

# 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

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## 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 7 - Housing Policies

3.3 This matter in its more general sense looks to establish if the Local Plan contains positively prepared housing policies that are sufficient and consistent with the NPPF.

3.4 The comment in this section will respond directly to those matter laid out in the Inspectors Hearing Programme, but additionally will seek to refer to other policy matters, related to the provision of housing that are thought to require further scrutiny.

3.5 In relation to Policy HS6, Seddon Homes' are content that the policy provides an effective framework supporting the delivery of housing over the Plan period. Specifically it is welcomed that the density requirements provide a figure for locations outside of settlement boundaries. This suggests that the LPAs are aware the development in such locations will be needed and are seeking to make provision for it.

3.6 An additional manner in which the Plan points toward development outside of settlement boundaries is through the rural exception site policy HS8. Whilst the spirit of this policy is positive and promotes development, it will only truly be effective following a full review and modification of rural settlement boundaries. The policy includes a provision which requires applicants to ensure first that there are no sites within the settlement boundary that could accommodate for development. The reality, within Preston at least, is that the existing settlement boundaries do not permit for any relative growth. Hence under the Plan, as it reads currently, no expansion beyond that permitted by HS8 would be permissible. This is

not sustainable, as the pressure for rural settlement growth is considerable and failure to accommodate for it at this stage, will only result in necessary concessions in the future for larger scale, out of settlement, rural development. Such developments would undermine the restrictions laid out in Policy HS8 and hence if the policy is to be readily enforced, the Plan as a starting point should accommodate for more rural growth. Preferably through the use of further housing allocations.

- 3.7 In such instances that further allocations are made, the site promoted by Seddon Homes' would represent a suitable and deliverable allocation. However it currently resides within what is to be allocated as Open Countryside and within an Area of Separation, as such policies EN17 and EN18 apply respectively.
- 3.8 Policy EN17 Development in the Open Countryside - is a highly restrictive countryside policy that significantly limits the scope for new development outside settlement boundaries. The general presumption is against development unless it falls within a narrow set of exceptions, such as rural exception housing, rural worker dwellings, conversions, essential infrastructure, or agriculture/forestry-related schemes.
- 3.9 NPPF 2024 does not require the countryside to be protected for its own sake, but policy EN17 still applies a high level of protection without distinguishing between designated valued landscapes (which deserve stronger protection) and general countryside areas, which can accommodate sustainable development. In this regard, policy EN17 applies an approach that is more restrictive than national Green Belt policy, which is excessive.
- 3.10 Policy EN17 states that all proposals must not "*have a harmful effect on the character of the countryside*" which imposes a highly subjective test and is too rigid potentially blocking appropriate and well-designed development. The NPPF supports the protection of the countryside for its intrinsic character and beauty, and promotes sustainable patterns of development. However, it also encourages rural communities to thrive and grow.
- 3.11 In summary, policy EN17 is notably restrictive in scope, with a strong emphasis on landscape protection and a presumption against development outside settlement boundaries unless narrowly defined exceptions apply. While this does reflect the protective aims of the NPPF, it risks being inflexible and inconsistent with the NPPF's broader support

for sustainable rural growth, reuse of buildings, and rural housing to maintain community vitality.

- 3.12 It was noted in previous submissions that the introduction of an Area of Separation (Policy EN18) covering most of the gap between Bilsborrow and Barton is a surprising inclusion and one which in general is not considered necessary or certainly not in its current extent.
- 3.13 Barton is a linear settlement, and the same is true of Bilsborrow, hence in a situation which the settlement is subject to minor expansion, it is likely to be directly south or north of the existing settlement and the policies in this plan should accommodate for that. Indeed the allocation does achieve this with regard to Barton, given a large swathe of land north of the settlement, between the car centre (adjacent to the junction with White Horse Lane) and Green Lane, is both outside of the settlement boundary and not included within the area of separation. However no such provision is afforded to Bilsborrow. Whilst it is of course noted that Bilsborrow is a settlement within a different authority, its boundary does abut Preston City Council and therefore clearly the best way for the Local Plan to aid in managing the growth of Bilsborrow is to offset the proposed area of separation from the boundary with the settlement, in a comparable nature to that done with Barton. In this instance we believe such a revision should result in the site promoted by Seddon Homes being
- 3.14 A revised designation would likely bolster the weight attributed to Policy EN18 in the determination of planning applications, given they would be allowing for a relative level of growth whilst understandably protecting against the merging of settlements. The policy is clear that development can still be permitted provided it does not undermine the spaces between settlements and the character of the countryside and local settlements. Seddon Homes are of the position that a development on the land in question could be achieved without compromising the aforementioned receptors. Consequently if a development of the scale previously proposed could be approved within such designation, it again suggests the extent of the allocation is excessive and should be limited to land which clearly is more sensitive to development and valuable as a strategic gap. Placing the Local Authority in a position whereby they consent to major development within an area of separation would undermine all similar allocations and as such it is vital the extent of them is well considered and defensible.
- 3.15 There is not an objection to the principle of including such an designation, however as noted in the preceding paragraphs the extent of the allocation is not proportionate to its purpose.

To avoid a situation where the settlements merge or even appear close to coalescing, a reduced area of separation would be more than adequate and would not inhibit appropriate growth, thus ensuring the policy has been positively prepared and can be considered sound.

- 3.16 In short the housing policies detailed within the submitted Plan, as a collective, do not represent a justified, effective and consistent approach. Rather the policies are at odds with the NPPF and within Preston for an unbalanced provision of housing development.

## **/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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