

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

Hearing Statement

**REPRESENTATIONS ON CENTRAL LANCASHIRE'S LOCAL PLAN
EXAMINATION**

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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 1st 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 7th of February 2020. However this application was also refused, on the 11th 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 4 – Strategic Sites and Mixed Use Allocations

- 3.3 Previous paragraphs of this Statement have drawn concern in relation to the Strategic Sites SS3 – North West Preston/Bartle and SS5 – Preston West. This section seeks to reaffirm those apprehensions and expand upon them.

SS3 – North West Preston/Bartle

- 3.4 The allocation represents an extension of the current MD2 allocation in Preston Local Plan. The 63.39ha extension is expected to deliver 2,767 dwellings over the course of the plan.
- 3.5 The theme of this Hearing Statement is clearly to progress the position that the LPA has failed to give due weight to the need to focus more development in the rural settlements of Preston. The scale and capacity of this expansion presents an unnecessary and excessive focus on the Preston urban area. The infrastructure that was promoted to come forward in the existing North West Preston Strategic Area is still lacking, with no progression on any school provision, a lack of local centre, and despite numerous completed developments no substantive progress has been made on the linear park. Consequently, a phased approach, which gives infrastructure chance to catch up with housing delivery should be promoted.
- 3.6 Moreover, in progressing with this allocation there is a real risk of housebuilder fatigue, whereby the values and sales rates become lower and unattractive due to the over concentration of development sites. This would be particularly problematic given the Plan

only seeks to deliver 80% of standard method housing requirement and any dip in housing delivery could have considerable implications on the LPAs ability to continue to evidence a sound supply of housing. This in itself is adequate justification to move away from the allocation as currently defined, in favour of a smaller allocation with further allocations around rural settlements considered. The logical progression for a revised allocation would be to allocate the area of land that already benefits from consent, under the Bartle Village application, whilst establishing a safeguarding land allocation on the remaining land.

SS5 – West Preston

- 3.7 A similar theme of commentary is also applied to the SS5 allocation. The allocation need not be the size that it is given that a vast majority of the proposed dwellings (75%), are proposed to come forward after the life of Plan, where the planning pressures could be significantly different.
- 3.8 The policy talks about the mixture of uses, which is welcomed, as well as the need to masterplan the allocation. However with such a large timeline for development, it will be unlikely any such masterplanning will be anything other than a premature exercise that will likely change after the life of this Plan. The text suggests that 450 dwellings will come forward during the Plan period with a further 1,400 after. Given the nature of the split of development, it would make sense to allocate a specific area for the aforementioned 450 dwellings, which best ties in with existing infrastructure and then safeguarded a large area for future delivery. This would then enable the detailed masterplanning of the employment uses, without delaying their ability to come forward in isolation.
- 3.9 In short the allocation of this as one Strategic Location, undermines the ability to deliver in full on its development credentials. A smaller residential allocation/s to cover the dwellings delivered during the Plan period, alongside an employment allocation and a safeguarded land designation would result in a more deliverable and easy to monitor outcome and generally a better example of land use planning.
- 3.10 The above paragraphs detail how we feel the strategic sites in Preston have in some part failed to deliver an appropriate cross section of development sites. This is of particular relevance to the questions also posed under Matter 5, specifically sections 5.7-5.9. in reviewing these questions, it is unsurprisingly the view of Seddon Homes that the site allocations in Preston do not provide an adequate range of sites, concerning both scale and location. The performance of North West Preston thus far casts doubt of the delivery of

social infrastructure, whereas the scale of the allocations (SS3 and SS5) bring into question the deliverability of the dwellings over a sustained period.

- 3.11 As noted the allocations should be reduced in size, with areas removed from the allocations designated as safeguarded land. The further residential allocations should be made in rural areas of Preston, where allocations are lacking, on the periphery of existing settlements which the necessary infrastructure is already in place. An example of this would be Seddon Homes' site on the edge of Bilborrow.

/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.



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