

Central Lancashire Local Plan 2023-2041

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
(ENGLAND) REGULATIONS 2012



Regulation 19 Pre-Submission Plan

REPRESENTATION FORM

The easiest way to submit your comments is online at <https://centrallocalplan.citizenspace.com/planning/cllp-regulation-19-representation-period/> . Alternatively, you can scan the QR code on the right, using a smartphone, to be taken to the webpage. **We would encourage you to use the online form wherever possible.** Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



Submission form

This form has two parts-

Part A – Personal Details: need only to be completed once. **We will not be able to accept responses where personal details are not provided.**

Part B – Your representation(s): Please fill in a separate sheet for each representation you wish to make relating to each individual policy.

You will be asked to give details of why you consider the policies of the Local Plan to be sound or unsound, please be as precise as possible. You will also be asked to set out the modification(s) you consider necessary to make the Local Plan policies sound in respect of any soundness matters you have identified. You will need to say why each modification will make the policy sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Privacy Notice

If you have any questions about how the Central Lancashire Authorities will handle your personal data, please see our Data Protection Policy Statement or contact us via email at centrallancashireplan@chorley.gov.uk

- Chorley Privacy Statement: <https://chorley.gov.uk/privacy>
- Preston Privacy Statement: <https://www.preston.gov.uk/article/1231/Data-protection-policy-statement>
- South Ribble Privacy Statement: <https://southribble.gov.uk/privacypolicy>

Part A: Personal Details***We will not be able to accept responses where personal details are not provided.**

1. Please provide your contact details.

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) in the Person Details boxes below but complete the full contact details of the agent in Agent Details.*

	Representor Personal Details	Agents Details (if applicable)
Title		Mr
First Name		Graham
Last Name		Love
Job Title (where relevant)		Director
Organisation (where relevant)	Applethwaite Ltd	S&L Planning Consultants
Address Line 1		Rational House
Address Line 2		32 Winckley Square
Town		Preston
Postcode		PR1 3JJ
Telephone number		01772 965376
Email address		
What authority do you live / work in? (<i>Chorley, Preston, or South Ribble</i>)		n/a

Part B: Please use a separate sheet for each representation you wish to make

Name or Organisation:	Applethwaite Ltd
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3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.
If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

Comment being made against:	Reference (please provide)
Policy:	HS6(1)
Paragraph:	
Development Site:	
Policies Map:	
Evidence:	
Other (Please state):	

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3) Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Central Lancashire Local Plan does not comply with).

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to attached letter and enclosures

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to attached letter and enclosures

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

Part B: Please use a separate sheet for each representation you wish to make

Name or Organisation: Applethwaite Ltd

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If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

Comment being made against:	Reference (please provide)
Policy:	HS2
Paragraph:	
Development Site:	Omission of land east and west of Whittle-le-Woods, Chorley
Policies Map:	
Evidence:	
Other (Please state):	

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Please refer to attached letter and enclosures

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Please refer to attached letter and enclosures

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	Please check the relevant box
No, I do not wish to participate in hearing sessions	<input type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The representations raise matters that our client wishes to present to the Inspector

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Third Floor, Town Hall, Lancaster Road, Preston, PR1 2RL by filling in this representation form.

Forms must be received by midnight on Monday 14 April 2025.



14th April 2025

Central Lancashire Local Plan Team
Regulation 19 Consultation
3rd Floor Town Hall
Lancaster Road
Preston PR1 2RL

By email: centrallancashireplan@chorley.gov.uk



Our ref: APPL119

Dear Sir or Madam,

**REPRESENTATIONS BY APPLETHWAITE LTD
CENTRAL LANCASHIRE LOCAL PLAN 2023 - 2041 REGULATION 19 CONSULTATION**

These representations are submitted on behalf of our client Applethwaite Ltd ["Applethwaite"] in response to the Publication Version of the Central Lancashire Local Plan 2023 - 2041 ["the draft Plan"] which was issued for consultation between February and April 2025.

We previously responded to the Preferred Options Part One (Regulation 18) in February 2022 and our substantive comments made at that time remain outstanding and relevant, and should be read alongside these updated representations. A further copy of our previous submissions is enclosed.

Background

Applethwaite is an award-winning SME housebuilder operating in Central Lancashire. It is owned by the Eric Wright Charitable Trust and its philosophy is a 'commercially focused business with a social purpose' based on the principles of local community well-being. It is a dedicated provider of retired and older people's housing and many of its developments are exclusively specialist bungalow schemes for people over the age of 55 which mainstream housebuilders do not provide. Its age-exclusive bungalows meet the Part M4(2) Accessible and Adaptable Homes building regulation standard and the Nationally Described Space Standard, and qualify as specialist housing for older people as defined in the PPG (63-010-20190626).

Bungalows have an enduring appeal and popularity¹ with retired and older people, and Applethwaite customers are typically homeowners wishing to continue living in their own home and maintaining independent, active lifestyles but wanting single-level living and to 'down-size' (right-size). They can require space for visiting family; home working; leisure pursuits; pets; a private garden; storage and a garage, as well as room for a carer when needed. These needs are not met by adapted two-story homes and retirement apartments, and 'pepper-potted' bungalows in large housing schemes seldom offer the peace of mind and quality of life provided by inclusively-grouped bungalow developments where similar neighbours provide mutual support. They also appeal to retired and older people who might otherwise consider sheltered accommodation but are not ready to move into more conventional forms of specialist accommodation.

¹ The report "Older People's Housing Preferences" published in December 2024 by Ipsos and Housing LIN, surveyed 5,500 older people aged 50+ in the UK. When asked '*What makes a good home?*' the results showed a strong (41%) preference and sentiment for bungalows as an older person's 'last move' home.

The ethos of Applethwaite bungalows is therefore fully aligned with the most recent expression of Government policy in the November 2024 Written Ministerial Statement (HCWS249) to widen housing choice for retired and older people (defined in the NPPF Glossary) so that they are able to continue living safely, securely, comfortably and independently in their own homes for as long as possible.

Older People's Housing Taskforce

Applethwaite is a longstanding advocate of reform to national planning policy and local development plans to improve understanding, boost the supply and delivery, and widen the choice and range of specialist housing to meet the needs of retired and older people. It therefore hoped that its deep knowledge, unique insight and experience of the retirement and older people's housing sector, and the personal circumstances, motives and requirements affecting its customers and their reasons for moving into bungalow developments, would be taken into account in preparing the draft Plan.

It is therefore disappointed that its comments made in response to the Preferred Options (Regulation 18) have not been incorporated. The continuing failure of the draft Plan to properly understand the wide and diverse range of specialist housing required to meet the needs of the ageing population in Central Lancashire and to plan for greater, easier and faster provision of all types, including inclusively-grouped bungalow developments in the right locations, is a key omission.

In this respect, it is critical that the draft Plan does not overlook the findings and recommendations of the independent Older People's Housing Taskforce, and which we consider is a highly material consideration in assessing soundness. The Government appointed the Taskforce in May 2023 to 'look at options for the provision of greater choice, quality and security of housing for older people' and the key messages of its report 'Our Future Homes: Housing that Promotes Wellbeing and Community for an Ageing Population' (published in November 2024) are:

- The Government recognises the importance of increasing the supply and improving the housing options for older people in later life, and will give careful consideration to the many recommendations set out in the Taskforce report.
- Providing a range of safe, suitable housing for older people in later life helps them live independently, safely and well, for longer. It can enhance the wellbeing of our senior citizens and reduce demand on adult social care services and the National Health Service.
- The Government is committed to helping older people to live comfortably and independently at home for as long as possible.

Alongside the Taskforce report, the Government published two related reports:

- 1) 'What Older People Want' - a rapid evidence assessment on what older people want and can afford, when it comes to their housing choices when looking to move
- 2) 'Patterns and Trends in Planning Applications for Older Persons Housing' - an exploration of factors impacting the delivery of planning permissions for older person's housing

Key extracts from all three reports are reproduced below and with the most important text underlined.

Taskforce Report 1) Our Future Homes: Housing that promotes wellbeing and community for an ageing population

Executive summary:

"Home" holds significant meaning for individuals of all ages, serving as a safe space where people can truly express themselves, pursue interests, connect with others and build memories. That does not change as we age.

When asked about the priorities they attach to their housing arrangements, the aspect that senior citizens mention most often is "independence". We have a wealth of evidence of the features of one's home that enable healthy, independent living. And indeed, it is not difficult to picture that for ourselves or for friends and family - a home where the physical fabric, the facilities and the fittings support our needs. Where we can connect with the wider community, local services and those from whom we may draw support. There is no single 'best' model for providing this in older age.

But as our population ages, we need to expand these housing options - not just in variety, but in volume as well. We need to offer senior citizens greater choice, particularly as their lifestyle and health needs evolve in later life. Ensuring suitable, accessible and affordable housing for later living is a societal obligation on which the current housing market falls significantly short.

Taskforce recommendations:

- No.2 Incentivise a wide range of older people's housing (OPH) / later living homes (LLH) options - senior citizens in the UK are not a homogeneous group. They are highly diverse in their needs, wishes, backgrounds and identities. Meaningful choice must be available and accessible to all.
- No.3 Ensure more housing is designed for later life - we have a growing ageing population and housing stock that does not meet their needs. We need to optimise all forms of OPH / LLH including mainstream housing, community-led housing, service-led housing and care homes. Homes need to be desirable, accessible, adaptable, technology-enabled, energy efficient and affordable to meet the housing needs and lifestyle of an ageing population.
- No.5 Expand OPH / LLH at scale that is affordable to live in and viable to build and operate - our collective ambition should be to urgently scale up the quality and quantity of the OPH / LLH market, at more affordable pricing, in order to open up new more age-appropriate choices in later life to people of lower to middle-affluence.
- No.6 Strengthen planning policies - our collective ambition should be to ensure that the planning system helps to deliver a greater volume and diversity of OPH / LLH by ensuring that there is a proper assessment and response to levels of need, that there is sufficient site allocation for all forms of OPH / LLH, and that local planning authorities make better and more timely choices in planning applications for OPH / LLH. National and local planning policy and practice can incentivise and accelerate the development of new forms of OPH / LLH and help shape mainstream housing and the built environment to be more age-friendly.

The challenge for the Taskforce:

Providing the variety, volume and choice that is needed to meet the needs of senior citizens today and in future years requires radical and ambitious action. A status quo is not sustainable.

52% of older people live alone, with lower wellbeing than those who live with others and higher rates of loneliness, and poorer physical and mental health. Increased travel time to senior citizens living dispersed and isolated lives means more social care staff are needed to provide care, at a time when the social care workforce is stretched. Housing solutions must promote social connection.

A troubling lack of supply of purpose-built OPH / LLH: At present an average of around 5-7,000 later living homes are built annually, out of a total c.200,000 newly built homes. This is in sharp contrast to the 30-50,000 new homes a year estimated to be needed to meet the ageing population.

We need to 'promote wellbeing'. Helping older people to live fulfilling lives in safe environments will help them live well longer and keep them out of hospital. Avoidable ill health is leading to overuse of already over stretched health and social care services. This is likely to get worse as the ageing population challenges adult social care and the workforce.

What stops senior citizens [from] moving [home]?

The Taskforce identified a range of barriers behind this including:

- strong psychological barriers associated with ageing
- difficulty disentangling housing needs from future health
- lack of awareness about the range of housing options
- concerns about cost and affordability
- availability of suitable housing.

There is a shortage of appropriate options for downsizing that are affordable and meet the housing aspirations of older people (relating to tenure, size, design, accessibility and location)

Ageing in place in mainstream housing:

Asked what they look for in a home, older people come up with similar words - community, belonging, safety, security - and in practical terms, living on one level in a home which is cheaper to run, easier to maintain and close to local amenities. A home which enables independence is key.

A wide range of age-friendly options:

To meet the diverse needs and preferences of our ageing population, local and national policy makers should strive to provide a range of choices. In addition to expanding the supply of purpose-built, service-led housing (supported living and assisted living) at affordable price points, we also need age-friendly and inclusive mainstream and community-led housing. Without action, housing developers will continue to build stock that is unsuitable for our ageing population, especially for people of lower to middle-affluence.

Strengthening planning policies:

Local authorities face a profound structural shift in the demographic balance of their populations and the way we plan for and deliver housing for an ageing population needs urgent reform.

Local authorities need to be given the right levers to reverse the chronic under supply of older people's housing to meet growing future demand. This means ensuring sufficient land is made available [by local plans] to support the volumes of new supply needed. Raising the profile and priority given to OPH / LLH in local plans will bring confidence to providers and help overcome the "social reluctance to plan for old age."

The reforms we [the Taskforce] propose are not just about fixing problems. They are about ensuring that local authorities become aspirational, age-friendly and inclusive place-makers and that planning for our ageing population should no longer be an afterthought, it should be integral to the way we plan our places and communities.

84% of Taskforce respondents considered that there should be a standard approach to assessing older people's housing need, and this should include a segmented understanding of diverse needs to prevent over reliance on one OPH / LLH type and should consider affordability.

There is a lack of awareness among local planning authorities of the benefits of older people's housing and the underestimation of OPH / LLH needs results in a lack of site allocations in local plans. Whilst PPG (63-013) states 'it is up to the plan-making body to decide whether to allocate sites for specialist housing for older people', research found that only 36.2% of plans have a specific policy for OPH/LLH and even fewer make specific site allocations. This leads to higher risk and uncertainty for developers. 66% of surveyed housebuilders who have left the OPH / LLH market thought that allocating suitable sites in local plans would encourage more supply and 33% of those not currently in the OPH / LLH market said it might encourage them to enter.

Based on Taskforce discussions with stakeholders, high performing local authorities who are successfully planning for OPH / LLH tend to share the following key attributes. They:

- a) understand the types and numbers of older people's housing required which is translated into a target future provision map.
- b) have clear plan policies that facilitate delivery of different types of older people's housing.
- c) have a clear designation and protection of site opportunities, backed by use of land assembly where required.
- d) have an expectation of OPH / LLH provision as part of larger strategic sites.
- e) have developed long-term relationships with OPH / LLH developers and providers to deliver a portfolio of provision over a period of time.
- g) are realistic in terms of viability

Taskforce Report 2) What Older People Want

This research was commissioned to look at the options for the provision of a greater choice of housing for older people.

Preferences and priorities:

- Most older people want to live independently in their own home for as long as possible.
- Whether older people 'stay put' or move, they place great emphasis upon being 'at home' and priorities centre on emotional attachments and the use-value of housing.
- Older people prioritise aspects of housing that support aspirations to age in place including to live independently, maintain wellbeing, exercise choice, be an active member of society, contribute to family life, not feel like a 'burden', and have good relationships with neighbours.
- Priorities for the physical dwelling and its location are considered in relation to how they meet these higher-order aspirations (for example, independence, wellbeing, social relations). Older people tend to be risk averse when evaluating whether different housing options will meet these fundamental aspirations. With the current home seen as more likely to meet aspirations than moving, which is often seen as an 'unknown'.
- When considering the location of their housing preferences, older people frequently cite the social benefits that arise from a sense of community and belonging, access to social networks and being close to family and friends.
- Older people value of living in housing that can accommodate changes in physical and cognitive functioning as they age. For example, single-floor dwellings, such as bungalows, and properties with stair free access are recognised as making a property more accessible and safer for older people. This is a common priority when moving in older age.

What opportunities exist for older people to move into mainstream housing that is more suitable by virtue of size, location and design?

Many older people who want to either move or downsize are put off by the lack of suitable alternatives, especially in the areas where they currently live. It is also important to recognise that suitable housing does not necessarily mean smaller housing. There can be good reasons why older people prioritise space and spare bedrooms. This includes having family and friends to stay, having visiting support and storing health and medical equipment.

Mainstream housing:

Despite awareness of the potential benefits of moving, some older people view the policy focus on down-sizing as frustrating because it deprioritises their wellbeing. The notion of 'ageing in the right place' has emerged as something of a counter to this agenda. This places older people's wellbeing at the centre of housing decisions, whether that be to stay put or move.

Barriers to moving:

The housing options available to many older people do not represent a substantial improvement upon their current living situation when considering cost, accessibility, and location, and there is limited supply of some of the most highly sought after forms of housing in old age (such as bungalows) across all tenures.

Moving destination:

Moving destination can be analysed in terms of distance (whether a move is local or to a new neighbourhood or region) and in terms of housing type (whether into mainstream or specialist accommodation). Most moves made by older people are local.

Taskforce Report 3) The failure of the planning system to deliver specialist housing for retired and older people

Importantly, the Taskforce also considered how the limitations and failures of the current planning system contribute to the undersupply of housing for retired and older people, and the difficulties which are frequently experienced by applicants, like Applethwaite, who try and persevere to deliver specialist housing. It is disappointing that these issues, which Applethwaite has highlighted to the Central Lancashire authorities for many years, are not addressed by the draft Plan where relevant.

- 1) The Taskforce's call for evidence and other engagement has shown widespread concern that local planning authorities are not sufficiently aware of the benefits of different types of older people's housing or the challenges to successful delivery.
- 2) Developing new OPH / LLH is hampered further due to the complexities in the planning system in England. Analysis for the Taskforce has found that planning consents granted in England for OPH / LLH are low and have fallen from about 180 in 2015 to just 80 in 2023.
- 3) The Taskforce research revealed trends and issues that arise in the planning system as it processes applications for OPH / LLH. There are several reasons for the lower success rate of applications for OPH compared with planning applications for general needs housing:
 - most local plans do not make specific allocations for OPH, meaning that OPH schemes either have to compete with general housing for sites, or try and gain permission on sites [which are] either not identified or not allocated for residential development;
 - competition for open market housing sites is difficult as some OPH schemes are lower density (e.g. bungalows) and have reduced returns for the landowner.
 - the difficulty in securing appropriate sites means that OPH schemes are often being pursued at unallocated locations or on sites outside of existing development boundaries which increases the likelihood of policy conflict and refusal.
- 4) Currently, very few sites are allocated for OPH/LLH, and appropriate sites can be hard for providers to identify.
- 5) The viability of private OPH/LLH is seriously challenged by the need for developments to make contributions to Section 106 requirements, affordable housing and CIL. Planning policy needs to recognise that the development economics for OPH / LLH can differ significantly from general housing due to the additional costs of non-revenue generating shared facilities and higher build costs of a fully adaptable and accessible built form.
- 6) The Taskforce heard that house builders have left the older persons housing market and that many private investors are hesitating to invest due to the higher perceived risks.

The findings and recommendations of the Older People's Housing Taskforce have been recently endorsed in the allowed appeal APP/A2335/W/24/3350855 by Applethwaite at land west of Sea View Drive, Hest Bank, Lancaster. In the decision letter dated 14th March 2025, copy enclosed with this representation, at paragraphs 90, 95 and 96 that Inspector confirms that 'contemporary, purpose-built, age-restricted specialist bungalows are in line with the findings of the Taskforce' and meet 'a real quantitative and qualitative national and local need for older persons accommodation.'

Representations in response to the draft Plan

Notwithstanding Applethwaite's disappointment that its comments made in response to the Preferred Options (Regulation 18) in February 2022 have not been incorporated, the overarching point is that the draft Plan fails to take account of, and meaningfully plan to meet, the specialist housing needs of the ageing population of retired and older people in Central Lancashire.

Paragraphs 4.1 to 4.3 and 4.10 of the draft Plan set out commendable aims and objectives to achieve a balanced housing market in which retired and older people's housing needs are met. It states that the plan plays 'a key role in providing the housing that Central Lancashire and its communities need'; a 'key objective is to deliver healthy, safe and inclusive communities', and 'ensuring access to a wide range and high quality of homes and other specialist forms of accommodation is important for our communities and society.'

However, in practice, the proposed policy mechanisms to deliver the stated aims and objectives for meeting retired and older people's housing needs fall very short of what is required for a sound local plan in 2025, and the opportunity (and necessity) to grasp and plan for meaningful change in the supply and delivery of retired and older people's housing has been missed. Based on the draft Plan, Central Lancashire is not 'an aspirational, age-friendly and inclusive place-maker', seeking to embrace the policy reforms which the Government's Older People's Housing Taskforce advocates.

The provisions in the draft Plan are limited to Policy HS6: Housing Mix and Density, Policy HS12: Specialist Housing and Policies SS3, SS5 and HS2 to HS4 Site Allocations. In combination, these policies are not effective and will not achieve the required outcomes to meet retired and older people's housing needs for the following reasons:

Policy HS6(1):

- a) A requirement to provide a mix of dwelling types and sizes is too generic and open-ended to achieve meaningful provision to meet a diverse range of retired and older people's housing needs. This reflects the Housing Needs and Demand Assessments evidence base² which does not provide a sufficiently segmented understanding of needs as recommended by the Older People's Housing Taskforce.
- b) Reliance on a 'one size fits all' approach of requiring all new dwellings to be built to the Part M4(2) Accessible and Adaptable Homes standard will not meet a diverse range of retired and older people's housing needs. It is also not clear that this measure can be guaranteed to meet needs in the absence of a requirement to impose an over-55 age restriction on a sufficient number of Part M4(2) dwellings, as they will be marketed as general needs housing and will not be reserved (and in perpetuity) exclusively for occupation solely by older people. There are also many qualitative shortcomings (in terms of internal accommodation and location) to adapted conventional two storey houses as providing suitable long-term homes for older people when

² N.b. Paragraph 6.11 of the South Ribble Housing Needs and Demand contains a typing error where it refers to 'meeting the needs of Wigan Borough and to align with Places for Everyone policies.' It may also cast some doubt on the robustness of the evidence as the report is clearly adapted from another.

compared with the obvious health and well-being benefits provided by other types of housing, and especially inclusively-grouped bungalow developments, and especially as a 'last move' home. These are set out in our Preferred Options representations and, in summary, confirm:

- Many retired and older people prefer to live on one level to suit their needs.
- Single level living provides personal safety and reduces the risk of falls and critical accidents by providing indoor and outdoor living environments with minimised risk.
- Single level living can easily accommodate changing personal healthcare and mobility needs over time.
- Single level living can reduce illness, social isolation, loneliness and depression and provides well-being, quality of life and peace of mind for residents.
- Single level accommodation is easier to maintain.
- Adapted two storey homes located within large housing estates, and often dispersed rather than clustered, do not provide the peace of mind and quality of life provided by inclusively-grouped bungalow developments where similar neighbours provide mutual support, and which is a crucial factor for many retired and older people choosing a home.

The Older People's Housing Taskforce highlights that there is 'no single best model for meeting older people's housing needs', and the consequence of these shortcomings is that adapted two storey mainstream housing can be a sub-optimal choice for many older people because it does not provide a substantial improvement on their current living situation when considering accessibility, wellbeing, location and value for money. In that scenario, as the Older People's Housing Taskforce research also confirms, older people choose not to move and their needs remain concealed and unmet.

Policy HS12:

This is a development management policy which will be used to regulate qualifying specialist housing windfall proposals which come forward, rather than being a planned, proactive and prescriptive measure to meet retired and older people's housing needs and put a dedicated and protected land supply in place. Paragraphs 4.91 to 4.94 of the supporting text are also at odds with the policy as they confirm the scale of the aging population in Central Lancashire and the 'increased need for specialist housing for older people', yet they relate to a reactive, development management policy rather than pro-active policies to prescribe housing mix and allocate land to ensure that identified needs are met.

Policies SS3, SS5 and HS2 to HS4:

There are references in Policy SS3(3)(f) and Policy SS5(4)(i) which require a range of house types and tenures, including older people's housing, to be provided at strategic sites, and Housing Site Allocations HS4.13 and HS4.14 contain wording in the Key Development Considerations that they are 'considered suitable for delivery of specialist older person housing'. These measures are generic and only encourage provision. They do not set prescriptive (quantified) segmented type and mix requirements and, clearly, do not allocate land to meet older people's housing needs.

Consequently, the draft Plan does not identify and protect a specific land supply to be used exclusively to meet older people's housing needs, and therefore, it does not assist older people's housing providers, and especially SME providers such as Applethwaite, to acquire sites in suitable locations without having to compete with mainstream housebuilders and at open market values.

Required modifications to make the draft Plan sound

When assessed against Government policy as stated in the November 2024 Written Ministerial Statement (HCWS249) to widen housing choice for older people so that they are able to continue living safely, securely, comfortably and independently in their own homes for as long as possible, together with the NPPF and PPG, the draft Plan cannot be considered sound.

To address this, Policy HS6(1) (and strategic and larger housing site allocation policies) could be modified so that they are more effective and successful in facilitating delivery of a greater amount and greater diversity of older people's housing throughout Central Lancashire to meet needs. The policy would set out a segmented, quantified, breakdown of the different types and mix of older people's housing required rather than simply requiring all new dwellings to comply with the Part M4(2) building regulations standard which is not necessary nor effective. The mix would include specialist bungalows and provision for them to be delivered by a specialist provider in inclusively-grouped settings.

The better and preferred modification however, in order to ensure that the draft Plan is fully fit for purpose and has the attributes of one prepared by a 'high performing local planning authority which is successfully planning for older people's housing' as advocated by the Older People's Housing Taskforce, is to include a portfolio of site allocations which are identified and protected for exclusively older people's housing, and attractive to specialist SME providers such as Applethwaite.

Additionally, another highly-beneficial modification to boost supply and delivery, is to include an exception policy in the draft Plan which supports and enables windfall development proposals for specialist housing for older people to come forward outside of site allocations in suitable and sustainable locations, and including in the Green Belt on the basis that unmet older people's housing needs amount to exceptional circumstances.

Omission site - Land east and west of Whittle-le-Woods, Chorley

Applethwaite has proposed two sites for allocation on land east and west of Whittle-le-Woods, Chorley for inclusively-grouped age-restricted specialist bungalow developments. The merit of these sites and their availability, suitability and achievability is unchanged from the Preferred Options (Regulation 18) submission and they are put forward again in these representations³ for inclusion as site allocations exclusively for older people's housing in Policy HS2. The Development Statement showing how the sites can be developed is enclosed with these representations. It shows that the release of the sites will not harm the function of the Green Belt in Chorley as a whole; that the sites can respectively accommodate around 35 no. and 55 no. older people's age-restricted specialist bungalows, and that there are no technical and environmental constraints to development.

Yours sincerely

Graham Love MRTPI

graham@sl-planning.co.uk

Enc. 1 - Comments submitted by Applethwaite on 24.02.2022 in response to the Preferred Options consultation

Enc. 2 - Appeal decision APP/A2335/W/24/3350855 - Land west of Sea View Drive, Hest Bank, Lancaster

Enc. 3 - Development Statement for land east and west of Whittle-le-Woods, Chorley proposed site allocation

³ See enclosed Development Statement

24th February 2022

Part One Preferred Options Consultation
Central Lancashire Local Plan Team
Civic Offices
Union Street
Chorley PR7 1AL
CentralLancashirePlan@chorley.gov.uk

smith&love
PLANNING CONSULTANTS

Our ref: APPL117

Dear Sir or Madam,

**RESPONSE BY APPLETHWAITE LTD
CENTRAL LANCASHIRE LOCAL PLAN 2023 - 2038 PREFERRED OPTIONS
PART ONE (REGULATION 18) CONSULTATION DECEMBER 2022**

These comments are submitted on behalf of our client Applethwaite Ltd ["Applethwaite"] in response to the Preferred Options Part One version of the Central Lancashire Local Plan 2023 - 2038 ["the draft Plan"] which was issued for consultation between December 2022 and February 2023

Background

Applethwaite is an award-winning SME house builder operating in Central Lancashire. It is the homebuilding division of the Eric Wright Group of healthcare, commercial property, engineering and construction businesses. Owned by the Eric Wright Charitable Trust, its philosophy is a 'commercially focused business with a social purpose' based on the principles of sustained employment and local community well-being.

In this context, Applethwaite has become an unparalleled developer of high-quality traditional bungalows for retired and older people over the age of 55 which mainstream house builders do not provide. Its bungalows are built to Part M4(2) Accessible and Adaptable Homes building regulation standards and qualify as specialist market housing for older people as defined in the Planning Practice Guidance (ID: 63-010-20190626). Its developments range mostly between 20 and 50 no. bungalows in sustainable locations within and on the edge of desirable towns and large villages.

Applethwaite bungalows are bought by retired and older people who are typically homeowners wishing to continue living in their own home and maintaining independent and active lifestyles but wanting single-level living and to 'down-size' (right-size). They consequently require space for visiting family and grandchildren; home working; leisure pursuits; pets; a private garden; storage and a garage, as well as room for a carer if and when needed. These needs are not met by the serviced-apartment retirement living model and 'pepper-potted' bungalows on mixed housing estates seldom offer the peace of mind and quality of life provided by exclusive bungalow community developments.

The ethos of Applethwaite bungalows is fully aligned with Government policy to widen housing choice for retired and older people (as defined in the NPPF glossary) so that they are able to continue living safely, securely, comfortably and independently in their own homes for as long as possible.

Examples of age-restricted specialised bungalow communities developed by Applethwaite in Central Lancashire within the last five years include:

- Preston Application 06/2017/0676 - 20 no. bungalows at Preston Road, Grimsargh approved on 29th January 2019
- South Ribble Application 07/2020/00277 - 14 no. bungalows at Oldfield, Much Hoole approved on 13th July 2020
- Preston Application 06/2018/0590 - 35 no. bungalows at Cumeragh Lane, Goosnargh approved on 29th September 2020

Applethwaite's in-depth knowledge of the retirement and older people's housing market; its understanding of its customers' circumstances, motives and requirements; and, its expertise and experience in the land acquisition and development process and engaging with the planning system to develop bungalow community schemes, gives it a unique insight which many non-SME and non-specialist house builders and local planning authorities are simply not aware of. We hope that this knowledge and insight from a local industry leader in the sector is valuable in helping to improve and tailor the next version of the draft Plan to meet the housing needs of retired and older people across Central Lancashire to the best of its abilities.

Comments on the draft Plan

Applethwaite is a longstanding advocate of reform to national planning policy and local development plans and SPD/SPG, to improve understanding, boost the supply and delivery, and widen the choice and range of specialist housing to meet the needs of retired and older people.

The first major indication of the need for a national policy to address older people's housing needs appeared in the White Paper 'Fixing Our Broken Housing Market' in February 2017. This was followed by the Second Report of Session 2017-19 of the Housing, Communities and Local Government Parliamentary Select Committee inquiry into 'Housing for Older People' (CM 9692) of September 2018, and the Government's response which was the catalyst for the revisions and provisions for Housing for Older People added to the Planning Practice Guidance and NPPF Glossary in June 2019.

The current DLUHC consultation on further reforms to the NPPF (Levelling-up and Regeneration Bill: Reforms to National Planning Policy) continues the reform and proposes changes to Paragraph 62 of the NPPF 2021 to make it absolutely clear that the need to provide housing for older people, in terms of a greater amount and wider choice of size, type and tenure, and which should be reflected in planning policies, includes the specific need for retirement housing, housing-with-care and care homes. The section 'More older people's housing' of the accompanying consultation document makes clear that: (our emphasis)

- the Government is committed to further improving the diversity of housing options available to older people and boosting the supply of specialist elderly accommodation.
- We [the Government and LPAs] need to ensure that our housing market is prepared for this [ageing population] challenge and that older people are offered a better choice of accommodation to suit their changing needs, to help them to live independently and feel more connected to their communities. In 2021, a report by the International Longevity Centre indicates that there will be a shortfall of 37% in specialist retirement housing by 2040.

- We [the Government] have therefore been considering ways in which the NPPF can further support the supply of older people's housing. We propose to do this by adding an additional specific expectation that, within ensuring that the needs of older people are met, particular regard is given to retirement housing, housing-with-care and care homes which are important typologies of housing that can help support our ageing population.

Applethwaite has also engaged with the Central Lancashire Authorities during the preparation of the draft Plan. It submitted comments at Issues and Options stage (14th February 2020) explaining the need for a robust portfolio and distribution of smaller (and where necessary greenfield) site allocations at suitable settlements made specifically for retired and older people's housing, and especially age-restricted specialist bungalows delivered by SME developers, given the constraints to development and viability challenges they face in a competitive land market open to volume mainstream house builders. It also responded to the data gathering carried out for the 'Local Housing Needs and Demand' evidence base studies for the draft Plan as well as engaging with the consultant Arc4.

Therefore, as an experienced and expert SME provider of age-restricted specialist bungalows for retired and older people, Applethwaite welcomes the acknowledgement and detail provided in the draft Plan and evidence base (Central Lancashire Housing Study - September 2022 and the Housing Need and Demand Assessments for each Authority) which highlights and quantifies the critical need to increase and diversify the supply of specialist housing for older people to enable them to live independently in their own homes for as long as possible. The evidence confirms: (our emphasis)

- The Central Lancashire population is ageing and the number of people aged 65+ has increased by 40% (equivalent to 20,000 additional people) since 2001
- By 2038 the number of people aged 65+ is expected to increase by almost 10,000 and the number of households headed by someone aged 65+ is expected to increase by 40%
- 2021 household survey data shows that 50% of older people want to remain living in their current and/or own home with help and support when needed
- 2021 household survey data shows that 58% of older people planning to move require a property with fewer bedrooms and 32% require a property with the same number of bedrooms or more
- The present housing stock across Central Lancashire is mismatched to older peoples' needs and aspirations
- Older persons housing is not a commercially competitive product and bungalow development can be financially challenging which is fuelling the housing crisis and gulf between general needs housing and full residential care with little provision in the middle
- The health and lifestyles of older people and their housing needs differ greatly, ranging from accessible and adaptable general needs housing to specialist housing with high levels of care and support
- There is a clear need for a broader, more-diverse housing offer for older people.

Converted into a housing requirement, there is a need for 3,387 more units of accommodation for retired and older people across Central Lancashire by 2038, which is 188 per year, and including sheltered / retirement housing, extra care provision, co-housing and residential care. N.B.: It should be noted that the individual Authority requirements of 1,903 in Preston, 771 in Chorley and 1,034 in South Ribble add up to a higher figure of 3,708.

However, Applethwaite is disappointed that despite endorsing the benefits of providing a better choice of accommodation that responds to the changing needs of retired and older people (at supporting text paragraph 6.3) and despite the promise of a 'range of [housing] site sizes and locations to be provided in line with housing allocation policies' in Policy Direction 11, the draft Plan fails to make satisfactory provision to meet the full range of retired and older people's diverse housing needs to suit their health and lifestyles. The failure of the draft Plan to facilitate greater, easier and faster provision of the type of age-restricted specialist bungalows which Applethwaite provides is a key omission, and the draft Plan contains no proposals or policy measures to meet the housing needs of those older people - of which there are many - as evidenced by the continually over-subscribed interest and waiting lists for Applethwaite developments.

Draft Policy Direction 15: Balanced Housing Market

Applethwaite therefore objects strongly to Policy Direction 15 as the sole means of boosting the supply and delivery, and widening the choice, of specialist housing to meet the diverse needs of retired and older people in the draft Plan. Applethwaite has explained why a policy mechanism, which simply requires house builders to comply with an indicative mix, on suitable sites, (of broadly 68% houses, 14% apartments and 18% bungalows / level-access homes) is too crude, too easy to circumvent and fails to understand the complexity and subtlety of retired and older people's circumstances, motives and requirements when they are considering a move, down-sizing (and right-sizing) from a family home to a specialist bungalow which suits their health and lifestyle.

When mainstream general needs housebuilders are required, as a result of a housing mix policy, to provide bungalows within their developments it is invariably the case, that to minimise cost:

- only the required minimum number of bungalows will be provided;
- only the required minimum type, size and specification of bungalow will be provided; and,
- only a minimum number of bungalows will be made available for private sale with the majority counting towards the affordable housing provision within a development scheme.

It is also often the case that only pairs or small numbers of bungalows will be clustered together and bungalow plots will be spread ('pepper potted') in isolated locations, without retired or older immediate neighbours, within a large housing estate scheme built for working families, on the flawed basis that this is good practice which should be encouraged.

Bungalows provided on this basis do not meet the majority of retired and older people's needs and requirements; compare poorly to the type, size, specification and private-sale tenure of bungalows built by Applethwaite for its customers; and, are consequently not attractive to all older households. Whereas mainstream house builders do not provide bungalows out of choice, as they are less profitable to build than two storey dwellings within a solely housing scheme, Applethwaite does, and does so with the objectives of providing quality and high-standards in mind, which retired and older people greatly value when down-sizing (right-sizing) from a family home to a bungalow.

A bungalow must be attractive to the market to be fit for purpose and meet needs. If a bungalow, or the choice and availability of specialist accommodation in an area is sub-optimal, retired and older people will be deterred from moving and their needs will be concealed, and they will continue living

in over-sized, under-occupied and increasingly unsuitable two storey houses which could be unlocked and recycled for new family accommodation. Two factors are important in their decision:

1. Firstly, the benefits of age-exclusive housing for retired and older people's mental health and social well-being are well documented. Living in high-quality adapted and accessible bungalows in well designed, secure and inclusively-grouped clusters with retired and older neighbours, and without compromising on their quality of life, privacy and amenities, provides older people with the peace of mind they need at their stage in their life, and can thereby avoid problems such as chronic and acute illness, social isolation, loneliness, anxiety and depression.
2. Secondly, whilst retirement living apartments overcome problems of social isolation and loneliness by providing a communal setting, the needs of retired and older people (the 'active elderly') in 2023 (and increasingly to 2038) are very different from previous generations, and their aspirations around housing and maintaining independent lifestyles have changed dramatically. Research by the NHBC and the Housing Learning and Improvement Network (Housing LIN) confirms that people over 55 are motivated by the same desires as younger age groups and many remain economically active. Older people consequently require homes with more amenities, a private garden, car parking and space for pets, hobbies, home-working, storage, visiting family and friends and looking after grandchildren and 'sleepovers', as well as space for live-in or visiting carers and companions as they get older. Applethwaite customers therefore do not choose the serviced apartment model, and volume retirement apartment providers are increasingly switching and including bungalows within their retirement schemes.

Bungalows provided by mainstream house builders within large family housing estate developments simply do not meet these social-wellbeing and lifestyle demands and requirements, and retirement apartments in managed communal settings cannot accommodate the lifestyle requirements of the active elderly compared to a specialist high-quality modern bungalow.

It is also the case that a two story house adapted (or capable of being adapted) to Lifetime Home / Part M4(2) building regulation standards, by installing a stair lift etc, does not (and cannot) match the advantages and benefits of single-level accommodation provided by a purpose-built specialist bungalow in terms of ease, comfort and convenience as a living environment; personal safety and reduced risk of falls and critical accidents; easier maintenance and cleaning; and, reduced stress, worry, illness and depression. And because an adapted two storey house will still be attractive to the wider market and suitable for occupation by other households (unlike age-restricted bungalows), they are often released for general market sale if they are not bought by older people within an initial period after becoming available.

Put simply, a 'one size fits all' solution to meeting retired and older people's specialist housing needs does not work and a policy requiring large housing sites to deliver a mix of accommodation including bungalows must be supplemented by other proposals and policies if the draft Plan is to be capable of confidently meeting retired and older people's needs as paragraph 62 of the NPPF 2021 requires. And, this now has added emphasis in the 2023 proposed NPPF changes and Government expectation requiring local planning authorities to positively and pro-actively boost the supply and delivery of specialist housing for retired and older people and provide better diversity and choice.

Correcting the draft Plan

Rather than planning to meet the specialist housing needs of retired and older people as a minimum, in terms of both quantity and quality, and which a mandatory housing mix policy is, by design, engineered to achieve, the draft Plan should include a combination of proposals and policy measures which boost and maximise all opportunities to increase and diversify the range of housing and accommodation options for retired and older people.

a) Allocating land for retired and older people's housing development

This first solution is obvious and advocated by Government in the Planning Practice Guidance at ID: 63-013-20190626 which says: (our emphasis)

Do plans need to allocate sites for specialist housing for older people?

It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to public transport, local amenities and health services.

There are several very important points in this paragraph:

1. Allocating sites provides greater certainty for developers:

This point is fundamental for SME specialist developers of retired and older people's housing like Applethwaite. Land allocated specifically and solely for retired and older people's specialist housing will provide SME developers with a supply of sites which they will be able to acquire without having to compete against volume mainstream house builders in an open land market and their far greater economies of scale and buying power.

2. Allocating sites encourages the provision of sites in suitable locations:

This is also fundamental and enables land to be provided in the locations where retired and older people want (and would choose) to live within and on the edge of sustainable villages and smaller towns, as opposed to isolated bungalow plots provided in the midst of expansive family housing estates. The PPG highlights that 'the location of housing is a key consideration for older people who may be considering whether to move' and Applethwaite knows from its customer feedback and waiting lists that the lack of suitable specialist housing opportunities in town and village locations where retired and older people want to move to (to stay in or relocate to an area) is one of the prime reasons why they do not move and a key barrier to down-sizing (right sizing).

3. Allocating sites is appropriate where there is an identified unmet need for specialist housing:

This is plainly the case in Central Lancashire as the comprehensive and in-depth evidence base compiled by Arc4 confirms.

The current Preston Local Plan 2015 includes site allocations for older people's housing, whereby Policy WB2 allocates land at Preston Road, Grimsargh for sheltered/extra care housing for the elderly (which Applethwaite and the Eric Wright Group successfully secured) and provides a precedent which can be easily expanded to other forms of specialist housing and across all three Authority areas.

b) Including a permissive criteria-based exception policy

In addition to site allocations made solely for retired and older people's specialist housing developments, the draft Plan should include a development management 'exception policy' which operates in the same way as a permissive rural exception policy for 100% affordable housing schemes on greenfield sites where mainstream general needs housing would not be permitted. This would enable planning applications for specialist housing for retired and older people to be made on a windfall basis in and around the sustainable villages and towns where demand and need is greatest.

Land east and west of Whittle-le-Woods, Chorley

As part of its comments on the draft Plan, Applethwaite wishes to put forward a proposal for a site allocation for age-restricted specialist bungalow development for older people. This is the type of site opportunity it requires in terms of the type and size of site, and its location at a desirable large village within a popular retirement housing market area offering the quality of life and well-being retired and older people seek in considering a move to down-size (right size) from a family home to begin a new chapter in their lives.

Applethwaite controls two parcels of land at Whittle-le-Woods in Chorley which adjoin the urban boundary on the east and west sides of the settlement, and which is called 'Land East and West of Whittle-le-Woods' for the purposes of these comments. The west land is already included in the draft Plan evidence base (as SHELAA site ref. 19C135) having been put forward in the first call for sites (ref. CLCFS00456b). The east land is put forward now and comprises land south of Moss Lane and east of Preston Road. Both land parcels are currently in Green Belt, albeit adjoining the settlement boundary, and are sustainable opportunities for the development of age-restricted specialist bungalows for retired and older people which can be removed from the Green Belt (proposed net development areas only) without harming its strategic function and key purposes around the settlement of Whittle-le-Woods.

Applethwaite has prepared a Development Statement for its land East and West of Whittle-le-Woods which is submitted with these comments.

Applethwaite notes that the draft Plan does not propose to remove land from Green Belt to meet housing needs. The large and increasing, urgent need for specialist housing to meet the needs of retired and older people, including the type of bungalows provided by Applethwaite, is distinct from mainstream general needs housing and on the basis that this can justify windfall development within Green Belt, it can equally justify the removal of sustainable land from Green Belt in sustainable locations. The appeal decisions below were all allowed on the basis that the benefits of providing specialist accommodation for older people outweighed harm to the Green Belt and thereby amounted to very special circumstances to justify inappropriate development.

- APP/H2265/W/18/3202040 West Malling, Kent 2018
- APP/A0665/W/18/3203413 Great Broughton, Cheshire 2019
- APP/G2245/W/21/3271595 Edenbridge, Kent 2019
- APP/W0530/W/21/3280395 Stapleford, Cambridgeshire 2021
- APP/B1930/W/21/3279463 St Albans, Hertfordshire 2022

The test for exceptional circumstances is a less demanding test than demonstrating very special circumstances as confirmed by legal authority in *Compton Parish Council v Guildford Borough Council* [2019] EWHC 3242 (Admin).

The Green Belt analysis provided in the enclosed Development Statement and the draft Plan Green Belt evidence base, demonstrates that the removal of the land east and west of Whittle-le-Woods will not harm the strategic function and purposes of the Green Belt surrounding the settlement, and the lack of non-Green Belt options at Whittle-le-Woods to provide specialist bungalow communities for retired and older people of the type, scale, quality and location-requirements provided by Applethwaite, together with the benefits in meeting identified needs and many wider benefits, amounts to exceptional circumstances.

Conclusion

We trust that our observations are helpful and thank you for the opportunity to comment on the draft Plan. We encourage the Central Lancashire Authorities to incorporate Applethwaite's suggested changes to allocate land for specialist housing for retired and older people and include a suitable windfall 'exceptions' policy in the next version of the Local Plan, together with the allocation of the land it controls east and west of Whittle-le-Woods, Chorley for two age-restricted specialist bungalow communities for retired and older people which will be a long-term asset to the village and Borough.

Applethwaite is keen to engage further with the Central Lancashire Authorities to discuss our representations in more detail, and please contact me if you have any questions and/or if we can provide any further information.

Yours sincerely

Graham Love MRTPI

graham@smithlove.co.uk

Encs:

1. Development Statement for Land East and West of Whittle-le-Woods
2. Call for sites form
3. Specialist housing for older people: A summary of wider policy guidance, research and good practice prepared by Smith & Love Planning Consultants 2021

Specialist housing for older people:

A summary of wider policy guidance, research and good practice

Housing for Older People - Parliamentary Select Committee Inquiry¹

The Government's response to this Inquiry into Housing for Older People published in September 2018, was the pre-cursor and catalyst for the revisions and provisions for Housing for Older People added to the NPPF Glossary and Planning Practice Guidance in June 2019.

The Inquiry, which follows the report of an earlier House of Lords Select Committee², was convened to examine whether the amount and type of housing currently available to older people, is sufficient and suitable for their needs and, in doing so, to consider how older people wish to live. It also took the context of significant housing shortages, rising numbers of older people and pressures on health and social care budgets into account. It heard evidence from the Elderly Accommodation Counsel, retirement, care and specialist housing developers, housing research consultants, local authorities, affordable housing providers and social welfare professionals.

The Government Response to the Committee's recommendations begins by acknowledging that the UK has a rapidly ageing population and the needs of older people now, are different from previous generations, and their aspirations around housing and lifestyles have changed dramatically.

The Government is committed to offering older people a better choice of accommodation which can help them to live independently for longer, improve their quality of life and free up more family homes for other buyers. It also recognises that ensuring the right and adequate housing for older people can reduce costs to the social care and health systems. Three key recommendations from the Inquiry and the Government's responses are summarised below;

Recommendation: *The right kind of housing can keep people healthy, support them to live independently and reduce the need for home or residential care.*

Response: The Government will continue to consider the range of housing available to older people, including new innovative models and those which support interactions across generations.

¹ Government response to the Second Report of Session 2017-19 of the Housing, Communities and Local Government Select Committee inquiry into 'Housing for Older People' (CM 9692) - September 2018

² Report of Session 2012-13 of the House of Lords Select Committee on Public Service and Demographic Change 'Ready for Ageing?' (HL140) - March 2013

Recommendation: There is a shortfall in supply of specialist homes in general and particularly for private ownership and rent and for the 'middle market'. This limits the housing options available to older people and the opportunity to derive the health and wellbeing benefits linked to specialist homes. Specialist housing, and particularly extra care housing, can promote the health and wellbeing of older people and their carers, leading to savings in spending on health and social care.

Response: A safe and suitable home may be a housing option with increased levels of care and support, and it is crucial that enough of this kind of housing is provided. What constitutes a safe and suitable home is different for different people, so we want to provide access to as many different options as possible.

Recommendation Given the enduring popularity of bungalows among older people and their accessibility features, more councils and developers should consider the feasibility of building bungalows.

Response: We agree that local authorities should plan for the future housing needs of older people so they are able to live safely, independently and comfortably in their homes for as long as possible, or move to more suitable accommodation if they wish. That is why our planning guidance makes clear that local authorities should plan for various general housing options, including bungalows, which are suitable for independent living for older people.

Ministerial Press Release: Better homes and bungalows for Britain's older people

This press release of 21st March 2015 confirms the Government's support for older people to be given a greater choice of where they live during retirement. It makes clear that local authorities have a responsibility to ensure the needs of older residents are met when planning for new homes, and a wide range of different properties are built to meet the diverse housing needs of an ageing population, including high quality purpose-built bungalows.

Housing White Paper: Fixing our broken housing market (February 2017)

Preceded by the statement from Sajid Javid MP (the Secretary of State at that time) that 'in the face of a housing crisis, the Government would ensure that developers offer a "proper supply of suitable smaller homes" so that people are able to downsize as they get older', the White Paper set out a number of proposals for reform of the planning policy to improve the supply and choice of specialist housing for older people. It proposed to;

- improve options for older people;
- simplify the process of identifying housing requirements, particularly for different groups, such as older people;

- acknowledge that people are living longer;
- help people to live independently for longer through the provision of suitable accommodation, reducing burdens on health and social care, and;
- explore ways to stimulate the market to deliver new homes for older people

In a wider context, the White Paper also aims to open the market to SME house builders to address the current reliance on the small number of volume builders delivering older peoples' housing, of which the majority develop retirement apartments rather than bungalows. This will ultimately result in localised benefits and boosted delivery on smaller sites.

Planning for the right homes in the right places

In September 2017 the Government issued this formal consultation to further consider proposed measures set out in the White Paper. It contained a dedicated section relating to planning for older people's housing and sought to improve guidance for local planning authorities as to how they should assess need for this demographic. The document also acknowledges that a range of housing types are required to meet older peoples' need including specialist general market housing.

Housing our ageing population - Local Government Association

In parallel with the Right Homes in the Right Places consultation, the LGA published this study of current need and an assessment of good practice within local authorities. The study is set against projected household growth, showing in that between 2008 and 2039, 74% of households will include someone aged 65 or older. A series of recommendations are derived from evidence provided by industry professionals and stakeholders who are intended to appraise the government, policy makers and local authorities of the opportunities available to meet the needs of an ageing population.

The LGA report confirms the acute and urgent need to provide greater housing choice and an improved offer for older people. As a result of extended life expectancy, many retired people wish to remain in the same areas and live active and independent lives until they may choose to move to supported living. In the interim however it is recognised that there is a "chronic under supply of high quality, affordable or desirable accommodation in the right locations". Councils can help to address this by 'facilitating and promoting the supply of housing for older people through their local plan and support of well targeted and considered housing proposals.'

The future of an ageing population - Government Office for Science

Amongst the wider analysis in this 2017 research, is an assessment of the changing demand for housing and how that should be met. The demand is driven by the reasons referred to above and accounting for a lack of suitable stock. This subsequently impacts on the housing ladder due to longer term occupation of properties designed for families, by older people.

'Lack of suitable homes for older people fuels the housing crisis' - The Guardian (2019)

This article explains the growing qualitative trends among the over 55 population and their housing choices. It shows that the type, quality and amount of living space and the location of housing, are increasingly important factors influencing people's choice of housing as they age and their needs and priorities change.

A lack of indoor and outdoor space and accessible and adaptable single floor accommodation, are cited as key barriers preventing active older people moving (downsizing) to mainstream and retirement housing, together with the lack of supply and choice in the communities where they currently live and want to remain.

Right-sizing: Reframing the housing offer for older people - Housing LIN

Despite common assumptions that older people want to downsize to a smaller property or enter sheltered accommodation as they age, this 2018 research confirms that increasing qualitative requirements are overlooked by the retirement housing industry and people over 55 are motivated by the same desires as younger age groups. For example, wanting additional space and a guest bedroom for visiting family, grandchildren and friends, having suitable outdoor garden space, having an outdoor area and room for a pet, having a garage and room to store belongings and equipment, and moving to a nicer area with similar neighbours.

For these reasons, the development industry and local authorities must shift their emphasis from 'down-sizing' to 'right-sizing' and providing better and more diverse options, including private bungalows, when planning for older peoples housing provision. Right-sizing is defined as;

- Right-sizing: an older person's active, positive choice to move to a new suitable home as a means of improving their quality of life

The research reveals that many over 55 households cannot move home in the way that they would like due to a lack of suitable housing options. There is a lack of appropriate mainstream residential development (such as bungalows) that serves the needs of older people³. The current focus on providing extra-care housing and retirement living might be serving the needs of some particular groups, but these are not suitable for everyone and are not always within the areas where people have established social networks.

³ The longstanding under supply of bungalows relative to demand is reported in the 2012 Policy Report by Shelter: A better fit? - Creating housing choices for an ageing population.

Moving insights from the over 55s: What homes do they buy? - NHBC

This report highlights the fact that the housing market for over 55s offers limited choice and available housing options delivered by the private retirement housing market do not meet all households' quantitative and qualitative needs and aspirations - i.e., a 'one-size-fits-all' approach is not fit for purpose and a lack of choice and availability is preventing older households moving from over-sized and/or unsuitable properties into purpose-built housing for older people.

Bungalow living: An attractive alternative for downsizers - Housing LIN

Building on earlier research⁴, this report highlights the benefits of high-quality private bungalows as a housing choice for over 55 people considering relocation (and releasing equity) from larger family housing. It explains that there is little choice for older people who want to make their last house move into a dwelling that is future proof.

The majority of owner occupier two-person households in the UK live in a three bedroom home as retiring couples require more space as they spend more time at home rather than at work; spare rooms are used for home working and hobbies, and space is needed to accommodate visits from children and grandchildren, as well as regularly providing child care for working parents, and they want storage space for belongings and possessions. They also want some private garden area for enjoyment, outdoor relaxation, socialising and keeping pets, and they want garage space and parking for at least one car. It is plain that a typical two-bedroom retirement apartment within a managed communal setting does not accommodate this lifestyle.

Bungalows offer the product that many households desire but which the industry does not deliver in sufficient numbers and in terms of quality and location. The best housing for older people in later life increases well-being, reduces care home admissions and offers major savings to the health service. However, the amount of such stock is reducing in proportion to the rapid increase in older people.

A home for the ages - Planning for the future with age-friendly design (July 2019)

This report by the RIBA and Centre for Cities highlights that the housing stock in England is not fit for purpose in meeting older persons' needs. It utilises survey data by ComRes which shows there is an acute shortage of all types of age-friendly homes and a huge market for purpose-built housing for older people which is not being met. It reports that;

- 50% of people aged over 55 considering moving home feel that the housing options available are inadequate;

⁴ 'Top of the Ladder' 2013 - Research by DEMOS which highlights the lack of choice of suitable homes for older people to downsize

- There is an acute shortage of accessible homes;
- Seven in ten respondents prioritised a housing need for ground floor living, enabling independent living and/or being adaptable to changing needs;
- 69% of over 55s said that moving to housing that is better designed for their needs is a strong consideration in their decision;
- The lack of down-sizing options for older people is hitting young families hard;
- Age-friendly housing will save overstretched NHS resource.

‘Shortage of new bungalows puts elderly people at risk’ - The Times (2017)

This is one of many articles reported in the media in the last two years and refers to research by the National House Building Council which found;

- House builders are not constructing enough bungalows as profit margins are lower than two storey dwellings;
- the number of bungalows built each year has reduced from 30,000 to 2,210 in the past 30 years;
- whereas bungalows once represented 1 in 6 of all new dwellings constructed in England and Wales, the figure now stands at 1 in 63, and;
- consequently, developers may stop building bungalows all together in the next 5 years without Government intervention.

In response to the study and within the same article, the Home Builders Federation commented on the issue in relation to the impact of land values and viability. Its spokesperson explained that;

- *Land is at a premium and landowners know what they can sell land for, so in many cases it is not viable to build bungalows because the number of rooms you get compared to a two or three storey house is lower. There are solutions available through the planning system where local authorities allocate land for retirement housing only and this is reflected in sale price to the developer.*

Why has the number of bungalows being built in the UK collapsed despite an ageing population?

This earlier BBC article from 2016 highlights the same issues and trend. It explains that with the ageing UK population, demand for single story homes remains high from people approaching retirement; people who are unsteady walking and want to avoid climbing stairs, and those with limited mobility and requiring wheelchair access, but developers dealing with high land prices are under pressure to build upwards. It quotes NHBC data for 2014 when just 1% of new build housing in the UK was bungalows, compared to 7% in 1996, whilst the proportion of new homes which were flats or maisonettes, has more than doubled from 15% to 33%.

It explains that land economics is driving the downturn in building bungalows as land prices are making them unviable (Rico Wojtulewicz - policy adviser to the National Federation of Builders), as volume house builders dominate the construction industry and focus on traditional houses and flats.

The end of an era for bungalows?

This paper by the Papworth Trust dating from the same time as the above BBC article, also focuses on the year-on-year decline in new bungalow development, despite the fact that they remain extremely popular, the desperate need for them and the clear benefits they offer to older people by providing them with many years of independence in retirement before they consider sheltered accommodation or moving in with family. It explains that bungalows have become a lot less profitable for housing developers however due to rising land costs and fierce competition in the market, because they take up more land and because a single-storey dwelling will seldom be as valuable as a two or three-storey house.

The paper quotes Steve Turner from the Home Builders Federation who said;

- *Bungalows as a housing type are more expensive than other homes because of the land cost. A landowner will want the same return for their land whether a three-bedroom bungalow or a three-bedroom house is going to be built, but a three-bedroom house normally is going to sell for a lot more than a three bedroom bungalow.*

Housing for an ageing population - Preserving independence (April 2018)

Following on from the 2018 Housing, Communities and Local Government Select Committee inquiry into 'Housing for Older People', this report by the All-Party Parliamentary Group (APPG) on Housing and Care for Older People presents the findings of its associated inquiry into rural housing for older people, and is the fourth in a series of 'HAPPI' (the Housing our Ageing Population Panel for Innovation design criteria) reports covering different aspects of housing and care for older people.

It highlights the growing concern that rapidly increasing numbers of older people in rural communities will face a huge challenge to their independence and wellbeing if their homes are no longer suitable, coupled with the fact that mainstream housing developers 'have no appetite to build homes for older people, and particularly bungalows which take up more land.' It also highlights that much mainstream housing built in rural areas only meets basic accessibility requirements - if set out in local policy - and is not 'age inclusive' in the long term nor designed to the HAPPI principles. The report explains that bungalow developments at key villages can meet the needs of the surrounding rural population without older and retired people having to relocate to large-scale retirement housing / apartment schemes in towns.

Housing Today - Older people like single-floor living and ease of maintenance (October 2019)

This You-Gov survey research confirms that more than seven million people - 60% of over-65s in the UK - would consider moving into a bungalow. Only two million bungalows have ever been built in the UK, with a mere 2,418 new units delivered in 2018, 2% of all new housing delivered last year, while in 1987 bungalows accounted for 15% of new homes. Rising land costs and changing attitudes towards new housing schemes have been factors in the decline.

But the survey carried out for retirement home specialist McCarthy Stone, found that single-storey housing is finding an increasing appeal among the over-65s. The research found that 60% of the over-65s (7.2 million people in the UK) would move to a bungalow, with nearly three quarters (70%) of respondents citing the ease of being able to live on a single level. Ease of maintenance (50%), more appropriate for older people (49%) and space for a garden (44%) are also major factors behind the popularity of bungalows.

John Tonkiss, McCarthy Stone CEO said planning rules had historically limited bungalows' viability, but these should be re-considered in the light of their apparent popularity among the older generation;

- *'Bungalows are increasingly popular amongst older generations and should be a consideration for any drive to build more suitable housing. They are easier to maintain, are built with older people in mind and help maintain independence for longer. Housing like this not only brings a host of health and other benefits to older people, it also helps free up under-utilised family homes for younger generations. This shift can play a major part in helping solve the UK's housing crisis.'*

Retirement Housing policy position paper - Age UK (July 2019)

This policy statement issued by Age UK confirms a number of up-to-date key statistics concerning the older peoples' housing market, reflecting the growing preference for suitable mainstream housing such as bungalows (private sale and leasehold), alongside conventional retirement housing apartments and larger complexes / villages.

It reports that the ability to continue living independently for as long as possible in suitable mainstream housing, is the first choice among older people requiring specialist accommodation, and that there is a shortfall of 400,000 in the number of purpose-built retirement homes for older people in England.

Later Life in the UK 2019 - Age UK

This factsheet provides key up to date statistics on the ageing population and later life in 2019 in the UK. It highlights;

- the UK has an ageing population (ONS 2018)
- there are nearly 12 million (11,989,322) people aged 65 and above in the UK (ONS 2018)
- in 50 years, there are projected to be an additional 8.6 million people aged 65 years and over - an additional population roughly equivalent to the size of London (ONS 2018)
- by 2030, one in five people in the UK (21.8%) will be aged 65 or over, 6.8% will be aged 75+ and 3.2% will be aged 85+ (ONS 2017)
- 6.5 million households in England are headed by someone aged 65 and over - equating to around one-third of all households (ONS 2018)
- 88% of the growth in the number of households between 2016 and 2041 is projected to be in households headed by someone aged 65+ (ONS 2018)
- the number of households headed by someone aged 65+ is projected to increase by 54% by 2041, which will bring the total number of households headed by someone aged 65+ to almost 10 million, whereas the number of households headed by someone under 65 is projected to grow by just 3% (ONS 2018)
- poor quality, poorly appointed, unsuitable, hazardous and incorrectly sized housing can lead to older people having reduced mobility, depression, chronic and acute illness, falls, social isolation, loneliness and depression (House of Commons 2018)
- appropriate housing can keep older people healthy, support them to live independent for longer and reduce the need for social care (House of Commons 2018)
- 93% of people aged 55+ prefer to live in mainstream private housing as owner occupiers or tenants (House of Commons 2018)
- only 5% of people aged 65+ live in specialist housing (all types) (House of Commons 2018)
- 64% of people over-55 choose suitable bungalows or single-storey ground floor properties as their preferred type of housing for retirement however there is a chronic shortage of supply (House of Commons 2018)
- Only 2,579 (net) new bungalows were built in England and Wales in 2017 - 2018, whereas in 1986 - 1987 the number of completions was 28,831 (NHBC 2018)

The State of Ageing in 2019 - Centre for Better Ageing (July 2019)

In common with the up-to-date Age UK research above, this separate independent research highlights common issues and draws similar conclusions. It reaffirms that most people want to continue living independently in their own homes for as long as possible but that due to the unavailability and lack of choice of high quality suitable mainstream accommodation, such as private bungalows, many older households continue to under-occupy over-sized and unsuited housing which is not being released for family occupation.

The research also shows that most over 55 and older people like to feel that they belong and are part of a local community and/or live among likeminded neighbours. This affinity with neighbourhood increases with age and is a further important qualitative factor in older peoples' housing choices and decisions.

Housing and Care for Older People: Defining the Sector - BPF (2020)

This report provides clarity on the spectrum of housing models available to address the needs of an ageing population, considers the limitations in delivery that currently exist, and sets out a number of recommendations that will enable the UK to keep pace with shifting demographics and acute housing need. It concludes that a strategy for delivering purpose-built housing for older people must be a national priority.

The report deals with the types of housing and care for older people, the stock of housing for older people, the current supply of housing for older people, the challenges for housing-with-care the future demand and sets out recommendations. Its key findings show;

- the UK has approximately 475,000 units of housing for older people by the end of 2019;
- the stock is heavily biased (57%) towards public sector rented housing showing an under-supply of housing for private ownership;
- the undersupply of suitable housing for older people is likely to worsen as our population ages - there are currently around 11 million people aged over 65 in England and Wales and by 2029 there will 2.1 million;
- delivery rates are low - an average of 7,600 houses for older people were completed each year between 2015 and 2019, whereas peak annual delivery between 1985 and 1990 was 18,000.

Chain Reaction: the positive impact of specialist retirement housing on the generational divide and first-time buyers - Homes for Later Living (August 2020)

This report by a consortium of UK retirement housing providers, demonstrates that helping more older people who wish to down-size to suitable smaller homes, will not just benefit the older generation and reduce pressure on local authority and NHS social care budgets and help make cost savings, but it will help younger generations in terms of first time buyers and young families looking for a suitable sized homes with gardens. The report identifies the following key statistics:

- Approximately 3 million people in the UK over the age of 65 (or 25 per cent) want to downsize;
- 90% of projected household growth in the coming decades is set to be amongst those aged 65 and over, taking the total number of homes owned by those aged 65 and over from 3.9 million today to at least five million by 2030;
- If all the homeowners over the age of 65 in England who wanted to move were able to do so, they would directly release one million properties back onto the market and free up two million spare bedrooms;
- It is estimated that every retirement property sold (as built by Homes for Later Living members), generates two moves further down the housing chain and 'frees-up' homes at differing stages of the housing ladder for different demographics. A typical retirement scheme consisting of 40 apartments, therefore results in 80 additional moves further down the chain, and approximately two in every three retirement properties, releases a home suitable for a first-time buyer.

- If 30,000 later living properties were built per year (10% of the Government's overall housing target) this would mean 60,000 or more additional house moves are facilitated each year and at least 20,000 first time buyer properties being released into the market.

To this end, the report recommends that the Government should set an explicit target of completing 30,000 retirement properties per year to meet the demand for this type of housing for older people.

UK over 55s demand bungalow renaissance after plummeting build rates (2021)

This research by McCarthy Stone was published on 8th March 2021. It confirms that the number of bungalows being built in the UK has collapsed and continues to fall year-on-year, with just 1,833 bungalows built in the whole of England and Wales in 2020, which is less than 1% of all new homes built. The headline data shows;

- Just 1,833 new bungalows were built in 2020, a fall of 23% compared to 2,384 built in 2019 and 2,418 in 2018, and less than 1% of all new homes built in 2020;
- This is down 80% from the 9,347 bungalows built in 2000;
- This is despite 70% of older people expressing interest in moving to a bungalow, which itself is an increase from 60% in 2019
- This is equal to 8.4 million people and an increase of 1.2 million from 2019
- 71% of people over 65 also consider that more bungalows should be built for older people

The number of older people wishing to live in a bungalow shows a 10% increase in demand since 2019 and highlights the ever-growing appeal of single-storey housing in later life. The appetite for bungalows is explained by multiple factors (see table on following page), including the desire to live on one level (57%), the easier maintenance (43%) and being much better suited to older people (39%) than conventional houses, and the impact of the Covid pandemic and lockdown may have contributed towards older people considering moving to a more suitable property, including bungalows.

Most liked factor / reason to want to live in a bungalow	% of people
Being able to live on one level	57%
They are easier to maintain	43%
They are much better suited to older people	39%
Being able to downsize but maintaining my independence	36%
They provide space for a garden	29%
They are designed and built with older people in mind	29%

Source: McCarthy Stone, Find Out Now 2021

The report confirms that land prices and planning policies have limited the viability of bungalows and favour denser / two storey development instead. John Tonkiss, McCarthy Stone CEO commented:

- *Bungalows are increasingly popular among older generations - they are easier to maintain, are built with older people in mind and help maintain independence for longer given their step free access and easy adaptability, yet bungalow building has collapsed in recent years. The impact of lockdown and Covid-19 is likely leading older people to want to consider living in a more suitable property, and bungalows fit into this category. We urge government to consider new planning rules to improve the viability of developing bungalow development, for example, through the allocation of age-restricted bungalows-only sites, allowing more low rise buildings generally, and addressing the viability issues in planning regulations which prevent new bungalow schemes from coming forward.*



Appeal Decision

Inquiry held on 14–17 and 21–23 January 2025 (inclusive)

Site visits made on 13 and 22 January 2025

by **A McCormack BSc (Hons) MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 14th March 2025

Appeal Ref: APP/A2335/W/24/3350855

Land west of Sea View Drive, Hest Bank, Lancaster, LA2 6BZ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Applethwaite Limited against the decision of Lancaster City Council.
 - The application Ref is 23/01470/FUL.
 - The development proposed is erection of 27 no. specialist bungalows for older people with detached garage and associated access, internal roads, infrastructure, open space, landscaping and parking.
-

Decision

1. The appeal is allowed and planning permission is granted for 27 no. specialist bungalows for older people with detached garage and associated access, internal roads, infrastructure, open space, landscaping and parking at Land West of Sea View Drive, Hest Bank, Lancaster LA2 6BZ in accordance with the terms of application Ref: 23/01470/FUL and subject to the conditions set out in the attached schedule.

Preliminary matters

2. Reason for refusal 5, as set out in the Decision Notice and relating to housing mix and type, was withdrawn by the Council in the light of further evidence provided by the Appellant after the Decision was issued. As a result, the matters relating to this are no longer contested by the Council. However, there remains dispute between the parties in relation to housing need and the weight it is to be given in the planning balance.
3. It is agreed that the Council cannot demonstrate a 5-year housing land supply with the supply, as at 1 April 2023, identified as 2.4 years in the Lancaster Housing Land Supply Statement 2023 [CD7.7]. The Council accepted in the Statement of Common Ground (SoCG) [CD15.1] that this position represented a significant shortfall in housing supply and acknowledged in its Statement of Case [CD14.1] the importance of housing delivery being boosted across the District to address the shortfall. It is in that context that the housing land supply position in Lancaster District is noted and considered in this appeal.
4. The Government published a revised National Planning Policy Framework (NPPF) on 12 December 2024. Accordingly, this appeal has been determined with regard to that latest version of national policy and any subsequent amendments made to it since.
5. The local planning policy history relating to the development plan and the production of the Slyne-with-Hest Neighbourhood Plan (NP) in relation to the site was set out in detail during the appeal. Having regard to these submissions and whilst the planning history may be considered as material to this case, it is my view that the NP and the policies within are to be considered as they currently stand as made. This forms part of the up-to-date local planning policy context that has been applied as the starting point in the determination of this appeal.

6. A number of appeal decisions and judgements were submitted to support the cases of both main parties. I have had regard to these in relation to the appeal, where appropriate and necessary, as material considerations. Where relevant, I refer to them in my Decision.
7. During the Inquiry, the Council published a new Strategic Flood Risk Assessment (SFRA) [ID09 and ID10]. It is agreed between the parties that this assessment complies with the requirements of the Planning Practice Guidance (PPG), that it uses appropriate evidence and that it has been appropriately consulted upon. This latest SFRA has been considered in my determination of the disputed flood risk matters in this appeal.
8. The Council adopted its Climate Emergency Review of the Local Plan (January 2025) on 22 January 2025 which included two revised development plan documents (DPDs). These adopted DPDs are referred to in this Decision and have been considered in determining this appeal, with particular regard to Policy DM30 in relation to sustainable design and construction, water efficiency, materials and waste in new developments and with regard to Conditions 5 and 12 in the attached schedule.
9. I undertook an initial unaccompanied site visit on 13 January 2025, prior to the opening of the Inquiry. This was to familiarise myself with the site and surrounding area. A further, more detailed unaccompanied site visit was undertaken on 22 January 2025, prior to closing submissions and the close of the Inquiry. Both visits were informed and guided by a site visit itinerary [ID20] provided by, and agreed between, the main parties. These visits, and my observations during them, have assisted me and contributed to my overall findings and determination of this appeal.
10. Following the Inquiry, the Government updated the PPG on Green Belt on 27 February 2025. As such, the main parties were given the opportunity to provide written comments on how this update to the PPG impacts upon their respective cases [ID21 and ID22]. These comments have been considered in my determination of this appeal.

Main issues

11. At an earlier stage in the appeal, I identified main issues relating to the effect of the proposal on the openness and purposes of the Green Belt and regarding very special circumstances. However, as the proposal has been found to be not inappropriate development and on Grey Belt land, it is no longer necessary to consider the matters relating to those previously identified main issues. Therefore, the main issues are:
 - 1) Whether the proposal would be inappropriate development in the Green Belt having regard to the NPPF and relevant development plan policies;
 - 2) The effect of the proposal on the character and appearance of the landscape and the surrounding area, including the setting of the Lancaster Canal at Hest Bank;
 - 3) The effect of the proposal on highway safety with particular regard to highway layout and design, the potential conflict between users and the provision of appropriate connectivity to the Lancaster Canal towpath;
 - 4) Whether the proposal would be at risk of surface and ground water flooding and whether a sequential test to demonstrate that the proposal cannot be located in an area at a lower risk of flooding is required. If required, whether the scope of a sequential test should extend beyond the Bolton and Slyne ward boundary; and
12. The weight to be accorded to the proposal's contribution to meeting identified older persons housing needs.

Reasons

13. The appeal concerns an area of land to the west of Sea View Drive, Hest Bank between the Lancaster Canal to the west and existing residential development to the north and east. The

site is a single field of about 2 hectares. It is a clearly defined and well-contained parcel of land, partly enclosed by hedgerows with some small trees present on the Canal bank adjacent to the western boundary of the site. The rear elevations and gardens of adjacent properties to the north and east predominate along those boundaries of the site. The site also slopes downwards from east to west towards the Canal side.

14. Hest Bank is a large village that is contiguous with both Slyne and Bolton-le-Sands. All three villages are identified and defined as separate Sustainable Rural Settlements by Policy SP2 of the Lancaster Local Plan Part 1: Strategic Policies and Land Allocations Development Plan Document 2025 (SPLA DPD 2025) [CD6.1] and inset from the surrounding North Lancashire Green Belt (GB). There is access to local facilities in both Hest Bank and Slyne and to bus stops on Hest Bank Lane within walking distance of the site.
15. The site also lies within the Slyne-with-Hest NP area and its containment and locational sustainability were recognised and reflected in the site's identification as a draft housing allocation within the draft NP. However, I note that this allocation was subsequently removed prior to the NP being confirmed as made.

Inappropriate development in the Green Belt

16. Within the revised NPPF(2024), the concept of Grey Belt land was introduced along with the 'Golden Rules' as set out in NPPF156. Where land and a proposal satisfy all the tests in NPPF155 and 156 and accords with the NPPF Glossary definition, it is considered as Grey Belt. Moreover, where land is assessed as Grey Belt, the scheme proposed can be determined as not inappropriate development in the Green Belt.
17. In relation to NPPF155(a) and the NPPF Glossary definition of Grey Belt, the proposal is not a policy test involving a consideration of housing need or Government statements on the housing crisis, as the Appellant advocates. The test involves an assessment of whether the proposed site *strongly* contributes to Green Belt purposes (a), (b) or (d), as in NPPF143. It is accepted, acknowledged and agreed that only purpose (b) is contested in this case.
18. In light of the evidence, whilst the site is located on the built edge of Hest Bank, it does not make a strong contribution to Green Belt purpose (b), preventing settlements from merging into one another - in this case Hest Bank and Morecambe. It is a self-contained site adjacent to existing development to the north and east that is easily distinguishable visually and physically from the wider countryside. It has a strong connection to the settlement of Hest Bank and does not play a significant role in preventing the visual or physical merging settlements, whether that is between towns or villages.
19. When considered in the context of the whole North Lancaster Green Belt, the site is very small. As such, its contribution to purpose (b) is relatively limited. The Council's Green Belt Review [CD7.1], undertaken in 2016, assessed the performance of sites and groups of sites against the Green Belt purposes. Although the Review has some age now, I note that very little in the Green Belt has changed since then, including around the site. Furthermore, the Green Belt purposes remain the same. Indeed, during the Inquiry, my attention was drawn to the only changes - highlighted on the Green Belt policy map - relating to the removal of land within the strategic gap between Slyne and Lancaster for an allocation to the south of the Bay Gateway bypass (A683) and the local land designation east of Morecambe. As a result, I consider the age of the Green Belt Review not to be a matter of any significant relevance.
20. The assessment of whether the site *strongly* contributes to purpose (b) is accepted as a matter of planning judgement. Nonetheless, consideration must account for several factors and not just in relation to distance or the size of the site. The Appellant accepted that a focus solely upon the percentage reduction of the strategic gap between settlements that the proposal would represent would only be a partial assessment - and it is. To my mind, a limited approach such as that would likely result in the constant promotion of small-scale changes to the Green Belt through development proposals, as the Council has stated.

21. The Council advocated that an assessment of purpose (b) also requires consideration of the perception of the strategic gap between the settlements, including the topography of the land, the visual and physical role in preserving the gap and the relationship between the site and the strategic gap and the urban edge of Hest Bank. In terms of topography, the Council took the view that the site faces away from the existing development on Sea View Drive in Hest Bank and towards Morecambe Bay, across the strategic gap. It has also been argued that a disconnect between the site and Hest Bank would exist due to the site sloping away from the existing development along Sea View Drive and the proposal facing westwards across the strategic gap. However, I find this would not result in the site being disconnected from Hest Bank or a lack of relationship to it more so than to the strategic gap. Nor would it give a visual or physical sense or perception of Hest Bank and Morecambe merging.
22. I acknowledge the principal connection of the site to the urban edge of Hest Bank relates to the rear of existing properties along Sea View Drive and that this presents a perception that the settlement of Hest Bank is on the opposite side of a topographical ridge to the strategic gap along the eastern boundary of the site. However, the properties on Sea View Drive along with those on Sunningdale Crescent to the north of the site and Rushley Drive to the northwest – which are on the opposite side of the Lancaster Canal – all provide a visual connection to the built form of development present in the surrounding area of the site. Furthermore, I find that the perceptual quality of the site, as referenced in the CPRE Tranquillity Study within Appendix H of the Appellant's Landscape Visual Assessment (LVA) [CD1.26] does not connect the site more to the strategic gap to the south and west instead of the urban edge of Hest Bank to the north and east.
23. The Council stated that the Appellant's evidence on the screened Zone of Theoretical Visibility (ZTV) (Figure 1.6, Appendix E CD1.26) showed the site to be visible from large areas of the strategic gap. In my assessment, it is noted that in fact the screened ZTV does not demonstrate this. A few viewpoints show the site not to be visible, or only minimally visible, from much of the strategic gap. Indeed, from my observations on the ground, I found the site to be only partially visible from the railway bridge over the West Coast Main Line (WCML) railway on Marine Drive and would be mostly, if not entirely, screened by trees within the rear garden of 61 Marine Drive when in leaf. Similarly, from vantage points along Rakes Head Lane, west of Rakes Head Bridge (including Viewpoint 9, Figure 1.8, Appendix I, CD1.26) and adjacent to the WCML railway, I noted the site to be only partially visible despite its elevated position, screened by existing intervening hedgerows and trees.
24. The site is also not visible for much of the length of the Canal towpath south of Rakes Head Bridge to Viewpoint 12, as identified on the Inspector Site Visit Itinerary [ID20] provided by the main parties. An exception to this was at a particular point when travelling north from Viewpoint 12, just prior to the Canal turning northwards where the site can be glimpsed between the existing planting on the east bank of the Canal. Viewpoint 10 of the Appellant's LVA [CD1.26] also demonstrated this point and the limited visibility of the site from south of Rakes Head Bridge. Furthermore, the site is not visible from much of the eastern section of Rakes Head Lane (Bridleway BW0131005) and the public right of way (FP0131009) adjacent to Reanes Wood due to the topography of the landscape and existing buildings.
25. In addition, the Appellant cited intervening features that result in the site not strongly, or even moderately, contributing to purpose (b) with a focus on the Lancaster Canal as a boundary. It is noted there is no requirement that a canal must be considered a suitable boundary. That is a matter of judgement. Historically, the Canal has not acted as a boundary since the development of Hest Bank, Slyne and Bolton-le-Sands shows development on either side of it in the local area. Indeed, from what I have read and observed on my visits, it is broadly the case that where development has reached the Canal, it has spread across to both sides. However, to my mind, the development of the site in this case would not necessarily put land west of the Canal, opposite the site, at risk of development. There is nothing substantive before me to specifically suggest this would likely occur. The Canal, in

- this scenario, would act as a strong physical and immovable boundary to the site and any development on it.
26. The Council has maintained its consistent assessment of the site's strong contribution to purpose (b). I do not find any compelling evidence to indicate that the Council has ever held a different view on the site, notwithstanding where the Council has simply referred to the size of the site. Nonetheless, it is clear to me from the evidence and my experience on the ground that the site does not make a strong contribution to purpose (b).
 27. The Appellant's evidence in this regard has largely focused on the size of the site, the strategic gap and the reduction in separation distance between settlements. Having also taken account of all other considerations, I find the specific contribution of the site to purpose (b) to be significantly less than strong. Consequently, the test set out in NPPF155(a) is met.
 28. It is agreed there is a demonstrable unmet need for the type of development proposed and this is therefore not in dispute, as stated in the SoCG [CD15.1] and the Council's Addendum Note to that SoCG [CD15.4]. As such and following my assessment of the evidence on housing need, I find the test at NPPF155(b) is met. Nonetheless, the matter between the parties here concerns the weight given to the identified need in the overall balance. This is a matter of judgement to which I shall return later in this Decision.
 29. In relation to NPPF155(c), there is clear agreement between the parties in the SoCG [CD15.1] that the proposal would be in a sustainable location. Defined as a Rural Sustainable Settlement in Policy SP2 of SPLA DPD 2025, Hest Bank is specifically identified as such. The site is noted to be accessible by foot, cycle and public transport to a range of amenities and facilities within Hest Bank and Slyne village centres, the local area and the wider District including Carnforth, Morecambe and Lancaster. This is confirmed by Tables 4.4 and 4.5 and the 800m and 2km pedestrian catchment map at Plan 5 of the Transport Statement [CD1.34] submitted with the planning application. Furthermore, I find that the proposal would be in a sustainable location, with particular reference to NPPF110 and 115 concerning sustainable transport modes, highway design, safety and suitable access. Therefore, I am satisfied the above sufficiently demonstrates compliance with NPPF155(c).
 30. Whether the proposal meets the requirements of NPPF155(d) is set out in the following paragraphs. In relevance to this appeal, the 'Golden Rules' in NPPF156, identify contributions that major development proposals should make, involving the provision of housing on sites in the Green Belt, subject to a planning application. These relate to affordable housing, necessary improvements to local or national infrastructure and the provision of new or improved existing green spaces which are accessible to the public.
 31. In terms of affordable housing, the parties agree the proposal would make a notable contribution to affordable housing locally, at 15% above the Local Plan target of 30%, as agreed in the Addendum to the SoCG [CD15.4]. This contribution is in accordance with NPPF157 and represents a substantial provision above the policy requirement. From all that is before me, I am satisfied that the affordable housing contribution, as set out and confirmed in the signed Section 106 Agreement [ID19], meets NPPF156(a).
 32. The provision of necessary improvements to infrastructure is dealt with in more detail under highway safety and connectivity. Nonetheless, as I have determined and set out there, I find that the proposal satisfies NPPF156(b).
 33. In my assessment of the evidence presented in this respect, NPPF156(c) is met by the proposal in two ways. Firstly, it would provide accessible green space within the site allowing new residents to have access to good quality green space close to their homes. This provision is directly aligned with NPPF159 and is the primary purpose of NPPF156(c). Secondly, it is noted that the wider public would also have access to the green space within the site through the site management company provisions, as set out within the signed Section 106 Agreement [ID19]. In addition to the green space provided within the overall site

layout to the north of the proposal, there would be a further area of green space in the southwest corner of the site which, whilst identified for surface water drainage or balancing pond use would still provide green space to be experienced within the proposal along with the landscape buffer adjacent to the Canal.

34. For the above reasons, the proposal is determined as not inappropriate development in the Green Belt under NPPF153 as it is Grey Belt land, meeting all the requirements of NPPF155 and 156. In meeting the 'Golden Rules' of the NPPF, it is acknowledged the proposal is to be given at least significant weight in its favour in line with NPPF158. Also, I find there is scope to raise the level of weight in its favour to substantial, given the benefits identified, the national policy position and local housing need and supply situation.

Openness and purposes of the Green Belt and very special circumstances

35. The effect on openness arises only where a site is not considered as Grey Belt land or not inappropriate development in the Green Belt. Given my findings on the proposal as I have set out above, in accordance with the NPPF, an assessment of the effect of the proposal on Green Belt openness and its purposes is not required in this case and therefore it is not necessary for me to undertake such an assessment. For similar reasons, an assessment of whether very special circumstances exist to make the proposal appropriate and acceptable in the Green Belt is also not required and has therefore not been undertaken.
36. Consequently, I conclude that as the site is determined as Grey Belt land and the proposal is not inappropriate development in the Green Belt, the proposal complies with Policy EN4 of SPLA DPD 2025, Policy DM50 of the Climate Emergency Review Development Management DPD 2025 (DM DPD 2025), Policy HE1 of the Slyne-with-Hest NP and the relevant aims and objectives of the NPPF.

Character and appearance of the landscape

37. The parties agreed that both of their landscape and visual assessments considered the same key characteristics of the site and the effect of the proposal on the Landscape Character Area. The Landscape and Visual Impact SoCG [CD15.2] helpfully sets out the differences between the Council and the Appellant on such matters, including the differing methodologies of the assessments undertaken by the respective expert witnesses.

Effect on landscape character

38. The Guidelines for Landscape and Visual Assessment - 3rd Edition (GLVIA3) [CD12.1] and the Technical Guidance Note 2024/01 [CD12.3] require a balancing exercise of the positive and negative effects of a development to reach a conclusion on the overall level of effect. The Council has undertaken this, setting out its conclusions on the level of landscape and visual harm and concluding that the proposal would result in a significant detrimental impact on the Lancaster Canal and its setting and the rural landscape of the site and study area. The effects of the proposal on the local landscape character have been assessed by the Council as significant and would adversely affect the open countryside, rural landscape and setting of the Canal. Furthermore, it is stated that the proposals' setting would be within the Green Belt. The Council's conclusions have been set out plainly and clearly argued in the written and oral evidence submitted to the Inquiry.
39. The Appellant's witness, Mrs Hyslop, stated in evidence that she was not required, as a landscape expert tasked with assessing the impact of the proposal, to come to a conclusive direction of change brought about by the proposal. To my mind, this does not accord with the guidance in GLVIA3 and results in the Appellant not providing the Inquiry with the level of information needed to fully assess and determine the appeal in terms of the landscape and visual effects of the proposal.
40. The Appellant, through the evidence of Mrs Hyslop, provides no weighing up of positive and negative effects of the proposal or reach a conclusion on its overall effect for the most

important area of difference between the parties – impacts on the Canal and its setting and the effect on Landscape Character Area 12a (LCA12a). However, such an assessment is provided relating to other areas of effect. As a result, the lack of assessment on this particular matter creates some uncertainty as to the consistency and objectivity of the Appellant's overall assessment. As such, only limited weight can be given to this evidence. The Councils' assessment, in contrast, is presented and undertaken in an objective manner, well-reasoned, clear and consistent in its findings.

41. Notwithstanding the above observations, I find the proposal to be well-designed and it is evident that professional landscape input has informed the overall footprint and layout of the proposal, thus minimising adverse landscape and visual impact. The proposal has been laid out to minimise impact on landscape features and landscape character as much as possible. This is found through the inclusion of canal-side vegetation and boundary vegetation and minimising hard surfacing, where possible [CD3.15]. It is also noted that the additional planting has been chosen to replicate existing features within the landscape along the Lancaster Canal within the local area, as illustrated within Photo 2.4 of CD14.2, including native scrub vegetation, hedgerows with trees and tree clumps and in accordance with recommendations from NCA31 and LCA12a.
42. From my observations and the evidence, built form is already present within the baseline landscape along the Lancaster Canal within proximity to the canal-side adjacent to the northwest corner of the site (to the rear of properties on Sunningdale Crescent). In my assessment, this has a direct bearing on the appropriateness of development in this particular location. As a result, the Appellant is therefore correct to record that the proposal would provide beneficial landscape effects through the inclusion of appropriate mitigation planting and enhancements to replicate existing landscape features such as canal-side vegetation and enhanced boundary hedgerows. As was explored and identified in evidence, this specific identification of beneficial effects accords with advice from the Landscape Institute provided through the GLVIA Clarification Note [CD12.3].
43. The Council's landscape objections set out in the reason for refusal must be considered in the context of the Council's own recognition that those objections cannot, on their own, be a basis for refusal of the proposal under NPPF11d(ii). Nonetheless, it is my view that any of the harms identified here are not of a significant level, or at a level that is significant enough, to outweigh the benefits of the proposal.
44. The Council's argument on landscape effects heavily emphasised the emergent view at the northwest corner of the site (Appendix F in CD14.6). It is noted that the Council has used broad landscape receptors such as 'open countryside' and 'rural landscape' rather than specific terms such as 'the field', 'hedgerows', 'canal-side vegetation' and 'the Canal and its immediate setting' which more closely align with and reflect the wording of the LCA12a description and recognises how the landscape supports a high proportion of built development [CD12.6]. Furthermore, the Appellant's point that the Council has focused substantially on the Canal and towpath, although neither will be physically affected by the proposal, is noted.
45. Whilst the Appellants' evidence does not reach specific conclusions on a direction of change, I find that the Landscape and Visual Appraisal (LVA) [CD1.26] systematically and methodically sets out the assessment approach undertaken in Mrs Hyslop's evidence for the Appellant. By comparison, the Council's assessment of landscape effects, through Mr Cousins' analysis [CD14.5 and CD14.6] takes a different approach. Whilst clear and consistent in its findings, it provides insufficient detail to reinforce or support the assessment outcomes. The lack of clarity on how geographic extent has been applied to moderate the scale of change, especially within the landscape receptor, does not adequately demonstrate or support the Council's case. Moreover, there is little recognition of the effect of the 20-metre buffer adjacent to the Canal, such that the development itself would form only a small

part of the frame of the view identified in Mr Cousins' Appendix F [CD14.6] – a view taken on the Canal's west bank, adjacent to the northwest corner of the site, looking southeast.

Pedestrian experience on the towpath and bridleway

46. From my experience on site and the evidence, the views when using public rights of way, including the Lancaster Canal towpath, which formed the Council's primary focus, and the bridleway will be transient with receptors experiencing a range of viewing distances, locations, directions and angles towards the site. At Year 15, with mitigation, the proposal would appear as part of the wider development of Slyne-with-Hest for receptors using the Lancaster Canal towpath [CD1.26]. This is due to a number of factors including the presence of the Canal as a clear, delineating feature, the visual connection of the scheme with existing prominent built form on Sea View Drive, the proposed Canal buffer area and the limited visual connection for users of the scheme with the open countryside to the west.
47. The diverse landscape framework proposed [CD3.15] would provide a buffer which would mitigate the visual impact of the existing urban edge of Slyne-with-Hest as well as the edge of the proposed development. The creation of a vegetated canal corridor similar to that which exists to the north of the site - to the rear of properties on Sunningdale Crescent – and to the south of Rakes Head Bridge would increase the perception of rurality by softening and filtering views towards the existing urban edge of Sea View Drive, which is prominent in current views from the Canal towpath.
48. Policy T3 provides a list of expectations for proposed development adjacent to the Canal, including the integration of the waterway corridor and canal environment into the public realm in terms of design and management of the development. The Council has referred to the rear-facing properties adjacent to this feature being harmful and having an adverse effect on the Canal corridor. However, having considered all relevant aspects of the proposal and the content of Policy T3, it is my view that it would not be substantively harmful and would comply with the policy in this regard.
49. Fundamentally the Council's case on visual effects is heavily focused on the emergence of the receptor from the more wooded canal corridor of Hest Bank into the more open location adjacent to the northwest corner of the site. However, in my assessment of the site and its surrounding area, this view is just one location for users of the Canal towpath. The approach excludes the presence of built form close to the Canal – properties on Sunningdale Crescent – and the constrained views to the west due to the large hedgerow adjacent to the west bank of the Canal and its towpath. The approach also does not take account of the 20-metre set-back buffer for built-form from the eastern edge of the Canal which would provide a substantial landscape and visual setting and limit the intrusion of built form from the proposal into the emerging view at that location adjacent to the northwest corner of the site.
50. Users of the bridleway and footpath (Viewpoints 2, 3, 9 and 11 in the Appellant's LVA) [CD1.26] would be even further from the site with intervening topography or vegetation, notably the high hedgerows and existing trees. Moreover, with the additional planting in place, I find the combination of these intervening features and the greater distance from the site would further lessen any visual impacts.
51. The Council's assessment of visual effects from Mr Cousins initially focused on the Year 15 assessment without mitigation. I note in the SoCG [CD15.2] it is agreed that the Landscape Proposals Plan [CD3.15] provides an appropriate level of detail to inform mitigation proposals. Mr Cousins' argument for splitting the position prior to and after mitigation therefore makes little sense when the appropriate method with a landscape mitigation plan is included as part of the assessment process. Furthermore, it is noted that a clear description of the embedded mitigation process – that is the iterative process to minimise landscape and visual harm - is to be provided and included from the outset [CD12.3]. As the SoCG [CD15.2] reveals, once mitigation is properly considered, the dispute between the parties narrows considerably.

52. The crux of the Council's case in terms of character and appearance and landscape is that moderate adverse effects on landscape would result at Year 15, with mitigation included. However, it is my view that the Appellant's conclusions properly reflect how the development would read as part of the settlement once completed and more so at Year 15. Hence, I find Mrs Hyslop's assessed grading of moderate neutral and moderate-minor neutral landscape effects resulting from the proposal to be more accurate and reasoned overall.
53. I have noted the Council's points concerning the adverse impact of the proposal on views from private residences on Sea View Drive and Sea View Close. However, it is well established that the right to a view, particularly from a private viewpoint, is not a planning consideration. As such, the impact of the proposal on such views can have no substantive bearing on the assessment of its appropriateness, acceptability or effect in and of itself.
54. The site has no landscape designation and is situated in a local planning authority area that has many such designations elsewhere. It is also not a valued landscape in accordance with the NPPF. The landscape and visual impacts are of a highly localised nature, noting the limited number of publicly accessible near and distant views into the site. Furthermore, the Council's landscape objections must be viewed in the context of its earlier support for the allocation of the site. It is noted that the position regarding the site in this appeal is exactly as the Strategic Housing and Employment Land Availability Assessment 2018 (SHELAA) [CD7.3] predicted, in that through the careful siting and design of the proposal and with a restriction to single storey buildings, any landscape and visual impacts can be reduced and limited to an acceptable level.
55. In the context of the wider housing crisis and, more pertinently, a significant shortfall in the supply of housing land locally, the Council cannot simply oppose proposed development in edge-of-settlement canal-side locations, particularly where the landscape and visual impacts are so limited. Policies DM29, DM46, T3, NPPF135(c) and 187(b) all support an approach where development should be brought forward where its siting, layout and landscaping are all appropriate for the location. In my assessment, the proposal delivers this and is therefore in accordance with the development plan.
56. Consequently, I conclude that the proposal would have no significant detrimental effect on the character and appearance of the landscape and surrounding area, including the setting of the Lancaster Canal at Hest Bank. Therefore, it accords with Policy T3 of SPLA DPD 2025, Policies DM29 and DM46 of DM DPD 2025 and the aims and objectives of the relevant sections of the NPPF.

Highway safety and connectivity

57. The Council's principal objection to the proposal in terms of highway safety and connectivity concerns the lack of a dedicated footway serving dwellings within the scheme and apparent need for future occupiers to utilise shared surface highway outside the affected properties on 14 of the 27 plots proposed.
58. The starting point on this issue is that the local highway authority (HA) - Lancashire County Council - has confirmed in the Highways SoCG with the Appellant [CD15.3] there is no objection and no highway safety issue with the proposal. As a statutory consultee, the view of the HA must be accorded significance and compelling reasons are required for any departure from that, as per the case referred to concerning *Visao Ltd* [CD11.7].
59. I have carefully considered the Council's concerns in terms of pedestrian access to and from these properties, particularly in the context of the age-restricted nature of the proposal. The principles of shared surfaces are designed to prioritise pedestrian movement over all other vehicular activity within the designated shared highway. As a result, reduced vehicle speeds and vehicles yielding to pedestrians are reasonably to be expected. The concern is that the behavioural activity of highway users may not always adhere to these principles, thus raising the risk of conflict between vehicles and pedestrians. In addition, the lack of dedicated

footways in parts of the scheme, the older-age demographic of intended occupiers of dwellings and potential mobility challenges increase the chance of that conflict.

60. However, I am mindful of the HA's evident, active engagement in the proposal through the design and application process, its review of the Transport Statement (December 2023) [CD1.34] and the submitted proposal. I have also had regard to the confirmation of no objection from the HA recorded in the Council's Officer Report [CD5.1].
61. The guidance in Manual for Streets (MfS) [CD12.2] clearly supports the shared surface approach and sets a focus on lightly trafficked residential streets where traffic levels and vehicle movements are very low. Paragraph 7.2.14 in MfS specifically identifies that, subject to making suitable provision for disabled people, shared surface streets - which are those with no designated or separate footways - work well in situations such as in the proposed scheme. Furthermore, I find the scheme would meet the criteria set out in paragraph 7.2.14 of MfS. Notwithstanding this, I find the detail of the scheme in terms of suitable provisions for disabled or mobility and/or visually impaired people is limited. Mr Wooliscroft, for the Appellant, explained that physical elements such as dropped kerbs could be incorporated and progressed as part of the detailed design process for the construction of the scheme. To ensure this is addressed, I have imposed a condition (23) requiring such details to be supplied to, and approved by, the HA and implemented prior to full occupation of the site.
62. The Appellant contends that distances where no footway is available to occupiers of the proposed properties are relatively short. In my assessment, the furthest direct distance across the shared surface between a proposed dwelling (Plot 19) and a proposed footway is about 40 metres, according to measurements taken from the Landscape Proposals Plan [CD3.15] that was referenced during the Inquiry. Whilst this distance would not be inconsiderable for older people with mobility issues and/or visual impairment, on balance, I find that subject to the approval, provision and maintenance of the highway measures referred to above, as required through condition, and taking account of the HA's clear lack of objection, the proposal would be acceptable in this regard.
63. The lack of dedicated visitor parking throughout the proposal is evident. Noting that the HA is satisfied that the scheme is acceptable in highway safety terms, I have had regard to the Appellant's points that regular visitors to the site would be aware of the environment and drive accordingly. Visitors are likely to include family and friends of residents who, when visiting would likely use dedicated driveways and parking spaces for properties.
64. Other visitors, such as healthcare professionals, may do the same. However, visitors such as delivery drivers and tradespeople are more likely to park larger vehicles (i.e. vans and trucks) on the shared surface highway. In terms of delivery drivers, parking on the highway would be a relatively short-term event. Such drivers are likely to visit regularly and be familiar with the highway and park in safe locations accordingly. Trades vehicles, driven by those perhaps less familiar with the area, may be parked on the highway for a longer period to carry out their work. This will result in a greater likelihood of conflict between all users – including pedestrians - of the highway, which I note is proposed to be narrower than usual, particularly in areas with no dedicated footway.
65. Having considered this concern, whilst potential exists for occasional conflict on the highway, particularly in the shared surface locations, the nature and environment of the proposal would likely ensure the safety of all users would not be fundamentally harmed. Where potential conflict may occur, such circumstances would be short-term and have a relatively minor impact on the highway and occupiers of the proposed dwellings. As such, having regard to all relevant matters raised, including the view of the HA, I find this aspect off the proposal to be acceptable in highway safety terms.

Refuse vehicles

66. The Council's position on refuse vehicles accessing and manoeuvring around the proposed development narrowed during the Inquiry. Whilst the safety concerns of the Council in this regard have been addressed, an issue remains about potential collisions outside of the highway envelope, as the refuse vehicles turn. The Appellant provided a Swept Path Analysis Plan [CD2.8] which demonstrates there will be only slight body overhang of the vehicle outside of the highway extent from the refuse vehicle tracking and no wheel overhang. The Council accepts this aspect is typical of all refuse vehicle tracking in residential developments and acknowledges that the analysis provided is accepted as being safe by the HA [CD15.3]. Accordingly, having considered what is before me on this matter, I am satisfied that the proposal is acceptable in this regard.

Policy T3 – Connection to the Lancaster Canal towpath

67. The Council says the proposal does not comply with Policy T3 of SPLA DPD 2025 as the Appellant has not provided a pedestrian or cycle link from the proposal to the Lancaster Canal to maximise opportunities for health and wellbeing connections to the Canal towpath and access to the wider green infrastructure network. The Council has pointed out that the Appellant made no meaningful enquiries about the provision of a link to shorten the route from the site to the Canal towpath, currently a distance of about 800 metres via Sea View Drive and Rakes Head Lane, to make it more accessible. In addition, the Council argued that the purpose of NPPF155-157 is to ensure the benefits of a proposal are felt by communities, as stated in the Government's Written Ministerial Statement (HCWS48) [CD9.5]. The Council believes the link from the site to the Canal towpath would be a part of this and its provision has not appropriately been considered by the Appellant. The proposal is therefore, in the Council's view, contrary to this Golden Rule (NPPF156(b)).
68. Policy T3(III) refers to improving access to, along and from the waterway *where appropriate*. As a result, this is a very limited policy provision. It does not require the delivery of links, the acquisition of adjacent land outside of a land ownership, nor the acquisition of rights over third-party land particularly where, in this case, the land is not part of the Canal towpath.
69. The Appellant stated in evidence and in Closing [CD15.3 and ID17] that attempts to contact the relevant landowner in writing were made on three separate occasions and none were successful, receiving no response. Mr Love, for the Appellant, set out clearly in evidence the extent of efforts made to explore the deliverability of the link. As a result, the Appellant is unable to acquire the relevant land and therefore cannot carry out the required works over the land. The Appellant has safeguarded land within the site to provide access off the site towards Rakes Head Lane for the future should the adjacent landowner be willing to provide a link. In my view, this is a reasonable step and, given the circumstances, it is all that can reasonably be expected of the Appellant. Furthermore, whilst not ideal, the existing route to the Canal towpath from the site remains. There is, therefore, an alternative route available.
70. For the reasons set out above, Policy T3(III) cannot, in this case, be a basis upon which to refuse the proposal. Due to the presence of an existing alternative route, the Council's request for a link to be provided to the Canal towpath from the site cannot therefore stand as relating to necessary infrastructure for the purposes of NPPF156(b). The new link sought by the Council is not a necessary improvement to local or national infrastructure. Therefore, its provision is not required for compliance with the Golden Rules.

Local highway network

71. The local highways in the area are relatively narrow and I have had regard to concern about an increase in traffic resulting from the proposal, particularly on Hest Bank Lane and adjacent to the local primary school. From the evidence on traffic flows, the Transport Assessment provided by the Appellant, other relevant submissions and noting that the HA has raised no objection to the proposal on any such grounds, I find that the proposal would have no material impact on traffic capacity or highway safety within the local highway network. As such, subject to relevant conditions attached, the proposal would be acceptable.

72. Consequently, I conclude that the proposal would have no substantive adverse effect on highway safety with particular regard to highway layout and design, the potential conflict between users and the provision of appropriate connectivity to the Lancaster Canal towpath. Therefore, it complies with Policy T3 of SPLA DPD 2025, Policies DM8, DM29, DM57, DM60 and DM61 of DM DPD 2025 and the aims and objectives of the NPPF.

Flood risk

73. In the NPPF review in December 2024, the Government made a change at NPPF174 and 175 which makes clear that although an SFRA is the basis for identifying whether a site may be at flood risk, the final decision as to whether a sequential test is required is determined by the existence and result of a site-specific flood risk assessment. This change to the NPPF has the intention of providing a more proportionate approach to flood risk matters, as set out in the notes attached to Q.80 in the NPPF Consultation Response (Q.80) [CD9.27].
74. In its NPPF Statement [CD14.7] and Opening Statement [ID03], the Council focused on NPPF174 on the SFRA and gave very little effect to NPPF175. During the Inquiry, the Council's argument was focused on the pre-December 2024 NPPF175 text and the present PPG text (PPG 7-027), based on the premise that the updated NPPF175 was only applicable for the detailed stage of the assessment. In my view, this approach does not reflect the wording of the current NPPF175, nor the explanatory note relating to Q.80.
75. In contrast, the Appellant's approach still gives effect to PPG 7-027, as currently drafted, as the proposed site has been assessed by the Appellant to be at a low risk of surface water flooding. The Council referred to *Mead Realisations* [CD11.5] and the equal status given to the NPPF and PPG. However, this does not explicitly, or otherwise, require the decision-taker to apply PPG text that has not been updated to reflect the updated NPPF in a manner that is inconsistent with the clear wording of the NPPF.
76. The updated NPPF is the latest expression of national policy. As such, all aspects of the PPG, as national guidance, must be considered in that policy context and regard therefore must be had to the updated NPPF175. It is an unfortunate situation where national guidance is, in effect, awaiting update to align with national policy. Nonetheless, in this situation, I find that current up-to-date policy must take precedence over guidance, particularly where that guidance is expected to be updated shortly to reflect the updated policy.

Limitations of the SFRA and Risk of Surface Water Flooding (RofSW) mapping

77. It has been agreed between the parties that the published caveat to the SFRA plans is typical. Consequently, it is agreed that where the NPPF and PPG refer to SFRA, there is a recognition of the constraints of that data. However, the Council's case on the SFRA does not reflect the clear explanation that the Environment Agency's (EA) RofSW maps have inherent limitations which result in the fact that they cannot be used to undertake a full assessment of risk 'at any scale'. This is clearly set out on every map produced by the EA, including those within ID05, and is confirmed and reproduced at paragraph 4.4.1.2 of the Council's SFRA 2024 [ID09]. As such, and as is shown from the evidence, I find the RofSW to be an inherently high-level starting point not suitable on its own for a full assessment of flood risk at a site-specific level.
78. The SFRA interactive mapping for both the RofSW and future scenarios outputs simply predicts the extent of potential flooding for the 1 in 100-year and 1 in 30-year return period storm events. Therefore, it cannot provide a full or final assessment of risk. Risk must incorporate both the likelihood and the consequences of flood events [ID10]. The interactive mapping captures the likelihood of an event based on the probability of specific rainfall events occurring. However, it cannot determine the consequences of such an event. As a result, the application of such mapping is limited.

79. The Council points to the fact that the new SFRA plans [ID05] show the site to be at risk of future surface water flooding in all tested scenarios. The site also remains at risk of surface water flooding now [CD15.1]. Furthermore, the Council refers to the Appellant's agreement, through Mr Nicholas, that in SFRA terms when one compares the plans in Mr Nicholas' Technical Note 003 [ID11] with the SFRA plans, the access point to the north, the access road to the south and two dwellings to the south of the site (plots 26 and 27) are at risk of surface water flooding in the future. Therefore, the issue between the parties is whether, as a matter of policy, a sequential test is required in those circumstances.
80. NPPF174 makes clear that the SFRA is the basis for the sequential test. In my assessment of the term 'basis' in this context, it is the first step for determining whether a sequential test is required. Therefore, and quite simply, where an SFRA identifies that the site in question is at risk of flooding now and/or in the future from any source of flooding, a sequential test is required, unless a site-specific assessment demonstrates otherwise, as set out in NPPF175. In this case, the latest SFRA (ID09) indicates the site is at risk of flooding now and in the future from surface water. Consequently, in accordance with the NPPF, unless a site-specific flood risk assessment shows otherwise, a sequential test is needed.

Site-specific assessment

81. I have had regard to the Appellant's site-specific assessment [ID11] for current surface water flooding which shows the risk of such flooding is low, using the EA's Hazard Rating. I have also considered the Appellant's further site-specific assessment in respect of future surface water flooding which reaches a similar low risk conclusion. It is noted that the EA Hazard Rating was introduced by DEFRA and the EA in 2005 and is established and recognised as a useful reference in terms of flood risk assessment. Importantly, it is acknowledged that it brings together both the likelihood and consequences of flooding to measure overall risk. As a result, when employed in the Appellant's site-specific assessments, in both the current and future scenarios, the Rating of overall flood risk falls into the "very low hazard" category.
82. There is nothing before me to indicate that the Council disputes any of the calculations, methodology or the overall findings of the Appellant's site-specific flood risk assessments. As such, I conclude that the results provided are agreed. I have also had regard to the two flow routes identified in Figure 2 of the Appellants Technical Note 003 assessment [ID11]. Whilst the southern flow route runs through two proposed properties (plots 26 and 27), I am satisfied the reasoning in the assessment relating to the negligible depths of the routes would have no substantive adverse impact on the level of flood risk relating to the built development proposed. Furthermore, I am satisfied any such impact can be adequately mitigated through the surface water drainage works required through conditions.
83. Whilst a very low risk level of surface water flooding for part of the site now and in the future is concluded in the Appellants' assessment, no area at risk relates to any proposed built development within the site boundary, including access or escape routes. In light of this, and as no other elements on the site, as identified in NPPF175, would be impacted by a risk of flooding from any source, now and in the future, a sequential test is not required.
84. For all the reasons set out above, I conclude that there is no requirement for a sequential test. Moreover, based on the evidence, I find there to be no strong reason to refuse the grant of planning permission under footnote 7 of the NPPF. The site is demonstrated to be only at a low risk of surface water flooding on a site-specific assessment and no land upon which built development is proposed is at risk of flooding now and in the future. As a result, the proposal accords with Policy SP8 of SPLA DPD 2025, Policy DM34 of DM DPD 2025 and the relevant aims and objectives of the NPPF.

Housing need (assessment of weight)

85. The Council has argued there is little in national or local policy that requires a particular weight to be attributed to the need for older persons housing generally or for 'over 55'

housing specifically. It is a matter of planning balance. However, in making that judgement, I must take into consideration the acknowledgement in the PPG of a critical need for older persons housing generally. An assessment must also be based on the agreed need for such housing in the Lancaster District. On that basis, it is noted that the Council gives significant weight to the provision of 'over 55' housing through the proposal.

86. The Appellant, through the evidence of Mr Love, argued for substantial weight to be given to meeting this need. The reasons for this conclude in paragraph 12.19 of Mr Love's evidence [CD13.3] where there is a reliance on the evidence of Mr. Beauchamp for the Appellant [CD13.5] to show a contribution to the unmet need for specialist retirement housing in Slyne-with-Hest Parish. At the Inquiry, Mr Beauchamp accepted that to assess whether there is a need for the proposal, it is necessary to assess whether there is a need for 'over 55' M4(2) bungalows (i.e. for the type of development) and a locational need at Parish level.
87. Mr Beauchamp relied on the Housing in Later Life (HiLL) methodology [CD9.10] as the basis for the conclusions he makes for the Appellant on unmet need. The Council argued this was not a sound basis for evidence on need and should be disregarded and set out reasons for that. Those reasons included that HiLL was published in 2012, and not updated since. This was prior to an amendment to the definition of older persons housing in 2019 to include age-restricted housing. Therefore, it does not assess need for the development type proposed. Furthermore, the Council says HiLL does not include a methodology to assess the specific need for this proposal. It is not Government guidance, it has not been adopted as such and does not reflect the view of Government. In fact, the Council believes that it does quite the opposite [CD9.10, p2]. HiLL is produced by, and reflects the views of, commercial providers of specialist older persons housing. As such, it should not be taken as independent advice.
88. It is noted the Council's position on the need for specialist older persons housing in the Parish has shifted from a clear acknowledgement that there is a need at the application stage to stating in its Statement of Case [CD14.1] and the SoCG [CD15.1] that there is *likely* to be a need arising from the Parish.
89. The proposal qualifies as specialist older persons housing within the definition of both NPPF63, as explained in the NPPF Glossary definition of older people, and the PPG (ID:03-010). It is also acknowledged that the proposal contains elements of age-restricted general market housing as it will exclusively consist of bungalows as a fully age-restricted community. The Appellant's evidence provided by Mr Beauchamp [CD13.5] identified a quantitative need for retirement housing, either age-restricted or sheltered, for 55 additional units for sale and 41 additional units for rent in the Parish.
90. Furthermore, a qualitative need for such housing has been demonstrated within the Appellant's evidence from Mr Love [CD13.3] due to a clear need for contemporary, purpose-built, age-restricted accommodation of the type proposed. This is noted as being in line with the findings of the Older People's Housing Taskforce Report (OPHTR) [CD9.15]. It is noted and accepted there is a significant number of existing bungalows within the local area. However, much of this stock comprises older properties which require some updating, adaptation and renovation to fully meet present day standards for such accommodation.
91. As noted in the PPG [ID:63-004], the future requirement for specialist accommodation for older people may need to be assessed and can be obtained from online toolkits provided by the sector. Although the specific example of HiLL is not given in the PPG, the principle of using such an online resource is endorsed and HiLL clearly meets the PPG's description. Accordingly, I find the use of HiLL to be appropriate and acceptable in determining specialist older persons housing needs.
92. Contrary to the Council's view, I find the estimates identified of minimum need cannot in any way be compromised by the composition of the OPHTR working group. I have had regard to the fact that HiLL was developed in response to the HAPPI2 Inquiry by the All-Party Parliamentary Group on Housing and Care for Older People, and directly supported by

Housing LIN. As a result, I find there to be a strong policy and evidential basis for the use of a prevalence rate-based toolkit, such as HiLL, to assess housing needs. Furthermore, I note that in 2020 HiLL was recognised by the Royal Town Planning Institute (RTPI) as the main such toolkit still available and is the only toolkit for the estimation of overall need included in this way [CD9.12].

93. I note the figures provided by HiLL are cautious. In total, the provision requirements for sheltered, enhanced sheltered and extra care amount to only 245 units of specialist housing per 1,000 aged 75+. It is also acknowledged that the residents of such schemes may be significantly younger and therefore provision is likely to amount to less than that amount.
94. I have had regard to the points made about the definition of provision rates labelled in HiLL and about various terms and definitions including conventional and leasehold sheltered housing and other relevant types of housing. As a result, I am of the view that the same key features are found across all. These are the presence of age-restricted properties, a community of properties of the same type and accessible, adaptable housing. These features are also found in the proposal. As such, I find that the proposal appropriately reflects the type of housing that HiLL was seeking to address.
95. Overall, given my acceptance of the validity of HiLL and the Appellant's evidence regarding its application and findings, it is my assessment that the Appellant has provided a robust and transparent description of a need figure within the Parish which aligns with the broader evidence available. The Appellant, through Mr Beauchamp, has provided full estimates of specialist housing need, by type and tenure at the District and Parish levels, based on HiLL and has acknowledged this as a cautious estimate of minimum need. Furthermore, the Appellant has convincingly set out the many ways in which bungalows meet a real need for older persons accommodation in a qualitative assessment and identified clearly that there is a national and local need for the type and tenure of homes proposed and in this location.
96. For all the above reasons, the Appellant has indicated that the provision of the proposal should attract substantial weight within the planning balance. Given the level and detail of the evidence before me and considering the Council's position and response to this, I find that I agree with the Appellant in terms of the substantial weight their evidence of need should attract. Consequently, this is the weight in favour of the proposal I attribute to the housing need evidence before me in the overall assessment and balancing exercise.

Other matters

97. In addition to the main issues, I have given due consideration to other matters raised by interested parties who oppose the proposal. In many instances, the Appellant has provided written submissions in response to the points raised. Taking this all into account and having reached a view on each matter as material considerations, I have set out my findings below.
98. With regard to access to local services and facilities, the proposal would be a short walking distance from Hest Bank Lane and the bus stops for Service 55 which operates hourly in either direction for Carnforth and Lancaster. I find this to be an accessible and reasonable service for future occupiers of the proposal to use to reach services and facilities locally and District wide using a regular and frequent sustainable mode of public transport.
99. I acknowledge the proposal would result in some inevitably adverse impacts on ecology and biodiversity. However, based on the evidence provided and on balance, I am satisfied the proposal would provide appropriate mitigation measures relating to any adverse impacts in relation to ecology and biodiversity that may arise due to the proposal. Furthermore, appropriate mitigation and enhancements and biodiversity net gain would be provided and secured by the relevant conditions in the schedule attached to this Decision.
100. Concern was raised regarding foul water and storm water drainage capacity at the site. This was with particular reference to the Lancaster Canal being polluted by storm water run-off

were the sustainable urban drainage and permeable road surfaces in the proposed scheme not effectively maintained. A condition is attached to this Decision to ensure that a site-specific lifetime operation and maintenance manual for the surface water drainage system is submitted to, and approved by, the Council and implemented accordingly thereafter. In addition, a legal agreement is to be put in place for a management company to be set up which will maintain the unadopted highway and drainage infrastructure within the proposal. In my view, this will ensure that suitable mitigation against the risk of polluted run-off entering the Canal is in place and operates appropriately.

101. There was also concern that the capacity of the existing foul water pumping station would be overwhelmed by the proposal. For clarity, there is no evidence before me to indicate that this would occur. It is noted in the SoCG [CD15.1] that Lancashire County Council, as lead local flood authority, and United Utilities, as statutory provider, have no objection to the proposal, subject to the relevant conditions set out in the attached schedule. Considering this and having regard to all I have seen on the matter, I find the proposal acceptable in terms of the arrangements identified and agreed for managing surface water and flood water.
102. There was an objection in relation to an impact on views from a private garden, restricting views of the landscape for Sea View Drive residents and I acknowledge these concerns. However, there is no right to a private view in planning terms. It is noted that the proposal has been designed to limit the impact on views from the adjacent properties on Sea View Drive. I have also had regard to the use of planting to assist in softening the appearance of the proposal for neighbouring occupiers. As a result, I conclude that the proposal would be acceptable in this regard.

Planning balance

103. The NPPF recognises the need for a pragmatic and flexible balance to be found on Green Belt policy and sets out a new approach to Green Belt land release where there are significant shortages of housing generally and affordable housing.
104. The site is determined as Grey Belt land, in accordance with the NPPF and all criteria set out in NPPF 155 and 156 are met. The proposal is therefore not inappropriate development in the Green Belt. As such, assessments on the contribution it makes to the openness and function of the Green Belt and whether very special circumstances exist for the development to be considered appropriate are not necessary. There are no footnote 7 policies that provide a strong reason for refusal. Therefore, NPPF11d(ii) is to be applied in the overall planning balance. For clarity, the scale of weight applied in this balancing exercise is as follows: limited; moderate, significant; substantial.
105. The proposal will have limited harm on the character and appearance of the area and the surrounding landscape due to the highly contained nature and physical context of the site. On the basis of the evidence submitted and my overall assessment of the issues, I give the limited harm identified to the character and appearance of the landscape and the setting of the Lancaster Canal at Hest Bank limited weight.
106. In terms of the impact on highway safety and connectivity, the proposal would have a moderate impact. The lack of dedicated footways to properties within the proposal would result in an increase in the level of risk to the safety of users of the shared surface areas. However, the nature of the proposed shared surface scheme, the limited extent of the lack of dedicated footways and the cul-de-sac nature of the proposed layout in those areas leads me to the view that the adverse impacts on safety would be limited. Furthermore, where the proposal does not provide a direct connection to the Canal towpath, I find the impact of this to be limited given that an alternative route, albeit longer, already exists. Therefore, having considered all the above, I give limited weight to the harm identified.
107. Flood risk has been considered in detail and I have had regard to the evidence provided on this matter that has emerged during the Inquiry. Following the findings of the SFRA and the

site-specific flood risk assessment, there is a very low risk of flooding on the site and no land is at risk of flooding now and in the future upon which built development is proposed. As such, I find that the potential risk for flooding at the proposed development is very limited, particularly when taking account of the mitigation proposed. Accordingly, based on the evidence, I attribute limited weight to harm associated with flood risk in this case.

108. With regard to other matters, when considered both individually and cumulatively, and having due regard to the submitted evidence, the mitigation proposed and the conditions attached to this Decision, I find that the overall limited harm that these matters and considerations amount to should be attributed only limited weight against the proposal.
109. The significant benefits of the proposal include the provision of retired and older people's specialist housing in Slyne-with-Hest Parish to assist in meeting the identified local need which the Council has acknowledged and which the Government has emphasised as being of critical need at a national level. This attracts substantial weight in favour of the proposal. The proposal would also bring many health and well-being benefits associated with specialist bungalows for retired and older people for which I give moderate weight. The proposal would also assist in enabling and encouraging downsizing or 'right-sizing' and 'freeing-up' larger housing units to meet wider housing market needs and providing cost savings for social care and health care systems. Significant weight is afforded to this benefit in favour of the proposal.
110. The provision of this development will assist in addressing the limit to meeting such specialist housing need elsewhere outside the Green Belt and in less harmful Green Belt locations in Slyne-with-Hest Parish. Furthermore, it will deliver market housing to help address the significant shortfall in the five-year housing land supply position in Lancaster District. This attracts substantial weight in favour of the proposal in the overall balance.
111. Other key benefits include the 'above policy level' delivery of affordable housing to address the significant shortage of such housing in Lancaster District, for which I also give substantial weight. Pedestrian and cycle connections to Sunningdale Crescent attracts significant weight and, potentially, a connection to the Lancaster Canal towpath which, given the uncertainty of achieving this as it is subject to third party landowner agreement, I give only limited weight to. Benefits of the proposal concerning biodiversity net gain and local economic benefits relating to the construction and operation of the proposal attract moderate weight in favour of the development.
112. Overall, having regard to NPPF11d(ii), I conclude that the limited harms related to the proposal would not significantly and demonstrably outweigh the significant and substantial benefits that would be realised through the delivery of the proposal when assessed against policies of the NPPF and the development plan, taken as a whole. Furthermore, there are no other matters or material considerations which outweigh my findings in the overall balance.

Conditions

113. I have listed the conditions in the attached schedule to reflect the chronological order in they are to be met as the development process progresses rather than as they appeared in the submitted suggested conditions documents [CD16.1 & ID13]. Furthermore, I am satisfied that the conditions attached to this Decision meet the relevant tests set out in NPPF57.
114. In addition to the standard conditions relating to time (1) and approved plans (2), a condition is necessary concerning the minimisation of risks from soil contamination on the site (3) to future occupants and neighbouring occupants together with those to controlled waters and ecological systems. The condition is also required to ensure that site workers are not exposed to unacceptable risks from contamination during construction. This condition is in accordance with Policy DM32.

115. A number of pre-commencement conditions (4 to 12 inclusive) are identified which are necessary, reasonable and justified in making the development hereby permitted acceptable in planning terms.
116. Condition (4) has regard to the provision of site access works and is necessary to ensure that the impacts of the development on highway safety and the operation of the highway network are appropriately mitigated and to ensure the promotion and accessibility of alternative, sustainable transport modes as sought by Policies DM60 and DM61. Condition (5) is necessary to provide the safe operation of the highway and residential amenity during the preparation and construction phases of the development in accordance with Policies DM29, DM30(c) and DM60. Condition (6) is required to ensure that protected species, designated sites and habitats are given adequate protection during construction to accord with Policy DM44. Condition (7) relates to a Canal Protection Method Statement and is necessary to prevent land instability on site and to protect the structural integrity of the Lancaster Canal in line with the Policy T3 in the SPLA DPD 2025.
117. A condition ensuring that satisfactory sustainable drainage facilities are provided to serve the site (8) is necessary, reasonable and in accordance with Paragraphs 181 and 182 of the Framework and Policies DM33 and DM34. Condition (9) requires the submission and approval of a Construction Surface Water Management Plan prior to construction of the proposal. This is necessary and reasonable to ensure the proposal is served by satisfactory arrangements for the disposal of surface water during construction, so it does not pose an undue surface water flood risk on-site and elsewhere. This condition ensures the proposal is in accordance with NPPF181 and Policies DM33 and DM34. Condition (10) has regard to the submission and approval of an Employment and Skills Plan and is required to enhance education, skills and employment opportunities within the District to help achieve sustainable economic development in accordance with Policy DM28.
118. Condition (11) is necessary to ensure that the details of finished floor levels to each dwelling and the finished site levels to all gardens, parking areas, roads and footways are acceptable prior to development commencing. It is also required to ensure that the visual amenity of the area and accessibility of the occupants is acceptable prior to commencement of the development and meet the requirements of Policies DM8 and DM29. Condition (12) is necessary to ensure that the dwellings to be constructed within the approved proposal will not be commenced until a detailed scheme for the sustainable design and water efficiency of each dwelling has been submitted to, and agreed in writing by, the local planning authority. This will ensure the development meets the requirements of Policy DM30a and DMC30b, as adopted within the DM DPD 2025.
119. Condition (13) is required to ensure that impacts on protected and priority species are appropriately mitigated and habitats are enhanced, in accordance with Policy DM44. Condition (14) relates to external details, finishes and materials and is necessary to ensure such features are acceptable in terms of visual amenity in the area and good design prior to the construction of the dwellings, as sought by Policy DM29.
120. Condition (15) deals with external lighting within the proposal and is required to ensure such lighting is acceptable in terms of visual amenity and that nearby habitats are not adversely impacted. Moreover, it is necessary to ensure the lighting is appropriate to meet the needs of the intended occupants of the proposal. This condition ensures the proposal accords with Policies DM8, DM29 and DM44. Condition (16) relates to the submission and approval of an acceptable maintenance regime for the approved landscape scheme and is necessary in the interests of amenity, the design and maintenance of the overall proposal and in terms of providing mitigation and enhancements to biodiversity on the site, in accordance with Policies DM29 and DM44. A condition regarding the provision of appropriate cycle storage (17) is required for the proposal to accord with Policies DM60 and DM61.
121. Conditions (18) and (19) are necessary to ensure that surface water flood risks from development to the future users of the land and neighbouring land are minimised together

with those risks to controlled waters, property and ecological systems, and to ensure the proposal, as constructed, and the sustainable drainage system is subsequently maintained in compliance with the requirements of NPPF181 and 182 and Policies DM33 and DM34. Condition (20) relates to the compliance of the proposal with an Arboricultural Implications Assessment and Method Statement. The condition is necessary to ensure trees and hedges to be retained are adequately protected during the construction phase in the interest of the amenity of the area and the biodiversity of the site in accordance with Policies DM44 and DM45.

122. Condition (21) is necessary to ensure the proposal genuinely meets the needs of intended occupants by providing accessible and adaptable homes to meet future needs and maintain independent living in accordance with Policy DM8. Condition (22) relates to parking provision and turning of vehicles within the approved proposal. It is necessary to ensure the provision of adequate car parking on site and in the interests of highway safety, in accordance with Policies DM60 and DM62. Condition (23) relates to the submission, approval and delivery of a detailed scheme for the suitable provision of shared surface highway features, such as dropped kerbing, to ensure those with disabilities can safely negotiate and move around the proposal hereby permitted. The condition is necessary in the interests of pedestrian and highway safety and to ensure the approved proposal accords with Policies DM60 and DM61.
123. Finally, condition (24) relates to the removal of permitted development rights. Whilst permitted development rights have not been withdrawn in the Green Belt in the General Permitted Development Order (GPDO) in this case I consider there to be a clear justification to do so. This condition is necessary and reasonable to ensure the impact of any extensions to the roofs of the single-storey buildings, any additional hardstanding to the front of the dwellings and any additional or altered boundary treatments can be assessed in terms of the design and impact on the amenity and character of the surrounding area. This is particularly important where the proposal is viewed from public rights of way and the Canal towpath, given the elevated position of the site. The condition is also required to ensure that the proposal accords with Policy DM29.

Conclusion

124. For the reasons given, having had due regard to all other matters raised and subject to the conditions set out in the attached schedule, I conclude that the appeal should be allowed and planning permission for the proposed development be granted.

A McCormack

INSPECTOR

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Inquiry Documents (ID):

ID01	Suggested Policy EN6 modification: Green Belt boundary adjustment relative to appeal site
ID02	Appellant's Opening Submissions
ID03	Lancaster City Council's Opening Statement
ID04	Level 1 - Strategic Flood Risk Assessment Draft Report (January 2025): Appendix D: Surface Water Climate Change Modelling
ID05	SFRA Draft Report (January 2025) - Surface Water Flood Risk Maps: 30-year event (+35% Climate Change Allowance) 30-year event (+45% Climate Change Allowance) 100-year event (+35% Climate Change Allowance) 100-year event (+50% Climate Change Allowance)
ID06	Part One DPD SPLA CERLP Adopted draft version
ID07	Part Two DPD DM CERLP Adopted draft version
ID08	EAC 'Age Exclusive Housing' Definition
ID09	Level 1 Strategic Flood Risk Assessment Report (January 2025)
ID10	Level 1 Strategic Flood Risk Assessment Report (January 2025) Appendices A to J
ID11	Surface Water Flood Risk Future Scenarios - Technical Note 003 of Richard Nicholas – 20 January 2025
ID12	' <i>What is the Risk of Flooding from Surface Water?</i> ' Map, Environment Agency (April 2019)
ID13	Updated (Tracked Changed) Schedule of Suggested Conditions following Round Table Session (22 January 2025)
ID14	Updated draft S106 Agreement document to reflect public access to on-site public open space provision and revised open space contribution
ID15	Revised Calculation for off-site POS contribution for the proposed scheme (as per Table D.3 - Appendix D of the Development Management DPD)
ID16	Council's Closing Submission
ID17	Appellant's Closing Submission
ID18	Appellant's Comments on Council's Closing Submission
ID19	Signed and Sealed Final S106 Agreement document (signed, sealed and received on Tuesday 28 January 2025).
ID20	Site Visit Itinerary and suggested route plan for the Inspector
ID21	Council's Statement on Update to PPG on Green Belt (10 March 2025)
ID22	Appellant's Submission on Update to PPG on Green Belt (10 March 2025)
ID23	Appellant's Rebuttal to the Council's Statement on Update to PPG on Green Belt (12 March 2025)

SCHEDULE OF CONDITIONS

- 1) The development to which this permission relates must be started not later than the expiration of 2 years beginning with the date of this permission.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans:
 - 23-164-I01-Rev A: Location Plan
 - 3655-F01 D: Proposed Site Access Arrangement Plan
 - 23-164-P01-Rev B: Proposed Site Layout Plan
 - 23-164-P07-Rev B: Proposed Affordable Housing Layout Plan
 - 23-164-P02-Rev B: Proposed External Materials Plan
 - 23-164-P03-Rev B: Proposed Boundary Treatments Plan
 - 23-164-P04-Rev B: Proposed Refuse Management Layout Plan
 - 23-164-P06-Rev B: Proposed EV Charging Layout Plan
 - 12605-LUC-DR-1000 Rev P04: Landscape Proposals Plan
 - HT-AB-01: Proposed House Type A - Vertical Boarding (B) Floor Plans and Elevations
 - HT-AR-01: Proposed House Type A - Tile Hanging (T) Floor Plans and Elevations
 - HT-BB-01: Proposed House Type B - Vertical Boarding (B) Floor Plans and Elevations
 - HT-BR-01: Proposed House Type B - Tile Hanging (T) Floor Plans and Elevations
 - HT-CB-01: Proposed House Type C - Vertical Boarding (B) Floor Plans and Elevations
 - HT-CR-01: Proposed House Type C - Tile Hanging (T) Floor Plans and Elevations
 - HT-DB-01: Proposed House Type D - Vertical Boarding (B) Floor Plans and Elevations
 - HT-DR-01: Proposed House Type D - Tile Hanging (T) Floor Plans and Elevations
 - HT-SG-01: Proposed Single Garage Detail Floor Plans and Elevations
- 3) No soil or soil forming materials derived inside or outside the boundary of the application site shall be used or brought onto, or applied anywhere on the site unless and until;
 - (a) The source of the material has been confirmed, documented and assessed for risks of contamination.
 - (b) The material has been sampled and analysed for contamination in accordance with a methodology submitted to, and approved in writing by, the local planning authority. The methodology shall include the sampling frequency, testing schedules, criteria against which the analytical results will be assessed (as determined by risk assessment), and source material information.
 - (c) Following conclusion of sampling and analysis, confirmation and process validation evidence has been submitted to, and approved in writing by, the local planning authority.
- 4) No development or site preparation/clearance shall commence until a scheme for the construction of the site access and the off-site works of highway improvement has been submitted to, and approved in writing by, the Local Planning Authority. The submitted scheme shall include, but is not limited to, the following:
 - (a) Site access including: Pedestrian link to Sunningdale Crescent;
Provision of tactile paving.
 - (b) Off-site highway works: Upgrade of 2no. bus stops on Hest Bank Lane to quality standard;
Pedestrian footway provision on Sunningdale Crescent.
 - (c) A timetable for implementation.

The works shall be carried out in accordance with the approved details and the approved timescale.
- 5) No development or site preparation/clearance shall commence until a Construction Management Plan (CMP) or Construction Method Statement (CMS) has been submitted to, and approved in writing by the local planning authority. The approved plan / statement shall provide:
 - 24 Hour emergency contact number.
 - Details of the parking of vehicles of site operatives and visitors.
 - Details of loading and unloading of plant and materials.
 - Arrangements for turning of vehicles within the site.

- Swept path analysis showing access for the largest vehicles regularly accessing the site and measures to ensure adequate space is available and maintained, including any necessary temporary traffic management measures.
- Measures to protect vulnerable road users (pedestrians and cyclists).
- The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate.
- Wheel washing facilities Measures to deal with dirt, debris, mud or loose material deposited on the highway as a result of construction.
- Measures to control the emission of dust and dirt during construction.
- Details of a scheme for recycling/disposing of waste resulting from demolition and construction works to meet the requirements of policy DM30c.
- Construction vehicle routing.
- Delivery and construction working hours.

The approved Construction Management Plan or Construction Method Statement shall be adhered to throughout the construction period for the development.

- 6) No development or site preparation/clearance shall commence until a construction environmental management plan (CEMP: biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.
- (a) Risk assessment of potentially damaging construction activities.
 - (b) Identification of "biodiversity protection zones".
 - (c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
 - (d) The location and timing of sensitive works to avoid harm to biodiversity features and protected species.
 - (e) The times during construction when specialist ecologists need to be present on site to oversee works.
 - (f) Responsible persons and lines of communication.
 - (g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
 - (h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period in accordance with the approved details.

- 7) Prior to the commencement of works relating to the proposed attenuation basin, a Canal Protection Method Statement, detailing measures to demonstrate how the stability of the bank and risk of seepage from the canal will be addressed during the works on site and including protection measures that will be put in place and provided, shall be submitted to, and approved in writing by, the Local Planning Authority. Works on site shall thereafter be carried out in accordance with the approved details. This shall be informed by cross-sectional drawings showing the works in relation to the canal. The works shall be carried out in accordance with the approved details.
- 8) No development or site preparation/clearance shall commence until a detailed, final surface water sustainable drainage strategy for the site has been submitted to, and approved in writing by, the Local Planning Authority. The detailed surface water sustainable drainage strategy shall be based upon the site-specific flood risk assessment and indicative surface water sustainable drainage strategy submitted (LRD31541, Issue 3, January 2024, Sutcliffe) and sustainable drainage principles and requirements set out in the National Planning Policy Framework, Planning Practice Guidance and Defra Technical Standards for Sustainable Drainage Systems. No surface water shall be allowed to discharge to the public foul sewer(s), directly or indirectly. The details of the drainage strategy to be submitted for approval shall include, as a minimum:
- (a) Sustainable drainage calculations for peak flow control and volume control for the:
 - i. 100% (1 in 1-year) annual exceedance probability event;
 - ii. 3.3% (1 in 30-year) annual exceedance probability event + 45% climate change allowance, with an allowance for urban creep;
 - iii. 1% (1 in 100-year) annual exceedance probability event + 50% climate change allowance, with an allowance for urban creep.
 - (b) Final sustainable drainage plans appropriately labelled to include, as a minimum:

- i. Site plan showing all permeable and impermeable areas that contribute to the drainage network either directly or indirectly, including surface water flows from outside the curtilage as necessary.
- ii. Sustainable drainage system layout showing all pipe and structure references, dimensions and design levels.
- iii. Details of all sustainable drainage components, including landscape drawings showing topography and slope gradient, as appropriate.
- iv. Drainage plan showing flood water exceedance routes in accordance with DEFRA Technical Standards for Sustainable Drainage Systems.
- v. Finished Floor Levels (FFL) in AOD with adjacent ground levels for all sides of each building and connecting cover levels to confirm minimum 150mm+ difference in FFL.
- vi. Details of proposals to collect and mitigate surface water runoff from the development boundary.
- vii. Measures taken to manage the quality of the surface water runoff to prevent pollution, protect groundwater and surface waters, and delivers suitably clean water to sustainable drainage components.

- (c) Evidence that a free-flowing outfall can be achieved. If this is not possible, evidence of a surcharged outfall applied to the sustainable drainage calculations will be required.

The sustainable drainage strategy shall be implemented in accordance with the approved details.

- 9) No development or site preparation/clearance shall commence until a Construction Surface Water Management Plan, detailing how surface water and stormwater will be managed on the site during construction, including demolition and site clearance operations, has been submitted to and approved in writing by the Local Planning Authority. The details of the plan to be submitted for approval shall include method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include for each phase, as a minimum:
- (a) Measures taken to ensure surface water flows are retained on-site during the construction phase(s), including temporary drainage systems, and, if surface water flows are to be discharged, they are done so at a restricted rate that must not exceed the equivalent greenfield runoff rate from the site.
 - (b) Measures taken to prevent siltation and pollutants from the site entering any receiving groundwater and/or surface waters, including watercourses, with reference to published guidance.

The plan shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction.

- 10) No development shall commence until an Employment and Skills Plan (ESP) has been submitted to, and agreed in writing by, the local planning authority. The ESP shall include:
- Targets in accordance with the benchmarks in the Council's Employment and Skills Plan Supplementary Planning Document for construction career advice events, employment, training and apprenticeships during demolition / site clearance, construction and fitout phases of development;
 - Method statement setting out how and when the above targets will be achieved;
 - Details of arrangements for monitoring and evaluating the ESP.

The approved ESP shall be adhered to throughout the construction phase of the development. Prior to no less than 50% of the approved dwellings being practically complete an Interim Report evidencing compliance with the approved ESP shall be submitted to and agreed in writing by the local planning authority. If the Interim Report does not evidence such compliance, then a scheme of remedial measures to address and mitigate any noncompliance shall be incorporated into the Interim Report. Construction of the remaining parts of the development shall be carried out in accordance with the approved ESP and, where relevant, the approved remedial measures set out in the Interim Report. A final report evidencing compliance with the approved ESP and remedial measures in the Interim Report (where relevant) shall be submitted to, and approved in writing by, the local planning authority prior to final occupation of the development.

- 11) No development shall commence until the final finished floor levels of each dwelling and the finished site levels to all gardens, parking areas, roads and footways, including details of any retaining features, have been submitted to and agreed in writing by the local planning authority. The development shall be carried out in accordance with the approved detail.

- 12) Before the construction of any dwellings on site, a detailed scheme for the sustainable design and water efficiency of each dwelling shall be submitted to, and agreed in writing by, the local planning authority. The scheme shall ensure the development meets the requirements of policy DM30a and DM30b of the Development Management DPD (CERLP adopted 22 January 2025) and shall include details of the retention and maintenance of any identified renewable technology forming part of the approved scheme. The development shall be carried out in accordance with the agreed details.
- 13) No development above slab level of any building shall commence until details of the following ecology mitigation and enhancement measures have been submitted to, and approved in writing by, the Local Planning Authority:
- Details of new roosting provision for bats at the site and their timescale for implementation;
 - Details of new provision for nesting birds at the site and their timescale for implementation;
 - Details of measures for the maintenance of habitat connectivity by the accommodation of gaps beneath fence lines for the movement of hedgehog (Priority Species) and amphibians between gardens and between the site and the wider area, and the timescale for implementation; and
 - Details of the design of the attenuation basin to demonstrate that it provides appropriate habitat for amphibians.

The development shall be carried out in accordance with the approved details and retained as such at all times thereafter.

- 14) Notwithstanding the details shown on the approved plans, no development above slab level of any building shall commence until the following details and samples have been submitted to, and approved in writing by, the Local Planning Authority:
- External finishes to the walls of the dwellings and garages.
 - External finishes to the roofs of the dwellings and garages.
 - Eaves, verge, ridge and rainwater goods details.
 - Details of windows and doors including amount to be recessed from the outer face of the wall.
 - All external surfacing materials.
 - All boundary treatments.
 - Details of the shared external seating area.

The development shall be carried out in accordance with the approved details prior to the occupation of the associated dwelling/ plot.

- 15) No development above slab level of any building shall commence until precise details of all permanent external lighting associated with the development has been submitted to, and agreed in writing by, the Local Planning Authority. The development shall be carried out in accordance with the approved details, prior to the first occupation of the development, unless an alternative phased timescale is first submitted to, and agreed in writing by, the Local Planning Authority.
- 16) No development above slab level shall commence until details of the maintenance regime of the approved Landscape Proposals Plan [Drawing No:12605-LUC-DR-1--- Rev P04] have been submitted to, and approved in writing by, the Local Planning Authority. The approved scheme shall be implemented in the first planting season following completion of the development, or following first occupation/use, whichever is the earlier, and maintained at all times thereafter in accordance with the approved maintenance regime.
- 17) Prior to first occupation of each dwelling, covered and secure cycle storage facilities shall be provided for each dwelling in accordance with a scheme that shall first be submitted to, and approved in writing by, the Local Planning Authority. The approved cycle storage shall be retained in accordance with the approved details at all times thereafter.
- 18) The occupation of the development shall not be permitted until a site-specific Operation and Maintenance Manual for the lifetime of the development, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved in writing by the Local Planning Authority. The details of the manual to be submitted for approval shall include, as a minimum:
- (a) A timetable for its implementation;
 - (b) Details of the maintenance, operational and access requirement for all SuDS components and connecting drainage structures;

- (c) Pro-forma to allow the recording of each inspection and maintenance activity, as well as allowing any faults to be recorded and actions taken to rectify issues;
- (d) The arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme in perpetuity;
- (e) Details of financial management including arrangements for the replacement of major components at the end of the manufacturer's recommended design life;
- (f) Details of whom to contact if pollution is seen in the system or if it is not working correctly; and
- (g) Means of access for maintenance and easements.

Thereafter the drainage system shall be retained, managed, and maintained in accordance with the approved details.

- 19) The occupation of the development shall not be permitted until a site-specific verification report, pertaining to the surface water sustainable drainage system, and prepared by a suitably competent person, has been submitted to and approved in writing by the Local Planning Authority. The verification report must, as a minimum, demonstrate that the surface water sustainable drainage system has been constructed in accordance with the approved drawing(s) (or detail any minor variations) and is fit for purpose. The report shall contain information and evidence, including photographs, of details and locations (including national grid references) of critical drainage infrastructure (including inlets, outlets, and control structures) and full as-built drawings. The scheme shall thereafter be maintained in perpetuity.
- 20) The development hereby permitted shall be carried out in accordance with the submitted Arboricultural Implications Assessment and Method Statement (Revision C) and associated Tree Protection Plan 6580.03-C. In particular, the approved protection measures being fully implemented prior to any equipment, machinery or materials being brought onto site, retained in situ for the duration of the works, and only removed once the development is complete and all machinery and works material removed from the site.,
- 21) The development hereby approved shall be constructed in full accordance with Building Regulations Part M4(2) (accessible and adaptable dwellings) and shall be retained as such at all times thereafter.
- 22) The parking provision and turning, where appropriate, associated with each residential unit shall be provided in full before occupation of that residential unit. Thereafter the approved parking provision shall be kept available for the parking of cars at all times.
- 23) A detailed scheme of measures providing appropriate shared surface highway elements, such as dropped kerbing, to assist those with disabilities, including mobility and visibility issues, that is to be applied throughout the proposed scheme shall be submitted to, and approved in writing by, the local highway authority. The approved scheme is to be completed in full prior to the occupation of all dwellings within the development. Thereafter, these elements shall be retained and maintained for the lifetime of the development.
- 24) Notwithstanding the provisions of the Town and County (General Permitted Development) Order 2015 (or any Order revoking and reenacting that Order), no development under Classes B and F (where it is between the principle elevations of the property and a highway) of Part 1, and Class A of Part 2, Schedule 2 of that Order, shall be carried out without the express planning permission of the local planning authority.

END OF SCHEDULE

LAND EAST AND WEST OF WHITTLE-LE-WOODS

DEVELOPMENT STATEMENT
FEBRUARY 2023



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About Applethwaite

Applethwaite is an award-winning SME house builder operating in Central Lancashire. It is the homebuilding division of the Eric Wright Group of healthcare, commercial property, engineering and construction businesses. Owned by the Eric Wright Charitable Trust, its philosophy is a 'commercially focused business with a social purpose' based on the principles of sustained employment and local community well-being.

In this context, Applethwaite has become an unparalleled developer of high-quality traditional bungalows for retired and older people over the age of 55 which mainstream house builders do not provide. Its bungalows are built to Part M4(2) Accessible and Adaptable Homes building regulation standards and qualify as specialist market housing for older people as defined in the Planning Practice Guidance (ID: 63-010-20190626). Its developments range mostly between 20 and 50 no. bungalows in sustainable locations within and on the edge of desirable towns and large villages.

Applethwaite bungalows are bought by retired and older people who are typically homeowners wishing to continue living in their own home and maintaining independent and active lifestyles but wanting single-level living and to 'down-size' (right-size). They consequently require space for visiting family and grandchildren; home working; leisure pursuits; pets; a private garden; storage and a garage, as well as room for a carer if and when needed. These needs are not met by the serviced-apartment retirement living model and 'pepper-potted' bungalows on mixed housing estates seldom offer the peace of mind and quality of life provided by exclusive bungalow community developments.

The ethos of Applethwaite bungalows is fully aligned with Government policy to widen housing choice for retired and older people (as defined in the NPPF glossary) so that they are able to continue living safely, securely, comfortably and independently in their own homes for as long as possible.

1 Introduction

Land East and West of Whittle-le-Woods in Chorley borough is a distinct sustainable opportunity to provide medium-scale development of high-quality age-restricted specialist bungalows for retired and older people which meet building regulations Part M4(2) Accessible and Adaptable Dwellings standards. The land forms two separate parcels, Site A and Site B, each adjoining the settlement boundary to the east and west, and is controlled by Applethwaite Ltd.

This Development Statement has been prepared to demonstrate the suitability and deliverability of the land to the east and west of Whittle-le-Woods for age-restricted specialist bungalow development and to propose it for allocation in the emerging Central Lancashire Local Plan 2023 to 2038. The two land parcels comprise Site A of 4.8 hectares which is adjacent to the southwest settlement boundary of Whittle-le-Woods and Site B of 4.7 hectares which is adjacent to the southeast. Both parcels are currently within the Green Belt adjoining the urban area but are moderate, contained and logical additions to the settlement. Site A was put forward in the Call for Sites (ref. CLCFS00456b) in November 2019 but Site B is a new opportunity. Please see diagram 5.1 adjacent for site locations.

This document explains the merit of the development opportunity at east and west of Whittle-le-Woods for bungalows for retired and older people and demonstrates that both areas of land are suitable, feasible and deliverable allocations. It provides the following information:

- A description of Site A and Site B and their development context
- A review of strategic planning policy including the spatial context of Sites A and B; their contribution to Green Belt purposes; and, the critical quantitative and qualitative need for retirement and specialist housing for older people in Chorley and Central Lancashire
- An analysis of the constraints and opportunities for development at each site
- A concept development framework and illustrative masterplan for Site A and Site B
- An assessment of sustainable development principles for each site including 'Building for a Healthy Life' and accessibility to community facilities and services
- A review of the technical considerations for each site
- Confirmation that each site will be a deliverable allocation and a summary of their key benefits.



Diagram 3.1

2 Site & Surroundings Context Plan

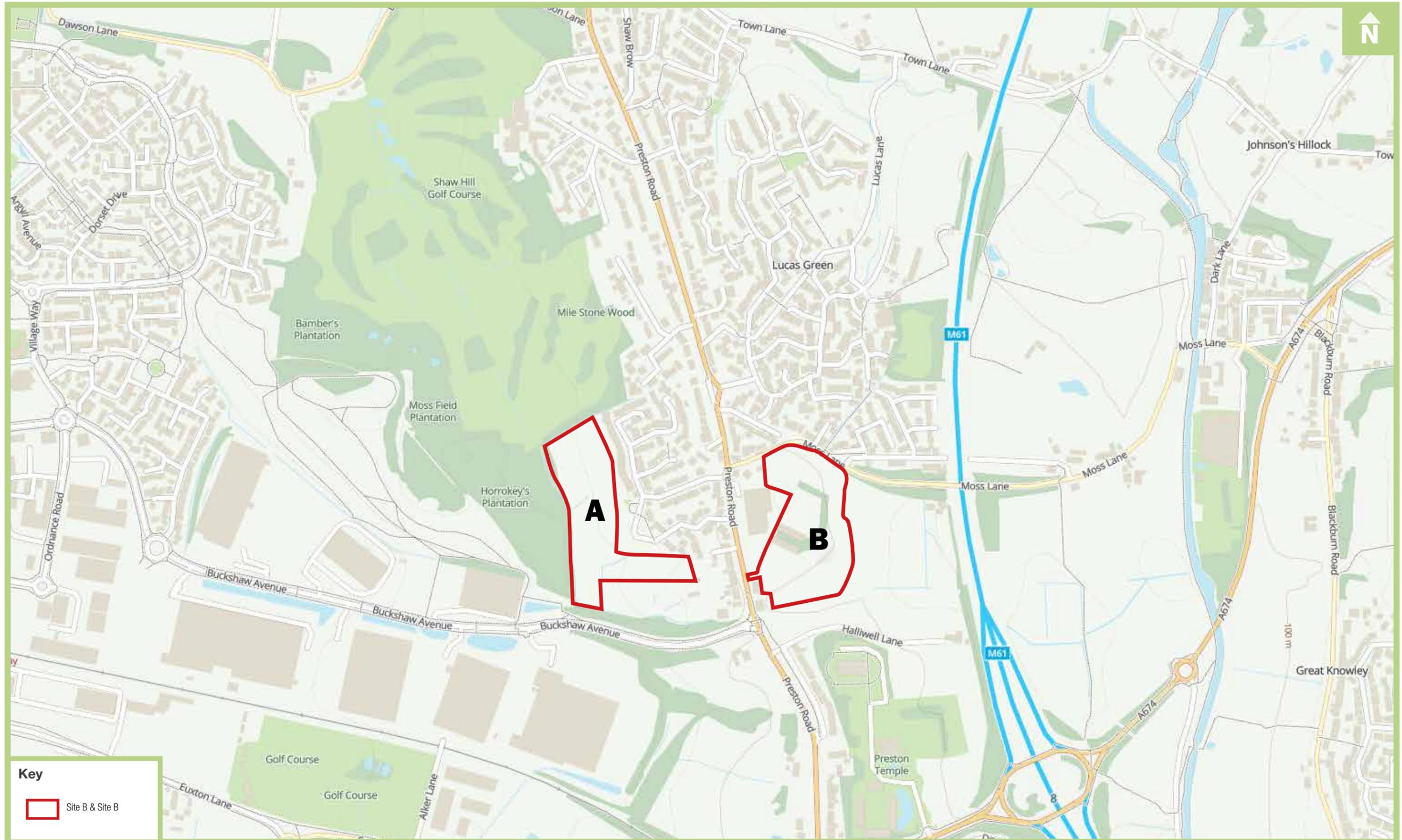


Diagram 4.1

Site & Surroundings

Site A

Site A is located on the west side of Whittle-le-Woods. It is a sloping L-shape area of land of approximately 4.8 hectares (11.7 acres) comprising three fields separated by hedgerows and trees with access from Foxglove Drive. It is bordered by housing development along Foxglove Drive, and associated public open space and a children's play area, on its eastern boundary; countryside, woodland crossed by informal footpaths, and Buckshaw Village further to the west; Shaw Hill golf course to the north; and, commercial development along Buckshaw Avenue further to the south.

It is a highly sustainable location and has walking and cycling access to a range of community facilities and services in Whittle-le-Woods. Foxglove Drive is accessed from Preston Road (A6) which connects to M61 Junction 8 1.3 km to the south and M6 Junction 29 / M65 Junction 2 7.5 km to the north. There are also bus stops 220 metres from the site on Preston Road (A6) which is a high-frequency bus route with up to five services per hour to Chorley, Leyland, Preston and other town and city centres. The site is also 1.8 km from Buckshaw Parkway railway station.



View of Site A from Foxglove Drive

Site B

Site B is located on the east side of Whittle-le-Woods. It is a sloping, irregularly-shaped area of land of approximately 4.7 hectares (11.6 acres) comprising two fields separated by hedgerows and trees with access from Moss Lane. It is bordered by housing development along Moss Lane to the north; commercial and housing development along Preston Road (A6) to the west; and, countryside to the east and south with the M61 and urban area of Chorley beyond. The site also includes two poultry hatcheries.

Like Site A, it is a highly sustainable location and has walking and cycling access to a range of community facilities and services in Whittle-le-Woods. Moss Lane is accessed from Preston Road (A6) which connects to M61 Junction 8 1.3 km to the south and M6 Junction 29 / M65 Junction 2 7.5 km to the north. There are also bus stops 130 metres from the site on Preston Road (A6) which is a high-frequency bus route with up to five services per hour to Chorley, Leyland, Preston and other town and city centres. The site is also 2.2 km from Buckshaw Parkway railway station.



View of housing on Moss Lane facing Site B

Landscape and Visual Context

Site A

Diagram 8.1 shows the context of Site A and the viewpoint locations of the surrounding photographs. The site is divided into three fields separated by trees and remnant hedgerows. The landform in the northern field is a shallow west-facing slope and a generally flat area on the western side alongside Euxton Brook. The central area is mostly flat and the narrower southern field is the most pronounced slope. None of the fields contain any internal features such as freestanding trees and ponds.

The site is within the Cuerden / Euxton landscape character area (Lancashire County Council Landscape Character Assessment 2000) and defined as 'pastoral land including trees and hedgerows influenced by surrounding housing and urban development' in terms of its location on the developed western edge of Whittle-le-Woods and largely urban context.

The site is well contained and only visible within a very limited geographical area. Higher ground, woodland and tree belts to the north, west and south prevent close range and distant views from public roads, vantage points and Buckshaw Village to the west and there are no public footpaths in this area. The site can only be seen from Foxglove Drive and adjacent houses, and from Shaw Hill golf course.



Diagram 6.1

Site A Photographs



View towards the site from Buckshaw Avenue.



View towards the site from Buckshaw Avenue.



Proposed access location on Foxglove Drive.



View of the south part of the site.



View looking north across the site.



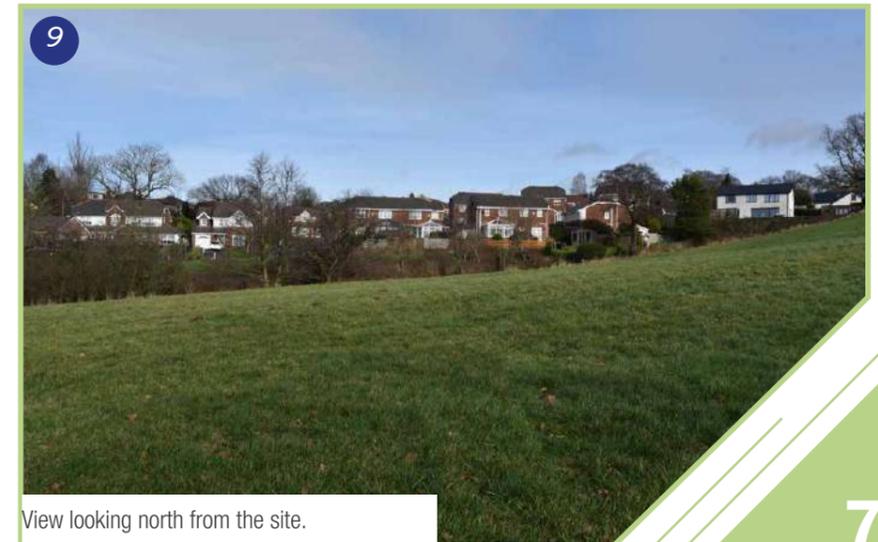
View looking north across the site.



View looking south across the site.



View looking west across the site.



View looking north from the site.

Landscape and Visual Context

Site B

Diagram 9.1 shows the context of Site B and the viewpoint locations of the surrounding photographs. The site is formed from a single large field with boundary trees and hedgerows and a belt of trees encircling the middle part which also contains two poultry hatching agricultural buildings. The landform is the eastern part of a circular hill with shallow north-facing, east-facing and south-facing slopes and a generally flat area along the southern boundary. None of the site contains any internal features such as freestanding trees and ponds.

The site is within the Samlesbury / Withnell Fold landscape character area (Lancashire County Council Landscape Character Assessment 2000) and defined as 'pastoral land including trees and hedgerows influenced by surrounding housing and urban development' in terms of its location on the developed eastern edge of Whittle-le-Woods and largely urban context.

Although elevated, the part of the site in which development is proposed is well screened and only visible within a limited geographical area. The site is screened by higher ground, large commercial buildings and houses from much of Preston Road (A6) to the west and only views of the southern slope (which is not proposed to be developed) is visible from the south. The northern part of the site is partly screened by mature trees and hedgerows from Moss Lane and there are no available short-range public views from the west due to the M61 and tree screening. The site can only be seen from Moss Lane and adjacent houses.

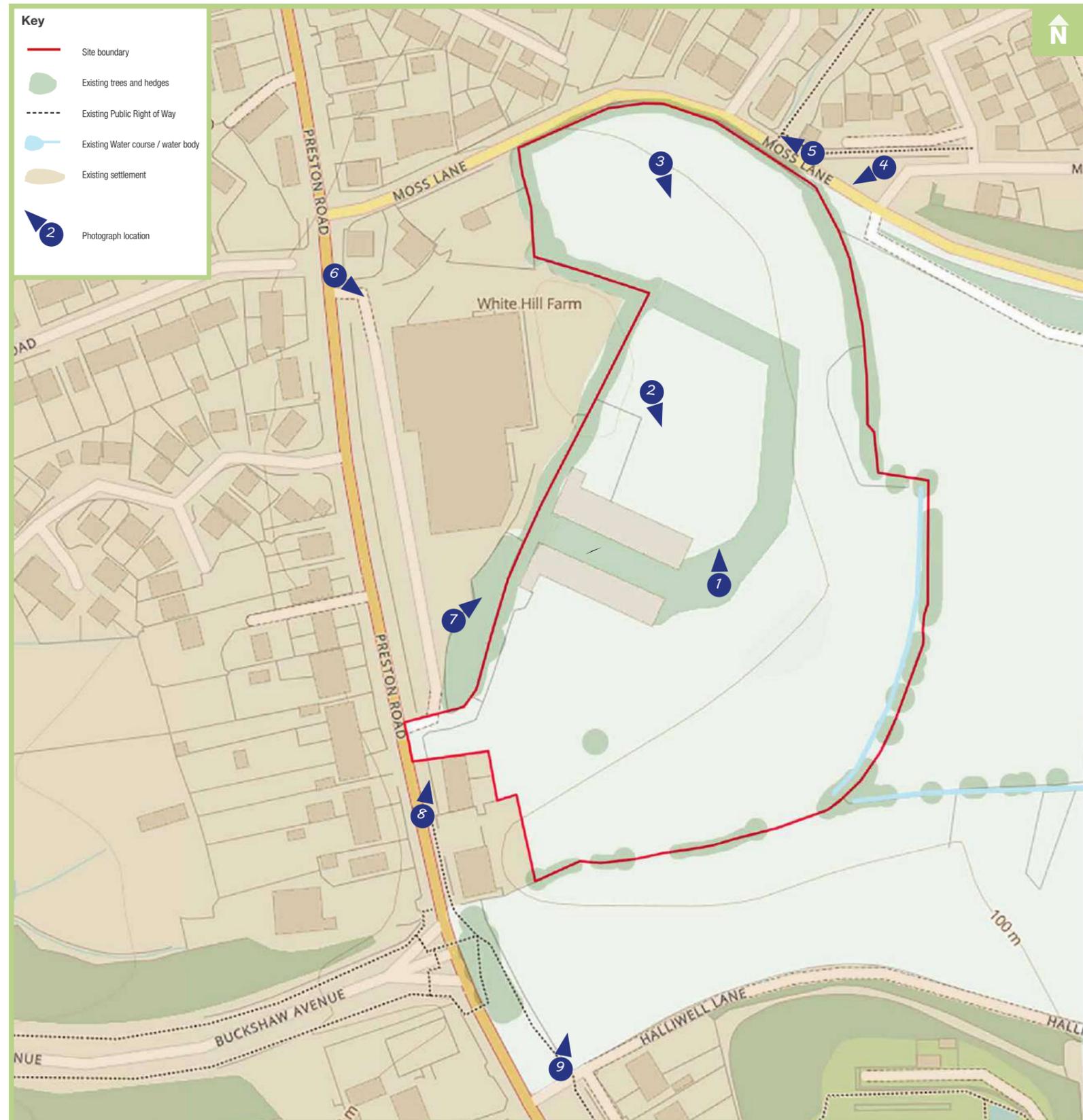


Diagram 8.1

Site B Photographs



View looking north from the site to Moss Lane.



View looking south from the site to Chorley.



View looking south across the site.



Moss Lane looking west.



Proposed access location on Moss Lane.



View of site concealed from Preston Road (A6).



View of the poultry hatchery on the site.



View of site from Preston Road (A6).



View of the site looking north from Halliwell Lane.

3 Planning Policy

The opportunity to include the land east and west of Whittle-le-Woods in the emerging Central Lancashire Local Plan 2023 to 2038 as an allocation for high-quality age-restricted specialist bungalows for retired and older people is sustainable development, in accordance with the relevant parts of the National Planning Policy Framework 2021 (NPPF 21) and Planning Practice Guidance, and is aligned with the adopted and emerging spatial development strategy for Chorley and Central Lancashire.

National Planning Policy

The NPPF 2021 provides the framework for local development plans. The following parts are relevant to the development of land east and west of Whittle-le-Woods for bungalows for retired and older people:

- Chapter 2 - Achieving sustainable development: sustainable development must achieve social, economic and environmental objectives and benefits (paragraph 8):
- Chapter 5 - Delivering a sufficient supply of homes: significantly boosting the amount and variety of housing where it is needed (paragraph 60) meeting the housing needs of different groups in society including older people and providing different types, sizes and tenures of houses (paragraph 62)
- Chapter 8 - Promoting healthy and safe communities: achieving healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles (paragraph 92)
- Chapter 12 - Achieving well-designed places: development should function well and add quality to an area; be sympathetic to local character; have a strong sense of place; optimise land use; and create safe, inclusive and accessible places and which promote health and well-being (paragraph 130)
- Chapter 13 - Protecting Green Belt land: the impact of

removing land from Green Belt can be offset by compensatory improvements to environmental quality and accessibility of remaining Green Belt (paragraph 142) Green Belt land should be put to beneficial use including opportunities for access; sport and recreation; and landscape, visual amenity and biodiversity enhancement (paragraph 145)

- Chapter 15 - Conserving and enhancing the natural environment: development should help enhance the natural and local environment and achieve biodiversity net gain (paragraphs 179 and 180)

Local Planning Policy

The Central Lancashire Core Strategy (2012) and Chorley Local Plan (2015) require growth to be accommodated in the most sustainable way. They focus development in the main centres of the Preston/South Ribble Urban Area, Leyland and Chorley, and the strategic sites and smaller settlements in between. Whittle-le-Woods is within this north/south urban corridor and is defined as an Urban Local Service Centre where ‘some growth and investment will be encouraged to help meet housing and employment needs’.

Notwithstanding its current location within Green Belt adjoining the urban area, the development of land east and west of Whittle-le-Woods for age-restricted specialist bungalows for retired and older people aligns with the spatial strategy and is in scale with the size and character of Whittle-le-Woods in the settlement hierarchy.

The proposed development masterplan is also informed by wider policy requirements as follows:

- maintaining the width of the Area of Separation between Whittle-le-Woods and Chorley, and notwithstanding the prevention of merger achieved by Green Belt

- protecting landscape character and integrating with the settlement edge
- accommodating clusters of development within and around trees, hedgerows and watercourses with no adverse impacts
- keeping the southern parts of the land undeveloped and open to make beneficial and improved compensatory use of retained Green Belt; provide natural open space for informal recreation, dog walking and community well-being; and, achieve biodiversity net gain and habitat creation.

Emerging Central Lancashire Local Plan

The new local plan for Central Lancashire covering the period 2023 to 2038 is being prepared and a Regulation 18 part one Preferred Option version containing strategic policies and site allocations was published for consultation in December 2022. This continues to promote sustainable development by focusing growth mainly in and around urban areas to reduce travel demand, make best use of existing infrastructure, maximise accessibility to services and facilities, and reduce greenhouse gas emissions.

Whittle-le-Woods continues to be classed as a District Centre, which is a Tier 3 settlement in the five-tier hierarchy, where ‘moderate growth and investment’ will be directed to ‘sites within and adjacent to the settlement boundary’ to help meet housing and employment needs.

Notwithstanding its current location within Green Belt adjoining the urban area, the development of land east and west of Whittle-le-Woods for age-restricted specialist bungalows for retired and older people aligns with the emerging spatial strategy and is in scale with the size and character of Whittle-le-Woods in the settlement hierarchy.

Older Persons Housing Needs

A key part of the emerging local plan is the need for new development to create a balanced housing market to ensure that the specific housing requirements of different groups in society are met in accordance with national policy. A much increased amount; a better quality; and, a wider choice, range and greater diversity of specialist housing designed specifically for older people is needed across Central Lancashire and most prolifically in Chorley and South Ribble.

The NPPF Annex 2 Glossary defines older people as:

People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing can encompass accessible, adaptable general needs housing through to the full range of retirement and specialist housing for those with care and support needs.

The Planning Practice Guidance (PPG - 63-001-20190626) explains why it is important to plan for older peoples' housing needs and that the need to provide housing for older people is critical. People are living longer and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. The PPG recommends that the following are considered in an assessment of older persons' housing needs:

- The future need for specialist accommodation (including but not restricted to age-restricted general market housing, retirement living or sheltered accommodation, Extra Care or housing with care), broken down by type and tenure
- The need for care in residential care and nursing homes (C2)
- The need for co-housing communities
- The role of general housing and in particular bungalows and homes that can be adapted to meet a change in needs.

The additional emphasis given to meeting older peoples' housing needs is also made clear in the 2022 draft NPPF (currently published for consultation) where paragraph 63 confirms that older peoples' needs includes retirement housing, housing with care and care homes.

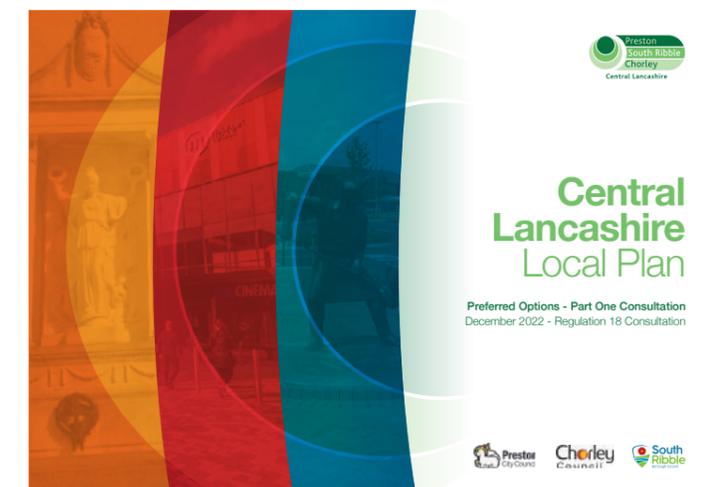
The development of land east and west of Whittle-le-Woods for age-restricted specialist bungalows for retired and older people is fully aligned with these objectives.

The current Central Lancashire Core Strategy and Chorley Local Plan do not contain any policies concerning how older peoples' housing needs will be addressed. The emerging local plan rectifies this and is underpinned by a detailed evidence base comprising the Central Lancashire Housing Study (September 2022) and Housing Need and Demand Assessment (August 2022) specific to Chorley. This evidence confirms:

- The Central Lancashire population is ageing and the number of people aged 65+ has increased by 40% (equivalent to 20,000 additional people) since 2001
- By 2038 the number of people aged 65+ is expected to increase by almost 10,000 and the number of households headed by someone aged 65+ is expected to increase by 40%
- 2021 household survey data shows that 50% of older people want to remain living in their current and/or own home with help and support when needed
- 2021 household survey data shows that 58% of older people planning to move require a property with fewer bedrooms and 32% require a property with the same number of bedrooms or more
- The present housing stock in Chorley comprises 78% houses, 9% flats and 13% bungalows and is mismatched to older peoples' needs and aspirations

- Older persons housing is not a commercially competitive product and bungalow development can be financially challenging which is fuelling the housing crisis and gulf between general needs housing and full residential care with little provision in the middle
- The health and lifestyles of older people and their housing needs differ greatly, ranging from accessible and adaptable general needs housing to specialist housing with high levels of care and support
- There is a clear need for a broader, more-diverse housing offer for older people and the need for greater supply across Chorley Borough is recognised

Converting these requirements into policy in the emerging Local Plan, there is a need for 771 additional homes for older people by 2038 which includes sheltered/retirement housing, Extra Care, co-housing and residential care, and based on the assessment of additional needs and longer-term demographics, all new dwellings should be built to Part M4(2) Accessible and Adaptable housing standards, and including specialist bungalows and level access accommodation, and 6% of all new dwellings should be built to Part M4(3) Wheelchair Accessible housing standards.



Planning Policy - Green Belt

The land east and west of Whittle-le-Woods is currently located in Green Belt adjoining the east and west boundary of the Whittle-le-Woods urban area.

The NPPF 2021 defines five purposes of Green Belt:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The emerging Central Lancashire Local Plan 2023 to 2038 evidence base includes the Open Land Belt Designations Study: Green Belt Assessment (October 2022). This is a high-level assessment of the strategic contribution made by land currently within the Green Belt to purposes and follows the usual convention of a parcel-by-parcel assessment. As a high-level study it acknowledges (paragraphs 3.5 and 3.12) that:

- Although the study introduces the concept of Green Belt harm, that is the impact of Green Belt release on the purposes of the designation, it does not draw conclusions on the harm of releasing specific site options or recommend what land could be released for development. This requires both a finer-grained scale of Green Belt analysis and the consideration of a wider range of sustainability factors which the Councils will take into account in reaching a conclusion as to whether there are exceptional circumstances to justify the release of Green Belt land; and,
- To provide meaningful ratings for harm to the Green Belt purposes requires a finer grain of analysis than is appropriate for a strategic study. The following assessment of Site A and

Site B comprising the land east and west of Whittle-le-Woods therefore takes the findings of the strategic study into account, together with the finer-grain assessment commissioned by Applethwaite (as part of the landscape and visual appraisal) to assess the contribution of each site to Green Belt purposes and thereby inform the proposed land allocations for Green Belt release and concept designs put forward in this Development Statement. Only Purposes 1, 2 and 3 are assessed as neither site contributes to Purpose 4 and all Green Belt land in Central Lancashire is considered to make an equal contribution to Purpose 5.

Site A

This is included in the high-level strategic Green Belt Assessment evidence base as a very small southern part of Parcel P17 which is a large linear extending north to south between the inset Whittle-le-Woods and the inset Buckshaw Village and Clayton-le-Woods urban areas. It notes that the parcel is “almost entirely contained by the built up area and therefore lacks connectivity to the wider Green Belt” and that the gap between Whittle-le-Woods and Buckshaw Village is fragile. Parcel P19 is also relevant which comprises the developed area of the Buckshaw Village Strategic Site per Policy HS1 of the adopted Chorley Local Plan 2015 and follows the boundary of its former designation as Previously Developed Site in Green Belt. Parcel P19 is fully developed with housing and commercial (B8) uses and makes no contribution to Green Belt openness and purposes.

1. To check unrestricted sprawl

Site B is contained by the adjoining urban area along Foxglove Drive to the east and is defined by permanent and defensible boundaries marked by topography, dense woodland and tree lines which can be further strengthened and reinforced. The removal of the proposed net development area from the Green Belt will not therefore result in the unrestricted sprawl

of Whittle-le-Woods nor weaken the integrity of the remaining Green Belt and prevent it from continuing to fulfil this purpose, and will instead relate-well to the adjoining inset area of Whittle-le-Woods.

2. To prevent neighbouring towns merging into one another

Whilst the gross area Site A extends into the gaps and Areas of Separation between i) Whittle-le-Woods and Chorley and ii) Whittle-le-Woods and Buckshaw Village, the proposed development masterplan shows that the net development area is purposely contained to the northern part of the site such that no new development extends further south than the line of the southern settlement boundary for Whittle-le-Woods to the west of Preston Road (A6). The southern parts of Site A will remain open and undeveloped and there will be no narrowing of the separation between Whittle-le-Woods and Chorley, and thereby no harm to this purpose as a result of the proposed development. There is some reduction of the gap between Whittle-le-Woods and Buckshaw Village, taking account of the fully developed Parcel P19, but a gap is maintained and development does not result in coalescence.

3. To assist in safeguarding the countryside from encroachment

Development will cause some encroachment into the countryside but the degree of harm is low as the extent of loss relative to the retained countryside in the wider Green Belt Parcel P17 extending north is very limited; the undeveloped area of Site A will be retained as Green Belt and can be enhanced and continue to function as countryside (but not in agricultural use); and, its proposed limited development is not harmful to landscape character and visual amenity due to its urbanised surrounding context and urban influences, such that it is not representative of truly open countryside, its visual containment and its separation from areas of extensive countryside.

Green Belt Appraisal

Key

- Inset urban area
- Parcel P19
- Green Belt Parcels
- Site A & Site B net development areas
- A6
- M61

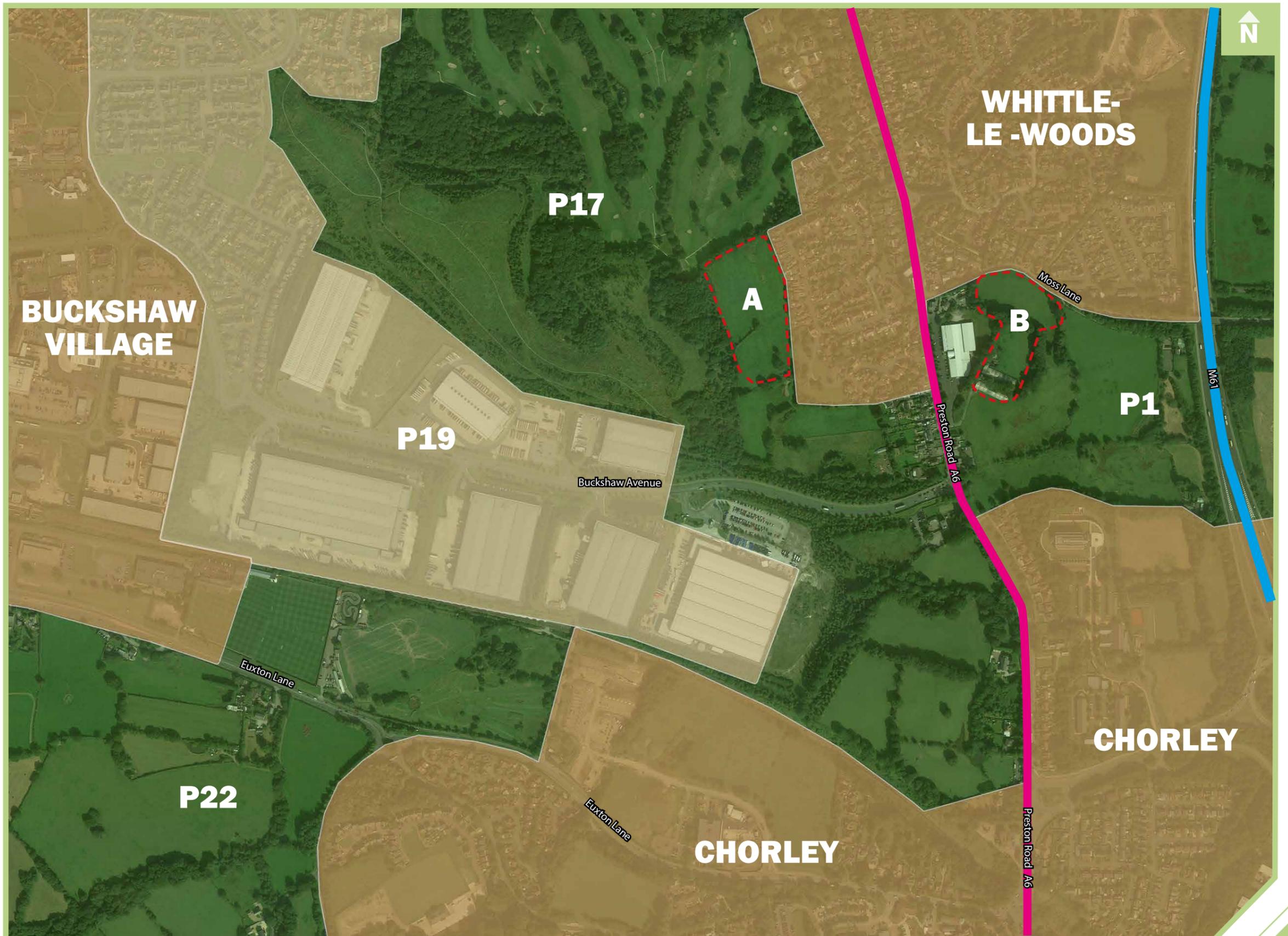


Diagram 13.1

Planning Policy - Green Belt

Site B

This is included in the high-level strategic Green Belt Assessment evidence base as the western part of Parcel P1 which is an irregular parcel mainly focussed on land east of the M61 motorway. It notes that “the M61 is a strong boundary feature which creates strong distinction between the east of the parcel and the inset area of Whittle-le-Woods” to which Site B is adjacent and that “any eastward expansion of Whittle-le-Woods beyond the M61 would constitute significant sprawl of the built up area.” It notes that the distinction between the Green Belt and urban area is weakest in the western part of the parcel as “this area is only separated from the inset urban area by Moss Lane.”

It highlights the need to preserve the narrow gap (north to south) between Whittle-le-Woods and Chorley and that the contribution of the parcel to assisting the safeguarding of the countryside from encroachment relates mainly to the eastern part of the parcel.

1. To check unrestricted sprawl

Site B is surrounded and contained by the adjoining urban area along Moss Lane to the north and washed-over development along Preston Road (A6) to the west, and is defined by permanent and defensible boundaries marked by the poultry hatchery buildings and tree lines which can be further strengthened and reinforced. The removal of the proposed net development area from the Green Belt will not therefore result in the unrestricted sprawl of Whittle-le-Woods nor weaken the integrity of the remaining Green Belt and prevent it from continuing to fulfil this purpose, and will instead relate-well to, and round-off, the adjoining inset area of Whittle-le-Woods.

2. To prevent neighbouring towns merging into one another

Whilst the gross area Site B extends into the gap and Area of Separation between Whittle-le-Woods and Chorley, the proposed development masterplan shows that the net development area is purposely contained to the northern part of the site such that no new development extends further south than the footprint of the poultry hatchery buildings and the line of the southern settlement boundary for Whittle-le-Woods to the west of Preston Road (A6). The southern parts of Site B will remain open and undeveloped and there will be no narrowing of the separation between Whittle-le-Woods and Chorley, and thereby no harm to this purpose as a result of the proposed development.

3. To assist in safeguarding the countryside from encroachment

Development will cause some encroachment into the countryside but the degree of harm is low as the extent of loss relative to the retained countryside in the wider Green Belt vicinity is very limited; the undeveloped area of Site B will be retained as Green Belt and can be enhanced and continue to function as countryside (but not in agricultural use); the site already contains built development; and, its proposed limited development is not harmful to landscape character and visual amenity due to its urbanised surrounding context and urban influences, such that it is not representative of truly open countryside, its visual containment and its separation from areas of extensive countryside.



Retained Greenbelt at Site A



Retained Greenbelt at Site B

Green Belt



Retained Greenbelt at Site B - View south towards Chorley



Retained Greenbelt at Site B - View south towards Chorley

Enhancing retained Green Belt

The NPPF 2021 explains that:

Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (paragraph 145)
The Planning Practice Guidance (ID 64-002-20190722) also elaborates on NPPF 2021 paragraph 145 in setting out ways in which the impact of removing land from Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses supporting landscape, biodiversity or recreational evidence to inform appropriate compensatory improvements including:

- new or enhanced green infrastructure
- woodland planting
- landscape and visual enhancements (beyond impact mitigation)
- improvements to biodiversity, habitat connectivity and natural capital
- new or enhanced walking and cycle routes
- improved access to new, enhanced or existing recreational and playing field provision

The proposed development masterplan shows how the retained Green Belt land, remaining open and undeveloped, within Site A and Site B provides a significant opportunity to create a variety of environmental and social enhancements for the benefit of the local community in Whittle-le-Woods. These include:

- provision of new areas of public open space for informal recreation and leisure use
- provision of opportunities for community health and well-being (e.g. community orchards and outdoor exercise / trim-trail activities)
- new footpath links to form routes and connections between proposed and existing housing areas and local services and bus stops in Whittle-le-Woods
- landscape enhancements including new tree and hedge planting
- new biodiversity and habitat creation including species rich grassland and ponds

4 Development Proposal Site A

Constraints & Opportunities

North: To the north the site is bound by existing trees and hedges, an existing water course and Shaw Hill Golf Club sits beyond the existing trees and hedges.

East: In the east the site boundary is defined by residential properties on Foxglove Drive, Honeysuckle Close, Lupin Close, Bluebell Close and Lea Road with those on Preston Road beyond. There is also an area of green space off Foxglove Drive which houses an existing sub station and play ground.

South: The southern site boundary is defined by existing trees and hedges with Buckshaw Avenue beyond. Beyond this are large industrial units.

West: The western boundary is defined by existing trees, Mossfield Nature Reserve with more large industrial buildings and residential properties found in Buckshaw Village beyond.

Topography and drainage

The topographical survey shows that the site slopes down from 96.95 metres Above Ordnance Datum (m AOD) in the south-east to 75.25m AOD in the west.

Public Rights of Way

There is a are no public footpaths or rights of way through or abutting the site. There are a series of public footpaths to the west which run from Buckshaw Avenue up to the south of the golf course through the nature reserve and to the west to Old Worden Avenue



Diagram 16.1

Development Proposal Site B

Constraints & Opportunities

Site boundaries

North: To the north the site is bound by properties on Moss Lane with further dwellings found off Springside Gardens, New Moss Lane, Lingwell Close and Olive Close further beyond.

East: In the east the site boundary is defined by existing trees and hedges, there is a field beyond this tree belt with the M61 motorway beyond.

South: To the south there is a public house 'The Sea View' with Halliwell Lane and Preston Temple beyond.

West: The western boundary is defined by existing trees with Doorway to Value homewear shop and Preston Road beyond.

Topography and drainage

The topographical survey shows that the site slopes from 110.63 metres Above Ordnance Datum (m AOD) in the west to 94.32m AOD in the east.

Public Rights of Way

There is a are no public footpaths or rights of way through or abutting the site. However there is a public footpath to the north off Moss Lane.



Diagram 17.1

Site A Concept Design

It is proposed to have outward facing development onto a new access road and shared surface streets, with bungalows orientated in such a way as to maintain the areas urban grain and to respect the existing properties on Foxglove Drive, Lead Road, Bluebell Close, Lupin Close and Honeysuckle Close. Access will be taken off Foxglove Drive, there will be shared surface streets for some properties within the development.

A large area of green space is proposed to the south of the site in retained green belt along with the retention of many existing trees and hedges and scope for footpath link. The green space will hold a potential community space/area. Pedestrian links to Foxglove Drive will allow for easy access to bus stops found to the east on Preston Road.



Diagram 18.1

Site B Concept Design

Similar to the principles at Site A, it is proposed to have outward facing development onto a new access road which will be taken off Moss Lane. Dwellings will be orientated in such a way as to maintain the areas urban grain and to respect the existing properties on Moss Lane and Preston Road. There will be shared surface streets for some properties within the development.

There will be a large area of green space in retained green belt to the south within which a pedestrian access will link the site to the bus stops on Preston Road. Proposed bungalows will mainly be in the area currently used for poultry hatcheries, houses in this area will front out on to the green space and have long reaching views to Healey Nab and Great Hill.



Illustrative Masterplan Site A

- 7 Primary access taken from Foxglove Drive.
- 2 Existing trees retained into the development proposals. The trees and proposed arrival green will provide a welcoming vista into the development and will create a nodal area helping occupants and visitors navigate around the development.
- 3 Proposed community orchard will create an amenity space for new and existing residents. A newly formed pedestrian access will create a high level of pedestrian permeability into this important green space area.
- 4 Proposed bungalows will front out onto new access road and also look out over the green space to the south providing natural surveillance over to the green space and pedestrian routes.
- 5 Careful consideration given to interface distance with existing houses. Distances will be set in accordance with Chorley Borough Council's spacing standards.
- 6 This central northern development area will prioritise frontages onto key routes to avoid presenting blank elevations with the street.
- 7 Bungalows will face out of the development overlooking Shaw Hill Golf Course. A new pedestrian route will run around the northern and western edges.
- 8 Bungalows face out of the development and served off a small cul-de-sac. These bungalows will overlook the newly formed pedestrian link.
- 9 Yield is approximately 55 no. bungalows.



Diagram 20.1



Illustrative Masterplan Site B

1 Main access route taken from Moss Lane. Bungalows will face out and overlook this important arrival route, creating a welcoming and safe environment.

2 Bungalows will face out of the development overlooking Moss Lane and set back behind a soft landscaped edge. The existing hedgerow will be retained forming a mature boundary to the development and filtering views into and out of the development.

3 Limited number of bungalows served off a private drive overlook the existing mature trees and newly formed green space area. This small amenity green space will be well overlooked. This distinct area will create an easily recognisable feature upon arrival into the development. This area could also provide a community feature.

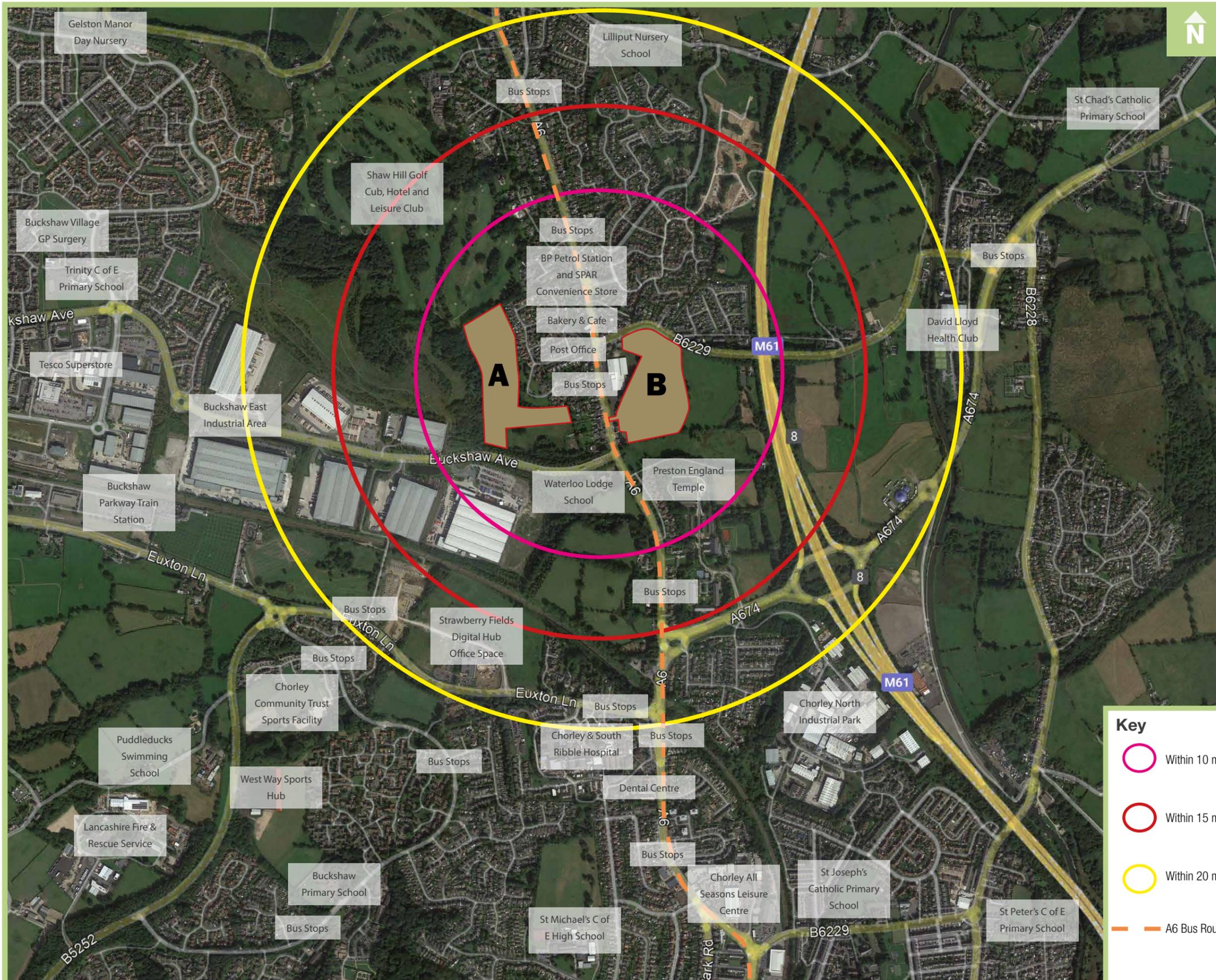
4 Bungalows set back behind generous green frontages. The existing retained tree belt will create a mature landscape setting as well as filter views into and out of the development.

5 Landscaped green amenity area will provide a soft edge to the development and it will help to highlight the new pedestrian link from Preston Road into the development.

6 Pedestrian and cycle link will connect the development with the amenities and bus services located on Preston Road (A6).

7 Yield is approximately 35 no. bungalows.

Diagram 21.1



Key

- Within 10 minutes walking distance
- Within 15 minutes walking distance
- Within 20 minutes walking distance
- A6 Bus Route

Diagram 22.1

5 Sustainability

This Development Statement demonstrates that land east and west of Whittle-le-Woods is a highly sustainable opportunity to assist Chorley Council in meeting the need for specialist housing for retired and older people across Central Lancashire and fulfilling the economic, social and environmental objectives of sustainable development required by the NPPF 2021.

Accessibility

Site A and Site B are accessible locations in close proximity to a range of local services and community facilities, the primary and strategic highway network and bus and rail public transport services. Both sites adjoin the urban area of Whittle-le-Woods which provides a range of services and facilities including health services, shops, convenience store, cafes, public houses, post office, petrol filling station, community centres, sport facilities, recreation areas and places of worship. A wider range of facilities is located within 2 km including Buckshaw Village and Chorley which provide main town centre uses.

Both sites are accessed, via Foxglove Drive and Moss Lane, from Preston Road (A6) which is the main road corridor running north to south through Whittle-le-Woods and which connects to the motorway network at M61 Junction 8 1.3 km to the south and M6 Junction 29 / M65 Junction 2 7.5 km to the north. Preston Road is also a high-frequency bus route with up to five services per hour to Chorley, Leyland, Preston and other town and city centres, and both sites have convenient walking access to bus stops 220 metres from Site A and 130 metres from Site B. Both sites are also 2 km from Buckshaw Parkway railway station.

As required by the NPPF 2021, the development opportunity at land east and west of Whittle-le-Woods offers retired and older people the ability to form a strong, vibrant and healthy community which is integrated with the adjacent urban area and

has convenient and safe access by walking, cycling and public transport, as well as private modes of travel, to a range of services, community facilities and outdoor spaces in the local area.

Local services

Both Site A and Site B are located in proximity to a range of local services and facilities used by retired and older people which can be accessed by walking, cycling and public transport via the bus services operating on Preston Road (A6).

Both sites are located within walking distance of the convenience store, post office, shops, hairdresser, café and public house on Preston Road (A6), and further shops, supermarkets and food and drink outlets are available in the north part of Whittle-le-Woods, Buckshaw Village and Chorley. There are health, GP and dental services available at Whittle NHS Surgery and pharmacy, and the Chorley and South Ribble NHS Hospital is 1.2 km south of both sites. There are

community centres and sport and leisure facilities at Whittle-le-Woods village hall, several places of worship, Shaw Hill golf club, David Lloyd and Whittle-le-Woods Cricket Ground, and there is outdoor recreation at Mossfield Nature and Cuerden Valley Park



Convenience Store on Preston Road (A6)



Shops on Preston Road (A6)



Sea View Public House on Preston Road (A6)

Sustainability

Building for a Healthy Life

The proposed development is compliant with local and national planning policies on specific design related issues. The proposals meet a high standard of design and accessibility.

The application proposals have also been considered against the twelve principles set out in 'Building for a Healthy Life'. These considerations state that designers and developers should:

Integrated Neighbourhoods

Create places that are well integrated into the site and their wider natural and built surroundings. Avoid creating isolated and disconnected places that are not easy places to move through and around.

The sites have been designed to ensure pedestrian and cyclist safety at all times, curved street geometry, where possible, calming vehicle speeds. The proposals include the provision of a range of green spaces which would help to encourage those living on the development to choose walking or cycling above using their cars.



Short trips of up to three miles can be easily made on foot or bicycle if the right infrastructure is in place, helping to improve public health and air quality whilst also reducing local congestion and carbon emissions.

The sites are within easy walking and cycling distance of a range of local services and facilities. These include Buckshaw Village Community Centre and Doctors Surgery, bars and restaurants, supermarkets and shops. There are numerous facilities to the south in Chorley town centre which include a hospital, medical centres, supermarkets, restaurants, shops, various leisure facilities and business/employment parks.

Places that offer social, leisure and recreational opportunities a short walk or cycle from their homes.

The nearest bus stop are located on Preston Road (4 minute walking time/1 minute by bicycle) with regular services running to and from Bolton, Preston, Brindle and Chorley town centre. Near by there are a vast array of leisure and recreation opportunities, these include Shaw Hill Golf and Leisure, David Lloyd Leisure Club, The Leeds, Liverpool Canal, Healey Nab, White Coppice, Rivington Pike and Winter Hill, The Anderton Outdoor centre and Cuerden Valley Park. The furthest of these being 15 minutes by bicycle.

A range of homes that meet local community needs.

The sites would look to deliver a range of detached bungalows with a mix of 2 and 3 bedrooms and a range of detached two storey 2, 3, 4 and 5 bed roomed homes; which is in line with the local area. All properties will have access to private outdoor space.

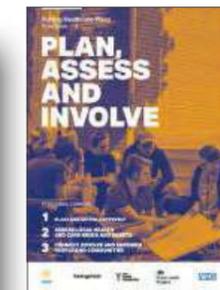
Distinctive Places

Understand and respond.

The sites are currently fields with one housing chicken farming sheds. The proposals have incorporated the need for soft, green, landscaped edges. It is proposed that attractive bungalows would flank the entrance into the development. Public and private realm will be defined by attractive landscaping with the provision of a range of green spaces respecting the semi-rural feel of the area.

Create places that are memorable.

The internal roads will be enclosed by buildings that front onto them creating active frontages throughout the development. A number of key nodal areas are proposed providing easily identifiable spaces within the development.



Create a network of streets and spaces that are well enclosed by buildings and/or structural landscaping, taking care to ensure that front doors and the principal facades of buildings face streets and public spaces.

The designs have ensured that all blocks face onto the newly created streets, the existing building lines and urban grain have been respected. Careful consideration has been given to the vistas that are revealed along the newly created streets ensuring that street vista terminations are attractive and not onto rears of properties or blank elevations, where possible.

Use legible features to help people find their way around a place.

Where possible vistas into or onto the local area will be framed, for example the vista into the developments will be that of attractive arrival greens overlooked by header/focal buildings, helping to provide a unique sense of place and a memorable way marker. The simple street form mixed with the creation of key nodal areas will ensure residents and visitors navigate the site with ease.

Streets for All

Streets are different to roads. Streets are places where the need to accommodate the movement of motor vehicles is balanced alongside the need for people to move along and cross streets with ease. Activity in the street is an essential part of a successful public realm.

The design of the streets allows for both pedestrian and vehicular movement in unity. It is proposed that the main streets are lined with trees, there will be ornamental shrub and tree planting in key locations providing attractive places to chat or sit within the streetscape along with the potential for community areas/orchards within the green spaces. Streets will be as direct as possible responding to pedestrian and cycle desire lines.



Well-designed developments will make it more attractive for people to choose to walk or cycle for short trips helping to improve levels of physical activity, air quality, local congestion and the quality of the street scene. Well-designed streets will also provide sufficient and well-integrated car parking.

It is hoped that the strategies mentioned in the previous point and the provision of attractive green spaces will encourage residents and visitors to walk or cycle within the development. All gardens have adequate and secure space for the provision of cycle storage. The site has been designed so that there is enough parking provision so that the streets and roads are not overly dominated by vehicles ensuring cyclists can travel with ease.

Creative surface water management such as rills, brooks and ponds enrich the public realm and help improve a sense of wellbeing and offer an interaction with nature. As the richest habitat for a range of flora and fauna, they are also a key play in achieving the net gain in biodiversity sought by the 2020 Environment Bill.

There are three ponds proposed which will also form part of the SuDS, there is also the retention of the existing watercourse along with the provision of plants that are native and wildlife friendly. Wildflower seed will be used to plant verges to enhance ecological value of the site, where possible.

Garden cities, towns and suburbs used hedges to define public and private spaces, helping to create characterful and biodiverse places. The space between the back of the pavement and the face of buildings has a significant impact on the quality of a place. Clear demarcations between public and private spaces can encourage people to personalise the front of their homes whilst also offering opportunities to integrate level changes, utility boxes and waste storage.

To the fronts of the bungalows there will be a balance of parking provision and green space. Formal hedges will act as boundary treatments between the private and public realm. Evergreen hedges provide year round shelter, nesting and foraging opportunities for birds and mammals. This will also provide an attractive space for social interaction. Access to the rear gardens and storage solutions will be via paths to the sides of properties.

Technical Assessment

Introduction

The proposed land allocations and concept designs put forward in this Development Statement have been informed, and are supported, by a range of evidence-base survey and assessment reports commissioned by Applethwaite. These are summarised below and demonstrate that both Site A and Site B are not constrained by any of the following technical considerations:

- Access and transport
- Flood risk and drainage
- Ecology and biodiversity net gain
- Trees and hedgerows
- Landscape and visual effects
- Heritage assets
- Land contamination & mineral safeguarding
- Utilities

Access and Transport

Vehicular and emergency access can be provided to Site A via a standard priority-controlled junction from a single point on Foxglove Drive in the same location as the existing field gate. Foxglove Drive is subject to a 20 mph speed limit and 25 metre visibility splays can be provided in each direction. Likewise, vehicular and emergency access can be provided to Site B from Moss Lane (B6229) via a standard priority-controlled junction slightly west from the existing field gate. Moss Lane is subject to a 30 mph speed limit at this point and 43 metre visibility splays can be provided in each direction. Foxglove Drive and Moss Lane join and give direct access to Preston Road (A6) which runs centrally through Whittle le Woods and connects to Preston and the M6 and M65 to the north, and Chorley and the M61 to the south.

Traffic generation from the proposed development can be safely accommodated on the local network and it is unlikely that junction improvements or other off-site mitigation will be necessary.



Lea Road, pedestrian Link to site A

As Site A and Site B are not served (or constrained) by any public rights of way (PRoW) several new pedestrian and cycle access points can also be provided onto Foxglove Drive, Moss Lane (B6229) and Preston Road (A6) to connect the proposed development to surrounding residential areas and the range of local services and community facilities in Whittle le Woods which are within acceptable walking and cycling distances. These pedestrian links also provide access to several close-by bus stops on Preston Road (A6) which is a high-frequency bus route with up to five services per hour to Chorley, Leyland, Preston and other town and city centres. The bus stops are 220 metres from Site A and 130 metres from Site B. These pedestrian routes will also provide new access to the land within Site A and Site B which is to be enhanced as public open space for the use and wellbeing of the local community.

Overall, housing development with appropriate mitigation can be achieved as proposed at Site A and Site B with no adverse landscape and visual harm.

Flood Risk and Drainage

Site A and Site B are both in Flood Zone 1 and suitable for residential development. They are not at risk of flooding from fluvial or man-made sources but there is localised surface water flood risk within Site A at the lowest points on the west boundary along Euxton Brook and a central area of marshy ground around a connecting ditch. This crosses the proposed public open space however and poses no risk to the proposed housing development. There is also a risk of localised surface water flooding in the lowest part of Site B along the boundary drainage ditch and through marshy ground. This is also proposed public open space and much lower than the proposed housing development. There are no flood risk constraints which prevent development of Site A and Site B.



Access onto Preston Road (A6) From Site B

Both Site A and Site B have downward sloping natural topography draining to watercourses. This terrain can be fully utilised to create sustainable drainage systems (SuDS) for each proposed development using surface attenuation features such as swales and balancing ponds with outfalls to Euxton Brook flowing west through Buckshaw Village (Site A) and the drainage ditch flowing east to Gale Moss and the River Chor (Site B), and which can also provide new ecological habitat and significant biodiversity net gain.

Technical Assessment

Flood Risk and Drainage continued

The locations of these are shown on the proposed masterplan. Foul drainage will be pumped for both Site A and Site B and sewer connections are available.



Mossfield Nature Reserve Adjacent to Site A

Ecology and Biodiversity net gain

There are no statutory and non-statutory nature conservation designations within or adjacent to Site A and Site B. The West Pennine Moors and Charnock Richard Pasture Sites of Special Scientific Interest (SSSIs) are located 3.7 kilometres east and 4.7 kilometres south respectively however new housing development within the associated Risk Impact Zones does not meet the criteria to consult Natural England and the proposed development will have no adverse affect on these areas.

Both Site A and Site B consist of semi-improved grassland intersected and enclosed by watercourses / drainage ditches, hedgerows and broad-leaved trees. The main ecological constraints and opportunities confirmed by a site walkover are:

- central and eastern hedgerows at Site A and the northern hedgerow at Site B are Priority Habitats
- habitat connectivity along Euxton Brook and adjacent woodland on the boundary of Site A

- areas of marshy grassland at Site A and Site B
- stands on invasive Indian Balsam at Site A and Site B
- hedgerows and tree habitat suitable for foraging bats and nesting birds at Site A and Site B
- watercourse and drainage ditch habitat suitable for water vole at Site A and Site B
- detection of great crested newt (based on Environmental DNA analysis) at a pond west of Site A
- presence of ponds suitable for amphibian species including common toad around Site A

These constraints together with appropriate mitigation measures and opportunities to enhance the ecological value of Site A and Site B are incorporated into the proposed development masterplan.

Overall, proportionate housing development, with appropriate mitigation and management, can be achieved as proposed at Site A and Site B with no adverse ecological impacts on designated areas, habitats and protected species. Retention and enhancement of existing habitat is incorporated into the proposed masterplan and new habitat creation is proposed, and it is expected that meaningful long-term biodiversity net gains can be achieved at Site A and Site B.

Trees and hedgerows

There are no tree and hedgerow constraints within and adjacent to Site A and Site B which would prevent the proposed bungalow development. The distribution within Site A follows the agricultural field pattern and comprises a linear framework of perimeter and remnant dividing hedgerows interspersed with larger trees enclosing unconstrained fields. The trees and hedgerows within Site B have a different form and character, comprising a belt of sycamore, oak and birch trees encircling the upper part of the site and mixed hedgerows and smaller tree groups around the perimeter. The areas in between are unconstrained and free of isolated trees

The proposed masterplan is informed by tree and hedgerow surveys and shows that housing development, with appropriate mitigation and construction management, can be accommodated within and around the trees and hedgerows at Site A and Site B with no adverse impacts. All category A, B and C trees and hedgerows are retained, other than limited removal needed to form roads and access, and there is extensive scope for new tree and hedgerow planting within the large areas of public open space at Site A and Site B. New planting can include native species of most benefit to wildlife and providing biodiversity net gain, and species designed for the community and wellbeing including fruit trees and planted orchards.



Area for Biodiversity Net Gain at Site A

Technical Assessment

Trees and hedgerows continued

Individual trees within the southern part of Site A are subject to Chorley Borough Council Tree Preservation Order No.7 (Whittle-le-Woods) 1993 and unaffected by the proposed development being within the proposed public open space. At Site B, the main tree belt is subject to Chorley Borough Council Tree Preservation Order No.3 (Whittle-le-Woods) 1977. Selective removal is limited to form an access and the poor quality Ash trees between the poultry hatcheries which are unfit for retention.



Housing on Foxglove Drive adjacent to site A

Landscape and Visual effects

There are no national or local landscape designations within or adjacent to Site A and Site B and neither are 'valued landscapes' as defined by the NPPF. Both sites are within the Lancashire Valleys national landscape character area (LCA) as 'pastoral land strongly influenced by urban development' albeit they represent a very small proportion of this common feature in a broad area.

At local level, Site A is in the Cuerden/Euxton LCA and Site B is in the Samlesbury/Withnell Fold LCA. The relevant key characteristics of both LCAs are:

- gently undulating landscape of large lush green pastures divided by low cut hedgerows and trees
- influence of infrastructure (motorways, roads, junctions and rail), industry and built development
- rural character of the landscape is largely obscured by built development
- pockets of farmland and vernacular buildings survive as reminders of historic land use



Play area and public open space adjoining site A

Site A and Site B share some of these characteristics as 'pastoral land including trees and hedgerows influenced by surrounding housing and urban development' on Preston Road (A6), Moss Lane (B6229) and Buckshaw Avenue. They register as remnant areas of, not uncommon, farmland on the developed edge of Whittle le Woods and consequently have an established urban character and context.

Proposed development of Site A can be accommodated in the Cuerden/Euxton LCA without compromising its character because of the degree of permanent enclosure provided by adjacent housing, woodland and tree belts. Proposed

development of Site B is more sensitive as it lies on the elevated settlement edge but carefully designed low height bungalow development contained by the tree belt, can be accommodated in the Samlesbury/Withnell Fold LCA and will round off the urban area. Both Site A and Site B will also provide retained and enhanced areas of open land and landscape mitigation, including:

- hedgerow, tree and woodland planting and management
- species-rich unimproved grassland creation, management and conservation
- clustered forms and pockets of development
- locating development to maintain key views to landscape features and landmarks

Site A is only visible from a very limited geographical area. The woodland and tree belts to the north, west and south prevent close range and distant views from public roads, vantage points and Buckshaw Village to the west and there are no public footpaths in this area. Proposed development will only be viewed from the adjacent housing development on Foxglove Drive and Shaw Hill golf course, and screened by trees and hedgerows.



Housing on Moss Lane adjacent to site

Technical Assessment

Site B is visible from a wider area, albeit still limited, with primary views from the adjacent housing to the north. Views from Preston Road (A6) to the south will be largely unchanged and views from higher and distant vantage points to the east will be of a slightly greater developed edge to Whittle le Woods beyond the M61 motorway which will not be out of keeping with the composition of present views.

Overall, housing development with appropriate mitigation can be achieved as proposed at Site A and Site B with no adverse landscape and visual harm.

Heritage assets

There are only two designated heritage assets within the vicinity of both Site A and Site B and no other conservation areas, listed buildings, scheduled monuments, registered parks and gardens or battlefields, and no non-designated assets.



Rotherham Top Farmhouse

Site A and Site B are also not located within areas of archaeological importance or potential significance. The two designated assets are listed buildings:

- Rotherham Top Farmhouse (Grade II) - located 200 metres east of Site A and 150 metres west of Site B

- Waterloo Lodge (Grade II) - located 370 metres south of Site A and 230 metres west of Site B

The setting of Rotherham Top Farmhouse is already significantly altered and harmed by surrounding modern housing and commercial development, and there is no physical relationship and/or visual connection between it and Site A and Site B.



View of Site B from Waterloo Lodge

Waterloo Lodge (private school) retains its more open setting but is altered and harmed by the adjacent Buckshaw Avenue road embankment which forms a hard physical and visual barrier between the heritage asset and proposed development at Site A. The setting northwest of Waterloo Lodge is more open and a distant view of the southern edge of the proposed development at Site B is possible, albeit filtered by trees and partially obscured by development on Preston Road (A6). The view of the proposed bungalows would replace the view of the present poultry hatcheries however so there is no change in terms of net additional development and no shortening of the intervening distance, and so overall there is no harm to the setting and significance of Waterloo Lodge.

Land Contamination and Mineral Safeguarding

There are no known sources of active or historic land contamination within and adjacent to Site A and Site B and no known records of mine workings which would adversely affect the proposed bungalow development. Narrow parts of Site A and a small part of Site B are within a sand and gravel Mineral Safeguarding Zone however commercially viable and acceptable extraction is not feasible and unlikely to constrain development.

Utilities

There are no utilities constraints preventing the development of Site A and Site B. Being adjacent to the urban area of Whittle-le-Woods, all services (water, gas, electricity, foul drainage and telecoms / broadband) are available in the highways surrounding both sites and suitable connection points are available. There are no utilities (overhead or below ground) within Site B but two parallel 450 mm and 250 mm United Utilities water mains pass through the southern part of Site A. This easement is outside the proposed development area and crosses the proposed public open space.



Housing on Moss Lane opposite Site B

6 Deliverable Allocations

The land east and west of Whittle-le-Woods is being promoted by Applethwaite for allocation in the emerging Central Lancashire Local Plan 2023 to 2038 for age-restricted specialist bungalow development.

To maintain a deliverable supply of land providing a sufficient choice and a mix of opportunities for all types of housing development in appropriate and sustainable locations to meet housing needs, the NPPF 2021 requires that land identified for allocation in a development plan must be available, suitable and achievable (a realistic prospect of being economically viable).

Site A and Site B, comprising the land east and west of Whittle-le-Woods, are available, suitable and achievable land allocations. They offer sustainable development opportunities and are ideally placed to meet older peoples' specialist housing needs in Chorley and Central Lancashire in accordance with the NPPF and PPG, sector best practice and the emerging Local Plan evidence base demonstrating the need for, and desirability and benefits of, age-restricted bungalows.

Availability

Applethwaite owns the controlling interest in both Site A and Site B and there are no known legal and/or ownership constraints. Both areas are available for development and Applethwaite is working with the landowners so that the land can be developed in the early part of the emerging Central Lancashire Local Plan 2023 to 2038 period and as soon as possible following adoption. Applethwaite is an experienced and practised developer, adept and with a long track record as one of the first house builders to specialise in the development of exclusive age-restricted Part M4(2) bungalows for retired and older people across Central Lancashire and the wider north west region.

Developing the land east and west of Whittle-le-Woods as a sustainable opportunity for medium-scale development of high-quality age-restricted specialist bungalows for retired and older people will make a much-needed important and distinct contribution to meeting older peoples' housing needs in Chorley and Central Lancashire, with the potential to deliver approximately 55 no. (Site A) and 35 no. (Site B) high quality bungalows.

Suitability

Notwithstanding that the land east and west of Whittle-le-Woods is currently within Green Belt adjoining the urban area settlement boundary, the proposed net development areas of Site A and Site B are both eminently suitable and sustainable opportunities for the provision of specialist bungalows for older people. It is demonstrated that the proposed allocations:

- are moderate, contained and logical additions to Whittle-le-Woods
- can be safely accessed and connected to the local highway network
- can be provided with all available utility services and infrastructure connections
- have no insurmountable technical and environmental constraints in terms of topography, ground conditions, flood risk, landscape, heritage and biodiversity and will incorporate appropriate mitigation measures
- have good pedestrian and cycle access to the range of local services and community facilities in Whittle-le-Woods and bus and rail public transport services
- will provide environmental and social enhancement of the land retained in Green Belt for the benefit of the local community including areas of public open space; opportunities for community health and outdoor well-being; footpath links; tree and hedge planting and biodiversity and habitat creation.

Achievability

Applethwaite is an experienced house builder specialised in the identification of land and the construction and sale of medium-scale developments of exclusively age-restricted Part M4(2) bungalows for retired and older people.

It has identified the land east and west of Whittle-le-Woods as a suitable opportunity for bungalow development in terms of the physical attributes of Site A and Site B and, equally importantly, their geographical location, aspect and setting in terms of market attractiveness to the customer demographic, household circumstances and lifestyles of retired and older people aged 55 and over.

Applethwaite has tested the economic feasibility of the proposed allocation for bungalow development in terms of benchmark land value, abnormal costs and construction costs set against expected market demand and sales values in the local Whittle-le-Woods area. It is satisfied that the proposed allocation of Site A and Site B will enable development to be delivered which is sufficiently financially viable and therefore achievable.

7 Conclusion

Land East and West of Whittle-le-Woods, comprising Site A and Site B, is a distinct and highly sustainable opportunity to meet the housing needs of retired and older people in Chorley and Central Lancashire by providing high-quality age-restricted specialist bungalows which meet Part M4(2) Accessible and Adaptable Dwellings building regulation standards.

This Development Statement has been prepared to demonstrate the merits, suitability and deliverability of the land to the east and west of Whittle-le-Woods for age-restricted specialist bungalow development, and sets out the compelling case to include Site A and Site B as available, suitable and achievable land allocations in the emerging Central Lancashire Local Plan 2023 to 2038, and which meet the social, environmental and economic objectives of sustainable development.

In summary, it is demonstrated that Site A and Site B:

- Adjoin the urban area of Whittle-le-Woods which is an Urban Local Service Centre in the Chorley Local Plan 2015 and a District Centre in the emerging Central Lancashire Local Plan 2023 to 2038 where 'moderate growth and investment' will take place
- Perform limited Green Belt roles and can be removed by alteration of the boundary without compromising the strategic functions of Green Belt around Whittle-le-Woods, and the southern parts of both sites will remain in Green Belt and provide environmental and social enhancement
- Can deliver well-planned, high-quality bungalow communities for retired and older people that are sensitively designed to retain and protect landscape features, provide extensive open space, and integrate and connect with adjacent areas and public transport

- Have no insurmountable technical and environmental constraints in terms of topography, ground conditions, flood risk, landscape, heritage and biodiversity and will incorporate appropriate mitigation measures and achieve meaningful, long-term biodiversity net gain
- Have good pedestrian and cycle access to the range of local services and community facilities in Whittle-le-Woods and bus and rail public transport services, and can be safely accessed and connected to the local highway network, and provided with utilities and infrastructure connections
- Are available for development and will be delivered in the short term by Applethwaite which is one of the first and most experienced companies specialising in the development of exclusive age-restricted Part M4(2) bungalows for retired and older people across Central Lancashire
- Will generate significant social, economic and environmental benefits by giving retired and older people opportunity and choice to satisfy their housing needs; creating local investment and construction; and, providing a range of Green Belt, landscape, climate and biodiversity gains.

Applethwaite wishes work collaboratively with Chorley Council to develop its proposals for east and west of Whittle-le-Woods and help meet the critical and growing, specialist housing needs of retired and older people in the Borough.



Recent Applethwaite development



Recent Applethwaite development



Recent Applethwaite development

LAND EAST AND WEST OF WHITTLE-LE-WOODS

DEVELOPMENT STATEMENT

FEBRUARY 2023

