

Broadgrove

PLANNING & DEVELOPMENT LTD

Regulation 19 Publication Consultation

Land to the east and west of the M6,
Leyland PR25 5DA

On behalf of The Trustees of the Worden
Estate

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1. INTRODUCTION

- 1.1. Broadgrove Planning & Development have been instructed by The Trustees of the Worden Estate to prepare and submit a Supporting Statement for a mixed-use allocation to be considered as part of the Central Lancashire Publication (Regulation 19) Local Plan consultation opportunity.
- 1.2. Part of the site that is included for consideration in this submission was submitted as part of the Regulation 18 consultation in February 2023, by Highgrove, who were promoters of the site at the time. These representations are submitted on behalf of the owners of the land.
- 1.3. The purpose of this statement is twofold. Firstly, to review the Local Plan consultation document and then secondly to promote the site for development by demonstrating why it is suitable for an allocation for the uses proposed.
- 1.4. The following plans and documents are submitted in support of this submission:
 - Representation form;
 - Plans prepared by Baldwin Design Consultancy Ltd
 - Coloured Sketch Masterplan
 - Composite Masterplan
 - Land Use Plan
- 1.5. This supporting Statement will firstly provide details of the site, then setting out the proposed uses. The Statement then considers the national planning policy context before highlighting the key parts of the Reg 19 consultation documents and comments. The case will then be made for the site for an allocation.

2. THE SITE

- 2.1. The parcels are submitted as one site submission, which although dissected by various landforms, is for consideration comprehensively. To assist the reader with the identification of various parts of the site, it is split up into 4 parcels of land (A-D) as indicated on the Land Use Plan, which supports the submission.
- 2.2. All of the parcels are set within the Green Belt as identified on the adopted proposals map and the draft proposals map. They are all used for agricultural purposes.
- 2.3. A high-pressure gas pipe traverses parcels B and C in a northerly/southerly direction. This has been explored and whilst it is a constraint, it also offers the opportunity for site enhancement.
- 2.4. A description of each parcel of land is set out below.

Parcel A - Land to the south of Heald House Road

- 2.5. This is a triangular plot located to the west of the M6 which runs adjacent to the eastern boundary. It covers an area of 2.12ha. The site is bound by the West Coast Mainline to the west and Heald House Road to the north. It is formed of a singular agricultural field with trees lining the north and east boundaries. The settlement boundary of Leyland lies directly to the north and west, with the local context being defined by residential development.
- 2.6. The site is within the defined Green Belt and is not proposed for allocation in the Regulation 19 consultation document.
- 2.7. The site is entirely within Flood Zone 1, where the risk of flooding is at its lowest. There are no Listed Buildings or Conservation Areas within the site, but the Grade II listed Heald House lies approximately 70m to the north. The site is not subject to any statutory landscape or ecology designations.

Parcel B – South of Heald House Road

- 2.8. This is located to the south of Heald House Road, lying between the M6 motorway to the west and Wigan Road to east, beyond which is Matrix Industrial Park. It is formed of two connected agricultural fields bordered by a band of tree cover to the site and field boundaries. The site area is approximately 3.98 ha.
- 2.9. The site is within the defined Green Belt and is not proposed for allocation in the Regulation 19 consultation document.
- 2.10. The site is entirely within Flood Zone 1, where the risk of flooding is at its lowest. There are no

Listed Buildings or Conservation Areas within the site, but the Grade II listed Heald House lies approximately 100m to the north west. The parcel is not subject to any statutory landscape or ecology designations.

Parcel C – West of Wigan Road

- 2.11. This is located directly to the south of Parcel B considered in the previous section, lying between the M6 motorway to the west and Wigan Road to east, beyond which is Matrix Industrial Park. The site measures approximately 3.4ha. Charnock Farm, an events venue, lies to the south. It is formed of a single agricultural field bordered by a band of tree cover to the field boundaries.
- 2.12. The site is within the defined Green Belt and is not proposed for allocation in the Regulation 19 consultation document.
- 2.13. The site is entirely within Flood Zone 1, where the risk of flooding is at its lowest. There are no Listed Buildings or Conservation Areas within the site, but the Grade II listed Heald House lies over 350m to the north west. The site subject to any statutory landscape or ecology designations.

Parcel D – West of Wigan Road

- 2.14. This part of the site is located to the south west of Parcel C and beyond the West Coast Railway Line. This parcel measures 9.60 hectares.
- 2.15. The parcel is entirely within Flood Zone 1, where the risk of flooding is at its lowest. There are no Listed Buildings or Conservation Areas within the site. The site is not subject to any statutory landscape or ecology designations.
- 2.16. The site is within the defined Green Belt and is not proposed for allocation in the Regulation 19 consultation document.

3. PROPOSED USES

- 3.1. This chapter of the statement should be read in conjunction with enclosed plans prepared by Baldwin Design Consultancy Ltd. To confirm, whilst the entire site is broken down into parcels of land for identification purposes, the submission is made on the basis of a complete mixed-use development.

Parcel A

- 3.2. This is proposed for residential development accommodating 64 units. The enclosed plan proposes the following schedule of accommodation.

- 18 apartments
- 46 houses

- 3.3. This triangular shaped site proposes a residential allocation as part of the emerging plan. One access point is proposed from Heald House Road to the north.

- 3.4. The houses are proposed in the northern half of the site, serviced by both an adopted highway and private road for a smaller number of residential units.

- 3.5. The built form terminates towards the southern end of the site with the apartments split over two blocks with vehicular parking in front.

- 3.6. The southern third of the site is dedicated to play space and general open amenity space.

- 3.7. All boundaries to the site retain a significant amount of landscaping to offer a suitable buffer to the adjacent boundaries.

Parcel B

- 3.8. This part of the site is proposed for a mixed use of commercial and retail.

- 3.9. The northern part of this parcel measures 0.83 ha and is proposed for convenience retail with a building of 1630 sq m proposed. Access to this parcel will be from the east from Wigan Road.

- 3.10. The remainder of this parcel will be used for commercial space (E, B2 and B8). The indicative masterplan indicates 8 buildings ranging from 210 sqm through to 1269 sqm. Some of these buildings are single occupancy and some are multi occupancy to suit a range of occupiers.

- 3.11. Access to this part of the site will utilise an existing access to the east from Wigan Road and then the proposal layout spurs to the north.

Parcel C

- 3.12. This parcel will be used for commercial space (E, B2 and B8). The indicative masterplan indicates 6 buildings ranging from 950 sqm through to 2295 sqm. Some of these buildings are single occupancy and some are multi occupancy to suit a range of occupiers.

- 3.13. Access to this part of the site will utilise an existing access to the east from Wigan Road and then the proposal layout spurs to the south.

- 3.14. Parcels B and C are connected by both the internal road network and also the pedestrian walkways that link the sites in a north/south axis.

Parcel D

- 3.15. This parcel of the site will be used for landscape and BNG enhancement in association with the other parcels referenced above for development. The enhanced recreational opportunities are significant and will assist with the public footpath experience that traverses the site leading from and to Buckshaw Village and to the south of Leyland.

4. NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 4.1. At a national level, planning policy and guidance is contained in the National Planning Policy Framework (NPPF). The updated NPPF (December 2024), sets out the Government's vision for future growth. The NPPF must be considered in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
- 4.2. It should be highlighted that by virtue of the timing of this Regulation 19 consultation, both the NPPF from December 2023 and December 2024, should be highlighted.
- 4.3. The NPPF 2024, paragraph 234 states the following, *'For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: a. the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need;'*
- 4.4. Paragraph 235 continues by stating, *'Where paragraph 234a, b, c, d or e apply, the plan will be examined under the relevant previous version of the Framework.'*
- 4.5. Paragraph 237 continues further by stating, *'Those local plans that reach Regulation 19 (pre-submission stage) on or before 12 March 2025 and whose draft housing requirement meets less than 80% of local housing need should proceed to examination within a maximum of 18 months from 12 December 2024, or 24 months of that date if the plan has to return to the Regulation 18 stage.'*
- 4.6. As will be set out within this Statement, the Council meets the trigger for paragraph 234a in that consultation commenced regarding the Regulation 19 before the prescribed date and secondly, the proposed housing allocations are 80% of the new housing requirement set out within the new Standard Methodology 2024. Accordingly, as set out in Paragraph 235, the NPPF 2023 will be used as the relevant framework upon which to consider this Central Lancashire Local Plan.
- 4.7. The relevant parts of the NPPF 2023 are set out below.
- 4.8. The NPPF acknowledges that planning policies and decisions should play an active role in guiding development towards sustainable development solutions, but in doing so, should take local circumstances into account, to reflect the character needs and opportunities of each area.
- 4.9. Paragraph 8 states that there are three dimensions to sustainable development: economic, social and environmental and, as set out in paragraph 9, these provide broad objectives to be delivered through planning decisions.

4.10. At the heart of the NPPF is a presumption in favour of sustainable development as set out in paragraph 11. This means, inter alia:

'For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

4.11. Chapter 3 relates to Plan Making and the following should be noted. Paragraph 16:

'Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).'

4.12. Paragraph 17 states that:

'The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. These strategic policies can be produced

in different ways, depending on the issues and opportunities facing each area. They can be contained in:

a) joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or

b) a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred.'

4.13. Paragraph 18 states,

'Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.'

4.14. Paragraph 31 states:

*'The preparation and review of all policies should be **underpinned by relevant and up-to-date evidence**. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'*

4.15. Paragraph 35 relates to the examining plans and states the following:

'Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.'

4.16. The NPPF advocates that planning policies and decisions should promote the effective use of land

and that Local Planning Authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the Framework.

- 4.17. Chapter 8 considers the cultivation of healthy and safe communities. Decisions should aim to achieve places which promote social interaction and enable and support healthy lifestyles.
- 4.18. Chapter 9 “Promoting sustainable transport” states in paragraph 107 that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 4.19. Chapter 11 advocates for the effective use of land in meeting need for homes and other uses. Paragraph 125 (d) states that planning decisions should *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively”*.
- 4.20. Chapter 13 concerns protecting Green Belt land. Paragraph 143 outlines the five purposes that the Green Belt serves:
- ‘a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns; and*
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.’*
- 4.21. Paragraph 154 sets out that substantial weight is given to any harm to the Green Belt when considering planning applications, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.’

5. REGULATION 19 DRAFT LOCAL PLAN AND SUPPORTING EVIDENCE BASE

Draft Local Plan

- 5.1. Central Lancashire Core Strategy' which was produced jointly by Chorley, Preston and South Ribble Councils and adopted in 2012. It sets out the long term spatial vision for Central Lancashire and the overall strategy for delivering that vision.
- 5.2. Each authority also has a Local Plan, all adopted in 2015, which set out where new development such as houses and employment units should be built and include development management policies which are used to determine planning applications.
- 5.3. However, these plans are not compliant with changes in national planning policy. The new Central Lancashire Local Plan is therefore being prepared to help shape the way the area develops up to 2041, based on up-to-date evidence. This will be a single, joint Local Plan rather than separate plans, so it will be easier to read and use.
- 5.4. The focus of these representations is land within South Ribble Council where the site hereby promoted is located. Comments are hereby provided.
- 5.5. The growth and ambition proposed within the draft Local Plan is quite clearly the absolute minimum that the Council needs to provide to be policy compliant. This is demonstrated on two levels. Firstly, the Regulation 19 consultation has been rushed through prior to the 12 March 2025 NPPF 2024 deadline, to avoid having to provide the full housing allowance in accordance with the new Standard Methodology. The 'benefits' to the Council of this approach and only providing 80% of the new requirement is that there is a significant reduction (20%) in the number of dwellings that need to be accommodated within the Local Plan allocations. Secondly, the Local Plan is then considered against the NPPF 2023 rather than the NPPF 2024.
- 5.6. Policy HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements, states, '*1. The housing requirement for Central Lancashire is for 23,652 homes to be delivered in the Local Plan period between 2023 and 2041, an annual average of 1,314 homes. c) 8,280 homes in the South Ribble Borough Council area (460 dwellings per annum)*'
- 5.7. It should be noted that the Government published the new LHN figures in December 2024. For South Ribble, the new calculated LHN figure is 489 dwellings per annum. This has increased the local housing need figure for South Ribble; previously, the LHN requirement figure was 169

dwellings per annum.

- 5.8. Policy HS3: Housing Allocations South Ribble. This proposes allocations across 19 sites, from as few as 5 units up to 500 units, creating a total of 2,333 units.
- 5.9. Policy EC1 (Strategic Policy): Scale of Economic Growth, states that for South Ribble the Combined employment OAN is 56.99 hectares.
- 5.10. Policy EC4: Employment Allocations South Ribble, proposes two allocations totalling 11.30 hectares.
- 5.11. Policy EC6: Mixed Use Allocations South Ribble, proposes just one mixed use allocation, with a total area for employment of 50 hectares.
- 5.12. This total employment allocation quantum is split across just three sites with one site, Cuerden, accommodating the majority of the land, equating to 50 hectares. For the reasons subsequently provided this is considered insufficient.

Evidence Base

Green Belt

- 5.13. Open Land Designations Study Green Belt Assessment – Main Report Prepared by LUC October 2022. The report provides a strategic assessment of how land in the area contributes to the following:
 - contributes to the Green Belt purposes as defined in paragraph 138 of the National Planning Policy Framework (NPPF);
 - demonstrates valued landscape characteristics (including the identification of any areas where landscape quality can be considered of ‘above ordinary’ value);
 - provides landscape settings which are important to the character of settlements; and
 - maintains gaps between settlements in the Preston City Council area that are not designated as part of its Open Countryside (policy EN1) area.
- 5.14. The site hereby promoted is set within Parcel P18 within this document. It should be noted that that Parcel 18 covers a much wider area than the client’s land holding. In terms of the assessment against the Green Belt purposes it makes the following comments.
- 5.15. Overview - The north and south of the parcel comprises agricultural land between Clayton le Woods and Leyland adjacent to the M6 and the east of the parcel comprises of Leyland Golf

Course between Clayton-le-Woods and Buckshaw Village. There is an area of reduced openness in the southwest of the parcel that is occupied by Traceys Industrial Estate. There is also some residential development along Moss Lane and Lydiate Lane in the northern half of the parcel, but this does not have a significant impact on openness.

5.16. Green Belt purposes:

- Purpose 1 – Checking the unrestricted sprawl of large built-up areas

Limited / no contribution The parcel makes a weak contribution to preventing sprawl of the large built-up area. The parcel is entirely contained by the large built-up area and therefore lacks connectivity to the wider Green Belt.

- Purpose 2 – Preventing neighbouring towns from merging into one another

Significant contribution - Land within the parcel makes a significant contribution to preventing neighbouring towns from merging into one another. The northern half of the parcel lies in a very narrow gap between Clayton-le-Woods and Leyland to the west. The south of the parcel also lies in a very narrow gap between Clayton le-Woods and Buckshaw Village to the south. Although land within the parcel lacks strong distinction from urban development, due to the proximity of urbanising influences within the parcel, the remaining open land does still contribute to some distinction between Leyland and Clayton-le-Woods and Leyland and Buckshaw Village.

- Purpose 3 – Assisting in safeguarding the countryside from encroachment

Moderate contribution - The parcel has some rural uses but the narrowness of the gaps between urban areas means that nowhere has strong distinction from urban edges. Development within the parcel would only constitute a moderate encroachment on the countryside.

- Purpose 4 – Preserving the setting and special character of historic towns

Limited / no contribution The parcel does not contain land that contributes to the setting or special character of any historic town.

- Purpose 5 – Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land

Equal contribution - All Green Belt land is considered to make an equal contribution to this purpose.

5.17. Concluding assessment states,

‘Key considerations with regard to potential harm to Green Belt purposes from substantial release of land,’ Prevention of the coalescence of towns (Purpose 2) is likely to be the most significant consideration when determining the potential for release of land for development within this parcel. Land within the whole parcel lies in very narrow settlement gaps between Clayton-le-Woods and Leyland and Clayton-le-Woods and Buckshaw and any strategic scale release would result in significant narrowing of the settlement gap. There is some existing residential development along Moss Lane and Lydiate Lane in the northern half of the parcel, but any further strategic scale development adjacent to these areas would result in Clayton-le-Woods and Leyland almost becoming merged, apart from the M6 providing separation. Development at Traceys Industrial Estate, to the north of the B5248, (map point A) makes a weaker contribution to Green Belt Purpose 2 as the extent of existing development within this area reduces the impact that any further development would have.’

5.18. It should be noted that this evidence base to support the Local Plan was written under a different national planning policy context (i.e. pre- NPPF 2024).

Central Lancashire Employment Land Study – Land Supply and OAN Update 2024 (Final Report 2025)

5.19. Executive summary xi). The combined OAN, linking office and industrial/warehouse needs - South Ribble – 56.99 ha.

5.20. Table ES6 – Sites Analysis – South Ribble Preferred Sites. SR/EP1.2, SR/HS1.1 (19S052). Cuerden Strategic Site. Notable deliverability comments, **‘Several schemes have been proposed here and ultimately not progressed due to a range of factors.** *There is a stronger commitment to taking things forward now however, with plans backed by an established developer partner and land under public sector control. Proposals, which have Outline consent, are now focused on B2/B8 premises which better reflects market demand, with interest identified from national/regional and local businesses. Viability testing, submitted for the application and completed by CBRE in July 2022 (‘Financial Viability Statement, Page 7) also indicates that the scheme is viable. Development is expected to come forward in phases to avoid oversupplying*

the market at any one time.'

- 5.21. Paragraph 1.20 states, 'Against the realistic employment land supply of Central Lancashire, there were shortfalls in Chorley and South Ribble, but not Preston: South Ribble – 25.68 ha (further need).'
- 5.22. 1.23 'To meet such further needs it was recommended that Chorley look for opportunities around the M61 Corridor and Buckshaw Village. **South Ribble should consider similar opportunities along its strategic road corridors, particularly for B2/B8 premises.'**

South Ribble Borough Council Retail and Leisure Study Final Report September 2017

- 5.23. The retail and leisure evidence base that underpins the draft Local Plan dates back to 2017. In accordance with the requirements of the NPPF (2023 and 2024), it is considered that the evidence base needs to be updated to reflect the revised growth ambitions from Central Government. The following should also be noted.
- 5.24. Paragraph 7.36 states that, 'Full details of the assumptions made in estimating the turnover of the commitment are provided in the notes which accompany Table 26d of Appendix 5. If the above commitments did come forward, it would act to reduce the comparison goods expenditure surplus which is evident across the medium to long term. Table 7.6 identifies that, after taking account of the commitments, there is no identified capacity in the short to medium term, **with a surplus of £20.9m identified by 2034.'**
- 5.25. Given the recommendations of the report (albeit 7.5 years out of date) and combined with the growth ambitions from Central Government, it is surprising that the Regulation 19 Draft Local Plan does not propose any retail allocations.

6. THE PLANNING CASE

Release from the Green Belt

- 6.1. The site is submitted as one large development dissected by a number of other landforms. It is considered important to promote the site in this manner so that the Council can consider the benefits of the developments comprehensively. However for the purposes of releasing the sites from the Green Belt, it is considered important to assess the parcels individually so the contribution that they make can be assessed.
- 6.2. It is important to highlight the evidence base with regard to Green Belt.
- 6.3. Open Land Designations Study Green Belt Assessment – Main Report Prepared by LUC October 2022. The report provides a strategic assessment of how land in the area contributes to the following:
 - contributes to the Green Belt purposes as defined in paragraph 138 of the National Planning Policy Framework (NPPF);
 - demonstrates valued landscape characteristics (including the identification of any areas where landscape quality can be considered of ‘above ordinary’ value);
 - provides landscape settings which are important to the character of settlements; and
 - maintains gaps between settlements in the Preston City Council area that are not designated as part of its Open Countryside (policy EN1) area.
- 6.4. A summary against the five purposes can be found below.
 - Purpose 1 – Checking the unrestricted sprawl of large built-up areas - Limited/no contribution
 - Purpose 2 – Preventing neighbouring towns from merging into one another -Significant contribution
 - Purpose 3 – Assisting in safeguarding the countryside from encroachment - Moderate contribution
 - Purpose 4 – Preserving the setting and special character of historic towns - Limited/no contribution
 - Purpose 5 – Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land - Equal contribution

- 6.5. The site hereby promoted is set within Parcel P18 within this document. We have undertaken our own assessment against the five purposes for each parcel of land as below. Note that purposes 4 and 5 are not applicable in this instance so have not been assessed accordingly.

Parcel A

To check the unrestricted sprawl of large built-up areas

- 6.6. The site represents a single field which is entirely contained by urbanising features to all sides. The site has strong and durable boundaries, adjoined by residential development in Leyland to the west beyond the railway line and north beyond Heald House Road. The M6 adjoins the eastern boundary. As such, the site has clear boundaries to all sides which ensure development of the parcel does not result in unrestricted sprawl of large built-up areas.

- 6.7. The Green Belt Assessment notes the wider parcel makes limited/no contribution to preventing sprawl of the large built-up area given it is entirely contained by the large built-up area and lacks connectivity to the wider Green Belt. This is particularly pertinent in this case given the parcels containment between the residential areas of Leyland and M6 motorway.

- 6.8. Accordingly, we consider this site to make no more than a 'weak' contribution to this purpose.

To prevent neighbouring towns merging into one another

- 6.9. We consider that the site makes a 'weak' contribution to preventing neighbouring towns merging. The site forms a logical addition to Leyland to the west of the M6, the defining boundary feature separating the settlement from the Green Belt along much of its eastern boundary. The gap between Leyland and Buckshaw Village would be retained to the east, being over 200m in length which follows the existing settlement pattern along the M6 boundary. Development of the site would therefore not result in any additional merging of Leyland and Buckshaw Village.

To assist in safeguarding the countryside from encroachment

- 6.10. We consider the site makes a 'weak' contribution to this purpose, as whilst it unarguably contains countryside features given the existing field and tree cover, there are multiple urbanising influences around the site. Notably, the site adjoins residential development in Leyland to the north and south/west boundaries, alongside the M6 motorway to the east. The site is therefore highly contained and viewed in the context of urban development rather than the wider countryside setting.

- 6.11. The proposed layout retains a significant landscape buffer to all boundaries thereby assisting with this part of the assessment.

- 6.12. This therefore confirms that land to the south of Heald House Road (Parcel A) does not fulfil the

five purposes for including land in the Green Belt, making no more than a 'weak' contribution.

Parcel B

To check the unrestricted sprawl of large built-up areas;

6.13. Whilst the site contains few urbanising features and does contribute to openness, its development would form a logical western extension to the Matrix Industrial Park adjoining Wigan Road. The Green Belt Assessment notes the wider parcel makes limited/no contribution to preventing sprawl of the large built-up area given it is entirely contained by the large built-up area and lacks connectivity to the wider Green Belt. The areas bordering the site are substantially built up, with the industrial park to the east and M6 to the west.

6.14. The site benefits from strong and durable boundaries, being contained by Heald House Road to the north, beyond which are elements of built form. The western boundary is bound by the M6, whilst the east is Wigan Road and Matrix Industrial Park. To the south lies a band of tree cover off Back Lane, providing a defensible southern boundary. Beyond this is a further field (Parcel D considered in the following section) with the built form of Channock Farm beyond. Taken together, these features provide a clear boundary which ensures development of the parcel does not result in unrestricted sprawl of large built-up areas.

6.15. Accordingly, we consider this site to make no more than a 'weak' contribution to this purpose.

To prevent neighbouring towns merging into one another

6.16. We consider that the site makes a 'moderate' contribution to preventing neighbouring towns merging. The gap between Matrix Industrial Park and Leyland would be reduced, but the M6 motorway remains as a clear boundary between the land parcel and settlement of Leyland beyond which prevents the two settlements from merging into one another.

6.17. The sites surrounding urban features, notably the industrial park and M6 means the land parcel is heavily influenced by the urban development. Further urban influences exist within the Green Belt to the north in the form of industrial/commercial development and south at Charnock Farm. As such, there is little existing distinction between urban development in the area between the settlements, with the site representing a logical extension to Buckshaw Village within the existing urbanised context.

6.18. The proposed layout retains a significant landscape buffer to all boundaries thereby assisting with this part of the assessment.

To assist in safeguarding the countryside from encroachment

6.19. We consider the site makes a 'weak' contribution to this purpose, as whilst it unarguably contains

countryside features given the existing fields and tree cover, there are multiple urbanising influences around the site. Notably, the site adjoins the existing industrial park to the east and M6 Motorway to the west. The northern boundary is also contained by Heald House Road to the north and built form beyond. The site is therefore highly contained and viewed in the context of urban development rather than the wider countryside setting.

- 6.20. This section confirms that land to the west of Wigan Road (Parcel B) does not fulfil the five purposes for including land in the Green Belt, making no more than a ‘weak’ to ‘moderate’ contribution.

Parcel C

To check the unrestricted sprawl of large built-up areas;

- 6.21. As with Parcel B, whilst the site contains few urbanising features and does contribute to openness, its development would form a logical western extension to the Worden Industrial Estate adjoining Wigan Road. The Green Belt Assessment notes the wider parcel makes limited/no contribution to preventing sprawl of the large built-up area given it is entirely contained by the large built-up area and lacks connectivity to the wider Green Belt. The areas bordering the site are substantially built up, with the industrial park to the east and M6 to the west.
- 6.22. The site benefits from strong and durable boundaries, being contained by Parcel B and Heald House Road to the north, beyond which are elements of built form. The western boundary is bound by the M6 and the West Coast Railway Line, whilst to the east is Wigan Road and Matric Industrial Park. The built form of Channock Farm to the south from the wider Green Belt to the south. Taken together, these features a clear boundary which ensures development of the parcel does not result in unrestricted sprawl of large built-up areas.
- 6.23. Accordingly, we consider this site to make no more than a ‘limited’ contribution to this purpose.

To prevent neighbouring towns merging into one another

- 6.24. We consider that the site makes a ‘moderate’ contribution to preventing neighbouring towns merging. The gap between Matrix Industrial Park and Leyland would be reduced, but the M6 motorway remains as a clear boundary between the land parcel and settlement of Leyland beyond which prevents the two settlements from the merging into one another.
- 6.25. The sites surrounding urban features, notably the industrial park and M6 means the land parcel is heavily influenced by the urban development. Further urban influences exist within the Green Belt to the north in the form of industrial/commercial development and south at Charnock Farm. As such, there is little existing distinction between urban development in the area between the settlements, with the site representing a logical extension to Buckshaw Village within the existing

urbanised context.

- 6.26. The proposed layout retains a significant landscape buffer to all boundaries thereby assisting with this part of the assessment.

To assist in safeguarding the countryside from encroachment

- 6.27. We consider the site makes a 'weak' contribution to this purpose, as whilst it unarguably contains countryside features given the existing field and tree cover, there are multiple urbanising influences around the site. Notably, the site adjoins the existing industrial park to the east and M6 Motorway to the west. The southern boundary is also contained by the built form of Charnock Farm to the south. The site is therefore highly contained and viewed in the context of urban development rather than the wider countryside setting.

Parcel D

- 6.28. The proposal for this parcel is for it to be Biodiversity Net Gain and recreational purposes which are considered acceptable forms of development in Green Belt and would constitute considerable enhancement and betterment.
- 6.29. An assessment against the Green Belt purposes has therefore not been undertaken.

The Case for Further Residential Allocations

- 6.30. The proposed housing figures set out within policy, supported and clarified by Appendix 3 and supported by the evidence base document, Housing Land Supply Position Statement at 1 April 2024 Addendum, February 2025, are the minimum that need to be provided. It shows no ambition for growth.
- 6.31. It is also noted that the supply of housing over the plan period is based heavily (18%) on windfall allowances. This is justified on the basis of previous delivery. However, there are two matters to note here. The high windfall delivery was when the Council were required to deliver only 169 units a year and therefore had far fewer allocations over the plan period. Secondly, the draft Regulation 19 Local Plan proposes allocations as few as 5 units. This would suggest that there are far fewer opportunities.
- 6.32. It is also notable that the Regulation 18 consultation proposed a windfall allowance set out within Table 3 on page 65 of 265 units spread over a 15-year period, equating to 17.6 residential units a year. This figure has increased dramatically between the two versions, suggesting that the Council have altered this to accommodate the significant increase in housing provision that they are now required to provide (albeit 80% of the new standard methodology). If the Council were confident

of such high windfall delivery, then why didn't they suggest this in the previous version of the plan?

The Case for Commercial Development

- 6.33. As set out within the preceding chapter, the proposed employment allocations show a complete lack of growth and ambition. The clear focus appears to be avoiding any sort of Green Belt release rather than identifying areas for growth which Central Government are clearly pushing.
- 6.34. It is notable that South Ribble Council are only proposing three employment allocations over the plan period. Furthermore 50 hectares of this need is to be provided on one single site at Cuerden (mixed use allocation). The comments within the Employment Land evidence base should be duly noted that this site has been earmarked for development for decades and has never come forward. It would seem appropriate and sensible therefore to consider other sites as part of the employment supply, particularly those in and around strategic networks as also advocated. If the Cuerden site continues to not come forward then this would leave only two sites delivering only 20% of the required amount.

The Case for Retail Development

- 6.35. No retail or leisure allocations are proposed within the draft Local Plan, despite the evidence base quite clearly setting out that there is a need for further retail development.
- 6.36. It is also notable that the retail evidence based for the Local Plan is 7.5 years and thereby utilising this is completely contrary to the NPPF. It does not factor in the revised housing figures.
- 6.37. The case is made that the evidence base is out of date and also there is no intention within the plan to accommodate any retail growth outside of the centres within South Leyland.

7. CONCLUSIONS

- 7.1. Broadgrove Planning and Development Ltd have prepared Supporting Statement on behalf of The Trustees of the Worden Estate to support the submission of a site for a mixed-use allocation in the emerging Local Plan.
- 7.2. The representations have been two-fold. Firstly, to consider the draft Local Plan Regulation 19 and its associated evidence base and secondly set out why the site should be considered for Green Belt release and a mixed-use allocation.
- 7.3. This statement has demonstrated that the prospective site is suitable, available and achievable for the delivery of housing, commercial and retail in the short to medium term. Whilst further work is required to be done, at this stage no technical constraints have been identified that would render the site undeliverable for development could not be overcome at the detailed design stage.
- 7.4. We trust that the details provided are acceptable and provide clarity on the prospective site in terms of its suitability, availability, and achievability for development. We would welcome any early engagement with the Council to discuss the site in more detail. If you need any further information, please do not hesitate to contact Broadgrove directly (am@broadgrove.co.uk).

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