

SITE NAME: Land at Longridge Road, Red Scar, Preston

LPA: Preston City Council

Date: April 2025

Introduction

Story Homes controls land at Longridge Road, Red Scar. 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 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. 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 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.

Site Description

The accompanying Development Framework identifies the site in relation to the built-up area. The site is sandwiched between development along the length of Longridge Road and the existing Roman Way Industrial Estate and employment allocations from the adopted Local Plan. For ease of reference we have extracted the red line plan as below.

Site location plan



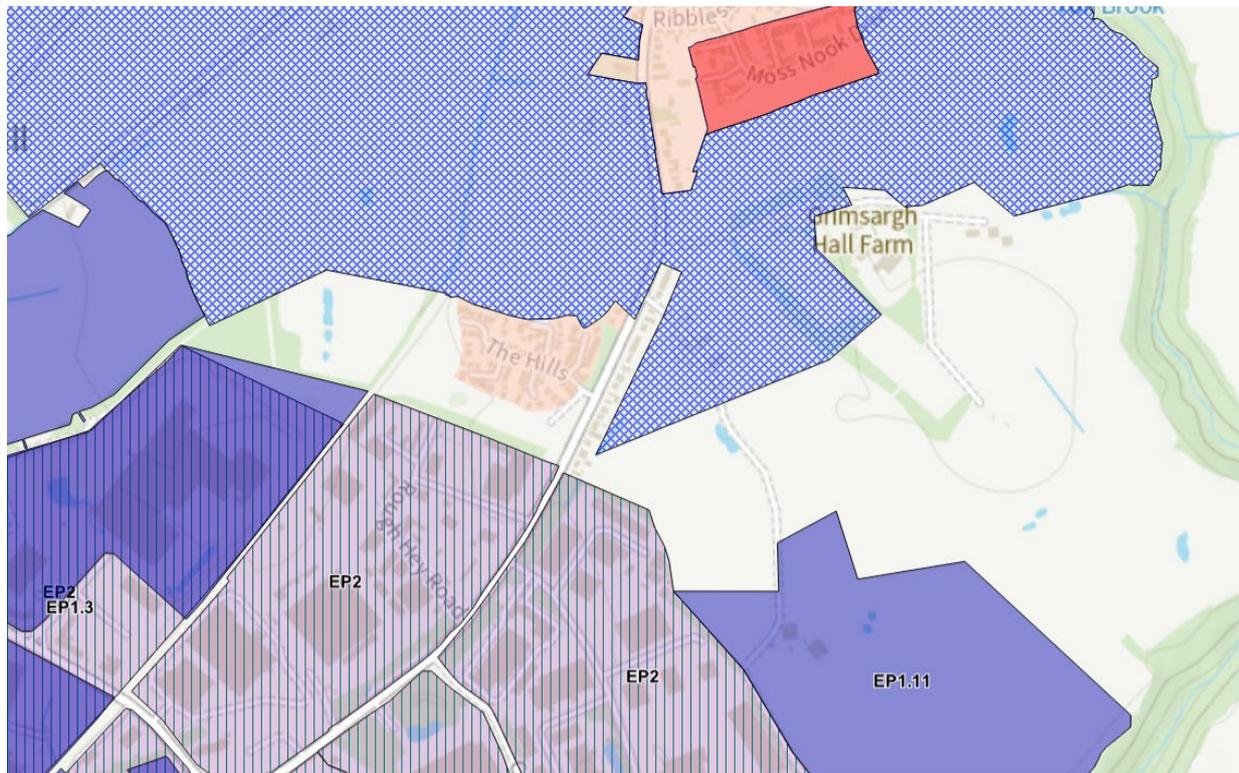
The Site lies on the eastern edge of Preston, the Tier 1 settlement. It is located adjacent to a major employment and services area with existing residential development to the northern and western boundary.

A significant farm holdings / local employment centre is located to the north of the site, built form extending into the site area. To the northeast of the site lies a substantial tree belt which is a significant green barrier. To the south and east of the site lies an employment allocation and large solar farm, which are illustrated on the extract plans below.

To further assist in understanding the context of the Site, we refer to the extract from the Preston Local Plan Policies maps below. This identifies the employment allocations and existing industrial and housing estates.

The blue hatched area is the extent of the adopted Area of Separation policy. We address this below but note that Story Homes considers that the site can be developed, in whole or part, with no detrimental impact on the gap between Grimsargh and East Preston.

Extract from the adopted Preston Local Plan (2015)



Assessment against evidence base - SHELAA

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

Extract from SHELAA

19P117	Land East of Longridge Road	Other	Preston Rural East	Housing	Site does not accord with Spatial Strategy - site within AnS and OC.
--------	-----------------------------	-------	--------------------	---------	--

This final column in the SHLAA states that it is not in accordance with the Spatial Strategy, within the Open Countryside (OC) and within an Area of Separation. Story Homes considers that the Council has failed to undertake a robust site selection assessment of the omission site.

The Site lies on the edge of the Tier 1 settlement of Preston. It is not in the Green Belt and the Authorities have allocated land on the edge of Preston elsewhere in the Plan. Therefore, it is inconsistent to discount the site from further assessment due to not being in accordance with the overall Spatial Strategy, when the Council takes the equivalent approach elsewhere.

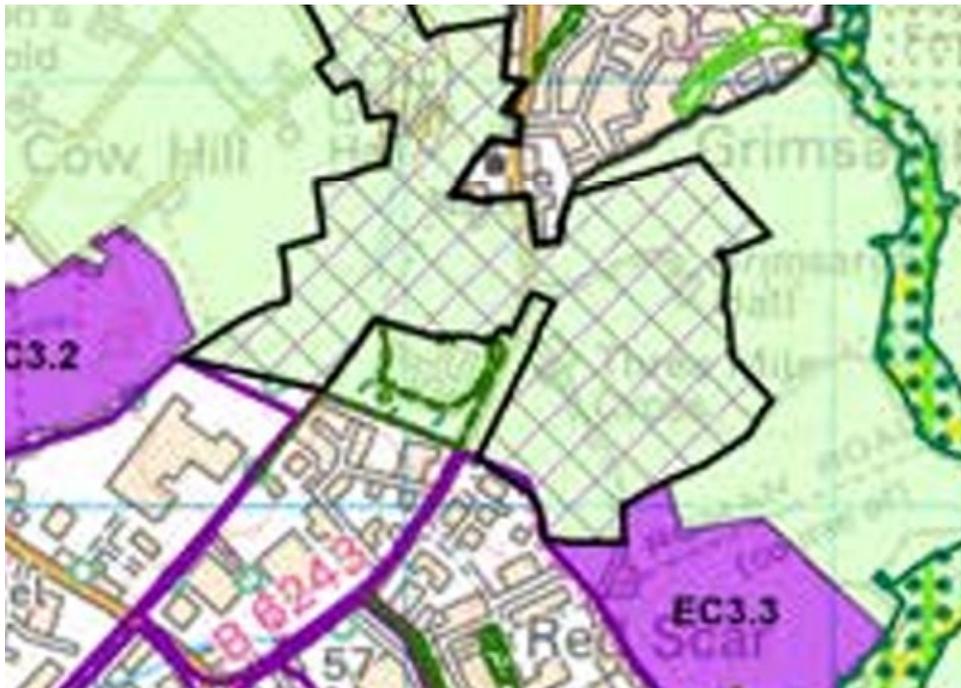
The same finding applies to the criteria of Open Countryside. All land out with the urban area is in Open Countryside and the Council has allocated equivalent sites for development elsewhere. In this case the site has development on all sides and is entirely contained. Development would not lead to further encroachment into the Countryside.

In relation to the Area of Separation policy, the existing Local Plan does have a small area of separation that affects the northern part of the subject site. This is the triangular shape depicted above. However, the existing Cowell and Sons farmstead lies within the Area of Separation and is substantial built form.

The proposed development would also sit behind the existing row of residential properties located along Longridge Road so would not result in a greater perception of the settlements merging than in the current context.

In the Regulation 19 Local Plan, the Council proposes to extend the Area of Separation as per the extract below. Story Homes objects to this proposal as it is not based on any logical approach and will not provide an effective policy approach for the reasons set out below.

Extract from regulation 19: Policies Maps



Evidence base document EV6 provides the Council's evidence for open space assessments and designations. Table 4.3 defines the gap between Grimsargh and Preston as 'Fragile'.

As a starting point, the very basis for undertaking this analysis is unclear. Paragraph 3.13 of EV6 refers to Green Belt purpose 2 and states:

3.13 This spatial role of landscape is already to an extent considered as part of the assessment of contribution to Green Belt Purpose 2, as set out in the separate Green Belt Assessment report, but that analysis is concerned with gaps between towns, rather than gaps between smaller settlements. Land forming gaps between smaller settlements that in turn contributes to the separation of towns will make some contribution to Green Belt Purpose 2, but gaps unrelated to towns will not.

Paragraph 3.16 of the same reports states:

3.16 The principles of this assessment are the same as those employed in the assessment of NPPF Green Belt Purpose 2. The assessment has considered both the physical and visual role that intervening open land plays in preventing the merging of settlements, with reference to the following:

Story Homes objects to the baseline assessment and methodology. The land is not, nor ever has been within the Green Belt. It is fundamentally wrong to seek to apply Green Belt purposes to land that does not fulfil a Green Belt function.

The original Area of Separation adequacy addresses the main point of concern in this case, which is the narrow area of land between the end of Longridge Road and Grimsargh. However, the visual gap between the two settlements is now extremely limited as linear development at Grimsargh has eroded any perception of distance between settlements. In particular, we note that the only gap left is the small section between John Turner Construction entrance and number 30 Preston Road, a substantially remodelled dwelling. The Reg 19 Proposals Map does not fully reflect this as it identifies a large existing area of residential development to the north east of the Story Homes site as being within the open countryside and shaded green. This is misleading and should be more clearly identified as built form.

The author of EN6 acknowledges this in their assessment, which states:

This is very narrow in comparison to the size of both Preston and Grimsargh and there are no significant separating features between the two settlement edges within this part of the gap. However, within the wider gap to the east and west of this narrow gap, there are a number of woodland belts that form separating features, including those around Grimsargh Hall Farm to the east and those to the north of the Red Scar industrial estate to the south-west.

The conclusions of the author as above accept that there are significant landscape features to the west of the gap that form separating features around Grimsargh Hall Farm. Story Homes agrees with this assessment and refers to its site location plan and Development Framework document.

In fact, Story Homes uses these features to contain any development. The existing woodland belts, the existing linear development along Longridge Road, the John Turner business and access road and the existing and allocated employment land all contain the Story Homes site west of Longridge Road.

On the basis of the conclusions of ENV6 above, there is no justification to extend the Area of Separation further to the south-west. It would not be effective as the land is already contained.

Summary

Story Homes objects to the Local Plan as drafted. The proposed approach to extending Areas of Separation is not justified and appears to be based upon a Green Belt esq. policy approach. The actual assessment of the site by the author of the evidence base identifies that the land is already contained. There is therefore no reason to extend the Area of Separation.

As per our submissions overall, there is insufficient land being allocated to meet the needs of Central Lancashire. Land at Longridge Road, Red Scar is well related to the Tier 1 settlement of Preston and should be allocated for development.

Supporting Documents

- Development Framework document prepared by Stantec.