

# Central Lancashire Local Plan 2023–2041 Regulation 19 Publication Plan Consultation

## Little Knowley Farm

On behalf of Castle Green Homes

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# Contents

EXECUTIVE SUMMARY .....	2
1. INTRODUCTION .....	4
2. SITE AND SURROUNDINGS .....	6
The Site .....	6
Surrounding Area .....	9
Planning History .....	10
3. EVIDENCE BASE REVIEW .....	11
Strategic Housing and Economic Land Availability Assessment (SHELAA).....	11
Housing and Employment Allocations: Site Selection process .....	12
Central Lancashire Housing Study Update.....	12
Chorley Borough Housing Demand and Need Assessment 2024.....	14
Preston City Deal.....	15
Duty to Co-operate .....	16
Housing Topic Paper – Approach to Housing Need and Redistribution .....	17
Density Study.....	18
Landscape .....	19
Level 1 SFRA 2024.....	20
Level 2 SFRA (2024) .....	21
Habitat Regulations Assessment (2025).....	22
Heritage Impact Assessment .....	23
Sustainability Evidence.....	23
4. CENTRAL LANCASHIRE LOCAL PLAN.....	27
Strategic Objectives.....	28
Strategic Objective 3 .....	28
Strategic Objective 9.....	28
Spatial Strategy – SS1: Development Patterns.....	29
Spatial Strategy – SS2: Settlement Hierarchy.....	29
Strategic Site Allocations .....	29
Policy HS1 Scale of Housing Growth and Distribution of Housing Requirements.....	29
Policy HS2: Housing Allocations in Chorley .....	32
Policy HS6: Housing Mix and Density.....	33
Policy HS7: Affordable housing.....	33
Policy EN1: Well Designed Places .....	35
Policy EN6: Biodiversity Net Gain .....	36
Policy EN8: Trees, Woodlands and Hedgerows .....	36
Appendix 2 – Monitoring Framework .....	37
5. CONCLUSIONS .....	38
Appendix 1 – LCC Committee Report on Samlesbury Enterprise Zone.....	39
Appendix 2 – Level 2 SFRA, Little Knowley .....	40
Appendix 3 – LLFA Response to Application Ref:22.00538/OUTMAJ.....	41
Appendix 4 – Ecology Response to Application ref:22/00538/OUTMAJ .....	42



## EXECUTIVE SUMMARY

- 1.1. Pegasus Group are instructed by Castle Green Homes (hereafter referred to as Castle Green) to make representations to the Central Lancashire Local Plan (CLLP) Regulation 19 Consultation (2025).
- 1.2. Overall, Castle Green fully supports the proposed allocation of the Little Knowley site HS2.10.
- 1.3. However, Castle Green do note that the proposed allocation does not fully reflect the evidence base, and the assessments undertaken for parcel Ref: 19C393a. The evidence clearly assesses a much larger parcel and the conclusion within the SHELAA at Appendix 4: suitable, available and achievable sites, confirms that parcel Ref: 19C393a [i.e. the entire parcel], should be a proposed allocation ref: HS2.10.
- 1.4. The CLLP claims to have been prepared to comply with the transitional arrangements set out in the NPPF<sup>1</sup> which state that  
*“for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need; . . .”*
- 1.5. As a result of the updated affordability ratios published on 24<sup>th</sup> March 2025, the Local Housing Need (LHN) figure now identifies a minimum need for 1,662 homes per annum or 31,578 homes over the proposed plan period (to 2042) in Central Lancashire.
- 1.6. This position will also continue to change as the housing stock data is updated annually in May and the affordability data is updated annually in March. Indeed, once the housing stock data is updated in May, the results of the LHN standard method will almost certainly increase further, reflecting the additions to the dwelling stock from 2023–24.
- 1.7. As drafted, the proposed housing requirement (1,314dpa) meets only 79% of the minimum Local Housing Need. Therefore, the transitional arrangements of the NPPF would not be engaged.
- 1.8. The re-distribution undertaken as part of the duty to co-operate, does not reflect the findings of the LHN. Nor does it reflect the recommendations of the Housing Study Update (HSU), which also broadly aligns with the SM housing figures.
- 1.9. In this situation, the distribution is, largely at the expense of Chorley is not justified and sees Chorley’s re-distributed housing figure only achieving 60% of the overall requirement identified by the Government’s latest LHN calculation
- 1.10. Thereafter, Castle Green explain that there are various alterations needed to the strategy and Policies to comply with paragraph 35 of the NPPF. This includes:

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<sup>1</sup> NPPF 2024 paragraph 234



- Strategic Objectives 3 and 9
- HS6: Housing Mix and density
- HS7: Affordable Housing
- EN1: Well Designed Places
- EN6: Biodiversity Net Gain
- EN8: Trees, Woodlands and Hedgerows

- 1.11. Castle Green also makes recommendations in respect of the monitoring of the plan, advocating an immediate review if this Plan is adopted with only 80% of the LHN figures as the Government's new LHN figure, has already changed housing need significantly in Central Lancashire. The shortfall is around 348p/a, which is in excess of 5,000 homes across a 15-year Plan period.
- 1.12. Castle Green welcomes the production of the CLLP and wish to support the three Councils in its preparation.



# 1. INTRODUCTION

- 1.1. Pegasus Group is instructed by Castle Green Homes (hereafter referred to as Castle Green) to make representations to the Central Lancashire Local Plan (CLLP) Regulation 19 Consultation (2025).
- 1.2. Pegasus Group has previously submitted representations to the CLLP in relation to the site controlled by Castle Green, supporting the allocation of the entire site, and consequently its neighbouring parcel to the south, for residential development (Ref: 19C393a).
- 1.3. Castle Green welcomes the production of the CLLP and wish to support the three Councils in its preparation. Modifications will however be required to the Plan in relation to the site itself, given that it is only partially to be allocated for residential development and to address certain issues of soundness, and particularly that more land needs to be identified for residential development to ensure that:
  - Enough flexibility has been built into the housing land supply to safeguard against the issues identified with the current supply;
  - Enough affordable housing will be delivered to address identified needs;
  - Homes are provided as soon as possible; and,
  - A diverse mix of housing can be provided to address the specific needs of the Borough.
- 1.4. Despite the representations submitted previously, there are some concerns around the sites that have been identified. At this stage, there remains a lack of evidence to support the assumptions being made in relation to the removal of part of the wider Little Knowley site from the proposed allocation. Pegasus Group will work with the Council to ensure that this evidence is robustly represented in the CLLP and to ensure the allocation of site ref: 19C393a in its entirety.
- 1.5. Critical to the identification of needs and distribution of housing sites is the evidence to support the choices in the CLLP, with reference to the Plan's Integrated Appraisal (IA), which again is covered in more detail in the following sections.
- 1.6. This representation also sets out some comments in respect of various policies, to ensure all relevant policies are fully supported by the necessary evidence so the three Central Lancashire Authorities can go on to prepare and adopt a sound Local Plan.
- 1.7. To assist the Local Plan process, the main aim of this representation is to ensure that the Local Plan is consistent with national policy specifically addressing the tests in paragraph 35/36 of the 2023/2024 NPPF, just noting that the CLLP is submitted under the transitional arrangements of the 2024 NPPF.

## **Report Structure**

- 1.8. The structure of these representations takes the following form:
  - Section 2 describes the site and the surrounding area in more detail;



- Section 3 reviews the evidence base;
- Section 4 considers the CLLP;
- Section 5 provides a conclusion.

## 2. SITE AND SURROUNDINGS

### The Site

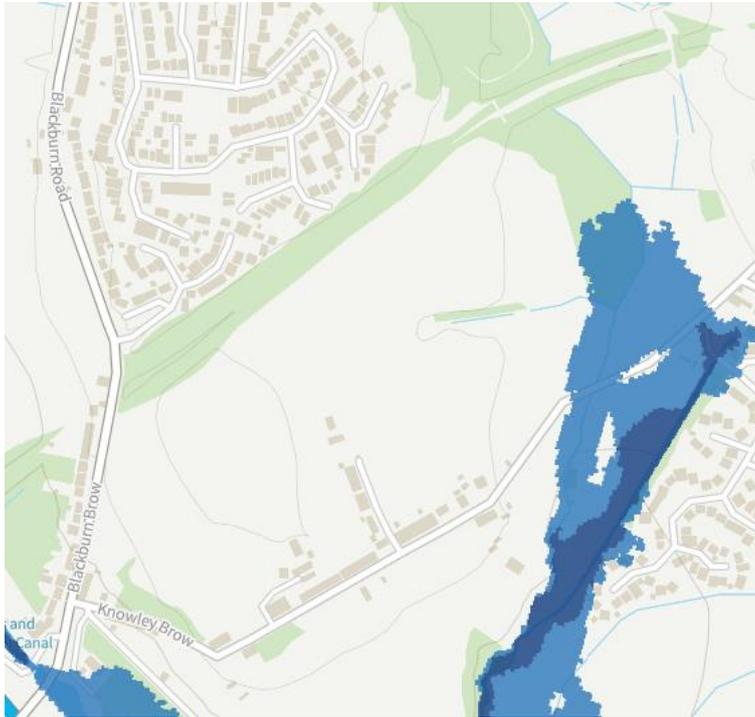
- 2.1. Castle Green has a development option on land known as Little Knowley Farm. The site is located east of Blackburn Brow and north of Heapey Road, Little Knowley, Chorley. The site comprises 15 ha of greenfield land located to the north-east of Chorley, beyond the M61 as identified on the plan below.

**Figure 1: Little Knowley Farm**



- 2.2. Two Public Right of Ways (PRoW) are located on site, in the form of footpaths. The first PRoW (footpath 36) is located in the western section of the site and provides connectivity between Blackburn Brow and Heapey Road. The second PRoW (footpath 21) is located in the eastern extremity of the site and provides connectivity to the wider PRoW network to the north of the site.
- 2.3. In terms of key site characteristics:
- The site is located predominately within Flood Zone 1 (lowest probability of flood risk), except for a very small section in the extreme east of the site which is located within Flood Zone 2.

**Figure 2: Flood Risk Map**



- The site is at very low risk of surface water flooding, with only two very small and localised areas of high flood risk in the centre of the site:

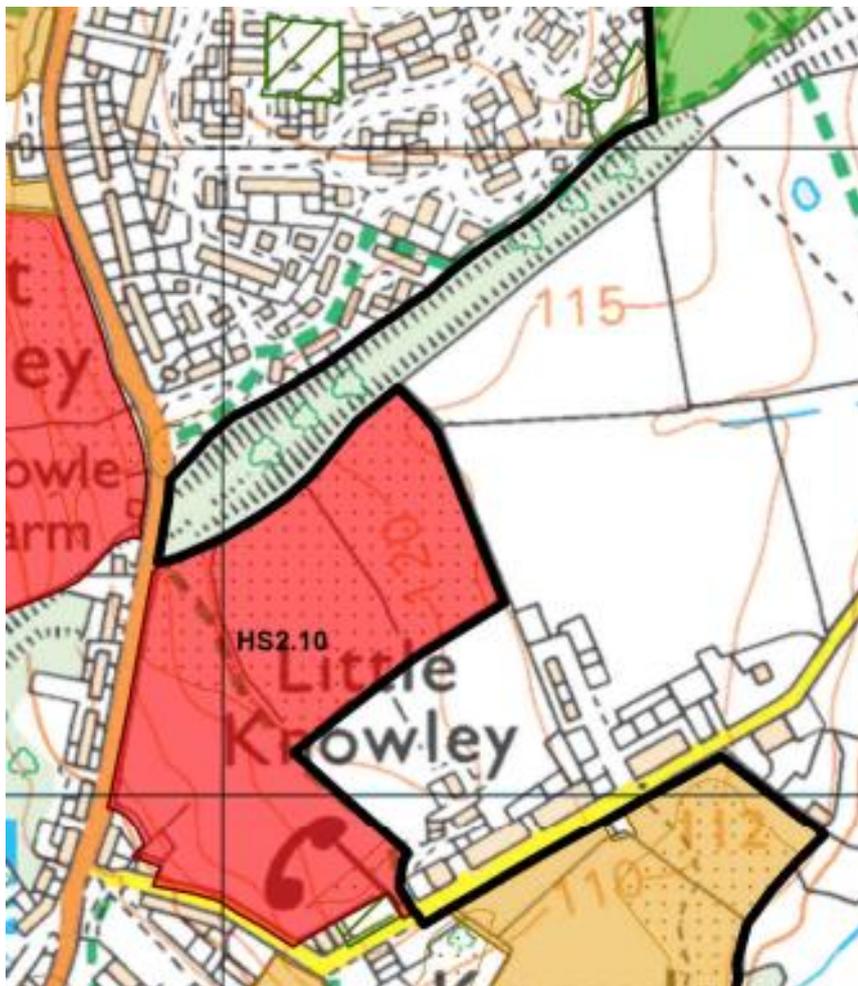
**Figure 3: Surface Water Flood Risk Map**



- A drainage easement is located in the eastern extent of the site.
- No Listed Buildings or Conservation Areas are located within the site boundary. The closest Listed Building is 'The Rough' (Grade II), which is the Hollies Private Day Nursery located on Heapey Road, around 200m, to the south of the site.
- The site is not subject to any statutory landscape designations such as SSSI, SACs etc.
- There are no protected trees (subject to a Tree Preservation Order) located on site.

2.4. Castle Green is promoting the entire site for housing allocation – and consider it to be a highly sustainable and suitable residential site. This is a point acknowledged by the Council, who have draft allocated (HS2.10) which covers the western extent of the site for a residential development of 150 no. dwellings.

**Figure 4: CLLP Draft Allocation**



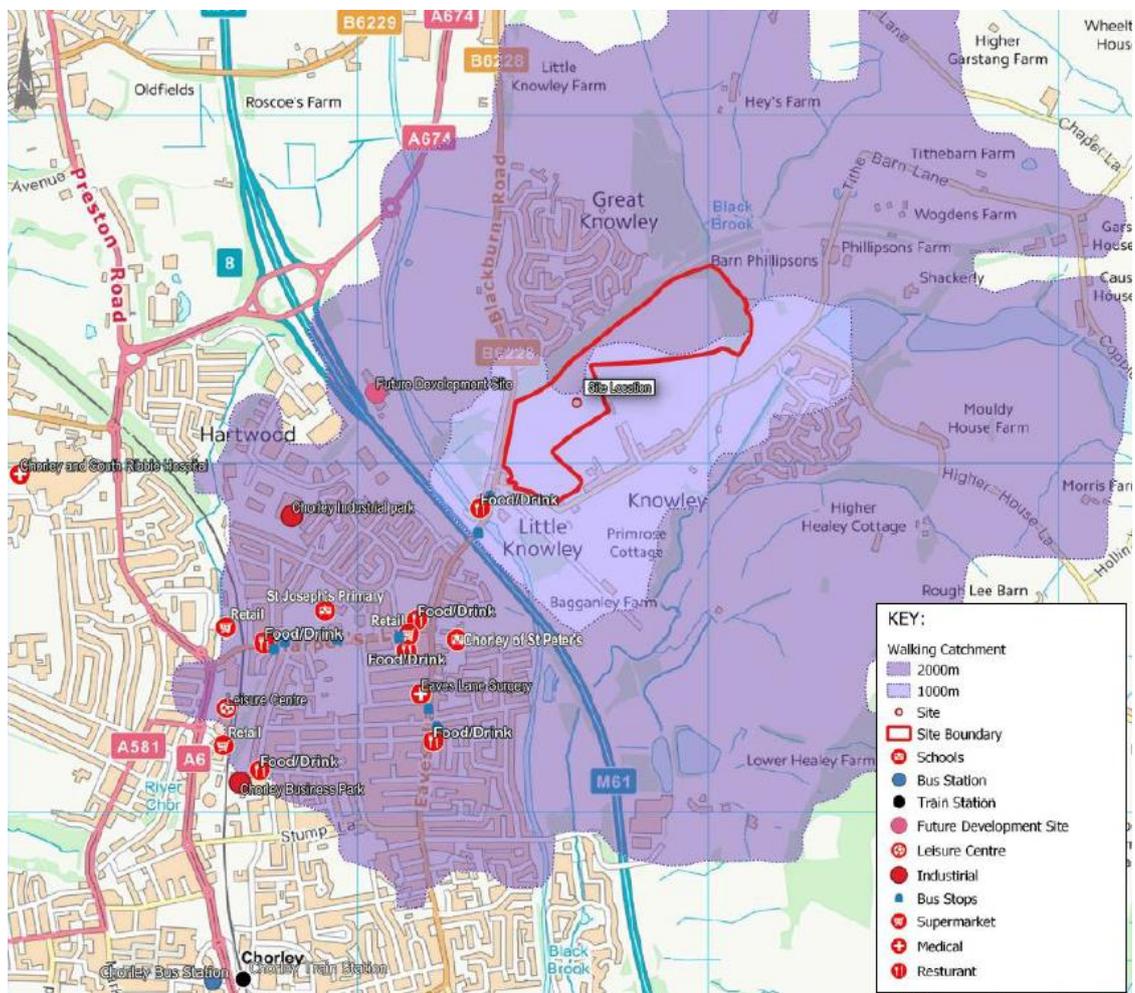
2.5. For the reasons explained throughout these Representations, we consider the entire Little Knowley Farm site to be suitable for residential allocation – and that additional land needs to be identified by Chorley to meet their development requirements.

- 2.6. The Little Knowley Farm site, as a non-Green Belt site in a Borough constrained by large areas of Green Belt, is a highly logical development option.

## Surrounding Area

- 2.7. The site benefits from sustainable location adjacent to the existing settlement boundary of Chorley – which is a Key Service Centre (Tier 2 settlement).
- 2.8. In terms of local facilities, the site benefits from a good location in relation to existing facilities and services in the local area. As shown on the site accessibility plan replicated below, there are numerous facilities within a 2km walk of the site including the residential areas of Great Knowley, and Knowley along with Hartwood and the large built-up area of Chorley Town to the west of the M61.

**Figure 5: Local Facilities**



- 2.9. St. Joseph's RC Primary School, St Peter's CoE Primary School and The Hollies Pre- School are all within an acceptable walking distance of the site. St. Michael's C of E High School is a little over 2km walk from the centre of the site.
- 2.10. In respect of public transport, there are existing bus stops located along both sides of the carriageway on the B6228 Blackburn Brow, within the recommended 400m walk distance



from the site. The existing stops on the B6228 Blackburn Brow are served by a number of bus services including two commercial and four dedicated school bus services.

- 2.11. Bus service 2 provides a hourly service throughout the week, Monday to Sunday, between Chorley and Blackburn. These buses provide access to residential areas in the vicinity of the site and larger interchanges in Chorley and Blackburn town centres. Additionally, the buses also run for seven days a week and link future residents to Chorley bus and rail stations which lead to various destinations across Lancashire.
- 2.12. Finally, the nearest train station is Chorley Railway Station and is located approximately 2.5km from the site. The station is located on the Manchester – Preston and Transpennine North West lines. The Manchester to Preston line calls at destinations such as Manchester, Bolton, Poulton-le-Fylde and Blackpool North. The Transpennine North West line links the station to destinations such as Lancaster, Carlisle and Edinburgh.

## Planning History

- 2.13. Planning application ref: 22/00538/OUTMAJ was submitted to Chorley in May 2022 seeking outline planning permission for the *“erection of up to 200 dwellings (including 30% affordable housing) with all matters reserved save for access from Blackburn Brow”*.
- 2.14. The application was processed in the usual way and there was various correspondence with the Local Planning Authority and updates provided in respect of ecology, biodiversity, highways and drainage to address initial questions posed by statutory consultees.
- 2.15. Despite the Council’s shortage of housing land supply at the time, the indication from Officers is that the application was slightly premature, so Castle Green decided to withdraw the application in February 2024.
- 2.16. What was established with the above information and the planning application is that the site benefits from a sustainable location and represents a highly logical and suitable housing site.

### 3. EVIDENCE BASE REVIEW

- 3.1. Given the stage of the process of the CLLP, there is a reasonably well-developed evidence base to support the plan. An overview of this is provided below.

#### **Strategic Housing and Economic Land Availability Assessment (SHELAA)**

- 3.2. The overall purpose of the SHELAA is to identify a future supply of land that is:
- suitable for housing or economic development uses.
  - available for development now or at a point during the plan period.
  - achievable (i.e. likely to be viably developed during the plan period and at the point envisaged).
- 3.3. The opening site survey stage involved an initial overview of the sites identified at Stage 1(a) to be taken forward into a Stage 2(b) assessment to identify those that are potentially suitable for development, and which would warrant further detailed assessment at Stage 2.
- 3.4. Paragraph 2.13 confirms that *“Sites that are somewhat affected by one (or a combination) of the above constraints (i.e. partially constrained sites) were taken forward to Stage 2 in order to gain a more detailed understanding of the extent to which they may or may not be suitable for development”*.
- 3.5. Just pausing on the factors that were included when assessing the suitability of sites, the potential effect upon ‘landscape features and character’ is included at paragraph 2.18. Despite this, and contrary to the landscape evidence (discussed further below), the Little Knowley site does not perform strongly from a landscape perspective.
- 3.6. The potential densities of sites are set out at paragraphs 2.21–2.28, just noting the reference to the Lancashire Housing Density Study. The issues with the Density Study are covered further below, but it is a backwards looking assessment from 2022, so prior to many new requirements for sites including Biodiversity Net Gain (BNG). As such, the quantum of development for many sites will be overestimated and this needs to be factored into the overall supply of homes from the sites selected.
- 3.7. Stage 2 of the SHELAA assesses the suitability, availability, and achievability of sites taken forward following the Stage 1(b) assessment.
- 3.8. Thereafter, the SHLEAA outlines an overall assessment for each site, based on the results of the suitability, availability, and achievability assessments. This seeks to identify the development potential of each site over the plan period. It does however set out in paragraph 3.24 that *“Following the detailed assessments a number of sites were discounted as they were identified as not being suitable, available, and/or achievable. Appendix 3 includes a schedule of these sites along with the reason they were discounted”*
- 3.9. Looking closer at Appendix 3, various smaller parcels are identified within Appendix 1: Discounted Stage 1(b) sites covering the Castle Green site (ref: 19C109, 19C120 and

19C393ax). Each parcel sets out that the “*entire site taken forward under 19C393a*”. There appears to be no separate assessment of the proposed allocated element of Little Knowley Farm and that which is not taken forward.

- 3.10. The conclusion within Appendix 4: suitable, available and achievable sites, confirms that parcel 19C393a [i.e. the entire parcel], is simply confirmed as a proposed allocation ref: HS2.10.
- 3.11. There is however no assessment as to why the wider site, as has been assessed throughout the CLLP evidence base, is not allocated in its entirety.
- 3.12. The wider site is confirmed to be suitable, available and achievable, which Castle Green confirm it is. Given the Council’s evidence base, which supports the allocation of the site, **this site needs to be allocated in its entirety.**
- 3.13. This will also seek to support the Council in respect of various wider issues Castle Green have to make in respect of the CLLP, as addressed further below.

## **Housing and Employment Allocations: Site Selection process**

- 3.14. Castle Green note the preparation of the site selection paper, which, as the introduction sets out, draws on the information in the SHELAA (para 1.3)
- 3.15. Just to clarify, paragraph 3.4 seeks to set out that in accordance with Stage 1(b) of the SHELAA methodology, sites were discounted if they were ‘affected by numerous constraints’.
- 3.16. This does not reflect the SEHLAA, as set out above. Paragraph 2.13 of the SHELAA is clear in confirming that “*Sites that are somewhat affected by one (or a combination) of the above constraints (i.e. partially constrained sites) were taken forward to Stage 2 in order to gain a more detailed understanding of the extent to which they may or may not be suitable for development.*”
- 3.17. Castle Green also take issue with paragraph 4.1 of the site selection paper, as allocations do not fully reflect the findings of the Stage 2 assessment, certainly in relation to parcel ref: 19C393a, as it is only partially allocated for development.
- 3.18. There are also issues with paragraph 4.2 which seeks to claim “*Sufficient sites have been allocated to meet the identified housing and employment needs*”
- 3.19. Castle Green will address these matters further below.

## **Central Lancashire Housing Study Update**

- 3.20. The Housing Study Update (HSU) was prepared to provide an updated assessment of housing need. It seeks to set out that the HSU has been prepared in the context of the December 2023 version of the NPPF, claiming that it is against this version of the NPPF which proposed the emerging Local Plan will be submitted and examined, following Regulation 19 consultation.
- 3.21. As set out in this representation, this may not be the case.

3.22. The HSU confirms that the recommended (or preferred) housing need scenario is the Employment-led (CR 1-to-1) scenario which corresponds to an equivalent **1,237 dwellings per annum**.

3.23. Paragraph 5.44 is relevant when it comes to the consideration of employment led scenarios in the HSU. This refers back to the Central Lancashire Employment Land Study (CLELS) and the labour supply model which at paragraph 3.8 of the CLELS confirms that:

*The methods discussed above are 'Policy Off' in that they make no allowance for any major public sector programmes which might generate jobs above the baseline. The 2017 and 2019 Central Lancashire Employment Land Studies incorporated 'Policy On' Scenarios considering the extra jobs estimated to be created by the Salmesbury Enterprise Zone and City Deal programmes in Preston and South Ribble. (Pegasus emphasis)*

3.24. This goes on further to confirm that:

*While there are other strategic projects proposed in Central Lancashire, at this time, most notably, the development of the National Cyber Security Centre at Salmesbury, there are no clear forecasts of the jobs growth resulting from these schemes which could inform a Policy On forecast. For this reason, a Policy On Scenario, relating to any active local programme is not undertaken here. (Pegasus emphasis)*

3.25. The 'next steps' section with the HSU explains that "The final housing requirement or requirements set in the Joint Local Plan may be different to the relative proportions within the recommended dwelling need scenario, depending on the Councils' further assessment of policy-on and plan-making considerations"

3.26. There does not appear to be any 'policy on' assessment to consider the implications of significant employment led opportunities which are likely to be created at locations, including the Salmesbury Investment Zone anywhere in the evidence base.

3.27. Despite the claim within the CLELS, there is broad data around the potential job creation at the National Cyber Force in Salmesbury. The Lancashire County Council Cabinet Committee Report from 16<sup>th</sup> January 2025 includes a Report from the Director of Growth and Regeneration in respect of the Salmesbury Enterprise Zone and Innovation Hub Proposal. This is enclosed at **Appendix 1**, and confirms:

***The Salmesbury Enterprise Zone continues to deliver growth, employment and investment opportunities for the broader benefit of Lancashire. Building on this established momentum, the future presence of the National Cyber Force in Lancashire creates a once in a generation opportunity to accelerate economic growth and regeneration. This move is forecast to generate up to 3,000 jobs in the County, as well as causing transformational economic uplift through increased contracts, relocation of leading organisations, and demand for the necessary skills that enable these operations.***

*As evidenced in a recently commissioned economic impact study, the total £5bn **National Cyber Force investment over the next decade could leverage a further 1,500 indirect jobs**, with salaries in the associated occupations being almost twice the current Lancashire average. A wider impact, which matches these new digital and cyber activities with the traditional strengths of the county's industrial base, has the potential to further transform and modernise Lancashire's local economy.*

- 3.28. Given an assessment has been undertaken and referred by Lancashire County Council (LCC) in order to demonstrate the economic benefits and the jobs to be created, it is not clear why this significant investment has not been factored into the evidence base for the emerging CLLP.
- 3.29. Nor does the evidence appear to have fully factored in existing commitments and investment impacts from the City Deal, which are likely to continue to deliver during the CLLP plan period.
- 3.30. Moving on, the HSU then goes on to provide a breakdown of what the economic led housing scenario means for each authority in terms of assumed population change, household change, net migration, employment and dwellings equivalent, which is set out below:

**Employment-Led Housing Need Scenario Summary**

Area	Change 2023 - 2041				Average per year		
	Population Change	Population Change%	Households Change	Households Change%	Net Migration	Dwellings	Employment
Central Lancashire	33,088	8.6%	22,622	14.0%	1,978	1,237	894
Chorley	11,638	9.7%	7,229	14.2%	952	410	305
Preston	10,521	6.9%	8,423	13.7%	235	441	295
South Ribble	10,930	9.7%	6,970	14.1%	791	386	295

- 3.31. As will be discussed in detail below, the CLLP does not reflect the recommendations within the HSU in respect of the distribution of housing.
- 3.32. It is however noted that a separate duty to co-operate paper seeks to address this re-distribution which is also covered further below.

**Chorley Borough Housing Demand and Need Assessment 2024**

- 3.33. It is set out in the introduction that the Chorley Borough Housing Demand and Need Assessment (HDNA) 2024 update seeks to provide the council with up-to-date evidence on housing need across all sections of the community over the period 2023 – 2041. The evidence will inform the update of the preparation of the Local Plan.
- 3.34. It is not clear how this interacts with the HSU set out above.
- 3.35. The HDNA confirms on page 9/paragraph 1.18 that the proposed annual target for housing is 410 dwellings each year. Pegasus Group do note that this does not correspond with Chorley’s overall housing figure taken forward in the CLLP.
- 3.36. Notwithstanding the above, it is assumed that the HDNA is an evidence base document that is seeking to set out an indicative mix of properties to be delivered in Chorley across the plan period, along with wider recommendations around specialist elements such as M4(3), self-build and affordable homes.
- 3.37. Based on the suppressed housing need based identified in the HSU, Paragraph 5.2 is clear in setting out that:

*A detailed analysis of affordable housing need in accordance with PPG is presented in Technical Appendix C. This **establishes an overall gross affordable need of 728** and, after taking into account affordable lettings and pipeline newbuild, the net shortfall is 53 each year (assuming any existing affordable need backlog is cleared over 10 years or 303 if cleared over 5 years). This compares with 113 affordable dwellings each year (assuming a backlog clearance over 5 years).*

*Planning Practice Guidance is clear that only a proportion of need is expected to be delivered through the planning process*

3.38. As such, from the evidence presented, the CLLP will not deliver the affordable housing needed across the Local Plan area as this is more than 50% of the overall housing requirement as set out in the CLLP.

3.39. It is also noted in paragraph 6.8 that:

*It is estimated there is a need for 2,648 additional C3 dwelling units over the period 2023 to 2041 or 147 each year, a need for 655 C2 Extra Care units or 36 each year, and 103 C2 residential care bedspaces or 6 each year. **The C3 units should be included in the overall housing figure. Delivery of C2 units would be in addition to this figure.***

3.40. The inclusion of C3 units within the overall figure needs to be clarified.

3.41. Overall, the Council claim to have proceeded with the Employment-led (CR 1-to-1) scenario which corresponds to an equivalent 1,237 dwellings per annum. This is likely to be an underestimation of the actual employment led housing need given the national cyber security and its associated benefits have not been incorporated.

3.42. But the shortfall in housing needs are even more severe given the evidence relating to affordable housing needs and also the above C3 dwelling units set out above.

## **Preston City Deal**

3.43. Castle Green note the inclusion of this document within the evidence base for the CLLP, despite it not appearing to be dated.

3.44. The document confirms the joint commitment to ensure full implementation of the Preston, South Ribble and Lancashire City Deal, proposed by the Lancashire, Preston and South Ribble Local Authorities and the Lancashire Local Enterprise Partnership.

3.45. Over a ten-year period, the deal was expected to generate:

- More than 20,000 net new private sector jobs, including 5,000 in the Lancashire Enterprise Zone;
- Nearly £1 billion growth in Gross Value Added (GVA);
- 17,420 new homes; and
- £2.3 billion in leveraged commercial investment

3.46. This is clearly a significant investment in the City Region.

- 3.47. Castle Green are also aware that discussions are ongoing about a potential new City Deal. We expect the Council to be able to provide further update on this at the Examination.
- 3.48. The investments to date should be delivering demonstrable benefits, which should be reflected within the wider evidence base. The wider evidence base also needs to capture future benefits that flow from this City Deal and this needs to be fully articulated within the CLLP, not least the anticipated trajectory of homes set out on page 11 of the City Region deal, against the actual delivery.

### Duty to Co-operate

- 3.49. The Duty to Co-operate document (DtC) seeks to set out how the duty to co-operate, as expected by paragraph 24 of the 2024 NPPF, has been complied with by the three Central Lancashire authorities.
- 3.50. Section 4.2 provides an overview of the distribution of housing and paragraph 4.3 sets out a series of housing requirements for Central Lancashire. This is re-presented below at Table 1, focusing on the 2023 Local Housing Need (LHN) requirement, despite there being a more up to date 2024 LHN requirement, along with the recommended approach as identified in the HSU:

**Table 1: 2023 LHN & HSU housing need figures**

Authority	2023 Local Housing Need figure	Percentage	HSU recommended figure	Percentage
Chorley	506	54%	410	33%
Preston	269	28%	441	36%
South Ribble	169	18%	386	31%
<b>Total</b>	<b>944</b>		<b>1,237</b>	

- 3.51. It is noted that this table is a different approach to that set out in the interim duty to co-operate statement which referred to the 2024 SM.
- 3.52. The DtC paper sets out that the spatial growth pattern through Policies SS1 and SS2 required a re-distribution of the housing need (paragraph 4.5).
- 3.53. Coupled with this, paragraph 4.7 sets out:

*“the overall housing requirement was increased slightly to 1,314 dwellings per annum in order to meet the transitional arrangements set out in the NPPF which require local authorities to achieve at least 80% of LHN (calculated using the new standard method formula) to progress to Regulation 19 under the previous version of the NPPF. This increase could be met without the need to allocate additional land”.*

3.54. Overall, there appears to have been agreement between the three Council's around the redistribution of housing numbers, which is set out below at Table 2, along with the updated LHN figures using updated affordability ratio data issued by the Government in March 2025

**Table 2: Distribution of housing requirements against 2024 & 2025 LHN Figures**

LPA	2024 LHN figure	%	2025 LHN figure	%	CLLP Revised Housing Figure	%	Redistribution as a percentage of 2025 SM figure
Chorley	564	34%	554	33%	334	25%	60%
Preston	590	36%	616	37%	520	40%	84%
South Ribble	489	30%	492	30%	460	35%	93%
<b>Total</b>	<b>1,643</b>		<b>1,662</b>		<b>1,314</b>		

3.55. The re-distribution undertaken as part of the duty to co-operate, does not reflect LHN (2024 version or the 2025 update to reflect new affordability ratio). Nor does it reflect the recommendations of the HSU, which it should be noted broadly match the LHN figures.

3.56. As such, there needs to be a clear assessment as to why the distribution has changed so dramatically, largely at the expense of Chorley's housing figures. The implications also need to be assessed against the economic growth aspirations of the three Council's, again referring back to the employment led housing figures.

3.57. In addition to this, it should be noted that given the changes in LHN, **the CLLP as drafted fails to achieve 80% of the new LHN figure - it is now 79%**. As such the CLLP would not benefit from the transitional arrangements in the NPPF paragraph 234.

3.58. Furthermore, it is also noted that Chorley's re-distributed housing figure is only 60% of the overall requirement.

3.59. Therefore, the re-distribution needs to be revised to direct more residential development towards Chorley, as advocated by the Council's own evidence and also the Government's new LHN calculation.

## Housing Topic Paper – Approach to Housing Need and Redistribution

3.60. This provides further justification in respect of the approach taken forward, confirming that the selected 1,237dpa figure from the employment led scenario updates, applying 2021 census activity rates, was selected as the recommended scenario as it:

- Aligns housing need with anticipated jobs growth.

- Reinforces sustainable patterns of commuting.
- Reflects market signals, including economic growth ambitions and previous rates of delivery (in accordance with NPPF)

3.61. Following this a 'policy on' scenario is considered, which amongst other elements makes reference to the City Deal, which is confirmed as a 'key factor' in the approach. It is noted that this still does not include the outputs from the National Cyber Security Centre at Samlesbury.

3.62. An overall redistribution of need has been identified as what the Councils consider *"appropriate to ensure delivery of new sites confirm with the spatial strategy and to enable existing commitments to come forward"*.

3.63. The redistribution is then further arbitrarily updated to reflect the transitional arrangements in the NPPF to achieve 80% of the SM housing figure. This required the redistribution of 77 dwellings per year, noting that this has increased given the revision to the LHN figure as set out above.

3.64. The overall summary is that

*Taken the above into consideration, the councils consider that the supply identified and the approach taken is sufficient to meet the transitional arrangements set out in the NPPF (December 2024), and consider this approach is justified to progress the plan under Regulation 19.*

3.65. As set out above, this is no longer the case as affordability information has been revised, which has amended the LHN figure. As drafted the CLLP does not meet the 80% threshold within the NPPF, as set out in paragraph 234.

3.66. Therefore, the Council should develop a plan to deliver the current LHN figure in full. The Council's should also revisit the distribution of housing across the plan period to ensure that Chorley makes its full contribution to housing needs in this area.

## **Density Study**

3.67. This evidence base is developed to understand the densities that have been achieved across residential sites, to inform assumptions about the potential development capacity of sites being considered for allocation under the new CLLP. As well as informing allocation capacity assumptions, the work will also be applied to the sites which the Councils identify and include within their SHELAA as we have set out above.

3.68. It needs to be noted that the study provides a retrospective review of completed sites and was completed in 2022.

3.69. The obvious issues this causes is that the sites developed in 2022 did not need to provide for the mandatory BNG requirements. This can have significant implications for site density. Furthermore, it does not appear to mention any M4 requirements, which will also have density implications for development sites.

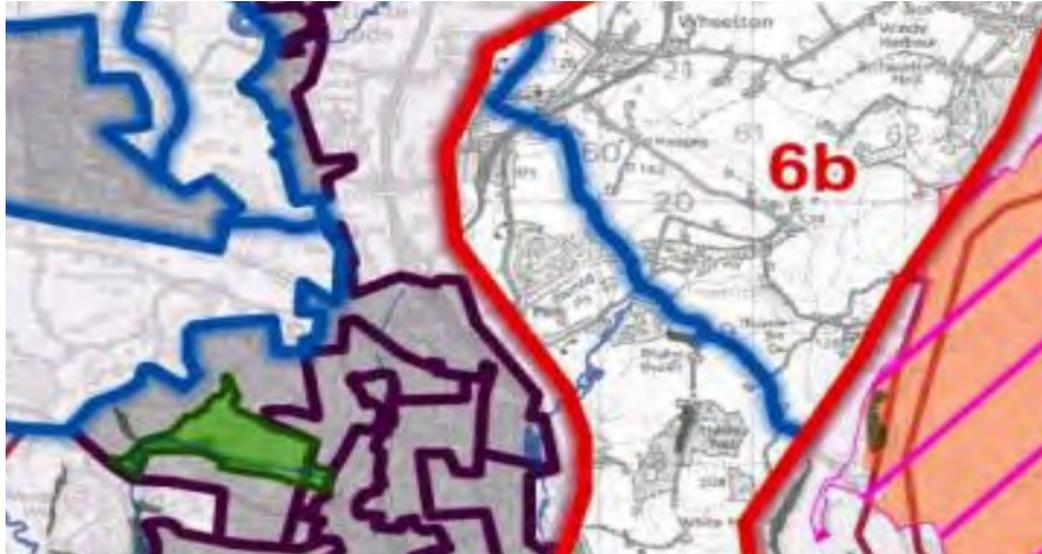
3.70. This evidence should be fully updated to comply with current requirements for housing sites or be used with significant amount of caution and flexibility to consider the likely net

developable area of sites and then guide the potential development capacity of identified sites. It will likely overestimate capacity and therefore underestimate the amount of land that needs to be identified for development.

## Landscape

- 3.71. This was undertaken by LUC to provide strategic assessments of how land in the area:
- demonstrates valued landscape characteristics (including the identification of any areas where landscape quality can be considered of 'above ordinary' value);
  - provides landscape settings which are important to the character of settlements;
  - maintains gaps between settlements in the Preston City Council area that are not designated as part of its Open Countryside (policy EN1) area; and
  - contributes to the Green Belt purposes as defined in paragraph 138 of the National Planning Policy Framework (NPPF)
- 3.72. The main purpose of the analysis is to help determine whether an area-based policy identifying areas of local landscape value, such as Chorley policy BNE2, is appropriate in the joint Local Plan and, if so, which areas might be considered for inclusion.
- 3.73. For each relevant village or larger settlements, the strategic assessment provides an overview of the settlement's character/identity and the extent to which its relationship with the surrounding landscape is important in contributing to that character. It also summarises key elements of that setting and concludes whether the landscape setting makes:
- a particularly important contribution to the character of a settlement;
  - a reasonably important contribution to the character of a settlement; or
  - a limited contribution to the character of a settlement
- 3.74. Just looking at Little Knowley site, this is located within the West Pennine Foothills area (LCA 6b), where the overview below confirms there are no absolute constraints on the site, just noting the blue line to the east of the site is a break between the sub areas. Other constraints noted are the public footpaths within the east and west of the site and the listed building beyond its southern boundary.

**Figure 6: Little Knowley Farm – Extract from West Pennine Foothills Assessment**



- 3.75. Looking at the sub area 6Bii, within which the site is located, page 67 of Appendix A confirms that following the detailed assessment, as undertaken, *“the landscape is not considered to have ‘above ordinary’ landscape value”*.
- 3.76. Looking at Appendix B and the consideration of the settlement setting assessment, the site is included within the Great Knowley area (Page 76). This reiterates the above assessment of the public right of ways crossing north/south across the site and also the listed farmhouse just to the south of the site.
- 3.77. Overall, the conclusion on page 78 is that the *“landscape setting makes a limited contribution to the character of Great Knowley”*.
- 3.78. Overall, this specific site assessment does not indicate that the Little Knowley site performs strongly from a landscape perspective – that being from the assessed in respect of landscape value and also settlement setting.
- 3.79. Given the assessment above, the site should not be constrained by any replacement BNE2 Policy and there is no landscape evidence as to why this site is not allocated in its entirety.

### **Level 1 SFRA 2024**

- 3.80. The Level 1 Strategic Flood Risk Assessment (SFRA) was an update to the previous SFRA, completed in 2021. It was updated to use the latest flood risk information available at the time of writing, together with the most current flood risk and planning policy available from the National Planning Policy Framework (NPPF) (2024) and Flood Risk and Coastal Change Planning Practice Guidance (FRCC-PPG) (2022).
- 3.81. The supplied potential development sites are shown to be at varying risk from fluvial, tidal and surface water flooding. Development consideration assessments for all sites are summarised through four strategic recommendations within Appendix E and the development sites assessment spreadsheet in Appendix C.

- 3.82. It is fair to say that this is a generalised assessment, based on the initial sites selected and location plans drawn by the Council(s). This is the case for the Little Knowley site, in so far as the overarching assessment identifies a small amount of the site to be within FZ 2 and 3b. However, upon closer inspection, it is clear that this area is to the far eastern portion of the site, within an area which is heavily wooded and would not be developed.
- 3.83. As set out in the recommended next steps for parcel 19C393a, the site boundary can easily be re-drawn to exclude this wooded area and therefore the area subject to FZ2 and 3b. This would only remove around 5% of the overall assessed site. This will ensure that the site is completely outside of any flood zone. This amendment would also not reduce any development quantum on the site given the location of the areas subject to flooding are incapable of being developed.

## Level 2 SFRA (2024)

- 3.84. The site is assessed in detail, to include all forms of flooding, but also from a cumulative perspective to consider whether the site is safe for the lifetime of the development and that it would not increase flood risk, elsewhere.
- 3.85. The full Stage 2 SFRA assessment is enclosed at **Appendix 2**, but the summary and recommendation in paragraph 131.2 sets out that based on the evidence presented in the Level 1 SFRA (2025) and the Level 2 SFRA:
- *The proposed development of the site would see a change in the risk classification from less vulnerable to more vulnerable, according to NPFF.*
  - *Given the change in use and therefore vulnerability of the site. The FRA must show that the development can be designed to be safe and that there is adequate emergency planning provision (para 014 FRC-PPG).*
  - *There should be no development within the functional floodplain. There should be no development within 8m of Black Brook. This should be converted to a blue / green corridor to provide ecological, amenity and social value.*
  - *Updated present day and climate change modelling of the reach of Black Brook adjacent to the site should be used to update this Level 2 SFRA at the earliest opportunity to provide a robust strategic assessment of flood risk to this site and surrounding areas. It would also be acceptable to use updated modelling to suitably assess risk through a site-specific FRA, as well as/instead of a Level 2 SFRA update.*
  - *Residual risk to the site from a possible blockage of the culvert beneath Heapey Lane should be considered as part of a site-specific FRA.*
  - *Based on current information, **this site could be allocated if more vulnerable development avoids the area within the functional floodplain and the area to the south of the site modelled to be at risk in the 1% AEP event + 47% climate change following detailed modelling of the reach of Black Brook adjacent to the site.***
  - *A detailed drainage strategy will be required for any new development given the large area of this site being converted from open space to development.*

- *Groundwater conditions must be investigated further through the site-specific FRA.*
  - *Any FRA should be carried out in line with the NPPF; FRCC-PPG; EA guidance; Central Lancashire Local Plan and LLFA policies; and national and local SuDS policy and guidelines.*
- 3.86. Given the approach within the evidence base in respect of the site, there are no matters that cannot or will not be resolved, certainly when the site is understood in detail e.g. no development in the flood zone, which is unlikely in any case.
- 3.87. Indeed, the FRA and the drainage strategy which supported the previous planning application on the site demonstrated at that time that there are no issues with the site coming forward for a residential development. This was confirmed in the LLFA response to the application which is enclosed at **Appendix 3**.
- 3.88. The entire site is suitable to be allocated from a flood risk perspective. Nevertheless, amending the red edge to exclude the eastern and part of the southern edge of the site would result in none of the site being subject to any flood risk issues.
- 3.89. This slightly smaller site (circa 5% less than the assessment), should be taken forward through the CLLP.

## **Habitat Regulations Assessment (2025)**

- 3.90. As set out in the open sections of the assessment, the purpose of the Habitat Regulations Assessment (HRA) was to determine whether the new Local Plan will have likely significant effects on any sites designated as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), or Ramsar sites.

There are site specific assessments and this includes the Little Knowley Farm parcel. In summary the HRA sets out:

- Assessment of Suitability for Ribble and Alt Estuaries SPA and Ramsar Qualifying birds – Moderate
  - Assessment of Suitability for Martin Mere SPA and Ramsar Qualifying birds – Moderate
- 3.91. Castle Green note that there is no specific commentary on wintering birds, despite the allocation specific requirement within the draft allocation. No justification appears to be provided by the Council on this matter.
- 3.1. Furthermore, it is noted that the ecological comments for planning application submitted at the site (Ref:22/OO538) accepted that the site is “highly unlikely to have high importance for birds” (**Appendix 4**).
- 3.2. The Little Knowley Farm site is not constrained from an ecological perspective.

## Heritage Impact Assessment

- 3.3. The purpose of the Heritage Impact Assessment (HIA) was to inform the site selection process of the Local Plan. Through the assessment of the historic environment, the potential impacts of an allocation on a site with designated or non-designated assets is identified and consideration is given as to what mitigation measures can be put in place.
- 3.4. Page 44 of the assessment covers Little Knowley Farm (ref: 19c393a) and this is clear that the entire site, as assessed:

*“provides no contribution to the significance of the heritage asset and it’s setting therefore development of the site will have no impact on the heritage asset.”*

## Sustainability Evidence

### Reasonable Alternatives

- 3.5. The Sustainability Appraisal must judge the proposed Local Plan against reasonable alternatives to ensure it is the most appropriate option to deliver the collective requirements of sustainable development. The whole process should identify ways the Local Plan can contribute to improvements in economic, social and environmental conditions as well as mitigating any potential adverse effects that the plan may cause. This will ensure that the plan is the most appropriate against the reasonable alternatives and can be used to test the evidence underpinning the plan and is important in demonstrating how the tests of soundness have been met.
- 3.6. In the context of this Local Plan, a key component for the Sustainability Appraisal will be to determine how many homes need to be delivered over the next 15–20 years and where to place them. Regarding the quantum of new homes to be delivered, a number of options must be tested in the IA, and these should be considered in terms of their impact on the economic, social and environmental characteristics of the Borough.
- 3.7. Chapter 4 includes an overview of the alternative options for the amount of housing and employment development to be provided and for its spatial distribution.
- 3.8. The IA at paragraph 2.23 sets out that the Central Lancashire Housing Study Update identifies nine scenarios for assessing local housing needs, as it was considered that the *“Government’s Standard Method may not adequately reflect each district’s current and future demographic trends and market signals”*. The HSU excluded five of these nine scenarios, as they are based on trend-based projections which have been historically volatile in Central Lancashire and so are unlikely to accurately capture all circumstances to be considered in assessing actual housing needs. This left the following four scenarios:
- Local Housing Need (LHN) Baseline: 944 dwellings per annum (Chorley = 54% / Preston = 29% / South Ribble = 18%).
  - POPGROUP 5-Year (10yr International Migration): 1,212 dwellings per annum (Chorley = 27% / Preston 54% / South Ribble 19%)
  - Employment-Led Projection (2011 Commuting Ratio): 1,275 dwellings per annum (Chorley = 38% / Preston 30% / South Ribble 33%).

- Employment-Led Projection (1:1 commuting for new jobs): 1,237 dwellings per annum (Chorley = 33% / Preston = 36% / South Ribble = 31%). The new SA now includes a further refined housing strategy of 447dpa.

3.9. The last two of these four options have a very similar annual housing figure and distribution between the three authorities and so were grouped for the purposes of the IA. Overall, three options were subject to IA:

- Option 1: LHN Baseline – 944 dwellings per annum –
  - Chorley = 54%
  - Preston = 29%
  - South Ribble = 18%
- Option 2: POPGROUP 5-Year (10yr International Migration) – 1,212 dwellings per annum
  - Chorley = 27%
  - Preston = 54%
  - South Ribble = 19%
- Option 3: Employment-Led Projection (2011 Commuting Ratio / 1:1 commuting for new jobs) – 1,237 to 1,275 dwellings per annum
  - Chorley = 33-38%
  - Preston = 30-36%
  - South Ribble = 31-33%

3.10. It is welcomed that the Sustainability Appraisal considers, as reasonable alternatives, spatial options which would allow for a higher housing target to be achieved than the Government’s previous SM approach to housing.

3.11. At paragraph 4.6 it sets out an overview of the options and confirms that “*Option 2 performs most poorly against the IA objectives, while Options 1 and 3 perform similarly*”.

3.12. Despite the above summary, para 4.7 confirms the preferred amount, which states:

*The Councils considered that a range of indicators continued to comprehensively support the conclusion that housing need within Central Lancashire exceeds the result of the Government’s Standard Method (pre-December 2024) and intended to take forward Option 3. **Following publication of the updated NPPF in December 2024, the annual housing requirement for Central Lancashire has been increased slightly to 1,314 dwellings per annum in order to achieve 80% of the local housing need using the new standard method formula, in accordance with the transitional arrangements.** (Pegasus emphasis)*

- 3.13. Therefore, despite identifying a series of options and appraising them in accordance with the IA, the Councils have simply selected 80% of the Government’s new LHN standard method figure at the time of the drafting of the Local Plan.
- 3.14. This has wider implications, as we set out further below in respect of the housing needs identified in the CLLP.
- 3.15. It needs to be noted that since the issuing of the LP for consultation, Government issued new data on housing affordability on 24 March 2025. There are some significant implications for this in respect of the Local Plan, as drafted, and the transitional arrangements as set out above and in the NPPF.
- 3.16. Just looking at the affordability ratio impacts in respect of the three Local Authorities, the relevant LHN is set out at Table 3 below.

**Table 3: Affordability Ratio Impacts**

Authority	Previous LHN	New LHN
Chorley	564	554
Preston	590	616
South Ribble	489	492
Total	1,643	1,662
80% to comply with transitional arrangements	1,314	1,329

- 3.17. Therefore, given the changes in the affordability ratio, the CLLP, as drafted, would no longer comply with the transitional arrangements of the NPPF.
- 3.18. As such, the emerging CLLP should seek to deliver the full LHN and should be examined against the 2024 version of the NPPF.

**Sustainability Issues**

- 3.19. Table 3.1 of the IA sets out the key sustainability matters for the CLLP. Housing is identified as a key sustainability matter, setting out that *“There is a need to provide a sustainable supply of housing land including for an appropriate mix of sizes, type, and tenures in appropriate locations to meet the local housing need and to support economic growth”*
- 3.20. It goes on to state in the ‘evolution without the Local Plan’ section that *“Without the implementation of the Local Plan to guide development, particularly in relation to the **high level of housing growth stipulated in the City Deal**, there is potential for a shortfall in housing types, with missed opportunities to address affordable housing particularly for first time buyers, which could create social and economic disparities across the districts”.*

- 3.21. This is not reflected within the evidence base, as drafted, to support the CLLP. Furthermore, the significant investment at the National Cyber Security Centre at Samsbury is not reflected within the evidence base, as set out above.
- 3.22. As it stands, simply seeking to achieve 80% of the Government's LHN figure will not support the growth envisaged, but this has not been adequately addressed in the Sustainability Appraisal.

#### **Site Assessments**

- 3.23. This is covered in chapter 5 of the IA. In respect of the Castle Green site (Ref:19C393a), it is clear from the evidence base review above that the site was assessed as a whole, not the parcel which has been taken forward for allocation. It is however noted that the wider parcel performs reasonably well from a sustainability perspective and is not identified as one of 15 less sustainable options identified in paragraph 5.45.
- 3.24. It is supported that the site is allocated for development, but the assessment is for the site as a whole, so the allocation of the site needs to reflect this evidence.

## 4. CENTRAL LANCASHIRE LOCAL PLAN

- 4.1. The 2024 National Planning Policy Framework (NPPF) states that Local Plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings.
- 4.2. The transitional arrangements set out in the NPPF<sup>2</sup> state that:
- “for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need; . . .”*
- 4.3. As set out in the evidence section above, the CLLP, as drafted, fails to meet at least of 80% of local housing need.
- 4.4. Therefore, the Plan needs to be examined against the 2024 NPPF.
- 4.5. Paragraph 16 goes onto state that plans should:
- a) *be prepared with the objective of contributing to the achievement of sustainable development*
  - b) *be prepared positively, in a way that is aspirational but deliverable;*
  - c) *be shaped by early, proportionate, and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
  - d) *contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
  - e) *be accessible through the use of digital tools to assist public involvement and policy presentation; and*
  - f) *serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in the Framework, where relevant).*
- 4.6. Paragraph 26 is relevant in this situation, as it expects effective and on-going joint working between strategic policy-making authorities and relevant bodies, as it is integral to the production of a positively prepared and justified strategy.
- 4.7. Paragraph 32 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This section will assess the emerging Policies of the Local Plan against national policy, especially in relation to paragraph 32 and the evidence discussed further above. This paragraph also expects that the evidence should be

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<sup>2</sup> NPPF 2024 paragraph 234

adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and should take into account relevant market signals

4.8. Given the stage of the process of the Local Plan, paragraph 36 is relevant as this identifies that Local Plans will be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- **Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- **Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

4.9. The policies and supporting text relating to the overall housing requirement and distribution strategy have been largely covered later in this report.

## Strategic Objectives

4.10. Castle Green is also in general support of the strategic objectives, although we do have some specific comments on the wording.

### Strategic Objective 3

4.11. Firstly, SO3 (Sustainable Communities) states that the Council will be "*Providing a scale and mix of housing types and sizes and a variety of tenures in a range of locations to meet economic aspirations and local housing needs*".

4.12. This suggests the Council intend to only just meet identified needs, which are less than the minimum requirements the Plan should be delivering as identified in the NPPF.

4.13. The NPPF requires plans to be 'positively prepared' and to 'boost significantly' the supply of housing. As such, the Council should be seeking to surpass their needs, so we recommend that the wording be updated to reflect this.

### Strategic Objective 9

4.14. SO6 (Natural Environment) states that the Council wish "*To conserve and enhance the natural environment including designated and un-designated landscapes and biodiversity*".

4.15. Castle Green generally support this statement; however, we do consider that the focus should only be on designated landscapes, to ensure that those which are not suitable for

formal designation are not provided the same level of protection. This, in turn, could constrain suitable, sustainable locations from much needed development.

## **Spatial Strategy – SS1: Development Patterns**

- 4.16. SS1 expects new housing, employment and commercial growth and associated infrastructure will be focused on the most sustainable locations in Central Lancashire. This is broadly supported.
- 4.17. For the strategy to be positively prepared and therefore sound, it needs to be sufficiently flexible. It is recommended that point 3 is amended to accommodate a scenario where needs are such that other locations need to be considered for development, which comply with other policies in the CLLP.
- 4.18. The Council's will need to be able to demonstrate with evidence that this strategy is deliverable and developable over the Plan period, will meet the varied housing needs and will not lead to a shortage of homes being delivered, so some flexibility within the spatial strategy is needed.

## **Spatial Strategy – SS2: Settlement Hierarchy**

- 4.19. The hierarchy is noted, but this needs to be justified by suitable evidence to demonstrate it is the most appropriate strategy. It needs to demonstrate that it supports a suitable and sustainable spatial distribution of sites and therefore provides an appropriate pattern of development. The evidence will also need to ensure suitable support for sustainable development within all market areas.

## **Strategic Site Allocations**

- 4.20. Castle Green would just note that the strategic site allocations will need to be suitably justified to deliver the quantum of development expected, given that in total they are expected to deliver in excess of 5,400 homes, or around 20% of the current homes needed in Central Lancashire.
- 4.21. At this stage, the strategy is to direct these three locations, noting that Pickering's farm is two sites in essentially one location and North-West Preston/Bartle and Preston West are adjacent to one another. These are also locations where there are some viability concerns.

## **Policy HS1 Scale of Housing Growth and Distribution of Housing Requirements**

### **Overall Housing Requirement**

- 4.22. The plan period appears to be 2023 to 2041. As the Councils will be aware, the NPPF<sup>3</sup> states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be

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<sup>3</sup> NPPF December 2024 Paragraph 22

set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery.

- 4.23. Given the stage of the Plan preparation and the anticipated lead in times for the potential submission, examination and adoption on the Plan, in order to ensure that the Plan covers the full 15 years on adoption, the Plan period should be extended until at least 2042. This needs to be monitored against the CLLP's progression through these stages.
- 4.24. The policy seeks to deliver a minimum of 1,314 net new dwellings per annum (dpa) over the plan period, going on to report that a range of site sizes and locations will be provided and that a housing trajectory will set out the projected rate of housing delivery.
- 4.25. Paragraph 4.19 of the Plan and various evidence base documents, state that following the publication of the revised NPPF in December 2024 the annual housing requirement for Central Lancashire has been increased slightly. The 1,314dpa proposed is claimed to achieve 80% of the LHN using the new standard method formula, in accordance with the transitional arrangements.
- 4.26. As is detailed above, this is incorrect, the CLLP, as drafted falls below this 80% transitional figure.
- 4.27. It is also noted that the supporting text within the plan at paragraph 4.15 is also incorrect as it seeks to justify the housing figures with reference to the employment evidence. As we know, the employment evidence does not determine the housing figure.
- 4.28. As set out above, as a result of the updated affordability ratios published on 24<sup>th</sup> March 2025, the LHN now identifies a minimum need for 1,662 homes per annum or 31,578 homes over the proposed plan period (to 2042) in Central Lancashire.
- 4.29. This position will also continue to change as the housing stock data is updated annually in May and the affordability data is updated annually in March. Indeed, once the housing stock data is updated in May, the results of the LHN standard method will almost certainly increase further, reflecting the additions to the dwelling stock from 2023–24.
- 4.30. As drafted, the proposed housing requirement meets only 79% of the minimum Local Housing Need. Therefore, the transitional arrangements of paragraph 234a of the NPPF would not be engaged.
- 4.31. In any case the transitional arrangements are not being appropriately used in this situation. The transitional arrangements should not be used as a way to reduce the housing requirement in Central Lancashire. The 77-dwelling addition to the employment led housing figure is largely arbitrary, simply trying to meet 80% of the LHN figure, which in any case it fails to achieve.
- 4.32. As the plan does not comply with the transitional arrangements, the minimum housing need figure in HS1 should therefore be calculated against the LHN. This will ensure that the Plan is positively prepared and would comply with the 2024 NPPF. The Plan period should also be extended to 2042 at the very least.
- 4.33. Without these changes the plan is not positively prepared and would not reflect national guidance so cannot be considered sound.

### Spatial Distribution

4.34. As set out in detail in the evidence review above, there appears to have been agreement between the three Council's around the redistribution of housing numbers, which is set out again below, along with the updated LHN figures using updated affordability ratio data issued by the Government in March 2025.

LPA	2025 SM figure	%	CLLP Revised Housing Figure	%	Redistribution as a percentage of 2025 SM figure
Chorley	554	33%	334	25%	60%
Preston	616	37%	520	40%	84%
South Ribble	492	30%	460	35%	93%
<b>Total</b>	<b>1,662</b>		<b>1,314</b>		

4.35. The re-distribution undertaken as part of the duty to co-operate, does not reflect the findings of the LHN. Nor does it reflect the recommendations of the HSU, which also broadly aligns with the SM housing figures.

4.36. In this situation, there needs to be a clear assessment as to why the distribution has changed so dramatically, largely at the expense of Chorley's housing figures. It is also noted that Chorley's re-distributed housing figure is only 60% of the overall requirement identified by the Government's latest LHN calculation.

4.37. Paragraph 4.20 states that the housing requirement in Chorley is to be stepped over the Plan period to take account of low delivery rates in the earlier years of the Plan. The requirement has been stepped from 280 dwellings per annum (dpa) in the first 3 years of the Plan period (2023/24 to 2025/26) increasing to 345 dpa from 2026/27 onwards. There does not appear to be any evidence to support this approach, and this will further exacerbate the lack of housing and affordable housing being provided in Chorley in the early part of the Plan period.

4.38. This housing shortfall also needs to be fully evidenced against the economic growth aspirations of the three Council's, again referring back to the employment led housing figures which are identified as the Council's preferred choice for housing growth.

4.39. Overall, the re-distribution needs to be revised to direct more residential development towards Chorley, as advocated by the Council's own evidence and also the Government's new LHN standard method calculation.

### Safeguarded Sites

4.40. The adopted Chorley Local Plan includes Policy BNE3 of which identifies a series of safeguarded sites. Although this principally focused on sites released from the Green Belt

to accommodate future needs, this has been a successful policy in managing the supply of housing in Chorley, when there have been periods of housing shortfall.

- 4.41. The CLLP needs to acknowledge the NPPF expecting strategic Policies to consider a vision and strategy to look further ahead, up to 30 years. Given the success of the safeguarded land approach previously, safeguarded sites should be accommodated within this Plan.
- 4.42. Given the heavily constrained Green Belt nature of Central Lancashire, Safeguarded Sites should be covered in an additional evidence base document setting out how needs have been calculated and to include an assessment of non-Green Belt sites, then previously developed Green Belt sites, grey belt sites and thereafter Green Belt options. Once selected, these should be identified and annotated on the Proposals Map and an accompanying Policy developed.
- 4.43. This provides further flexibility in the supply of potential sites and can assist in quickly addressing any shortfall in housing, should identified sites not deliver as expected and/or other triggers within the monitoring requirements are met. It will also cover a position if the Councils adopt this Plan, as they expect, and then fail to progress its replacement immediately as the Government expects.
- 4.44. Without the above alterations, the CLLP, as drafted, is not justified nor positively prepared as it seeks to plan for a significant shortfall in housing in Chorley against the Council's own evidence. It will also be effective in managing and maintaining a supply of housing sites should circumstances require this.

## **Policy HS2: Housing Allocations in Chorley**

- 4.45. The pre-amble to this policy is noted within 4.24, but this does not fully conform with the assessment as detailed in the SHELAA methodology and does not reflect the methodology in the site selection paper. Clarification on the actual approach needs to be provided and it should be consistent across the evidence base and within the CLLP.
- 4.46. Overall, Castle Green fully supports the proposed allocation of the Little Knowley site HS2.10.
- 4.47. However, Castle Green do note that the proposed allocation does not fully reflect the evidence base, and the assessments undertaken for parcel Ref: 19C393a. The evidence clearly assesses a much larger parcel.
- 4.48. The conclusion within the SHELAA at Appendix 4: suitable, available and achievable sites, confirms that parcel Ref: 19C393a [i.e. the entire parcel], should be a proposed allocation ref: HS2.10.
- 4.49. As explained earlier in this report and referencing the Council's own evidence, there are no significant constraints from a landscaping, flooding or heritage perspective which would support the Council's decision to arbitrarily reduce the allocation by around a half compared to the parcel that has been assessed in evidence.
- 4.50. It is also noted that there is a '#' adjacent to the allocation, which appears to denote a need for a wintering bird survey. The Council do not appear to have prepared any ecology evidence to support the need for this. Furthermore, it is noted that the ecological

comments for planning application submitted at the site (Ref:22/00538) accepted that the site is “highly unlikely to have high importance for birds” (**Appendix 4**).

- 4.51. Overall, the allocation is supported, but the evidence directs that the site should be allocated in its entirety to be properly justified, to reflect the Council’s own evidence, and to be positively prepared.

## **Policy HS6: Housing Mix and Density**

- 4.52. In relation to housing mix, Castle Green recognise the need to provide a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. However, it is considered that there is a need to apply a flexible approach to the provision of housing. It should be recognised that the required mix, size, and tenure of homes will differ by location.
- 4.53. This policy also requires all residential schemes to be built to the ‘accessible and adaptable’ standard in Part M4(2) of the Building Regulations. There is no flexibility in this requirement. It also goes on to require 4% of new homes in Chorley to be wheelchair accessible in accordance with Part M4(3a).
- 4.54. The PPG<sup>2</sup> identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type, and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, and the ability to provide step-free access
- 4.55. Castle Green consider that the Council has not yet provided sufficient evidence for this policy to be considered justified or consistent with national policy.
- 4.56. This policy also proposes minimum densities for various locations, of which the relevant density for the Little Knowley location is 27dph. Notwithstanding the arbitrary reduction of the site to identify 150 dwellings in the SHLAA, based on a total site area of 24Ha, it is clear that the wider Little Knowley Farm parcel can deliver significantly in excess of the currently suggested 150 dwelling figure.
- 4.57. Although Castle Green do not have any particular concerns with indicative density figures within a Policy, the figures should only be used as a guide for development and the Council should be flexible in their use to take account of individual site characteristics, the development proposed and also viability. It also needs to be remembered that the evidence base for these figures was developed in 2022, is on a gross basis and does not take into any account the implications biodiversity net gain, or the Councils’ expectation of M4(2) and (3) properties on sites.
- 4.58. This is pertinent as some of the Councils’ proposed allocations, such as Little Knowley, do not appear to adhere to these density requirements.
- 4.59. Overall, this policy should be supported by updated justification.

## **Policy HS7: Affordable housing**

- 4.60. Castle Green supports the need to deliver affordable housing and agree that policies of this nature should be set within a Local Plan or other statutory planning policy. The housebuilding industry also recognise their obligations to assist in meeting such needs.
- 4.61. The evidence sets out an overall gross affordable need of 728 dpa. Given the Council's approach and seeking to deliver a suppressed housing requirement, affordable homes required would be in excess of 50% of the overall requirement.
- 4.62. As such, from the evidence presented, the CLLP will simply not deliver the affordable housing needed.
- 4.63. The NPPF<sup>4</sup> is, clear that the affordable housing policies must not only take account of need but also viability and deliverability.
- 4.64. As noted in the Council's evidence, there are some significant viability challenges set out within section 6 of the Viability Report (February 2025). This includes the Lower Value Brownfield typologies, lower value greenfield typologies and the Preston City Centre typologies are not viable; and that the medium value brownfield typologies, the medium value greenfield typologies, the higher value brownfield typologies and the higher value greenfield typologies are either not viable or marginal, when considered against a set of fully policy compliant appraisals, realistic land values and a 20% profit.
- 4.65. These locations are where a reasonable amount of housing sites are identified, although the exact supply of homes and their trajectory has been requested to be provided for further scrutiny at the Examination.
- 4.66. The Council should be mindful that it is unrealistic to negotiate viability on every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is simply set too high. This will jeopardise future housing delivery and could result in further shortfalls in the overall supply of houses.
- 4.67. In addition to this, Castle Green has serious concerns about the requirement to comply with a Registered Providers Framework included at point 8. The Framework and its requirements have not been provided to allow scrutiny as part of the drafting of the CLLP, nor the process to accepting registered providers onto the Framework and the criteria that they are bound by. There is no evidence to support that this is necessary and a suitable way to support the delivery of affordable homes, as there is need for this and it is simply not justified, it does not comply with the test of soundness in the NPPF
- 4.68. Increasing the housing requirement will help to address the identified need, as expected in the PPG (ID: 2a-O24-20190220). This should be considered against the drafted spatial strategy, seeking to identify and allocate more sites in areas where the viability is greater and should also remove the requirement to work to a registered providers framework, as this would help to increase the level of affordable housing that can be provided.
- 4.69. Castle Green object to criterion 17 of the policy, which states that a 20% supplement – calculated on the total value of the commuted sum, shall be payable to the Council in addition to the commuted sum to cover the cost of administration of an affordable housing

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<sup>4</sup> NPPF December 2023 Paragraph 34

commuted sum. This figure is not justified by evidence – and presents a significant cost which is not considered proportionate to its intended administrative use. It also raises viability concerns, noting our earlier comments in respect of the viability evidence prepared to date.

- 4.70. As drafted this policy is not positively prepared, justified, nor will it be effective in delivering much needed affordable homes.

## Policy EN1: Well Designed Places

- 4.71. Criterion 2 seeks to achieve a green light against all criteria for BHL assessments. It is unreasonable to expect all major developments to achieve a green light against each of the Building for a Healthy Life considerations. Indeed, the Building for a Healthy Life document itself accepts that there may be circumstances where amber lights cannot be avoided. It also acknowledges that a development only needs nine green lights in order to achieve a commendation and to use the Building for a Healthy Life logo. Castle Green therefore recommends that this policy is amended to remove this requirement for all green lights and only seek nine green lights and above in order to better reflect BHL guidance
- 4.72. Criterion 3 expects all proposals to comply with NDSS and also higher water efficiency standards. The nationally described space standards (NDSS) as introduced by Government, are intended to be optional and can only be introduced where there is a clear need, and they retain development viability. It should be a ‘need to have’ and based on evidence.
- 4.73. The PPG<sup>5</sup> identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
  - **Viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
  - **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.
- 4.74. If the Government had expected all properties to be built to NDSS then they would have made these standards mandatory, not optional.
- 4.75. Castle Green is also aware that Building Regulations includes a mandatory standard that all new homes have to meet the requirement of 125 litres/person/day. If the Councils want to

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<sup>5</sup> PPG ID: 56-020-20150327

impose higher standards in policy than the PPG<sup>6</sup> sets out, then evidence is required to establish a clear need and the specific case for the CLLP to justify the inclusion of these optional higher standards. Sufficient evidence has not been provided yet.

- 4.76. Castle Green also considers that criterion 4 of this Policy needs to be removed. There is no definition as to what is considered a 'significant scheme' to require the additional requirements set out in this policy. Masterplans and parameter plans are also irrelevant for detailed planning applications.
- 4.77. The requirement for masterplans and/or design codes needs to be set out in the relevant site allocations, most likely only for those allocations of a strategic nature. It is a largely onerous requirement for proposals, certainly given the scrutiny schemes will be subject to throughout the planning application process.
- 4.78. This policy is not justified and it is not consistent with national policy.

### **Policy EN6: Biodiversity Net Gain**

- 4.79. This policy states that new development will be required to conserve and enhance biodiversity, geodiversity, and landscape features. It states that new development should ensure that biodiversity net gain of no less than 10% is achieved.
- 4.80. Castle Green consider that the Council should adhere to the Government's proposals on biodiversity gain set out in the Environment Act. This legislation and accompanying regulations require developments to achieve a net gain for biodiversity. This nationally required gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. The mandatory national requirement will not be a cap on the aspirations of developers who want to voluntarily go further.
- 4.81. If this policy is going to be included within the CLLP then this is a matter that also needs to be fully considered as part of the site allocation process as it may result in some sites struggling to meet this requirement and not delivering at the density expected, certainly given the age of the density evidence as highlighted previously.
- 4.82. Overall, Castle Green consider that this element of the policy is not necessary and provides unnecessary duplication with national policy.

### **Policy EN8: Trees, Woodlands and Hedgerows**

- 4.83. This policy states that where it has been demonstrated by the applicant that there will be an unavoidable loss of trees and / or hedgerow to facilitate the proposal, then appropriate mitigation via compensatory planting will be required. Tree planting shall be provided on-site at a ratio of 2 trees per 1 loss and loss of hedgerow shall be compensated for by planting of an equal or greater length of hedgerow to the length lost.

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<sup>6</sup> PPG ID: 56-014-20150327

- 4.84. A policy with a direct replacement strategy for trees is not required. Any necessary tree loss needs would be addressed within any BNG assessment required by Policy EN6. Indeed, the loss of trees and hedgerow, certainly poor quality trees and hedgerow, may be more than adequately off set by other forms of landscaping.

Overall, this policy is not justified, positively prepared and may not be consistent with national policy.

## Appendix 2 – Monitoring Framework

- 4.85. The Monitoring Framework provides a selection of Indicators, with their source and a monitoring target to monitor the Plan. In relation to housing this is simply to consider whether housing will be delivered against the trajectory.
- 4.86. Unfortunately, the housing trajectory included within the plan is relatively high level, so it is difficult to understand the individual components of the supply. This needs to be provided in detail in respect of the allocated and non-allocated sites, as they are presented in Appendix 3.
- 4.87. There also needs to be some flexibility within the trajectory of sites to accommodate a lapse rate for the non-delivery of sites, certainly as it is unclear which of the allocated and non-allocated sites within the supply currently benefit from planning permission. This needs to be available to the examination to allow proper scrutiny.
- 4.88. In any case more detail needs to be provided as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified by the Monitoring Framework.
- 4.89. There also needs to be an acknowledgement in the Plan that if this plan is adopted with only 80% of the LHN figures, as suggested by the Councils, there needs to be an immediate review of the Plan to deliver the Government's new LHN figure, which has changed housing need significantly in Central Lancashire, as required by the PPG<sup>7</sup>. The shortfall is around 348p/a, which is in excess of 5,000 homes across a 15-year Plan period.
- 4.90. The monitoring proposed will not be effective and the Plan needs to be reviewed immediately in order to be positively prepared and remain consistent with National Policy.

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<sup>7</sup> Paragraph: O62 Reference ID: 61-062-20190315



## 5. CONCLUSIONS

- 5.1. Pegasus Group has prepared this representation to the Submission Local Plan (Regulation 19) consultation (2025) on behalf of Castle Green.
- 5.2. Pegasus Group has previously prepared representations to the Central Lancashire Local Plan in relation to the site for the previous consultation exercises for the Local Plan. The wider Castle Green land holding was also subject to a previous planning application (ref:22/00538/OUTMAJ), which did not raise any specific technical issues with the site, it was simply withdrawn by Castle Green.
- 5.3. Castle Green welcomes the production of the CLLP and wish to support the Councils in its ongoing preparation.
- 5.4. However, at the outset the CLLP, as prepared, would not comply with the transitional arrangements in the NPPF as its current drafting would not achieve 80% of the current LHN figure.
- 5.5. If modifications are suggested by the Council to address this initial flaw, it is clear that the evidence base will need to be revised to reflect this and more land will need to be identified for residential development. These will be required to ensure a sound local plan can be delivered.
- 5.6. Castle Green support the allocation of site HS2.10, but the evidence upon which it was selected assesses a much wider parcel of land to which there are no significant constraints. As such, the entire site, as assessed in evidence, should be allocated for development.
- 5.7. Castle Green trust that the Councils will find these comments useful as it continues to progress its Local Plan and would be happy to discuss these issues in greater detail in order to assist the Inspector and the Examination in Public.
- 5.8. Castle Green and Pegasus Group would also like to be kept informed of all forthcoming consultations on the Local Plan and any associated documents.



## **Appendix 1 – LCC Committee Report on Samlesbury Enterprise Zone**

**Report to the Cabinet**

Meeting to be held on Thursday, 16 January 2025

**Report of the Director of Growth and Regeneration**

**Samlesbury Enterprise Zone Update and Innovation Hub Proposal**

(Appendix 'A' refers)

<b>Part I</b>	<b>Key Decision:</b> Yes
<b>Corporate Priorities:</b> Economic ambition;	<b>Electoral Division(s):</b> Ribble Valley North East; South Ribble East;
<b>Contact:</b> Chris Dyson, Strategic Development Programme Manager, (01772) 536641, <a href="mailto:chris.dyson@lancashire.gov.uk">chris.dyson@lancashire.gov.uk</a>	

**Summary**

**Purpose of the Report**

To present the proposal to develop an Innovation Hub facility at the internationally significant Samlesbury Enterprise Zone following an allocation of £6m Devolution Capital Funding as part of the broader £20m Lancashire Combined County Authority allocation by government for a series of projects across Lancashire, Blackpool and Blackburn with Darwen.

The Innovation Hub, with current costs estimated at circa £13.2m, will enhance the cyber sector cluster, link employment opportunities to Lancashire residents and businesses working with National Cyber Force and its wider supply-chain.

The report also provides an update on a range of key workstreams facilitating the delivery of the Enterprise Zone including, progress made on the broader site preparation programme, the commercial master planning of Zone A to complement the proposed Innovation Hub, the securing of an updated Local Development Order and of the future marketing strategy.

This is deemed to be a Key Decision and the requirements of the council's Cabinet procedure rules (Standing Order C18, Consideration of Key Decisions) have been complied with.

**Recommendation**

Cabinet is asked to:

- (i) Approve the allocation of the £6m devolution funding towards the proposed Samlesbury Enterprise Zone Innovation Hub facility.
- (ii) Approve an initial allocation of £0.6m from Devolution Capital Funding to



procure and commission the professional team to undertake a detailed design and costing exercise, advise upon the delivery programme and support the county council in assessing risk and a potential mitigation strategy.

- (iii) Authorise the Director of Growth and Regeneration, in consultation with the Director of Law and Governance, the Director of Finance, and the Cabinet Member for Economic Development and Growth, to agree and enter into any legal documentation/contracts associated with the appointment of the professional team and required activities.
- (iv) Approve the project principles as expressed in this report and the provisional allocation of a £7.2m county council contribution towards the current estimated total Innovation Hub capital cost of £13.2m, subject to Full Council approving the proposed capital programme for 2025/26 onwards.
- (v) Approve the additional steps and actions set out in Appendix 'A'.

## Background

1. The Samesbury Enterprise Zone continues to deliver growth, employment and investment opportunities for the broader benefit of Lancashire. Building on this established momentum, the future presence of the National Cyber Force in Lancashire creates a once in a generation opportunity to accelerate economic growth and regeneration. This move is forecast to generate up to 3,000 jobs in the County, as well as causing transformational economic uplift through increased contracts, relocation of leading organisations, and demand for the necessary skills that enable these operations.
2. As evidenced in a recently commissioned economic impact study, the total £5bn National Cyber Force investment over the next decade could leverage a further 1,500 indirect jobs, with salaries in the associated occupations being almost twice the current Lancashire average. A wider impact, which matches these new digital and cyber activities with the traditional strengths of the county's industrial base, has the potential to further transform and modernise Lancashire's local economy.
3. The Lancashire Devolution Deal outlines Lancashire's commitment to deliver innovation-led growth across Lancashire. This includes realising the impact of the National Cyber Force and capturing the investment, business, research and skills expansion of new developments, creating opportunities and new careers for local residents. As part of the Devolution Deal, Lancashire was awarded £20m of capital funding to support projects like the Innovation Hub proposal, which help achieve place-based economic regeneration, innovation-led growth and net zero ambitions.
4. £6m of the £20m capital funding was provisionally allocated to the Innovation Hub project in a previous report to Cabinet in November 2024, to approve the county council acting as the Accountable Body for the £20m devolution funding.



## Options and Proposals

### Innovation Hub

5. The proposed scope for the Innovation Hub facility is circa Gross Internal Area of 27,362 sq. ft. and a Net Internal Area of 20,462 sq. ft., including a mix of open plan, office, events and amenity space. Space will also be flexible and adaptable to future uses. The facility would be located in Zone A of the Enterprise Zone in the broader plot where the Advanced Manufacturing Research Centre North West is located and will complement current and future uses across the Enterprise Zone.
6. The current estimated build cost is circa £13.2m. As part of ongoing due diligence, the projected costs have been reviewed by specialist external cost consultants in liaison with the project team and are based on current information availability, and a design and specification deemed to reflect market demand.
7. It is proposed that the £6m devolution allocation will contribute towards the above with a proposal that the county council allocates the additional estimated balance of £7.2m to facilitate future delivery in years 2025/26 and 2026/27.
8. The approval of the £0.6m professional team budget will initially allow the procurement of a professional team to progress detailed design.
9. Once detailed design is suitably advanced, a procurement exercise will be undertaken to appoint a main contractor. A future procurement report will be taken to Cabinet to seek approval for this procurement exercise, for which the £13.2m capital budget is required to be in place.
10. Further reports will be submitted to Cabinet as decisions are required.
11. The county council is keen to maximise low carbon, sustainability, and environmental accreditations in line with market demand for such accommodation, subject to the business case, resources and viability.
12. In addition to being a multi-functional business premises space, it is anticipated that the proposed Innovation Hub will become a focal point of activity, collaboration and innovation from a range of partners, including the National Cyber Force, universities and other private and public sector bodies of all sizes. It will provide an opportunity for the creation of a nationally and internationally significant location for innovation and research and development in the cyber and other related sectors. In doing so, it will encourage new inward investment into the county.
13. Officers will also consider the procurement of an operator which will be responsible for the facility management and the delivery of innovation support services. This exercise will be conducted alongside the development of the delivery model. It is acknowledged that, to ensure a sustainable and successful facility, the Innovation Hub will need to broaden the sector focus beyond cyber to also target digital, advanced manufacturing/engineering, high tech, robotics, digital and health organisation businesses.



14. In this regard it is intended to build upon Lancashire County Council's ongoing innovation programmes and activity across the county. These include Innovate Lancashire, Lancashire Digital Hub, and the Lancashire Skills Hub, whilst the county council is also a member of the Lancashire Cyber Partnership and the Northwest Cyber Corridor which brings together local and regional partners operating in this field. As such, the Innovation Hub will be well placed to serve as a host for these activities, as well as harnessing wider key sector occupier demand.

### **Alternative Option**

15. Alternative options will be considered as part of the due diligence to be undertaken for the procurement process for the main contractor and operating model operator, as set out in Paragraph 9 above.

### **Other Matters**

#### **Local Development Order**

16. Local Development Order no 3 2024 has now been Adopted by South Ribble and Ribble Valley Borough Councils and will be valid until 2034. This is a major milestone for the Samesbury Enterprise Zone and enables a continuation of the simplified planning process which enables decisions to be made on Local Development Order compliant proposals within 28 days.

#### **Site Preparation Progress Update**

17. The majority of the site wide plot preparation is now complete with the exception of the frontage plot adjacent to the Advanced Manufacturing Research Centre, which is likely to form a later phase, complementary to the wider site development. Tender documents are being prepared for the outstanding foul drainage works and a package of final improvements works is being developed for delivery in 2025.

#### **Commercial Master Planning of Zone A**

18. Anchored by the North West Advanced Manufacturing Facility and the proposed Innovation Hub facility, a refresh of the Zone A commercial masterplan is to be undertaken to prepare a plan that conveys the associated market opportunities for complementary development activity.

### **Marketing**

19. With the majority of the key site works now complete and the Local Development Order approved it is appropriate that the site is re-launched to the market. The site marketing and targeted sector/occupier strategy has therefore been re-visited, and whilst confirmation of the National Cyber Force programme is awaited, a range of interim measures can be implemented including:

- Marketing Signage – marketing boards updated with new development opportunities.



- Website – a temporary "landing" page to replace the existing Samlesbury Enterprise Zone information.
- Enquiry management process – this is being reviewed to ensure that a comprehensive system is in place given the new expanded sector interests, also recognising regional, national and international enquiries.
- A comprehensive communications strategy will form part of the above, to complement the marketing strategy and promote the site in the wider marketplace.

## **Consultations**

20. Ribble Valley Borough Council and South Ribble Borough Council will both be consulted throughout the planning process as the Samlesbury Enterprise Zone lies across the boundary of the two councils.

## **Context and Implications**

### **Legal (including Human Rights)**

21. The Council has the power to enter into the arrangements proposed under section 1 of the Localism Act 2011, and section 111 of the Local Government Act 1972.

22. Legal Services is providing support in respect of the grant funding agreement to secure the devolution monies and will also provide commercial, procurement and property support and advice in respect of any contractual arrangements required to protect the interests of the county council in the delivery and operation of the Innovation Hub.

### **Financial**

23. The investment of £7.2m will have a revenue implication of £0.684k per year over a 20-year period if funded from borrowing. The operating model which will be subject to review and a further report to Cabinet in Spring 2025 following market engagement and assessment of options, may be able to repay the cost of borrowing but may also need revenue support in the early years depending on the operating model chosen and the risk appetite of the council at that time.

24. The professional team will be funded from the devolution grant monies and it is anticipated that Council funding will not be required before the further report in the Spring which will include a full financial position of both the capital build and the proposed operating model the facility will be run under.

### **Equality and Diversity**

25. It is anticipated that the Innovation Hub and associated activity should have a positive impact on groups with protected characteristics as set out in the Equality Act 2010 and contribute positively to the Public Sector Equality Duty's three general aims. It would be expected to contribute most positively to the general aim of advancing equality of opportunity and may be of particular significance for



younger and working age people (age protected characteristic group). However, the potential equality impact should be reviewed as this proposal develops.

## Risk Management

26. Identified risks are as follows:

- Risk of losing the devolution capital funding allocation in the event that project proposals and delivery are not accelerated.
- Financial risk of progressing detailed design, and incurring cost, ahead of knowing fixed capital costs and the full extent of demand for the facility.
- Progressing the capital element of the project in advance of all details being confirmed in respect of the operating model and scheme viability, which will determine revenue requirements and long-term risk.

## List of Background Papers

Paper	Date	Contact/Tel
None		

## Part II Reason

27. Exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972. Appendix 'A' contains information relating to the financial or business affairs of any particular person (including the authority holding that information). It is considered that in all the circumstances of the case the public interest in maintaining the exemption outweighs the public interest in disclosing the information.





## Appendix 2 – Level 2 SFRA, Little Knowley

# Central Lancashire Level 2 Strategic Flood Risk Assessment - Site 19C393a

Final

February 2025

Prepared for:



[www.jbaconsulting.com](http://www.jbaconsulting.com)

## Document Status

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# Contract

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JBA Project Code	2023s1344

This report describes work commissioned by Preston City Council, on behalf of the Central Lancashire Local Plan Team, by an instruction dated 19 August 2024. The Client's representative for the contract was Carolyn Williams of Preston City Council. Freya Nation of JBA Consulting carried out this work.

## Purpose and Disclaimer

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The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by JBA has not been independently verified by JBA, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by JBA in providing its services are outlined in this Report. The work described in this Report was undertaken between 19 August 2024 and 14 February 2025 and is based on the conditions encountered and the information available during the said period. The scope of this Report and the services are accordingly factually limited by these circumstances.

Where assessments of works or costs identified in this Report are made, such assessments are based upon the information available at the time and where appropriate are subject to further investigations or information which may become available.

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### Acknowledgements

We would like to thank the Environment Agency for their assistance with this work

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# Contents

<b>1</b>	<b>Background</b>	<b>1</b>
	1.1 Site 19C393a	1
<b>2</b>	<b>Flood risk from rivers</b>	<b>4</b>
	2.1 Existing risk	4
	2.2 Impacts from climate change	6
	2.3 Flood risk management	8
	2.4 Residual risk	10
	2.5 Historic flood incidents	12
	2.6 Flood warning and access and escape routes	12
	2.7 Observations, mitigation options and site suitability - fluvial	13
<b>3</b>	<b>Flood risk from surface water</b>	<b>15</b>
	3.1 Existing risk	15
	3.2 Impacts from climate change	17
	3.3 Observations, mitigation options and site suitability - surface water	19
<b>4</b>	<b>Risk from groundwater</b>	<b>21</b>
<b>5</b>	<b>Overall site assessment</b>	<b>23</b>
	5.1 Can part b) of the exception test be passed?	23
	5.2 Recommendation summary	23
	5.3 FRA requirements and further work	<b>Error</b>
	<b>r! Bookmark not defined.</b>	
<b>6</b>	<b>Licencing</b>	<b>25</b>

## List of Figures

Figure 1-1: Existing site location boundary	2
Figure 1-2: Topography	3
Figure 2-1: Existing risk from rivers to the site	5
Figure 2-2: Flood depths for 1% AEP undefended flood event	6
Figure 2-3: Flood depths for 1% AEP undefended flood event +47% (higher central climate change allowance)	7
Figure 2-4: Flood hazard for 1% AEP undefended flood event +47% (higher central climate change allowance)	8
Figure 2-5: Natural Flood Management (NFM) potential mapping	10
Figure 2-6: Potential blockage location	11
Figure 2-7: Flood risk from reservoirs	12
Figure 2-8: EA Flood Warning Areas	13
Figure 3-1: Medium risk event surface water flood depths (Risk of Flooding from Surface Water map)	16
Figure 3-2: Medium risk event surface water flood hazard (Risk of Flooding from Surface Water map)	17
Figure 3-3: Medium risk event surface water flood depths plus 45% climate change (based on Risk of Flooding from Surface Water map)	18
Figure 3-4: Medium risk event surface water flood hazards plus 45% climate change (based on Risk of Flooding from Surface Water map)	19
Figure 4-1: JBA 5m Groundwater Emergence Map	21

## List of Tables

Table 2-1: Existing fluvial flood risk	4
Table 2-2: Modelled climate change allowances for peak river flows for the Douglas Management Catchment	6
Table 3-1: Existing surface water flood risk based on the RoFSW map	15
Table 3-2: Modelled climate change allowances for rainfall for the Douglas management catchment	17
Table 4-1: Groundwater Flood Hazard Classification	22

## 127 Background

This is a Level 2 Strategic Flood Risk Assessment (SFRA) site screening report for the Central Lancashire Local Plan Site 19C393a. The content of this Level 2 SFRA site screening report assumes the reader has already consulted the 'Central Lancashire Level 1 SFRA' (2025) and read the 'Central Lancashire Level 2 SFRA Main Report' (2025) and is therefore familiar with the terminology used in this report.

### 127.1 Site 19C393a

- Location: Little Knowley Farm
- Existing site use: Agriculture
- Existing site use vulnerability: Less vulnerable
- Proposed site use: Housing
- Proposed site use vulnerability: More vulnerable
- Site area: 24.5 hectares
- Proposed development impermeable area: 20.8 hectares (assumed 85% impermeable area)
- EA model: Black Brook 2011
- Watercourse: Black Brook
- Summary of requirements from scoping stage:
  - Level 1 SFRA recommendation was for withdrawal from allocation or more detailed assessment through Level 2 SFRA
  - Assessment of modelled fluvial flood depths and hazards
  - Assessment of surface water flood depths and hazards
  - Assessment of all other sources of flood risk

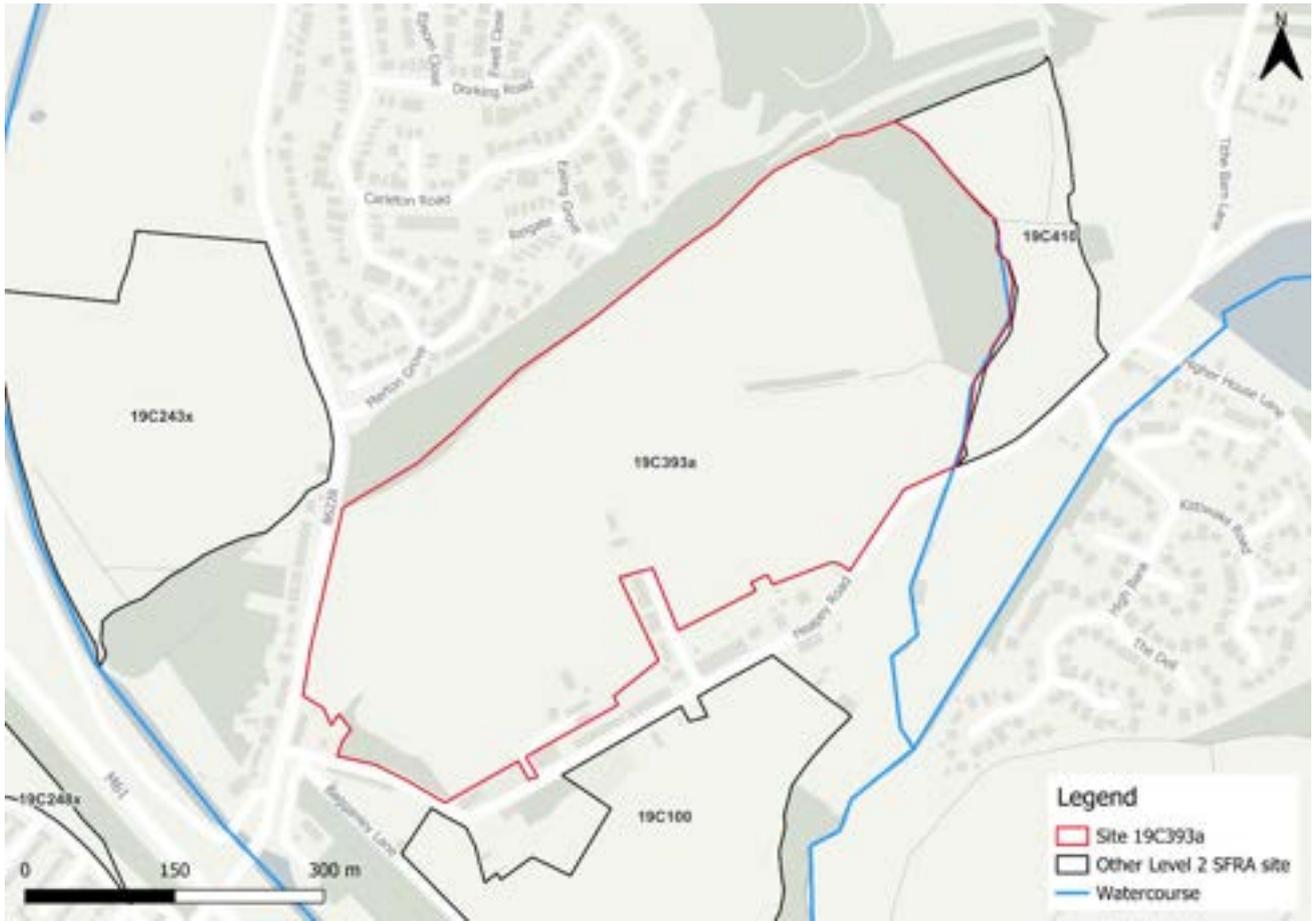


Figure 127-1: Existing site location boundary

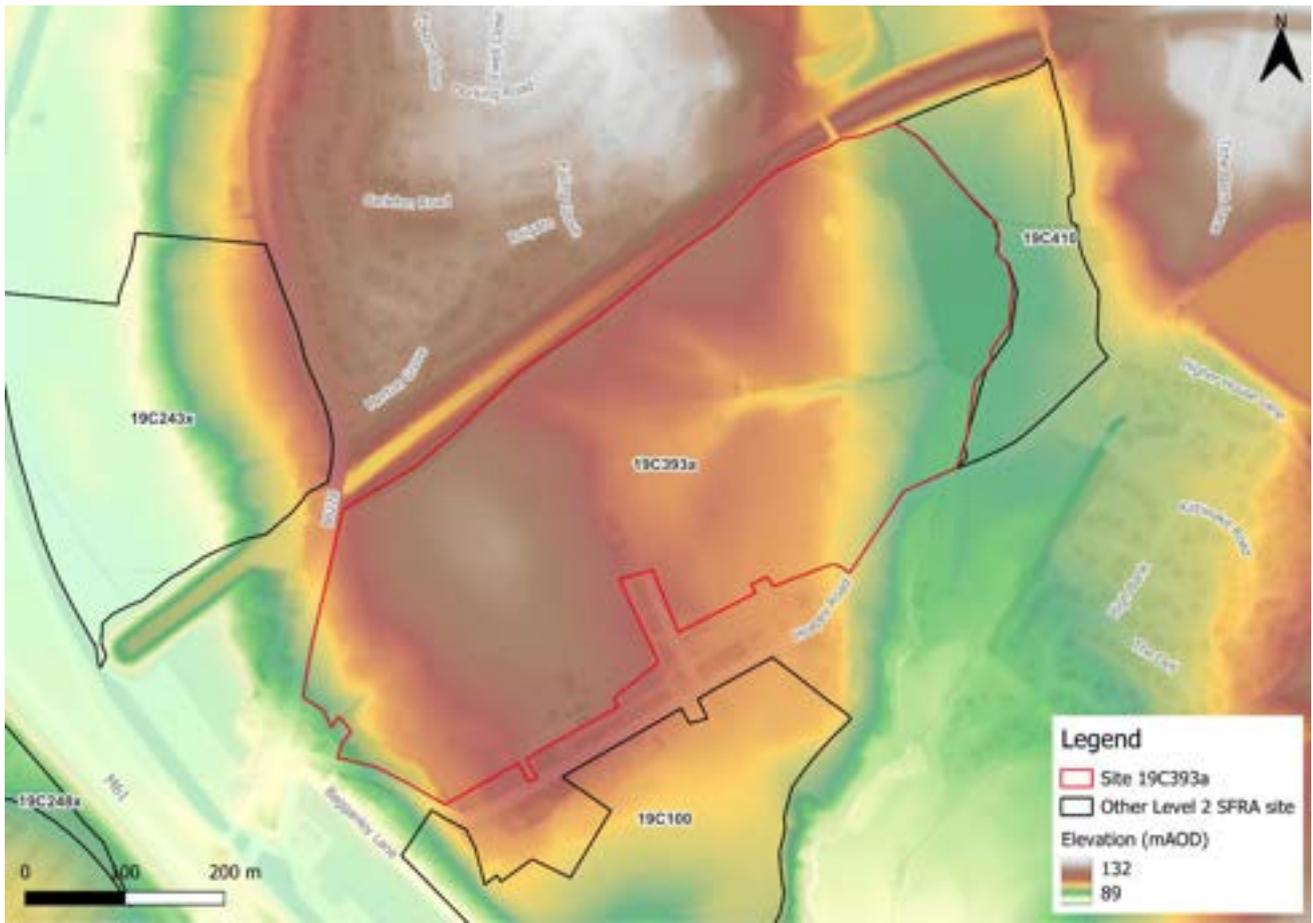


Figure 127-2: Topography

# 128 Flood risk from rivers

## 128.1 Existing risk

### 128.1.1 Flood Map for Planning and functional floodplain

Based on the EA's Flood Map for Planning and Flood Zone 3b (functional floodplain) as updated in the Central Lancashire Level 1 SFRA (2025), the percentage areas of the site within each fluvial flood zone are stated in Table 2-1 and can be viewed on Figure 2-1. The Flood Map for Planning does not consider flood defence infrastructure (Section 2.3) or the impacts of climate change (Section 2.2).

Functional floodplain is present along a reach of Black Brook which flows along the eastern boundary of the site. This reach of Black Brook is not explicitly represented in the 2011 model and instead has been represented as a hydrologic inflow into the main Black Brook channel. The functional floodplain in this location is based on an 8m buffer either side of the OS Open Rivers Watercourse Link dataset. It is recognised that this is an approximation. There should be no development within the functional floodplain. Policy relating to Flood Zone 3b applies to the watercourse with an 8m buffer either side, and not the mapping where they are different. The site is also located partially within Flood Zone 2 along the eastern boundary of the site.

Table 128-1: Existing fluvial flood risk

Flood Zone 1 (%)	Flood Zone 2 (%)	Flood Zone 3a (%)	Flood Zone 3b (%)
95	4	0	1

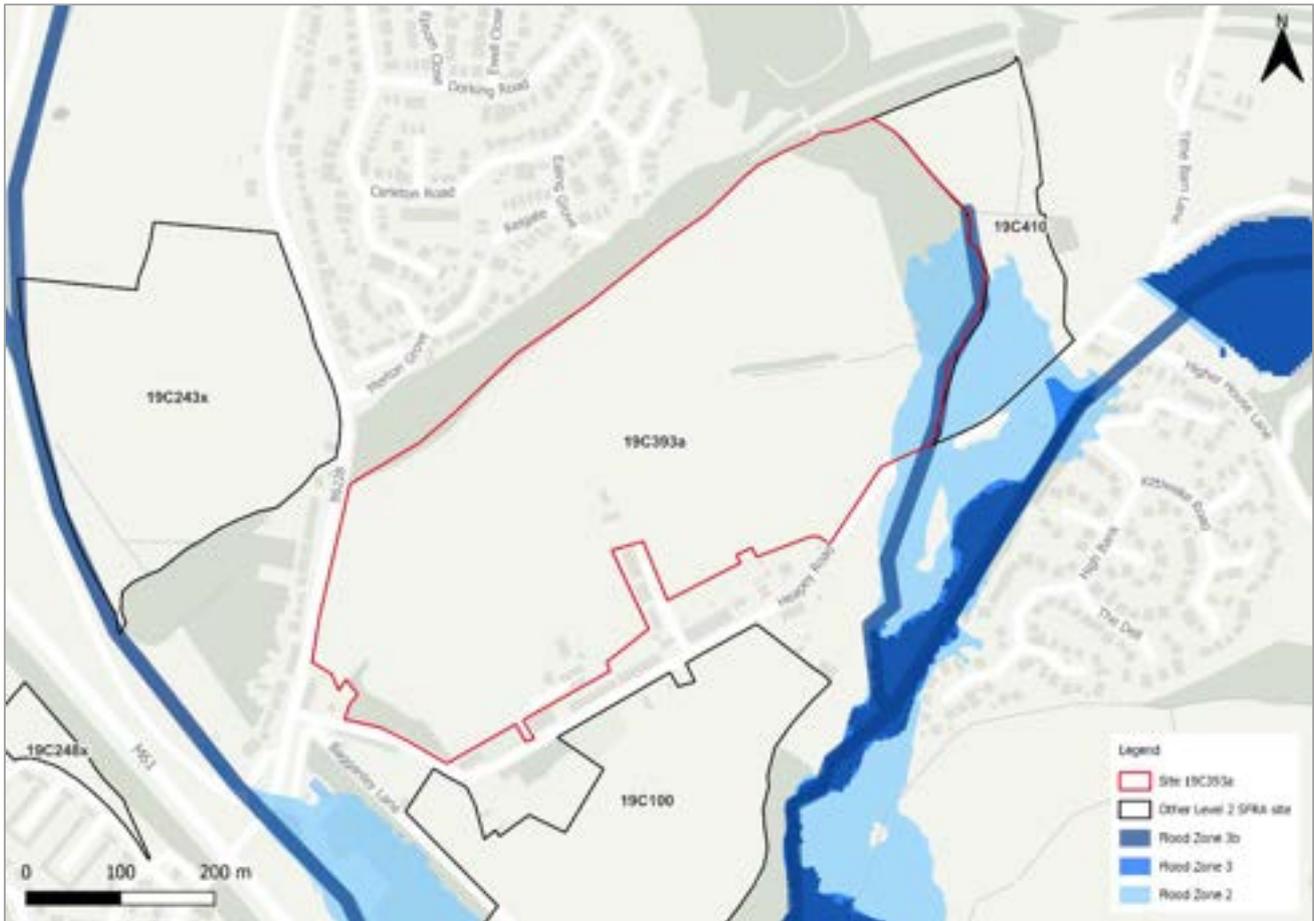


Figure 128-1: Existing risk from rivers to the site

### 128.1.2 Black Brook 2011 model outputs

Figure 2-2 shows the modelled flood depths for the 1% AEP undefended event which is the event Flood Zone 3 of the Flood Map for Planning is based on. There is no modelled flood risk to the site in the 1% AEP undefended event. However, the reach of Black Brook adjacent to the site is not explicitly represented in the model and instead has been represented as a hydrologic inflow into the main channel. Modelling this reach of the Black Brook should be considered as part of a site-specific FRA, as well as/instead of a Level 2 SFRA update.



Figure 128-2: Flood depths for 1% AEP undefended flood event

### 128.2 Impacts from climate change

The impacts of climate change on flood risk from the Black Brook have been modelled without flood defence infrastructure in place. This allows for direct comparison with the existing risk of the Flood Map for Planning.

With consideration of the EA's SFRA guidance, the latest climate change allowances have been modelled as shown in Table 2-2.

Table 128-2: Modelled climate change allowances for peak river flows for the Douglas Management Catchment

Return period	Central allowance 2080s	Higher central allowance 2080s
3.3% (functional floodplain)	35%	47%
1%	35%	47%

In the climate change event, the site is modelled to be at risk along the eastern boundary of the site. Figure 128-3 shows the modelled flood depths for the 1% AEP undefended event plus 47% climate change allowance. Greatest depths within the site are modelled to be between 0.9 and 1.2 m. Figure 2-5 shows the modelled flood hazard rating during the 1%

AEP undefended flood event +47% climate change allowance. Flood hazard within the site is largely modelled to be categorised as 'Danger for some'.

However, the reach of Black Brook adjacent to the site is not explicitly represented in the model, and instead has been represented as a hydrologic inflow into the main channel. Modelling this reach of the Black Brook should be considered as part of a site-specific FRA, as well as/instead of a Level 2 SFRA update.



Figure 128-3: Flood depths for 1% AEP undefended flood event +47% (higher central climate change allowance)

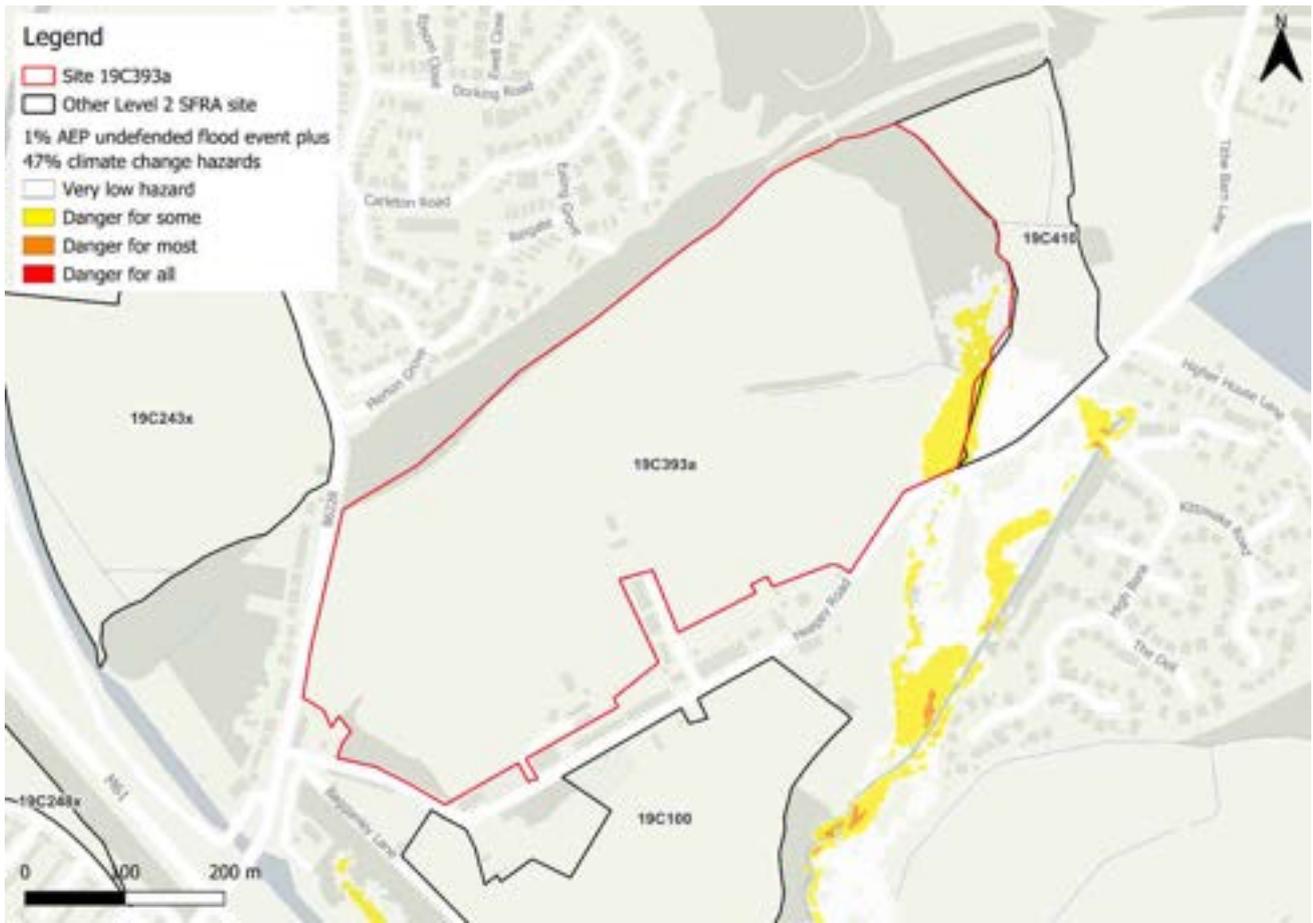


Figure 128-4: Flood hazard<sup>78</sup> for 1% AEP undefended flood event +47% (higher central climate change allowance)

### 128.3 Flood risk management

The site does not benefit from any formal engineered flood defences, according to the EA's spatial flood defences dataset.

#### 128.3.1 Cumulative impacts

A cumulative impact assessment was completed through the Central Lancashire Level 1 SFRA (2025), which aimed to identify catchments sensitive to the cumulative impact of development. Site 19C393a is located within two catchments, namely; Lostock US Farington Weir and Yarrow US Big Lodge Water. Lostock US Farington Weir is ranked as a medium sensitivity catchment and Yarrow US Big Lodge Water is ranked as a low sensitivity catchment. Planning policy considerations for sites at medium and low sensitivity to the cumulative impacts of development that apply to this site include:

<sup>78</sup> Fluvial hazard ratings based on Table 4 of the SUPPLEMENTARY NOTE ON FLOOD HAZARD RATINGS AND THRESHOLDS FOR DEVELOPMENT PLANNING AND CONTROL PURPOSE – Clarification of the Table 13.1 of FD2320/TR2 and Figure 3.2 of FD2321/TR1. May 2008.

- Incorporate SuDS and provide details of adoption, ongoing maintenance, and management, in line with the Lancashire SuDS Guidance<sup>79</sup>.
- Developments should be incentivised to provide wider betterment by being requested to demonstrate in site-specific FRAs and Surface Water Drainage Strategies what measures can be put in place to contribute to a reduction in flood risk downstream.
- Developments are to aim to achieve greenfield runoff rates and volumes in their post-development state.
- Surface Water Management Plans should be developed as required.

The full list of planning policy suggestions can be found in Appendix G of the Level 1 SFRA.

### 128.3.2 Working with Natural Processes

The EA's Working with Natural Processes (WwNP) dataset has been interrogated to identify opportunities for Natural Flood Management (NFM) to reduce flood risk to the site and surrounding areas. Within the site there are opportunities for floodplain, riparian and wider catchment tree planting. Tree planting can intercept, slow, store and filter water, reducing runoff downstream. There is also the potential for runoff attenuation features to reduce the volume of flooding downstream. These areas are shown in Figure 128-5.

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<sup>79</sup> [Lancashire SuDS Guidance](#)

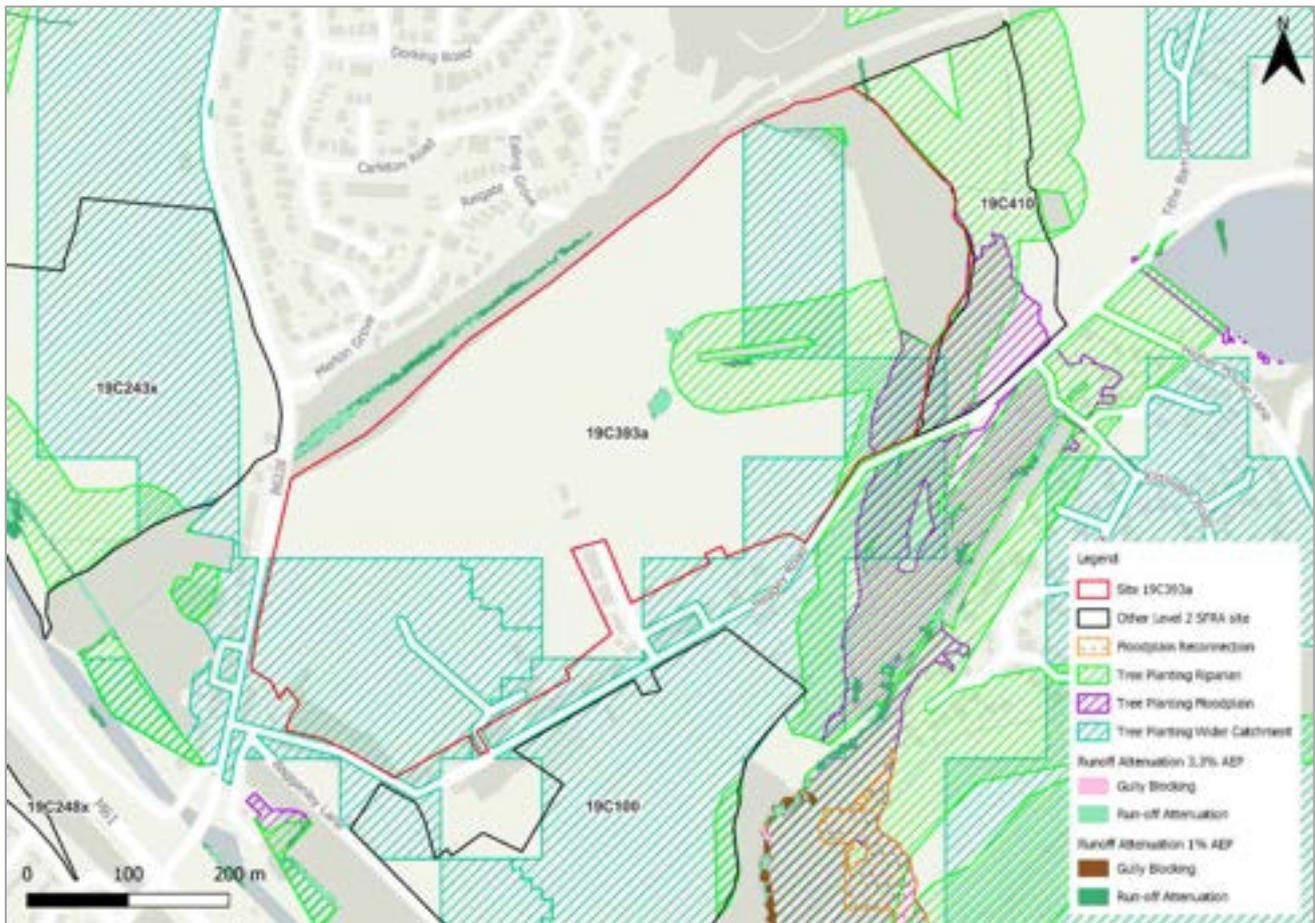


Figure 128-5: Natural Flood Management (NFM) potential mapping

#### 128.4 Residual risk

Although a site may be afforded some protection from defences and / or drainage infrastructure, there is always a residual risk of flooding from asset failure i.e. breaching / overtopping of flood defences, blockages of culverts or bridge openings.

Residual risk at this site comes from possible blockage of the structure beneath Heapey Road at the southeastern corner of the site (Figure 2-7). This section of the watercourse is not included in the 2011 Black Brook model, therefore the impact of a blockage at this location could not be assessed. It is recommended that the site-specific FRA should consider the impact of a blockage of this culverts on residual flood risk to the site.

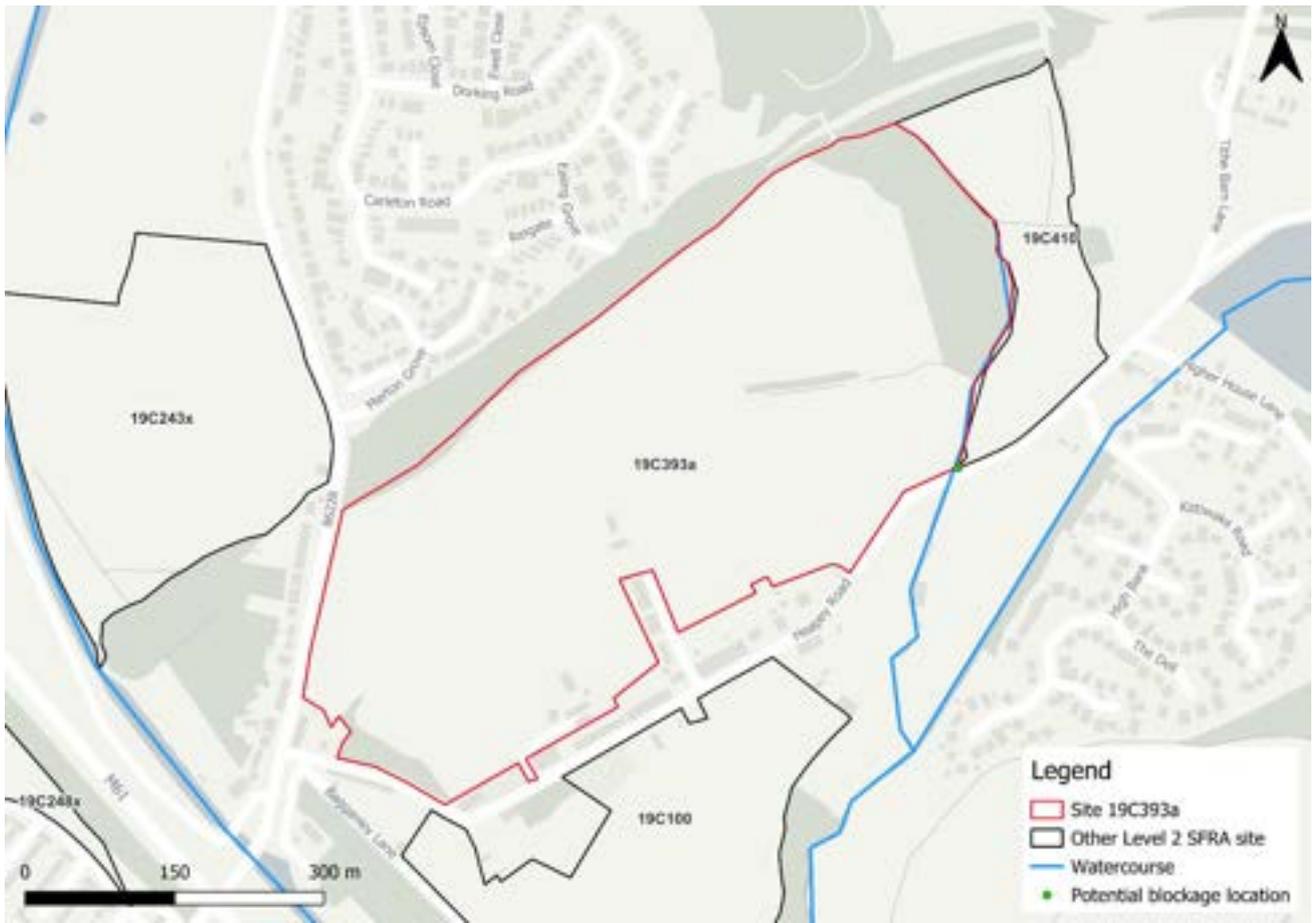


Figure 128-6: Potential blockage location

#### 128.4.1 Flood risk from reservoirs

The EA's Reservoir Flood Maps (RFM) (2021) show where water may go in the unlikely event of a reservoir or dam failure.

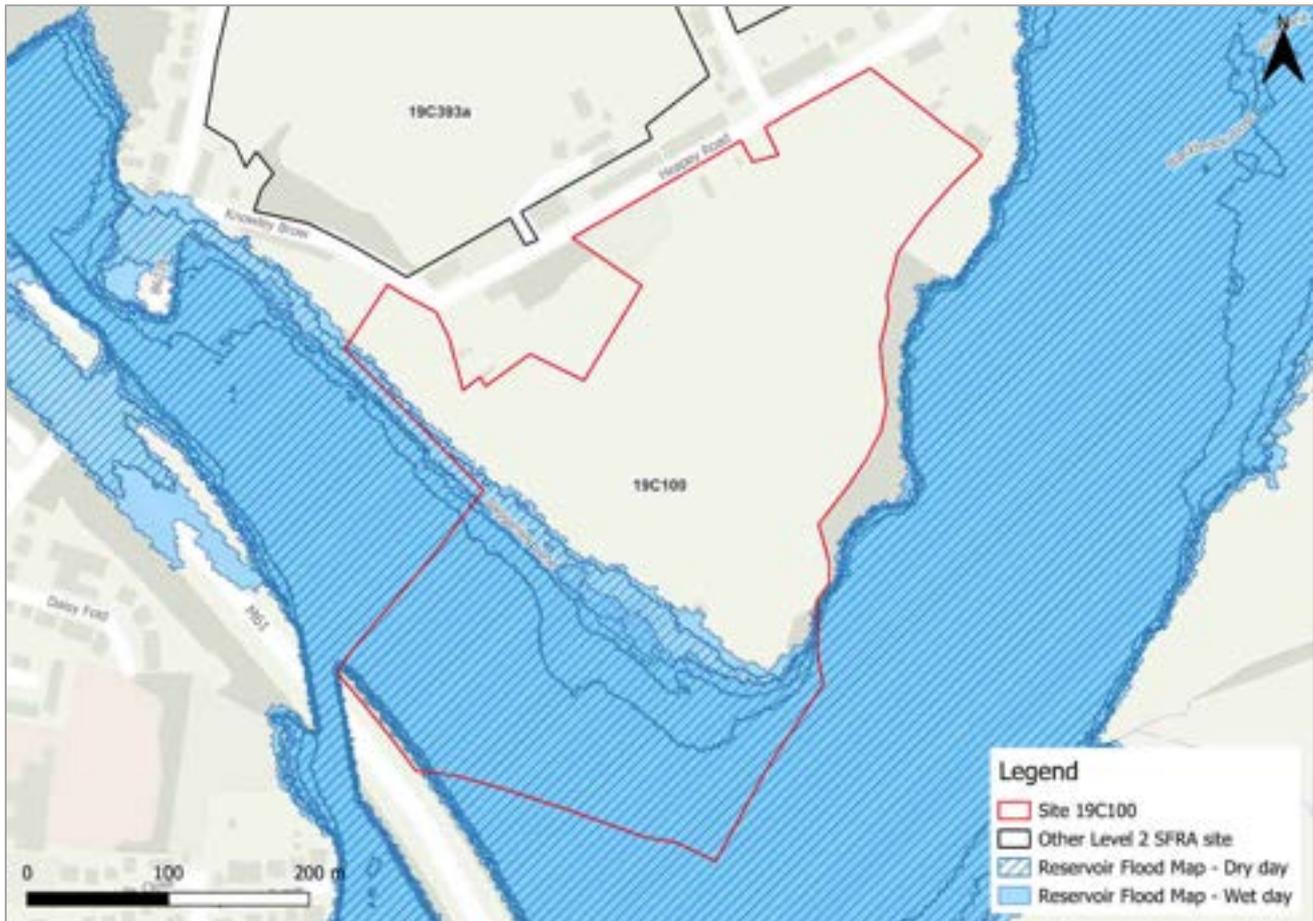


Figure 2-9 shows the RFM in a 'dry day' and 'wet day' scenario. A 'dry day' scenario assumes that the water level in the reservoir is the same as the spillway level or the underside of the roof for a service reservoir and the watercourses upstream and downstream of the reservoir are at a normal level. A 'wet day' scenario assumes a worst-case scenario where a reservoir releases water held on a 'wet day' when local rivers have already overflowed their banks.

The site is potentially at risk from Anglezarke, Heapey No.1, Heapey No.2, Heapey No.3, High Bullough and Yarrow reservoirs, all of which are located within Lancashire. Three of these reservoirs are operated by United Utilities and three are operated by Wigan & District Angling Association.

The EA's SFRA guidance states that where a proposed development site is at flood risk from a reservoir, then an assessment into whether the reservoir design or maintenance schedule needs improving should be carried out. Expert advice may be required from an all-reservoirs panel engineer. At the FRA stage, United Utilities and Wigan & District Angling Association, should be contacted to ascertain whether the proposed development could affect the reservoir's risk designation, its design category or how it is operated. The council, as category 1 responders, can access more detailed information about reservoir risk and reservoir owners using the [Resilience Direct](#) system.

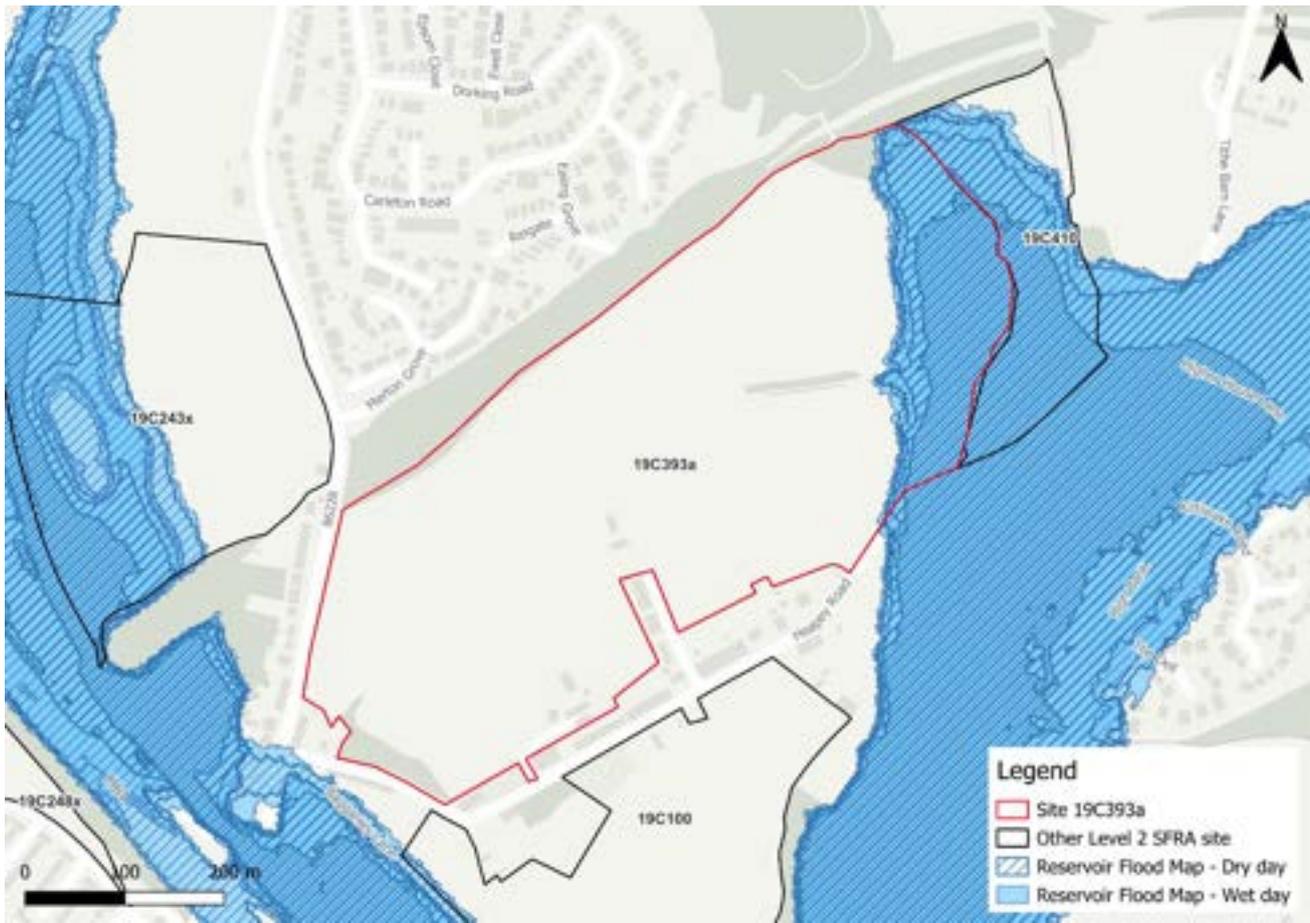


Figure 128-7: Flood risk from reservoirs

### 128.5 Historic flood incidents

The EA's Historic Flood Map (HFM) and Recorded Flood Outlines (RFO) datasets have been considered. There are no recorded historic flood incidents within the vicinity of the site.

### 128.6 Flood warning and access and escape routes

The EA operates a Flood Warning Service for properties located within a Flood Warning Area (FWA) for when a flood event is expected to occur. Site 19393a is located within FWA, namely; 012FWFL59B - Black Brook at Chorley, Heapey Road to Cowling.

Flood alerts may be issued before a flood warning for properties located within a Flood Alert Area (FAA) to provide advance notice of the possibility of flooding. A flood alert may be issued when there is less confidence that flooding will occur in a FWA. The site is also located within a FAA, namely; 012WAFly - River Lostock and River Yarrow.

Based on available information, safe access and escape routes could likely be achieved during a flood event via multiple locations surrounding the site.

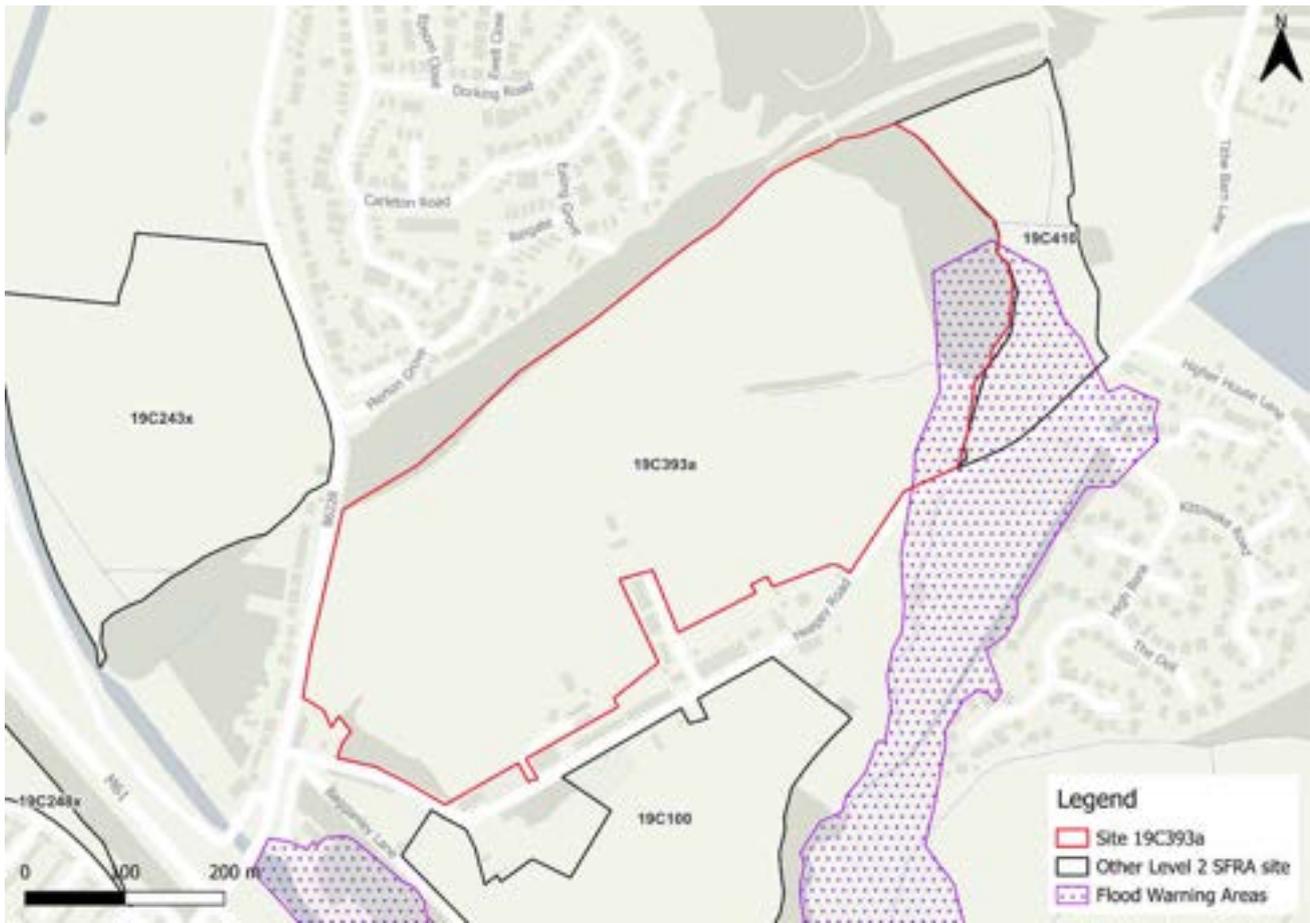


Figure 128-8: EA Flood Warning Areas

### 128.7 Observations, mitigation options and site suitability - fluvial

- The site is modelled to be within the functional floodplain along a reach of Black Brook. Development is not permitted within the functional floodplain. However, the functional floodplain in this area is conservatively based on an 8m buffer either side of the OS Open Rivers Watercourse link dataset.
- The reach of the Black Brook which flows adjacent to the site is not explicitly modelled in the 2011 Black Brook model. Detailed modelling of this reach should be considered as part of a site-specific FRA, as well as/instead of a Level 2 SFRA update.
- Ordinary Watercourse Flood Defence Consent (OWFDC) may be required if development is planned within 8m of the riverbank. The LLFA can advise on whether this would be required. If feasible, this area would be used as a green / blue corridor which can provide ecological, social and amenity value.
- The impacts of climate change on flood risk from the Black Brook have been modelled without flood defence infrastructure in place using climate change allowances for peak river flows for the Douglas Management Catchment. Based on this approach, fluvial risk is modelled to be significantly greater in extent to the present day 1% undefended event outputs, covering the eastern boundary of the site.

- More vulnerable development should be directed away from the area of the site within Flood Zone 3a plus climate change. However, as mentioned previously, the reach of the Black Brook which flows adjacent to the site is not explicitly modelled in the 2011 Black Brook model.
- The site is at potential residual risk from a possible blockage of the culvert beneath Heapey Road downstream of the site. It is recommended that the site-specific FRA should consider the impact of a blockage of this culvert on residual flood risk to the site.
- Safe access and escape should be possible via multiple locations around the site, based on available information.
- Given the potential reservoir risk to the site, developers should consider<sup>80</sup>:
  - Whether additional modelling is required to understand the flood risk from the reservoir, referring to the specification for the reservoir flood maps as a starting point
  - Whether the development may have an impact on the reservoir or reservoir owner
  - Referring to the Central Lancashire Level 1 SFRA for information on reservoir risk and recommendations for how to address it
  - Contacting the LPA for pre-application advice
  - Contacting the LPA to understand the need to consult with their emergency planning team and with the reservoir owner
- Were development of this site to proceed, given the proximity of this site to neighbouring site 19C410, and the fact that Black Brook borders both sites, it would be prudent to formulate a strategy to develop these sites in tandem and for consultation between each developer to take place to ensure a joined-up approach for sustainable development is in place.

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80 [Reservoir flood maps: when and how to use them | Environment Agency | 2021](#)

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# 129 Flood risk from surface water

## 129.1 Existing risk

Based on the EA's national scale Risk of Flooding from Surface Water (RoFSW) map surface water flood risk to the site is predominantly very low. Approximately 1% of the site is within the high risk surface water zone. A further 1% is at medium surface water risk and a further 3% is at low surface water risk, as shown in Table 129-1.

In the high risk event, surface water risk is confined to two small areas of ponding within topographic low spots in the centre of the site. In the medium risk event, the two areas of ponding are greater in extent and there is an additional surface water flow path in the ditch within the east of the site. In the low risk event, the flow path along the ditch within the eastern half of the site develops and joins the larger flow path along Black Brook. Greatest flood depths in the medium risk event are between 0.6 m and 0.9 m (Figure 3-1), with some areas of hazard categorised as significant (Figure 3-2).

Table 129-1: Existing surface water flood risk based on the RoFSW map

Very low risk (%)	Low risk (%)	Medium risk (%)	High risk (%)
95	3	1	1

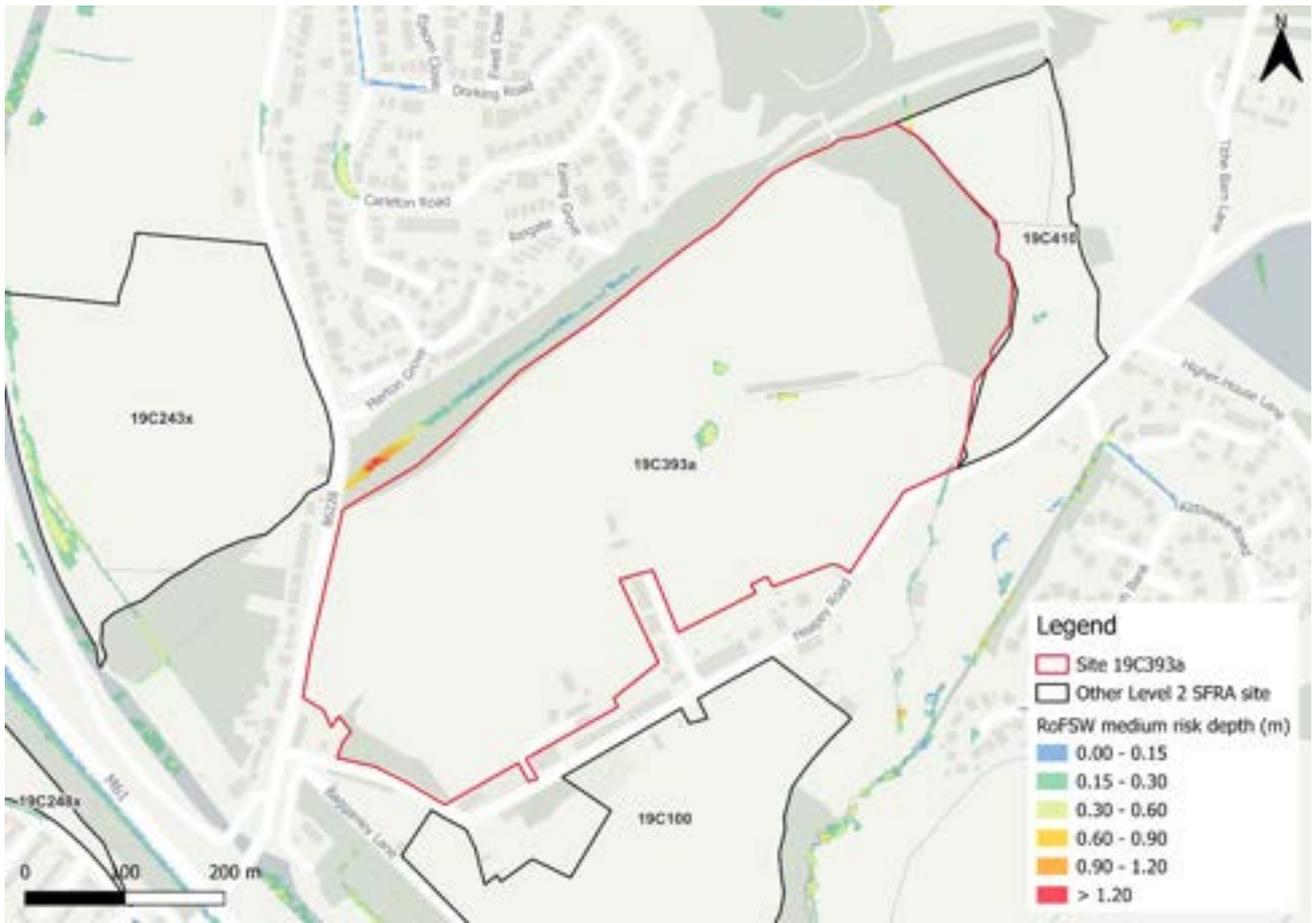


Figure 129-1: Medium risk event surface water flood depths (Risk of Flooding from Surface Water map)

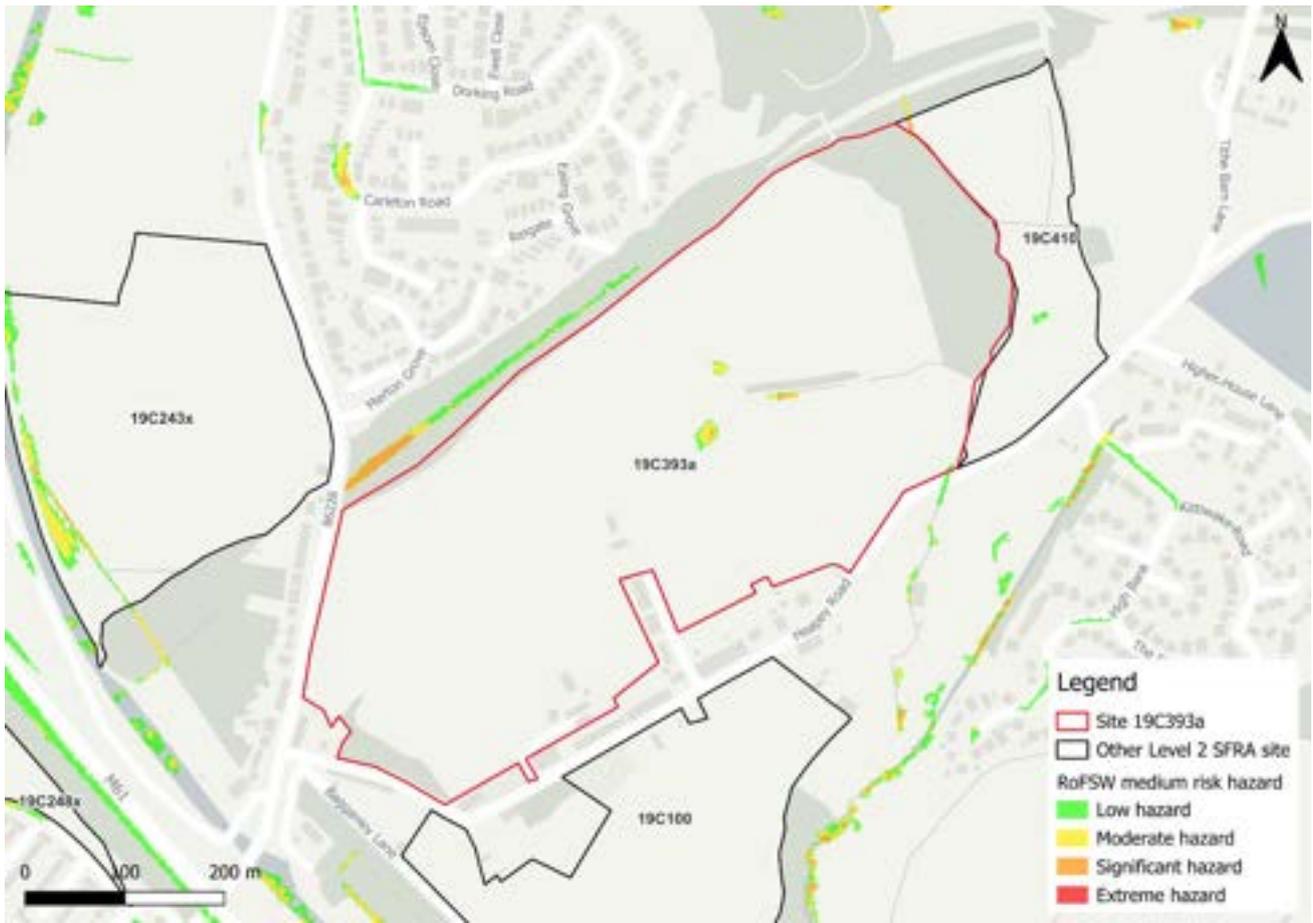


Figure 129-2: Medium risk event surface water flood hazard<sup>81</sup> (Risk of Flooding from Surface Water map)

### 129.2 Impacts from climate change

The impact of climate change on surface water flood risk has been modelled. This allows for direct comparison with the RoFSW map. With consideration of the EA’s SFRA guidance, the latest climate change allowances have been modelled as shown in Table 3-2.

Table 129-2: Modelled climate change allowances for rainfall for the Douglas management catchment

Return period	Central allowance 2070s	Upper end allowance 2070s
3.3% (high risk)	30%	40%
1% (medium risk)	35%	45%

Figure 3-3 shows the high risk surface water flood depths plus 40% climate change. Risk is modelled to be greater in extent than the present day high risk surface water event, similar to the present day medium risk event. The area of ponding within the southwest of the site

<sup>81</sup> Based on Section 7.5 Hazard rating. What is the Risk of Flooding from Surface Water map? Report version 2.0. April 2019. Environment Agency

is greater in extent and depth, and an additional surface water flow path emerges through the centre of the site. Maximum flood depths are modelled to be between 0.6 m and 0.9 m, with some areas of significant hazard (Figure 3-4).

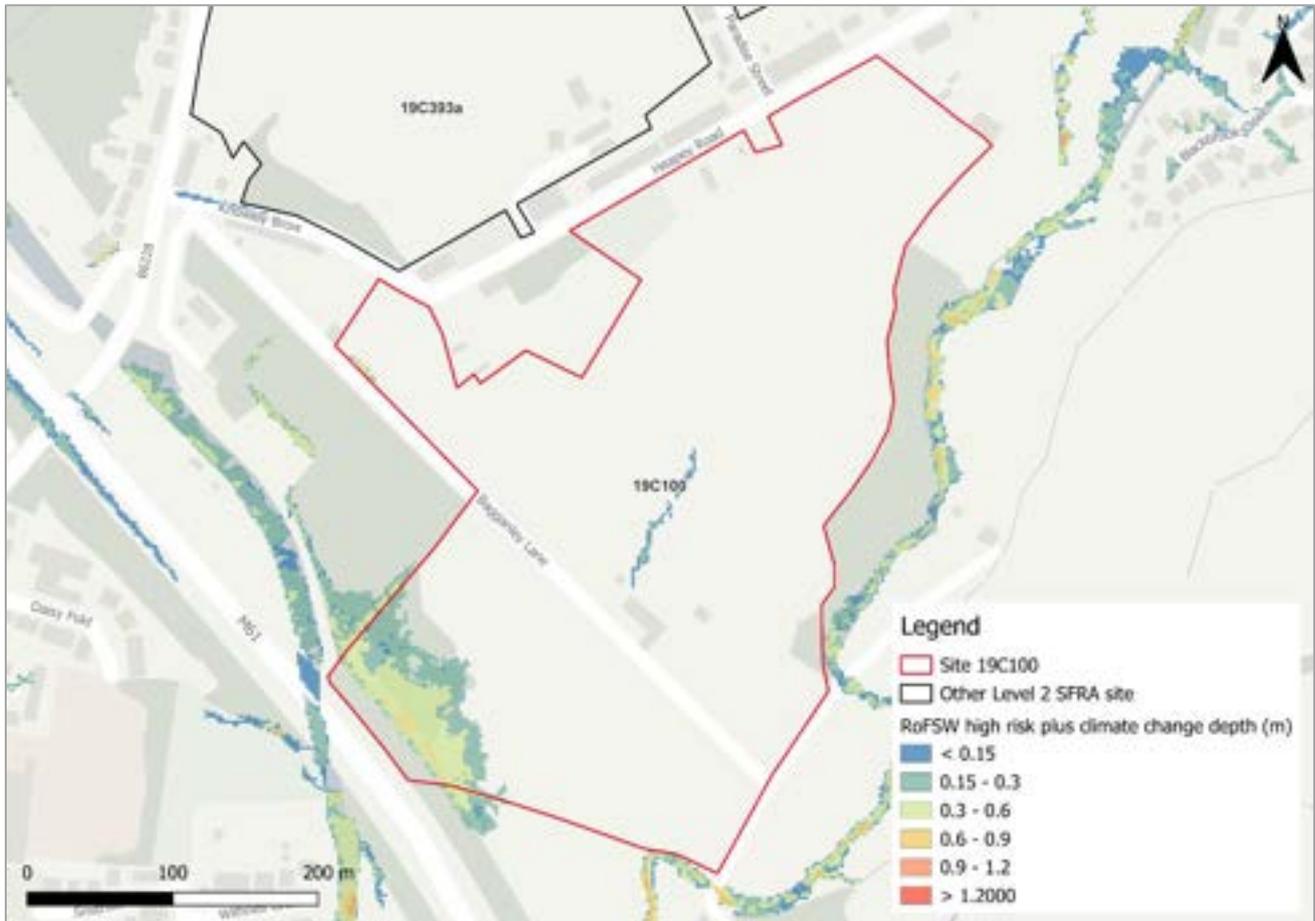


Figure 3-3 shows the flood depths during the medium risk surface water flood event plus an allowance for climate change. Risk is modelled to be greater in extent than the present day medium risk surface water event, similar to the present day low risk event. The two areas of ponding within the centre of the site extend to join the flow path along the drainage ditch within the east of the site. Maximum flood depths are modelled to be between 0.9 m and 1.2 m and with areas of hazard categorised as significant (Figure 3-4). Safe access and escape should remain achievable via multiple locations around the site.

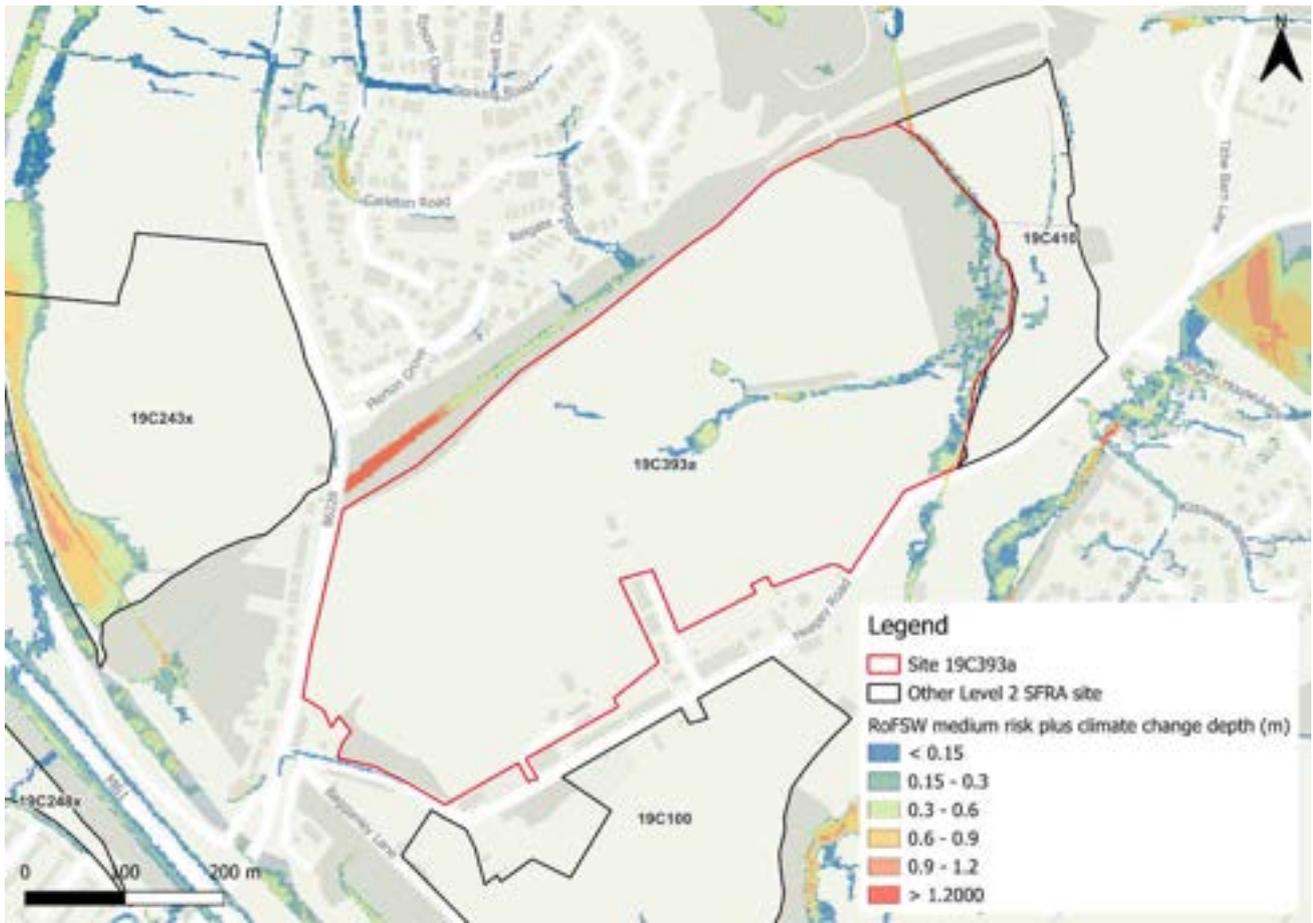


Figure 129-3: Medium risk event surface water flood depths plus 45% climate change (based on Risk of Flooding from Surface Water map)

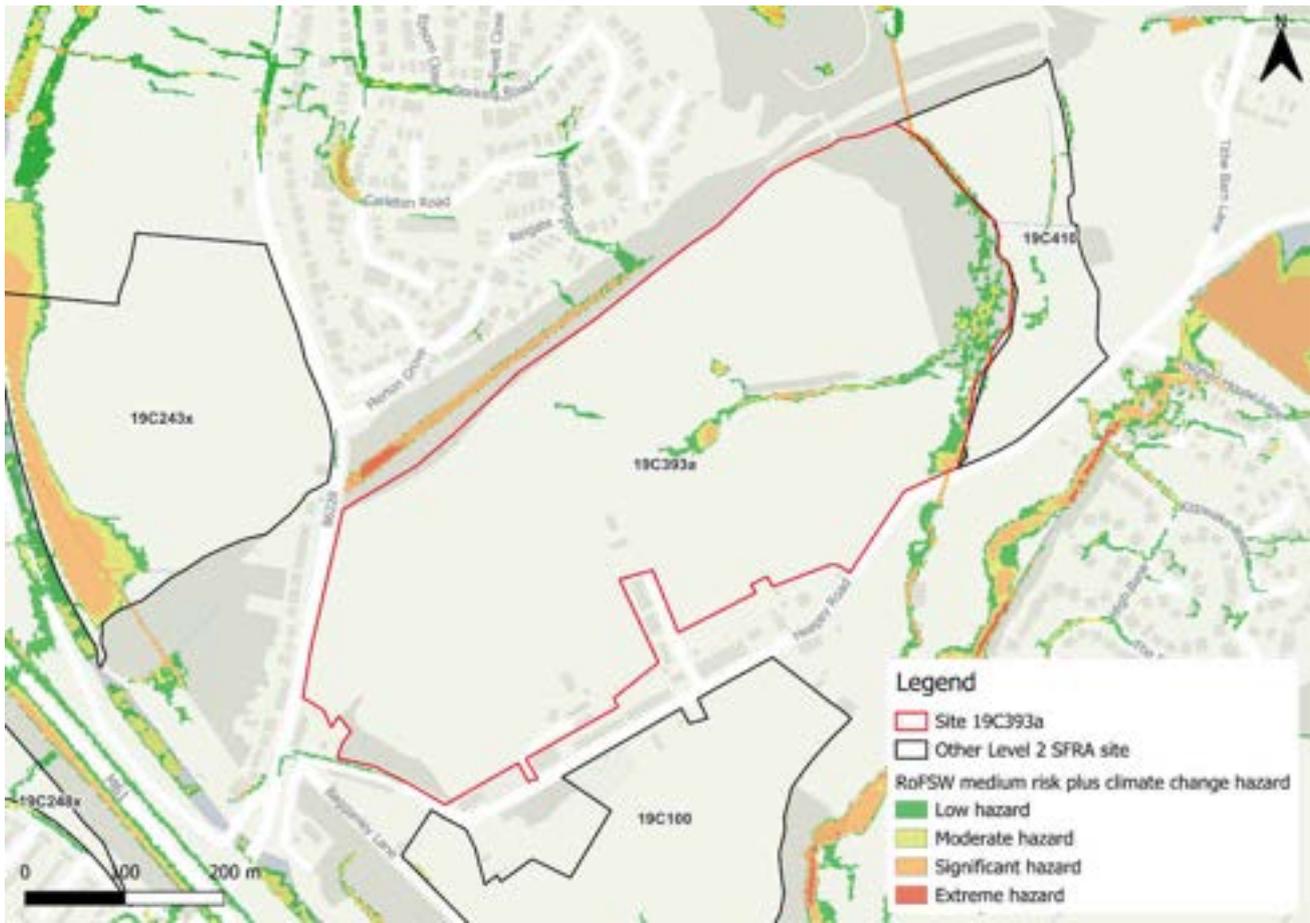


Figure 129-4: Medium risk event surface water flood hazards plus 45% climate change (based on Risk of Flooding from Surface Water map)

### 129.3 Observations, mitigation options and site suitability - surface water

- Current risk to the site is predominantly very low, with approximately 95% of the site being at very low risk. Surface water risk in the high risk event is confined to two areas of ponding within the centre of the site, which become greater in extent in the medium risk event. In the low risk event, a flow path along the drainage ditch within the east of the site develops and extends to the large flow path along Black Brook.
- Safe access and escape routes should be achievable via multiple locations around the site in all events.
- The effects of climate change on surface water have been modelled for this SFRA using the medium risk surface water flood depths plus 45% climate change. Surface water risk is greater than present day flood risk with more defined surface water flow paths and areas of ponding across the site. Any existing flow paths and topographic depressions should be maintained in site design.
- Were development plans to proceed, a full detailed drainage strategy would be required to ensure there is no increase in surface water flood risk elsewhere as a

result of new development. This will require surface water modelling based on layout plans and detailed design and full consultation with the LLFA.

- The RoFSW map is not suitable for identifying whether an individual property will flood and is therefore indicative. The RoFSW map is not appropriate to act as the sole evidence for any specific planning or regulatory decision or assessment of risk in relation to flooding at any scale without further supporting studies or evidence.

## 130 Risk from groundwater

Risk from groundwater sources is assessed in this SFRA using JBA's 5m Groundwater Emergence Map. This dataset is recommended for use by the EA in the SFRA Good Practice Guide<sup>82</sup>. Figure 4-1 shows the map for Site 19C393a and the surrounding areas and Table 130-1 explains the risk classifications.

Risk of groundwater emergence varies across the site. Within the east of the site, there is a risk groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots. Through the centre of the risk, there is a risk of groundwater emergence to subsurface assets. Groundwater emergence is unlikely across the rest of the site. Ground investigations will be required through the site-specific FRA to ascertain groundwater levels and conditions.

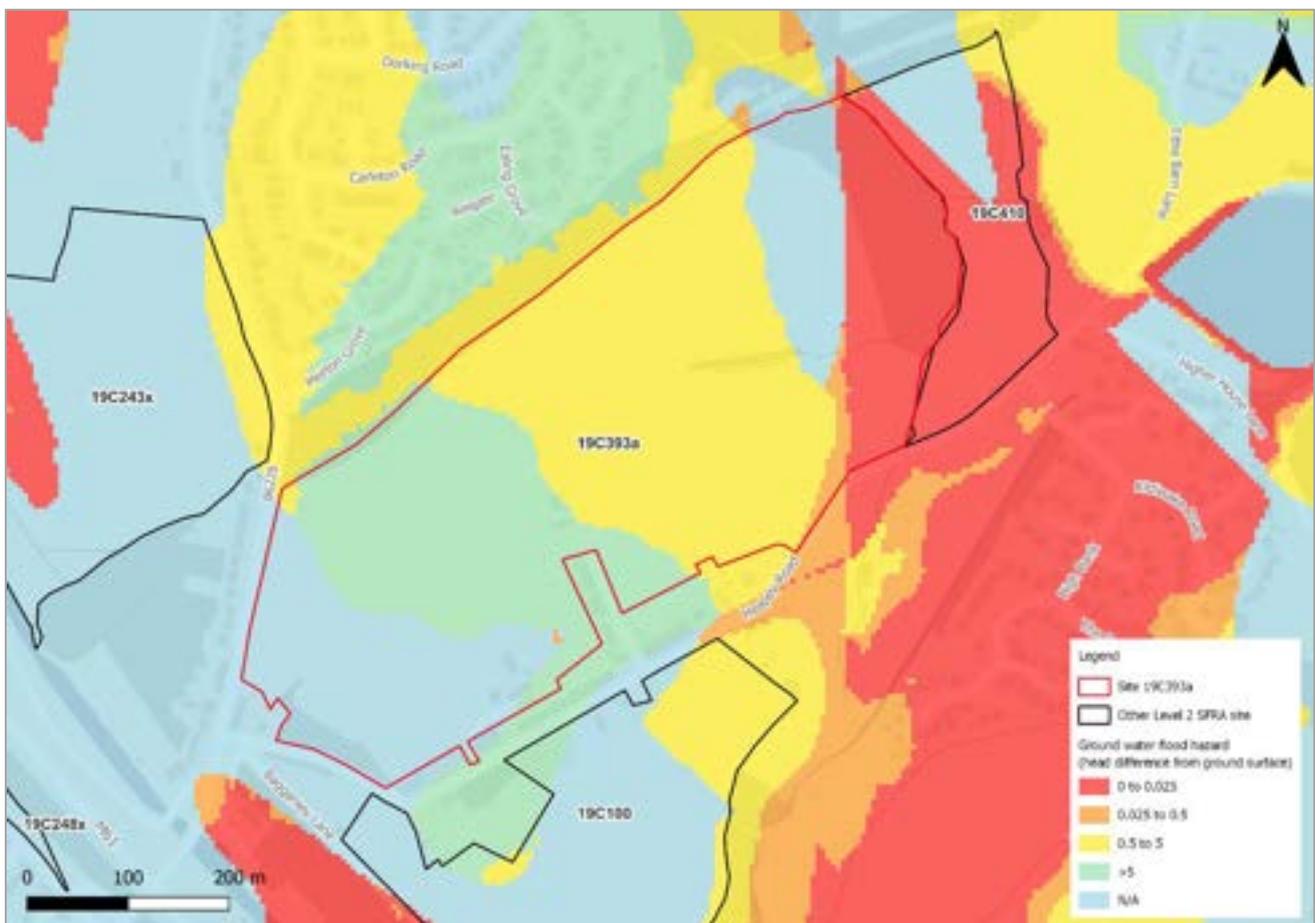


Figure 130-1: JBA 5m Groundwater Emergence Map

<sup>82</sup> [Strategic flood risk assessment good practice guide. ADEPT. December 2021.](#)

Table 130-1: Groundwater Flood Hazard Classification

Groundwater head difference (m)*	Class label
0 to 0.025	Groundwater levels are either at very near (within 0.025m of) the ground surface in the 100-year return period flood event. Within this zone there is a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots.
0.025 to 0.5	Groundwater levels are between 0.025m and 0.5m below the ground surface in the 100-year return period flood event. Within this zone there is a risk of groundwater flooding to surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally.
0.5 to 5	Groundwater levels are between 0.5m and 5m below the ground surface in the 100-year return period flood event. There is a risk of flooding to subsurface assets, but surface manifestation of groundwater is unlikely.
>5	Groundwater levels are at least 5m below the ground surface in the 100-year return period flood event. Flooding from groundwater is not likely.
N/A	No risk. This zone is deemed as having a negligible risk from groundwater flooding due to the nature of the local geological deposits.
*Difference is defined as ground surface in mAOD minus modelled groundwater table in mAOD.	

# 131 Overall site assessment

## 131.1 Can part b) of the exception test be passed?

The site is modelled to be at risk in the 1% AEP plus climate change event and is therefore required to pass part b) of the exception test<sup>83</sup>. It must be proven that the development can be safe for its lifetime, which is 100 years for residential development. This site should be able to pass the exception test if development avoids the area of the site modelled to be at risk in the 1% AEP undefended event plus higher central climate change allowance.

## 131.2 Recommendations, FRA requirements and further work

Based on the evidence presented in the Level 1 SFRA (2025) and this Level 2 SFRA:

- The proposed development of the site would see a change in the risk classification from less vulnerable to more vulnerable, according to NPPF.
- Given the change in use and therefore vulnerability of the site. The FRA must show that the development can be designed to be safe and that there is adequate emergency planning provision (para 014 FRC-PPG).
- There should be no development within the functional floodplain. There should be no development within 8m of Black Brook. This should be converted to a blue / green corridor to provide ecological, amenity and social value.
- Updated present day and climate change modelling of the reach of Black Brook adjacent to the site should be used to update this Level 2 SFRA at the earliest opportunity to provide a robust strategic assessment of flood risk to this site and surrounding areas. It would also be acceptable to use updated modelling to suitably assess risk through a site-specific FRA, as well as/instead of a Level 2 SFRA update.
- Residual risk to the site from a possible blockage of the culvert beneath Heapey Lane should be considered as part of a site-specific FRA.
- Based on current information, this site could be allocated if more vulnerable development avoids the area within the functional floodplain and the area to the south of the site modelled to be at risk in the 1% AEP event + 47% climate change following detailed modelling of the reach of Black Brook adjacent to the site.
- A detailed drainage strategy will be required for any new development given the large area of this site being converted from open space to development.
- Groundwater conditions must be investigated further through the site-specific FRA.
- Any FRA should be carried out in line with the NPPF; FRCC-PPG; EA guidance; Central Lancashire Local Plan and LLFA policies; and national and local SuDS policy and guidelines.

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83 Para 178 National Planning Policy Framework 2024

- Throughout the FRA process, consultation should be carried out with the following, where applicable, the LPA; LLFA; emergency planning officers; EA; UU; the highways authorities; and the emergency services.

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## **Appendix 3 – LLFA Response to Application Ref:22.00538/OUTMAJ**

**Contact:** Please contact the Local Planning Authority

**Date:** 09 June 2022

Dear Local Planning Authority,

Thank you for inviting the Lead Local Flood Authority (LLFA) to comment on the below application.

### PLANNING APPLICATION CONSULTATION RESPONSE

<b>Application Number:</b>	22/00538/OUTMAJ
<b>Proposal:</b>	Outline application for the erection of up to 200 dwellings (including 30% affordable housing) with all matters reserved save for access from Blackburn Brow
<b>Location:</b>	Little Knowley Farm Heapey Road Chorley PR6 9BQ

The LLFA is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015. It is in this capacity this response is compiled.

Comments provided in this representation, including conditions, are advisory and it is the decision of the Local Planning Authority whether any such recommendations are acted upon. The comments given have been composed based on the extent of the knowledge of the LLFA and information provided with the application at the time of this response.

#### **Lead Local Flood Authority Position**

The Lead Local Flood Authority has **no objection** to the above application subject to the inclusion of the following conditions, in consultation with the Lead Local Flood Authority:

#### **Condition 1 – Development is in accordance with the submitted Flood Risk Assessment and Surface Water Sustainable Drainage Strategy**

The development permitted by this planning permission shall be carried out in accordance with the principles set out within the site-specific flood risk assessment and surface water sustainable drainage strategy CW/220108/FRA01/REVB produced on 22/04/2022 by SCP.

The measures shall be fully implemented prior to occupation of the development and in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority in consultation with the Lead Local Flood Authority.

## **Reason**

To ensure satisfactory sustainable drainage facilities are provided to serve the site in accordance with the Paragraphs 167 and 169 of the National Planning Policy Framework, Planning Practice Guidance, Defra Technical Standards for Sustainable Drainage Systems and Policies 17 and 29 of the Central Lancashire Core Strategy.

## **Condition 2 – Final Surface Water Sustainable Drainage Strategy to be submitted**

No development shall commence in any phase until a detailed, final surface water sustainable drainage strategy for the site has been submitted to, and approved in writing by, the Local Planning Authority.

The detailed surface water sustainable drainage strategy shall be based upon the site-specific flood risk assessment and indicative surface water sustainable drainage strategy submitted and sustainable drainage principles and requirements set out in the National Planning Policy Framework, Planning Practice Guidance and Defra Technical Standards for Sustainable Drainage Systems. No surface water shall be allowed to discharge to the public foul sewer(s), directly or indirectly.

The details of the drainage strategy to be submitted for approval shall include, as a minimum;

- a) Sustainable drainage calculations for peak flow control and volume control for the:
  - i. 100% (1 in 1-year) annual exceedance probability event;
  - ii. 3.3% (1 in 30-year) annual exceedance probability event + 40% climate change allowance, with an allowance for urban creep;
  - iii. 1% (1 in 100-year) annual exceedance probability event + 45% climate change allowance, with an allowance for urban creep
- b) Final sustainable drainage plans appropriately labelled to include, as a minimum:
  - i. Site plan showing all permeable and impermeable areas that contribute to the drainage network either directly or indirectly, including surface water flows from outside the curtilage as necessary;
  - ii. Sustainable drainage system layout showing all pipe and structure references, dimensions and design levels; to include all existing and proposed surface water drainage systems up to and including the final outfall;
  - iii. Details of all sustainable drainage components, including landscape drawings showing topography and slope gradient as appropriate;
  - iv. Drainage plan showing flood water exceedance routes in accordance with Defra Technical Standards for Sustainable Drainage Systems;
  - v. Finished Floor Levels (FFL) in AOD with adjacent ground levels for all sides of each building and connecting cover levels to confirm minimum 150 mm+ difference for FFL;
  - vi. Details of proposals to collect and mitigate surface water runoff from the development boundary;

- vii. Measures taken to manage the quality of the surface water runoff to prevent pollution, protect groundwater and surface waters, and delivers suitably clean water to sustainable drainage components;
- c) Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltrations rates and groundwater levels in accordance with BRE 365.
- d) Evidence of an assessment of the existing on-site watercourse and culverted watercourse to be used, to confirm that these systems are in sufficient condition and have sufficient capacity to accept surface water runoff generated from the development.
- e) Evidence that a free-flowing outfall can be achieved. If this is not possible, evidence of a surcharged outfall applied to the sustainable drainage calculations will be required.
- f) Evidence of an agreement in principle with the third-party asset owner to connect to any off-site drainage ditch or culvert.

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

### **Reason**

To ensure satisfactory sustainable drainage facilities are provided to serve the site in accordance with the Paragraphs 167 and 169 of the National Planning Policy Framework, Planning Practice Guidance, Defra Technical Standards for Sustainable Drainage Systems and Policies 17 and 29 of the Central Lancashire Core Strategy.

### **Condition 3 – Construction Surface Water Management Plan**

No development shall commence until a Construction Surface Water Management Plan, detailing how surface water and stormwater will be managed on the site during construction, including demolition and site clearance operations, has been submitted to and approved in writing by the Local Planning Authority.

The details of the plan to be submitted for approval shall include for each phase, as a minimum:

- a) Measures taken to ensure surface water flows are retained on-site during the construction phase(s), including temporary drainage systems, and, if surface water flows are to be discharged, they are done so at a restricted rate that must not exceed the equivalent greenfield runoff rate from the site.
- b) Measures taken to prevent siltation and pollutants from the site into any receiving groundwater and/or surface waters, including watercourses, with reference to published guidance.

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

### **Reasons**

To ensure the development is served by satisfactory arrangements for the disposal of surface water during each construction phase(s) so it does not pose an undue surface

water flood risk on-site or elsewhere during any construction phase in accordance with Paragraph 167 of the National Planning Policy Framework.

#### **Condition 4 – Sustainable Drainage System Operation and Maintenance Manual**

The occupation of the development shall not be permitted until a site-specific Operation and Maintenance Manual for the lifetime of the development, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved in writing by the Local Planning Authority.

The details of the manual to be submitted for approval shall include, as a minimum:

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

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

#### **Reason**

To ensure that surface water flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property, and ecological systems, and to ensure that the sustainable drainage system is subsequently maintained pursuant to the requirements of Paragraph 169 of the National Planning Policy Framework.

#### **Condition 5 – Verification Report of Constructed Sustainable Drainage System**

The occupation of the development shall not be permitted until a site-specific verification report, pertaining to the surface water sustainable drainage system, and prepared by a suitably competent person, has been submitted to and approved in writing by the Local Planning Authority.

The verification report must, as a minimum, demonstrate that the surface water sustainable drainage system has been constructed in accordance with the approved drawing(s) (or detail any minor variations) and is fit for purpose. The report shall contain information and evidence, including photographs, of details and locations (including national grid references) of critical drainage infrastructure (including inlets,

outlets, and control structures) and full as-built drawings. The scheme shall thereafter be maintained in perpetuity.

### **Reason**

To ensure that surface water flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property, and ecological systems, and to ensure that the development as constructed is compliant with the requirements of Paragraphs 167 and 169 of the National Planning Policy Framework.

### **Reason for Pre-Commencement Conditions**

Drainage is not only a material consideration but an early and fundamental activity in the ground construction phase of any development and it is likely to be physically inaccessible at a later stage by being buried or built over. It is of concern to all flood risk management authorities that an agreed approach is approved before development commences to avoid putting existing and new communities at risk.

The National Planning Policy Framework considers sustainable drainage systems to be important and states that they should be incorporated unless there is clear evidence that this would be inappropriate and, as such the Lead Local Flood Authority needs to be confident that flood risk is being adequately considered, designed for and that any residual risk is being safely managed. To be able to do this the Lead Local Flood Authority requires an amount of certainty either by upfront detail or secured by way of appropriate planning condition(s).

The proposed pre-commencement condition(s) allows for the principle of development to be granted and full detailed drainage designs to be conditioned for approval via a discharge of condition application which could be more favourable to developers in terms of less delay and less financial outlay early in the process. Non-acceptance of the pre-commencement condition could lead the Lead Local Flood Authority to object to the principle of development until all residual risk issues are safely managed.

The Lead Local Flood Authority asks to be consulted on the details submitted for approval to your authority to discharge these conditions and on any subsequent amendments/alterations.

### **Informative(s)**

#### **Informative 01 – Ordinary Watercourse (Land Drainage) Consent**

Under the Land Drainage Act 1991 (as amended by the Flood & Water Management Act 2010), you need consent from the Lead Local Flood Authority if you want to carry out works within the banks of any ordinary watercourse which may alter or impede the flow of water, regardless of whether the watercourse is culverted or not.

- **Consent must be obtained before starting any works on site. It cannot be issued retrospectively.**
- **Sites may be inspected prior to the issuing of consent.**
- **Unconsented works within the Highway or Sustainable Drainage System may prevent adoption.**

- **Applications to culvert an existing open ordinary watercourse will generally be refused.**
- **Enforcement action may be taken against unconsented work.**

For the avoidance of doubt, once planning permission has been obtained it **does not** mean that Ordinary Watercourse Consent will be given. It is strongly advised that you obtain any required consent before or concurrently as you apply for planning permission to avoid delays.

You should contact the Flood Risk Management Team at Lancashire County Council to obtain Ordinary Watercourse Consent. Information on the application process and relevant forms can be found here:

<https://www.lancashire.gov.uk/flooding/drains-and-sewers/alterations-to-a-watercourse/>

### **What this response DOES NOT cover**

This response does not cover highway drainage, matters pertaining to highway adoption (s38 Highways Act 1980) and/or off-site highway works (s278 Highways Act 1980). Should the applicant intend to install any sustainable drainage systems under or within close proximity to a public road network (existing or proposed), then they would need to separately discuss the use and suitability of those systems with the relevant highway authority.

The applicant is encouraged to discuss the suitability of any overland flow routes and/or flood water exceedance with the relevant highway authority should they have the potential to impact the public highway network and/or public highway drainage infrastructure (either existing or proposed).

### **Material Changes or Additional Information to this Planning Application**

If there are any material changes to the submitted information or additional information provided after this LLFA response to the Local Planning Authority which impact surface water, the Local Planning Authority is advised to re-consult the LLFA. Please be aware this will be classed as a re-consultation with a full 21-day response time. Re-consultations should be sent to our identified mailbox.

Please send a copy of the decision notice to our identified mailbox.

Yours faithfully,

**Elliot Burton**

Lead Local Flood Authority



## **Appendix 4 – Ecology Response to Application ref:22/00538/OUTMAJ**

## Phil Robinson

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**From:** David Dutton <david.dutton@tameside.gov.uk>  
**Sent:** 17 June 2022 18:55  
**To:** DCON  
**Subject:** Planning application 22/00538/OUTMAJ Little Knowley Farm

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Hi Mike

Thank you for consulting the GMEU

### Summary

Further information is recommend regarding great crested newts and amendments to the net gain metric. Other ecological issues relating to bats, nesting birds, brown hare, Japanese knotweed and proximity to a biological heritage site can likely be resolved via condition.

### Proximity to West Pennine Moors SSSI

I agree with the consultant that the SSSI is sufficiently distant not to require consultation with Natural England. The development does not automatically trigger the requirement at this distant.

### Proximity to Biological Heritage Site (BHS)

A BHS is located to the north of the proposed public open space on the other side of the disused railway line. I think it is very unlikely that any direct impacts to the BHS will occur due to the buffer created by the disused railway. I accept however that additional public pressure is likely to occur if permission was granted. Measures to mitigate this potential impact are justified such as interpretation, financial contribution to improving access route in the BHS etc. **Further information should be provided as part of reserved matters.**

### Great Crested Newts

The consultants have acknowledged that the pond on site has the potential to provide breeding habitat for great crested newts but as the pond is to be retained within public open space they regard reasonable avoidance measures as adequate. I am not so certain, that reasonable avoidance measures alone would be adequate if gcn were present. It is currently not clear how much development will occur within the zone of influence of this pond, but there appears to be more than 0.5ha of development within 100m (just) when the SUDs pond and housing are taken in to account and there will likely to be additional works in the public open space. When run through Natural Englands rapid risk assessment this level of disturbance makes the risk of an offence highly likely if gcn are were present. Even if the level of disturbance is below 0.5ha, the level of risk is still high.

***I therefore recommend that prior to determination, either a gcn survey (now likely too late this year) is provided or alternatively enquiries made regarding whether work near this pond would be eligible for district licensing which I believe (if the pond is eligible) would be suitable for this site.***

#### Bats

Mature trees on site were assessed for bat roosting potential with several oaks coming back as high risk. All are however shown as retained in the illustrative masterplan. As this may change at any reserved matters stage, I recommend a condition along the following lines is applied to any permission.

***The removal of any of the oak trees called T2, T3, T4, T5, T6, T7 and a tree in G10 may have the potential to cause harm to bats as identified in the Ecological Impact Assessment by Ascerta ref. P.1614.22 section 5.2 and shall not in any circumstances occur unless a bat emergence survey has been provided to and agreed in writing by the local planning authority***

The consultant has also identified that the boundaries and line of trees may have importance for bat foraging and commuting though correctly note these will not be directly impacted. Full activity surveys have been recommended. I support this but as I accept that direct impacts can be avoided if required, I am happy for this information to be provided at reserved matters. I therefore recommend a condition along the following lines is applied to any permission.

***As part of reserved matters, bat activity surveys will be carried in-line with the recommendations of the Ecological Impact Assessment by Ascerta ref. P.1614.22 section 5.2 as already supplied and agreed in writing by the LPA***

#### Other Protected Species

No evidence of any other protected species was identified on the site, but as suitable habitat was present for species such as badger, updates recommended if development was delayed. As this is an outline application, I recommend updates are provided as part of reserved matters. I recommend a condition along the following lines is applied to any permission.

***As part of reserved matters and updated ecological impact assessment will be provided to and agreed in writing by the LPA***

#### Nesting Birds

The consultants note that the site is suitable for both species that nest in trees and scrub and ground nesting species such as lapwing and skylark and therefore recommend site clearance outside the bird nesting season. I agree. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. I recommend a condition along the following lines be applied to any permission.

***No works to trees or shrubs shall occur or earthworks or vegetation stripping commence between the 1<sup>st</sup> March and 31<sup>st</sup> August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to clearance and written confirmation provided that no active bird nests are present which has been agreed in writing by the LPA.***

Whilst I accept that the site is very unlikely to have high importance for birds, I believe that more information is required in order to inform mitigation if permission was granted for a development of this size. I therefore recommend that breeding and wintering bird information is provided as part of any reserved matters application. The details can be conditioned along the following lines.

***As part of reserved matters breeding and wintering bird report will be provided to and agreed in writing by the LPA***

#### Other Wildlife and Priority Species

The consultant notes the risk to other wildlife such as hedgehog, other amphibians and badger during the construction phase and recommends reasonable avoidance measures. Species such as brown hare may also be present. I recommend a condition along the following lines is applied to any permission.

***As part of reserved matters reasonable avoidance measures for the protection of priority and protected species such as badger, hedgehog, brown hare and amphibians that may forage on occasion across the site will be provided to and agreed in writing by the LPA***

#### Invasive Species

Japanese knotweed was recorded within the woodland to be retained along the eastern side of the site. Eradication is recommended partly because it is best practice but also as part of the measures to enhance the biodiversity unit value of the woodland. I support both reasons. Options are provided on how to control this species. I would regard herbicide treatment as the only viable approach if located in woodland. Excavation is very unlikely to be feasible. ***The final details on how control of the japanese knotweed will occur can be provided as part of reserved matters.***

#### Contributing to and Enhancing the Natural Environment

Section 174 of the NPPF 2021 states that the planning policies and decisions should contribute to and enhance the natural and local environment. A significant area of the site is being retained to east and west as well as key features of ecological value such as the mature trees. Given the low ecological value of the grassland, it is therefore possible that habitat mitigation can be achieved on site. Mitigation for species losses is likely to be primarily for nesting birds given there is no evidence of any other species on the site. Measures for amphibians and bats are however recommended.

A defra metric has been provided. This demonstrates a 4% net gain for area based habitats and 48% for linear habitats. There are however what appear to be some discrepancies in the report some of which would lower the level of mitigation and others that would enhance the mitigation so overall it is not clear at this time whether in fact a net gain will be achieved.

Potential issues include with the habitat baseline include:

- The main habitat on the site has been recorded as other broadleaved woodland 7.3ha with grassland recorded as covering only 6.45ha. This in my opinion is an error as aerial photographs clearly show the majority of the 15ha site is grassland.
- They have recorded the grassland as other neutral grassland a medium distinctiveness habitat, in the metric whilst recording the habitat in the report as species poor semi-improved grassland. This would equate to modified grassland in the metric a low ecological value habitat.
- They also record the grassland as being in good ecological condition. This would appear to be unlikely given it is horse grazed and semi-improved species poor, though as I have not visited the site it could be true.

There are also probably discrepancies with the habitats created:

- The area of habitat created equal exactly the same as the baseline area despite the baseline metric indicating a significant area is to retained unchanged. Whilst I accept that urban tree creation mean that the final areas can exceed the baseline as the tree and the habitat under the tree are counted ie parts of the site are double counted, having exactly the same areas seem too much of a coincidence.
- They regard all urban trees as achieving good condition. Given some of these trees will be in gardens and will need to survive 30 years, I think this is over optimistic. It is inevitable that some of the trees in private ownership will be removed. I would recommend a compromise of assuming of moderate condition to take account of losses.
- They may also have over estimated how large the trees will be in 30 years, though without the detailed calculation this is difficult to be certain of.

I have not checked detail of the linear habitats as it is quite feasible to mitigate for any hedge loss on site.

***I therefore recommend that prior to determination the metric is revisited in light of my comments above.***

**David Dutton**

**Ecologist**

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