

SITE NAME: Liverpool Road, Longton

LPA: South Ribble Council

Date: April 2025

Introduction

Story Homes controls land at Liverpool Road, Longton. 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.

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 comprises:

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. Individual Site Submission (this document)
5. 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 those arguments here, but it is plainly 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.

Story Homes also raises objections to the Green Belt review, for various reasons set out in this and other submissions. In short, by focusing on vary large parcels in the Green Belt review, the author has assessed land with very different functional characteristics than the smaller parcel candidate sites actually being proposed by developers. In doing so, it has arrived at illogical conclusions regarding the contribution various parcels make to the Green Belt.

Accordingly, Story Homes considers that it is evident the Local Plan requires further land to be allocated for development. Land at Liverpool Road, Longton is an obvious candidate site.

Site Description

The site lies to the west of Liverpool Road in Longton, which is a top tier sustainable settlement for growth, offering a good range of local shops, services and public transport opportunities all within a close walking and cycling distance. It is contained by development on all sides and the proposed development of the Site would round off the existing settlement in this location. The Site is currently greenfield and in agricultural use and lies within the Green Belt.

Access to the Site is provided from Liverpool Road and there is the opportunity to create a secondary access and or pedestrian link to Formby Crescent, where there is an existing gap between dwellings.

The accompanying Development Framework provides Story Homes design proposals and sets out how, through an imaginatively designed scheme, the Site can provide for a high-quality development of up to 200 homes.

Assessment against evidence base

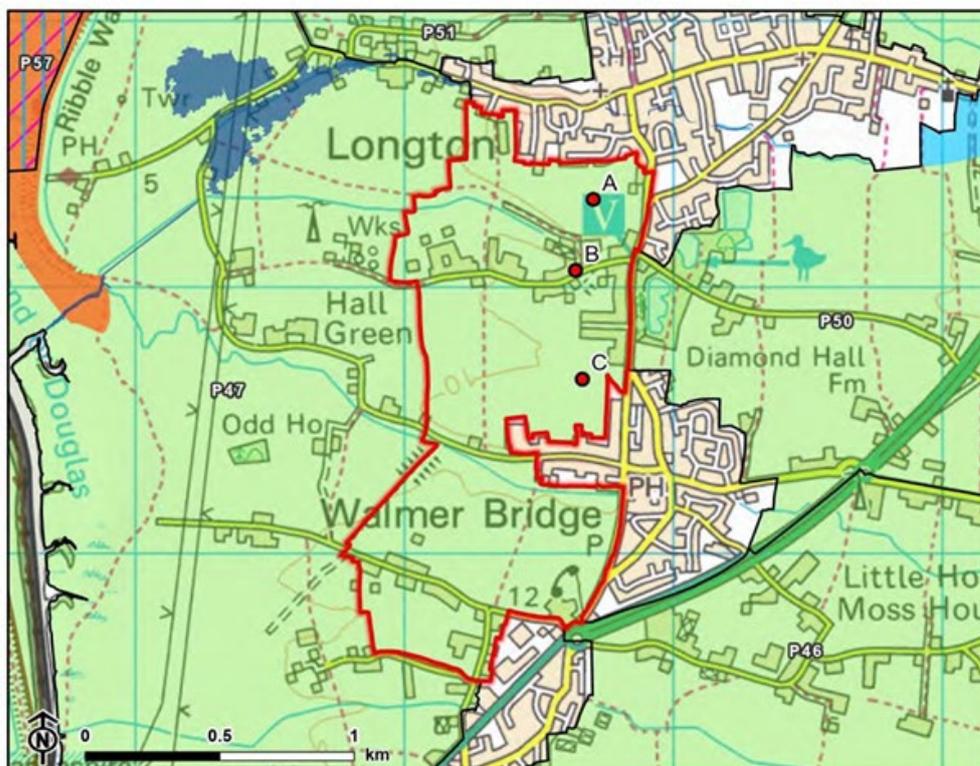
It is Story Homes case that the Central Lancashire Local Plan does not identify sufficient land for development, and, that exceptional circumstance exists to warrant a review of the Green Belt in Central Lancashire (NPPF 145 and 146 apply). The Regulation 19 document does not provide sufficient land and is unsound on this basis. To rectify the lack of overall supply, the Council needs to release further Green Belt land for development.

The evidence base for the Council's Green Belt review is contained in document EV7, "Open Land Designation Study" (2022) prepared by LUC. One of the criticisms that Story Homes has of that evidence-based report is that the parcel areas selected by the author are so large that it is almost impossible to arrive at any meaningful conclusions regarding individual parcel contributions towards the Green Belt. By selecting such vast areas in the first place, the findings of the consultant team provide very little assistance to the Council as part of the site selection process.

Land at Liverpool Road Longton lies within assessment Parcel P60, extracted below. The P60 area is larger than the entire combined settlement areas of both Longton, Walmer Bridge and Hutton combined, but has been assessed as one area. Therefore, the consultant arrives as an inevitable conclusion that that there is a moderate contribution to Green Belt purposes as it has assessed a huge area.

The extremely broad approach undertaken, cannot therefore assist the Council's site selection process.

Parcel P60



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P60	Policy G4: Protected open land
Neighbouring parcel	Absolute Constraint(s)
Central Lancashire boundary	National nature reserve
Neighbouring Local Authority	Special Protection Area
Green Belt	Sites of Special Scientific Interest
Location referenced in assessment text	Open access land (CRoW Act)
	Flood zone 3b

Furthermore, the author appears to recognise the flaws in its own methodology, by including specific qualification text that is intended to provide a further layer of detail that cannot be achieved when looking at the parcel as a whole.

As per the above extract, P60 includes three red dots where the author has sought to add additional comments. Point A) is almost central in the Story Homes controlled land at Liverpool Road.

The LUC Green Belt Assessment text states in specific reference to that point:

“For the area to the southwest of Longton, to the south of Formby Crescent and to the west of Liverpool Road (map point A), tree cover to the south and west provides an alternative Green Belt boundary, and land to the south beyond the trees is already subject to urbanising influence from washed-over development along Hall Lane”.

Given this finding, it is wrong to conclude that that the site fulfils a Moderate purpose to inclusion within the Green Belt. It is self-evident that the author does not consider that that parcel of land at point A), which is only around a fifteenth of the overall Green Belt parcel P60 as assessed, fulfils any Green Belt function and that it is entirely contained.

Story Homes - Green Belt Assessment

As part of its Local Plan submissions, Story Homes has provided a Development Framework document which included the company’s own assessment of the Green Belt as below. **It is Story Homes case that land at Liverpool Road in Longton provides no, or very limited contribution to the purposes of the Green Belt and should be released for development.**

Purpose of the Green Belt	Assessment
1. Check the unrestricted sprawl of large built-up areas	The scale of Longton is not an area at risk from urban sprawl or coalescence. The parcel itself is well contained by existing development and other strong defensible boundaries including existing hedgerows. Development would not lead to unrestricted urban sprawl. Longton is not a large built up area and development of the Site will not lead to any coalescence with neighbouring settlements.
2. Prevent neighbouring towns from merging	The parcel itself does not present the erosion of a physical gap between neighbouring settlements or neighbouring towns. The Site is not located within an Area of Separation or Green Gap.
3. Assist in safeguarding the countryside from encroachment	The Site is greenfield and devoid of any significant landscape features except for some trees along the boundary which confine the Site. It would be a logical extension of the existing housing estate to the north.
4. Preserve the setting and special character of historic towns	Longton is not a historic town and this criteria is not relevant.
5. Assist in urban regeneration, by encouraging the recycling of urban / derelict land	Longton has very few vacant brownfield sites and is not a regeneration priority area. Development of the Site would not frustrate other regeneration aspirations of the Council.

Table 1 : Green Belt Assessment

Safeguarding land

Separately and when defining Green Belt boundaries, the NPPF requires Authorities to identify areas of safeguarded land to meet the longer-term needs stretching beyond the plan period. Criteria c) and d) apply as below.

148. When defining Green Belt boundaries, plans should:
- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
 - b) not include land which it is unnecessary to keep permanently open;
 - c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
 - e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
 - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

In the case of Central Lancashire, the need for safeguarded land was discussed briefly at the Preferred Options stage. In that document, at page 33, the Authorities recognise the role that safeguarded land has played in identifying land beyond 2015, particular in South Ribble and Chorley.

In the case of South Ribble, the report states that safeguarded land has not been required to come forward and is therefore not needed in the new Local Plan. However, this is qualified by concerns raised in the progress of Pickering's Farm, and the need to consider the role safeguarded land can play in considering the strategic growth of Curden / Salmesbury.

In the case of Chorley, the Preferred Options document states that the majority of these allocations have been granted planning permission upon appeal and are therefore included in the housing supply, with other remaining safeguarded sites either discounted due to constraints or proposed for allocation.

Noting the above findings, the Council clearly accepts that safeguarded land has provided a useful policy mechanism to help deliver homes beyond the original plan period. It is counter intuitive to therefore not consider the role of safeguarded land further in this Regulation 19 document.

Furthermore, as the Regulation 19 Local Plan is based on achieving only 80% of the standard housing methodology, it is self-evident that land needs to be safeguarded to meet future needs. The inconsistency is the Council's approach to Green Belt at this stage is misleading to the public and not justified.

Summary

Story Homes controls land at Liverpool Road, Longton which it is promoting for development. Story Homes' own conclusions on the site align with the Council's evidence base in that the Site provides a very limited / no contribution to the purposes of including land within the Green Belt. It should therefore be allocated for development.

Should the Inspector find that there is sufficient land in the plan period to achieve the 80% of housing needs being advanced as part of this strategy, then the site should at least be identified as safeguarded land under the provisions of the NPPF.

Supporting Documents

- Development Framework document prepared by Stantec.