

# Land off Garstang Road, Bilsborrow, Preston, PR3 5AD

Hearing Statement

REPRESENTATIONS ON CENTRAL LANCASHIRE'S LOCAL PLAN  
EXAMINATION

November 2025

# REPORT CONTROL

<b>Document type</b>	Representations on Central Lancashire's Local Plan Examination
<b>Project</b>	Land off Garstang Road, Bilsborrow, Preston, PR3 5AD
<b>Client</b>	25-2354
<b>Job Number</b>	Representations on Central Lancashire's Local Plan Examination

## Document Checking

<b>Primary Author</b>	Josh Hellowell
<b>Contributor</b>	
<b>Reviewer</b>	Paul Walton

## Revision Status

<b>Issue</b>	<b>Date</b>
Draft v1	3.11.25
Final	6.11.25

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## **/1 INTRODUCTION**

- 1.1. PWA Planning has been commissioned by Seddon Homes to produce this Hearing Statement which also supplements previous representations made during each stage of the Central Lancashire Local Plan's progression on behalf of both Seddon and PWA Planning. The aim of the representations is to review and comment upon the relevant Matters, Issues and Questions raised by Inspectors Anne Jordan BA(Hons) MRTPI and Alison Partington BA(Hons) MA MRTPI.
- 1.2. The statement puts forward the opinions of PWA Planning and Seddon Homes whilst also retaining a focus on a proposed development site, under the control of Seddon Homes on land located to the east of Garstang Road, Bilsborrow.
- 1.3. The Local Plan has been submitted by the Three Central Lancashire Authorities and is due to be subject to examination on the week commencing the 1<sup>st</sup> of December 2025. In advance of this, relevant parties have been invited to provide comments on the aforementioned matters, issues and questions. This Statement draws upon the information provided in the Inspectors' Hearing Programme and Examination Guidance Note and specifically responds to those issues set out in relation to:
  - Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process;
  - Matter 3 – The Housing Requirement;
  - Matter 4 – Strategic Sites and Mixed Use Allocations;
  - Matter 5 - Housing Allocations;
  - Matter 6 - Housing Land Supply; and
  - Matter 7 - Housing Policies
- 1.4. The matters addressed herein will demonstrate that our previous representations remain relevant to the examination of the Central Lancashire Local Plan in that:
  - The LPAs are failing in their duty to deliver sufficient housing site allocations;
  - The allocation of housing within Preston is spatially flawed and unjustified;
  - Inadequate provision has been made for the appropriate expansion of rural settlements; and

- Policies governing the rural areas offer an excessive and unparalleled level of protection.

## /2 THE SITE

- 2.1. As noted Seddon Homes' continued involvement in the Local Plan process is not only due to their status as an established major housebuilder, but also due to the promotion of a site under their control.
- 2.2. The site in question is located to the east of Garstang Road (A6) and immediately to the south of the settlement of Bilsborrow, Preston. The site is made up of agricultural land, constituting three individual fields in total. The site area covers approximately 6.88 hectares, of which 3.07ha will be occupied by the proposed residential development.
- 2.3. A location plan showing the site within its wider setting is provided with the supporting documents (drawing no. 8992-L-04) and for an aerial image of the site within its closer setting please see Figure 1 below:



**Figure 1:** Aerial Image of the site (Source: Google Earth (not to scale)).

- 2.4. The site was subject to two recent applications for residential development under application references 06/2020/1087 and 06/2019/1244, which sought permission for 100 and 105 homes respectively. The former was a resubmission of the initial application, with modifications which looked to respond to the previous application which was refused on the 7<sup>th</sup> of February 2020. However this application was also refused, on the 11<sup>th</sup> of January 2021. The rationale for refusal was based upon the site's location outside of the settlement, within the open countryside, as well as the landscape impact it was perceived to induce.
- 2.5. The applicant continues to contend that the application ought to have been approved and that the above reasons are not representative of the development's impact or how it would be read in the context of the local and wider landscape. For this reason Seddon Homes continue to promote the site as part of the Local Plan process.
- 2.6. It should be noted that since the refusal of the above referenced applications, other residential development has continued to come forward in the locality. This is namely within Wyre, given the settlement of Bilsborrow lies within the Council area. However the consents further evidence the progression of development toward the Seddon site and therefore the clear need to make further local housing provision. The below includes a list of some of the relevant consents:
- Duncombe House ref:22/00122/out;
  - Bacchus Fold ref:19/00677/FUL and
  - Anderton Fold fields ref: 23/00716/FUL.
- 2.7. Whilst the form of development has scope for variation, it is worth noting that as part of the aforementioned submissions that an indicative masterplan for the site was produced. An extract of this plan is included below in Figure 2.



**Figure 2:** Extract of Indicative Masterplan from planning application ref 06/2020/1087 detailing 100 houses on the site

### **/3 CENTRAL LANCASHIRE LOCAL PLAN – MATTERS, ISSUES AND QUESTIONS**

3.1 As part of the examination process, we have reviewed the submission version of the Local Plan as well as the Matters, Issues and Questions laid out by the Inspector. In relation to this, Seddon Homes consider that additional allocations in Preston City Council should be welcomed to secure the soundness of the plan.

3.2 The following paragraphs relate to the Matters, Issues and Questions, which have been deemed relevant to both Seddon Homes and the site they're promoting. For ease it is suggested that this Hearing Statement is read in conjunction with the previous reps made by Seddon Homes.

#### Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

3.3 This Statement seeks to respond solely to matters relating to the Preston City Council area and does not seek to engage with the matters pertaining to South Ribble Borough Council and Chorley Borough Council.

3.4 In this regard Policies SS1 and SS1 do not set out a distribution of development that is inconsistent with the Vision and Objectives of the Plan nor the hierarchy set out in Table 1. However, that is not to say that these elements generate an appropriate growth strategy. In reality the point isn't necessarily about consistency but rather appropriateness. The Inspector has pointed toward needing clarity on this matter with the inclusion of the following questions within section 2.1 which are as follows:

*"c) Is the focus on the larger urban settlements justified and soundly based?*

*d) How were the proportions of development proposed for each settlement arrived at?*

*e) Would it provide sufficient development within rural areas and other settlements?"*

3.5 It is the view of Seddon Homes that these matters should be central to the examination of the plan, given that, within the Preston area, the Plan fails to deliver an appropriate spread of development.

- 3.6 The Plan as submitted does not respond sufficiently to the demand to deliver development within the areas of rural Preston. The housebuilder market has long since acknowledged demand in these areas, and the Local Plan process offered a significant opportunity to plan for the appropriate expansion of settlements such as Broughton, Barton, Goosnargh and the general A6 Corridor.
- 3.7 It is considered that this opportunity has been missed, with insufficient allocations made to ensure growth, both planned and organic, can be delivered across the life of the Plan. The current Central Lancashire Core Strategy (CS) remains an adopted document that sits centrally within the Development Plan. The CS states a strategic objective of the Plan is to significantly increase affordable and specialist housing in rural areas, given they were acknowledged as being the locations in most need of such expansion. The Housing Need and Demand Assessment 2022 undertaken on behalf of Preston City Council by consultancy Arc4, continues this theme, evidencing that Preston Rural East and North has a significantly higher level of owner occupied housing (87.7% and 88%), when compared to central Preston, which less than half that at 43.2%. This is consistent with the general household characteristics shown in report, which note that higher income groups are more prominent in rural areas, as are families and older groups. In situations such as this, it becomes increasingly difficult, without the introduction of substantial new housing stock for anyone, other than the higher income groups, to move or remain within the rural settlements. Again the report notes, with direct regard to affordable housing, that the such units represent between 2-3% of homes in the rural area, notably less than the 21% noted in central Preston and the 32.3% found in east Preston.
- 3.8 The lack of ability for median and lower income people to reside in these areas is a fundamental issue that requires addressing and the fact the Plan fails to do so is a sufficient enough omission as to rendered the Plan unsound. The aforementioned report notes as follows, regarding the purchase of homes in Preston:

*"For buying an entry-level/lower quartile property, the minimum income required was £38,571. The ratio of lower quartile income to price across the City of Preston was 5.4x and for median income to median price it was 5.9x. Both ratios are above the benchmark of 3.5x income and ratio. Ratios are much higher in some urban and rural areas and without substantial deposits the ability to buy is a challenge to many households."*

- 3.9 Whilst the above relates to all of Preston, the issue is that, within the Plan, efforts are being made within the urban area to address housing stock, which in turn will have positive impacts on affordability. Without a comparable focus on rural settlements, home ownership for most will not be a feasible prospect, meaning the Plan has failed to deliver positively prepared housing policies and as such cannot be found sound.
- 3.10 Anecdotal knowledge of these areas shows there to be issues with young people being unable to remain in the villages/areas they grew up in, due to being priced out of buying homes. It is evident that without a more expansive level of growth such settlements will no longer be places that suitably provide for residents of Preston from all economic backgrounds. This is not consistent with the NPPF, which as the Inspector notes (Section 2.5), requires the promotion of sustainable development in rural areas. The Plan as it stands does not do this, further rural allocations are needed and the settlement boundaries should be revisited to allow for such growth in a controlled manner. This would include instances, like the site promoted by Seddon Homes, whereby consideration on rural development should extend to assisting the considered expansion of settlements outside of the Preston City Council boundary.
- 3.11 On this basis, the LPA are considered to have failed to provide sufficient development in more rural areas, as asked by the Inspector in section 2.1 part (e) and section 2.5.
- 3.12 A contributing factor to this is that excessive focus on meeting housing allocations through the expansion of the North West Preston Strategic Location (SS3) and by establishing the new strategic location – Preston West (SS5). Whilst the general idea of larger scale focused growth is not without merits, the use of it in this instance is of a scale that does not represent sustainable development. Development in this location should be more phased in its allocation, with the use of a safeguarding allocation, in part, being more appropriate. The scale of the adjoining allocations is not conducive to ensuring consistent levels of development. The number of different developments that could hypothetically come forward concurrently, would not only result in a situation where housing delivery is at a rate that outpaces the delivery of associated highway and community infrastructure. But also risk creating a situation whereby the location becomes unappealing to developers and landowners, given the quantity of development sites would be of considerable detriment to sales rates and land values.

3.13 A more considered approach would be a reduced allocation, and incorporation of safeguarded allocations across some areas. This would permit for a retained focus of development in this location, without the risk of saturation. Any loss in housing numbers, could then be met through further allocations within more rural settlements as detailed in the proceeding paragraphs. As it stands, within Preston, the Plan fails to justify the excessive focus on urban settlements and we agree that this is a question that should be put to the LPAs.

## **/4 SOUNDNESS AND NECESSARY AMENDS**

- 4.1 As The preceding section points toward there still being a fundamental failure of the Central Lancashire Local Plan to accommodate for a suitable spatial spread of growth, namely across the rural Preston wider area.
- 4.2 It is clear that the existing approach from the Councils toward housing delivery is not appropriately justified nor effective, and in this respect it is clear that the Plan is not compliant with the considerations set out at paragraph 16 of the NPPF and cannot be considered sound in its current form.
- 4.3 It is considered that the Plan does not evident sufficiently how rural housing needs were sufficiently assessed and equally how they have been accommodated within the Plan. Rather than accommodate for necessary rural growth, the LPAs have developed an open countryside policy which affords out of settlement locations protection far in excess that is necessary and beyond that granted to national designations like Green Belt. This should never be the case. The evidence that allocations in Preston need revisiting is most evident when examining the reliance the LPA have on the North West and West Preston strategic locations, where the majority of the area's new housing is focused.
- 4.4 In view of the above it is suggested the following should occur prior to adoption:
- The Local Plan should secure a housing delivery that extends to the full requirement of the identified housing requirement;
  - Further assessment as to housing needs of rural settlements;
  - Additional review of all settlement boundaries;
  - Further allocation of residential development adjacent to smaller settlements away from the Preston urban area;
  - Reconsideration of the extent and phasing of the proposed extension to the North West Preston Strategic Area (SS3) and West Preston Strategic Area (SS5), with an emphasis on making safeguarding land allocations;
  - Revision of the policy wording to policy EN17 to be more accommodating of larger scale development (beyond that allowed by HS8), where shown to be necessary; and

- Reduction of the extent of the Area of Separation (EN18) allocation between Barton and Bilsborrow to allow for suitable and necessary sustainable growth.

## **/5 CONCLUSIONS**

- 5.1 This Hearing Statement has demonstrated that, in its current form, the Central Lancashire Local Plan does not provide a sound or justified strategy for the distribution of housing growth within Preston, particularly in respect of the rural settlements north of the city. The excessive focus on the strategic allocations at North West Preston (SS3) and West Preston (SS5) risks undermining housing delivery, infrastructure capacity, and market diversity over the plan period. Conversely, rural areas such as Bilsborrow, Barton, and the wider A6 corridor have been unduly constrained, with insufficient allocations made to reflect local housing needs or support sustainable village growth.
- 5.2 Seddon Homes maintain that the Local Plan should adopt a more balanced approach to spatial distribution—one that recognises the contribution smaller, well-located rural sites can make to meeting both market and affordable housing needs. The site promoted by Seddon Homes, at land east of Garstang Road, Bilsborrow, represents a sustainable, deliverable, and logical extension to the existing settlement that could help address this shortfall.
- 5.1 Subject to the above modifications, the Plan would be better placed to deliver sustainable growth across all parts of Central Lancashire, consistent with the objectives of the National Planning Policy Framework and the vision for an inclusive and prosperous sub-region.



2 Lockside Office Park  
Lockside Road  
Preston  
PR2 2YS

01772 369 669

[www.pwaplanning.co.uk](http://www.pwaplanning.co.uk)