



Response to the Central Lancashire Local Plan Regulation 19 Consultation

Submission in relation to:

[Land to the west of Blackburn Road, Chorley](#)

On behalf of Lee Bootle



March 2025

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Version Final

Date: 14th April 2025

1 INTRODUCTION

- 1.1 Thank you for providing an opportunity to comment on the Central Lancashire Local Plan (hereinafter referred to as “CLLP”) Regulation 19 Consultation Draft. Asteer Planning LLP (“Asteer”) act on behalf of Lee Bootle (“the Landowner”) in relation to the Land to the west of Blackburn Road (“the site”).
- 1.2 The emerging CLLP provides an opportunity for the three local planning authorities, Preston City Council, South Ribble Borough Council and Chorley Council, in partnership with Lancashire County Council, to set out a single strategy to enable sustainable growth in Central Lancashire for the next 20 years.
- 1.3 These representations seek to ensure that the Regulation 19 Plan fully considers the current and future housing needs of the Borough, in light of recent planning reforms and significant changes to the Central Lancashire authorities’ local housing requirements as a result of the Government’s steadfast commitment to easing the UK’s housing crisis by boosting housing land supply.
- 1.4 The land to the west of Blackburn Road presents a logical and strategically located site on the edge of Chorley, sandwiched between mixed-use allocations in the Regulation 19 Plan, and existing residential and commercial development. The site provides an opportunity to deliver between up to 122 dwellings to help to meet a range of housing needs across the borough.

Site Context

- 1.5 The site consists of approximately 8.7 acres (3.5 hectares) of gently sloping agricultural land situated to the north-east of Chorley, and within the Chorley (“the Council”) Authority Area. The site is bound by existing residential development to the north, the B6228 to the east, the A674 and built development to the west, and to the south by land which is currently proposed to be allocated for mixed-use residential and employment use, which would connect the site to the settlement of Great Knowley. The site is characterised by: agricultural farmland; a large residential dwelling with associated buildings and gardens; and, scattered trees. The approximate red line boundary is shown in Figure 1 below.

Figure 1: Site Boundary (used for illustrative purposes only)



- 1.6 The site to the west of Blackburn Road is logically positioned as an extension to the proposed mixed use allocation at the site immediately adjacent to the southern boundary (Ref EC5.5 Botany Bay/Great Knowley, Blackburn, Road, Chorley).
- 1.7 This document sets out the availability, suitability and deliverability of the site, which has the potential to provide the type and quality of homes to meet the acute housing needs of the Borough, either immediately or during the next Plan Period.
- 1.8 The remainder of this submission provides:
- A review of the planning policy context, including setting out why the Council should plan for a higher housing need, the changes to Green Belt policy and a review of and comments on the CLLP (and its proposed strategic policies);
 - The case for allocating the site to the west of Blackburn Road, including an assessment of why the site should be considered “grey belt” and why the site should be allocated for development;
 - Summary and conclusions.

- 1.9 The Landowner, via Asteer, would welcome ongoing engagement with the Council as the Regulation 19 Consultation responses are considered and the preparation of a new Local Plan is progressed. The Landowner and Asteer would be happy to discuss any feedback in relation to these representations, or in relation to the site.
- 1.10 The Landowner would also like to reserve the right to appear at the Local Plan Examination Hearing Sessions, should the Local Plan progress to that stage.

2 PLANNING POLICY CONTEXT

Revised National Planning Policy Framework

- 2.1 On 12th December 2024, a new National Planning Policy Framework (“NPPF” or “the Framework”) was published, with immediate effect. This builds on the Government’s housebuilding and delivery manifesto pledges, and seeks to support the delivery of land and sites across the country.
- 2.2 New mandatory housing targets have seen significant increases including in the North West. Whilst Central Lancashire has progressed its Local Plan to Regulation 19 stage, it should not simply ignore the fundamental shift in national planning policy direction and should proactively consider the ability of the Borough to meet its potential housing requirement throughout the entirety of the Plan Period – to 2041 – and beyond.
- 2.3 In relation to Central Lancashire, the key implications of the revised NPPF are as follows:

New Local Housing Requirements

- 2.4 Central Lancashire’s joint housing requirement has risen from 944 dwellings per annum (“dpa”) to 1,643 based on the new Standard Method for calculating Local Housing Need (“LHN”). This is a 74% increase in LHN. Across the three authorities, this consists of:
- Chorley’s local housing requirement has increased from 506 to 564 dpa;
 - South Ribble’s local housing requirement has increased from 169 to 489 dpa;
 - Preston’s local housing requirement has increased from 269 to 590 dpa.
- 2.5 The CLLP Regulation 19 Plan provides an annual housing requirement for Central Lancashire at 1,314 dpa, which has slightly increased from previous draft versions of the plan in order to achieve 80% of the LHN (1,643 dpa) in accordance with transitional arrangements in the NPPF. In the CLLP Regulation 19 Plan this consists of:
- An annual housing requirement of 334 for Chorley (compared to the Standard Method LHN of 564 dpa);
 - An annual housing requirement of 460 for South Ribble (compared to the Standard Method LHN of 489 dpa);
 - An annual housing requirement of 520 for Preston (compared to the Standard Method LHN of 590 dpa).

- 2.6 By any measure, the CLLP Regulation 19 Plan does not meet the significant increases in LHN, jointly or at a local authority level. As a minimum, the emerging Local Plan should be planning for the Standard Method LHN as set out in national policy to demonstrate that Central Lancashire are trying to meet their nationally identified housing and employment needs for the full plan period.

Transitional Arrangements

- 2.7 Transitional arrangements in the proposed NPPF are set out in its Annex 1. Paragraph 234a states that where a Local Plan has reached Regulation 19 on or before 12th March 2025 and it's draft housing requirement meets at least 80% of the new local housing need, then the plan can be assessed under the relevant previous version of the framework and should proceed to examination within a maximum of 18 months from 12th December 2024.
- 2.8 Whilst the CLLP accords with Paragraph 234a, this is by a very narrow margin as it meets exactly 80% of the local housing need, therefore Central Lancashire should consider adopting the new requirement in order to plan holistically for the entire Plan Period.
- 2.9 The plan particularly falls short in providing for Chorley's housing need, meeting only 59% of the new LHN. The CLLP should be pursuing a more balanced strategy for growth across the Central Lancashire authorities to properly plan for the current and future housing needs of Chorley.

Housing Land Supply

- 2.10 The requirement for Council's to demonstrate that they have a 5 Year Housing Land Supply ("5YHLS") has been strengthened in the new NPPF. The Central Lancashire authorities will (until a new Local Plan is adopted) need to robustly demonstrate that they have a 5YHLS each year, based on the new LHN.
- 2.11 Even if the Local Plan is progressed and adopted based on the Regulation 19 Plan joint requirement (1,314 dpa), this will become out of date five years after the adoption of the Local Plan and the 5YHLS would be calculated based on the individual Standard Method LHN for each authority.
- 2.12 For Chorley, this is significantly higher than the adopted requirement (Standard Method LHN of 564 compared to the proposed housing requirement in the CLLP Regulation 19 Draft of 334) – this could lead to a situation where Chorley will find it very difficult to

demonstrate a 5YHLS early into the Plan Period (and well before the end of the Plan Period in 2041).

2.13 With the Plan Period running to 2041, it is critical that the emerging Local Plan considers housing need throughout the entire Plan Period, and not just the first five years, to ensure sufficient sites are allocated (or safeguarded) later in the Plan Period to meet its potential future needs.

2.14 Furthermore, Paragraph 78c of the NPPF requires Local Planning Authorities to include a buffer on their 5YHLS where:

From 1 July 2026, for the purposes of decision-making only, 20% where a Local Planning Authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

2.15 Therefore, as the Regulation 19 Plan meets exactly 79% of the most up to date LHN figure (as updated on 25th March 2025), from 1st July 2026, the Central Lancashire Authorities may have to provide a 20% buffer in their 5YHLS across the joint plan area.

Green Belt / Grey Belt

2.16 The updated Framework has introduced circumstances where development in the Green Belt may not be regarded as 'inappropriate', where:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework; and
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.

2.17 In terms of criterion a), Grey Belt is defined as land comprising of previously developed land in the Green Belt and/or any other land that does not *strongly* contribute to any of the purposes: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent

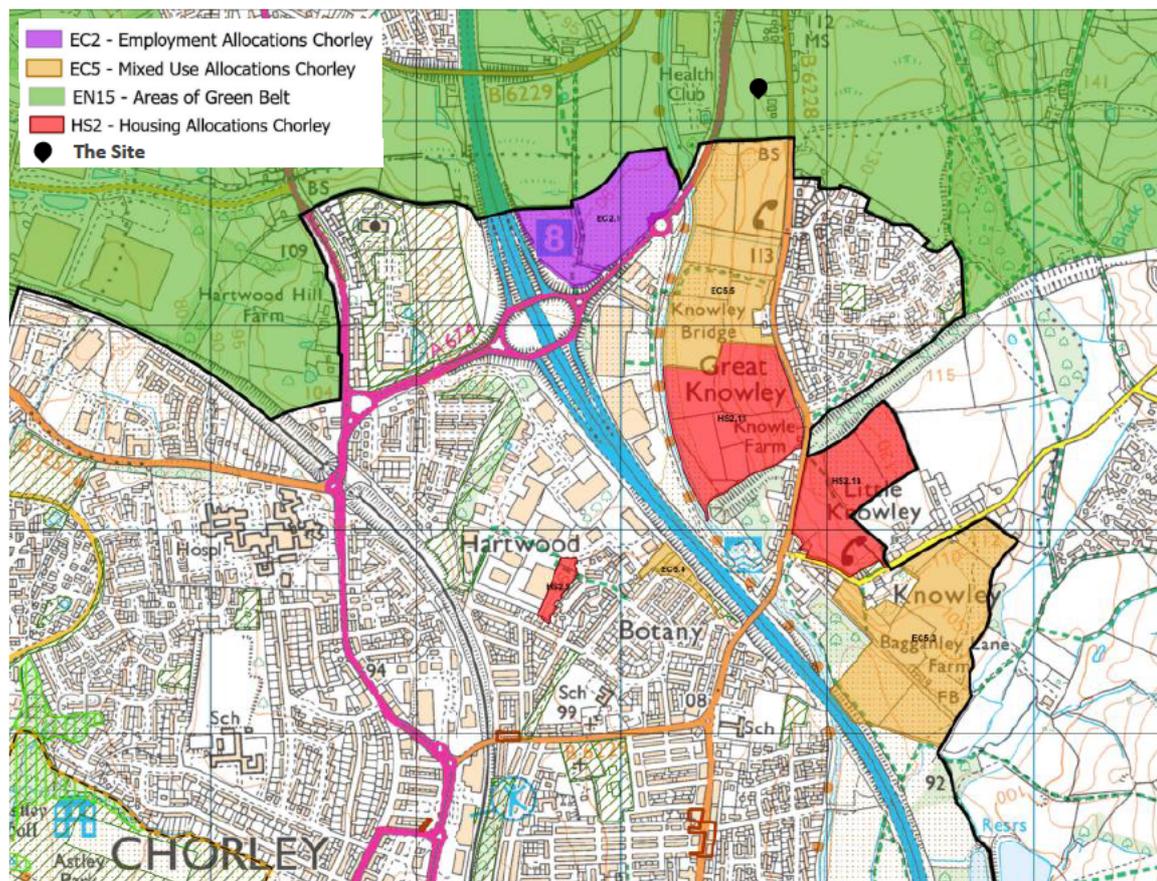
neighbouring towns merging into one another; (d) to preserve the setting and special character of historic towns. A review of the site in the context of the Grey Belt definition is provided in Section 4.

- 2.18 In the case of criterion b), for applications involving the provision of housing, this means the lack of a five year supply of deliverable housing sites or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years.
- 2.19 In terms of the Affordable Housing requirement on Green/Grey Belt sites, Paragraph 67 of the new NPPF states that as part of the 'Golden Rules' for Green Belt development, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should:
- a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and
 - b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).
- 2.20 Paragraphs 156-157 of the NPPF requires that where major housing development is proposed on Green Belt land, affordable housing should be provided in line with development plan policies that have been produced in accordance with Paragraphs 67-68 (outlined above); or, until such policies are in place, affordable housing contribution which is 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.
- 2.21 Central Lancashire should consider the introduction of 'Grey Belt' in the updated Framework in planning for their full housing needs as part of the plan making process. In the current CLLP strategy, Chorley is proposing that South Ribble and Preston meet a proportion of its unmet need and therefore no Green Belt release is proposed in Chorley. In line with the points above, Chorley should, as a minimum, plan for their Standard Method LHN and should consider the changes to the NPPF in relation to Grey Belt to meet their housing needs without considering inappropriate development in the Green Belt.

Emerging Local Plan

- 2.22 As touched on earlier, the CLLP Regulation 19 Plan has been prepared to meet exactly 80% of its new LHN (1,314 dpa versus the new LHN requirement of 1,643 dpa across the three authorities).
- 2.23 Chorley is proposing that South Ribble and Preston meet a proportion of its unmet need and as such Chorley have not released any Green Belt in the emerging Plan.
- 2.24 The CLLP Regulation 19 Plan allocates the site as within the Green Belt, covered by Policy EN15.
- 2.25 The site is on the edge of Chorley’s settlement boundary and there are two allocations immediately to the south of the site under EC5 ‘Mixed-Use’ and HS2 ‘Housing’. The Regulation 19 Policies Map is shown in Figure 2 below with a marker identifying the site.

Figure 2: Local Plan Regulation 19 Version Policies Map extract



- 2.26 In reviewing the evidence base, the following documents have been reviewed to critique the Council’s approach to site allocations:

- i. Central Lancashire Strategic Housing and Economic Land Availability Assessment (SHELAA) (February, 2025);
- ii. Central Lancashire Local Plan Preferred Options – Chorley Site Profiles (December 2022);
- iii. Green Belt Study (October, 2022).

Central Lancashire Strategic Housing and Economic Land Availability Assessment (February, 2025)

- 2.27 As part of the evidence base for the Regulation 19 Draft Plan, the Central Lancashire authorities conducted a land availability assessment for both housing and economic development uses. The Central Lancashire SHELAA provides a complete audit of available land by identifying all the sites available for development within Central Lancashire.
- 2.28 The site was not assessed as part of the SHELAA, however several sites adjacent or in very close proximity to the site were assessed, including the sites directly to the south (references EC5.5 and HS2.11) and to the south-west of the site (EC2.1) which are proposed allocations (for mixed-use, housing and employment, respectively), and identified as being suitable, available and achievable.
- 2.29 The mixed-use site immediately to the south of the site (reference EC5.5) is proposed for allocation for 100 dwellings and 6.7 hectares of employment land. The housing site south of EC5.5 was (reference HS2.11) is proposed for allocation for 246 dwellings, described as being located within the Key Service Centre of Chorley where there is a good range of services and facilities.

Local Plan Preferred Options (December, 2022)

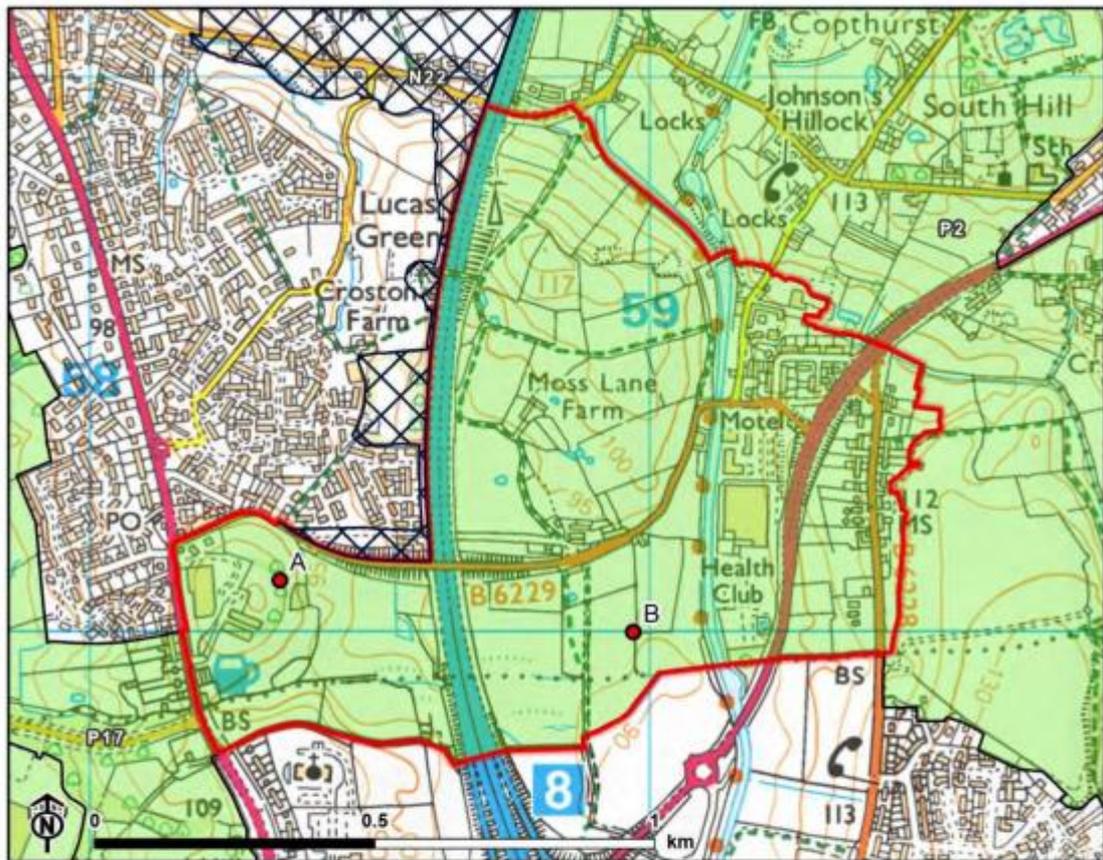
- 2.30 In advance of the Regulation 19 Draft Plan, Central Lancashire published their preferred options in December 2022.
- 2.31 The site was not assessed within the Local Plan Preferred Options. The site immediately south was selected as a Preferred Option (Site Profile 58, Reference 19C415, 19C161, 'Botany Bay/Great Knowley, Blackburn Road) for residential development, found to be suitable, achievable and available with no known constraints. The site to the south of that was also selected as a Preferred Option for residential development (Site Profile 13, Reference 19C243x, 19C161, 'Great Knowley').

Green Belt Study (October, 2022)

2.32 LUC was commissioned by the three Central Lancashire local authorities to undertake strategic assessments of how land in the area contributes to the Green Belt purposes, demonstrates valued landscape characteristics, and provides landscape settings which are important to the character of settlements.

2.33 The site was assessed within the Green Belt Study, as part of Parcel P1, shown in Figure 3 below.

Figure 3: Green Belt Study Parcel P1



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- P1
- Neighbouring parcel
- Central Lancashire boundary
- Neighbouring Local Authority
- Green Belt
- Location referenced in assessment text
- Policy BNE3 and G3: Safeguarded land

2.34 The description of Parcel P1 states "To the east of the M61, there is a larger area of residential and commercial development either side of the A674 Millenium Way that is too

developed to make any contribution to Green Belt openness". The site sits directly east of the A674, adjacent to the residential and commercial development referred to in the description.

2.35 The parcel is assessed against the five Green Belt purposes as follows:

- Parcel P1 was assessed to have a significant contribution to Purpose 1, checking the unrestricted sprawl of large built up areas, as the parcel is directly adjacent to both Whittle-le-Woods and Chorley built-up areas. The M61 was identified as a strong boundary feature that creates a strong distinction between the east of the parcel and the inset area of Whittle-le-Woods.
- The parcel was assessed to have a significant contribution to Purpose 2, preventing neighbouring towns from merging. The parcel was identified to be within a very narrow gap between Whittle-le-Woods and Chorley however, land to the east of the M61 is peripheral to this very narrow gap.
- The parcel was assessed to have a significant contribution to Purpose 3, assisting in safeguarding the countryside from encroachment. The assessment stated that although there is some residential and commercial development, the parcel generally has rural uses. The land to the east of the parcel and north of the B6229 (not applicable to the site which is the subject of these representations) was identified to be the most sensitive, with development in these parts of the parcel to be significant encroachment on the countryside.
- The parcel was assessed to have limited / no contribution to Purpose 4, preserving the setting and special character of historic towns.
- All of the parcels assessed were considered to make an equal contribution to Purpose 5, assisting in urban regeneration by encouraging the recycling of derelict or other land.

2.36 Overall, the key considerations with regard to potential harm to the Green Belt purposes for Parcel P1 were concluded to be preventing sprawl of the large built-up area (Purpose 1), prevention of the coalescence of towns (Purpose 2) and safeguarding of the countryside from encroachment (Purpose 3). However, it is clear from the assessment set out above, that certain parts of Parcel P1 were considered more sensitive than others, with the area to the east of the Parcel adjoining the A674 being a less sensitive area due

to the existing development and being peripheral to the gap between Whittle-le-Woods and Chorley due to the strong boundary of the M61.

- 2.37 The assessment also stated that a strategic scale release within this Parcel P1 would leave little justification not to also release the washed over development to the east (which is directly adjacent to the site which is subject to these representations). It stated that this area between Great Knowley and South Hill is developed to an extent that it makes little contribution to Green Belt purposes. The site sits within this identified area. Furthermore the assessment noted that between the land within the southeast parcel (map point B) and yet undeveloped inset area of Chorley to the south makes a weaker contribution to preventing sprawl of the large built-up area and preventing encroachment on the countryside.

Summary

- 2.38 In summary, Asteer strongly recommend that Central Lancashire consider revisiting its proposed housing requirements and growth strategy in the context of the national policy direction, to ensure that, as a minimum, it is seeking to meet its housing needs throughout the Plan Period. Our comments on the Regulation 19 Plan are set within this context.

3 COMMENTS ON THE REGULATION 19 LOCAL PLAN

3.1 This section provides comments on the emerging spatial strategy, strategic policies and land allocations in the Regulation 19 Plan, as they relate to the national policy context.

Policy SS1: Spatial Strategy: Development Patterns

3.2 Policy SS1 states that new housing, employment and commercial growth will be focussed on the most sustainable locations in Central Lancashire. This policy sets out that new development will be focussed within settlement boundaries and on allocated sites and outside of these, land will be regarded as open countryside.

3.3 The purpose of Policy SS1 is to shape and support the achievement of a sustainable pattern of development in Central Lancashire over and beyond the plan period.

3.4 The Landowner supports focussing new growth on the most sustainable locations in Central Lancashire as set out by Policy SS1. However, the purpose of Policy SS1 is 'to shape and support the achievement of a sustainable pattern of development in Central Lancashire over and beyond the plan period'. By failing to plan for the new minimum housing requirement, it is considered that Central Lancashire is not supporting the achievement of a sustainable pattern of development over and beyond the plan period.

3.5 The plan has not been positively prepared in this regard as the current spatial strategy fails to meet the new housing requirements for the three local authorities, and particularly underdelivers for Chorley, therefore not supporting the sustainable development over and beyond the plan period.

Policy SS2: Spatial Strategy: Settlement Hierarchy

3.6 The Landowner strongly supports Policy SS2 which sets out that the scale and location of development growth and supports investment across Central Lancashire that will reflect the settlement hierarchy, within which Chorley is designated as a Tier 2 settlement. Tier 2 settlements will be the secondary focus for development, complementing the role of the Tier 1 Urban Area (Preston Urban Area), delivered through allocated sites in and adjoining the towns, windfall sites and town centre renewal activity to meet development needs. The site is considered to be part of the Chorley, as the proposed allocations immediately adjacent are identified within Chorley as is the settlement of Great Knowley which is in close proximity to the site.

3.7 However, there is a misalignment in the Local Plan's spatial strategy that should be remedied by an uplift to the housing requirement, to meet the Standard Method Local

Housing Needs across the authorities. This is particularly pertinent for Chorley, which is designated as a Tier 2 settlement and a secondary focus for growth, only after the Preston Urban Area, yet only plans to meet 59% of its housing requirements.

- 3.8 A more balanced approach towards housing growth is required to ensure that Chorley is able to meet its Local Housing Need as a minimum.

Policy HS1: Strategic Policy: Scale of Housing Growth and Distribution of Housing Requirements

- 3.9 Policy HS1 sets an overall housing requirement of 1,314 dwellings per annum which was a slight increase from previously to ensure the Regulation 19 Plan meets 80% of the Government's new Standard Method Local Housing Need (1,643 dpa) in line with the Transitional Arrangements set out in Annex 1 of the NPPF.
- 3.10 This approach does not demonstrate that the Plan has been positively prepared in its attempt to meet identified housing needs. It is clear that Central Lancashire has provided the absolute minimum (80%) to accord with the Transitional Arrangements for plan making, without regard to holistically planning for the homes that are needed across the authorities within the Plan period up to 2041.
- 3.11 Policy HS1 sets out the spatial distribution of the housing requirement across the three authority areas, which sets out a requirement of 334 dpa in Chorley, which is significantly below the Standard Method LHN of 564 dpa. The proposed requirement for Chorley is also below the identified housing need in Chorley Council's Housing Demand and Need Assessment ("HDNA") (December 2024) which identifies a need of 410 dwellings per year.
- 3.12 Central Lancashire should consider adopting a new housing requirement to fully plan for its need across the Plan Period – recognising the significant implications it could have once the Local plan is more than five years old (as discussed in the previous section).
- 3.13 Therefore, Policy HS1 is not justified, positively prepared, and not consistent with national policy.

Policy HS2: Housing Allocations Chorley

- 3.14 Policy HS2 allocates land to the south of the site which is the subject of these representations for housing under reference HS2.11 'Great Knowley, Chorley'. Site HS2.11 is expected to deliver 246 dwellings across 9.12 ha of land.

Policy EC5: Mixed Use Allocations Chorley

- 3.15 Policy EC2 allocates land to the immediate south of the site which is the subject of these representations for mixed use development under reference EC5.5 'Botany Bay/Great Knowley, Blackburn Road, Chorley'. Site EC5.5 is expected to deliver 100 dwellings across 5.44 ha along with 6.7 ha of employment land, consisting of E(g), B2 and B8 uses.
- 3.16 The Landowner considers that Central Lancashire and Chorley should consider the site to west of Blackburn Road as a logical extension to the allocations EC5.5 and HS2.11 as well as being suitably located between these and the existing residential and commercial development immediately north, either side of the A764. The site would support both the residential and commercial growth in this location and maximise the potential to fully link employment and housing growth in a sustainable way.
- 3.17 As set out throughout these representations, the identification of 334 dpa within Chorley is not consistent with national policy which sets the Standard Method Local Housing Need at 564 and it does not demonstrate that the Plan positively prepares for sustainable growth within and beyond the plan period to 2041.
- 3.18 The site to the west of Blackburn Road provides an opportunity to deliver high quality homes affordable and market homes in a suitable location, between existing residential and commercial development and allocated land for mixed-use development.

Summary

- 3.19 The Landowner considers that the CLLP Regulation 19 Draft has not been positively prepared, justified or consistent with national policy and therefore is currently unsound. The overall development strategy and spatial strategy needs to be revisited, as set out above, and as a minimum, the Central Lancashire authorities need to meet the new Local Housing Needs. In particular, the spatial strategy needs to be more balanced by allocating more growth to Chorley. The next section sets out the case for allocating the site to the west of Blackburn Road which will contribute to housing growth in Chorley.

4 CASE FOR ALLOCATION

4.1 This section summarises the case for allocating the site to the west of Blackburn Road, including:

1. The appropriateness for allocation / development in the Green Belt in line with policy to address local housing need;
2. The demonstrable deliverability of the site; and
3. The significant benefits that could be generated by delivering housing that meets Chorley and Central Lancashire's needs.

Policy Justification

4.2 The land to the west of Blackburn Road offers an opportunity to bring forward a deliverable site early in the Plan Period that will support the holistic growth of Chorley to support the mixed-use and residential allocations adjacent to the site. This will provide deliverable market and affordable homes in line with the Government's policy direction and deliver a range of economic, social and environmental benefits on a site which will contribute to meeting the needs of Chorley and Central Lancashire.

4.3 As set out earlier, the Regulation 19 Plan does not provide for the number of new homes required across Central Lancashire, and particularly in Chorley, which is inconsistent with national policy and does not demonstrate that they are planning to accommodate their housing needs across the plan period.

4.4 Section 3 of these representations sets out the implications of the new NPPF for the Central Lancashire Authorities which are pertinent to the emerging Local Plan strategy, including:

- Increased housing requirements (of which Central Lancashire are only meeting 80% of, and Chorley is only meeting 59% of);
- Requirement for Local Planning Authorities to maintain and publish a five year housing land supply annually;
- The introduction of 'Grey Belt'.

4.5 Chorley published their five year housing supply statement in May 2024, identifying a 2.9 year deliverable housing supply across the period of 2024-2029, against an annual

housing requirement of 506 dpa. Even if the emerging Local Plan is adopted as drafted in the Regulation 19 version, which includes a housing requirement of 334 dpa for Chorley, this will only remain up-to-date for five years, following which Chorley will be required to adopt the new housing requirement of 564 dpa. If the requirement cannot be met, the presumption in favour of sustainable development will be engaged and Chorley will be open to speculative applications rather than planned development.

- 4.6 Furthermore, this will impact the amount of affordable housing that is able to be delivered within Chorley. The Housing Need and Demand Assessment (2022) for Chorley identified an overall need for 1,390 affordable homes, with a net shortfall of 113 per year.
- 4.7 For the CLLP to be positively prepared, justified, effective, and consistent with national policy, it needs to identify enough sites to wholly meet its new housing requirements across the three authorities as a minimum.

Grey Belt

- 4.8 The site to the west of Blackburn Road is strategically located to contribute to this need and not considered to be 'inappropriate development' in the Green Belt, following the introduction of 'Grey Belt' at Paragraph 155 of the NPPF. The following provides an assessment of the site against Grey Belt criteria as set out in the Planning Practice Guidance ("PPG") (published 27th February 2025).
- Purpose A relates to the sprawl of large-built up areas which applies to Chorley. However, the site is located on the edge of Chorley, sandwiched between mixed-use and residential allocations to the south, and existing residential and commercial development to the north. Therefore the site cannot be considered to contribute to sprawl as it is enclosed by significant existing and planned future developments, and as such has limited or no contribution to Purpose A.
 - Purpose B relates to the merging of towns. Given that Great Knowley and the allocated sites to the immediate south of the site are included within the Chorley settlement boundary and the existing development to the north of the site is identified as Green Belt (not within any settlement boundary), the site is not considered to form a gap between towns. The site is approximately 700m south-west of Wheelton, which is a village and therefore not relevant for Purpose B. Therefore the site is considered to have no contribution to Purpose B.

- Purpose D is to preserve the setting and special character of historic towns. The site is not adjacent to any historic towns and therefore has no contribution to Purpose D.

4.9 In terms of the remaining Green Belt purposes:

- Purpose C relates to assisting in safeguarding the countryside from encroachment. As the site is enclosed between proposed residential and commercial allocations and existing residential and commercial development, it is considered that the site has a limited contribution to safeguarding the countryside from encroachment.
- Purpose E relates to assisting urban regeneration, by encouraging the recycling of derelict and other urban land. It is considered that all Green Belt sites have an equal contribution to this purpose.

4.10 Therefore, in line with national policy, the development of the site can be considered 'not inappropriate' in the Green Belt and will contribute to Chorley and Central Lancashire's housing need which currently fall short of meeting their local needs.

Deliverability

4.11 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.

4.12 There are no environmental or technical constraints that would prevent the development of the site, subject to suitable mitigation and a sensitive approach to design, as summarised below.

Site Technical & Environmental Considerations

Access and Sustainability

4.13 The site is in a sustainable location and well connected to existing services and facilities via public transport. There are two existing vehicular access points located on Blackburn Road to the east of the site. Bus stops are located on the edge of north-eastern boundary on Blackburn Road with regular services to Chorley, Blackburn (and Blackburn Bus Station), and Abbey Village (No. 2), Birkacre (No. 791), Weldbank (No. 707), Brinscall (No.

463), and Crosse Street (No. 795 & 796). Additionally, Chorley Train Station is located 2.51km to the south-west of the site.

- 4.14 The Landowner has a professional team on board to progress further detailed highways assessment so as to understand the design of a future access and to understand any impacts on highways capacity, as the Local Plan is progressed. Subject to further highways assessment, there are not considered to be any accessibility constraints preventing the site from being brought forward for development.

Ecology and Trees

- 4.15 There are no statutory ecological designations identified within or adjacent to the site. There are, however, non-designated features on the site which may hold ecological significance as habitats for protected species, specifically the grouping of trees across the central/southern area of the site.
- 4.16 The TPO map highlights that there are a group of protected trees (Entity ref: G1) across the south-west boundary of the site. The western and northern boundaries of the site are characterised by trees and vegetation which would be retained as part of any masterplan, where possible. The southern half of the site is characterised by scattered trees and vegetation.
- 4.17 Subject to further ecological assessment and appropriate mitigation, there are not considered to be any ecological or arboricultural constraints preventing the site from being brought forward for development.

Landscape and Visual

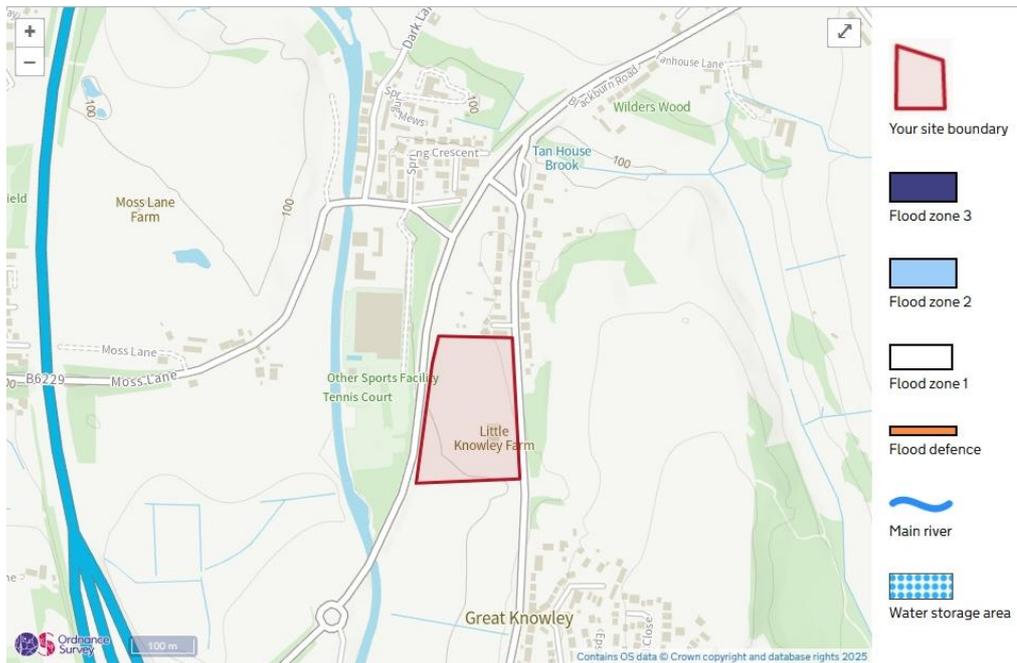
- 4.18 The site is visually contained by urbanising features on most sides, including the A674 to the west, beyond which lies existing commercial development and a proposed employment allocation. To the north of the site is existing residential development and the south of the site is proposed to be allocated for mixed-use development. The east of the site is bound by Blackburn road, beyond which there is mature trees and open fields – from which the views would be limited due to the significant tree coverage which provides screening towards Blackburn Road. Therefore, the visual envelope is limited due to the existing and proposed surrounding urbanising features and the development of the site would have a limited impact on the surrounding landscape to the east.

4.19 The Landowner has a professional team on board that will undertake Landscape and Visual Impact (“LVIA”) work as the Local Plan is progressed in order to support a robust assessment of LVIA, and the impact of development on the purposes of the Green Belt.

Flood Risk & Drainage

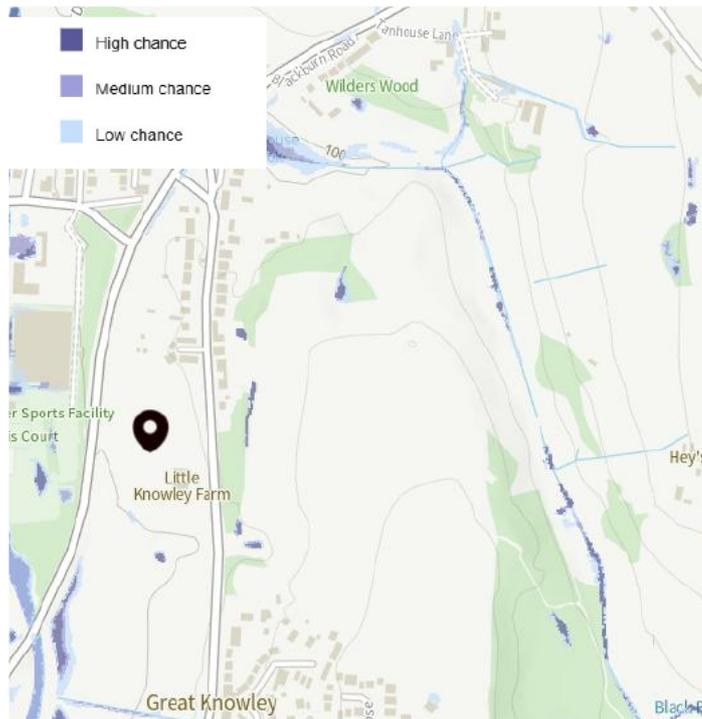
4.20 The entirety of the site is within Flood Zone 1, and at the lowest risk of flooding. As such, there are not considered to be any flood risk or drainage constraints that would prevent the site being brought forward for development.

Figure 4: Flood Risk Map for the Site



4.21 There are no areas of surface water flooding located within the site boundary. The majority of sites across Central Lancashire suffer from issues relating to surface water flooding and drainage. Given that the site does not suffer from any surface water issues, it should be sequentially preferable to alternative sites that have areas of flood risk and should be considered as a sustainable location for development.

Figure 5: Surface Water Flooding Map Extract



Heritage

4.22 There are no heritage constraints on the Site. The nearest Listed heritage asset is the Grade II Moss Lane Bridge (List entry: 1073094), located c.250m to the north-west of the Site. Therefore, there are no heritage constraints preventing the site from coming forward for development.

Agricultural Land

4.23 The land is currently an agricultural field, and has been classified as Grade 3 agricultural land which is defined as ‘moderate quality agricultural land’.

Public Rights of Way

4.24 There are no Public Rights of Way (“PRoW”) running through, or adjacent, to the site.

Key Benefits

4.25 The allocation of the site would support new housing in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of Chorley and Central Lancashire. The delivery of the site will provide 122 market and affordable homes along with significant benefits to the Borough which are summarised as follows:

Economic Benefits

4.26 The development of the site for housing will have considerable economic benefits, both from their construction and occupation. The key economic benefits will include:

- Providing jobs and generating investment during the construction phase of the development, specifically through construction costs, full-time equivalent (“FTE”) construction jobs and an increase in Gross Value Added (“GVA”).
- Providing residential development in a location adjacent to existing and planned (allocated) residential and commercial development which will maximise the potential of this location and link residential and commercial development in a sustainable way.
- Providing long term occupational / operational benefits, including new resident expenditure, attracting new residents to Chorley, Great Knowley and Whittle-le-Woods, generating flow on and supported jobs and, overall, generating increased economic input in the Borough.
- Generating revenue for the Local Authority, with a development of new homes generating revenue through Council Tax, New Homes Bonus, and Section 106 contributions.
- Finally, underpinning the growth opportunities in Chorley by providing the type, quality, and spatial distribution of homes in the Borough that will support the employment and residential allocations adjacent to the site at Botany Bay.

Social Benefits

4.27 The delivery of the site will have clear social benefits for existing and future residents, in terms of providing a better choice of housing, improving access for amenities and meeting a variety of identified housing needs. The key social benefits include;

- Providing high quality homes to meet the needs of the Borough’s existing and future residents, supporting the future growth of the Borough.
- Providing affordable housing in line with policy requirements (up to 50%). Thus, the proposed development would make a positive contribution to meeting affordable housing need (as well as offering the potential to meet other specialist housing needs).

- Delivering new and accessible amenity spaces and green infrastructure to benefit existing and future residents.
- Delivering a 10% biodiversity enhancement, Green Belt compensation and increased public access to the Green Belt.

Environmental Benefits

4.28 The development of the site has the potential to uplift the biodiversity, accessibility and environmental value of the site. Key environmental benefits include:

- The delivery of a high quality, well-designed development, in accordance with Paragraphs 131 and 135 of the NPPF (2024).
- The site will create new habitats for a range of species and will seek to provide biodiversity net gain on-site.

Summary

4.29 This section has set out the case for the allocation of the site, in the context of national planning policy, the Council's housing supply, the inherent deliverability of the site and the benefits that could be generated. It is clear that the site is suitable to provide a much-needed contribution to addressing the challenges of housing and affordable housing shortages. Given that the site has no technical constraints which would preclude the development of the site, and furthermore, has the potential to deliver a range of economic, social and environmental benefits to Chorley and wider Central Lancashire, the site is positioned as both suitable and sustainable for allocation within the CLLP.

5 CONCLUSIONS & RECOMMENDATIONS

5.1 These representations set out in detail the Landowner's position on the Regulation 19 Plan, which we consider to be flawed in its spatial strategy and approach to housing growth. **As such, we consider that the Regulation 19 Plan, as drafted, is unsound – and not positively prepared, effective, justified, and aligned with Government policy.** We respectfully request that Central Lancashire considers the following recommendations to support a sound Local Plan:

1. As part of the Overall Development Strategy, **Central Lancashire should revisit its evidence base and adopt a higher housing requirement, in the context of new national policy and significantly increased housing requirements across the Central Lancashire Authorities.**
2. As part of the Spatial Strategy, **Central Lancashire should revisit its evidence base and pursue a more balanced approach to housing growth particularly with regard to Chorley's unmet housing needs.**
3. **Chorley should allocate a deliverable and genuine supply of market and affordable housing, reflecting as a minimum, the Standard Method Local Housing Need.** This is important to underpin the growth of Chorley and to ensure that current and future residents continue to have a choice of housing options without having to relocate to Preston or South Ribble whom are providing for Chorley's unmet need in the Regulation 19 Plan.
4. **Central Lancashire should revisit its evidence base in relation to site selection, including its Green Belt Assessment,** to provide a robust review of the Green Belt in line with the new NPPF.
5. **Central Lancashire should allocate the site to the west of Blackburn Road for up to 122 dwellings, as a suitable and logical extension of the mixed-use and residential allocations directly south of the site.** The site offers an opportunity to bring forward a deliverable site early in the plan period that will deliver a range of economic, social and environmental benefits on a site that will contribute to meeting the housing requirements of Chorley. The site could provide affordable housing in line with policy, that is aligned to the Borough's waiting lists in terms of product and tenure, providing the right homes for families, looked after children and older people.

6. **If the site west of Blackburn Road is not allocated, as a minimum, the Council should consider safeguarding the site**, to ensure that an adequate supply of market and affordable homes is held in reserve to meet the growth needs of the Borough throughout and beyond the plan period.

5.2 The Landowner would welcome ongoing engagement with the Council as a submission plan is prepared and has a team of technical and professional experts to underpin the merits of this site through to Local Plan examination. Any feedback, engagement or discussions in relation to this site can be arranged via Asteer, using the contact details below:

[Redacted]

Director

[Redacted]