2nd November 2023

**Appeal by: Hollins Strategic Land**

**Land west of Garstang Road,Broughton,Preston,PR3 5JA**

Dear Mr Evans,

With reference to the above Appeal the Parish Council wishes to speak at the appeal and continues to object on the following grounds:

* The site was not designated in the Broughton Neighbourhood Plan or within the current Central Lancashire Core Strategy

The BNDP was adopted by Preston City Council in December 2018 and designated three sites within the parish for development. (8.5 RES1) These were in addition to the sites already designated under the North West Preston Development Area and those with existing planning permission.

The sites designated in the plan were agreed following work by JBA commissioned by BPC to look at all possible sites within the parish.

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| --- | --- | --- |
| **Sites reviewed**  | **JBA code** | **JBA assessment** |
| Former Football Pitch | G | 1= |
| Former football pitch and land to the rear of Broughton club | H | 1= |
| No 522 Garstang Road | B | 2 |
| Land to the rear of Broughton club | E | 3 |
| Helms Farm | A | 4 |
| Land to the rear of Broughton social club (extended site) | F | 5 |
| Land south of Whittingham Lane | C | 6 |
| Field west of Garstang Road | K | 7= |
| Sandy-gate Lane | L | 7= |
| Land north of Old Hall farm | M | 8= |
| Land south of Dobson’s farm | D | 8= |
| Keyfold farm | J | 9 |

This included the site that is the subject of this appeal K. This report is attached to this letter: - Broughton-in-Amounderness Neighbourhood Plan: Landscape/visual appraisal of small-scale housing sites

\*Currently the BNDP review group are reviewing the adopted plan as it does not have a design code (highlighted by the “call in” over the site for a Mosque last August), there are some conflicting statement & two of the sites allocated have been developed.

The review group have commissioned JBA to update the SEA and Secom to produce a design code. The review group have not asked JBA to complete another site assessment as the Central Lancashire Group is in the process of doing this for the new plan which has been delayed by covid and other factors but now due to report imminently

The BNDP has prevented development in non-designated areas since the plan was adopted except for the site on Whittingham Lane C. This was granted planning permission as the access road and 1/3rd of the site were within the Parish boundary. The adjacent site to the south had planning permission denied.

Even with the BNDP dwelling numbers within the parish have doubled.

The current sites behind the proposed development accessed off Sandy-gate Lane and the site the other side of Garstang Road at Keyfold Farm were subject to an appeal in February 2018. At that time Preston City Council could not demonstrate a 5year land supply (which they now can) and the BNDP was out for consultation so was not given any weight in the Inspectors deliberations and they were allowed.

***This site should not be developed as it is not designated within the BNDP and is not a small scale development***

* The site is within the current & proposed “area of separation” and is open countryside

Under Policy EN4 any development within Areas of Separation has to be assessed in terms of any harm to the effectiveness of the gap between settlements (e.g. that between Broughton and Preston’s Urban Area) and whether such harm would compromise the function of the Area of Separation in protecting the identity and distinctiveness of settlements.

Preston does not have any “green belt” designated sites instead it uses “Areas of Separation (As)” between the rural and urban areas. This site is within the current Central Lancashire Core Strategy and the documents submitted to the CLLP state it should be retained.

<https://centrallocalplan.lancashire.gov.uk/media/1180/green-belt-designations-study-main-report.pdf>

The Open Land Assessment Study (October 2022) divides the land into parcels and then assesses them N5-N12, N14-N20 & N27 are the groupings for the rural parishes. N6, 7, 9, 14, 18 & 19 are seen as having a high significance to “checking the unrestricted sprawl of large built-up areas”. These are the areas in the south that abut the Motorways and main highways east. N6, 14, 27 & 20 are seen as making a moderate contribution to stopping neighbourhoods merging and M18 & 19 having a significant contribution. (Haighton & Grimsagh)

Preston local plan policy EN1 “Housing development within Open Countryside” states that development is restricted to:-

* The re-use or re-habitation of existing buildings
* Infilling within groups of buildings in smaller retail settlements (not identified as a village)
* Rural Exception Affordable Housing Developments adjoining village settlement boundaries where need for such housing has been established by a comprehensive needs assessment for the local area.

Rural Workers dwellings where there is a functional need for workers to live near their place of work and no suitable existing accommodation and subject to other criteria

***This site should not be developed as it is within the designated Area of Separation and is a Greenfield site contrary to the planning policy of PCC & BNDP***

* The site is within view of the Grade 2 listed properties/sites at Bank Hall and the Village War Memorial

The BNDP sets out to protect the listed heritage assets in the Village and their environment.

Section 11 concentrates on the “Built Environment & Heritage” and includes both the national listed properties of which both the memorial and bank hall are and a local list. Secom looked at heritage assets stressing the need to preserve their historic environment.

BNDP 11.4 policy HE states that “The heritage assets identified in the Heritage Register in this plan and any subsequent reviews shall be protected in accordance with policies EN8 and EN9 in the Preston Local Plan and national guidance.

*CLCS Policy 16: Heritage Assets* states that:

“The policy sets out to protect and seek opportunities to enhance the historic environment, heritage assets and their settings by safeguarding heritage assets from inappropriate development, supporting development or other initiatives where they protect and enhance the local character, management and historic significance of heritage assets and identifying and adopting a local list of heritage assets”

***This development should not be allowed as it will be directly in front of Bank Hall and just to the north of the war memorial casing a direct impact on the setting of both of these grad 2 listed sites***

* The site exits onto the Garstang Road crossing the Guild Wheel/ Garstang Road cycle track onto the road

In October 2018 the bypass around Broughton was opened, the Garstang Road was narrowed, two speed humps were installed by the primary school, a 20mph local speed limit implemented, parking restrictions implemented and the crossroads traffic lights removed. The desired effect of reducing traffic was partly met but the speed limit is not adhered to, the crossroads has been the scene of many accidents and pavement parking has increased.

The PC has installed a SPID just to the south of this site and has data that shows average speeds well over the permitted 20mph and higher than expected (90% reduction predicted by LCC post bypass) traffic numbers.

This development will have several effects:

1. It crosses the cycle lane of the Guild wheel: the BNDP policy A12states that “Proposals that would be to the detriment of the safety, amenity and enjoyment of users potentially reducing the numbers using this facility will not be permitted”. The access is directly across the cycle lane and as such will make the use of the cycle lane dangerous.
2. It will increase traffic onto the Garstang Road already more than the numbers predicted by LCC

***This site should not be developed as it will exacerbate the issues with speeding in a supposedly 20mph speed area, cross the well use cycle lane and increase the traffic onto the Garstang Road.***

* There has been no Community involvement or discussion

In 2018/9 the Parish Council in response to the Parish Action Plan, which is made up of the Parish Action Points form the BNDP, highlighted a need to increase open spaces, increase off street parking and develop a community facility.

The PC looked a number of sites and buildings and approached local landowners for sites. The owners of this site were approached but stated they were going to apply for development. It should be noted that the identified site to the north east of the crossroads never responded but the site behind the existing development at Keyfold Farm did. The work with this developer will include a new park, allotments, a scout hut and additional land for the primary school to expand onto. Separately the PC is working with PCC to improve and extend the existing park, improve the playground and enhance the park with setting and footpaths.

Earlier this year the agent for this site sent a FOI request to the PC for information relating to how the BNDP review group were going to allocate sites. This was responded to within the agreed timescales. The agent then requested a F2F meeting when the approach to the allocation of sites as set out \* in the started paragraph at the beginning of this letter.

***This site was not consulted on, will not meet any of the PAP’s form the BNDP and will only exacerbate the issues with parking and traffic in the village***

It should be noted that this is a reapplication of the one turned down in 2022 and there should be a copy of the objections sent then available: 06/2021/1104.

The Cllrs look forward to meeting you at the appeal next February. If you need any further details do not hesitate to contact me.

Yours sincerely

Angela Nicholls

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