

Land at Babylon Lane, Adlington

Proposed housing allocation

**REPRESENTATIONS ON CENTRAL LANCASHIRE LOCAL PLAN
REGULATION 19 CONSULTATION**

APRIL 2025

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/1 INTRODUCTION

- 1.1. PWA Planning has been instructed to make representations on the Regulation 19 Consultation on the Central Lancashire Local Plan 2023-2041 Publication Version in relation to a parcel of land located to the east of Babylon Lane, Adlington, Chorley (the Site). The Site is a draft housing allocation in the Publication Version documents, site ref. HS2.5.

- 1.2. It is our view that the Site should be allocated for housing in the forthcoming Central Lancashire Local Plan (CLLP). The details contained within these representations and the supporting materials demonstrate that the Site is suitable for this use. These representations also address some of the specific technical points raised in the assessment of the Site in the Regulation 19 documentation.

/2 SITE OVERVIEW AND BACKGROUND

- 2.1. The Site is currently allocated as safeguarded land in the Chorley Local Plan 2012 - 2026.
- 2.2. The Site is roughly triangular in shape and extends to approximately 2.5ha. It is bound to the west by Babylon Lane and to the east by Greenhalgh Lane. A private road serving the properties to the northeast crosses the Site towards its northern part. A further road, Whitebeam Close, cuts through the northwest corner of the Site.
- 2.3. The Site currently comprises private grazing land. There is a building towards the southern end of the Site which is used by the Rivington and Adlington Brass Band. The building comprises a single-storey stone structure with a slate pitched roof. Stone walls surround the majority of the Site. There are several trees within the boundary, most notably in the southern most portion of the Site.
- 2.4. The Site is surrounded by residential development. This includes houses along Babylon Lane itself, those on Greenhalgh Lane to the southwest and those off Beech Avenue which back onto the Site along its south-eastern edge. Further properties are located to the north of the Site accessed off Whitebeam Close and a private road. To the east of the central portion of the Site are open fields between the site and the M61.
- 2.5. The Site is located in a highly sustainable location, with numerous services, facilities and sustainable transport options located within walking distance. Amenities and services in Adlington include four primary schools, children's nurseries, two doctor surgeries, dentists, optician, post office, community centre, places of worship, library and several public houses/restaurants. The town is served by a railway station on the Manchester to Blackpool line and regular bus services which run between Bolton and Preston and the surrounding area. Adlington includes two main shopping areas, across which are located several small supermarkets/grocery stores, bakery, two pharmacies and several cafes/takeaways.
- 2.6. The Site is not subject to any ecological or landscape designations. It is within Flood Zone 1 where the risk of flooding is at its lowest, although some of the allocation area is subject to surface water flood risk. The Site is not subject to any historical designations. The closest listed building is Greenhalgh Farmhouse to the east of the Site on Greenhalgh Lane. Some of the trees within the site are subject to Tree Preservation Orders (TPOs). There are no

Public Rights of Way (PROW) crossing the site, however, Greenhalgh Lane, which bounds the southeast of the Site is a PROW.

2.7. The Site has been subject to two planning applications in recent years for broadly similar development:

- 21/00270/FULMAJ - full application for 40no. dwellings, submitted March 2021. An appeal against the non-determination of this application by Chorley Council was made on 12th March 2025 (ref. APP/D2320/W/25/3362219). This appeal is currently awaiting determination.
- 23/00510/OUT - outline application for 40 dwellings, submitted June 2023. An appeal against the non-determination of this application by Chorley Council was made in September 2023. The appeal (ref. APP/D2320/W/23/3329702) was dismissed in May 2024, for the sole reason that a Sequential Test had not been applied to the development site, which included areas at risk of surface water flooding.

2.8. The above applications and how the issues raised during these relate to the allocation of the Site for housing will be explored further in Section 4 of these representations.

/3 PREVIOUS REPRESENTATIONS

- 3.1. The Site has been subject to previous representations in relation to the CLLP, in response to the Call for Sites 1 process in November 2018 and Issues and Options paper, which was published in November 2019.
- 3.2. These representations sought to promote the Site for residential development. The Site was identified within Annex 1 (Site Suggestions Proposed by Chorley Council) and Annex 5 (All Site Submissions Received for Chorley) of the Issues and Options paper by reference 19C272x.
- 3.3. In the Regulation 18 consultation on the Preferred Options Part One (PO1) published December 2022, the Site was discounted for residential development. It was listed under Appendix 1 – Discounted Sites in the *Site Selection Process: Housing and Employment Land* which was a supporting document to the PO1. The site was listed twice in this appendix identified by its SHELAA references 19C103 and 19C272x.
- 3.4. Under the heading 'Reason Discounted' the following is stated about site ref. 19C272x:
"Flood risk - Level 1 SFRA Strategic Recommendation A which advises withdrawal of the site based on significant level of fluvial/tidal or surface water flood risk (if development cannot be directed away from areas at risk). Part of site within medium surface water risk zone. The Environment Agency advised avoiding development at this site and retaining the existing priority habitat which is providing flood storage and carbon benefits."

/4 PROPOSED SITE ALLOCATION

- 4.1. PWA Planning has made more general representations on the Regulation 19 Consultation on the Central Lancashire Local Plan 2023-2041 Publication Version. Whilst the purpose of this document is specific to site ref. HS2.5 at Babylon Lane, it is worth drawing out some of the key points of that more general response as they are relevant to the allocation of this Site:
- 4.2. PWA agrees with and broadly supports the vision for sustainable growth outlined in the Publication Version. However, the vision should explicitly reference the importance of significant housing growth to ensure economic sustainability and affordability. The plan must go further in addressing the region's housing shortfall, ensuring that policies actively promote housing delivery rather than restrict it.
- 4.3. Whilst the Publication Version acknowledges the need for housing, it does not go far enough in ensuring that housing supply meets demand. The proposed allocations cover only 80% of the identified housing requirement, which contradicts the Publication Version's overall ambition for sustainable growth. There is a reluctance to release Green Belt land or allocate additional sites beyond those already identified, limiting the scale of housing development.
- 4.4. The Publication Version promotes 'balanced growth' but this concept appears to be used in a way that constrains housing delivery rather than fully addressing demand. It prioritises development in existing urban areas but does not propose significant new allocations outside these locations.
- 4.5. The lack of a full Green Belt review and the failure to allocate enough new housing sites suggest that growth is being controlled rather than maximised. The NPPF 2024 clarifies that Green Belt boundaries can be reviewed where housing needs cannot otherwise be met. The draft plan does not undertake a proper Green Belt review, which limits opportunities for sustainable development and fails to explore all reasonable options for meeting housing needs. A true growth strategy would include a comprehensive Green Belt review. The failure to consider Green Belt release is a major flaw in the Publication Version, as it prevents sustainable development from taking place in locations where demand is highest, which is particularly pertinent to Chorley given the amount of Green Belt across the borough.

HS2.5 - Babylon Lane, Adlington

- 4.6. The Site, ref. HS2.5 in the Publication Version, is allocated for housing and said to be able to accommodate 40 dwellings. We agree that this is the case.
- 4.7. Document 11 of the Regulation 19 documents provides the site profiles for allocations, with the Site details provided as Site Profile 33. The site is said to be *"Suitable, available and achievable. All identified constraints are likely to be able to be mitigated. Located in the Urban Local Service Centre of Adlington (Tier 3 of the settlement hierarchy) where there is a reasonable range of services and facilities,"* with an anticipated delivery date of 2027-2029 is provided. Again, we agree with these statements.
- 4.8. A summary of constraints is provided in the site profile in which two topics are raised: flood risk and heritage/archaeology.
- 4.9. With regards to heritage, it is stated that the Site is: *"located close to a heritage asset but the site provides little or no contribution to the significance of the heritage asset and its setting. The site requires no archaeological investigation"*. We agree this is the case. It is noted that in the recent appeal on the Site, ref. APP/D2320/W/23/3329702, the Inspector found that heritage impacts were low and were outweighed by the public benefits of delivering housing on this Site.
- 4.10. With regards to flood risk, the site profile states: *"there is a risk of surface water flooding. The planning application needs to address the issues raised in the flood risk assessment and needs to be supported by a sequential test and catchment wide drainage strategy."*
- 4.11. It goes onto state that:
"Level 1 SFRA Strategic Recommendation B – Level 2 SFRA required due to surface water.

Level 2 SFRA A flood risk assessment was prepared for a current planning application by the consultant preparing the SFRA for the Local Plan. As such they requested, we refer to the assessment for the planning application. This advises that the sequential test should still be performed at this site and should have been performed ahead of producing a planning application. The impacts of climate change on surface water have not been considered. This may impact the outcome of the sequential test and the proposed site layout and design. There appear to be several unknowns regarding the wider catchment i.e.: upstream flood risk and how that is factored into site and SuDS design, runoff from the

motorway and associated pollutants, downstream flood risk and how this can be reduced through site design, future maintenance details of culverts and SuDS features including maintenance procedures, ownership and responsibilities, funding and mitigation of surface water risk to Babylon Lane given this will be the primary access road to the site. There is a residual risk from culvert failure, blockage does not appear to have been considered or quantified. Full consultation with the LLFA must be carried out on a detailed, catchment-wide drainage strategy, accounting for upstream and downstream risks as well as onsite risks”.

- 4.12. It is also clarified that the LLFA’s comments on the Site are: *“there have been no flood reports on site or within 100m of the site, there are no ordinary watercourses on the site and 1.14% of the site is at high risk of surface water flooding.”*
- 4.13. Although the site profile refers to the need for a sequential test, this appears to be in relation to the planning application on the Site, as opposed to a suggestion that a sequential test should be carried out with regards to the Site allocation. That said, it must be assumed that in allocating the Site for housing in the Publication Version, the Council have themselves been through the process of establishing that there are no sites at lesser risk of flooding in the borough that can accommodate housing and which would be sequentially preferable to the Site.
- 4.14. Following the appeal dismissal, in February 2025 the applicants for application ref. 21/00270/FULMAJ made amendments to the full planning application which was still live, which involved ensuring that no built development was proposed on areas subject to current or future surface water flood risk. In fact, the changes ensured that there were no areas of current or future flood risk within the site boundary. In line with NPPF 2024 paragraph 175, a sequential test is therefore unnecessary. Following these changes, the Site is still able to accommodate 40 dwellings. A copy of the plan demonstrating this, ref. 1073-M-PL01 Rev U, is provided as Appendix A.
- 4.15. The supporting information submitted with the above planning application has demonstrated that the residual risk post-development from surface water flooding is very low, and that the scheme would reduce risks locally. Detailed drainage design would be undertaken following approval, with the appropriate information required by condition. It is noted that there are no objections from the Lead Local Flood Authority, United Utilities or

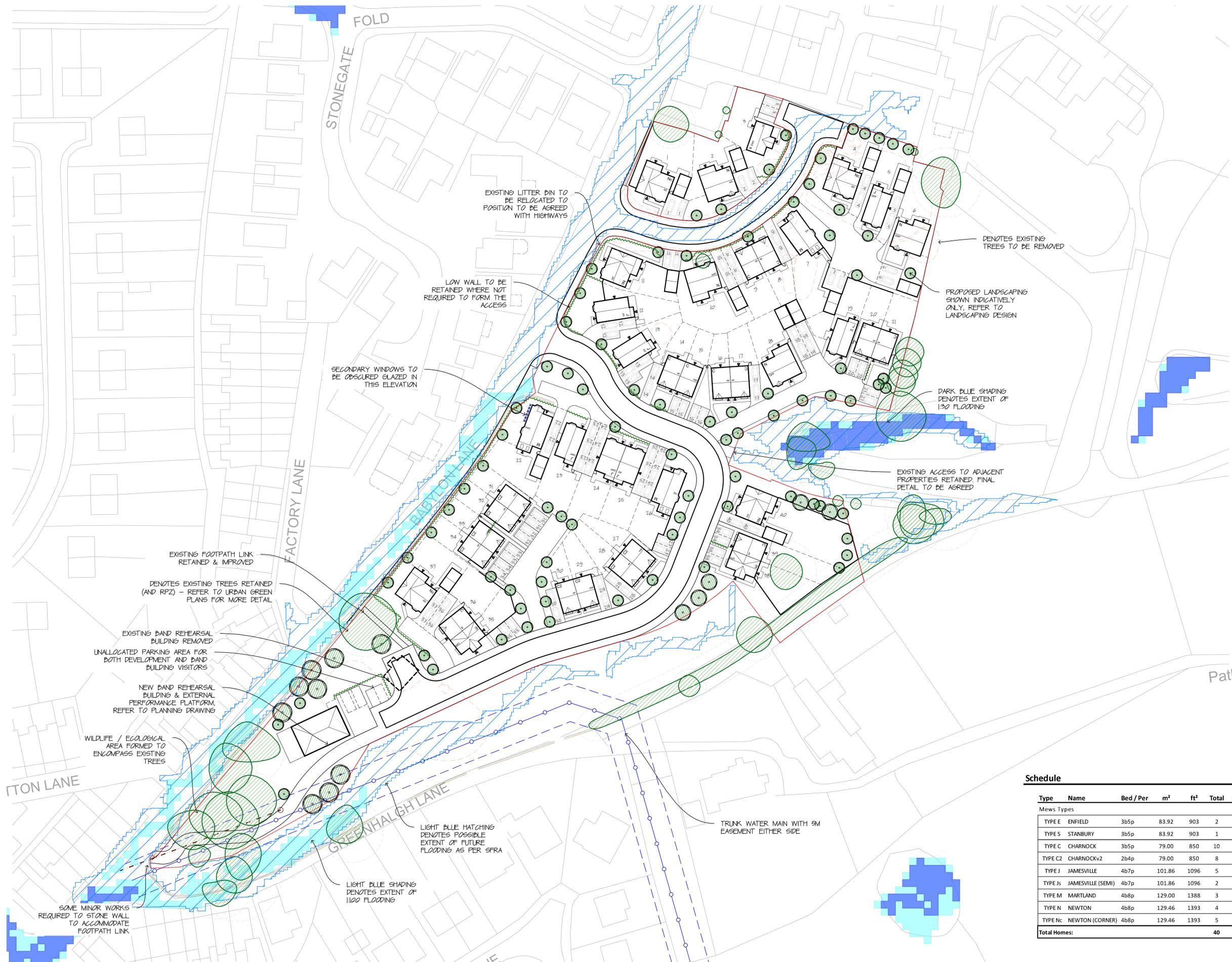
the Environment Agency with regards to the scheme which is subject of the current appeal, nor with the previous scheme that was dismissed on appeal.

- 4.16. Under the Level 2 SFRA heading in the site profile, the need for a sequential test has been removed, either by the fact that the Council have sought to allocate the Site as covered above or, with regards to the planning application, that a scheme can be delivered which does not include areas at risk of surface water flooding. The information under this heading states that there are several unknowns with regards to the wider catchment area and that full consultation with the LLFA must be carried out on a detailed, catchment-wide drainage strategy, accounting for upstream and downstream risks as well as onsite risks. This is not a barrier to development; as above, detailed drainage design would be undertaken as part of the development of the Site, to be required by condition. It is therefore our view that there are no genuine flooding or drainage risks associated with the Site. We assume the Council agree with this fact given they have sought to include it as a housing allocation.

Conclusions

- 4.17. The Site occupies a highly sustainable location with numerous services and facilities in walking distance and a range of sustainable transport options in close proximity.
- 4.18. The Site is available and deliverable as a housing allocation. Given its current designation as safeguarded land, there was an acceptance during the previous plan period that the Site and the wider safeguarded allocation should be protected for future development needs. It is now clear that Chorley needs to release this safeguarded land, together with other land, to meet future housing needs for the new plan period.
- 4.19. The Site has been subject to two live planning applications which have demonstrated there are no technical or environmental reasons which would preclude the Site coming forward for housing development. The Site would make a sensible housing allocation to meet future housing needs for Chorley and wider Central Lancashire area, in line with the suggestion in the Publication Version documents.

Appendix A - Proposed Site Layout ref. 1073-M-PL01 Rev U



EXISTING LITTER BIN TO BE RELOCATED TO POSITION TO BE AGREED WITH HIGHWAYS

LOW WALL TO BE RETAINED WHERE NOT REQUIRED TO FORM THE ACCESS

SECONDARY WINDOWS TO BE OBLISCURED GLAZED IN THIS ELEVATION

DENOTES EXISTING TREES TO BE REMOVED

PROPOSED LANDSCAPING SHOWN INDICATIVELY ONLY, REFER TO LANDSCAPING DESIGN

DARK BLUE SHADING DENOTES EXTENT OF 1:50 FLOODING

EXISTING ACCESS TO ADJACENT PROPERTIES RETAINED FINAL DETAIL TO BE AGREED

EXISTING FOOTPATH LINK RETAINED & IMPROVED

DENOTES EXISTING TREES RETAINED (AND RP2) - REFER TO URBAN GREEN PLANS FOR MORE DETAIL

EXISTING BAND REHEARSAL BUILDING REMOVED

UNALLOCATED PARKING AREA FOR BOTH DEVELOPMENT AND BAND BUILDING VISITORS

NEW BAND REHEARSAL BUILDING & EXTERNAL PERFORMANCE PLATFORM, REFER TO PLANNING DRAWING

WILDLIFE / ECOLOGICAL AREA FORMED TO ENCOMPASS EXISTING TREES

LIGHT BLUE HATCHING DENOTES POSSIBLE EXTENT OF FUTURE FLOODING AS PER SFRA

LIGHT BLUE SHADING DENOTES EXTENT OF 1:100 FLOODING

TRUNK WATER MAIN WITH 9M EASEMENT EITHER SIDE

SOME MINOR WORKS REQUIRED TO STONE WALL TO ACCOMMODATE FOOTPATH LINK

Schedule

Type	Name	Bed / Per	m ²	ft ²	Total	Total m ²	Total ft ²
Mews Types							
TYPE E	ENFIELD	3b5p	83.92	903	2	168	1806
TYPE S	STANBURY	3b5p	83.92	903	1	84	903
TYPE C	CHARNOCK	3b5p	79.00	850	10	790	8500
TYPE C2	CHARNOCKV2	2b4p	79.00	850	8	632	6800
TYPE J	JAMESVILLE	4b7p	101.86	1096	5	509	5480
TYPE Js	JAMESVILLE (SEMI)	4b7p	101.86	1096	2	204	2192
TYPE M	MARTLAND	4b8p	129.00	1388	3	387	4164
TYPE N	NEWTON	4b8p	129.46	1393	4	518	5572
TYPE Nc	NEWTON (CORNER)	4b8p	129.46	1393	5	647	6965
Total Homes:					40	3939	42382

U1	Redesign to suit revised red edge	01/20	2020-02-07
T	Amendments to improve appearance of external homes on Stonegate Fold	01/20	2020-01-07
S	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
R	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
P	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
N	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
M	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
L	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
K	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
J	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
I	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
H	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
G	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
F	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
E	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
D	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
C	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
B	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03
A	Redesign to improve appearance of external homes on Stonegate Fold	01/20	2020-01-03

Project Title: Babylon Lane Adlington
 Drawing Title: Planning Layout
 Drawing Number: 1073-M-PL01
 Drawing Status: PLANNING
 Sheet Size: A1
 Date: OCT 2020
 Revision: U
 Scale: 1:500



2 Lockside Office Park
Lockside Road
Preston
PR2 2YS

01772 369 669

www.pwaplanning.co.uk