

Barton Parish Council

c/o 87 Forest Grove

Barton

Preston

PR3 5AY

24 July 2019

FAO: Jonathan Evans, Preston City Council Planning Department

Outline planning permission for up to 151no. dwellings and a community building with associated works (access applied for only) has been submitted by Wainhomes on land at Cardwell Farm, Garstang Road, Preston, Barton, PR3 5DR.

Barton Parish Council would like to submit an objection to this planning application (planning reference number 06/2019/0752).

Whilst there is an extant permission for development on a portion of the site (Phase 1), permission has only been granted by virtue of access through Woodlands Way. This proposed new scheme seeks permission for access off the A6 and as such should be considered as a new application and on its own merits.

Our objection is based on the following:

Highways, Traffic and Road Safety Issues

Barton Parish Council continue to work closely with Lancashire County Council (LCC) to develop a strategy for the A6 to make the road safer for all users and to recognise the increase in the volume of traffic that the proposed significant housing developments in Barton, Broughton and Catterall are bringing along the A6.

LCC have acknowledged that the funding is not available at present to deliver the strategy needed to ensure the A6 has the capacity to support proposed development, and is appropriately furnished to cope with the increase in traffic. With Wyre Council not registered for CIL, this means that as Catterall and Bilsborrow both see increases in housing, no contribution is made to LCC towards improvements to the highway. This in turn places additional pressure on both Barton Parish Council and Broughton Parish Council to raise precepts and additional funding to provide the infrastructure required to cope with the additional traffic along the A6 corridor. The ability to raise this funding at Parish level is not considered possible or sustainable long term.

Access to the site is off an existing busy road and we question whether the proposed junction is suitable for the volume of traffic expected.

We note the lack of response from LCC Highways to the previous application for outline permission for 55 dwellings with access shown and subsequently approved off Woodlands Way. As this application is now a major application for 151no dwellings with a proposed

new access off the A6, we would expect a full written response from LCC Highways and reserve the right to comment again once these have been received and uploaded to the application file.

Unsustainable Location

The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites and lead to an unplanned and inappropriate expansion of a rural village which, by reason of its low accessibility to local employment areas, shops and services, would fail to achieve the social and environmental dimensions of sustainable development.

The proposal would fail to focus development at an appropriate location contrary to Policy 1 of the Central Lancashire Core Strategy (2012), Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) (2015) and the National Planning Policy Framework.

The Preston Local Plan 2012-2016 does not allocate any sites for housing development in rural areas, either within or adjacent to the villages listed in paragraph 4.25, which includes Barton. The Preston Local Plan at paragraph 4.25 notes that Barton is a village which is not identified in the Central Lancashire Core Strategy as a Rural Local Service Centre and therefore there are no significant growth aspirations for it. **To allocate sites for housing in Barton would contradict the settlement hierarchy** established in the central core strategy, which states that development in villages will be typically small scale. This development is clearly not small scale.

This proposal fails to focus development in an appropriate location and is contrary to Policy 1 of the Central Lancashire Core Strategy which suggests that growth and investment be concentrated in the northern suburbs of Preston focussing on local centres. Paragraph 4.27 of the Preston Local Plan comments on CS Policy 1(f) stating: "Limiting the scale of development within these villages serves to abide by the principles of sustainable development. Central Lancashire Core Strategy Policy 1 establishes a hierarchy of settlements within the Central Lancashire area based on size, accessibility, and range of services available. Villages appear at the bottom of this hierarchy as they are often small, are not situated in the most sustainable locations and cannot offer a wide range of services to residents."

Both the Core Strategy and Preston Local Policy accept that locations which fall under Policy 1(f) have limited services and are not the most sustainable locations for development.

The proposed development is not small scale in the context of the neighbouring Barton village, as it would deliver up to 151no. Residential units adjacent to the existing village, nor would it constitute redevelopment, conversion or development that meets a local need. Therefore, the proposed development is contrary to CS Policy 1.

The scheme is clearly contrary to Policy and should be considered unsustainable development.

Consideration against the NPPF and Sustainable Development

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development is broadly defined in the Framework as having three dimensions; namely economic, social and environmental. Our comments in relation to these dimensions are as follows:

Economic

Whilst the proposal will increase housing land supply north of Preston, we do not consider this to be a positive benefit. The level of building in this area is unprecedented and unrequired. What would benefit the area economically is the provision of additional services to support the growing parish of Barton. We fail to see the benefits of this proposed development to the local economy. Wainhomes have provided no additional information that they support the employment of local contractors or support the employment of local people and apprentices and as we have seen, developments cause disruption including recent issues in Barton with road surfacing and sewerage.

Social

The proposal results in the creation of further development beyond the existing village boundary on an agricultural field. There are extremely limited services in Barton with all other services in nearby villages beyond an acceptable walking distance. The proposal offers no new services nor provision for anything new, and with an already increased number of housing in the area (following recent decisions to grant housing in the Parish) this proposal offers no social benefits. This site is yet another example of a poorly located site for housing in an already saturated area of north Preston.

Environmental

The site is not subject to any statutory ecological designations, Tree Preservation Orders or Heritage assets, and it is not within an area at risk of flooding as defined by the Environment Agency. Very little if any suggestion of any mitigation measures to protect and enhance the site or any habitats on it have been made.

As yet comments do not appear to have been submitted by the Council's Ecologist and therefore we reserve the right to comment again once these have been received.

We would also like to make reference to planning application number **06/2018/1297 - Outline application for up to 95no. dwellings with access off Garstang Road (access only)**

This application was refused for the following reason,

1. The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites and would lead to an unplanned and inappropriate expansion of a rural village. The proposal would therefore fail to focus development at an appropriate location contrary to Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies, Policy RES1 of the Broughton Neighbourhood Development Plan 2016-2026 and the National Planning Policy Framework.

The Parish Council would urge the Council to refuse this application for the same reason. The Case Officer assessed the scheme against the NPPF and noted as follows,

"The Framework provides the purpose of the planning system is to contribute to the achievement of sustainable development and that achieving sustainable development means the planning system has three overarching objectives: the 'economic objective', the 'social objective', and the 'environmental objective'. However the Framework further provides that these objectives should be delivered through the preparation and implementation of plans and the application of policies in the Framework; they are not criteria against which every decision can or should be judged....."

.....So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 11 of the Framework sets out a 'presumption in favour of sustainable development' and for decision taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless: i) The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole....."

....Whilst the local circumstances of the site's accessibility have been taken into consideration, those circumstances alone are not sufficient to allow development that conflicts with the development plan, including the neighbourhood plan, that meets the criteria set out in Paragraph 14 of the Framework. Such conflict significantly and demonstrably outweighs the benefits, as provided for by Paragraph 14 and Paragraph 11d)ii) of the Framework. If planning permission was granted the proposed development would lead to an unplanned and inappropriate expansion of a rural village contrary to Policy 1 of the Core Strategy, Policy EN1 of the Local Plan and Policy RES1 of the BNDP. It is considered that the adverse impacts of allowing the development contrary to policies contained within the development plan significantly and demonstrably outweigh the benefits of the scheme. As such, and in accordance with Paragraph 11d)ii) of the Framework, the proposal is recommended for refusal."

Conclusion

The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites and lead to an unplanned and inappropriate expansion of a rural village which by reason of its low accessibility to local employment areas, shops and services, would fail to achieve the social and environmental dimensions of sustainable development.

The proposed development would also lead to the substantial loss of a tract of open countryside outside the defined settlement boundary for Barton village, creating a sprawl of development into the countryside away from the main built-up village which would

significantly detract from the rural character of the village and the surrounding rural landscape. The proposal would therefore fail to focus development at an appropriate location contrary to Policy 1 of the Central Lancashire Core Strategy (2012), Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) (2015) and the National Planning Policy Framework, as well as being contrary to Policies 13 and 21 of the Central Lancashire Core Strategy (2012) and the National Planning Policy Framework.

Lack of infrastructure

Investment in infrastructure in Barton has not increased or improved in line with planning permissions granted in recent years for large housing developments in Barton. Preston City Council and Wyre Council in granting planning permission have not supported the Parish to provide the necessary infrastructure to support the growing village. Whilst it is acknowledged that Barton Parish Council is in receipt of CIL funding, the Parish Council alone with its CIL money and Precept cannot provide the necessary infrastructure going forward to support these housing developments in the volume and timescales in which they progress.

Unacceptable Visual and Landscape Impacts

It is the Parish Council's opinion that the proposed development would lead to the substantial loss of a tract of open countryside outside the defined settlement boundary for Barton Village, creating a major sprawl of development into the countryside away from the main built up village. This development, by virtue of its scale, would significantly detract from the rural character of the village and the surrounding rural landscape to the detriment of the local area. This would be clearly contrary to Policies 13 and 21 of the Central Lancashire Core Strategy (2012) and the NPPF.

Given the significant proposed expansion of housing into the rural area we question why a **Landscape Visual Impact Assessment** has not been carried out and submitted with the application. This is especially concerning given the significant change in topology on the site and the likely visual impact of the scheme on long and short range views of the locality, in particular those from the public right of way that runs close to the site.

Comments provided on previous applications by Preston City Council's own **Parks and Street Scene (Landscape) department**, included the acknowledgement that,

- the site has value in interrupting the suburban ribbon development of Barton, and
- the site has key components of the landscape character of both the Fylde plain and undulating lowland farmland, and
- the proposed access from Garstang Road would interrupt the 'Bowland Fringe' landscape character area where the area between built development is narrow, making it more valuable and vulnerable. The hedgerow along Garstang Road is a typical feature of the A6 in its rural lengths and would be lost whereas the new footpath would have a fence which would give it a hard urban edge. The encroachment of the proposed development at the east boundary of the field would be visually intrusive. The style of development is not in harmony with the distinctiveness of Barton."

We would also draw attention to comments made in the case officer's report on the previous outline application for this site:

Impact on the open countryside

PLP Policy EN1 seeks to protect areas of open countryside from unacceptable development which would harm its open and rural character and limits development to that which is needed for the purposes of agriculture or forestry or other appropriate rural use, the re-use or rehabilitation of existing buildings or infilling within small groups of buildings within smaller rural settlements. The proposed development is not required for any exceptional purposes set out in Policy EN1, nor is it located within the defined boundaries of a small rural settlement or village (aside from a small proportion of the site fronting Garstang Road as indicated above). In this case the proposal would not comply with Policy EN1 of the Adopted Preston Local Plan 2012-26.

Impact on landscape character and visual amenity

CS Policy 13 requires development to conserve and where possible enhance the character and quality of the landscape. CS Policy 21 seeks to ensure that new development is well integrated into existing settlement patterns, appropriate to the landscape type and contributes positively to its conservation or restoration or the creation of appropriate new features. The Framework says that the intrinsic character and beauty of the countryside should be recognised, with the planning system contributing to and enhancing the natural and local environment. It does not seek to protect all countryside from development; rather it concentrates on the protection of "valued" and "distinctive" landscapes, and seeks to encourage development on previously developed land. The term "valued landscape" is not defined, but the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA) (The Landscape Institute & Institute of Environmental Management & Assessment) says that landscapes or their component parts may be valued at the community, local, national or international levels and that they may be valued by stakeholders for a variety of reasons. Value can apply to areas of landscape as a whole, or to individual elements, features and aesthetic or perceptual dimensions. When assessing the value of a landscape, one may take into account such matters as landscape quality (condition), scenic quality, rarity, representativeness, conservation interests, recreation value, perceptual aspects and associations. The Landscape Strategy for Lancashire identifies the site as being at the transition between two Landscape Character Areas, those being Undulating Lowland Farmland (LCA 5h Goosnargh-Whittingham) and Coastal Plain (LCA 15d The Fylde). The Landscape Strategy for Lancashire notes that LCA 15d is characterised by gently undulating, naturally poorly drained farmland and that field size is generally large with hawthorn hedgerows providing the main boundaries. It is described as being relatively open with blocks of woodland and field ponds forming characteristic features with many man-made features such as pylons, communications masts and road traffic (which are highly visible).

Given the findings of previous Landscape Character Assessments, and the significant increase in the scale of the proposed development, the development is considered to cause **moderate**

to major harm to the rural character and appearance of the area and would therefore approval of this scheme would be in **direct conflict with Core Strategy Policies 13 and 21.**

Neighbourhood Plan

The Barton Village Neighbourhood Plan Group are in the process of producing a neighbourhood plan for Barton, contrary to the Planning Statement, and this application is counterproductive to the establishment of a Plan which seeks to provide residents with a voice in the future of their village. The speed and volume in which housing applications are currently being submitted to Preston City Council does not allow sufficient time for the plan to be developed and as such prevents the voice of the community being heard and considered in the determination of planning applications.

Unacceptable increase in housing numbers

Housing numbers in the village will increase by 100% in the next few years if all applications proposed and already approved are realised. As work continues on the Barton Neighbourhood Plan, we wonder whether this hard work and time offered by volunteers will be worthwhile if unplanned and speculative development continues to come forward above that allocated within the current Local Plan.

Lack of Information

Given the application is a Major Development, the Parish Council are concerned that the full suite of documents required by Preston City Council's own Validation Checklist have not been supplied.

Agricultural Land Use Assessment - Both the Phase 1 and Phase 2 assessments are Desk Top Study's only, and they suggest that further survey work is required to determine the definitive Grade of land in question.

We ask that Preston City Council request that the further surveys are carried out for confirmation and clarity of the land, for the avoidance of doubt.

Site Sections - Given the significant changes in topology, we would question whether large portions of the red edged site are actually able to be developed.

We request that Preston City Council request further topographical surveys and site sections of the site to satisfactorily indicate how the site can be developed as shown on the indicative drawings.

Validation Checklist - We note that the following statements required by Preston City Council's validation checklist are also missing from the submission, and request that the application is made invalid until they are provided;

- Utilities Statement/Foul Sewage Assessment
- Affordable Housing Statement

- Statement of Community Involvement (including confirmation that the Neighbourhood Plan group have been contacted)
- Sustainability Assessment

Finally, we as Barton Parish Council on behalf of our community and neighbourhood plan group and our neighbouring parishes appeal to you, our City Council, to put everything behind helping us to ensure that our village is appropriately and sensitively developed. In the case of this proposed development, I'm sure that as the case officer you have visited the site and can clearly see that this is not infill within an existing village settlement boundary. 151 houses on this land does not in any way fit with the character of the landscape and size of our village.

The Parish Council have had many meetings with housing developers in our village over the past few years. Despite many written and well-reasoned suggestions at both pre planning and reserved matters stages, we continue to see inappropriate, ill thought out housing developments that deliver nothing for our village or indeed Preston as a City. As professional planners alongside City Councillors and other professional officers we feel that you have the necessary skills and powers to ensure that any developments that are granted permission leave behind a sustainable legacy for Preston and deliver for the communities within in. Recent planning applications granted for housing developments in the village do not deliver quality, innovation, exemplar features or indeed any positive benefit to the village.

Our Councillors work hard on a voluntary basis to support the needs of our communities and are committed to working hard alongside the City Council to recognise the growing needs of the City but also recognise that our village is not an appropriate location for the scale of development that we are currently seeing. We appeal to you as a City Council to support us in our endeavours and maintain a dialogue with us outlining how we can work together to support each other as essentially when it comes to housing at the moment we feel our frustrations are shared !

If you have any queries regarding any of the above comments please do not hesitate to contact us.

Many thanks

Yours sincerely

Melissa Thorpe

Clerk to Barton Parish Council