

Central Lancashire Local Plan Publication (Regulation 19) Draft

Representation on behalf of Northern Trust Land Ltd Policies HS2 to HS4 Housing Allocations.

1. De Pol Associates are retained by Northern Trust Land Ltd to submit representations to the Publication (Regulation 19) draft of the Central Lancashire Local Plan 2023-2041 (CLLP). This representation relates to policies HS2 to HS4 which identify the housing allocations for Chorley, South Ribble and Preston. It should be considered alongside a statement by Stantec titled Housing Land Supply Assessment dated April 2025 which has been submitted alongside this representation.
2. This representation raises the following issues and refers to the Stantec report where relevant.
 - Insufficient Housing Allocations in policy HS2 to HS4
 - Housing allocations do not reflect sustainability objectives
 - Specific Housing Allocation HS2.10 has been unnecessarily reduced in size compared to the original CH/HS1.22 allocation in the Regulation 18 Preferred Options.
 - Suitable alternative sites for allocation
3. Attached to this representation as appendices are:
 - Appendix 1: Landscape Representation by FPCR relating to allocation HS2.10
 - Appendix 2: Illustrative layout relating to allocation HS2.10
 - Appendix 3: Representation to Preferred Options re potential allocations at Eccleston
 - Appendix 4: Representation to Preferred Options re potential allocation at Croston
 - Appendix 5: Representation to Preferred Options re potential allocation at Wheelton
 - Appendix 6: Representation to Preferred Options re potential allocations at Euxton

Insufficient Housing Allocations

4. NPPF23 paragraph 69 states that planning policies should identify a supply:
 - Specific, deliverable sites for years one to five of the plan period (with an appropriate buffer);
and
 - Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan



4.1. The NPPF23 Glossary defines deliverable as follows:

‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.’*

5. It is considered that the claimed deliverable housing land supply identified in the CLLP is exaggerated and overestimated for the following reasons.

- Unrealistic reliance on large windfall development sites coming forward in Chorley and South Ribble.
- An over optimistic anticipated delivery on certain strategic sites where housing delivery is likely to extend beyond the plan period.
- Reliance on historic site allocations which have been carried forward into the new Plan despite little evidence to demonstrate that the constraints which prevented these sites from previously coming forward have been overcome. Also a general lack of evidence to confirm that some allocations are capable of addressing known constraints.
- Sites which do not meet the NPPF test of deliverability being relied upon to demonstrate an adequate deliverable housing supply for the first five years of the plan.

6. The above issues are expanded upon in the Housing Land Supply Assessment undertaken by Stantec on behalf of the aforementioned consortium, which is attached with this representation. In summary, and irrespective of the representations relating to the overall



housing requirement in policy HS1 being too low and the re-distribution of Chorley's housing need to Preston and South Ribble being unsound, it is not considered that the CLLP is allocating sufficient land to meet the aforementioned NPPF paragraph 69 requirements even based on the policy HS1 requirement. It therefore fails to meet the test of soundness as it is not positively prepared, justified or consistent with national policy.

Housing Allocations do not reflect sustainability objectives

7. Paragraph 4.1 of the Site Selection paper states that the housing allocations were decided upon taking into account findings of the SHELAA assessment of sites and the proposed spatial strategy and settlement hierarchy. As already highlighted in the Northern Trust representation to policies SS2 and HS1 it is considered that the proposed distribution of housing and allocations have been unduly influenced by what sites are available outside the Green Belt rather than an overarching strategy, with little account of whether they represent the right level of growth for a settlement in accordance with the suggested hierarchy and sustainability objectives. This is contrary to NPPF objectives.

Specific Housing Allocation HS2.10

8. Northern Trust Land are promoting land off Heapey Road, Chorley which was originally part of proposed Chorley housing allocation CH/HS1.22 in the Regulation 18 Preferred Options. The original proposed allocation is shown below which extended to 24.41ha and had an identified capacity of 383 dwellings. The majority of the land in the original allocation is being promoted by Castle Green Homes who submitted a planning application for 200 dwellings on their part of the site in May 2022 under ref. 22/00538/OUTMAJ, which was subsequently withdrawn. Northern Trust Land submitted an outline application for 130 dwellings on the remainder of the draft allocation in March 2021 under ref. 21/00253/OUTMAJ.

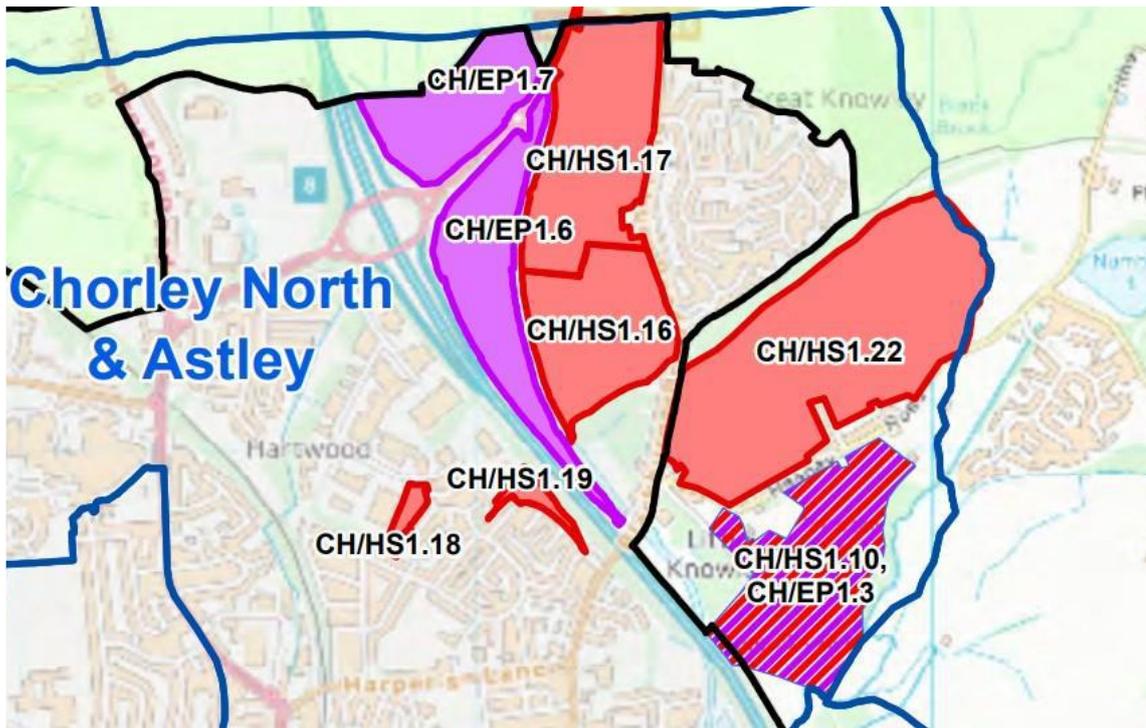


Fig 1: Proposed allocations in Regulation 18 Preferred Options Plan

9. In the Regulation 19 Publication Plan this housing allocation, now referred to as HS2.10, has been reduced in size to exclude the eastern part of the original allocation which comprises the Northern Trust land and part of the Castle Green Homes land. The Plan now refers to the allocation having a reduced capacity of 150 dwellings and the new allocation is shown below.

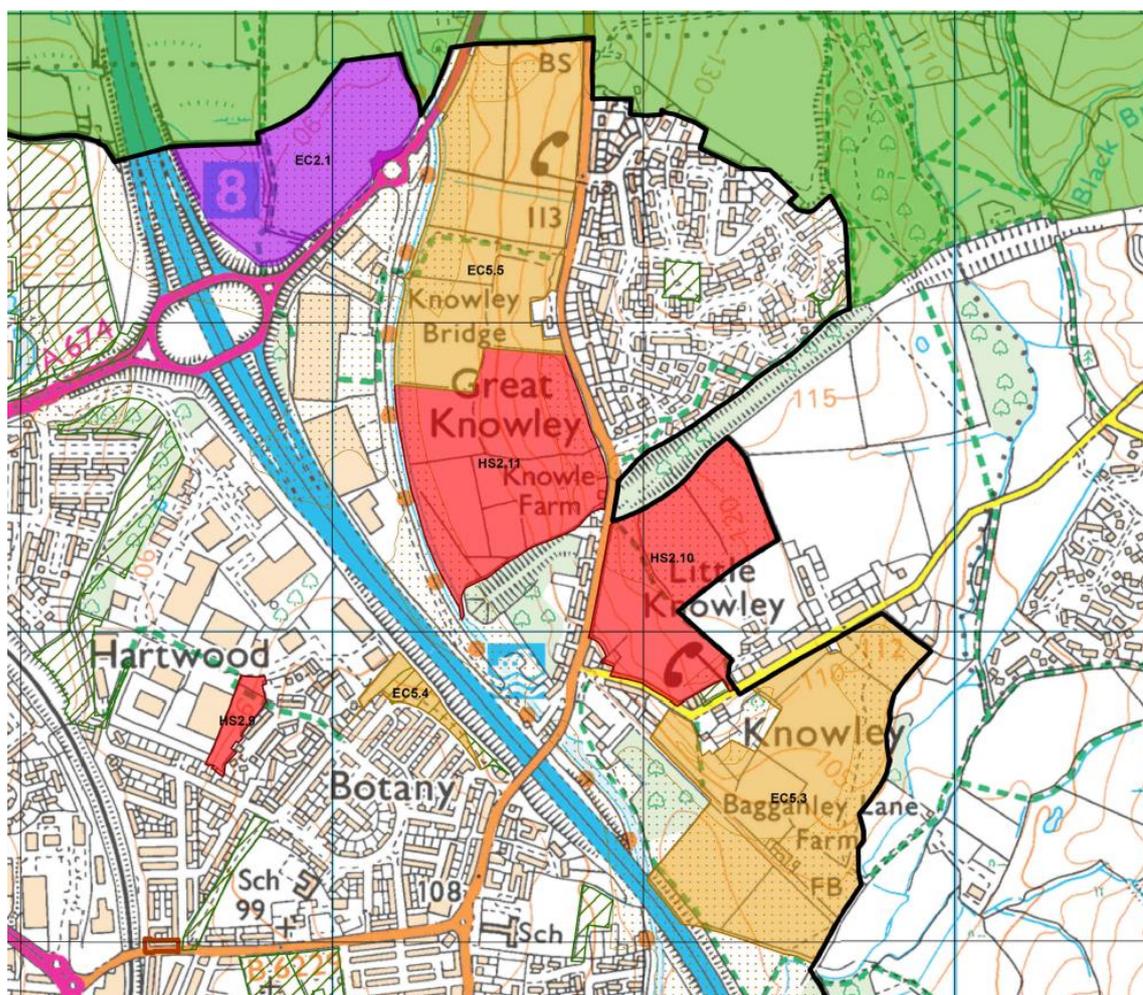


Fig 2: Allocations in the Regulation 19 Publication Plan

10. The land excluded from the original draft allocation is not located within the Green Belt and there are no insurmountable technical constraints to its development, which was established in the planning applications submitted by Northern Trust and Castle Green Homes. The only stated justification for the reduction in size of this allocation is a comment in the Preferred Options Regulation 18 Consultation Statement that *“The site area has been significantly reduced to avoid significant impact on the landscape character.”*

11. Attached at Appendix 1 to this representation is a Landscape statement by FPCR specifically relating to the land which has been excluded from allocation HS2.10. It highlights that the LUC Open Land Designations Study completed for the Central Lancashire Local Authorities in 2022 shows the site lying outside the areas identified as *“Above ordinary”* and therefore within *“ordinary”* landscape areas and that an LVA completed for application 21/00253/OULMAJ concludes that it and its immediate context was of medium landscape value which was not disputed by the Council. The Landscape representation goes on to highlight how the site could



be developed in a manner which would be in line with existing built form along Heapey Road and would, in conjunction with the proposed allocations in the Regulation 19 Plan, provide a logical and appropriate settlement form with little impact beyond the site itself. To this effect an illustrative masterplan has been prepared and is attached at Appendix 2 to this representation. This shows the Castle Green Homes layout submitted as part of their previous withdrawn application together with an illustrative layout for the Northern Trust Land site. This differs from the illustrative layout submitted with aforementioned Northern Trust outline application as the proposed housing area has been reduced to better reflect the Castle Green Homes layout.

12. The attached Landscape Representation acknowledges that the introduction of a new residential development in this location would result in permanent changes in the landscape character from a pastoral one to residential with open space. However, it highlights that the effect on landscape character would be limited to the site and its immediate surroundings and would be no greater than would be expected for the development of a green field site. That given the limited and contained nature of these impacts and the degree of influence of settlement and infrastructure across the Character Area there would likely only be a Minor adverse effect at completion. With the mitigation measures considered in the longer term the effects will be Minor/Negligible. Ultimately it is disputed that the original extent of this allocation needs to be reduced in scale as shown on the Regulation 19 Plan due to impact on landscape character, especially in the context of the amount of greenfield settlement extensions identified for allocation in the CLLP and the fact that the CLLP is not presently meeting Chorley's identified housing need within Chorley Borough.

13. It is acknowledged that aforementioned Northern Trust application was ultimately refused on appeal¹ which progressed by way of written representations, where landscape impact was the only reason for refusal. As highlighted in the attached Landscape representation when considering landscape and visual impact the appeal inspector gave little weight to the draft CLLP and viewed the application site in isolation rather than part of a wider allocation. This led to the inspector considering the development to be at odds with the prevailing more pastoral and natural surrounds of this part of the countryside and not reflecting the contained linear development patterns of adjoining existing development. This does not apply if the various proposed allocations in the Regulation 19 plan are taken into account, where retained allocation

¹ Pins ref APP/D2320/W/23/3314846



HS2.10 will bring development at depth up to the west of the site and the mixed use allocation south of Heapey Road (EC5.3) would influence the local landscape character in that direction. In this context the additional development of land to the east of proposed allocation HS2.10 would have very little effect on the local landscape character. In this scenario the immediate area would be characterised by modern residential development to the west and the built form would no longer just be “*linear development patterns.*”

14. If the subject land were allocated along with the currently proposed allocation HS2.10 it would be contained by residential development to the west, and south, and by woodland along the rail line to the north. The western edge would be more open, but with a suitable masterplan a large area of green infrastructure could be provided to establish a suitable transition to the wider countryside and a valuable environmental and amenity feature. The Landscape representation highlights how in these circumstances a development reflecting the attached illustrative masterplan, which differs to the scheme considered at the appeal, makes the conclusions of the appeal inspector no longer be appropriate.
15. In summary it is considered that there is no landscape or visual reason why allocation HS2.10 needs to exclude the adjacent land to the east which was originally included in the allocation at the Regulation 18 Preferred Options stage. This is especially in the context of the CLLP being reliant on similar greenfield settlement extensions to meet housing need and the proposed allocations not presently meeting Chorley’s identified housing need. Appendix 4 of the CLLP already includes key development considerations for some of the proposed housing allocations and if considered necessary could therefore also refer to the need to retain the eastern part of this extended allocation for open space / biodiversity enhancement as per the attached illustrative masterplan. Given the shortage of housing allocated in Chorley to meet the Borough’s needs it is considered that this allocation should be extended as per the original allocation in the Preferred Options.

Suitable Alternative Sites for Allocation

16. Representations were submitted on behalf of Northern Trust Land to the Regulation 18 Preferred Options identifying other suitable sites for housing allocation, albeit requiring a review of the Green Belt. This includes the following sites and the submitted representations are attached:



- Three sites at Eccleton (Appendix 3)
 - Land at Croston (Appendix 4)
 - Land at Wheelton (Appendix 5)
 - Land at Euxton (Appendix 6)
17. These sites have been discounted in the SHLAA solely because of their location within the Green Belt with the CLLP having clearly been prepared to distributing housing within Central Lancashire based on available sites outside the Green Belt rather than necessarily the most sustainable locations. This is despite it necessitating a large proportion of Chorley's housing need having to be redistributed to Preston and South Ribble.
18. For reasons already highlighted in the representation to policy HS1 it is considered that there should be a Green Belt review in Chorley and the above sites represent examples of land in sustainable locations on the edge of suitable settlements where the actual impact on the purposes of the Green Belt would be limited. These are sites which would help Chorley to meet its housing need in a sustainable manner.



APPENDIX 1

FPCR | environment
& design



LANDSCAPE REPRESENTATIONS

Client

Northern Trust Land Ltd

Project

Heapey Road Chorley

Date

April 2025

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1.0 INTRODUCTION

- 1.1 This report accompanies representations made by De Pol Associates to the Central Lancashire Local Plan (2023-2041), in respect of Land of Heapey Road Chorley.
- 1.2 The representations have been prepared by FPCR landscape consultants who have been involved with the site since October 2020 when asked by the client to advise on landscape matters. The FPCR landscape team has subsequently worked on the site, having produced an LVA for a planning application in 2021, for up to 130 dwellings (21/00253/OULMAJ) which was subject to a None Determination appeal, and was subsequently dismissed (Appeal Ref APP/D2320/W/23/3314846). This scheme covered development on a larger part of the site, from the area now being promoted for allocation.
- 1.3 This Representation describes the landscape context for the site, the context should the proposed allocations in the Central Lancashire Local Plan be confirmed, and the likely landscape and visual effects arising from development on the site. Commentary is also provided on how the situation has changed since the Inspector's decision on the earlier planning application (Appeal Ref APP/D2320/W/23/3314846).

2.0 THE PROPOSED SITE – LOCAL CONTEXT AND CHARACTER

The site and existing context

- 2.1 The site lies within Knowley, Lancashire, north of Heapey Road. Knowley and is located on the north eastern edge of Chorley, located approximately 1km south east of Junction 8 of the M61.
- 2.2 Heapey Road connects the B6228 in the east to Tithe Barn Lane in the west. To the north west of the site lies Great Knowley. To the southeast of the site lies the residential settlement off Kittiwake Road. Residential development exists south of the site along Heapey Road and extending north from there to Paradise Street. Within the area the settlement pattern is varied, with some linear development of generally older properties such as along Heapey Road, and with blocks of more modern housing estate type development, including at Great Knowley to the north and at Kittiwake Road to the east. This all contributes to the character of the surrounding area.
- 2.3 Farmland in the area is largely pastoral, with fields often of irregular size and bound by mature tree lines and hedgerows. However, some land to the north east, east, and south east is cultivated. The numerous brooks and watercourses leading to the River Yarrow in the south give rise to many linear woodlands. There is a network of reservoirs to the east and south of Knowley including Anglezarke Reservoir, Yarrow Reservoir and Upper Rivington Reservoir.
- 2.4 Beyond residential settlements, there are scattered commercial/industrial estates and small business parks, mostly on the fringes of Chorley. The former retail centre Botany Bay is 500m east of the site. This site is currently being redeveloped for employment and mixed use.
- 2.5 The site itself is made up of two pastoral fields, bordered by Heapey Road to the south and Paradise Street to the west. The site boundary is shown on the aerial photograph below



- 2.6 A public footpath, PROW 9-2-FP21 crosses the site in a north south direction, at the eastern end of the site.

A Landscape Strategy for Lancashire (Landscape Character Assessment and Landscape Strategy)

- 2.7 Lancashire County Council published a study that consists of two separate reports, the Landscape Character Assessment (2000) and a Landscape Strategy (1999). These provide an assessment of the character of the County and should be read in conjunction with each other.
- 2.8 The Landscape Character Assessment (LCA) divides the county into Landscape Character Types (LCTs), and further into Landscape Character Areas (LCAs). The Site is located entirely within the 'Industrial Foothills and Valleys' (LCT6) and within this the 'West Pennine Foothills' (LCA6b)
- 2.9 The description of LCA 6b is repeated below,

“The rural area forms the rolling foothills to the West Pennine Moors. Although it has the same undulating landform, underlying geology and industrial influences as the Calder Valley, is it more rural in character. It is dominated by sheep grazed pastures and includes a number of designed landscapes, with associated country houses. The villages reflect their industrial basis with rows of terraces, and sandstone quarries are present. Urban influences include allotments, horse paddocks, street lighting and kerbs, electricity pylons, communication masts, golf courses, suburban housing and road signs. Evidence of past quarrying can be seen in the numerous remnant spoil heaps which are common landscape features, for example near

Withnell. The many public footpaths are an important recreational resource from which walkers may experience distance views of the urban conurbations stretching out below them."

- 2.10 The site includes pasture land and is also influenced by the rows of terraces, and urban influences are apparent.

Topography

- 2.11 The wider landscape is undulating and much of the local area varies between 80m and 150m Above Ordnance Datum (AOD). Landform to the west becomes gentler whilst landform to the east becomes more pronounced. To the north east, Heapey sits on higher ground at 170mAOD and to the south east Healey Nab sits on higher ground at 200mAOD. Knowley sits largely between approximately 100m and 120m AOD.
- 2.12 The site itself slopes from the north westerly corner at approximately 115mAOD towards the south easterly corner at approximately 100m AOD. The gradient is relatively even across the site.

Landscape Value

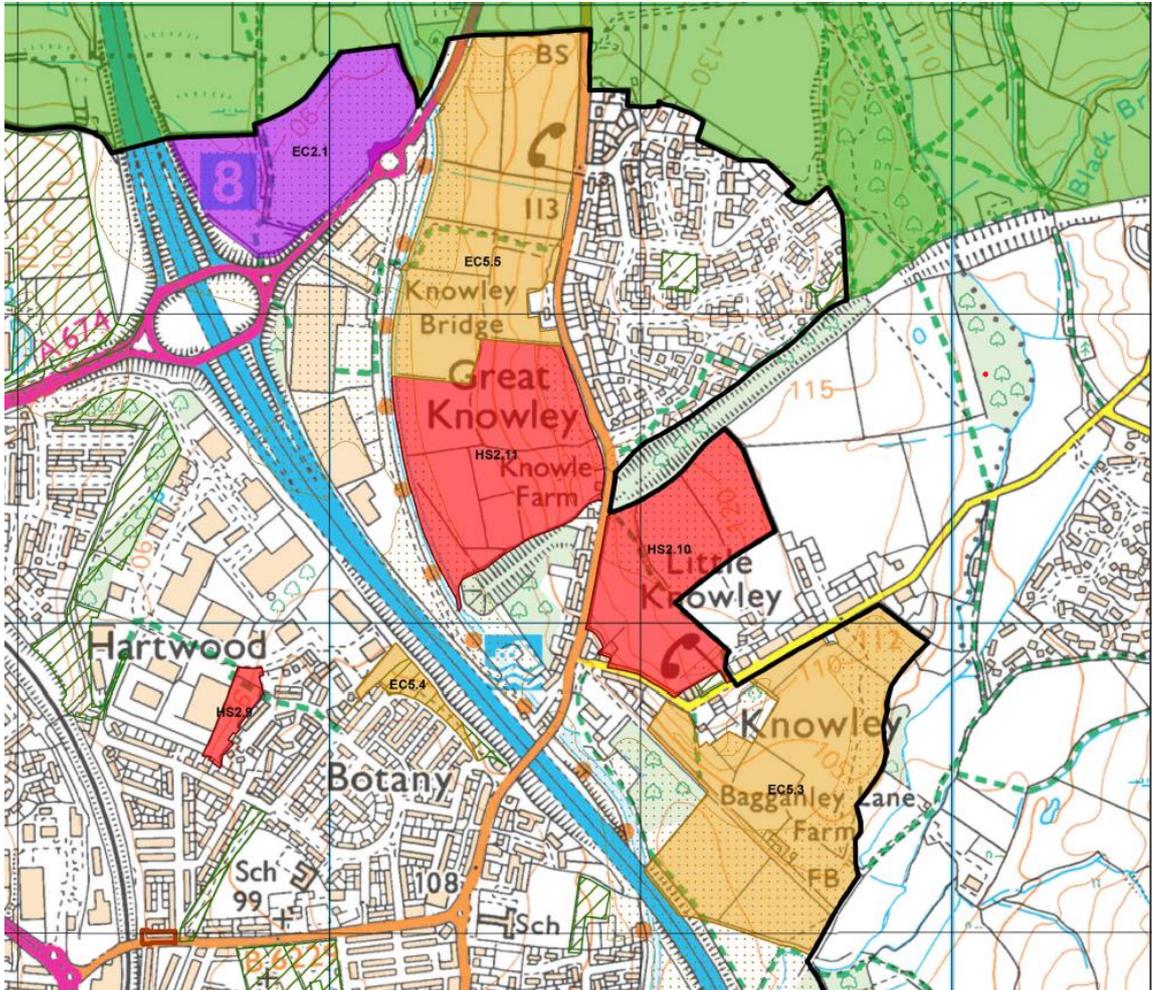
- 2.13 The LVA completed for application 21/00253/OULMAJ, included a section on Landscape Value, based on Landscape Institute guidance and concluded that the site and its immediate context was of "Medium" landscape value. This was not disputed by the council. This judgement is consistent with the LUC Open Land Designations Study completed for the Central Lancashire Local Authorities in 2022, which shows the site lying outside the areas identified as "Above ordinary" and therefore within "ordinary" landscape areas.

3.0 VISUAL BASELINE

- 3.1 The visibility of the site is generally limited, and is summarised below:
- Views are limited towards the site by the existing housing woodland and frequent field boundary hedgerows. Visibility of the site is primarily confined to receptors in close proximity to the site boundaries along with some very limited views from higher ground to the south east.
 - The main views from residential properties include those along Heapey Road and Paradise Street. More restricted views are possible for some properties at the south of Great Knowley, and off Kittiwake Road and scattered properties located on higher ground to the south east.
 - Limited views from vehicles passing along Heapey Road adjacent to the site are possible.
 - Views are possible from a short section of Footpath PROW 9-2-FP21 that crosses through the site, and to a much more restricted degree, users of the public footpaths near the site and on the higher ground to the south east.

4.0 THE FUTURE BASELINE IF THE ALLOCATIONS IN THE CENTRAL LANCASHIRE LOCAL PLAN (2023-2041) ARE DEVELOPED.

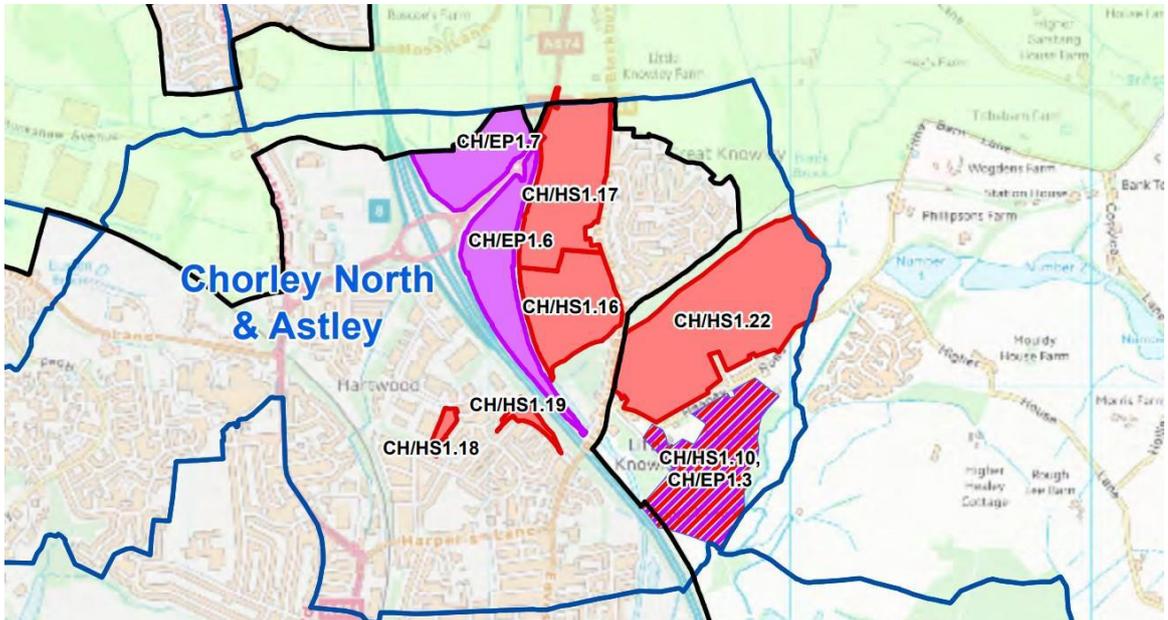
4.1 The Local Plan proposes a number of allocations in the vicinity of the site. These are shown on the extract of the Local Plan below. The red tone indicates a Housing Allocation and the orange tone a Mixed Use allocation.



4.2 Development as proposed above would provide a much more settled and suburban context than may currently be experienced by viewing the site in isolation as at present. In addition, development within the site, if kept to the western end of the site and in conjunction with the field parcel to the north, would provide a rounded off urban form when seen together with the allocation at Knowley to the south and the existing development at Great Knowley to the north.

5.0 THE PROPOSED ALLOCATION AND GREEN INFRASTRUCTURE

5.1 The site was previously part of a wider draft allocation in the Central Lancashire Regulation 18 Local Plan, an extract of which is shown below.



It is not entirely clear why the draft allocation has been reduced in extent from this version of the plan to the current version.

- 5.2 An indicative masterplan has been produced, to illustrate how development on the site could come forward. This is shown below, in conjunction with the other allocated and promoted land.



- 5.3 This shows residential development on the western part of the site, with proposed green space to the east. A landscape buffer would be provided to the north adjacent to the former rail line. Access would be from Heapey Road. Housing would back onto the existing properties to the south and west, but the existing properties have relatively long gardens ensuring protection of their residential amenity. A new green space would be established to the rear of the Grade 2 listed building on Heapey Road. The public footpath would be retained on its existing alignment and would continue to extend through greenspace. Housing is shown set back further to the west, than was the case in application 21/00253/OULMAJ. With the earlier application the set back was approximately 60m from the footpath. The Indicative Masterplan shown above includes a set back of approximately 125m, from the path, over double the distance that was previously suggested in the earlier application.
- 5.4 The development would be in line with existing built form along Heapey Road, and would in conjunction with the proposed allocations, provide a logical and appropriate settlement form, with little impact beyond the site itself. The allocation could be subject to a high-level masterplan showing the residential element restricted to the boundary line shown on the illustrative layout with the remainder of the site being used for open space / biodiversity enhancement and sustainable drainage. Appendix 4 of the CLLP already includes key development considerations for some of the proposed housing allocations which could include a high level masterplan for this potential allocation.
- 5.5 The following sections analyse the effects of the proposed allocation on the site.

6.0 INSPECTORS DECISION APPEAL REFERENCE APP/D2320/W/23/3314846

- 6.1 The site was subject to an earlier planning application, which was dismissed following an appeal. The scheme was for development covering a larger part of the site than is now being proposed.
- 6.2 At the time of the Inspectors decision, whilst the site was shown in the Central Lancashire Local Plan Preferred Options Part 1 (emerging LP) as forming part of a larger potential housing allocation site, the inspector concluded that at that time, the emerging Local Plan carried limited weight for the purposes of the appeal.
- 6.3 In this context, the inspector viewed the site in isolation, rather than as part of a wider strategic allocation. This led to the inspector considering the site was
“forming part of an attractive overtly rural environment.” (DL para 7),
- 6.4 The inspector went on to conclude that the scheme for 130 dwellings,
“would be greatly at odds with the prevailing more pastoral and natural surrounds of this part of the countryside. It would also not reflect the contained linear development patterns of adjoining development.” (DL para10)
- 6.5 These conclusions were for an individual application, which was separate from the larger areas of residential development nearby. This would not be the case if the proposed allocations were developed. The immediate area would be characterised by modern residential development to the west, and the built form would no longer just be *“linear development pattens.”* If the site were allocated along with the currently proposed allocations, it would be contained by residential development to the west, and south, and by woodland along the rail line to the north. The western edge would be more open, but with a suitable masterplan a large area of green infrastructure could be provided to establish a suitable transition to the wider countryside and a valuable environmental and amenity feature.
- 6.6 The Inspector was also concerned about the change to the view from public footpath PROW 9-2-FP21, with the appeal scheme. With that scheme the proposed housing would have been approximately 60m from the right of way. With developed as shown on the illustrative masterplan accompanying this representation, the housing would be typically over 125m from the path, an ample distance to provide a high-quality greenspace and filtering of views to resident development.
- 6.7 The conclusions of the Inspectors decision on APP/D2320/W/23/3314846, would no longer be appropriate, if development took place in the form shown on the illustrative masterplan, and in conjunction with the other proposed allocations.

7.0 LANDSCAPE EFFECTS

County/Borough Landscape Character

- 7.1 At this scale the site lies within Character Type 6 *“Industrial Foothills and Valleys”* and within area *“6b West Pennine Foothills”*. The introduction of a new residential development would result in permanent albeit localised changes in the landscape. The character of the landscape of the site will change from a pastoral one to residential with open space. The development would represent a modest extension of settlement in the context of Heapey Road, Great

Knowley and the Kittiwake Road housing and would be set within a robust network of Green Infrastructure.

- 7.2 Effects on the character of area LCT6b will be direct and adverse due to the physical changes proposed within this area. Given the limited and contained nature of these impacts and the degree of influence of settlement and infrastructure across the Character Area there would likely be a Minor adverse effect at completion. With the mitigation measures considered in the longer term, the effects will be Minor/Negligible.

Site and Immediate Context

- 7.3 The most noticeable landscape effects would occur within the site itself, where the fields would become housing and green space. Heapey Road to the south, Paradise Street to the west, and tree lines to the northern and eastern boundary provide the site with clear definition. The existing hedgerows along and within the boundaries of the site offer the basis for a strong GI structure to contain the site. Development of the site would be a continuation of the settlement pattern in the area, with areas of settlement set within wider parcels of pasture land and woodland. When seen in a wider landscape context, the development form is consistent with the existing pattern of development.
- 7.4 The properties on Heapey Road, Paradise Street, at Great Knowley and off Kittiwake Road already have an influence upon the neighbouring local landscape and the preservation of existing vegetation at the boundaries will retain the character of surrounding field parcels.
- 7.5 The immediate context of the site includes the land to the west, which is currently subject to a proposed allocation, and land to the southeast towards the Kittiwake Road Knowley development. Therefore overall, there would in LVA terms be a Moderate adverse effect upon completion, and the long term landscape effects on the site and its immediate context would be Moderate to Minor adverse as the proposed planting matures.
- 7.6 The effect on landscape character would be limited to the site and its immediate surroundings and would be no greater than would be expected for development of a green field site.

8.0 VISUAL EFFECTS

Public Rights of Way (PROW) and Other Footpaths

- 8.1 The development would be visible to varying extents from the PROW in the local area. For users of the majority of PROW in the wider area, the visual effects would be minor adverse or negligible in the longer term. These routes include,
- From footpath 9-15-FP 1, which extends south from the site, views of the site are largely obscured by trees adjacent to the footpath and the intervening higher ground. The proposed mixed use allocation south of Heapey Road would be visible.
 - From footpath 9-2-FP 36, which lies to the west of the site, views of the site are obscured by the intervening higher ground and users will not be able to view the site from this location. This footpath lies within the areas proposed for allocation for residential development.
 - From footpath 9-15-FP 30, which lies east of the site, views of the site are partially obscured by an existing tree line and existing woodland. Short, glimpsed views into the site will be possible, particularly at the southern end of the footpath.
 - From footpaths to the north of the site, views of the site are severely obscured by existing woodland
- 8.2 From footpath 9-2-FP 6, and other paths on the higher land to the south, there are some wide ranging views south across the valley. Some views of the site on the higher ground beyond, set in the varied context of development and farmland would be possible, for short sections of these routes. By Year 15 the effects are predicted to be Minor adverse.
- 8.3 From footpath 9-2-FP 21 that crosses through the site, views will change from a pastoral to one with more development visible beyond a buffer area typically 125m wide. Some of the rural nature of the footpath will be retained through the proposed greenspace and balancing pond to the east. The main view from the footpath, is in the direction of travel, and whilst the development will be apparent obliquely.
- 8.4 The main view south along the route is to the distant hills, and travelling north is towards the planting along the old rail line. These views will still be possible. In the current view the walkers on the path are aware of housing along Heapey Road, and with glimpses of houses at Kittiwake Road. The edge of the new houses on the appeal site will be visible on the higher ground to the west but set well back from the footpath. This area of green infrastructure will include new tree planting, softening views to the new housing over time. On completion overall effects will be moderate adverse and will reduce over time with the new planting. The green space and landscape treatment would ensure a soft transition between the developed area and the wider countryside, and there would not be a stark transition. The length of footpath affected is approximately 350m, which is a relatively short length when seen in the context of the extensive network of paths in the surrounding area.

Residential Properties and Settlement

- 8.5 On completion, the properties along Heapey Lane and Paradise Street that back onto or front the site will see their enclosed pastoral view change to one of development at closer distance. The relatively long gardens mean that the new development will be set back from the properties.

- 8.6 The residential properties at Great Knowley and off Kittiwake Road are set well back from the site boundary and are screened by intervening woodland. On completion overall effects have been assessed minor adverse and minor/negligible at year 15.
- 8.7 Scattered properties to the south east will experience a full but long-distance view of the site. On completion overall effects have been assessed as minor adverse and negligible at year 15.

Roads & Transport Users

- 8.8 There will be views to the scheme from Heapey Road, where it is close to the site. This is over a relatively short distance, typically less than 300m, and visibility will be focused on the road. Short, glimpsed and side on views into the site will be possible, while travelling along Heapey Road and adjacent to the proposed site access. Heapey Road is already lined by properties to the west of the proposed access, so whilst the residential development would be seen, it would not be introducing a use that is not already in the local environment. On completion overall effects have been assessed to be moderate/minor adverse and minor adverse at year 15 as the planting matures.

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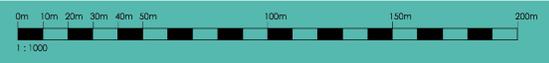
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APPENDIX 2



- KEY
- Site Boundary
 - Proposed Residential Development
 - Proposed Site Access
 - Potential Emergency Vehicle Access and Pedestrian / Cycleway Link
 - Primary Route
 - Secondary Route
 - Tertiary Routes / Private Drives
 - Focal Square
 - Public Open Space
 - Public Right of Way (PROW)
 - Potential Redirected PROW
 - Proposed Pedestrian Footpath
 - Existing Woodland
 - Retained Existing Vegetation
 - Indicative Planting
 - Existing Pond
 - Potential Attenuation Ponds
 - Formal Play Area (LEAP)
 - Utilities Easement
 - Potential Pumping Station
 - Potential Future Development Wider Ownership
 - Potential Pedestrian Links
 - Potential Links





APPENDIX 3

Central Lancashire Local Plan Preferred Options Consultation

Settlement Hierarchy and Proposed Housing Allocations at Eccleston, Chorley

1. De Pol Associates are instructed by Northern Trust Ltd to submit representations on their behalf to the Central Lancashire Local Plan Part 1 Preferred Options (PO) consultation. This representation relates specifically to the proposed housing allocations at Eccleston, Chorley and the location the settlement within the settlement hierarchy.
2. Strategic objective 2 of the PO is to focus development at accessible and sustainable locations, making the best use of existing land, infrastructure, facilities, and services wherever possible. Strategic objective 4 is to create healthy, vibrant, safe, and sustainable communities with a diverse range of housing to meet future needs. Providing a scale and mix of housing types and sizes and a variety of tenures alongside a range of family and affordable homes in a range of locations to deliver economic aspirations and local housing needs.
3. In this context, when deciding where to direct housing growth the PO states that spatial priority 1 is to ensure that growth is distributed to the area's most sustainable locations, avoiding a disproportionate level of growth in less sustainable settlements. The most sustainable settlements are identified in policy direction 6, where Eccleston is identified as a tier 4 local and rural centre where moderate growth and investment is to be directed to meet housing and employment needs. This is reflective of the fact that Eccleston is clearly a settlement suitable for delivering part of the District's housing requirement. It has a centre with both food and non-food retail including a Sainsbury's supermarket and community market, cafes, restaurants, Post Office, primary schools, dentist, opticians, pharmacy, library, public house and recreational ground and a youth centre. It also has good public transport links with regular bus services with Chorley, Leyland and Preston. Indeed it is considered that Eccleston should be classed as a tier 3 district centres. In any event, the settlement is identified as one of the more sustainable settlements where moderate growth is to be directed.



4. It is acknowledged that the PO proposes the following four housing allocations at Ecclestone totalling 168 dwellings.
 - CH/HS1.35 East of Tincklers Lane (22 dwellings)
 - CH/HS1.36 Land South of Parr Lane (34 dwellings)
 - CH/HS1.37 Land South West of The Green and Langton Brow (32 dwellings)
 - CH/HS1.38 Land at Tincklers Lane (80 dwellings)

5. However, the above allocations will extinguish the remaining available safeguarded land at the settlement and the Green Belt boundaries are so tightly drawn around the remaining urban area that further development opportunities will be significantly limited without a review of Green Belt boundaries. In this context this level of growth is limited, particularly given that the PO suggests on page 36 that the Central Lancashire authorities are exploring potential options for accommodating growth in the next Local Plan period. Indeed the proposed allocations at Ecclestone total just 34 dwellings more than the allocations proposed at Mawdesley, which is a tier 5 smaller rural village where 'smaller levels of growth and investment will be directed' if insufficient land is available in Tiers 1-4.

6. It is acknowledged that NPPF paragraphs 140 and 141 state that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified; and where the strategic policy-making authority can demonstrate that it has examined fully all other 'reasonable options' for meeting its identified need for development. It is also acknowledged that the PO does not presently seek to release Green Belt land in Chorley to meet development needs other than for previously developed land. However, NPPF paragraph 140 also confirms that strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period. NPPF paragraph 79 also promotes housing where it will enhance or maintain the vitality of rural communities and requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services. In this context it is considered more appropriate to review Green Belt boundaries around Ecclestone to ensure adequate opportunities for growth within this settlement over the plan period and beyond rather than directing Chorley's housing need elsewhere within Central Lancashire.



7. This is especially the case as there are opportunities to release land from the Green Belt in locations where there would be no/limited impact on the purposes of the Green Belt. This includes three sites promoted by Northern Trust in previous/current call for sites consultation exercises. It is not considered necessary to resubmit previously submitted evidence in this regard, although as highlighted below the release of these sites would not harm the purposes of the Green Belt but would help ensure adequate growth opportunities at this key settlement.
8. Before addressing each site it is relevant to note that all three sites fall within Green Belt parcel 38 of the Central Lancashire Open Land Designations Study (OLDS). This confirms that this wider parcel of Green Belt has limited/no contribution to three of the purposes of including land in the Green Belt, i.e. checking the unrestricted sprawl of large built-up areas (purpose 1), preventing neighbouring towns from merging into one another (purpose 2) and preserving the setting and special character of historic towns (purpose 4). There is also no evidence that the release of any of the Green Belt sites would undermine urban regeneration (purpose 5). The only Green Belt purpose which parcel P38 is identified as contributing towards in the OLDS is purpose 3, i.e. assisting in safeguarding the countryside from encroachment. However, this is on the grounds that *“Land within the majority of the parcel lies at some distance from any inset settlement and from any urbanising influences”* and as highlighted below this clearly doesn't apply to three subject sites.

Land off Shelly Drive

9. As highlighted in the aerial photograph below this site has the existing urban edge defining its western and southern site boundaries, whilst there are fisheries and kennels to the east. The site is therefore clearly not some distance from any inset settlement and far from any urbanising influences. It is instead surrounded by urban influences and shares two boundaries with the main urban area. Furthermore, the existing settlement edge/Green Belt boundary is weak in this location with just rear garden boundary treatments and sparse tree cover separating the urban area from the subject site/countryside. Indeed Shelly Drive leads right up to the site boundary. In contrast the subject land is visually and physically separated from the remaining open countryside to the north by existing established tree cover. As such the release of the site for development would replace a weak boundary with a stronger Green Belt boundary and one which better reflects the existing edge of Ecclestone. The subject site does not contribute to Green Belt purpose 3 and as already highlighted the OLDS confirms there is no/limited contribution to the other purposes of including land in the Green Belt.



Land off Shelly Drive, Eccleston (extract from Google Maps)

10. The subject site is also well connected to the shops, services and public transport connections in Eccleston. It is within flood zone 1, has no known insurmountable constraints to development, has an existing access and is immediately available for development. At 0.9ha in size it would also deliver circa 24 additional houses based on the PO densities and thus would be appropriate in scale for Eccleston even taken account of other commitments.

Land South of Parr Lane and West of Bradley Lane

11. As highlighted below this site already has urbanising features / the settlement edge along its western, northern and southern boundaries comprising an approved housing development, the Eccleston recreational grounds and existing employment, housing and the Cunneries Fishery with fishing lakes and car parks on the opposite side of Parr Lane.



Land south of Parr Lane and west of Bradley Lane, Ecclestone (extract from Google Maps)

12. As such the justification for the OLDS concluding that Green Belt parcel P38 significantly contributes to purpose 3, on the grounds that “*Land within the majority of the parcel lies at some distance from any inset settlement and from any urbanising influences*” clearly does not apply to this site. Indeed the OLDS itself confirms that this eastern boundary of Ecclestone has a weaker distinction from the inset edge due to a lack of boundary features. Bradley Lane would however provide a physical and visual hard boundary should the subject land be released for development. As such the subject site does not contribute to Green Belt purpose 3 and as highlighted the OLDS already confirms there is no/limited contribution to the other purposes of including land in the Green Belt.

13. The subject site is also well connected to the shops, services and public transport connections in Ecclestone. It is within flood zone 1, has no known insurmountable constraints to

development and is immediately available for development. At 3.2ha in size it would also deliver circa 86 additional houses based on the PO densities which would be inappropriate in scale for Ecclestone even taken account of other commitments.

Land South of Bradley Lane

14. As highlighted below this site already has urbanising features and built development on three sides, including existing housing and the Ecclestone recreational grounds. As such the justification for the OLDS concluding that Green Belt parcel P38 significantly contributes to purpose 3, on the grounds that *“Land within the majority of the parcel lies at some distance from any inset settlement and from any urbanising influences”* clearly does not apply to this site. Indeed the OLDS itself confirms that this eastern boundary of Ecclestone has a weaker distinction from the inset edge due to a lack of boundary features. As such the subject site does not contribute to Green Belt purpose 3 and as highlighted the OLDS already confirms there is no/limited contribution to the other purposes of including land in the Green Belt.



Land south of Bradley Lane, Ecclestone (extract from Google Maps)

15. The subject site is also well connected to the shops, services and public transport connections in Ecclestone. It is within flood zone 1, has no known insurmountable constraints to development and is immediately available for development.



Conclusion

16. The release of these sites would cause no/limited harm to the Green Belt purposes but would help deliver housing in a sustainable manner, in line with the spatial strategy and the NPPF objective of ensuring adequate opportunities for villages to grow and thrive, especially where this will support local services. This is particularly the case as without a review of the Green Belt boundaries there are limited opportunities for growth beyond the proposed allocations, which are not sufficient for a sustainable settlement of this nature. There are therefore exceptional circumstances to justify changes to the Green Belt boundary in these locations.

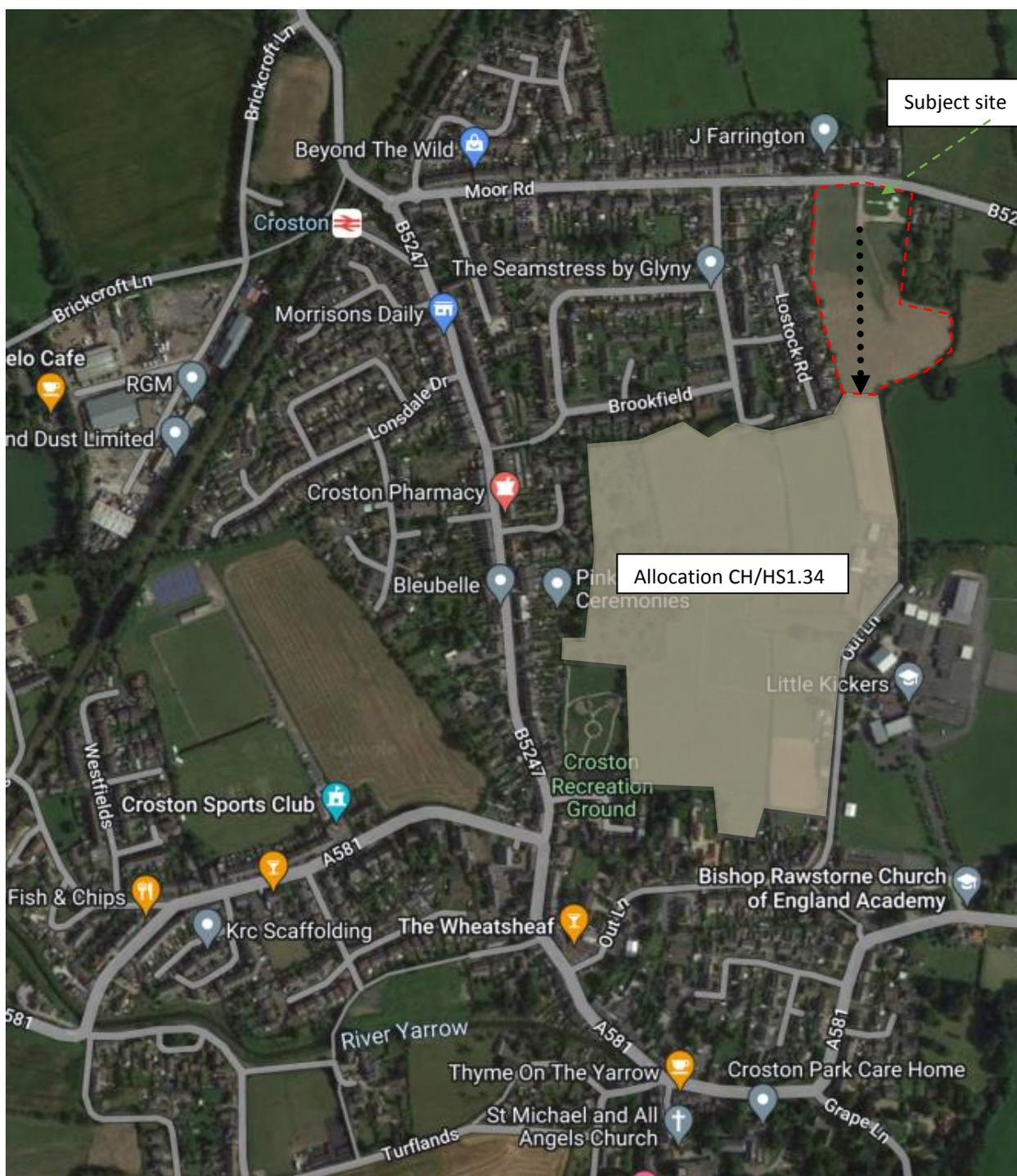


APPENDIX 4

Central Lancashire Local Plan Preferred Options Consultation

Proposed Housing Allocation CH/HS1.34 ‘Out Lane, Croston’

1. De Pol Associates are instructed by Northern Trust Ltd to submit representations on their behalf to the Central Lancashire Local Plan Part 1 Preferred Options (PO) consultation. This representation relates specifically to proposed housing allocation CH/HS1.34.
2. Northern Trust does not object to the principle of the proposed allocation but is concerned as to whether the allocation can be delivered in its current form. As highlighted below there are access constraints affecting this site which could be suitably addressed by extending the allocation to include the allocation of adjacent land to the south of Moor Road.
3. The current allocation extends to 6.90 ha and has an identified potential yield of 186 houses. It is the only opportunity for growth identified in Croston due to the tightly defined Green Belt boundaries around the settlement. The Council’s Site Profile 25, which relates specifically to this proposed allocation, confirms access as being a potential constraint for the site. In this respect there is at present no obvious appropriate solution to securing suitable vehicular access for a development of this size based on the current allocation site boundaries and the nature of Out Lane. It is also understood that the Diocese of Blackburn who own the site led a community consultation exercise in 2021 which highlighted concerns of road congestion within Croston arising from through traffic, which would be exacerbated if vehicular access to the site were to be through the village centre.
4. As highlighted below a solution to this constraint would be to extend the existing allocation to include land to the north east of the allocation, which would link the wider allocated site directly to Moor Road to the north. Indeed this land already contains storm water attenuation infrastructure and a new access road off Moor Road and it is understood that the Diocese of Blackburn have also identified this as an appropriate solution to delivering access to their land.



5. In addition to helping secure the deliverability of this allocated site, which is the only identified allocation in Croston, the proposal would also help contribute towards delivering the current shortfall identified within Chorley in the PO, as highlighted in other representations on behalf of Northern Trust.



6. An increase in the existing allocation to include this subject land would also remain an appropriate scale of development for Croston in line with the spatial strategy. In this regard strategic objective 2 of the PO is to focus development at accessible and sustainable locations, making the best use of existing land, infrastructure, facilities, and services wherever possible. Strategic objective 4 is to create healthy, vibrant, safe, and sustainable communities with a diverse range of housing to meet future needs. Providing a scale and mix of housing types and sizes and a variety of tenures alongside a range of family and affordable homes in a range of locations to deliver economic aspirations and local housing needs.
7. In this context, when deciding where to direct housing growth the PO states that spatial priority 1 is to ensure that growth is distributed to the area's most sustainable locations, avoiding a disproportionate level of growth in less sustainable settlements. The most sustainable settlements are identified in policy direction 6, where Croston is identified as a tier 4 local and rural centre where moderate growth and investment is to be directed to meet housing and employment needs. This is reflective of the fact that Croston is clearly a settlement suitable for delivering part of the District's housing requirement. It benefits from a with a shops and a range of services including doctors surgery, post office, secondary and primary schools and recreational facilities. It has sustainable transport options with a bus route through the site providing regular services to Chorley, Preston and Rufford, as well as a railway station providing regular services to Preston and Ormskirk.
8. Not only does housing provision at Croston comply with the PO spatial strategy of directing growth to the more sustainable settlements but it is imperative that the Local Plan ensures that settlements such as Croston have opportunities to grow over the plan period and beyond. NPPF paragraph 79 confirms that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services.
9. It is acknowledged that allocation CH/HS1.34 could, based on assumed PO densities, deliver 186 dwellings and that the subject land, which extends to 1.75ha, could result in a further 47 dwellings on this basis. However this scale of growth still falls within the acceptable spatial strategy parameters for tier 4 settlements where moderate growth is to be directed to the settlements. In this respect the PO proposes housing allocations at Mawdesley totalling 134



dwellings which is a tier 5 smaller rural village where 'smaller levels of growth and investment will be directed' if insufficient land is available in Tiers 1-4.

10. Moreover, given that allocation CH/HS1.34 is the only identified allocation at Croston and has accessibility constraints which could undermine its deliverability, additional allocations would be prudent to ensure that the District's housing need is met and that there is a realistic opportunity for growth at this key settlement in line with NPPF paragraph 79.
11. With regards to the subject land itself this has already been put forward in previous call for sites consultation exercises. In summary the site is located within flood zone 1 and potential flood risk does not represent an insurmountable hurdle to the site's development. There is an existing suitable access off Moore Road and the site is accessible to the aforementioned shops, services and public transport opportunities within Croston. It is also well related to the existing urban area with housing adjacent to three of the site boundaries and proposed housing allocation CH/HS1.34 abutting the southern boundary. The site is in single ownership and being brought forward by a company with a track record of delivering housing within Chorley and Lancashire. It is immediately available and there is no reason at this stage to assume that there are any insurmountable technical constraints to the development coming forward.
12. It is acknowledged that the site is within the Green Belt and under the terms of NPPF paragraph 140 Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. The NPPF states that strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. For the following reasons it is considered that there are clear exceptional circumstances which support the release of this land for development.
13. Firstly, and as highlighted, the release of this land from the Green Belt will address an access constraint likely to affect the delivery of the only allocated site within Croston and there are limited alternative opportunities for development at Croston which would not require the release of Green Belt land. As one of the more sustainable settlements within Chorley it is imperative that there are deliverable opportunities for growth over the plan period in line with aforementioned NPPF and policy objectives.



14. Secondly, and as expanded upon below the current boundary between the urban area and Green Belt in the location of the subject site is weak and the release of the land for development would have no/limited impact on the purposes of including land within the Green Belt. Instead it would result in a stronger more defensible boundary between the urban area and Green Belt.
15. In this regard the subject site, along with all of land east of Croston, falls within Green Belt parcel P42 in the Central Lancashire Open Land Designations Study (OLDS). This confirms that this wider parcel of Green Belt has limited/no contribution to three of the purposes of including land in the Green Belt, i.e. checking the unrestricted sprawl of large built-up areas (purpose 1), preventing neighbouring towns from merging into one another (purpose 2) and preserving the setting and special character of historic towns (purpose 3). There is also no evidence that the release of any of the Green Belt sites would undermine urban regeneration (purpose 5). The only Green Belt purpose which parcel P42 is identified as contributing towards in the OLDS is purpose 3, i.e. assisting in safeguarding the countryside from encroachment. This is on the basis of P42 containing land that has a strong distinction from any urban development and where development would be considered significant encroachment on the countryside.
16. It will be noted however that P42 covers a large area of land with the OLDS stating that *“the majority of the parcel lies at some distance from the inset areas, away from urbanising influences”*. This may apply to large areas of P42 but clearly doesn't apply to the subject site. Indeed the OLDS itself states that there is some land within P42 adjacent to Croston which has weaker distinction from the inset area with only garden boundaries.
17. As highlighted in the aerial photograph below the subject land is not detached from the inset area nor is it away from urbanising influences. It is instead located immediately adjacent to the main built up area of Croston on two sides and there are existing and proposed urbanising features on all four site boundaries as well as within the site itself. In this respect there is existing residential development to the west, north and north east of the site, whilst proposed housing allocation CH/HS1.34 abuts the site to the south. The site itself also already has an existing road access off Moor Road and existing storm water attenuation infrastructure which constitutes an urbanisation effect within the site itself. Furthermore, along the road frontage the site is sandwiched between existing housing development to the west, east and north and existing development and boundary trees/landscaping visually and physically separates the site from the remaining Green Belt. There is also currently a weak distinction between the existing

eastern edge of the settlement and the Green Belt in this location, which is defined by rear gardens with sparse tree cover. By contrast the release of the subject site for housing would result in an alternative stronger boundary edge defined by existing trees. Consequently the release of this site for housing would have no/limited impact on the purpose of safeguarding the countryside from encroachment and as already highlighted the OLDS confirms there is no/limited impact on any of the other purposes of including land within the Green Belt.



18. In addition to potentially being fundamental in ensuring the deliverability of the only allocated site in this key settlement the release of the land for housing would also assist in meeting wider development needs in a sustainable location.
19. The above factors represent the exceptional circumstances required to justify changes to the Green Belt boundary in this location.

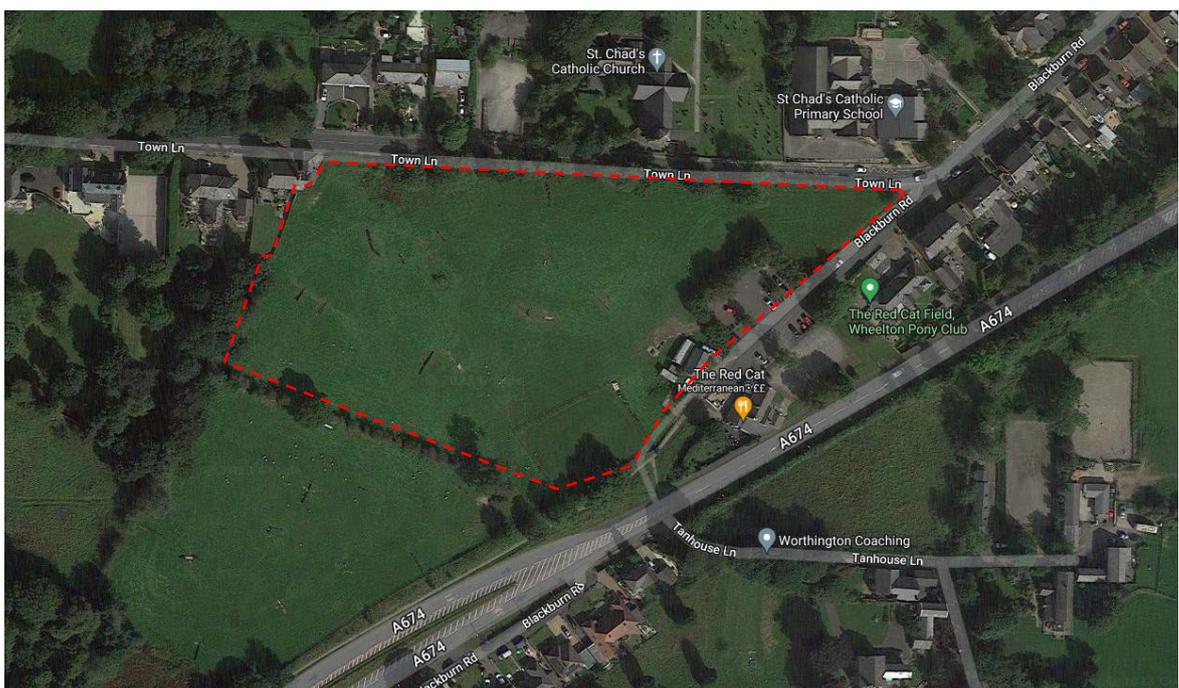


APPENDIX 5

Central Lancashire Local Plan Call for Sites Consultation 2023

Proposed Housing Allocation : Land at corner of Town Lane and Blackburn Road, Wheelton, Chorley

1. De Pol Associates are instructed by the Trust Inns to submit land at the corner of Town Lane and Blackburn Road, Wheelton to the 'Call for Sites' consultation as a potential housing site. This Statement should be read in combination with the plans and forms submitted in response to the Consultation.
2. The site extends to approximately 2ha and is located to the west of the junction between Town Lane and Blackburn Road, which define the northern and eastern site boundaries respectively. The site is surrounded on three sides by existing development comprising housing, a church, primary school and public house. An area of woodland is located to the south west corner of the site, whilst the southern boundary is defined established trees and hedgerow. A site location plan has been submitted as part of these representations but the site is also shown on the aerial photograph below.





3. The majority of the site is used for grazing / equestrian use. Part of the site already comprises a car park and other small buildings which are included in the red edge but need not necessarily form part of any housing allocation.
4. The site is currently located within the designated Green Belt. Paragraph 136 of NPPF allows for alterations of the Green Belt boundaries in exceptional circumstances as part of the preparation or updating of a Local Plan. If it is considered that there is a need to release Green Belt land to provide for the housing needs of the borough then exceptional circumstances will have been demonstrated and it is considered that the subject site would be a suitable site for release.
5. Paragraph 134 of NPPF states that the Green Belt should serve five purposes to achieve their fundamental aim of stopping urban sprawl through the maintenance of permanently open spaces. It is considered that the site has limited/no contribution to the five purposes of Green Belt as defined by NPPF.
6. The site forms part of Green Belt Parcel P2 in the Green Belt Assessment which is part of the Opel Land Designations Study (OLDS), which includes all of the Green Belt east of Whittle-le-Woods, which assesses the contribution of the parcel to these five purposes of the Green Belt.
7. With regards to checking the unrestricted sprawl of large built-up areas (purpose 1) the xxx states that parcel P2 has a significant contribution on the grounds that it lies directly to the east of Whittle-le-Woods, which forms part of the Central Lancashire large built-up area. However, and accepted by the OLDS, the M61 to the west of Whittle-le-Woods is a strong boundary feature that creates strong distinction between that settlement and the Green Belt. Furthermore, the subject site is not on the edge of Whittle-le-Woods but on the edge of Wheelton, which is not part of the Central Lancashire large built-up area but is a village identified in the Local Plan Part 1 Preferred Options (PO) as a tier 5 smaller rural village where smaller levels of growth and investment will be directed. As such whilst parts of Green Belt parcel P2 may contribute to purpose 1 this is not the case for the subject site, which has limited/no contribution.
8. With regards to preventing neighbouring towns from merging into one another (purpose 2) the OLDS states that parcel P2 has a moderate contribution as the parcel lies in a wide gap between



Whittle-le-Woods and Blackburn and Darwen to the east, with wooded slopes between the two acting as significant separating features. However the subject site is on the edge of a village which is surrounded on three sides by existing development. The development of the site would not result in the urban area of Wheelton being any closer to adjacent settlements. As such whilst parts of Green Belt parcel P2 may contribute to purpose 2 this is not the case for the subject site, which has limited/no contribution.

9. With regards to preventing assisting in safeguarding the countryside from encroachment (purpose 3) the OLDS states that parcel P2 has a significant contribution as the parcel generally has rural uses and contains land that has strong distinction from Whittle-le-Woods and the inset settlements of Brindle and Wheelton. It stated that development in most of the parcel would be a significant encroachment on the countryside. This is not the case for the subject site. Whilst the existing development along Town Lane to the north of the site is outside the defined settlement boundary of Wheelton, on the ground this development forms part of the village. Indeed the development to the north includes the school and church. The site therefore is surrounded on three sides by development which forms part of the urban area of Wheelton. The site also already contains urbanising features such as buildings and car parking. It also has existing established trees and hedgerows which would form a strong visual and physical boundary to the south. As such the site does not have more than a limited contribution to purpose 3 of the green belt.
10. With regards to preserving the setting and special character of historic towns (purpose 4) the OLDS accepts that parcel P2 has limited/no contribution.
11. With regards to assisting urban regeneration (purpose 5) the OLDS states that parcel P2 has equal contribution on the grounds that all Green Belt land is considered to make an equal contribution to this purpose. However, there is no substantive evidence to suggest that the development of this site would disincentivise any urban regeneration elsewhere in the Borough especially given the fact that the vast majority of the land already identified for housing allocations is greenfield. The development of this land would be unlikely to adversely impact on the regeneration of any urban redevelopment sites in the Borough and there would be no conflict with this purpose.
12. For the reasons identified above the site could be released from the Green Belt without conflict with the purposes of Green Belt set out in the NPPF.



13. As to other relevant factors the site is within Flood Zone 1, has clear access to the existing highway and there are no known constraints to the development of the site. The subject site does not incorporate any trees other than along site boundaries and there is the potential to provide additional tree planting on site as part of any scheme. In ecology terms no surveys have been undertaken at present but it is considered that it is unlikely there would be any ecological impediments to the delivery of the site.
14. It is well located to the facilities of Wheelton which is a tier 5 village in the PO where some growth and investment is to be directed.
15. The site is wholly controlled by Trust Inns which is sister company to Northern Trust Company Ltd who are a promotional company with a track record of delivering housing schemes across Chorley and Lancashire. It is immediately available for development based on the experience of Northern Trust the site would be of interest to potential developers.
16. It is considered that the subject site would be suitable for residential development, corresponding with development immediately adjacent and whilst it is located in the Green Belt there are no other known constraints to the development of the site. Whilst the site is currently designated as Green Belt it is considered that the site would be suitable for removal on review.



APPENDIX 6

Central Lancashire Local Plan Call for Sites Consultation 2023

Proposed Housing Allocations, Euxton Chorley

1. De Pol Associates have previously submitted representations on behalf of Metacre Ltd to earlier call for sites consultations promoting land for housing development to the west of Euxton, Chorley. The land was referred to as land east of M6 and north of Dawbers Lane and was promoted as a potential site in its entirety or as separate parcels of land as shown below.



2. This additional representation seeks to add relevant and important information relating to the above sites in support of their consideration for allocation in the Local Plan Preferred Options should Green Belt release be considered appropriate.



Site A – land west of Gleadhill House Gardens and north of Dawbers Lane

3. There is a clear desire by central Government to significantly boost the supply of self-build and custom housebuilding. NPPF paragraph 62 and footnote 28 confirm that ensuring that enough suitable development permissions are granted to meet the needs of people wishing to commission or build their own homes is one of the types of housing need which NPPF paragraph 61 seeks to address. Granting sufficient development permissions to meet this demand is also a duty placed on local planning authorities by the Housing and Planning Act 2016 and the Custom Housebuilding Act 2015.

4. The need for the replacement Local Plan to contain policies to promote this particular housing need is also clearly acknowledged by the Central Lancashire authorities. The Central Lancashire Housing Study (2020) highlights in paragraph 9.24 that *“the Government has long had a clear agenda for supporting and promoting the self-build and custom building sector”*. It also recommends at paragraph 10.34 that *“in recognition of the level of demand in the study area, a specific planning policy should be developed to help promote and encourage delivery of self-build and custom housebuilding”* and that the Council should take a *“flexible approach to supporting the self-build and custom housebuilding sector on both small sites, and larger strategic sites”*. The Central Lancashire Local Plan Consultations Outcome Report September 2020 in relation to the Issues and Options Paper also identifies a key theme arising from the consultation responses being the need for more opportunities to be identified for self-build.

5. The need for self-build housing in Chorley was also considered in the August 2020 Pear Tree Lane appeal decision in Euxton¹. At paragraph 62 of this appeal decision the Inspector accepted that *“The evidence clearly indicates that the 5 year supply of self-build plots in the Borough is likely to fall well short of the anticipated demand. As such the provision of a further 18 self-build and custom housebuilding plots on the appeal site would make an important contribution to the need for this type of housing in Chorley”*. At paragraph 60 the Inspector concluded that *“The provision of 18 of the units as self-build or custom house building plots should also attract significant weight in favour of the proposal, given the level of demand for self-build as a sector of housing need”*. As this appeal relates to a site in Chorley it is not considered necessary to attach the appeal decision.

¹ Appeal APP/D2320/W/20/3247136, Chorley Council ref: 19/00654/OUTMAJ

6. However the PO does not appear at present to make any specific provision for this particular housing need.
7. It is relevant to note that Metacre Ltd submitted an outline planning application in August 2022 for the development of 1.68 hectares on land to the west of Gledhill Gardens north of Dawber's Lane for 11 self-build / custom-build houses. This is hereafter referred to as the subject site and is shown on the aerial photograph below. It forms part of one of the sites previously presented in the earlier call for sites consultation.



8. This planning application was supported by a detailed Self-Build and Custom Housebuilding Statement which demonstrates that there remains a need for land to accommodate the self-build and custom build housing needs of Chorley. This was not disputed by the Council in the consideration of this application.
9. The application has also confirmed that there are no insurmountable technical constraints to the development of the subject site including in relation to highway impact, biodiversity, trees, flood risk and drainage.
10. The site can be accessed from the adjacent Gledhill House Gardens development and subject to conditions there were no objections from the Local Highway Authority to the development of this site in terms of access or impact on highway capacity and safety.



11. The submitted ecology assessment confirms that that subject site is of very little value in ecological terms, being dominated by species-poor improved grassland which is currently grazed by horses. No evidence was found of any specifically protected or otherwise important species occurring within the development footprint and no important habitats were identified that would be adversely affected. This includes locally, nationally and regionally important designated sites. With the implementation of a few relatively minor precautions and the retention and management / enhancement of vegetation the development of the site will result in negligible ecological impact and an overall net gain for biodiversity. Subject to conditions there were no objections from the Greater Manchester Ecology Unit to the development.
12. The submitted tree survey and arboricultural report demonstrated that the site could be developed without loss of trees whilst there would be scope for substantial additional new tree planting. There were no objections from statutory bodies.
13. The submitted Flood Risk Assessment report confirms that the site is located within flood risk zone 1 and has a low risk of flooding from all assessed sources. Furthermore, as all on-site roofs and paving areas would drain into a designed surface water system there will be no increase in off-site flood flows generated by the development. It was demonstrated at the application stage that a suitable drainage solution could be delivered and there were no objections to the development of the site in principle from statutory bodies.
14. The illustrative site layout submitted with the application demonstrated that is no reason why a suitable and high quality development could not be secured.
15. The site is also of a size which would contribute towards the NPPF paragraph 69 objective of ensuring sufficient small and medium sized sites are available as part of the housing supply.
16. Whilst outside the defined settlement boundary the site is also well connected to Euxton, being approximately 280 metres from the settlement edge and accessible by footpaths along Dawbers Lane. There are also bus stops on Dawbers Lane, Wigan Road and Balshaw Lane, whilst the Balshaw Lane railway station is 750 metres away with regular trains to Leyland, Preston and Wigan. The designated local centre of Euxton is less than 1km from the proposed site access, whilst there are other facilities close by such as the Geoff Witts Millennium Green and the Euxton Mills public house. There are also three primary schools within the settlement,



whilst Chorley Town Centre is just 3km away. The site is therefore an accessible location for residential development.

17. Whilst the application was refused by the Council the only stated reason was due to its location within the Green Belt. Without prejudice to whether there are very special circumstances to support the development of this site now under current NPPF policy, it is considered that should the Local Plan PO consider a need to release Green Belt land this is an obvious location for the above reasons and the fact that the site could be developed with no/limited contribution to the purposes of including land within the Green Belt as identified in NPPF paragraph 138.
18. When considering the impact on the Green Belt it is noted that the subject site is located within parcel P15 of the Council's Green Belt Assessment contained within the Open Land Designations Study (OLDS). The OLDS already confirms that this parcel has limited/no contribution to two of the purposes of the Green Belt, namely preventing neighbouring towns from merging into one another (purpose 2) and preserving the setting and special character of historic towns (purpose 4). The OLDS makes no comment on purpose 5 which is assisting in urban regeneration, other than to state that all Green Belt is considered to make an equal contribution to this purpose. However there is no substantive evidence to suggest that the development of this site would disincentivise any urban regeneration elsewhere in the Borough especially given the fact that the vast majority of the land already identified for housing allocations is greenfield. The development of this land would be unlikely to adversely impact on the regeneration of any urban redevelopment sites in the Borough and there would be no conflict with this purpose.
19. It is noted that the OLDS suggests that parcel P15 has a significant contribution to checking the unrestricted sprawl of large built-up areas (purpose 1) on the grounds that this wider parcel of land lies directly adjacent to Euxton which forms part of the Central Lancashire large built up area where tree cover creates a strong boundary distinction between the parcel and the urban area to the extent that development crossing into the parcel would constitute significant sprawl. The OLDS also states that parcel 15 has a significant contribution to assisting safeguarding the countryside from encroachment (purpose 3) on the grounds that the parcel is characterised by rural uses and contains land that has a strong distinction from Euxton due to the presence of dense tree cover. It should be noted however that parcel 15 covers a large area and the above comments with regards to purposes 1 and 3 do not apply to the subject land.

20. With regards to purpose 1 the OLDS states that parcel 15 has a significant contribution to checking the unrestricted sprawl of large built-up areas on the grounds that existing tree cover creates a strong boundary distinction between the Green Belt parcel and the urban area to the extent that development crossing this into the Green Belt parcel would constitute significant sprawl. However, development has already crossed the settlement boundary along this stretch of Dawbers Lane, which is already strongly influenced by built development.
21. As demonstrated by the photographs below, when travelling along Dawbers Lane into Euxton you pass various built development and urban features before reaching the subject site and the existing defined settlement boundary. Indeed when viewed on the ground the start of the settlement of Euxton is further west along Dawbers Lane than what it technically shown on the Local Plan policies map.



photograph looking east along Dawbers Lane when approaching Euxton, taken just prior to Old Dawbers Lane to the west of the subject land



photograph looking east along Dawbers Lane when approaching Euxton, taken just to the west of the subject site

22. Indeed the CGI image below shows how the subject site, if developed, would simply be plugging a gap between an existing built up area to the west of Euxton which on the ground already has the appearance of being part of Euxton.



CGI image of the existing Gleadhill House Gardens development, an illustration of the development of the subject land (hatched red) and other adjacent existing development.

23. In this context, the subject land offers little contribution to the purpose of checking the unrestricted sprawl of large built-up areas as development has already extended beyond Euxton in this location and the site is essentially an infill plot between existing built development. Furthermore and as demonstrated in the CGI image above the site is well constrained by existing woodland.
24. With regards to Green Belt purpose 3 the OLDS suggests that parcel P15 has a significant contribution to assisting safeguarding the countryside from encroachment on the grounds that the parcel is characterised by rural uses and contains land that has a strong distinction from Euxton due to the presence of dense tree cover. As already highlighted on the ground, the extent of existing development and urban influences in this area means this stretch of Dawbers Lane has more affinity with the settlement of Euxton than open countryside. The site itself is also immediately adjacent to existing housing and is both visually and physically detached from any open countryside by extensive woodland planting. This woodland also screens the site from public vantage points and the site is capable of accommodating change without undue harm to

the wider landscape character and/or landscape features. Consequently, the development of the site would have negligible impact on the purpose of safeguarding the countryside from encroachment. This is demonstrated by the CGI image below.



CGI image of illustrative site layout and existing development beyond

25. In summary the site could be developed in a manner where there would be no/limited harm to the purposes of the Green Belt. It is capable of accommodating change without undue harm to the wider landscape character and/or landscape features. It is sustainably located adjacent to Euxton where moderate growth is to be directed. It has also already been established that there are no technical constraints to the development of the site.
26. It would contribute towards ensuring the Council's housing supply includes small and medium sized sites and is immediately available. Furthermore Metacre would be happy for the site to be specifically allocated for self-build properties in the Preferred Options, thereby meeting a specific need in Chorley.
27. It is therefore a most appropriate location for Green Belt release.

Other land to the west of Euxton

28. It is accepted that the larger area of land identified in the call for sites (site C) would result in a greater impact on purposes 1 and 3 of the Green Belt. However, the OLDS acknowledges that the M6 to the west of Euxton would form a strong alternative boundary feature that would limit impact on the wider Green Belt were development to take place in Green Belt parcel 15. As highlighted above when travelling from the M6 along Dawbers Lane into Euxton you pass various built development and urban features. When viewed on the ground the start of the



settlement is further west along Dawbers Lane than what it technically shown on the Local Plan policies map. Consequently if larger Green Belt release is deemed necessary to meet housing needs the wider area of land would present a logical location for such release.