the Council has failed to undertake a robust site selection process and the findings in relation to land at Helms Farm are inconsistent with the approach taken elsewhere. The Council has simply chosen the sites it prefers, rather than follow a robust and transparent selection process. The process is not justified nor is it positively prepared and is fundamentally unsound.

### Spatial Strategy

Policy SS2 allows for limited development at Tier 4 settlements appropriate to the settlement size. In the case of Broughton, the settlement has an outstanding range of local services, employment and school provision. It is a settlement of considerable size and well related to the highest order settlement of Preston.

The Local Plan allocates land in Tier 4 settlements elsewhere and where such sites have been selected the SHELAA makes clear that Tier 4 settlements will be required to accommodate some growth. It is therefore inconsistent to discount land at Helms Farm as being contrary to the Spatial Strategy.

### Open Countryside

The site is part brownfield and part greenfield as noted above. The Council appears to have ignored this fact and discounted the site entirely as wholly lying within the Open Countryside.

Notwithstanding this point, the Council is allocating Open Countryside land elsewhere in the Plan. It is inconsistent to discount land at Helms Farm from further assessment when allocating equivalent sites

elsewhere. No weight appears to have been given to the benefits of bringing forward brownfield development within the SHELAA assessment notwithstanding that the Council's housing topic paper seeks to make the case that brownfield development has been prioritised.

### **Area of Separation**

The Council has also discounted the site as one that lies within an Area of Separation. This is incorrect. The Site does not fall within the adopted Local Plan Area of Separation, which is to the south of Broughton and separates the settlement from Preston. The Site is to the north of Broughton and therefore has no impact on the gap between Broughton and Preston.

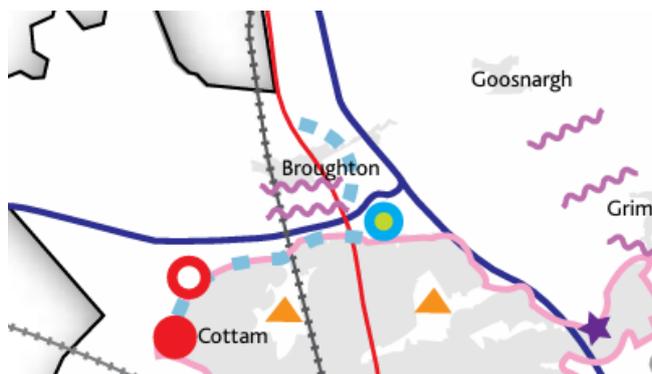
The Council is proposing a new Area of Separation all around Broughton. This is not justified and is not based on any evidence. We address this in the section below but note that the Council has simply invented a new Policy approach and is using this to discount land at Helms Farm. The Plan is unsound on this basis.

In summary, the SHELAA has discounted land at Helms Farm in a manner which is arbitrary and inconsistent with its own approach elsewhere.

### **Areas of Separation**

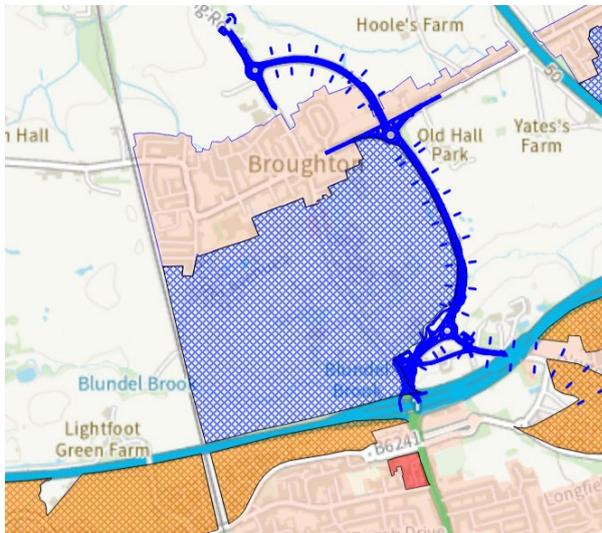
The adopted Central Lancashire Core Strategy (2012) provides the basis of Areas of Separation at Policy 19. The rationale and supporting text around Policy 19 are light, and the explanation refers to protecting the areas *at greatest risk of merging*. Policy 19 does not set specific boundaries for the Areas of Separation, but the Key Diagram identifies it is the land south of Broughton and North of the Preston built up area (see purple zig zag lines below).

#### **Extract from Core Strategy Key Diagram**



The Preston Local Plan (adopted 2015) does provide a detailed boundary of the Areas of Separation at Policy EN4, which identifies land south of Broughton and the Preston Urban Area as the Area of Separation. This is depicted in the Council's online mapping via the blue hatched area as shown on the extract below.

**Extract from adopted Preston Local Plan (2015) – online Policies mapping.**



The Regulation 19 Local Plan includes a new Policy for Areas of Separation (Policy EN18), extract below. Criterion one refers to maintaining Areas of Separation to protect areas at risk of coalescence. This narrative is continued at paragraphs 7.117-7.120 of the supporting text, which refers to the need to continue the gaps between some settlements, including Broughton and the edge of the Preston Built up area.

**Extracts from the regulation 19 Local Plan: Areas of Separation**

**Policy EN18: Areas of Separation**

1. Areas of Separation will be maintained to protect areas where there is a risk of coalescence.
2. Development proposed within the defined Areas of Separation as shown on the policies map will be permitted provided that it accords with the spatial strategy for growth set out in Policy SS1 Development Patterns, and:
  - a) it would not undermine the physical extent and/or visual separation of settlements; and
  - b) it would not have an urbanising effect detrimental to:
    - i. the character of the open countryside; or
    - ii. the separate identity of the adjoining settlements

7.117 A landscape assessment has been provided on behalf of the Central Lancashire Councils to assess and set out the importance and role of continuing to maintain gaps, identified as Areas of Separation, between the settlements and the main urban area of Preston. The study identifies that the open countryside areas across Central Lancashire perform an important role in separating and providing a setting for the area's rural settlements. Maintaining the individual identities of our communities is an important priority for the Local Plan. To support this, the extent, amount and location of our Areas of Separation have been reviewed and revised, taking into consideration recent developments and planning commitments within these areas, where significant development has taken place outside of the settlement boundary.

7.118 The local plan seeks to manage development within these areas in order to keep them physically separate from each other. Development over recent years on the periphery of the urban area has impacted some settlements and put areas at risk of merging, particularly those settlements of Broughton and Grimsargh closer to the edge of the urban area.

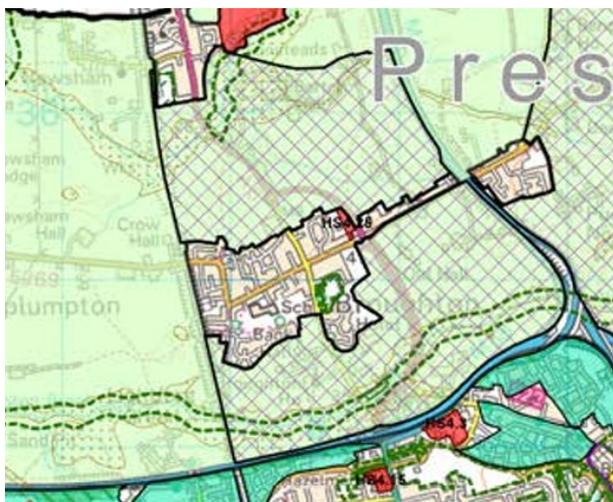
7.119 The Council considers that designating areas between settlements as settlement gaps to be kept free of urbanising development is the best way of preventing further loss of local identity. Following a review of the boundaries of settlement gaps and consideration of the extent of land required to prevent coalescence of settlements, the Council has defined a number of such gaps as shown on the policies map.

7.120 Any new development within a settlement gap should not physically and/or visually undermine the gap between settlements. Any new development including the intensification or redevelopment of existing activities within gaps should seek opportunities to enhance the function of the gap. Consideration will be given to how the proposed siting, design, colours, materials and any storage of materials, lighting, boundary treatment, landscape features, landscape improvements and/or appropriate long term management arrangements serves to ensure the proposed development meets the criteria in policy EN2 Design Criteria for New Development and supports the growth strategy as set out under SSI Development Patterns.

Noting the above context, Story Homes objects to the Council's approach to Areas of Separation. The basis of the policy, established over many years, has been to protect south of Broughton from merging with the Preston built up area. The Council has now changed its approach and without justification, it has extended the Areas of Separation all around Broughton. We refer to the regulation 19 Policies maps extract below.

There is no evidence to support the extension of the Areas of Separation around Broughton. It is not justified and is unsound.

**Extract: Regulation 19 Policies Maps of Broughton**



## **Summary**

Story Homes has raised concerns about the blanket approach the Council has used to discount sites as part of the site selection process. In the case of Helms Farm, Broughton, the Council has incorrectly dismissed a part brownfield site, as lying entirely in the open countryside and within a top tier settlement. The Council also dismissed the site from further assessment on the basis that it falls within a new Area of Separation that it is now proposing. The Councils' approach is therefore plainly flawed.

The proposed approach to extending Areas of Separation is not justified. The long-established position in Central Lancashire is to protect areas south of Broughton and on the edge of the Preston Urban Area. There is no evidence to support the assertion that development to the North of Broughton could adversely impact on the separation gap.

Story Homes has made submissions regarding the delivery of sites in Preston, their viability and developable potential. Evidence has been provided to demonstrate that not enough land is allocated overall, and the approach to Broughton is doubly flawed by the introduction of artificial constraints to development.

## **Supporting Documents**

- Development Framework document prepared by Stantec.