



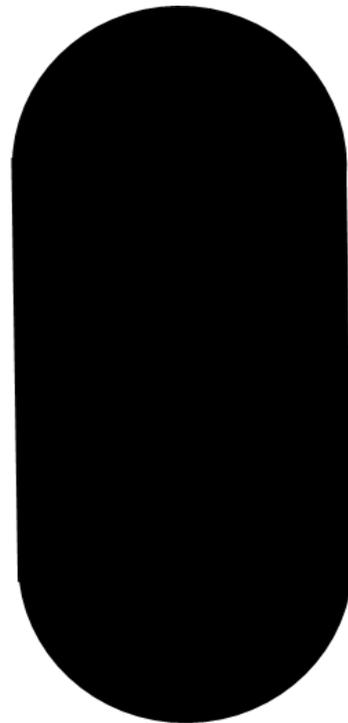
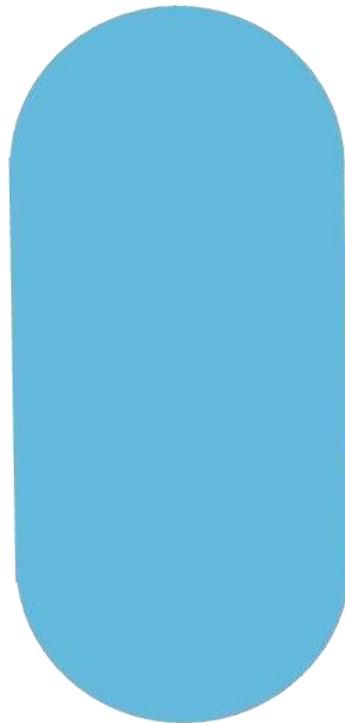
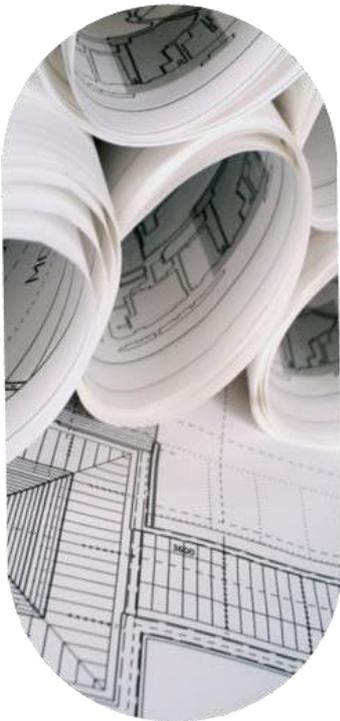
 Part of Shakespeare Martineau

Central Lancashire Local Plan

Publication Draft

Taylor Wimpey UK Limited

April 2025



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1. Introduction

- 1.1. These representations have been prepared by Marrons on behalf of Taylor Wimpey UK Limited (Taylor Wimpey) in response to the ongoing Regulation 19 consultation on the Central Lancashire Local Plan 2041. Taylor Wimpey will submit separate representations in regard to their land interest in allocation HS2.26 'Land at east of New Street, Mawdesley' and allocation SS6 'Pickering Farm'. Taylor Wimpey support the allocation of the sites and more generally a plan-led system.
- 1.2. This report provides responses to draft policies relating to the spatial strategy, scale and distribution of housing and housing provision. Alongside this report, site specific representation and relevant policy comments are provided in respect of Taylor Wimpey's land interest at Euxton, Chorley.
- 1.3. These representations should be read alongside the below technical documents comprising;
 - Central Lancashire Housing Need Assessment;
 - Central Lancashire Housing Land Supply Assessment;
 - Central Lancashire Local Plan Viability Assessment;
 - Land at Euxton, Chorley Grey Belt Assessment
- 1.4. Notwithstanding the support for the preparation of a Local Plan, we object to a number of the draft Policies contained within the Publication version of the Central Lancashire Plan. In their current form, they cannot be found sound at Examination.
- 1.5. The Local Plan is being prepared under section 28 of the Planning and Compulsory Purchase Act 2004 ("Act"). Section 28 of the Act requires that anything that is done by one of the local planning authorities in connection with a local plan must be done by each of them. Accordingly, the Local Plan will be required to be adopted by a separate decision of each local authority and will comprise three separate local plans that have been concurrently prepared. A formal joint committee of the local planning authorities has not been established under section 29 of the Act. Therefore, the Local Plan is not a single joint local plan.
- 1.6. We recommend that the Councils immediately pause submission of the Plan to the Secretary of State and any further preparation for Examination in Public. The Councils should undertake the additional work required to achieve a Plan capable of being found sound by meeting the new standard method and allocating new land non-arbitrarily. If the Councils opt to submit the Plan irrespective of outstanding objections in respect of legal compliance, duty to cooperate and soundness, the Inspector(s) should determine that the Submission Version Plan has not satisfied the

relevant legal requirements and tests of soundness within national policy. The Plan is not capable of being found sound, subject to Modification. This is only achievable through the full assessment and reconsideration of sites and settlements across the Plan area, including our clients' land interests set out within this submission.

2. A National Mandate for Housing Growth

- 2.1. Since the previous round of consultation on the CLLP, a new Government has been elected and has, immediately upon coming into office, confirmed a commitment to delivering 1.5 million new homes over the current Parliament, turbocharging growth with new mandatory targets to ramp up housebuilding. This requires the delivery of 370,000 new homes per year, with all areas of the country required to play their part in the national effort.
- 2.2. Deputy Prime Minister and Secretary of State for Housing, Angela Rayner stated with the release of update national policy;
- “We cannot shirk responsibility and leave over a million families on housing waiting lists and a generation locked out of home ownership. Our Plan for Change means overhauling planning to make the dream of a secure home a reality for working people. Today’s landmark overhaul will sweep away last year’s damaging changes and shake-up a broken planning system which caves into the blockers and obstructs the builders. I will not hesitate to do what it takes to build 1.5 million new homes over five years and deliver the biggest boost in social and affordable housebuilding in a generation. We must all do our bit and we must all do more”.*
- 2.3. The importance of the need to turbo charge housebuilding has been highlighted by the Office for Budget Responsibility, who as part of a report released at the time of the Spring 2025 Statement, confirmed that the Government’s planning reforms and push to get Britain building were expected to see the UK economy grow by 0.2% by 2029/2030. This growth would be worth circa £6.9 billion in today’s prices. As such, not only is the delivery of housing essential to ensure that everyone in the UK has a safe and secure home, but the role of the housing sector in the wider economy is essential for long-term prosperity.

3. National Planning Policy Context

Transitional Arrangements

- 3.1. The CLLP is being prepared during a time of considerable legislative and national policy reform.
- 3.2. On the 12th December 2024, a revised National Planning Policy Framework (NPPF) was published by the government.
- 3.3. The transitional arrangements set out in the NPPF 2024 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; . . .’*.
- 3.4. The Written Ministerial Statement (WMS) "Building the Homes We Need" issued by Deputy Prime Minister Angela Raynor on July 30, 2024, emphasises the importance of each local authority having a development plan in place. It also states that plans at an advanced stage of preparation (Regulation 19) can continue to be examined, unless there is a significant discrepancy between the Plan and the new local housing need figure, in which case authorities are asked to rework their plans to account for the higher figure.
- 3.5. This is considered further below in Section 5 of this report, but given the scale of work we consider necessary to ensure that the Plan submitted is capable of being found sound, whilst acknowledging that that the Plan as being consulted upon was prepared in the context of the 2023 NPPF, we recommend that the Council consider a pause in submitting the Plan, with amends made to bring it in line with the national mandate for growth and the provisions of the revised Framework.

National Planning Policy Framework 2023

- 3.6. Notwithstanding this, the National Planning Policy Framework (the "Framework"), under which the Publication Plan has been prepared was published in December 2023 and sets out the Government's planning policies for England and how they should be applied (paragraph 1). The policies that are relevant to the plan making process and these representations are summarised below.
- 3.7. At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision-taking (paragraph 11). For plan-making, the presumption means:

A. All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

B. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

I. The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

II. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

- 3.8. Paragraph 15 states that: “The planning system should be genuinely plan led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”
- 3.9. Paragraph 16 requires plans to be prepared with the objective of contributing to the achievement of sustainable development, and it requires plans to be prepared positively in a way that is aspirational but deliverable.
- 3.10. Paragraph 20 stipulates that strategic policies should set out an overall strategy for the pattern, scale and design quality of places to make sufficient provision for (inter alia): housing (including affordable housing); employment; and, conservation and enhancement of the natural, built and historic environment.
- 3.11. Paragraph 22 confirms that “strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”
- 3.12. Paragraph 23 stipulates that strategic policies should provide a clear strategy for bringing sufficient land forward at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 3.13. Paragraphs 24 to 27 require Local Planning Authorities to cooperate with one another, and with other relevant bodies, to address strategic matters and consider whether development needs that cannot be met wholly within a particular plan area

could be met elsewhere. Statements of Common Ground should be prepared to document progress on addressing cross boundary matters.

- 3.14. Paragraph 31 requires that the preparation of policies should be underpinned by relevant, up-to-date, adequate and proportionate evidence.
- 3.15. Paragraph 32 states that: “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”
- 3.16. Paragraph 35 explains how local plans and spatial development strategies will be assessed in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:
 - a) 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;
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) 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
 - d) 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.
- 3.17. Paragraph 69 of the Framework requires that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
 - a) specific, deliverable sites for five years following the intended date of adoption (with an appropriate buffer, as set out in paragraph 77 of the Framework); and
 - b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

- c) Paragraph 70 of the Framework then states small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and that to promote the development of a good mix of sites local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.
- 3.18. Paragraph 74 of the Framework recognises the important contribution that larger scale development can make, stating that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

Duty to Cooperate

- 3.19. The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the Shropshire Local Plan Review and the Bournemouth, Christchurch and Poole Local Plan, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 3.20. Whilst we recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, the Councils must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation. We consider that the Councils, on the available evidence have failed to demonstrate sufficient cross-boundary working.
- 3.21. Indeed paragraph 2.6.1 of the Interim Duty to Cooperate Statement identifies that a number of Statements of Common Ground are being prepared with neighbouring authorities as listed below;
- Blackburn with Darwen Borough Council
 - Bolton Council

- Fylde Borough Council
 - Greater Manchester Combined Authority
 - Ribble Valley Borough Council
 - West Lancashire Borough Council
 - Wigan Metropolitan Borough Council
 - Wyre Borough Council
- 3.22. Given the constraints present in the wider area, matters of unmet need should be considered in detail.
- 3.23. It is therefore surprising to note that within the Scheduled of DtC meetings and Outcomes set out at Appendix 1 of the Interim Duty to Cooperate Statement, only three meetings have been held with neighbouring authorities, all of which took place in November 2024.
- 3.24. We acknowledge that the Duty to Cooperate is an ongoing and iterative process, but given the complexities associated with cross-boundary infrastructure capacity and planning, it would be expected that further progress would have been made ahead of Regulation 19 consultation commencing.
- 3.25. Should ongoing cooperation result in the need to consider cross-boundary infrastructure, or indeed unmet need that could result in a requirement to allocate additional land for housing or employment needs, the Councils would likely need to undertake a further Regulation 19 consultation.

4. Integrated Assessment

- 4.1. An Integrated Assessment of the Central Lancashire Local Plan (January 2025) has been prepared by LUC.
- 4.2. We object to the Integrated Appraisal process and the identification and assessment of reasonable alternatives.
- 4.3. In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 4.4. The Sustainability Appraisal and SA reporting invariably requires a substantial amount of work. However, legislation on Strategic Environmental Assessment (SEA), and also SA of Local Plans, is very specific and detailed about the required contents of the SA Report. As a result, SA Reports can often be long and complex and are also regularly scrutinised and sometimes challenged through Local Plan examinations on their contents, also through legal challenge in the High Court on the process of preparation. It is therefore essential that the legislation is followed very carefully and that the SA Report is examined fully to ensure compliance.
- 4.5. With reference to the quantum of housing, it is confirmed at paragraph 2.23 that despite the Central Lancashire Housing Study having identified nine scenarios for assessing local housing needs, the IA only tests four scenarios. It is stated that this is on the basis that the five excluded scenarios were formulated on trend-based projections, which have historically been volatile in Central Lancashire and are 'considered unlikely' to accurately capture all circumstances to be considered in assessing housing needs.
- 4.6. The five scenarios set out have been group into three options tested through the IA as follows:
 - Option 1: LHN Baseline – 944 dwellings
 - Option 2: POPGROUP 5-Year – 1,212 dwellings
 - Option 3: Employment-Led Projections – 1,275 dwellings
- 4.7. The Councils preferred approach is Option 3 which out of the three tested scenarios, would deliver the highest quantum of growth, but which would result in a significant redistribution of growth across the three authorities compared with LHN. Significantly

higher levels of growth would be required within South Ribble, higher growth would be required in Preston, with a significant reduction in growth directed to Chorley as set out below;

Table 1: Comparison of distribution of growth

LPA	% of requirement – Option 1 LHN	% of requirement – Option 3 Employment led	% difference
Chorley	54%	33-38%	Between -16% and -21%
Preston	29%	30-36%	Between +1% and +7%
South Ribble	18%	31-33%	Between +13% and +15%

- 4.8. It is surprising to note that the IA fails therefore to explicitly consider the redistribution of growth proposed in Option 3 and focuses more generally on the quantum of growth (with the notable exception of noting in regard to criteria IA9 that Option 2 would promote sustainable transport to a greater degree).
- 4.9. The simple fact is that LHN indicates that Chorley has the greatest requirement for housing, and the approach being taken by the Council to redistribute this fails to consider the socio-economic and environmental impact of this.
- 4.10. The Councils should treat this exercise in the same way they would any assessment of unmet needs and should consider, as part of the IA, the impact of additionally car journeys for work, leisure and socialising on air quality, congestion and the wider environmental and climate aspirations of the Plan.
- 4.11. Despite the narrow definition of environmental benefit and harm, the IA does not give enough weight to economic and social objectives. The socioeconomic benefits of providing housing and job growth in the most suitable locations to fulfil need where said need arises is not sufficiently taken into account in the Plan making process as outlined in the IA.
- 4.12. In regard to spatial strategy options, the IA tests four options;
- Option 1: Roll forward the current approach
 - Option 2: Urban intensification
 - Option 3: More urban extensions
 - Option 4: A more dispersed pattern of development
 - Option 5: a New Settlement

- 4.13. The Councils' preferred Option is 1: Roll forward the current approach, which it is suggested seeks to focus growth on the most sustainable locations whilst not seeking to fundamentally restrict development elsewhere in the plan area.
- 4.14. Whilst we have concerns over the testing of reasonable alternatives, we do consider that Option 4, even in the Councils' own assessment, performs slightly more favourably against the identified criteria than Option 1.
- 4.15. As such it appears that the Councils' chosen strategy has been pre-determined with further testing of reasonable alternatives seemingly dismissed.
- 4.16. We support a more dispersed spatial strategy, whilst acknowledging the need to focus as much growth as possible on urban areas, we consider that the limitations in terms of highway capacity and air quality, set out in the IA, in Preston in particular, are not sufficiently reflected in the scoring set out in the IA.
- 4.17. Turning to the assessment of sites, it is noted that within the supporting text of the Plan it is confirmed that the assessment of sites within the Green Belt was 'parked' whilst seeking to establish if needs could be met outside of the Green Belt.
- 4.18. It is noted that the Plan has been prepared against the provisions of the NPPF 2023, but in the context of the need to urgently boost delivery and with the revisions to national policy and the introduction of Grey Belt and clearer guidance on inappropriate development in the Green Belt, we do not consider it justified to fail to consider sustainable Green Belt sites, which could deliver more significant environmental and socio-economic benefits than many Brownfield sites. The IA therefore does not consider all reasonable alternatives.
- 4.19. The scoring of the SA should take into account the advantages of early site delivery and the delivery of community benefits, and it should be acknowledged that the delivery of community infrastructure is essential for attaining the SA's goals. As drafted the SA fails in this regard.
- 4.20. We fundamentally consider the IA to be inadequate and legally non-compliant. We consider that the IA fails to adequately, accurately and consistently test reasonable strategic options and specific sites.

5. Housing Requirement

- 5.1. We object to Policy HS1: Scale of Housing Growth and Distribution of Housing Requirements on the basis that it is not considered to be sound, not justified, not effective and not consistent with national policy.
- 5.2. Policy HS1 specifies that 23,652 dwellings, or an average of 1,314 homes per year, must be delivered in Central Lancashire across the Local Plan period of 2023 and 2041. This is based on:
 - A Housing Study Update produced by DLP, in which the preferred scenario gives a housing need of 1,237 dwellings per annum.
 - An arbitrary 77 dwellings per annum adjustment to bring the number to 80% of standard method in NPPF2024 (at the time the draft Local Plan was produced), required for the plan to fall under its transitional provisions.
- 5.3. In addition, the policy seeks to distribute this requirement among the three authorities as follows;
 - 6,012 homes in the Chorley (334dpa);
 - 9,360 homes in Preston (520dpa) and;
 - 8,280 homes in South Ribble (460dpa).
- 5.4. Firstly, in line with paragraph 22 of the Framework, strategic policies should anticipate and address longer-term needs and opportunities over a minimum of 15 years after adoption.
- 5.5. The Councils' Local Development Scheme indicates adoption of the Local Plan in December 2026. It is noted that the LDS indicates that Regulation 19 consultation was anticipated to end in March 2025 and as such, the programme is already circa 1 month behind where the Council anticipated.
- 5.6. Based on experience from multiple and numerous Local Plan Examinations, notwithstanding our concerns about the ability of the Plan, as being consulted upon, to be found sound, if the Plan were to be submitted for Examination, given the number of Plans at the same stage, we would expect that the Councils' timetable would slip yet further, and that realistically, adopted in 2026 is highly unlikely.
- 5.7. As such, we recommend that as an absolute minimum the Plan period is extended by 1 year to run until 2042. Noting however the strategic nature of some of the proposed allocations, it would be our recommendation that the Plan period is extended to 2043

and that the Council should allocate an additional 2-years worth of housing and employment land.

- 5.8. The Central Lancashire Housing Study Update (Dec 2024) lays out a number of scenarios and their dwelling outputs, ranging from 705 dpa from the SNPP-2014 scenario to 1,313 dpa from the PG-5yr scenario (though it should be noted that the PG-5yr scenario is not included in the Study as a reasonable alternative).
- 5.9. The report also sets out the local housing need (LHN) based on the Government's previous standard, which was supported by the 2014-based household projections.
- 5.10. This results in an LHN of 944 dpa Central Lancashire, 506 dpa in Chorley, 269 dpa in Preston, and 169 dpa in South Ribble. The Employment led scenario, which is 1,237 dpa, is broken down as follows down to 410 dpa for Chorley, 441 dpa for Preston, and 386 dpa for South Ribble. It is noted that the distribution proposed in the Plan differs further as outline above, with yet a further reduce in the contribution Chorley is expected to make to the overall requirement.
- 5.11. Our significant concerns relating to the redistribution, based on the settlement hierarchy, is detailed in section 4 above, but we have seen no substantiation of the approach taken or indeed explanation as to why the evidence base and the Plan as being consulted upon differs.
- 5.12. Further, it is prudent to compare the current LHN outcome with the previous outcome and indeed the distribution of growth set out in Policy HS1. The table below provides a useful summary;

Table 2: Comparison of requirement scenarios

LPA	LHN 2024	LHN 2023	HS1	% Increase HS1 to LHN 2024
Chorley	601	506	334	79.9%
Preston	662	269	520	27.3%
South Ribble	546	169	460	18.7%
Combined	1,809	944	1,314	37.7%

- 5.13. The below considers the percentage contribution that each LPA would make to the combined requirement for each of the above;

Table 3: Comparison of distribution of requirement scenarios

LPA	LHN 2024	LHN 2023	HS1
Chorley	33.4%	53.6%	25.4%
Preston	35.7%	28.5%	39.6%
South Ribble	30.9%	17.9%	35.0%

- 5.14. As is clear from the above, whilst the latest LHN results in a more even spread across the three Councils', the needs arising from Chorley are being disproportionately distributed between Preston and South Ribble. This is confirmed and discussed in detailed in the accompanying Stantec Local Housing Need Assessment 2025.
- 5.15. The proposed housing requirement, derived from a cautious approach in the Cambridge Econometrics employment led scenario is equal to 80% of the new standard method. As previously stated, the transitional provisions outlined in the NPPF indicate that for local plan preparation, the policies in this version of the Framework will take effect from 12 March 2025, except in cases where one or more of the following applies: the plan has achieved Regulation 19 (pre-submission stage) by 12 March 2025 and its proposed housing requirement satisfies at least 80% of local housing need. Indeed it is noted that neither the Cambridge Econometrics and the comparative Oxford Economics forecasts utilised in the scenarios prepared, reflect the planned delivery of the National Cybers Force headquarters in Samesbury. The supporting Local Housing Need Assessment prepared by Stantec considers this in detail, but concludes that an additional 1,500 employees from the headquarters could require housing in the area.
- 5.16. Paragraph 4.19 of the Plan, states that following the publication of the revised NPPF in December 2024 the annual housing requirement for Central Lancashire has been increased slightly to 1,314dpa in order to achieve 80% of the LHN using the new standard method formula, in accordance with the transitional arrangements. It suggests that the additional 77 dwellings needed to meet this 80% requirement has been distributed between the three authorities.
- 5.17. Simply put therefore, without justification or assessment, the Councils have arbitrarily added 77 dwellings to their requirement simply so that they don't get caught by the requirement to commence making a new Plan.
- 5.18. This very obviously goes entirely against the purpose of the transitional arrangements and flies directly in the face of the need to boost housing and is clear evidence that the Councils are not using the transitional arrangements in a way which the Government would consider appropriate.
- 5.19. Planning Practice Guidance (PPG) states that "an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes." Local authorities should therefore consider if the minimum housing need calculated using the standard method should be increased to accommodate more affordable housing.

- 5.20. Affordable housing need has become acute across the country as the affordability of housing has worsened over the past two decades.
- 5.21. The January 2022 House of Lords report 'Meeting Housing Demand' identified *"there were 1,187,641 households on local authority housing waiting lists in 2021"* and *"as of March 2021, 95,450 families had been placed into temporary accommodation by local authorities."*
- 5.22. Research for the National Housing Federation (NHF) and Crisis in 2018 identified a need for 145,000 new affordable homes per year, of which 90,000 for the next 15 years should be for social rent, 30,000 for affordable rent and 25,000 shared ownership homes.
- 5.23. At the outset, Marrons do not advocate that affordable need necessarily be met in full, given the judgment of Mr Justice Dove in the Kings Lynn case (High Court Judgment) , which concluded that neither the NPPF nor the PPG suggest affordable housing need must be met in full, however, aligned with the PPG guidance, it is appropriate to give additional consideration to boosting the supply of affordable housing through increasing overall housing requirements.
- 5.24. The Housing Needs and Demand Assessment (HNDA) was developed for all the Central Lancashire Authorities in 2022 which gives a net annual affordable need of 831 across the three authorities.
- 5.25. The report produced by Stantec Development Economics (on behalf of Taylor Wimpey and a consortium of other developers) identifies several shortcomings in the methodology used by Arc4 and makes adjustments to improve these estimates. The impact of these adjustments increases the net need for affordable housing from 831 to 1,364 dwellings per annum across Central Lancashire. Need generated by South Ribble and Chorley increases, and that from Preston decreases. This shifts the overall share of need sharply from Preston to Chorley.
- 5.26. The Chorley HDNA reveals an annual requirement for 113 affordable homes, suggesting a tenure distribution of 71% rental and 29% affordable homeownership. The Preston HDNA recognises a yearly requirement for 395 housing units, suggesting a tenure distribution of 76% rental and 24% affordable ownership. The South Ribble HDNA highlights a yearly requirement for 323 affordable houses, suggesting a tenure distribution of 77% rental and 23% affordable home ownership.
- 5.27. Following the robust identification and explanation of flaws with the approach taken by Arc4 in the HDNA, the Stantec Housing Need report adjusts the need for Chorley to 701dpa (+588).

- 5.28. As such, Marrons advocate an uplift as demonstrated in the Stantec report on an employment-led scenario and further suggest that it is appropriate given the significant soundness issues with the Plan as prepared, that the Council utilise the LHN 2024 figures as their baseline for calculating need.
- 5.29. The approach being taken is considered unsound, not justified, not effective, and certainly not consistent with national policy.
- 5.30. Based on the supporting reports prepared by the Consortium of developers that Taylor Wimpey are part of, we further consider that the Council will not be able to demonstrate a sufficient supply of housing upon adoption of the Plan. This is considered specifically in the closing remarks from the Consortium which concludes;
- “The Consortium is of the opinion, having reviewed the evidence published to support the emerging Local Plan, that the claimed housing land supply in the Plan is exaggerated and overestimates the quantum of development that it can accommodate over the plan period. Whilst we remain keen to see a development plan adopted it must only be adopted if it is sound. The Consortium is concerned with the approach taken to assessing the housing land supply (including the method by which sites were selected) and the conclusions drawn as to the level of housing that it will deliver”.*

6. Draft Polices

- 6.1. The section provides Taylor Wimpey's response to the emerging policies within the Local Plan. As is detailed below, we object to a number of the draft policies.

Policy SS2: Settlement Hierarchy

- 6.2. We object to this policy on the basis that it is not considered to be sound, not justified, not effective and not consistent with national policy.
- 6.3. We submit that further growth should be allocated to the tier 2 and tier 3 settlements to ensure the housing need figure, as is set out above, is delivered and to allow for greater flexibility. Offering a wider variety of sites to the market in varied locations across the CLLP area will provide greater certainty that the housing requirement will be met.
- 6.4. Whilst an approach to the appropriate use of brownfield and previously developed land is supported, with regard to wider regeneration aspirations however realistic timeframes have to be considered when projecting completions from such sites.
- 6.5. Covid-19 has changed home buyers' priorities with a recent Savills survey finding that 71% of younger buyers crave more outdoor space and rural locations. With this in mind we would also highlight the benefits of providing family housing, in sustainable locations. Taking this uncertainty over demand for urban dwellings into consideration, it seems logical that further allocations should be located such settlements.
- 6.6. There should be sufficient flexibility established within the identified settlement hierarchy to recognise that there are inconsistencies with assessment of the settlement hierarchy on the basis of Green Belt within the Plan area. Indeed, settlements that are located within or adjacent to the Green Belt, have had their position within the settlement hierarchy and growth attributed over the plan period, artificially reduced.

Site Allocations

- 6.7. Aligned with the above, we have concerns with a number of draft allocations and in particular are concerned that the Councils' will be overly reliant upon strategic allocations on brownfield sites coming forward. In particular 3 of the key strategic sites (covered under policies SS3, SS4 and SS5) have significant constraints which could realistically prevent, limit or at least delay development.

- 6.8. North West Preston/Bartle (SS3) is required to be brought forward having regard to the adjacent site and there remain considerable complexities associated with a need to accord with existing masterplan. It is essential that delivery of the site or indeed any application(s) does not prejudice the ability of the adjacent site to come forward in line with the permitted scheme. These issues are further complicated by the fact that there are multiple land owners involved in the scheme and land assembly including matters of equalisation, are likely to be significantly problematic when it comes to delivery. There is insufficient evidence provided to confirm that the site is achievable and deliverable as such. The Housing Land Supply report prepared by Stantec reduces the contribution that the site can make towards delivery in the plan period to 1,000 dwellings.
- 6.9. In reference to Fulwood Barracks (SS4), the Councils' assessment of the site identifies significant heritage assets on-site, this is considered in detail in the Stantec Housing Land Supply (page 25 Appendix B). These could reasonably reduce the net developable area considerably, and noting the aforementioned viability issues, prescriptive requirements in regard to design in and around the listed assets, could further reduce the ability of the site to deliver a policy compliant level of affordable housing. It is also noted that the North East of the site within landfill buffer zone.
- 6.10. As with North West Preston, Preston West (SS5) is within multiple landownership. Part of site has planning for a train station, there remains a Golf Club on site and overall, there is insufficient information to confirm that all landowners are committed to development of the site for residential purposes. Furthermore, the site is within functional flood plain and contains a number of listed heritage assets.

[Policy HS6: Housing Mix and Density](#)

- 6.11. We object to this policy on the basis that it is not considered to be sound, not justified, not effective and not consistent with national policy.
- 6.12. Draft Policy HS6 requires any market and affordable housing development proposals that will deliver more than 10 dwellings must: offer a variety of home sizes and types to meet the needs of the area as determined by the Housing Need and Demand Assessment; construct all homes to M4(2) standards; and construct at least 4% of affordable homes on sites in Preston and Chorley to M4(3) wheelchair accessible standards.
- 6.13. Although we endorse the need for a variety of sizes, types, and tenures, and support offering a range of homes to suit the needs of the surrounding area, Policy HS6

policy must, however, be practical and guarantee that the provision of housing will not be restricted or delayed by unduly restrictive requirements, such as requiring a mix that ignores the site's size or viability or that necessitates the applicant to prepare substantial amount of extra evidence. We would anticipate that additional flexibility can be established within the policy so as to allow for assessment on a site-by-site basis.

- 6.14. Furthermore, the Council should refer to the PPG's (ID: 56-007-20150327) criteria if it wants to adopt the higher optional standards for wheelchair-accessible, adaptable, and accessible dwellings. The probable future need, the size, location, type, and quality of the dwellings required, the accessibility and adaptability of the current stock, the ways in which the needs differ across various housing tenures, and the overall viability are among the types of evidence that the PPG identifies as being necessary to introduce a policy requiring the M4 standards. In order to support the inclusion of optionally higher standards for accessible and adaptable dwellings in the CLLP the Councils are required to present a local assessment that demonstrates the particular need for Central Lancashire. Impact on the viability of sites should also be given consideration, with the February 2025 Viability Report already suggesting within Chapter 6 that a number of types of development, particularly Brownfield development is already considered unviable.
- 6.15. We suggest that where reference is made within the draft policy to a minimum density additional flexibility is established within the policy and any density is set per net hectare as apposed to per gross hectare.
- 6.16. It is important to note that housing mix as identified in the Councils latest evidence base will only provide a snapshot in time in relation to the current housing needs. As such, the policy should provide for flexibility going forward so that the Plan is able to respond to changes in circumstances at the time of an application being submitted to the Local Planning authority so that development opportunities can make better use of the land available whilst responding to the housing needs at that time.

[Policy HS7: Affordable Housing](#)

- 6.17. Policy HS7 requires all residential developments of 10 or more dwellings to deliver affordable housing within a minimum of 30% in Preston; the Key Service Centres; and the Urban Local Service Centre, and a minimum of 35% on sites in all other locations. The policy also provides a tenure split for the affordable homes, which differs slightly from 71% social rent and 29% affordable home ownership in Chorley; to 52% social rent, 24% affordable rent and 24% affordable home ownership in

- Preston; to 45% social rent, 32% affordable rent and 23% affordable home ownership in South Ribble.
- 6.18. Taylor Wimpey supports the Council in its pursuit of securing affordable housing to meet the needs of local communities across the borough. The Framework is clear that the delivery of affordable housing should account for both need and the effects on development viability.
- 6.19. As a general observation the targets between 30 and 35% seem high given the underlying residential sales rates experienced. In addition to more detailed appraisals forming part of the viability evidence base (including how each of the assumptions are being applied), it is not currently clear what underpins the conclusion in regard to affordable housing need.
- 6.20. Notwithstanding this, the CLLP's spatial strategy and indeed allocated sites, through an over reliance on brownfield and a small number of SUE's is likely to result in a reduction in the provision of affordable housing delivered across the Plan area as a whole.
- 6.21. Taylor Wimpey welcomes the flexibility to provide an alternative tenure split if it can be independently proven, this policy would benefit from a required range, rather than specific percentages, to provide reasonable flexibility and allow site specific considerations to be accounted for.
- 6.22. We observe the notable viability issues highlighted in section 6 of the Viability Report (Feb 2025). Marrons observes that the Lower Value Brownfield types, lower value greenfield types, and the Preston City Centre types are unviable; while the medium value brownfield types, medium value greenfield types, higher value brownfield types, and higher value greenfield types are either unviable or marginal when assessed against a framework of fully policy compliant appraisals, realistic land values, and a 20% profit. Further it is
Noted that several viability issues persist even in the 'pragmatic scenario'. The Viability Report explicitly states that *"all types within the lower value zones are unviable, as are all types evaluated within Preston city centre, where elevated construction costs and site limitations create challenges to viability."*
- 6.23. Against a backdrop of an urgent need for affordable housing across the Plan area, this highlights the importance of allocating a variety of sites, including sustainable sites within the Green Belt and Open Countryside. The Councils' key objective to regenerate urban areas is applauded but should not undermine the wider need to deliver housing to meet the needs of a variety of groups within the area.
- 6.24. As stated above in Section 5 we are concerned that the Plan as proposed will not meet the affordable housing need, as set out in the HDNA. Again, we ask the

Councils to consider increasing the housing requirement to help to address this need as set out in the PPG (ID: 2a-024-20190220). Aligned with our wider comments on an over-reliance on strategic brownfield sites it is also recommended that the Councils look again at their Plan and spatial strategy, for example, if more sites were allocated in areas where the viability is greater, this would help to increase the level of affordable housing provided.

- 6.25. **Comment on required FVA if deviating from proposed mix along the lines of:** In order to support sustainable development, it should be clear that deviating from the proposed housing mix or tenures does not require a Financial Viability Assessment, as long as other strong market evidence is provided.

Policy EN1: Well Designed Places

- 6.26. We object to this policy on the basis that it is not considered to be sound, not justified, not effective and not consistent with national policy
- 6.27. Policy EN1 indicates that major applications, incorporating residential uses, must demonstrate how they will satisfy the requirements of Building for a Healthy Life and are expected to receive a green light for every question.
- 6.28. It further specifies that every new residence must adhere to the nationally defined space standards and elevated water efficiency standards (equal to 100 liters per person per day). It further indicates that all development must align with national and any locally adopted design codes, as well as guidelines like the Central Lancashire Design Guidance.
- 6.29. Taylor Wimpey is concerned that the Council anticipates significant advancements to secure approval for each of the Building for a Healthy Life criteria. We wish to point out that the Building for a Healthy Life document indicates that situations may arise where amber lights are unavoidable, and that a project only requires nine green lights to receive a commendation and to utilize the Building for a Healthy Life logo. We thus suggest amending this policy to eliminate the necessity for all green lights and to more accurately represent this guidance
- 6.30. Whilst the pursuit of high quality design is applauded and understandable, it is essential that the Council avoid overly prescriptive and detailed design policies being included in the Local Plan The Council will need to consider this, alongside any viability implications of the requirements set under this policy.
- 6.31. *Comment on Part 4: "Significant schemes will be required to provide a Masterplan, parameter plans, and a design code in support of their application" which needs further refinement, what is 'significant schemes' – strategic site allocations? Sites of 500+? Note it is disproportionate for sites of certain smaller sizes.*

Policy EN8: Trees, Woodlands and Hedgerows

- 6.32. Policy EN8 states that where it has been demonstrated by the applicant that there will be an unavoidable loss of trees and / or hedgerow in order 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.
- 6.33. We are concerned by the potential tree ratio and hedgerow replacement strategy provided, this could have significant potential implications in terms of viability of the development, not only due to the tree and hedge provision costs but also in terms of efficient land use, site layout and highways considerations.

Policy EN15: Areas of Green Belt

- 6.34. We object to this policy on the basis that it is not considered to be sound, not justified, not effective and not consistent with national policy.
- 6.35. Policy EN15 states that the NPPF (Dec 2023) para 154 outlines a definitive list of development types that are deemed acceptable within the Green Belt. The policy subsequently establishes local criteria regarding how the Council will evaluate these types of developments. Although we acknowledge that the transitional arrangements could be relevant to this Local Plan, it seems illogical to incorporate a policy that will become obsolete immediately upon its adoption. This policy will undoubtedly be replaced by the 2024 NPPF policies regarding inappropriate development in the Green Belt. We highly suggest that this policy be removed
- 6.36. **Draft Policy ID2: Developer Contributions and Planning Obligations**
- 6.37. Taylor Wimpey acknowledge that contributions are required to facilitate development however it is critical that the level of contributions are reasonable and proportionate to the development (NPPF paragraph 35).
- 6.38. Policy ID2 states that a monitoring fee will be charged by the Council to cover the cost of monitoring and delivery of S.106. It is imperative that the monitoring fees are fair and reasonable, and the sum paid cannot exceed the authority's estimate of its costs for monitoring over the lifetime of the planning obligation (Regulation 122 (2A))

of the CIL Regulations 2010). Recognition of the specific requirements of the CIL regulations should be referenced within Policy ID2.

7. Land at Euxton Lane, Chorley

- 7.1. Taylor Wimpey are promoting land at Euxton Lane, Chorley. It is expected that the site can deliver between 750 and 800 new homes. A copy of a bespoke Vision Document highlighting how the site could be delivered is provided as Appendix A.
- 7.2. The property at Euxton Lane, Chorley, is situated east of Euxton and directly south of Buckshaw village on the northwestern fringe of Chorley. The location is situated very next to the district centre at Buckshaw Village and a number of important job prospects.
- 7.3. To the north of the site is the Buckshaw Parkway Train Station, which provides regular services to Manchester, Preston, and Chorley. Wigan is connected to Euxton Station, which is situated to the southwest. Euxton Lane is home to several bus lines. Schools, supermarkets, and medical facilities are just a few of the important services and facilities that are close to the site.
- 7.4. As a result, the site is a suitable and sustainable place to deliver dwellings. To guarantee that Chorley and the larger Plan area exploit the potential for economic growth, new housing should be situated to the northwest of the town where it can take advantage of the existing rail and larger public transport network as well as connections to the strategic road network.
- 7.5. The site is located within the Green Belt. However, in-line with the provisions set out in the NPPF24, we consider that the site meets the tests of Grey Belt and accords with the requirements of the Golden Rules. A Grey Belt Assessment is provided at Appendix B.
- 7.6. Initial due diligence indicates that the subject site is suitable for both allocation and the granting of planning permission and that there are no technical impediments that would prevent the site from coming forward for residential development.
- 7.7. The site is located within Flood zone 1 and is considered to be at a low risk of flooding. It is expected that hydraulic modelling (rain on grid) will address the surface water puddling shown across the site. It is however noted that build form, including access and egress can be kept outside of surface water flow-paths. As such, mitigation, likely in the form of attenuation is expected to address all surface water constraints and will further potentially offer a wider betterment and address existing highways flooding.
- 7.8. There are no Listed Buildings within the development of the site and initial due diligence confirms that development of the site will not give rise to any unacceptable heritage issues. The site is not located within a Conservation Area.

7.9. Given the Green Belt status of the site, the Council have not considered the site as part of the IA process. As such, based on the criteria set out in the IA, we have considered the site against the 16 IA criteria. Notably, the site performs better in a number of areas, including against health and biodiversity and geodiversity that the majority of proposed allocations in Chorley.

Table 3: Assessment of the site against IA Criteria

Integrated Assessment Criteria	Score
IA1: Housing	+
IA2: Economy	N/A
IA3: Transport & Utilities	N/A
IA4: Deprivation	0
IA5: Equality	N/A
IA6: Health	+
IA7: Social Infrastructure	+
IA8: Education	+?
IA9: Sustainable Transport	+
IA10: Air Quality	0
IA11: Biodiversity and Geodiversity	+
IA12: Climate Change and adaptation	N/A
IA13: Flood Risk	0
IA14: Water	0
IA15: Energy and emissions	N/A
IA16a: Landscape	0?
IA16b: Heritage Assets	0
IA17: Resources	--?
IA18: Waste	0

7.10. We have undertaken a review of the socio-economic benefits to Chorley as a result of the proposed development as follows;



£4.6 million New
Homes Bonus



£1.1 million Additional
Council Tax Per Year



Ample provision of public open
space and Green Infrastructure



Creation of 1,082
new jobs



£6.5 million additional
retail expenditure



£3.2 million retail
expenditure retained locally



£49.8 million added to Chorley's
economy annually

Deliverability

- 7.11. The glossary to the National Planning Policy Framework (NPPF, 2023) confirms that in order for a site to be considered deliverable, they should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 7.12. The NPPF glossary also confirms that to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
- 7.13. The below therefore assesses the site in terms of its suitability, availability and achievability.

Suitability

- 7.14. The Planning Practice Guidance (PPG) confirms that a site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated (Paragraph: 018 Reference ID: 3-018-20190722).
- 7.15. It is considered that the site is a suitable location for development and would not only help to deliver Chorley's future housing requirements but could also assist in providing market and affordable housing in an area in need of further regeneration

and housing growth. Development on the site would lead to the creation of a sustainable community.

- 7.16. The nature of the site and the individual characterises of the area indicate that there are very few identified physical or environmental constrains to future development. It can be demonstrated that there is adequate road infrastructure and service infrastructure to accommodate further development in the locality.
- 7.17. The site is within close proximity of the centre of Chorley. It is well served by a number of bus services and facilities, including a local schools and shops.
- 7.18. The site is therefore considered suitable for residential development.

Availability

- 7.19. The PPG states that a site can be considered available for development, when, on the best information available, there is confidence that there are no legal or ownership impediments to development. The land is controlled by a landowner, who has entered into an option agreement with the applicant who intends to develop the site as detailed in this application. (Paragraph: 019 Reference ID: 3-019-20190722).
- 7.20. The site is controlled by Taylor Wimpey who are committed to the development of the site, and as such, the site is considered to be immediately, available, achievable and deliverable and as such, we consider that the Council should seek to allocate the site for development without delay.

Achievability

- 7.21. The PPG confirms a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period (Paragraph: 020 Reference ID: 3-020-20190722).
- 7.22. There are no known/overriding technical constraints that are expected to give rise to any viability concerns.

8. Summary & Conclusions

- 8.1. These representations have been prepared by Marrons on behalf of Taylor Wimpey in response to the ongoing Regulation 19 consultation on the Central Lancashire Local Plan 2041.
- 8.2. This report provides responses to draft policies relating to the spatial strategy, scale and distribution of housing and housing provision. Alongside this report, site specific representation and relevant policy comments are provided in respect of Taylor Wimpey's land interest at Euxton Lane, Chorley.
- 8.3. We object to a number of the draft Policies contained within the Publication version of the Central Lancashire Plan. In their current form, they cannot be found sound at Examination.
- 8.4. We consider that the Integrated Appraisal process is totally flawed, to the extent that it is unlawful, as it does not meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 ("the SEA Regulations").
- 8.5. There has been a failure to consistently and robustly consider reasonable alternatives contrary to Regulation 12 and Schedule 2, paragraph 8. As such we do not consider that the Plan is capable of being found sound.
- 8.6. We consider that at present the Councils' have not engaged sufficiently with neighbouring authorities, and on the basis of the available information would fail the test of the Duty to Cooperate.
- 8.7. We recommend that the Councils immediately pause submission of the Plan to the Secretary of State and any further preparation for Examination in Public. The Councils should undertake the additional work required to achieve a Plan capable of being found sound. If the Councils opt to submit the Plan irrespective of outstanding objections in respect of legal compliance, duty to cooperate and soundness, the Inspector(s) should determine that the Submission Version Plan has not satisfied the relevant legal requirements and tests of soundness within national policy. The Plan is not capable of being found sound, subject to Modification. This is only achievable through the full assessment and reconsideration of sites and settlements across the Plan area, including our clients' land interests set out within this submission.

Appendix A – Vision Document

Euxton Lane, Chorley

Vision Document

Taylor Wimpey | Revision B | February 2023



Residential Development at Euxton Lane, Chorley

Executive Summary

Appropriate Location for Housing

Situated in close proximity to Buckshaw Village Centre, local employment provision, a college and the Buckshaw Parkway (BSV) railway station opened in 2011. The site is also located close to the M6 and M61 motorways.

Sustainable Location, with accessible walkable neighbourhoods

New areas of public open space and new ecological areas will be provided onsite. Delivering new space for recreation and play.

Delivering New Parkland

A new Parkland area to the south of the site can bring benefits for health and well being. The site can deliver a net gain for biodiversity. The existing habitats onsite will be retained where possible and enhanced.

Economic Benefits

The delivery of new homes is recognised as important to supporting employment and economic growth. The Euxton Lane site will contribute to the economic growth of Central Lancashire.

Based on the site delivering 760 homes it is estimated that there will be 1,140 Direct and 1,520 Indirect Full Time Equivalent (FTE) Jobs associated with the site. These jobs will provide a Gross Value Added (GVA) of approximately £54m. In addition, it is considered that the new households will spend £18.82m annually in the local area.

Encouraging Healthy Travel to Work

The development would provide pedestrian and cycle connections throughout the site and to the wider area.



Over £50m of Gross Value Added invested into the local economy



Meeting the strategic need for new housing in Central Lancashire



Creation of enhanced green spaces and ecological area



W



The si



Buckshaw Village District Centre

Buckshaw Parkway Rail Station

Euxton Lane

Chorley

Indicative Masterplan by e*SCAPE urbanists

When fully developed, the scheme is anticipated to have created up to **2,660 new jobs**

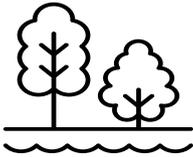
Encouraging healthy travel

Site is located within a **10minute walk** of **Buckshaw Parkway** train station

Proximity to local amenities and employment

Benefits

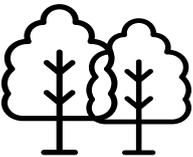
Environmental



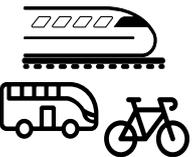
Opportunity to assist achieving net zero target by 2030



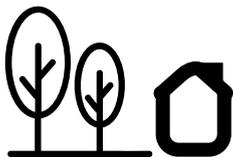
Creation of new and enhanced habitats
Delivery of Biodiversity Net Gain



Increased tree coverage and nature recovery



A sustainable location to use existing services to reduce reliance on the private car

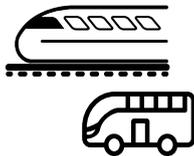


Climate resilient development

Social



Up to 760 new homes to meet the housing needs of Central Lancashire



Encouraging active travel from sustainable transport options within Chorley and Euxton

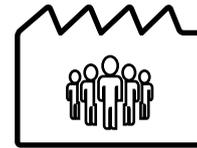


Linking with active travel routes from the local area to encourage healthy journey patterns



1,140 direct construction jobs and approximately 1,500 indirect jobs within the supply chain

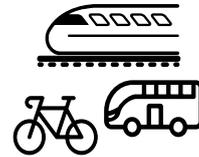
Economic



Close proximity to existing employment provision at Buckshaw



Supporting economic growth in the region



Sustainable transport options connecting the site to the wider area



Over £50m of Gross Value Added invested into the local economy



£5,000 1st home expenditure per new home created

Introduction

This document illustrates the Vision for the Euxton Lane site, and seeks its allocation as a housing scheme within the Central Lancashire Local Plan. The development is proposed to deliver new high quality housing set within landscape led setting, delivering significant public open space, meeting the housing needs of Chorley in a healthy environment and highly accessible location.

About Taylor Wimpey

Taylor Wimpey is a dedicated home building company with over 125 years experience. They have an unparalleled record in the housing industry and aim to be the homebuilder of choice. Taylor Wimpey have an enviable track record delivering homes and communities across the UK, delivering over 10,000 homes per annum. Strategic Land division of the UK business is responsible for the promotion of future development opportunities, such as this site.

Taylor Wimpey's purpose is "to build great homes and create thriving communities". Taylor Wimpey have a focus on improving environmental performance, fostering community networks, supporting local economic activity and helping customers adopt a more sustainable lifestyle. Taylor Wimpey through strong placemaking principles seek to deliver schemes that promote social, environmental and economic sustainability and well-being of future residents.

Euxton Lane, Chorley

The Euxton Lane site creates a unique opportunity to co-locate housing in a sustainable location close to existing services, existing and future employment opportunities, facilities and public transport routes. The proposed scheme can deliver high quality development meeting strategic and local needs, within a landscaped setting adjacent to an existing green network, creating a healthy lifestyle.

Delivery of the site can also assist in the transformation in the pedestrian and cycle environment along Euxton Lane. Development offers the potential to support improvements in pedestrian and cycle links between Chorley, Astley Village, Euxton and Buckshaw as well as secure for the long term future and management of a 'strategic gap' to the south of the site.

Scope

This Vision sets out the context and ambitions for Euxton Lane before analysing and explaining the sites availability, suitability and achievability and therefore deliverability in the context of the National Planning Policy Framework (the Framework)

The vision sets out the masterplan principles for the site. The indicative masterplan will show the potential for the site including green and blue infrastructure, movement and connectivity, and sustainability. The proposal provides significant benefits which are set out throughout the Vision document, including the provision of a range and choice of new high quality homes.

Why Euxton Lane?

Euxton Lane is located in a sustainable location at the edge of Chorley, which is a Key Service Centre, and adjacent to Buckshaw Village and is a focus for regional investment within the existing Core Strategy. The site is in a highly sustainable location within walking distance of shops, services and employment opportunities and with access to excellent strategic road and rail links.

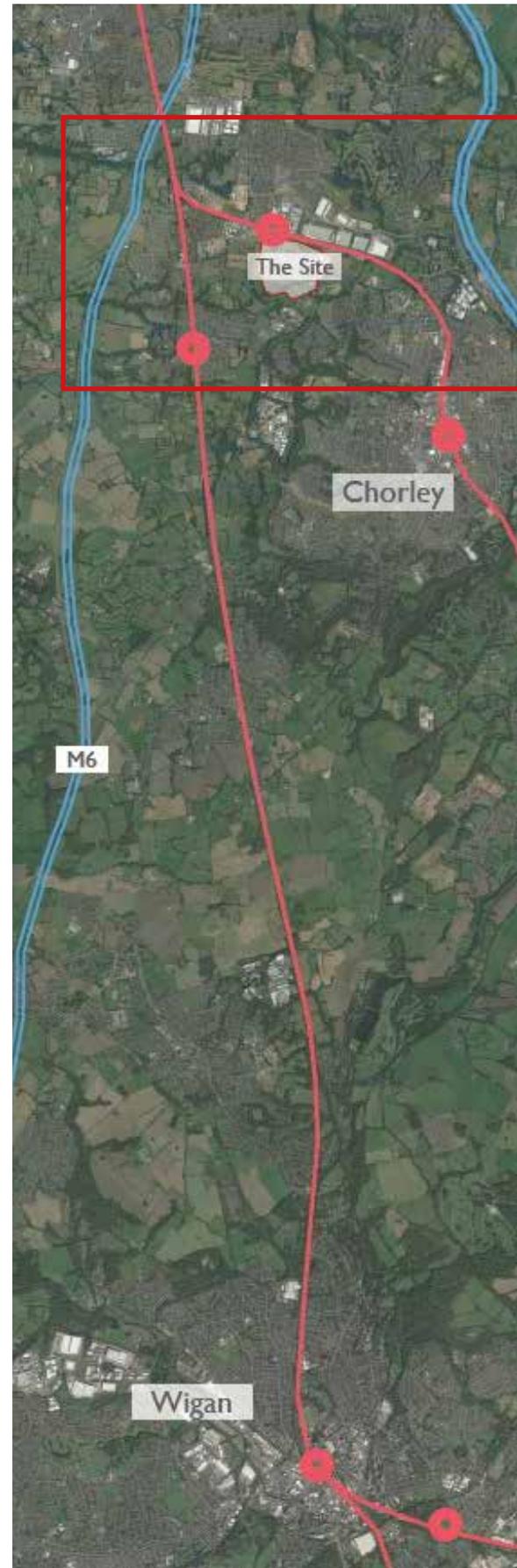
Lancashire and Central Lancashire form an important part of the Northern Powerhouse and is a key economic sub region within the North West and the wider north of England. It holds a “leading national and regional position in relation to Aerospace, Advanced Engineering and Manufacturing, Automotive, Energy and Higher Education”, sectors that will be key to the long term sustainable growth of the North’s economy.

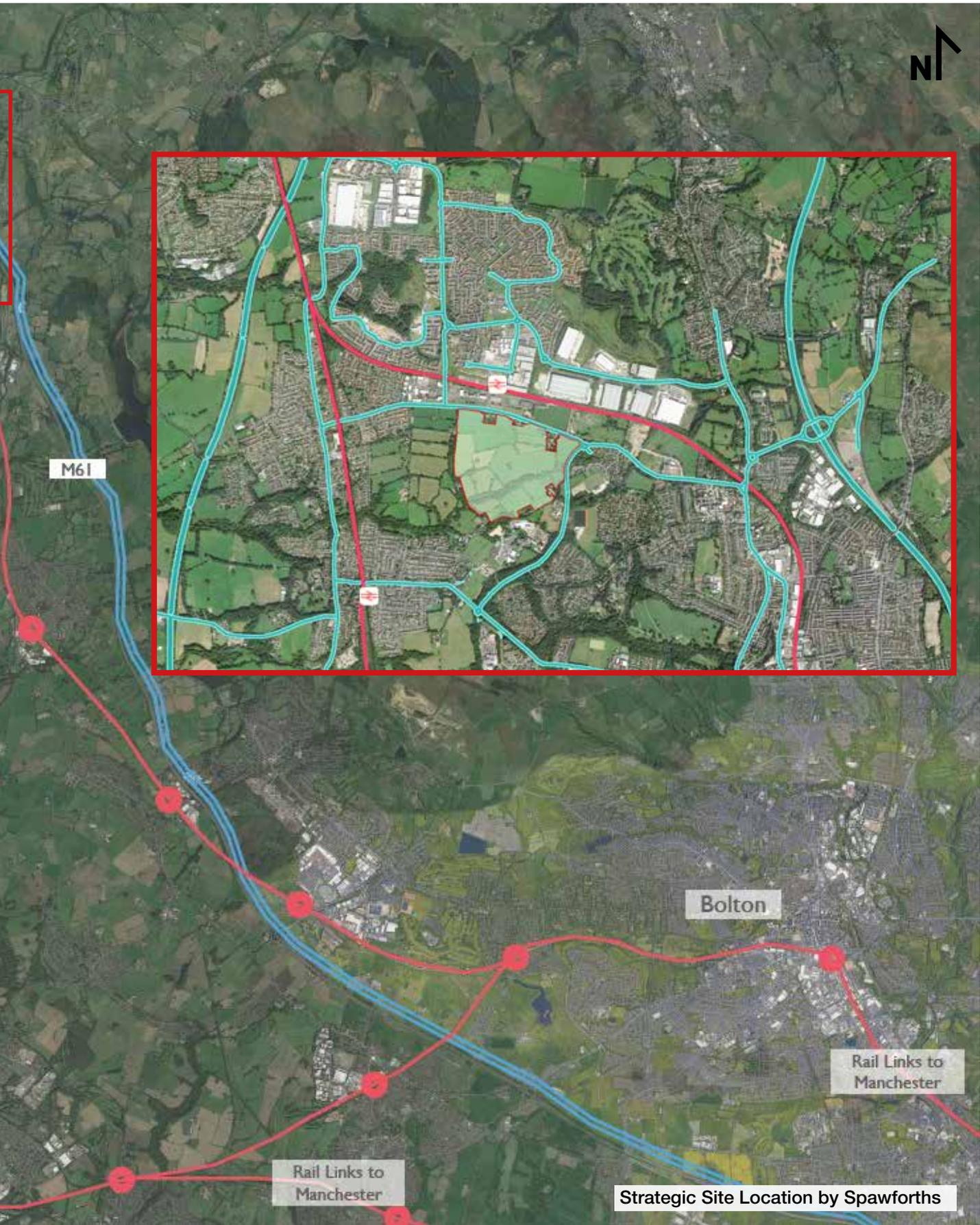
Chorley has a functional economic link with Greater Manchester and benefits from indirect growth as a result of City Deal and Enterprise Zones. Chorley has very good links with Greater Manchester and the Liverpool City Region. Chorley is directly north of Bolton and Wigan with direct motorway links connecting Chorley with Greater Manchester.

Chorley is highly accessible being in close proximity to the M6 and M61 motorways, three railway stations at Chorley, Buckshaw Parkway and Euxton Balshaw Lane, regular bus services, and cycle and footpath routes.

Sustainable Location of Euxton Lane

The land to the south of Buckshaw Village is uniquely placed between two key transport corridors of the M6 and M61. There are significant employment opportunities at Buckshaw Avenue and on the land north Euxton Lane. The area is served by an abundance of sustainable transport options including a network of footpath and cycle infrastructure, park and ride and two train stations. New housing development in this location would build upon and support the existing growth at Buckshaw Village and enable sustainable commuting patterns.





Historic Settlement Growth

The settlements of Chorley, Euxton and latterly Buckshaw village have benefitted from the proximity of extensive rail infrastructure. The construction of the M6 and M61 in the mid twentieth century accelerated growth for Euxton. The strategic location of the Royal Ordnance factory to the north of Euxton Lane, proved equally attractive for housing developers and as of 2022, 3000 new homes have been constructed together with a district centre, sports pitches, a primary school and medical centre

1840

The 1840 plan shows the two rail lines, with development in Chorley focused on what is now the A581.

Euxton is a ribbon development focused on Wigan road which runs north south in parallel with the railway. Central Road, now Central Avenue, forms a junction with Euxton Lane and crosses the rail line, in its current location.

Whinney Lane, Washington Lane and Pear Tree Lane give access to agricultural holdings.

1890

By 1890, a second rail line to Chorley from the east, appears to be facilitating new development to the east. Euxton has seen very little growth.

1920

Chorley has continued to expand to the south and east.

1950

Chorley has continued to grow, to the south west with denser development towards the centre. Euxton has small scale developments focussed on Wigan Road.

1980

The M6 to the west of Euxton is the first motorway to open in England, incorporating the Preston By-pass in 1958. It starts in Rugby and connects Birmingham with Carlisle, passing Manchester and Liverpool en route.

Constructed between 1969 and 1970, the M61 links Manchester with the M6 and M25 near Preston and Blackburn. Excellent strategic highway connections, appear to have facilitated huge growth for both Chorley and Euxton.

1990

The Royal Ordnance Factory in Chorley was the site where the bouncing bombs designed by Barnes Wallace were filled in advance of the famed Dam busters raid, in WW11. ROF Chorley had its own railway line and station. The administration buildings fronted Euxton Lane and these have been retained and re-purposed as Runshaw College.

Until the mid 1990s, in the interests of security, British Ordnance Survey maps omitted the ROF sites and showed the location as it had been before the ROF construction. The factory closed and was demolished and decontaminated between 2005-2007 and the land sold to create Buckshaw Village.

The masterplan site is the next logical extension to the settlement.



1890



1960



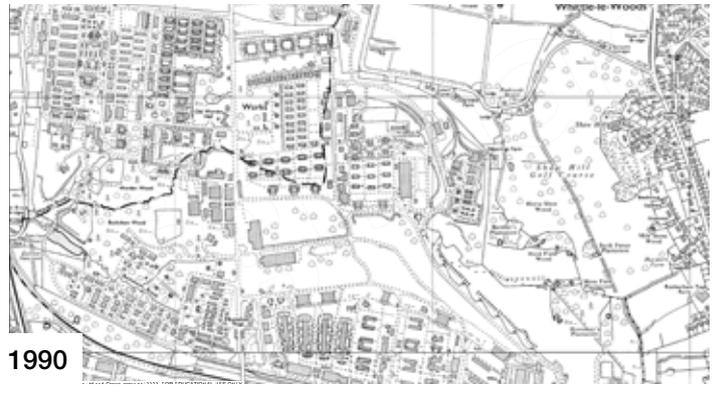
1920



1980



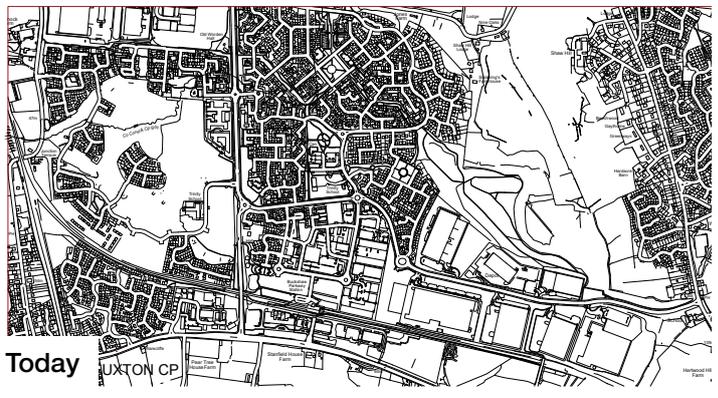
1950



1990



1980



Today

Historical Mapping - Chorley

Historical Mapping - Buckshaw Village

Settlement Analysis

The masterplan area contains a patchwork of agricultural fields bordered by hedgerows, woodlands and trees. The fields are used for both livestock grazing and silage cropping. The site is bound by Euxton Lane to the north, West Way to the east, Washington Lane to the south and Whinney Lane to the east.

Access from the site to the established Buckshaw Village is via Euxton Lane, Central and Buckshaw Avenue for vehicular traffic. Pedestrian and cyclists can use the footpath/cycleways along these roads but can also cut through the open spaces along Central Avenue to reach the railway station and village centre.

Pedestrian links primarily are alongside roads or on country lanes such as Whinney Lane or Washington Lane. These country lanes are relatively quiet and offer potential active travel routes to both pedestrians and cyclists. There are no Public Rights of Way (PRoW) across the site but there is a PRoW to the west (9-14-FP21) which connects Whinney Lane to Pear Tree Lane about half way along the western boundary of the site.

The topography is rolling with the site bisected by German Brook which sits in a shallow, but steep sided wooded valley and runs north-east to south-west across the site.

A series of fields ponds are located within the field network, some are adjacent to hedgerows and others appear to be set into the middle of fields. The latter ponds would have been associated with a field boundary prior to their removal as part of the agricultural intensification of the land. These field ponds most probably would have been excavated for their marl to improve the soil on the fields and would have formed part of the land drainage network with linking ditches, some of which are still visible today whilst others have been culverted.





Site photographs

Constraints and Opportunities

The Euxton Lane site has many landscape assets which offer opportunities to retain and enhance these features in a landscape led masterplan proposal. The site is ideally located to create an achievable and deliverable solution for providing new homes in a sustainable location. The development provides a great opportunity to enhance sustainable travel routes and encourage healthy modes of travel in the wider region.

Connectivity

The site lies to the south of Euxton Lane and is in close proximity to the Runshaw College, employment opportunities, Buckshaw Village Centre and Parkway Station. The site has good connectivity to the wider area, including along Euxton Lane but also via West Way and surrounding lanes.

National Route 55 utilises the cycle lane along Euxton Lane and connects the site to Chorley and Leyland.

There are opportunities to enhance footpath and cycle connectivity through the site and also onwards towards Buckshaw Village Centre and Parkway Station. This could include, subject to feasibility, a potential new pedestrian railway bridge crossing.

Flood Risk / Drainage

There is some localised surface water flooding on the site which relates to the areas containing field ponds, locations that appear to have been former field ponds and former hedgerow/ditch locations. The masterplan will take account of these natural drainage runs by integrating them into the blue and green infrastructure as part of the sustainable drainage network.

Overhead LV Cables

There are some low voltage powerlines which cross the site on poles. These can be diverted underground as part of the development.

Euxton Lane Corridor

The site fronts onto Euxton Lane and West Way which are main roads in the local area. A landscape buffer has been allowed for in the masterplan and properties shall front onto these road corridors to reduce noise levels in rear gardens. Properties in such locations shall integrate acoustic

detailing into their elevations to mitigate any noise impacts internally. The landscape buffer will mitigate air quality issues from the traffic.

Two listed buildings are located adjacent to the site. The first is the barn at Stansfield House Farm on Euxton Lane and the second is Broxops Farm on Whinney Lane. Landscape buffers with appropriate planting for the setting of these heritage assets shall be developed on the site adjacent to these properties to ensure their setting is safeguarded.

Ecology

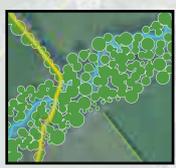
The woodlands, watercourses, hedgerows and field ponds create a strong network of green infrastructure assets across the site and shall be retained where possible. The masterplan shall take on board existing ecological corridors and build them into the green infrastructure network of the site to ensure the corridors are retained and better connected with enhanced habitats as part of the proposals.



KEY



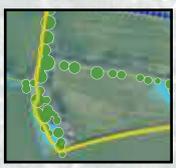
Redline - masterplan boundary



Existing woodland and trees



Overhead LV power cables



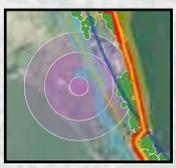
Existing hedgerows



Flood risk zones and wet areas



Bus stops



Listed buildings and suggested development offsets



National Cycle Route 55

The Vision for Euxton Lane

To create a new sustainable neighbourhood that will deliver social, environmental and economic benefits and improve the quality of life for its local population.

The site to the South of Euxton Lane will meet the criteria of a 20 minute neighbourhood as it is;

- In close proximity to sustainable transport hubs such as train stations, park and ride, walking and cycling network.
- In close proximity to employment, training and education opportunities at Buckshaw Hall including Runshaw College, Euxton and Chorley to the South all of which are accessible via sustainable transport options.
- In close proximity to the centres of Buckshaw Village, Euxton and Chorley centres.
- The land is in close proximity to medical centres in Buckshaw Village and Euxton as well as Chorley and South Ribble Hospital to the east.
- There are numerous childcare facilities, parks and community venues with close proximity to the site, and;
- The site has Spaces and Places for active lives accessible nearby, the proposed development site will also deliver a new parkland to improve the neighbourhood for nearby residents.

The site is uniquely placed to take advantage of the sustainable transport links to Sustrans Cycle Route 55, Buckshaw Parkway Rail Station and the strategic highway network in the close vicinity. Development of the site could offer betterment of active travel routes, with the potential provision of a railway footbridge link, giving direct access to Buckshaw Parkway for residents to the south of the station and students of the nearby college.





Green Connections

Housing Need

There is a significant and recognised housing crisis within the UK. The country needs to provide around 300,000 homes per year to keep up with population growth and to start to tackle years of undersupply. The LHN for Chorley is 542 dwellings per annum. Housing Provision over the Local Plan period should be maintained within Chorley to support planned future economic growth.

The Framework states that local authorities should meet their objectively assessed housing needs in full and to boost significantly the supply of housing. The emerging Local Plan and evidence base recognises the need to deliver a sufficient supply of housing to support economic growth and create sustainable communities.

The wider economic context in the country is also relevant. The delivery of housing has been seen as important to supporting economic recovery post Covid. Housing growth remains high on the Governments priorities. The Governments policy agenda through the Framework, ministerial statements and budgets and white papers recognise the importance of housing and the significant economic imperative of encouraging new development proposals. The importance of housing for economic growth is recognised locally through the LEP Strategies and emerging Lancashire 2050 Strategic Framework themes.

Lancashire and Central Lancashire form an important part of the Northern Powerhouse and is a key economic sub region within the North West and the wider north of England. It holds a “leading national and regional position in relation to Aerospace, Advanced Engineering and Manufacturing, Automotive, Energy and Higher Education”, sectors that will be key to the long term sustainable growth of the North’s economy.

Central Lancashire forms a key part of Lancashire’s economic offer, with significant investment through City Deal and the National Cyber Force Campus. Chorley and Buckshaw have attracted significant investment with Buckshaw village recognised a key focus within the Central Lancashire Employment Study opportunities, and is an area of continued demand for employment.

The Lancashire Strategic Development and Infrastructure Plan, June 2020, identifies Chorley and Buckshaw as having Key Development Sites, and Innovation Centres. In order to maximise the economic growth potential in Chorley it will be essential to ensure that the right types and tenures of homes are provided to support the business.

The Government’s current standard methodology for calculating local housing need, indicates that Chorley should provide 542 homes per annum. However this does not consider the effects of ‘Policy On’ economic growth, or fully address affordability issues. It is at a level which sits below the average delivery since 2014/15 which has averaged at 575 dwellings per annum. Recent evidence by DLP considers that it is broadly consistent with CE employment forecasts.

Horstead Park



However, it is noted that these are baseline forecasts and do not reflect the emerging Lancashire 2050 Strategic Framework, and investment schemes such as the National Cyber Force Campus expected to create 2,000 jobs plus additional jobs in the supply chain.

Furthermore Chorley currently cannot demonstrate a five year supply of housing, and recent appeals have also confirmed that there is an acute shortfall in affordable housing provision.

The development of new housing will bring forward additional economic benefits to Chorley and Buckshaw. The relationship between economic performance in an area and housing is complex but having

the right quantity and quality and balance of housing in an areas is necessary for economic growth. The development of new housing can therefore support local economic growth both through direct job creation through the construction, but also through the increased population which will create sustainable local jobs from the increased demand for services, and provide an important supply of workforce within an ageing population. This provides an important development opportunity for Chorley.

Euxton Lane is located in a sustainable location at the edge of Chorley which is a Key Service Centre, and adjacent to Buckshaw Village (currently identified as a strategic site), and is a focus for regional investment within the existing Core Strategy. Benefiting from excellent transport connections and proximity to existing and new employment opportunities, as indicated in the site suggestions within the emerging local plan. The site therefore represents an opportunity to provide quality housing in a sustainable location to help meet the housing needs of Chorley.

Available and Suitable Site

The site at Euxton Lane is available for development in the short term. It is in a suitable location and is eminently achievable. It is therefore deliverable in accordance with the National Planning Policy Framework. The site and access is controlled by Taylor Wimpey. The design has been determined by an expert technical team to ensure the deliverability and viability of the scheme.

Available

The development proposals are being promoted by Taylor Wimpey, who have a legal agreement with the landowners to allow the land to be brought forward for development.

Taylor Wimpey are a well-funded developer with a strong demonstrable track record of delivery of homes and sustainable places, with investment nationally. They are committed to develop the site and have appointed a technical team to provide the resource, expertise and experience to deliver.

Taylor Wimpey will work alongside the council to formulate the detailed proposals and deliver across the whole of the site area.

The land is therefore “available” in accordance with the Framework and the Planning Practice Guidance (PPG).

Suitable

The site at Euxton Lane, Chorley lies directly adjacent to the southern edge of Buckshaw Village in close proximity to local village services, employment opportunities and sustainable transport options. The site is therefore a logical sustainable site, whilst creating a new parkland and publicly accessible green spaces.

Buses and trains are available within ten minutes walking distance, providing services to nearby towns across the district.

The scheme has been designed to be a “walkable neighbourhood” with everything required within easy walking distance. Cycling will be encouraged and the site can connect into existing cycleway connection to rail station.

The brook to the south and retained ecological areas will provide a new park for recreation for new residents and the wider area.

Washington Lane and Winney Lane to the south and west are green corridors with low car use, which offer opportunities for active travel routes.

The site and proposals are therefore suitable in accordance with the Framework and Planning Practice Guidance. The development will provide new homes that will benefit Chorley and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable.



Potential Site Area by Spawforths

Achievable

It is considered the site is highly accessible by sustainable modes of transport, which are also usable by those with limited mobility and are wheelchair accessible. The surrounding area exhibits adequate levels of pedestrian and cycling infrastructure, and there are a number of public transport opportunities within acceptable walking distance of the site.

Access

The proposed site is in a strategic location for access to key road networks within Lancashire. The M6 and M61 are within easy reach of the local highway network.

Buckshaw Parkway Rail Station lies to the north of the site and has regular services to Blackpool North and Manchester, as well as services to Wigan, St Helens and Liverpool.

Curtins Consulting have produced an access strategy for the site which has two points of access to ensure sufficient capacity is available at the two new junctions.

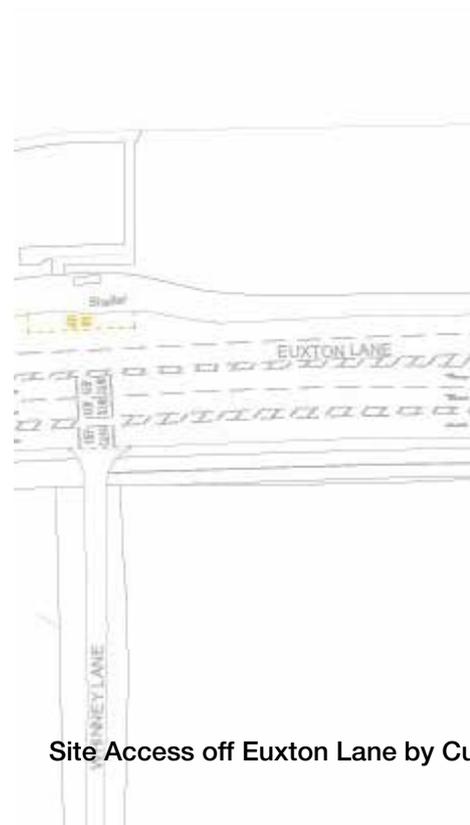
The Euxton lane, Whinney Lane priority junction moves eastwards. The existing Whinney lane junction could be stopped up to vehicular traffic, maintaining access for pedestrians and cyclists, whilst having no detrimental impact on access into existing properties on Whinney Lane.

A second point of access is proposed for West Way. Curtins note that the primary proposed Euxton Lane- West Way spine road through the site, should not be a continuous through route for all vehicles, avoiding the potential for a rat run.

National cycle route 55 utilises the existing cycle infrastructure on Euxton Lane. The route connects the site to Chorley and Leyland.

The station is within cycling and walking distance of all dwellings within the proposed development.

With its excellent strategic location, the development is ideally placed to contribute to and develop active and sustainable travel routes.

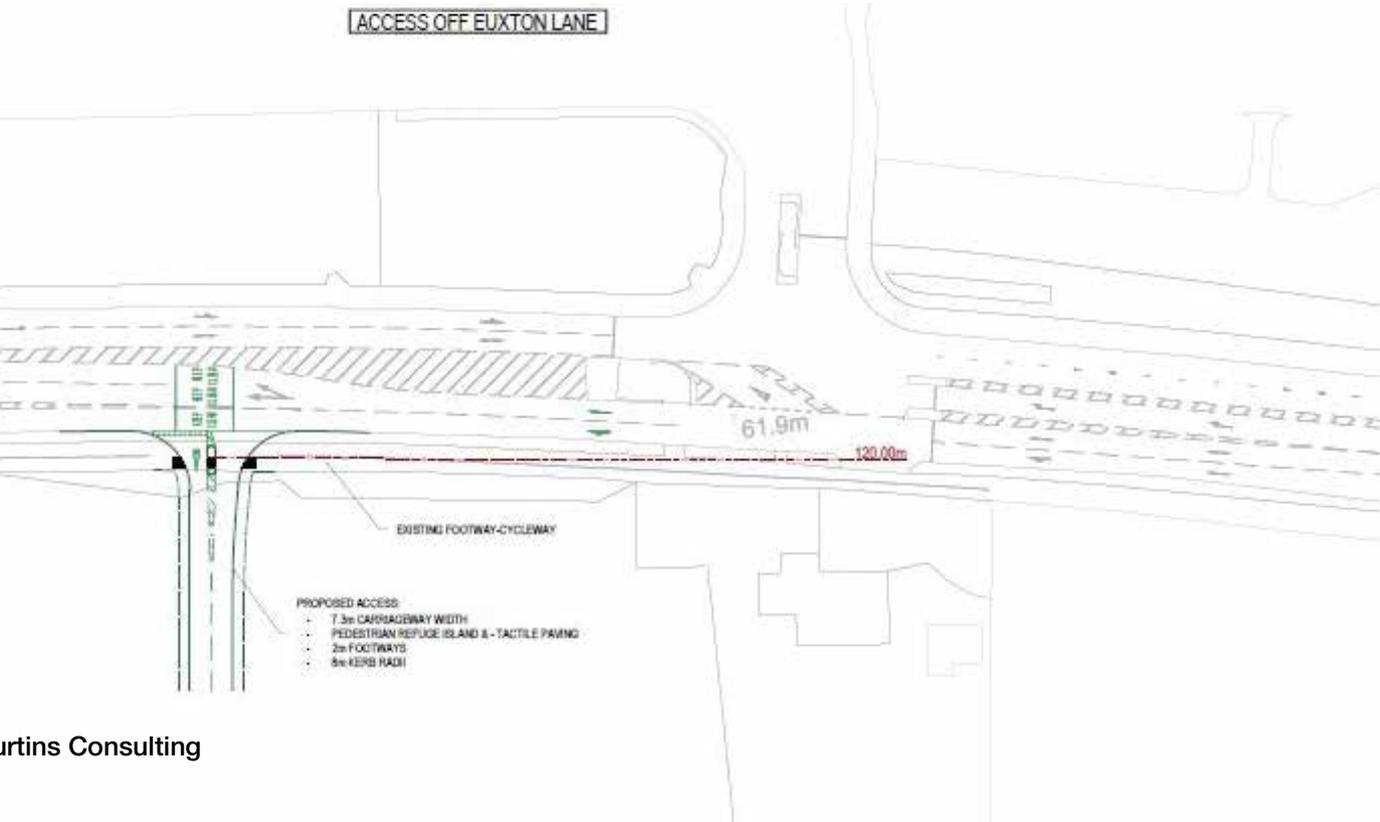


Site Access off Euxton Lane by Curtins



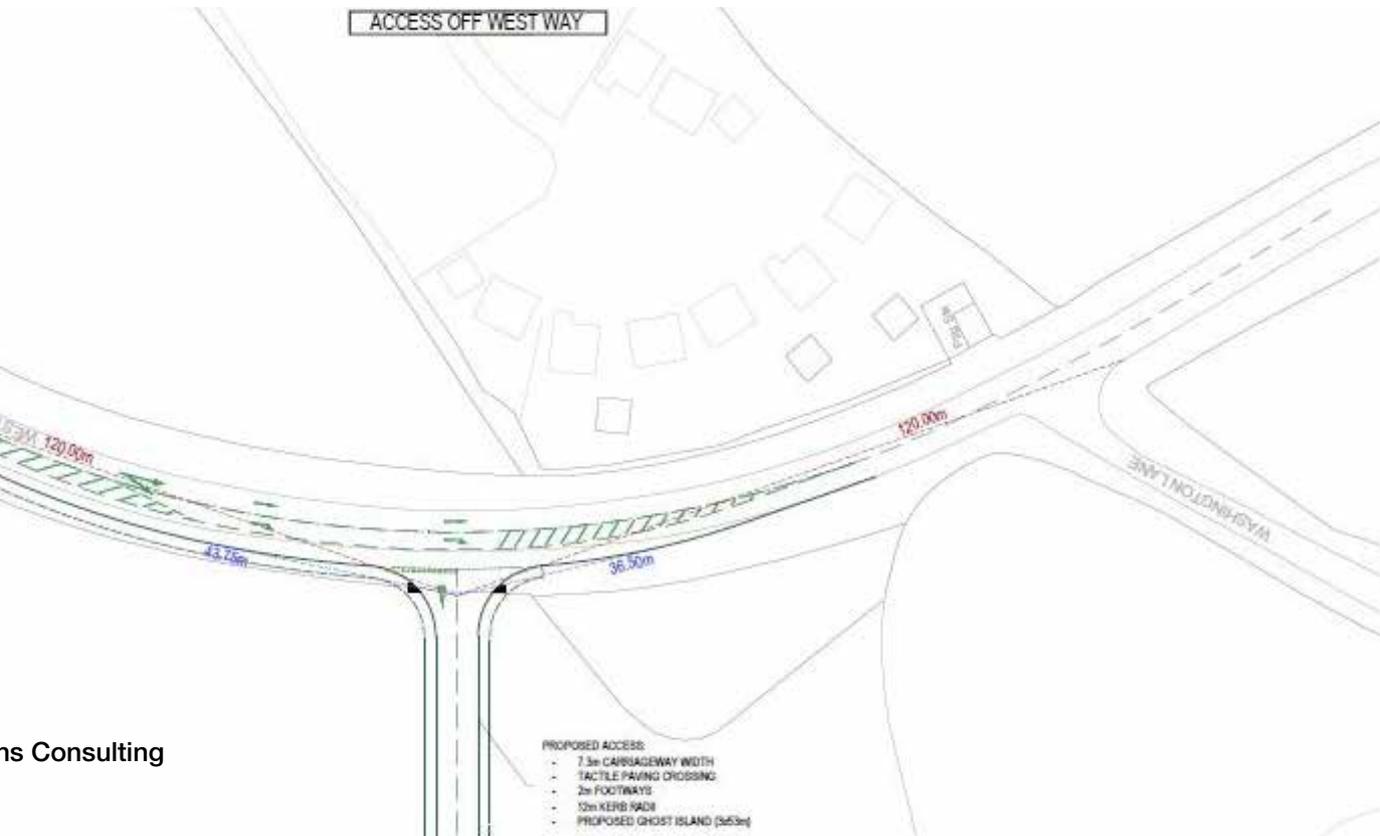
Site Access off West Way by Curtins

ACCESS OFF EUXTON LANE



rtins Consulting

ACCESS OFF WEST WAY



ns Consulting

Achievable

Technical assessments of the site have been undertaken to demonstrate that the entire site is deliverable and viable. This work is ongoing, however to date no significant constraints have been identified. The site is therefore demonstrably viable and achievable.

Drainage

Betts Hydro Consulting Engineers have produced a high level strategic overview to ensure that a sustainable drainage management solution is proposed in accordance with the NPPF and supporting Planning Practice Guidance.

The development lies within flood zone 1 and is therefore not subject to flooding. Any residual risk from surface water flooding will be managed post development through the implementation of a sustainable surface water management regime.

There are existing land drainage systems within the site, including German Brook. Topography falls towards this small watercourse making gravity fed discharge into it a possibility, (subject to agreement with the LLFA) Restricting the rate of discharge to German Brook will require on site storm water storage for extreme events.

The masterplan indicates blue green corridors within the site to combine surface water conveyance and attenuation to German Brook. Used alongside a suite of other SUDs interventions such as permeable paving and rain gardens, site drainage will pose no constraint to development.

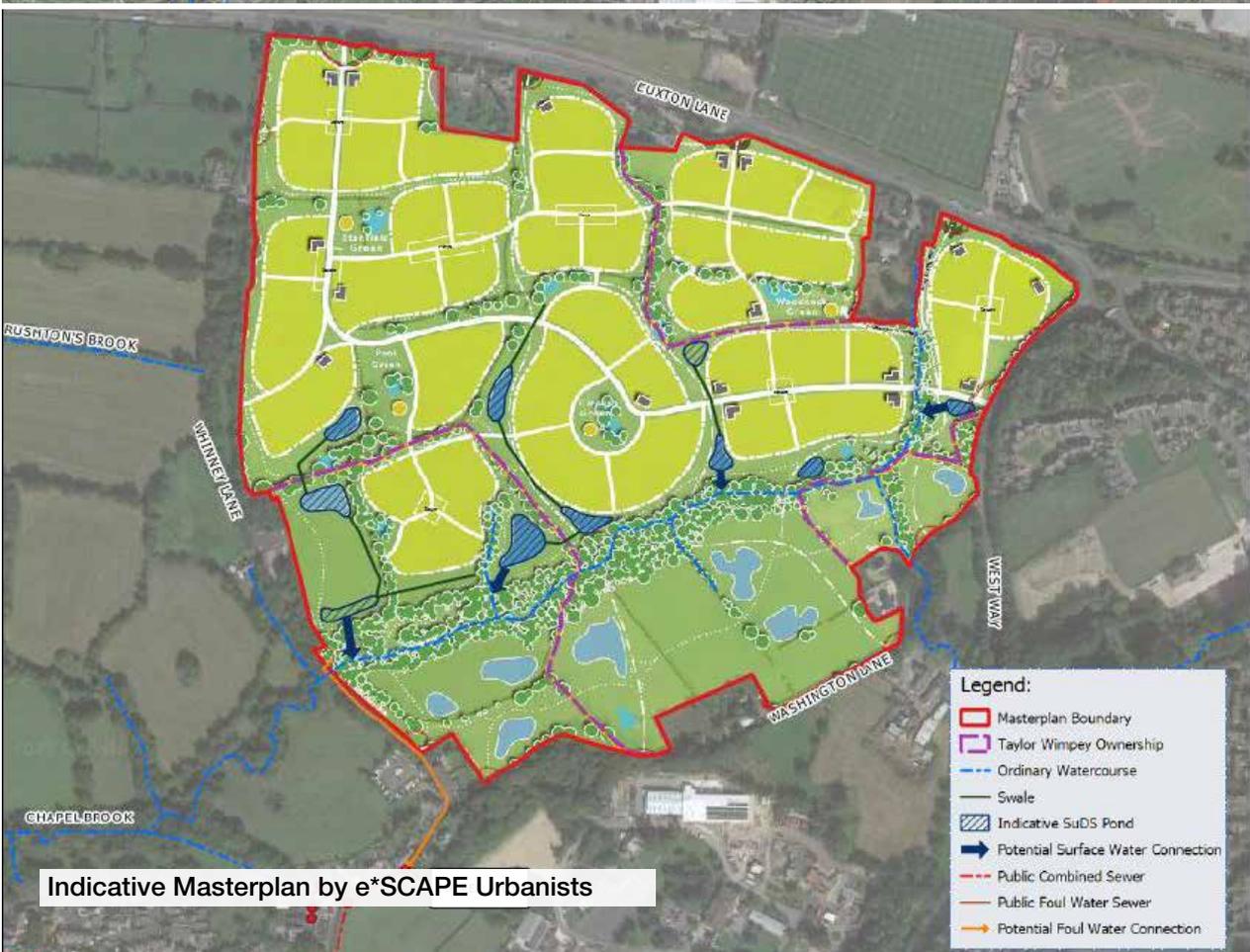
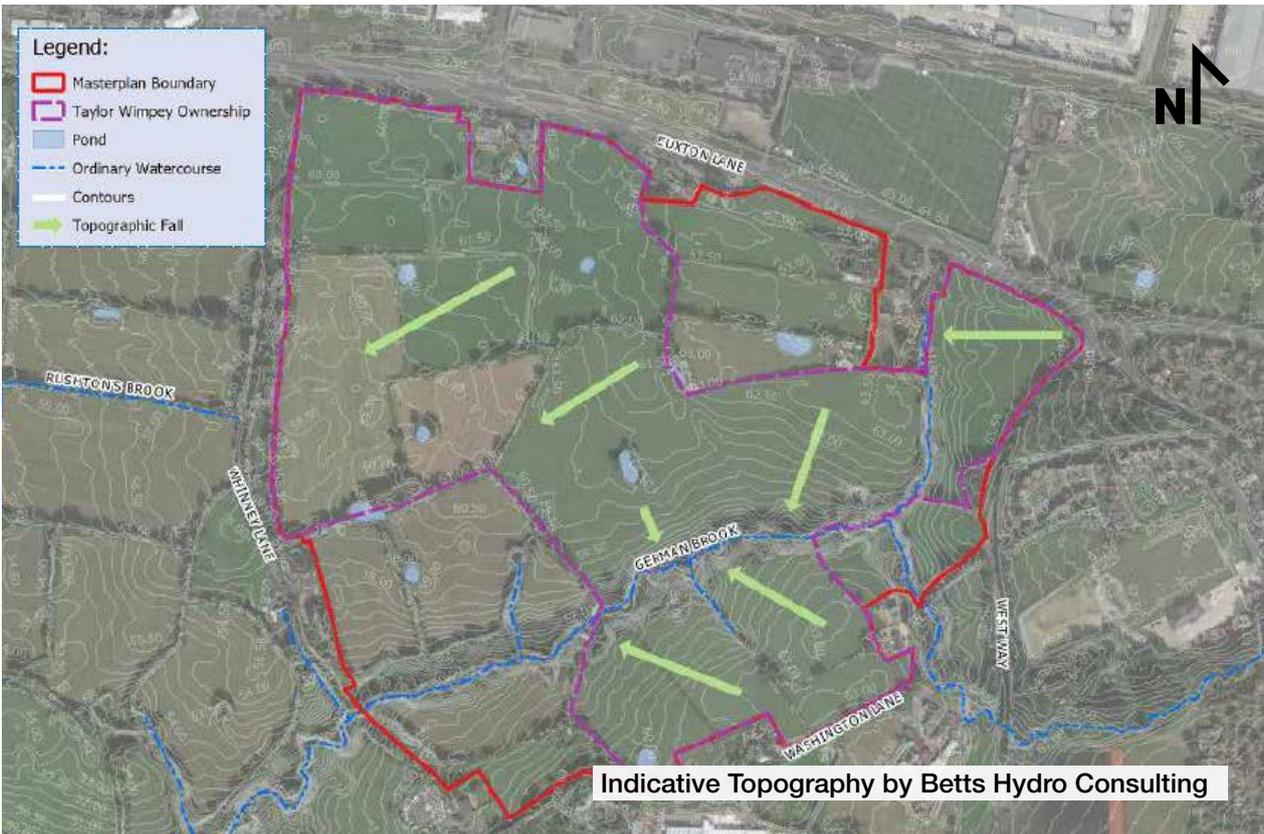
Ecology

Aspect Ecology have undertaken a high level Biodiversity Net Gain (BNG) Assessment of the proposal, on behalf of Taylor Wimpey, to determine whether a biodiversity net gain could be achieved under the proposed scheme.

Areas of medium/high ecological distinctiveness will be retained in the development, whilst the site will in general benefit from habitat creation. The new parkland to the south of the watercourse will create a mosaic of ecologically valuable habitats and improve connectivity for wildlife.

An initial high level appraisal has indicated that it is possible to achieve BNG within the site, of at least 10% of the existing calculated values for both habitats and hedgerows in line with forthcoming legislative and policy requirements.

The site is ideally located to benefit from the sustainable transport options in the area and contribute to their betterment for new and existing residents. Appropriate site access can be secured, the site be drained and it has the potential to enhance biodiversity. Whilst technical studies are at an early stage and ongoing, no constraints have been found that would preclude development. The site is therefore available, suitable and achievable.



Green Belt

Approximately 72% of land within Chorley is within the Green Belt. In order to meet the housing and employment needs of Chorley and Central Lancashire a review of Green Belt Boundaries will be required. The land at Euxton Lane is in a highly sustainable location and provides an opportunity to form a robust and long lasting boundary.

The land at Euxton Lane provides a unique opportunity to meet housing need in a highly sustainable location, maximising the use of existing infrastructure. It is located within the North West Green Belt, which is placing significant pressure and obstacle to housing delivery.

The Framework considers that Green Belt boundaries can change in “exceptional circumstances”. Such circumstances exist through the need to provide deliverable housing sites where they are needed throughout the Plan period within Central Lancashire.

To meet economic growth aspirations Central Lancashire and Chorley will need to revise the Green Belt boundaries within the emerging Local Plan to provide new boundaries with permanence that are capable of enduring beyond the Plan period.

The Framework establishes the five purposes of the Green Belt. Having reviewed the site against the purposes of the Green Belt it can be demonstrated that the allocation of the site for housing use will not undermine the integrity of the Green Belt.

The Site is related to existing built form with development along Euxton Lane and Buckshaw to the north, and Chorley to the east. There are some existing development along Euxton Lane to the south. The proposed development would spatially result in a reduction in openness at this location. However, the site is well contained, and will limit the perception of the extent of the extension. The current boundary is not robust. A new robust Green Belt boundary will be formed using distinct features of the existing woodland and German Brook to the south, and Whinney Lane to the west.

The impact on the openness of the Green Belt will be limited due to the existing level of containment of the site. The site boundary with Euxton Lane is heavily influenced by existing development and road infrastructure. It can therefore be demonstrated that the site has a limited role to play when considered against the five purposes, and the development will not undermine the Integrity of the Green Belt around Chorley.



Suggested amended
robust and long lasting
Green Belt boundary

Land Use

Euxton Lane will allow the delivery of a landscaped housing development to support the need and growth aspirations of Central Lancashire.

The site can be split into development ‘parcels’ as shown and could come forward as a phased development.

Land Use		
Use	Area (Ha)	Capacity
Residential	19.24	759 Units
Parcel 1	0.88	35 Units
Parcel 2	1.44	58 Units
Parcel 3	1.88	66 Units
Parcel 4	1.95	88 Units
Parcel 5	0.78	27 Units
Parcel 6	1.39	49 Units
Parcel 7	1.98	69 Units
Parcel 8	0.92	38 Units
Parcel 9	1.90	76 Units
Parcel 10	1.12	45 Units
Parcel 11	0.96	38 Units
Parcel 12	0.49	20 Units
Parcel 13	1.22	55 Units
Parcel 14	1.00	35 Units
Parcel 15	1.33	60 Units
Green Infrastructure	24.01	
Gross Site Area	44.36	
Gross Density		17 Units/Ha
Net Density		39 Units/Ha





Buckshaw Village Centre



Calverton Station

Princes North End Training Ground

Parcel 2

Parcel 11

Parcel 9

Parcels 10, 11 & 12

Parcel 15

Parcel 4

Parcel 5

Parcels 13&14

Parcels 7&8

Parcel 6

Public Open Space and Green Infrastructure

Landscape Strategy

The site can be developed for new homes whilst retaining most of the existing landscape features on the site. Furthermore, Euxton Lane will be transformed into a green boulevard and be a positive asset to the area.

The woodland corridor which follows German Brook is retained in its entirety creating a strong green backdrop to the site. Amenity footpaths wind through and across the valley providing connections from the proposed residential neighbourhoods to the parkland and its ecological assets to the south/south-west to Washington Lane and the outskirts of Euxton.

Many of the field hedgerows and associated trees are retained and enhanced with new planting to create an extensive green infrastructure network. This network provides not only pedestrian/cycle routes for residents but also accommodates wildlife corridors. The grasslands next to the hedgerows shall also be enhanced through the incorporation of wildflowers and meadow planting.

The development parcels for the proposed homes are set into this green infrastructure network. The site layout creates a series of outward facing blocks which shall look out onto the streets, squares, mews and green spaces

providing passive surveillance and a positive interface between homes, the public realm and wider rural fringe.

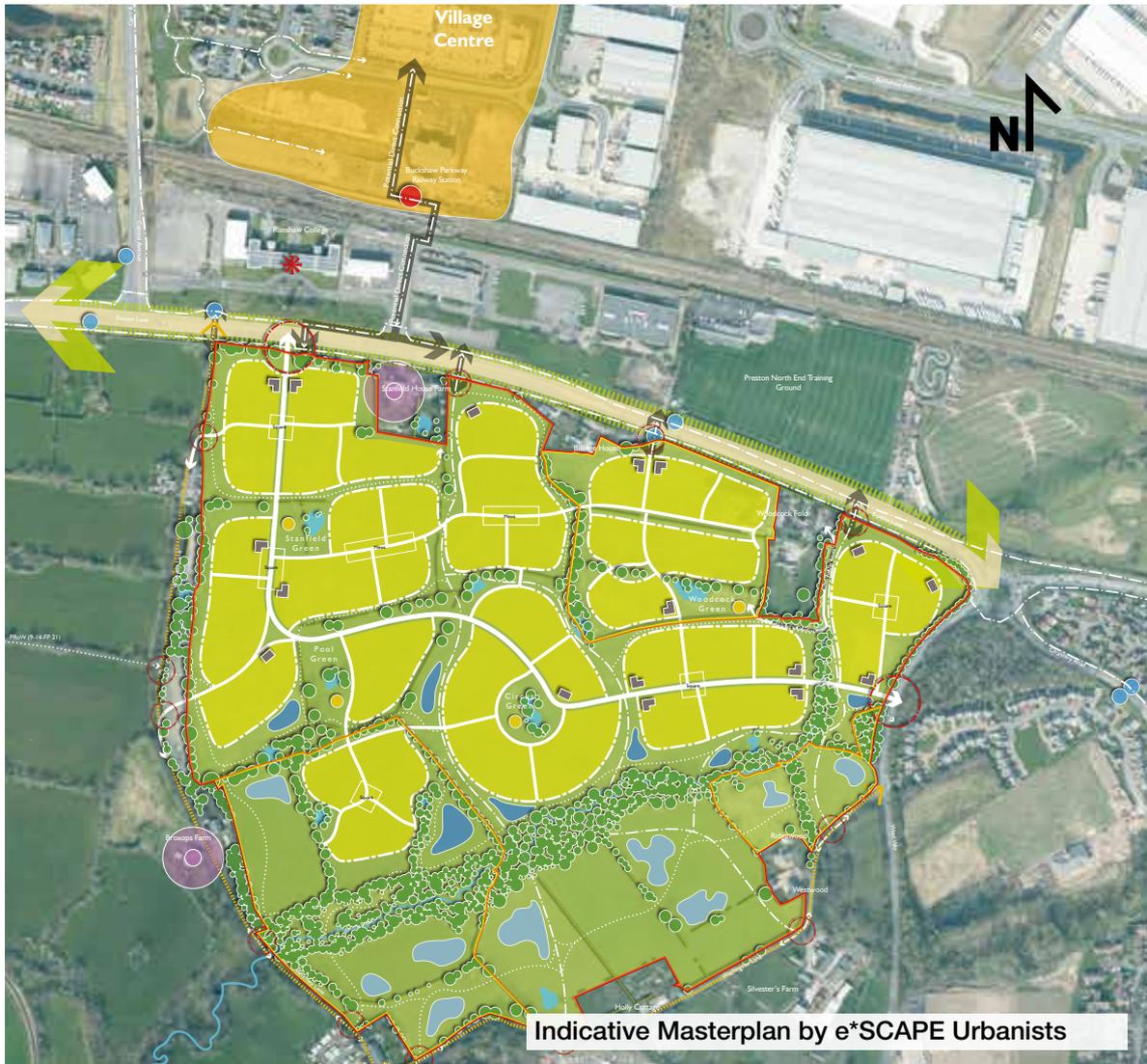
The green infrastructure network has also been used to provide a setting for the Listed Buildings that are adjacent to the site. These landscape areas will be designed with the heritage aspect in mind and could incorporate orchards and wildflower meadows to reflect the rural heritage of the area.

The central tree lined avenue acts as the spine to the site. Its north-eastern entrance runs on a visual axis between the central block of the college and the site, forming a long vista from the main gateway south deep into the site. The avenue then flows with the contours and retained landscape features gently curving through the neighbourhoods before joining up with West Way at the eastern gateway.

The avenue incorporates a series of shared space squares which are well enclosed by higher density homes and create community nodes along the route. These spaces are pedestrian priority areas and aid in slowing traffic speeds through the neighbourhoods.

In addition to the squares along the avenue a series of focal buildings shall also be created which announce arrival into the site, form a header building to a vista or at a change in direction to the route.

A series of streets and lanes branch off from the avenue serving the individual neighbourhoods and the homes within them. The streets primarily feed through the neighbourhoods and loop back to the avenue, whilst the lanes branch off from the streets and serve the unadopted shared drives which form the outer edges of the development parcels where the homes interact with the green spaces.



The streets and lanes are primarily traditional in form with a carriageway and footpaths to both sides, whereas the unadopted shared drives are a shared space lane where pedestrians share the route with low-speed local traffic.

Within the streets and lanes there are a series of shared space mews, similar in form to the squares, they act as local community nodes at the heart of the neighbourhoods.

The amenity footpath and cycleway network is sited away from the vehicular routes within the green infrastructure network and provides green routes between neighbourhoods to the surrounding area. The southern and western routes could utilise Whinney and Washington Lanes as active travel routes; in essence using them as part of the extended amenity network in the site.

As part of the creation of this new urban extension to Buckshaw Village it is proposed that Euxton Lane is enhanced into a strong green boulevard rather than the road dominated infrastructure route it is now and provides a positive asset as part of the wider Buckshaw Village. As part of this enhancement the proposed pedestrian crossing would be incorporated to ensure strong connectivity between the existing village and site.

Green & Blue Infrastructure

The Euxton Lane site will integrate the development with the surrounding blue and green infrastructure through the provision of new green connections through the site.

The indicative masterplan for Euxton Lane has been designed to improve green connections through the site by creating green links between West Way and Buckshaw Village through to a new parkland to the south of the site and the wider area.

The new routes will be designed to support habitat and create ecology corridors through the site.

The green routes will also support and encourage active travel within the site and into the surrounding area. This will create attractive routes to encourage healthy behaviours and support the wellbeing of residents.



KEY

-  The Site
-  Woodland Belts retained
-  Green Belt buffer
-  Green Spine
-  Green Edge
-  Amenity Green Space
-  Indicative SUDs Ponds
-  Indicative Eco Ponds
-  Indicative Blue Spine



Parkland

Movement

The movement strategy for Euxton Lane will seek to create new active travel routes through the site linking the new homes to the surrounding Buckshaw Village Centre, employment area and surrounding green spaces.

The focus on connectivity will be driven by the active travel routes. These will be safe and direct to seek to encourage existing and new residents, and employees to consider healthy active travel methods.

Existing pedestrian and cycle routes surrounding the site will be incorporated into the scheme. New routes will be provided to provide betterment to existing connections.

New routes will be located within the green infrastructure as part of the masterplan and within the new parkland area. This will encourage more people to enjoy healthy travel.

Further additional pedestrian connections will seek to create links to Buckshaw train station and the village centre.

Vehicular routes into the site will be created in safe locations from Euxton Lane and West Way. This will become the main route through the site but is designed to be meandering to deter rat-runs. Secondary vehicular routes will form cul-de-sacs into the development parcels with emergency access / egress where required.



KEY

-  Primary Highway
Connecting two points of access
-  Secondary Highway
-  Pedestrian/Cycle routes.



Buckshaw
Village
Centre

ty for
ccess to
village

Buckshaw Train
Station

Railway

Euxton Lane

National Cycle Route 55

Vehicular
access
location

West Way

Vehicular
access
location

Sustainability and Climate Change

The Euxton Lane site is an opportunity to deliver new homes for Central Lancashire in a highly sustainable location. The proximity of the site to existing facilities and transport options will support the creation of a sustainable place.

The orientation of the site will allow the development to maximise the opportunity to benefit from solar energy and the housing will be designed to minimise energy use.

The site can provide safe, off-road cycling routes into the wider area and can create opportunities to link these routes to the wider network. This will therefore encourage the new residents and new and existing employees of Buckshaw Village to cycle and walk into the wider area. This will encourage healthier lifestyles as well as supporting sustainable travel in the local area.

In addition, Euxton Lane will deliver a new parkland to preserve and enhance existing habitats. This will be available for use by the local community for recreation purposes which will enhance health and wellbeing in the area.

Further additional pedestrian connections will seek to create links to Buckshaw train station and the village centre.

Euxton Lane will be a development that gives residents, employees and visitors a place where they can work and live safely and enjoy being a part of Buckshaw, Chorley and Euxton.



Sustainable transport



Walkable development



Promote social community



Village Centre

Supporting local facilities and services



ustainable transport options



Proximity to local employment area

Supporting local facilities and services



velopment



Green transport

k of



Comfortable homes



Smart development

ense of
nity

Resilient buildings and infrastructure



Health & Wellbeing



Water efficiency and SUDS



Ecology and Biodiversity

Conclusion

The land at Euxton Lane, Chorley provides an opportunity to deliver new housing in a sustainable location to meet the needs of Chorley and the wider area. The site is available, suitable and achievable in accordance with the Framework and represents a sustainable residential opportunity on the edge of an established residential area.

This advocacy report shows that the Euxton Lane site at Chorley provides a unique opportunity to create a landscape-led housing development. The proposed scheme creates new homes and parkland in a sustainable location close to existing services and facilities, accessible to a range of public transport modes and the M6 and M61 motorways. The scheme can connect to and enhance existing green networks including National Cycle Route 55.

The delivery of the Euxton Lane scheme will generate significant benefits for Chorley, Buckshaw and the wider Central Lancashire region through the creation of direct and indirect job opportunities, alongside environmental and community benefits, stimulating the local economy, adding value and enhancing perceptions of the area.

Taylor Wimpey control the site including the access locations. The site is therefore “available” and can be delivered in the short term in accordance with the National Planning Policy Framework (NPPF).

It has been shown that the site is suitable for development. The site is in a sustainable location close to a range of services and facilities and public transport routes. The site lies within the Green Belt and this advocacy report confirms there are exceptional circumstances supporting the release of the site from the Green Belt due to the urgent need to meet Central Lancashire’s housing need and ambitions for growth. The site is therefore “suitable” for a landscape-led housing development in accordance with the Framework.

The site has been reviewed against the Framework and criteria for allocating sites. It has been shown that there are

no major constraints to the development of the site. The site is therefore “achievable” in accordance with the Framework.

The technical reports undertaken have informed the masterplan strategy. The strategy shows how housing can be accommodated within the site alongside connectivity, landscaping, drainage and ecological features. The masterplan strategy shows a number of access points and that the site can come forward in a phased manner. The development is therefore considered to be achievable.

It has therefore been shown that the site is available, suitable and achievable. It is considered that the site is deliverable and is also attractive to the market, viable and is deliverable within the plan period.



Buckshaw
Village
Centre

Peasall Park Golf Course

Taylor
Wimpey

Appendix B – Grey Belt Assessment



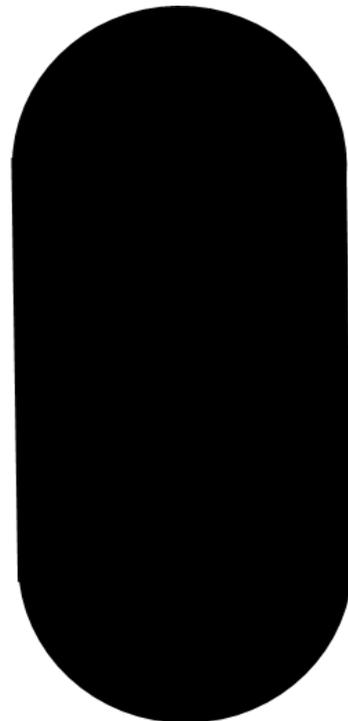
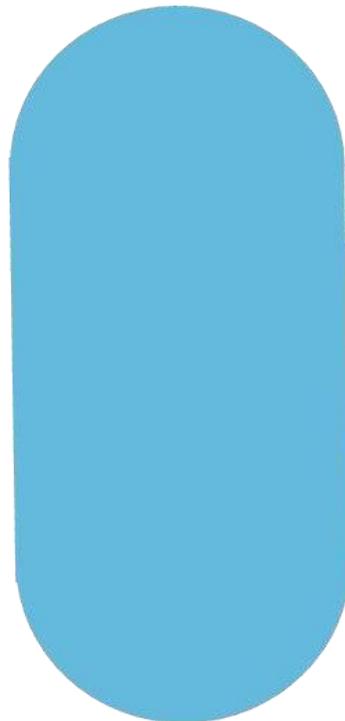
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Grey Belt & Golden Rules Statement

Land at Euxton Lane, Chorley

Taylor Wimpey UK Limited

April 2025



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1. Introduction

- 1.1. This Grey Belt & Golden Rules Statement has been prepared by Marrons on behalf of Taylor Wimpey and supports the promotion of land at Euxton Lane, Chorley.
- 1.2. It provides grey belt assessment of the Site in accordance with the revised National Planning Policy Framework ('NPPF') published on 12 December 2024 and updated National Planning Policy Guidance ('NPPG') published on 27 February 2025.
- 1.3. In summary, our desk-based assessment demonstrates that the Site is grey belt and therefore this creates a clearer path to achieve a planning permission, on the basis that the development is not regarded as inappropriate development in the Green Belt, and any consent would be subject to achieving other relevant requirements of the NPPF and local policy.
- 1.4. As a starting point, the purpose of this Report is to help to agree with the Council that the Site will utilise grey belt land, there is demonstrable need for the development and the Site is in a sustainable location, and that the proposals are also capable of achieving required contributions, such as the golden rules.
- 1.5. The revised NPPF introduced grey belt land and updated the definition of PDL as a suite of measures to significantly boost housing delivery to help the Government build 1.5M new homes over this parliamentary period. Our assessment considers how the Site performs against the PDL, grey belt, Green Belt tests and golden rules and explains how this impacts the planning strategy.
- 1.6. The first stage of the assessment assesses whether the development would not be inappropriate development in the Green Belt. It considers the five key NPPF tests relating to grey belt including:
 - Whether any designations exclude the Site being grey belt (Footnote 7);
 - Whether the Site represents a sustainable location for development and promotes sustainable transport (paragraphs 110, 115 and 155);
 - Whether there is demonstrable need for the proposed development (paragraph 155);
 - Whether the Site strongly contributes towards purposes A, B and D (Annex 2, paragraph 155 and NPPG purposes assessment criteria); and
 - Whether development at the Site would fundamentally undermine the purposes of the remaining Green Belt across the area of the plan (paragraph 155).
- 1.7. Secondly, our assessment considers the openness of the Green Belt which is recognised as a key Green Belt test for any proposals in the Green Belt. It is

however acknowledged that the openness assessment is not a mandatory requirement for PDL or grey belt land (in accordance with Footnote 55 and NPPG) but nonetheless current decisions (as set out in officers reports and appeals) still consider openness in the scenario that a site is not grey belt. Therefore, our assessment only provides a high-level overview of openness based on best practice because the Site is considered to utilise PDL and grey belt land.

- 1.8. Thirdly, our assessment considers whether the proposed development would achieve the golden rules (paragraph 156) which are required for grey belt including:
 - Whether the proposals would deliver the required level of affordable housing;
 - Whether the proposals would provide any necessary improvements to infrastructure; and
 - Whether the proposals would provide new or improvements to accessible open space.
- 1.9. In summary, our assessment concludes that the Site is grey belt, there is demonstrable need and the Site is sustainable, and, at this stage of the design process, the proposals would be expected to achieve the required contributions, such as the golden rules.

2. Lessons from Grey Belt Decisions

2.1. Following the revised NPPF (2024) there have been a number of encouraging appeal decisions and planning committee decisions concerning major housing developments in the Green Belt. Key decisions include:

- Proposals for 250 dwellings at Burstead in Basildon Council, consented at planning committee on 8th January (ref: 24/00762/OUT).
- Proposals for 420 dwellings at Harpenden in St Albans City and District Council, consented at planning committee on 17th February (ref: 5/2023/0327).
- Proposals for 57 dwellings at Hadlow in Tonbridge and Malling Borough Council allowed at planning appeal on 21st February 2025 (ref: APP/H2265/W/24/3346228).
- Proposal for care home and 95 assisted living units in Buckinghamshire Council – allowed at appeal on 14th February 2025 (ref: APP/N0410/W/24/3348677).
- Proposals for 120 dwellings at Beaconsfield in Buckinghamshire Council dismissed at planning appeal on 24th February 2025 (ref: APP/N0410/W/24/3347882).

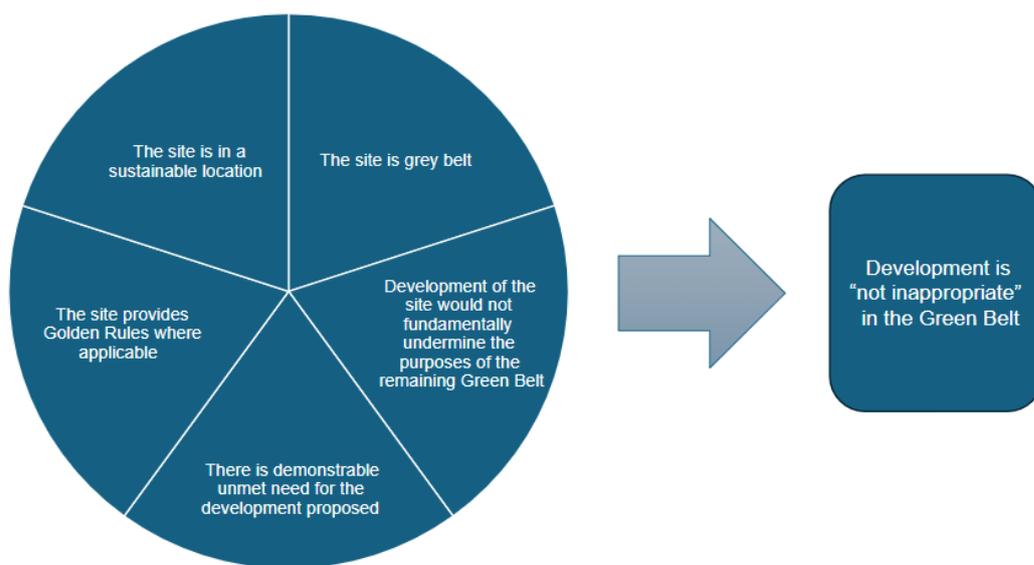
2.2. Each decision-maker (for the permitted schemes) considered the Sites to utilise grey belt and each scheme achieved the golden rules. As result of being grey belt the assessment was openness was not required.

2.3. In spite of this, some of the decisions considered openness and also discussed “very special circumstances” in the scenario that a site was not grey belt. The mix of outcomes also demonstrates the subjective nature of the Green Belt assessment in spite of recent Government guidance, so each site is considered on a case-by-case basis.

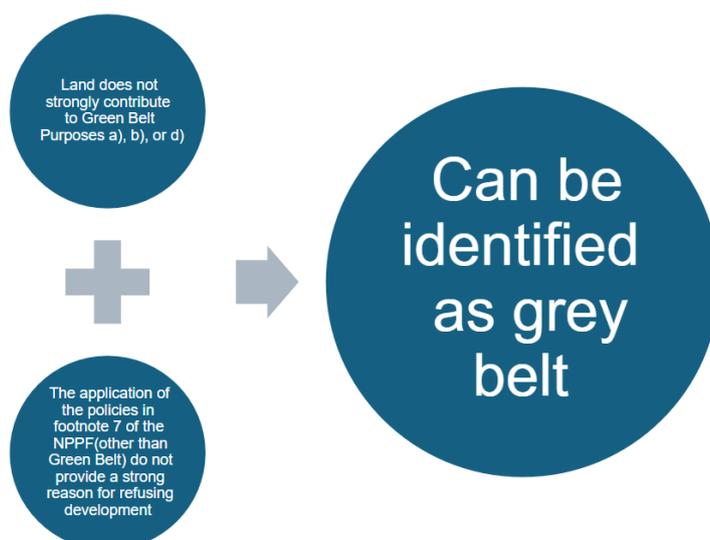
3. Grey Belt Assessment

- 3.1. Recent revisions to national policy have brought about sweeping updates to Green Belt policy and guidance. Many of the Green Belt's core principles are still in place. Development may only take place on designated Green Belt land under very specific circumstances boundaries may only be revisited in exceptional circumstances, and the Green Belt's core goal is still the same.
- 3.2. There are several significant amendments. Councils should now review their Green Belt boundaries *“where an authority cannot meet its identified need for homes, commercial or other development through other means.”*
- 3.3. In such circumstances *“authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan”* (paragraph 146).
- 3.4. That is to be achieved by a prescribed test set out in paragraph 148: *“plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”*
- 3.5. There are also new prescribed scenarios in which development on the Green Belt will not be considered inappropriate (those being detailed at paragraphs 154-5). Perhaps most notably, development on the Grey Belt would not be inappropriate *“where: a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan; b. There is a demonstrable unmet need for the type of development proposed; c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.”*

- 3.6. As detailed above, the revisions to national policy and guidance have introduces land that can be considered Grey Belt.
- 3.7. Recent changes to the PPG, as detailed in the below diagram, indicate that where a site is Grey Belt, in a sustainable location, meets the Golden Rules, there is a demonstrable unmet need and development would not fundamentally undermine the purpose of the Green Belt as a whole, development should not be considered inappropriate (PPG Paragraph: 010 Reference ID: 64-010-20250225).



- 3.8. The Grey Belt is defined as “land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. *‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development*” (Annex 2, page 73).
- 3.9. Details of the approach to be taken to the assessment of Grey Belt is detailed in the PPG (Paragraph: 007 Reference ID: 64-007-20250225) and principally comprises two distinct elements;
- Land that does not strongly contribute to Green Belt Purposes A, B and D; and
 - Where the application of policies in footnote 7 of the NPPF do not give rise to a strong reason for refusing development.



3.10. Taking the above into consideration, the below assesses the Euxton Lane site against the 5 identified tests (Footnote 7 constraints, sustainability, needs, purposes A,B and D and wider Green Belt consideration). Commentary is provided in regard to each of these elements.

Table 5: Grey Belt Assessment

Test	Pass / Fail	Commentary
Test 1. Designations (footnote 7)	✓	The site is not considered a habitat site as defined by para 194 of the Framework. The site does not form part of or is located proximally to a Site of Special Scientific Interest The site is not a Local Green Space The site is not within a National Landscape The site is not a National Park The site is not a Heritage Coast There is no irreplaceable habitat located within the site as confirmed through the submitted Preliminary Ecological Assessment There are no designated heritage assets within the site. The site is located in Flood Zone 1. As such, the development of the site is not restricted by footnote 7 constraints and test 1 is passed.
Test 2. Sustainability (para 155)	✓	Chorley is a sustainable location and principle location for growth. It has regular bus services and a range of services and facilities, including multiple schools, local shops, restaurants, community centres and sporting provision. There is a train station with 800m of the site. Test 2 is passed.
Test 3. Needs (para 155)	✓	As confirmed by the Council's May 2024 Housing Land Supply Statement, the Council cannot demonstrate a sufficient supply of housing (2.86 years). As such there is an agreed demonstrable unmet need and as such test 3 is passed.

Test 4. A, B, D Purposes		
- A	✓	The site is bound to the north by Euxton Lane and Buckshaw Garden Village beyond. Owing to German Brook development could not extend further south than that proposed and the presence of a road (with fields beyond) redistricts development extending further west. No contribution to Purpose A.
- B	✓	As is demonstrated on the illustrative framework plan, it is not proposed to extend the built form any further west than the current extent of development. As such, development of the site would not give rise to merging of towns . No contribution to Purpose B.
- D	✓	Chorley is not a historic town. The site therefore does not form part of the setting of a historic town, nor does it have any physical, visual or experiences connection to a historic town. Consideration of the heritage impact of the proposed development is set out in the supporting Heritage Impact Assessment. No contribution to Purpose D.
Test 4. Conclusion		The Site makes no contribution to Purposes A, B or D. Test 4 is passed.
Test 5. Wider Green Belt (para 155)	✓	Development of the site would not fundamentally undermine the Green Belt in Chorley as a whole. The site represents only a very small area of the Green Belt and as demonstrated on the submitted illustrative framework plan, the new Green Belt boundaries would follow existing features on the ground including established road corridors where existing hedgerows and tree planting would be predominantly retained. As such, a strong defensible boundary would be created. Test 5 is passed.

- 3.11. Clearly therefore, having regard to the above, the **Site meets the Grey Belt tests** set out in policy and guidance and as such, subject to the Golden Rules, set out in the following chapter, should be considered Grey Belt.
- 3.12. Notwithstanding the clear evidence that the site does meet the tests of Grey Belt, even if it were determined that the site remains part of the Green Belt, we consider that Exceptional Circumstance for release from the Green Belt exist with the below points of particular relevance;
- The national housing crisis;
 - Lack of a five-year housing land supply
 - Crisis of affordability
 - The economic and social benefits associated with the development

4. Harm to the Openness of the Green Belt

- 4.1. This section of the report considers how the removal of the Site, and the addition of the proposed development would have a bearing upon the openness of the Green Belt and as such, considers several factors including spatial and visual aspects, and the degree of activity, in addition to the baseline, likely to be generated by the proposed development.
- 4.2. A conclusion is then reached on whether, in accordance with paragraph 155a of the NPPF, the proposed development would result in a fundamental undermining of the purposes (taken together) of the remaining Green Belt land. The overall judgement is set out in Section 4 of the report taking into account the mitigation measures proposed, including the redefinition of the Green Belt boundary.
- 4.3. Green Belt is addressed in the NPPF (2024) in section 13 of the document. The essential characteristics of Green Belts are their openness and their permanence. Further guidance is provided as to what factors can be considered when assessing the potential impact of development on the openness of the Green Belt which is documented in Planning Practice Guidance at paragraph 001 Reference ID: 64-001-20190722. This paragraph notes that assessing the impact of a proposal on the openness of the Green Belt, requires a judgement based on the circumstances of the particular case. By way of example, the courts have identified several matters which may need to be considered in making this assessment. These include, but are not limited to:
 - “Openness is capable of having both spatial and visual aspects – in other words the visual impact of the proposal may be relevant, as could its volume. The duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
 - The degree of activity likely to be generated, such as traffic generation”
- 4.4. The spatial aspect, as it relates to the sense of openness with regard to the Site, is informed by several factors including the relationship of the Site to the existing settlement and the robustness of any revised boundaries to the Green Belt, following removal of the Site from the designation.
- 4.5. The removal of the Site from the Green Belt would have an inevitable effect upon the spatial aspect of Green Belt openness, however the proposal would:
 1. cover only a small area of the Green Belt in the area;

2. be physically well related and connected to the existing adjoining town edge to the east north;
 3. comprise a notable extension of Chorley that takes into account existing densities and building heights and would be in keeping with the historical pattern of substantial outward town growth.
 4. include notable areas of undeveloped land as public open space, incorporating existing planting and enhancing green infrastructure including public access; and
 5. the new Green Belt boundaries would follow existing features on the ground including road corridors where existing hedgerows and tree planting would be predominantly retained. The site boundaries including the new access road at the southeast corner of the site would be reinforced by new planting, typically comprising woodland belts.
- 4.6. The visual openness of the Green Belt considers the visual links of a Site or area such as a Green Belt parcel, to the wider Green Belt, intervisibility between settlements, and potential impacts on wider ranging views across the Green Belt.
- 4.7. The Site offers minimal public access, save for a connection from the west, where a public pathway runs to the boundary of the site. The established hedgerow and tree growth surrounding most of the site perimeter, along with the predominantly flat terrain and restricted public access, restricts visibility of the Site. The visual element of perceiving openness in connection to the Site is best appreciated from areas accessible to the public, where individuals can traverse the environment; this mainly pertains to public rights of way and roads.
- 4.8. The sense of visual openness associated within the wider Green Belt landscape would remain materially unchanged with the Site developed and removed from the designation.

5. Golden Rules Statement

5.1. Paragraph 156 of the NPPF 2024 states;

“Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:

- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b. necessary improvements to local or national infrastructure; and*
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces”.*

5.2. Paragraph 157 goes on to state;

“Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%”

5.3. The below therefore considers the proposed development against each of these rules.

Table 6: Golden Rules Assessment

Rule	Pass / Fail	Commentary
Provision of affordable housing	✓	In line with the Golden Rules, the proposed development could deliver up to 45% affordable housing, subject to viability and the guidance expected from the Government later this year. This is 15 percentage points above the existing requirement and can be secured through a Section 106 legal agreement.
The provision of infrastructure	✓	The proposed development includes significant improvements to infrastructure at a local scale. For completeness this includes; <ul style="list-style-type: none"> - Highway mitigation improvements - Provision Section 106 contributions
Accessible Greenspace	✓	A significant area of the site comprises accessible green space. The identified green space in the masterplan (albeit the application is in outline) will be accessible to new and existing residents. Care has been taken to ensure that a green network runs through the centre of the site, connecting the proposed community facilities with proposed residential dwellings. The proposed development includes and strongly promotes active travel corridors, with green routes prioritised for use by pedestrians and cyclist.

6. Conclusions

- 6.1. This Grey Belt & Golden Rules Statement has been prepared by Marrons on behalf of Taylor Wimpey and supports the promotion of land at Euxton Lane, Chorley.
- 6.2. Changes in national policy in regard to the approach to be taken to Green Belt include a mandate to review Green Belt boundaries and the introduction of Grey Belt land, where development is not considered inappropriate.
- 6.3. Further to a detailed assessment of the subject site it has been concluded that the site is Grey Belt and more than sufficiently delivers on all three of the Golden Rules now set out in national policy.
- 6.4. The site will deliver 45% affordable housing, subject to viability, significant areas of accessible, and useable green space and infrastructure that simply without development such as this, would not be delivered.
- 6.5. The Council now accept that they are unable to demonstrate a sufficient supply of deliverable housing.
- 6.6. As such, we invite the Council to approve the application without delay.



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Appendix C – Viability Report

Representation in Respect of Central Lancashire Local Plan
Viability Assessment

April 2025



RogerHannah

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I. Executive Summary

I.1 Overview

Roger Hannah has been instructed by Story Homes, Northern Trust, Persimmon, Wain Homes and Taylor Wimpey ('the Parties') to provide a consultation response to the published Central Lancashire Local Plan Viability - Main Viability Report ('MVR') February 2025, which has been prepared by Aspinall Verdi ('AV') on behalf of Preston Council, South Ribble Council and Chorley Council ('the Councils').

The Parties either control land in Central Lancashire that has residential development potential or anticipate that they will have involvement in residential development in Central Lancashire in the future period which will be covered by the new Local Plan.

Roger Hannah is particularly concerned that the proposed policy requirements of the Central Lancashire Local Plan hold the potential to impact upon housing delivery in Central Lancashire due to insufficient assessment of benchmark land values and conclusions drawn from "*Pragmatic Scenario*" testing, rather than the more realistic "*Worst Case Scenario*".

Lack of commentary within this representation in respect of any aspect of the MVR does not imply our agreement and may be subject to further representation at a later stage.

It is Roger Hannah's professional opinion that the MVR is based upon:

- inputs that are not market-facing, including only one week to respond to the Councils' Stakeholder Engagement exercise in January 2025;
- inputs that are not appropriately evidenced and market sense-checked; and
- inputs and analysis that lack either transparency of methodology or requisite supporting evidence.

On this basis it is Roger Hannah's conclusion that the MVR:

- does not accord with Planning Practice Guidance – Viability¹ ('PPGV'); and
- is inconsistent with the mandatory relevant RICS Guidance²

The key implications for the Central Lancashire Local Plan ('CLLP') are summarised as follows:

- The results of the MVR over-estimate the financial viability of site typologies that are tested; and
- The lack of transparency precludes stakeholders from providing full and considered technical responses to the consultation on the CLLP.
- The viability testing in the MVR determines that most typologies and strategic sites are unviable or marginal and it is essential that the Local Plan includes the ability for applicants to submit a site specific viability assessment in order to reduce the affordable housing provision and/or S106 contributions dependent upon the circumstances of each site. Consideration must be given to zoned affordable housing policy requirements, dependent upon value area, to reflect the negative appraisal outputs.

¹ MHCLG (2019) Planning Practice Guidance - Viability

² RICS (2021) Assessing viability in planning Under the National Planning Policy Framework 2019 for England Guidance Note, 1st Edition March 2021 for this purpose

I.2 Technical Issues - Summary

The primary technical issues within the MVR, as identified by Roger Hannah, are set out in summary as follows:

- Worst Case Scenario and Pragmatic Scenario: the MVR adopts leading wording insofar as the baseline viability testing is labelled “Worst Case Scenario” whilst the preferred viability testing is labelled “Pragmatic Scenario”. This approach makes it very difficult to read the MVR without thinking that the “Worst Case Scenario” for testing is of limited worth whereas, in reality, it is a standard form of baseline testing adopting reasonable appraisal assumptions, subject to some amendments relating to greenfield abnormal costs, site infrastructure costs and garage costs.

The “Pragmatic Testing” is obviously favoured by AV but there is no need for the MVR to fundamentally direct a reader’s opinion by way of diversionary wording, which should be amended.

- The MVR makes a number of references to a BLV caveat, which states that “the BLVs contained herein are for ‘high-level’ Plan viability purposes” ...and... “no way implies that this figure can be used by applicants to negotiate site specific planning applications”. This approach is contrary to Planning Practice Guidance: Viability (‘PPGV’)³, which states that “Where a viability assessment is submitted to accompany a planning application this should be based upon and refer back to the viability assessment that informed the plan”.
- The MVR adopts the same unit typology for all testing of housing developments in low, medium and higher value areas, including 7% 1 and 2-bed apartments. It should be anticipated that unit typologies will vary, depending upon the value location and site type with more terraced and semi-detached homes of smaller sizing in lower value areas and more detached of larger sizing in higher value areas.

The adoption of 7% apartments within a standard housing mix is contrary to market expectations, with very few new build developments including apartments. We are not aware of any housing study data which suggests that 7% apartments should be provided within housing developments and this assumption should be amended. Generally speaking, on housing sites of any scale, above 10 units, we would not expect there to be open market demand for 1 and 2 bedroom apartments outside of town centre locations.

Re-testing using more appropriate unit mixes is required.

- The “Pragmatic Scenario” testing increases the development density from 21 dwellings per hectare in ‘outside settlement boundary’ locations and 27 dwellings per hectare in “other locations within settlement boundaries” to 35 dwellings per hectare. The lower densities are referenced in the draft Local Plan. This increases the development density from 9,646 sq ft per acre in areas that are outside settlement boundaries and 12,862 sq ft per acre in other locations within settlement boundaries to 16,077 sq ft per acre.

16,077 sq ft per acre is what we would expect to see in lower value locations only. It must be anticipated that the number of larger unit types will increase with increasing values but that densities will reduce, with c.15,000 sq ft per acre applicable in medium value areas and 14-14,500 sq ft per acre in higher value areas.

³ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 008 Reference ID: 10-008-20190509

It is not stated in the MVR, but it is essential that the densities referenced in the MVR are applied to the net developable areas of development sites.

- The net site area for brownfield sites is determined to equate to 100% of the gross site area whilst greenfield sites have a net area equating to 75% of the gross area.

No explanation is provided for this approach and it is not regarded as appropriate, as any housing development will lose developable area to areas of public open space, biodiversity net gain and other issues such as single sided road development.

There is no reason why a brownfield site should have an increased net to gross allowance if standard housing development is assumed. This serves to overstate the viability of the brownfield site testing.

- Sales values are assessed in the MVR with reference to historic sold prices from the past three years, with very little regard given to new build asking prices mainly due to the lack of unit sizing within the comparable data that has been obtained.

A simple phone call to the developer of each new build development to obtain unit sizes would enable a full breakdown of £ per sq ft values to be provided by AV in respect of current asking prices which must be regarded as important, subject to reductions in respect of purchaser incentives and negotiations.

- Benchmark land values are adopted at £150,000, £200,000 and £250,000 per net developable acre for low, medium and high value greenfield sites, with £150,000, £210,000 and £275,000 per net developable acre for brownfield low, medium and high value areas. Strategic greenfield sites are assessed at £166,666 per net acre.

Evidence is provided in respect of previous Local Plan and CIL Viability Assessments, site specific viability assessments (confidential) which have been reviewed by AV, agricultural land transactions and greenfield residential site transactions.

The evidence base would appear appropriate, however, the greenfield residential site transaction evidence mainly relates to very small sites of 0.25-0.6 acres, with one larger site of 6.8 acres having no achieved land value and another larger site of 36 acres having a very low value equating to £58,611 per acre per acre (gross/net not stated).

PPGV states that “*land transactions can be used but only as a cross-check to the other evidence*”⁴.

It is regarded as important for benchmark land values to have a sense check against policy compliant land transactions. We have obtained details of seven land sale transactions in Central Lancashire which provide evidence of values equating to £237,826 - £1,334,036 per gross acre, averaging at £441,848 per gross acre. From what we understand, each of these developments was policy compliant in respect of affordable housing provision and it is understood that S106 contributions were also policy compliant.

- The MVR adopts benchmark land values which are based on the net developable site area whereas our understanding of land owner expectations is that they will require payment for their full gross site area and it is essential that BLVs are assessed on this basis.

⁴ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 016 Reference ID: 10-016-20190509

- The MVR is also clear that the assessment of BLV included does not allow for abnormal costs which contradicts the PPG and RICS guidance, with PPGV stating⁵ that “As far as possible, costs should be identified at the plan making stage.” “Costs include: build costs based on appropriate data, for example that of the Building Cost Information Service abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value.”

Local plan viability testing should set the minimum ‘cut-off’ point at which a reasonable landowner should expect to receive for their land and not be subject to further adjustments. It is already evident the BLVs adopted are too low and cannot be reasonably adjusted downwards any further.

- The Pragmatic Scenario appraisals adopt differing assumptions from those used for the “Worst Case Scenario”. The amendments are made to:
 1. construction costs, with lower quartile costs being adopted for all schemes rather than just for those schemes of 50+ units. Smaller schemes will not be completed by national housebuilders and it is essential that higher construction costs in line with BCIS Median Costs are adopted.
 2. Profit is reduced from 20% on open market sales to 18%. With current uncertainties in the market relating to high interest costs, increased cost living, reduced affordability, reduced sales rates and increased levels of incentives a profit level equating to 20% of GDV is regarded as essential. Also, the introduction of the Residential Property Developer Tax, which reduces developer profits by 4% requires that profit is maintained at 20%.
 3. BLVs are reduced to £100,000 per net acre across the lower and medium value zones. This reduces what were already insufficient BLVs and it is essential that higher BLV rates are adopted in line with the evidence base and guidance requirements.
- No cash flows are provided to support the appraisals which are attached to the MVR at Appendix 8. A sample of cash flows should be provided to enable stakeholders to check that development timescales and sales rates are cash flowed appropriately.
- Viability Appraisals for the four strategic sites are not included in the MVR, meaning that appraisal methodology and results cannot be checked.
- Results of each brownfield and greenfield test on a “Worst Case Scenario” and “Pragmatic Scenario” are set out within MVR 6.16 – 6.121. However, many of the results shown do not match with the appraisal results tables at MVR pages 72 – 100. This lack of consistency reduces the credibility of the MVR and the conclusions reached therein and does not comply with the requirements of PPGV Paragraph 020⁶, which states: “The inputs and findings of any viability assessment should be set out in a way that aids clear interpretation and interrogation by decision makers.”

⁵ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 014 Reference ID: 10-012-20240214

⁶ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 020 Reference ID: 10-020-20180724

I.3 Conclusion

The MVR shows all typologies to be unviable when assessed on “*Worst Case Scenario*” assumptions and out of the 37 “*Pragmatic Scenario*” viability tests, only 38% are shown to be viable, with the nine marginal schemes showing viability deficits of between -£5,720 to -£90,405.

It is essential that the Local Plan includes provisions for site specific viability testing to reduce the affordable housing provision and/or S106 contributions dependent upon the circumstances of each site, due to the lack of policy compliant viability shown within the Council’s evidence. Consideration must be given to zoned affordable housing policy requirements to reflect the negative appraisal outputs, as adopted by many other local authorities.

2. Introduction

2.1 Purpose

This representation has been prepared by Roger Hannah and is submitted on behalf of Story Homes, Northern Trust, Persimmon, Wain Homes and Taylor Wimpey.

Roger Hannah has substantial experience of preparing viability appraisals in support of a wide range of development proposals mainly in the North West of England and acting for Councils in the review of submitted viability assessments.

This document sets out the Parties' representation on the published Central Lancashire Local Plan Viability - Main Assessment Report February 2025.

The above document has been prepared for the Councils by AV and the MVR states "*the primary aim of the commission is to produce and up-to-date viability assessment, which will form a robust and sound evidence base for the Local Plan review*".

This representation relates to the assumptions that have been adopted within the MVR in respect of the viability assessments of various development typologies and the conclusions reached within the MVR.

The Councils previously issued a Stakeholder Engagement document by Aspinall Verdi in January, but only allowed stakeholders one week to respond in January 2025. This restricted the ability to provide full responses.

In accordance with the RICS Professional Statement⁷:

The person(s) involved in the preparation and review of this representation are suitably qualified professionals that have extensive experience advising on viability matters across the region.

There are no conflicts of interest that affect our independent opinion being provided.

Roger Hannah has acted with objectivity, impartiality, without interference and with reference to all appropriate available sources of information.

Roger Hannah has accorded with the relevant RICS practice guidance⁸ in the preparation of this document.

The report has been undertaken and reviewed by suitably qualified professionals.

⁷ RICS (2019) Financial viability in planning: conduct and reporting, 1st edition, May 2019

⁸ RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England Guidance Note, 1st Edition, March 2021

Author:



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Steve Smith MRICS
Director

Reviewer:



.....
Laura Mackay MRICS
Director

2.2 MVR Results Summary

The MVR Conclusions and Recommendations section states that *“our Viability Appraisals demonstrate that medium and higher value greenfield sites, both within and outside settlement boundaries, are viable. Higher value brownfield sites within settlements also show viability, although they become marginal in out-of-settlement locations. Medium value brownfield sites are assessed as marginal both within and outside settlements. However, these marginal schemes require only minor shifts in market conditions to become viable.”*

It is noted that the conclusions are drawn from the *“Pragmatic Scenario”* testing, rather than the *“Worst Case Scenario”* testing. Further comments in respect of the two forms of testing are provided herein, with the *“Worst Case Scenario”* testing regarded as reasonable and representative of current market expectations.

In respect of strategic sites, the MVR states that *“it is not possible to state with certainty at this stage whether the sites are deliverable.”*

Due to a general lack of viability, both on the *“Worst Case Scenario”* and the *“Pragmatic Scenario”*, it is essential that the Local Plan includes appropriate affordable housing requirements, reflecting the site’s viability status and provisions for site specific viability testing.

3. Representation

This representation sets out the Parties' detailed comments on the MVR and appendices, which are the primary documents to be used to inform the level of viability and deliverability of residential development sites within the three Council areas once the Local Plan is introduced.

The representations are arranged according to the relevant document and section/paragraph numbers within the MVR. Requests and recommendations to introduce modifications to the MVR are made to the Councils in order to improve transparency, reflect market expectations and determine appropriate levels of viability and are stated under a series of subject specific headings drawing titles from the TDCVA.

3.1 Viability in Plan Making

The Government published its most recent amendments to the revised National Planning Policy Framework ('NPPF')⁹ in December 2024 and updated National Planning Practice Guidance for Viability ('PPGV')¹⁰ also in December 2024. Both the NPPF and PPGV include an up-to-date position on the Government's intended role for viability assessment, the methodology, and procedures expected of all stakeholders in the preparation of such evidence.

PPGV Paragraph 010¹¹ concisely defines the Government's objective for the role to be played by viability within the planning system:

"In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission."

PPGV Paragraph 002¹² states that policies introduced to the plan should be realistic and deliverable.

PPGV Paragraph 020¹³ confirms that the inputs and findings of any viability assessment should be set out in a way that aids clear interpretation and interrogation by decision makers.

3.2 Viability Assessment Method

MVR ES15 references the provision of sensitivity scenarios for each of the typologies. It is stated that *"this is to de-emphasise the BLG in each typology and help consider viability 'in the round'"*. This is regarded as an unusual comment as the BLV is an essential element of any viability assessment as sites will not come forward for development without an appropriate level of BLV being provided to the site owner.

MVR ES16 provides commentary from Examiners reports which indicate that *"landowners must consider reducing their land values for schemes to be both viable and deliverable"*, however, in line with PPGV¹⁴, it is essential that *"the premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land."* This means that

⁹ MHCLG National Planning Policy Framework ('NPPF') (as amended in July 2021)

¹⁰ MHCLG Planning Practice Guidance for Viability ('PPGV') (as amended in December 2024)

¹¹ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 010 Reference ID: 10-010-20180724

¹² MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 002 Reference ID: 10-002-20190509

¹³ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 020 Reference ID: 10-020-20180724

¹⁴ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 013 Reference ID: 10-013-20190509

land values should not be reduced to zero or near zero if they are subject to abnormal costs, as they would not get released for development.

3.3 Worst Case Scenario Appraisals

MVR ES19 states “we have prepared a set of fully policy compliant appraisals where all policy costs are ‘layered on’. These appraisals also include generous allowances for land value and profit at 20%”.

This set of appraisals is put forward within the MVR as being on a set of reasonable assumptions but are labelled as the “Worst Case Scenario” which, as previously stated, is somewhat leading wording and the results of this set of testing are ignored in the conclusions of the MVR.

MVR ES21 confirms the difficulties of development in the current market, including build cost inflation, interest rates and market values which negatively influence viability outcomes.

3.4 Pragmatic Scenario Appraisals

Despite these difficulties, amendments are made to the base level, “Worst Case Scenario” viability assumptions in order to reflect a “Pragmatic”, approach which it is stated that a developer may adopt.

This wording is regarded as weak, as no evidence is provided to support the revised appraisal assumptions, which mostly divert from standard levels for Local Plan viability assessment which must include a level of buffer to ensure that policies are not based on assumptions which are less than reasonable.

The “Worst Case Scenario” assumptions adopt lower quartile costs for schemes of 51+ units and median BCIS cost for smaller schemes, profit is at 20% on open market sales, BLVs range from £150-£275,000 per net developable acre and densities are at 21-35 dwellings per hectare dependent upon location.

The Pragmatic approach adopts lower quartile costs for all developments, profit is reduced to 18% on open market sales, benchmark land values are reduced to £100,000 net developable acre across lower and medium value zones and densities are increased to 35 dwellings per hectare for all typologies.

The use of lower quartile BCIS costs for all developments does not align with market reality, where smaller regional/local developers undertaking schemes of 50 or less units do not benefit from the efficiencies of larger scale developers who can potentially build at rates similar to BCIS lower quartile. It is essential that small schemes continue to be assessed at BCIS median levels.

The reduction of profit from 20% to 18% on open market sales values has a significant positive impact upon the viability assessments.

No evidence is provided to support the reduction to 18% profit whereas we are aware of numerous appeal decisions and Local Plan/CIL viability assessments which adopt a 20% profit allowance. It is widely recognised that, especially considering current market conditions, a 20% profit on market sales value is required by national housebuilders in order to satisfy Board and shareholder requirements whilst there may be a limited amount of flex for smaller developers.

Any profit below company requirements is likely to lead to no board sign off, leading to delays in delivery, which goes against the current government’s narrative and targets.

In respect of BLVs, the application of benchmark land value to the net developable area is regarded as contrary to landowner expectations, as they will require payment for the full extent of their gross land area.

A “pragmatic” £100,000 per net acre allowance within the “pragmatic” testing reduces the benchmark land value well below the £100,000 per gross acre which we regard as an absolute minimum for the largest strategic sites no matter what level of abnormal costs would apply.

A £100,000 per gross acre benchmark land value is regarded as an absolute minimum level which would apply only to the very largest sites and the much smaller sites which are assessed within the MVR require uplifts to ensure that a landowner is incentivised to sell their land for development.

Density is increased from 21, 28, and 35 dwellings per hectare dependent upon location of development to 35 dwellings per hectare for all developments.

From our calculations, 35 dwellings per hectare increases the development density to 16,077 sq ft per acre.

16,077 sq ft per acre is what we would expect to see in lower value locations only. It must be anticipated that the number of larger unit types will increase with increasing values but that densities will reduce, with c.15,000 sq ft per acre applicable in medium value areas and 14-14,500 sq ft per acre in higher value areas.

Whilst we agree that 35 dwellings per hectare is a reasonable average level, either the development typology or density must be varied to reflect the value area to ensure that an appropriate sq ft per acre is applied.

It is not stated in the MVR, but densities must be calculated based on the net developable site area.

3.5 Viability Results and Commentary

MVR ES27 states: “Our viability appraisals align with the proposed affordable housing figures set out in the draft Central Lancashire Local Plan. This is based on our assessment of pragmatic development scenarios, which factor in reduced developer profit, lower benchmark land values (BLV), and increased densities to enhance viability. These adjustments reflect a realistic approach to balancing policy aspirations with deliverability, ensuring that affordable housing requirements remain achievable within the current market context.

Settlement Hierarchy	Affordable Housing Policy
Tiers 1, 2 and 3	30%
All other locations	35%

It appears that the MVR draws its conclusions only from the “Pragmatic Scenario” testing results which includes insufficient construction costs for smaller schemes, insufficient profit, insufficient benchmark land values and excessive densities.

The reported results are not regarded as reliable or based upon fully evidenced viability testing and the policy requirements for 30% or 35% affordable housing are unsupported by the Councils’ evidence.

MVR ES29 states: “our viability appraisals demonstrate that medium and higher value greenfield sites, both within and outside settlement boundaries, are viable. Higher value brownfield sites within settlements also show viability although they become marginal in out of settlement locations. Medium value brownfield sites are assessed as marginal both within and outside settlements.” All typologies within lower value zones are unviable along with typologies assessed within Preston City Centre.

Out of the 37 Pragmatic Scenario viability tests, only 38% are shown to be viable, with the nine marginal schemes showing viability deficits of between -£5,720 to -£90,405. It is stated that the marginal schemes only require minor shifts in market conditions, but, in line with current evidence, it is highly likely that construction cost increases will outweigh other possible beneficial amendments, reducing the likelihood that schemes will move from marginal to viable.

It is clear that the majority of development within Central Lancashire, even adopting the “Pragmatic Scenario” assumptions is not viable and it is essential that any emerging Local Plan includes the ability for applicants to submit a site specific viability assessment in order to adjust affordable housing and/or S106 contributions dependent upon the circumstances of each site.

The need for site specific viability assessment is recognised within MVR ES38, which states “it is recognised that the schemes do need a flexible approach to considering viability, and this is also reflected in the acceptance of zero affordable housing on past site specific schemes along with a reduced CIL rate in the inner Preston zone.”

3.6 Strategic Site Conclusions

The MVR states that limited information was provided by stakeholders involved in the four strategic sites which had been identified by the Councils. The limited information provided probably relates to the relatively early stages of development and CMA and contractual confidentiality, and the MVR states “it is not possible to state with certainty at this stage whether the sites are deliverable.”

The Fulwood Barracks site is assessed as “not viable”, Pickerings Farm site is assessed with a “viability gap”, West Preston is “currently showing as unviable” and North West Preston/Bartle “is currently showing as marginal at this stage”, however, this site generates a viability deficit of -£39,529,507 and is shown to be unviable.

3.7 Planning Practice Guidance for Viability

Within MVR Table 2.2 it is stated that the Policy HS6 – Housing Mix and Density ensures there is an adequate supply of housing for an aging population and for people with disabilities. Part M4(2) and M4(3) typologies are described and costed but the percentage of such units that has been adopted within the testing is not stated and clarification is requested.

3.8 Central Lancashire Local Plan 2041

The drafting of Policy HS7 – Affordable Housing is stated to be “an iterative process having regard to the results of the viability appraisals and specifically the sensitivity appraisals” this indicates that the results of both the “Worst Case Scenario” and “Pragmatic Scenario” are insufficient to support Policy HS7 and there is a need to flex from the stated assumptions by way of sensitivity analysis.

As a result, it is essential that the Local Plan includes provisions for site specific viability testing due to the lack of policy viability shown within the Council’s evidence.

Policy EN6 – Bio Diversity Net Gain Costs are stated to be in line with the DEFRA Impact Assessment Bio Diversity document dated 2019. It is not clear whether these costs have been index linked to bring them up to current levels and clarification is requested.

It is noted that costs in respect of the provision of open space and trees, woodlands and hedgerows are included in the external works cost allowance. These costs do not fall within standard external works provisions and must be included as an abnormal allowance.

3.9 Benchmark Land Value (BLV) Approach

It is agreed that existing use value plus a premium is the core method of determining a BLV, as prescribed within PPGV. However, as stated in MVR 4.13, “*land transaction evidence should only be used as a cross-check to the EV plus premiums*”.

Land transaction evidence is regarded as an important factor, which is given little consideration within the MVR.

MVR 4.16 states “*one therefore has to ‘triangulate’ the BLV based on evidence*”.

MVR 4.19 states “*it becomes evident that landowners must consider reducing their land values for schemes to be both viable and deliverable, particularly in the context of providing affordable housing.*”

There is a clear push within the MVR to minimise the level of BLV, as evidenced by the reduction to £100,000 per net acre for low and medium value sites within the “*Pragmatic Scenario*” testing.

As previously stated, the MVR provides greenfield residential site sales evidence from six sites with four ranging from 0.25 – 0.6 acres, one at 6.8 acres with no price shown, and one at 36 acres with the sale price equating to £58,611 per gross acre.

It is noticeable that the comparables are provided on a value per gross acre, rather than per net acre, as adopted for the benchmark land value setting. A value per gross acre is regarded as appropriate and should be adopted for benchmark land values.

It is surprising that AV have not been able to source more appropriate comparable data from larger sites. We are aware of the following land sales, which have been derived from publicly available information on planning portals and Land Registry:

Location	Purchaser	Data Acquired	Price Paid (ex VAT)	Gross Acres	£/Gross Acre	Planning Ref(s)	Units (Total/Market/Affordable)
Nell Lane, Clayton le Woods	Rowland Homes Limited	22/07/2024	£4,250,000	8.19	£518,925.52	24/00421/FULMAJ	97/68/29
Doctors Lane, Eccleston	Redrow Homes Limited	16/05/2024	£1,800,346	7.57	£237,826.42	20/01331/OUTMAJ 22/00748/REMAJ	65/42/23
Euxton Lane, Euxton	Bellway Homes Limited	19/05/2023	£4,405,000	7.52	£585,771.28	21/01475/FULMAJ	108/76/32
Parr Lane, Eccleston	Anwyl Construction Company Limited	03/09/2022	£4,055,469	3.04	£1,334,035.86	20/01193/OUTMAJ	34/22/12
Riversway, Preston	Bloor Homes Limited	04/08/2022	£13,327,000	38.13	£349,514.82	06/2018/0885 06/2022/1177	280/196/84
Bellefield Close, Lostock Hall	Seddon Homes Limited	02/03/2022	£1,801,800	4.7	£383,361.70	07/2021/00665/FUL	63/44/19
Pear Tree Lane, Euxton	Rowland Homes Limited	06/10/2021	£9,000,000	18.3	£491,803.28	19/00654/OUTMAJ 21/00635/REMAJ 22/00792/REMAJ	149/104/45

The achieved sales values equate to a wide range from £237,826 - £1,334,036 per gross acre, averaging at £441,848 per gross acre. Two of the sites are located in medium value areas, achieving £383,362 - £563,409 per gross acre and five are in higher value areas, achieving £237,826 - £1,334,036 per gross acre. All are greenfield sites.

The MVR adopts BLVs at £150,000, £200,000 and £250,000 per net acre on low, medium and high value areas respectively and, as a cross-check the transactional evidence strongly suggests that the adopted BLVs are too low by a relatively significant margin.

It is regarded as essential for the Local Plan to be drafted with reference to land transaction evidence and the Councils are requested to ensure that BLVs for viability testing purposes are set appropriately.

- The MVR is also clear that the assessment of BLV included does not allow for abnormal costs which contradicts the PPG and RICS guidance, with PPGV stating¹⁵ that “As far as possible, costs should be identified at the plan making stage.” “Costs include: build costs based on appropriate data, for example that of the Building Cost Information Service abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value.”

The intention of the PPG is for BLVs to be set at the plan making stage, and for these BLVs to inform what level of policy is deliverable. This means that the minimum return to the landowner should be factored in when testing and setting policies that affect development viability.

The PPG also states the following at Paragraph 010:

“In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission.”

The factors that are considered within a BLV can evidently be at odds with each other, with the landowner, planning authority and developer all seeking a return, which in turn affects the return of another. There is therefore a need to ‘strike a balance’.

When viability is constrained, the reality is that a scheme cannot deliver everything in combination i.e. it cannot deliver a sufficient landowner return, and allow for all abnormal costs, and deliver full policy compliance, and provide an appropriate risk adjusted return to the developer.

Local plan viability testing should set the minimum ‘cut-off’ point at which a reasonable landowner should expect to receive for their land and not be subject to further adjustments. It is already evident the BLVs adopted are too low and cannot be reasonably adjusted downwards any further. On the basis, the MVR is not compliant with the PPG and should be amended accordingly.

MVR Appendix 4 provides comparable data in respect of brownfield sites, with nearly all significantly exceeding the BLVs adopted in the MVR. In our opinion, the brownfield BLV should be adopted with reference to comparable employment land transaction data and this does not

¹⁵ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 014 Reference ID: 10-012-20240214

appear to be referenced within the MVR and there is a strong danger that the adopted brownfield BLVs are insufficient.

In the MVR “*Conclusions on BLV*” it is stated that in line with PPGV it is clear that the BLV “*must reflect the cost of complying with policies*”. The greenfield land value transaction evidence provided herein are all on a policy compliant basis and must be taken into account when setting the greenfield benchmark land value.

The MVR makes a number of references to a BLV caveat, which states that “*the BLVs contained herein are for ‘high-level’ Plan viability purposes*” ...and... “*no way implies that this figure can be used by applicants to negotiate site specific planning applications*”. This approach is contrary to Planning Practice Guidance: Viability (“PPGV”) which states “*Where a viability assessment is submitted to accompany a planning application this should be based upon and refer back to the viability assessment that informed the plan*”.

Therefore, the Local Plan viability BLV must be regarded as an appropriate source of opinion for BLV setting. However, it is necessary for BLVs to be increased, with reference to policy compliant land transaction evidence.

3.10 Residential Typologies

3.10.1 Unit Size Assumptions

The draft Local Plan includes a requirement for housing to be provided in line with Nationally Described Space Standards (“NDSS”). The MVR provides a breakdown of NDSS requirements and the adopted unit sizes for 1 and 2-bed flats and 2, 3 and 4-bed houses do align with NDSS requirements albeit the largest 4-bed is larger than the NDSS requirements for a 4-bed 8-person house. As average unit sizes, the adopted sizes are reasonable albeit there is scope to reduce the size of the 4-bed house.

3.10.2 Unit Mix

The MVR adopts the same unit typology for all testing of housing developments in low, medium and higher value areas, including 7% 1 and 2-bed apartments. It should be anticipated that unit typologies will vary, depending upon the value location and site type with more terraced and semi-detached homes of smaller sizing in lower value areas and more detached of larger sizing in higher value areas.

The adoption of 7% apartments within a standard housing mix is contrary to market expectations, with very few new build developments including apartments. We are not aware of any housing study data which suggests that 7% apartments should be provided within housing developments and this assumption should be amended. Generally speaking, on housing sites of any scale, above 10 units, we would not expect there to be open market demand for 1 and 2 bedroom apartments outside of town centre locations.

Re-testing using more appropriate unit mixes is required.

3.10.3 Density

The “*Worst Case Scenario*” testing applies densities in line with those set out within the draft Local Plan, which is regarded as appropriate, however, the MVR “*Pragmatic Scenario*” testing increases densities from 21-27 units per hectare to 35 units per hectare. This is regarded as excessive for medium and high value locations as the sq ft per acre development density is excessive at 16,077 sq ft per acre.

3.10.4 Site Net to Gross Ratio

A brownfield net to gross ratio of 100% is adopted, with greenfield at 75%. No reasoning is provided for this significant alteration.

Whilst a 100% net to gross ratio may apply to apartments (albeit more likely to be c.95%) the MVR tests traditional housing developments on brownfield bases and it is essential for the required provision of public open space to be taken into account and brownfield developments should adopt the same 75% net to gross ratio as greenfield sites.

3.10.5 Housing Value Zones

A relatively detailed Residential Market Paper is attached at MVR Appendix 3, providing extensive information in respect of new build sales from the past two years and re-sales from the past three years.

Asking prices are also set out for schemes in Preston, South Ribble and Chorley, comprising a total of 42 schemes. Unfortunately, this data is of limited credibility or usefulness due to the lack of £ per sq ft assessments for 17 (42%) of the comparable schemes provided. No discussion of asking price £ per sq ft is provided in the MVR.

No reference is made to the necessary reduction from asking prices in order to reflect purchaser negotiation or discounts, which is especially important in respect of lower cost units as the removal of Help to Buy has increased the cost of first time buyer support packages.

This is surprising, as a simple telephone call to each appropriate developer would enable the sq ft for each currently marketed unit type to be provided and for £ per sq ft values to be referenced.

It is difficult to confirm that the sales values adopted in the MVR are appropriate due to the lack of analysis of current asking price £ per sq ft data.

3.10.6 Transfer Values

MVR 5.47 sets out the adopted affordable housing transfer values as follows:

Table 5.8 - Affordable Housing Transfer Values

Tenure	% Mix	Transfer Value (% of MV)	Comments
Social Rented	50%	45%	
Affordable Rented	25%	65%	
First Homes	10%	70%	Capped at £250,000
Shared Ownership	15%	70%	

Source: AspinallVerdi, 2025

Some evidence is provided to support the adopted values, but one of the three registered providers suggests lower values, which are more in line with our expectations, following our discussions with registered providers of affordable housing, with social rent at 40% of MV, affordable rent at 50%. We accept shared ownership at 70% of MV. We request that affordable housing values should be reduced.

3.10.7 S106 / CIL Cost Assumptions

The S106 cost applied to public open space is referenced earlier in the MVR, with information drawn from each Council area to provide an average S106 cost. However a £7,000 per unit education contribution is adopted without evidence or explanation and this is requested.

3.10.8 “Worst Case Scenario” Construction Cost Assumptions

- Site clearance, demolition & remediation - £50,000 per acre if brownfield based on similar WPV studies.

“WPV studies” are not defined, but we understand this to mean “Whole Plan Viability studies”. This allowance is regarded as acceptable for a generic typology.

No abnormal costs are applied to greenfield sites. This is regarded as unrepresentative of reality, with all sites incurring a level of abnormal costs whether brownfield or greenfield.

- Site infrastructure costs – included in external works for generic typologies. This is acceptable on the basis that many sites infrastructure costs would be regarded as abnormal and would provide justification for the provision of a site specific viability assessment.
- House construction (medium house builder up to 50 units) - £1,504 per sq m (£139.74 per sq ft). This is in line with BCIS Median costs and is regarded as acceptable.
- House construction (larger house builder 51+ units) - £1,328 per sq m (£123.37 per sq ft). This is based on the BCIS Lower Quartile data and is regarded as acceptable.
- Flats / Apartment construction - £1,740 per sq m (£161.65 per sq ft). This is described as BCIS Category: Flats. BCIS data is separated into a number of assessments based on storey height and confirmation of the storey height adopted is requested.
- Garages - £8,000 per garage. We have recently received confirmation from a quantity surveyor following their assessment of national housebuilder garage construction costs that £12,500 per garage is required and this cost requires increase.
- External works – 10% - 15%, stated to be a standard assumption dependant on typology. It is assumed that a 10% allowance is adopted for flatted development and 15% for houses. If this is the case, these assumptions are regarded as acceptable.
- M4(2), M4(3) and biodiversity net gain – costs adopted in line with nationally published documents. Costs are regarded as appropriate if it can be confirmed that they have been inflated to current day levels.
- EV charging – no cost is applied on the basis that it is incorporated into BCIS costs on the basis that “EV charging points have been required on all new homes (Part S) since 2022”.

The requirement for electric charging points is recent and BCIS acknowledge that they rely on historic data and charging costs will not have worked their way into the average cost data set. A separate cost allowance is required.

MVR 5.52 states that the above costs are considered to be representative of a “worst-case scenario” and, confusingly, the MVR references scope for some flexibility and pragmatism to the application of the policies in the Plan.

No reference is made in the MVR to costs relating to the Building Safety Levy and removal of Red Diesel, which we are informed has increased the duty paid by developers on fuel five-fold. These are costs to any residential developer and must be taken into account.

3.10.9 Other Cost Assumptions

- Contingency – 3% for greenfield and 5% for brownfield. These costs are regarded as acceptable.
- Professional fees – 6.5%. It is assumed that professional fees are applied at 6.5% to the base construction cost, although they should also be added to abnormal costs where appropriate. The costs are stated to be “based on recent evidence and industry standard assumptions”. A 6.5% allowance is regarded as an absolute minimum allowance which may be regarded as a minimum cost for a national housebuilder, but developers of smaller sites of 50 units or less are unlikely to have standard unit typologies and will have increased architect fees and an 8% professional fees allowance is regarded as appropriate for smaller schemes.
- OMS marketing and promotion – 1.5% - 2% of OMS GDV. The MVR states that higher costs are applied to larger sites but the scale of larger sites is not referenced and is requested. A 2% allowance is regarded as a minimum.
- Sales agents – 1%. Acceptable.
- Sales legal fees - £500 per unit. This is regarded as insufficient, with commonly accepted legal fees at £750 per unit.
- AH disposal - £750 per unit. The AH disposal cost will primarily cover legal fees and consistency with OMS legal fees is acceptable.
- Debit interest – 7.5%. Considering the current base rate, a debit interest charge of 8% is regarded as a minimum allowance.
- Profit on market sales – 20% Acceptable
- Profit on affordable housing – 6%. This is stated to be a standard assumption but, in our opinion, following discussions with registered providers of affordable housing, we regard this as insufficient and an 8% allowance is appropriate.

3.10.10 Residential Land Value Assumptions

The MVR adopts benchmark land values as follows:

Table 5.13 - Benchmark Land Value Assumptions

Typology	Location	Greenfield / Brownfield						x [X] x [Y]%	(per acre) (net developable) (rounded)	(per ha) (net developable) (rounded)
			(per acre) (gross)	(per ha) (gross)	Net: Gross (%)	(per acre) (net)	(per ha) (net)			
Residential	Low Value Area	Greenfield	£10,000	£24,710	75%	£13,333	£32,947	10.3	£150,000	£370,650
Residential	Medium Value Area	Greenfield	£10,000	£24,710	75%	£13,333	£32,947	14.0	£200,000	£494,200
Residential	High Value Area	Greenfield	£10,000	£24,710	75%	£13,333	£32,947	17.8	£250,000	£617,750
Residential Strategic Sites	Borough-wide	Strategic Greenfield	£10,000	£24,710	60%	£16,667	£41,183	9.0	£166,666	£411,832
Residential/Commercial	Low Value Area	Brownfield	£140,000	£345,940	100%	£140,000	£345,940	7.1%	£150,000	£370,650
Residential/Commercial	Medium Value Area	Brownfield	£190,000	£469,490	100%	£190,000	£469,490	10.5%	£210,000	£518,910
Residential/Commercial	High Value Area	Brownfield	£240,000	£593,040	100%	£240,000	£593,040	14.6%	£275,000	£679,525

The above values are for Plan-making purposes only. This table should be read in conjunction with our Financial Viability Assessment Report and the caveats therein. No responsibility is accepted to any other party in respect of the whole or any part of its contents.

Source: AspinallVerdi, 2025

Commentary on Benchmark Land Values is provided separately, herein.

3.11 Viability Results

3.11.1 Residential Viability Results

MVR 6.5 states that the “worst case scenario” viability testing includes “generous allowance for land value and profit.” The adopted land values are regarded as insufficient and the “Worst Case Scenario” profit is acceptable and in line with national housebuilder requirements.

Results of each brownfield and greenfield test on a “Worst Case Scenario” and “Pragmatic Scenario” are set out within MVR 6.16 – 6.121.

Unfortunately, many of the reported appraisal results do not match the results which are shown on the summary tables on MVR pages 72 – 100.

For example, the lower value brownfield – “Worst Case Scenario” reports an RLV for the 30 unit within settlement scheme at -£694,852 per acre and a deficit of -£844,8442 per acre. The appraisal summary table reports a RLV of -£669,911 per acre and a deficit of -£819,911 per acre. Also the 100 unit scheme within the settlements is in incorrect, meaning that 50% of the reported values are wrong.

For the Preston City Centre testing, five of the reported seven (71%) RLVs and deficits are incorrect.

It appears that the actual RLVs are improved from those included within the reporting, meaning that reductions in build costs and grant required as stated in the MVR will be slightly reduced when the values are corrected.

This is regarded as a significant issue, calling into question the credibility of the MVR and the conclusions reached therein.

We have drawn appraisal results from Appendix 8, as follows:

Worst Case Scenario								
Value Area	Location	AH	Scheme (units)	RLV per acre	Deficit per acre	AV Category	Build Cost Decrease Reqd	Grant Reqd (£ per unit)
Medium Value Brownfield	Town & District Centre	30%	100	£11,637	-£198,363	Marginal	10%	15,000
Medium Value Greenfield	Outside Settlement	35%	100	£26,697	-£173,303	Marginal	10-15%	25,000
Higher Value Greenfield	Outside Settlement	30%	100	£166,839	-£205,492	Marginal	10%	15,000
Higher Value Brownfield	Outside Settlement	35%	100	£89,705	-£185,295	Marginal	10%	15,000
Higher Value Brownfield	Within Settlements	30%	50	£158,238	-£116,762	Marginal	10%	20,000
Higher Value Brownfield	Within Settlements	30%	100	£169,605	-£105,395	Marginal	15	25,000
Medium Value Greenfield	Within Settlement	30%	8	£9,236	-£190,764	Marginal	20-25%	45,000
Medium Value Greenfield	Within Settlement	30%	75	£20,364	-£179,636	Marginal	15%	20,000
Medium Value Greenfield	Within Settlement	30%	150	£37,325	-£162,675	Marginal	10%	20,000
Medium Value Greenfield	Within Settlement	30%	350	£47,516	-£152,484	Marginal	Not stated	Not stated
High Value Greenfield	Not Stated	30%	8	£232,658	-£17,342	Marginal	2-3%	Not stated
High Value Greenfield	Not Stated	30%	75	£193,389	-£56,611	Marginal	5%	Not stated
High Value Greenfield	Not Stated	30%	150	£207,917	-£42,083	Marginal	5%	Not stated
High Value Greenfield	Not Stated	30%	350	£216,235	-£33,765	Marginal	Not stated	Not stated
Lower Value Brownfield	Town & District Centre	30%	30	-£961,727	-£1,111,727	Not Viable	35%	70,000
Lower Value Brownfield	Town & District Centre	30%	100	-£515,965	-£665,965	Not Viable	25%	40,000
Lower Value Brownfield	Within Settlements	35%	30	-£669,911	-£819,911	Not Viable	40%	70,000
Lower Value Brownfield	Within Settlements	35%	100	-£370,054	-£520,054	Not Viable	25%	50,000
Preston City Centre	Preston City Centre	30%	8	-£1,235,089	-£1,385,089	Not Viable	15-20%	40,000
Preston City Centre	Preston City Centre	30%	30	-£1,852,215	-£2,002,215	Not Viable	30%	55,000
Preston City Centre	Preston City Centre	30%	50	-£937,822	-£1,087,822	Not Viable	20%	30,000
Preston City Centre	Preston City Centre	30%	100	-£888,365	-£1,038,365	Not Viable	20%	Not stated
Preston City Centre	Preston City Centre	30%	8	-£1,923,911	-£2,073,911	Not Viable	25%	55,000
Preston City Centre	Preston City Centre	30%	30	-£2,426,256	-£2,576,256	Not Viable	25%	55,000
Preston City Centre	Preston City Centre	30%	50	-£1,798,042	-£1,948,042	Not Viable	Not stated	50,000
Medium Value Brownfield	Outside Settlement	35%	100	-£54,250	-£264,250	Not Viable	20%	35,000
Medium Value Brownfield	Within Settlements	30%	20	-£319,549	-£529,549	Not Viable	30%	55,000
Medium Value Brownfield	Within Settlements	30%	50	-£28,090	-£238,090	Not Viable	20%	30,000
Medium Value Brownfield	Within Settlements	30%	100	-£12,037	-£222,037	Not Viable	Not stated	Not stated
Higher Value Brownfield	Within Settlements	30%	20	-£110,058	-£385,058	Not Viable	20%	45,000
Lower Value Greenfield	Outside settlement	35%	8	-£396,095	-£550,000	Not Viable	35	65,000
Lower Value Greenfield	Outside settlement	35%	30	-£1,953,254	-£2,100,000	Not Viable	35%	70,000
Lower Value Greenfield	Outside settlement	35%	75	-£311,335	-£460,000	Not Viable	25%	45,000
Lower Value Greenfield	Outside settlement	35%	150	-£299,785	-£450,000	Not Viable	25%	45,000
High Value Greenfield	Not Stated	30%	30	-£58,250	-£308,250	Not Viable	20%	35,000
Medium Value Greenfield	Within Settlement	30%	30	-£259,967	-£459,967	Unviable	25%	45,000

It is noted that 10 of the “Marginal” schemes generate viability deficits of more than -£150,000 per acre and these should be labelled “Not Viable”, as follows:

Value Area	Location	AH	Scheme (units)	RLV per acre	Deficit per acre	AV Category
Low Value Brownfield	Town & District Centre	30%	30	-£480,524	-£580,524	Not Viable
Low Value Brownfield	Town & District Centre	30%	100	-£455,396	-£555,396	Not Viable
Low Value Brownfield	Within Settlement	35%	30	-£344,605	-£444,605	Not Viable
Low Value Brownfield	Within Settlement	35%	100	-£329,170	-£429,170	Not Viable
Preston City Centre	Preston City Centre	30%	8	£121,250	£21,250	Viable
Preston City Centre	Preston City Centre	30%	30	-£822,832	-£922,832	Not Viable
Preston City Centre	Preston City Centre	30%	50	-£807,599	-£907,599	Not Viable
Preston City Centre	Preston City Centre	30%	100	-£758,142	-£858,142	Not Viable
Preston City Centre	Preston City Centre	30%	8	-£828,093	-£928,093	Not Viable
Preston City Centre	Preston City Centre	30%	30	-£1,548,211	-£1,648,211	Not Viable
Preston City Centre	Preston City Centre	30%	50	-£1,709,606	-£1,809,606	Not Viable
Medium Value Brownfield	Within Settlement	35%	100	£57,905	-£42,095	Marginal
Medium Value Greenfield	Outside Settlement	35%	100	£9,595	-£90,405	Marginal
Medium Value Brownfield	Within Settlement	30%	20	£22,056	-£77,944	Marginal
Medium Value Brownfield	Within Settlement	30%	50	£40,740	-£59,260	Marginal
Medium Value Brownfield	Town & District Centre	30%	100	£73,971	-£26,029	Marginal
Higher Value Brownfield	Outside Settlement	35%	100	£239,270	-£35,730	Marginal
Higher Value Brownfield	Within Settlement	30%	20	£264,218	-£10,782	Marginal
Higher Value Brownfield	Within Settlement	30%	50	£279,277	£4,277	Viable
Higher Value Brownfield	Within Settlement	30%	100	£294,002	£19,002	Viable
Low Value Greenfield	Not Stated	35%	8	£33,592	-£66,408	Marginal
Low Value Greenfield	Not Stated	35%	30	-£218,440	-£318,440	Not Viable
Low Value Greenfield	Not Stated	35%	75	-£202,020	-£302,020	Not Viable
Low Value Greenfield	Not Stated	35%	150	-£181,494	-£281,494	Not Viable
Low Value Greenfield	Not Stated	35%	350	-£159,550	-£259,550	Not Viable
Medium Value Greenfield	Within Settlement	30%	8	£413,443	£313,443	Viable
Medium Value Greenfield	Within Settlement	30%	30	£109,941	£9,941	Viable
Medium Value Greenfield	Within Settlement	30%	75	£123,236	£23,236	Viable
Medium Value Greenfield	Within Settlement	30%	150	£145,159	£45,159	Viable
Medium Value Greenfield	Within Settlement	30%	350	£158,174	£58,174	Viable
Medium Value Greenfield	Outside Settlement	35%	100	£94,280	-£5,720	Marginal
High Value Greenfield	Within Settlement	30%	8	£694,347	£444,347	Viable
High Value Greenfield	Within Settlement	30%	30	£345,373	£95,373	Viable
High Value Greenfield	Within Settlement	30%	75	£359,806	£109,806	Viable
High Value Greenfield	Within Settlement	30%	150	£378,713	£128,713	Viable
High Value Greenfield	Within Settlement	0.3	350	£389,534	£139,534	Viable

3.12 Strategic Sites Assessment Appraisals

Four strategic sites are stated to have been viability tested, but no copies of the associated viability appraisals are provided within the MVR, so it is not possible to cross-check the stated results.

It is stated that limited information was provided by the stakeholders involved with the sites but they are at early stages of their development and it can be appreciated that limited information would be available and will be subject to confidentiality via option agreements.

MVR 7.24 states “without transparency on minimum land values it is not possible to state with certainty at this stage whether the sites are deliverable.”

However, adopting a BLV equating to £166,666 per net acre, the RLVs for the strategic sites range from £26,108 to -£984,565 per acre and the viability deficits are stated as -£20,273,610 to -£71,609,930.

Despite the need to use generic costs for the strategic sites it is clear that the viability assessments within the MVR are unviable.

MVR Table 7.2 – Strategic Site Appraisal Summary includes many appraisal inputs as “XXXXX” rather than including actual numbers. It is not, therefore, possible to determine the inputs adopted to assess the reported deficits. Again, the credibility of the MVR is reduced due to this lack of transparency. This approach does not comply with the transparency requirements of PPGV¹⁶

3.12.1 Conclusions and Recommendations

Conclusions are drawn from the “*Pragmatic Scenario*” testing, with no reference to the “*Worst Case Scenario*” testing.

This is not regarded as appropriate, as the pragmatic scenario testing includes assumptions which are not appropriate for Local Plan viability testing.

Local Plan viability testing should include a buffer to ensure that policy provisions will not impact on the deliverability of sites.

The strategic site conclusion again states that “*without transparency on minimum land values, it is not possible to state with certainty at this stage whether the sites are deliverable.*”

However, the viability testing does include BLVs at £166,666 per net acre. As referenced earlier, BLVs must relate to the gross site area and strategic sites will have a much reduced net : gross site differential due to the provision of additional public benefits.

It is clear from the very significant viability deficits that the sites are not viable.

The North West Preston / Bartle site generates a deficit of £39,529,507 and MVR 10.12 states that “*the site is currently showing as marginal at this stage.*” This comment appears highly inappropriate as the tested scheme is unviable.

It is essential that the Local Plan includes provisions for site specific viability testing due to the lack of policy viability shown within the Council’s evidence.

¹⁶ MHCLG Planning Practice Guidance: Viability December 2024 Paragraph: 010 Reference ID: 10-010-20180724



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Appendix D – Local Housing Need Assessment

Central Lancashire Housing Need

An assessment of housing need across Preston, South Ribble, and Chorley, covering affordable housing, specialist housing for older people, and employment-driven growth



Revision Schedule

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
1	Draft	NF/RL	20/03/2025	NF/RL	20/03/2025	RB	21/03/2025
2	2 nd draft	RB	01/04/2025				
3	3 rd draft	RB/RL	04/04/2025				
4	Final	RB	08/04/2025				

Disclaimer

The conclusions in the Report titled Central Lancashire Housing Need are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

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Executive Summary

The Central Lancashire Authorities (Preston, South Ribble, and Chorley) are currently consulting on the Publication (Regulation 19) draft of their Local Plan 2023-2041.

This report addresses housing need in the Central Lancashire Authorities and has been prepared on behalf of Story Homes, Wain Homes, Taylor Wimpey, and Persimmon Homes by Stantec Development Economics.

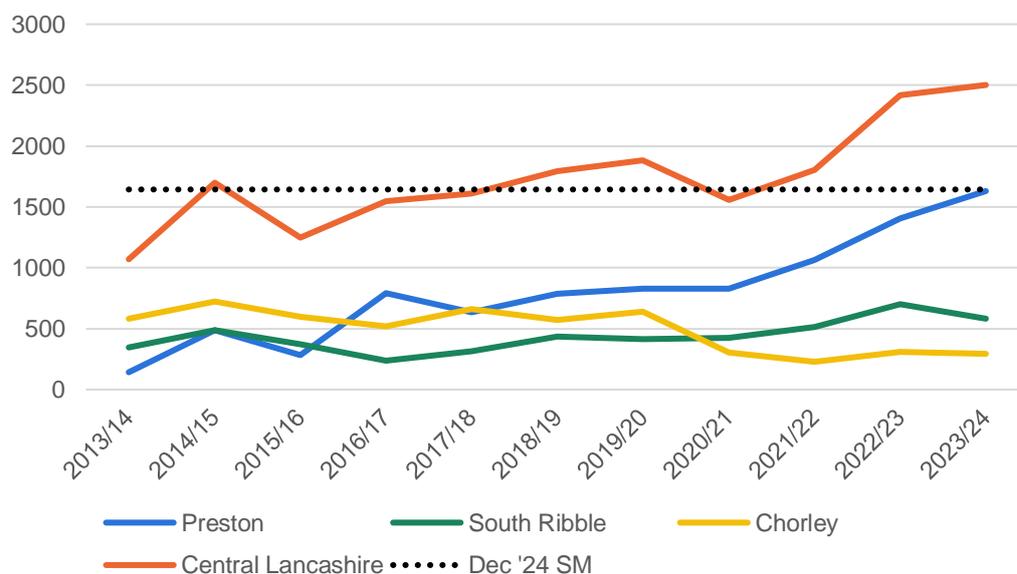
Local Plan Context

The draft Local Plan for the Central Lancashire Authorities has an overall housing requirement of 1,314 dwellings per annum. This is based on:

- A Housing Study Update produced by DLP, in which the preferred scenario gives a housing need of 1,237 dwellings per annum.
- An arbitrary 77 dwellings per annum adjustment to bring the number to 80% of standard method in NPPF2024 (at the time the draft Local Plan was produced), required for the plan to fall under its transitional provisions.

Housing delivery across the Central Lancashire Authorities has risen since 2020/2021, exceeding need identified by the standard method in NPPF2024 since 2021/2022.

Dwellings completion rates in Central Lancashire 2013-2024



Source: 2024 Housing Study Update, Stantec Analysis



Central Lancashire Housing Need Executive Summary

The Housing Study Update arrives at a similar distribution of need between the three authorities to that in standard method from the NPPF as published in December 2024, based on 2023 affordability ratios. This gives a total of 1,643 and was the standard method figure at the time the draft Local Plan was produced. Following the release of 2024 affordability ratios in March 2025, Central Lancashire's figure has slightly increased to 1,662 (reducing the Plan figure % of standard method from 80.0% to 79.1%). 80% of the new figure (1,662) would be 1,330 rather than 1,314.

The draft Local Plan redistributes need according to spatial strategy drivers. As shown below, this results in a substantially lower share of housing delivery in Chorley than implied by the standard method need figures; compared to the other two authorities, it has a much lower need figure than standard method – a 41% difference, with much smaller differences in the other two authorities.

Distribution of housing need comparison

	Preston	South Ribble	Chorley	Total
Standard method NPPF2024	590	489	564	1,643
	36%	30%	34%	
Housing Study Update	441	386	410	1,237
	36%	31%	33%	
Draft Local Plan	520	460	334	1,314
	40%	35%	25%	

Source: Housing Study Update 2024, draft Local Plan, Stantec analysis

Draft Local Plan housing need figures, % difference vs NPPF 2024

	Preston	South Ribble	Chorley	Total
Standard method NPPF2024	590	489	564	1,643
Draft Local Plan	520	460	334	1,314
<i>% difference vs NPPF2024</i>	-12%	-6%	-41%	-20%

Source: Housing Study Update 2024, draft Local Plan, Stantec analysis



Affordable Housing Need

Review of HNDA methodology

The 2022 Housing Need and Demand Assessments (HNDAs) produced by Arc4 for each of the Central Lancashire Authorities include estimates of affordable housing need. These estimates are shown below and give a net annual affordable need of 831 across the three authorities.

Gross and net affordable need summary, Central Lancashire Authorities, HNDA figures

	Preston	South Ribble	Chorley	Total
Current unmet gross need	11,477	1,937	5,511	18,925
After affordability test	6,747	1,937	4,755	13,439
Annualised need	675	387	951	2,013
Newly-arising affordable need	552	406	439	1,397
Total gross need	1,227	793	1,390	3,410
Total supply	831	471	1,277	2,579
Total net need	395	323	113	831

Source: 2022 HNDAs, Stantec analysis

Stantec Development Economics considers that the overarching approach taken to estimating net need – that is to say the steps taken, sources used, and the factors influencing need and supply included – is broadly reasonable. There are, however, some shortcomings. These are:

1. An error in the annualisation of existing households falling into need in Preston
2. The omission of existing households falling into need in South Ribble
3. An over-cautious estimate of demand for affordable home ownership, which excludes those who can afford to privately rent
4. Affordable dwellings vacated in Chorley are estimated using a different method (giving a much higher result) than the other two authorities
5. Non-inclusion of affordable housing stock losses in supply calculations

Adjustments are made to – in our view – improve these estimates. The impact of these adjustments is to increase net need for affordable housing from 831 to 1,364 dwellings per annum across Central Lancashire. Need generated by South Ribble and Chorley increases, and that from Preston decreases. They cover all the points identified above apart from (3), relating to affordable home ownership. Therefore, the updated estimates below still represent a cautious view of need.



Central Lancashire Housing Need Executive Summary

Gross and net affordable need summary, Central Lancashire Authorities, Stantec adjustments

	Preston	South Ribble	Chorley	Total
Current unmet gross need	11,477	1,937	5,511	18,925
After affordability test	6,747	1,937	4,755	13,439
Annualised need	675	387	951	2,013
Newly-arising affordable need	345	505	439	1,289
Total gross need	1,020	892	1,390	3,302
Total supply	794	455	689	1,938
Total net need	226	437	701	1,364
Difference vs. unadjusted	-169	114	588	533

Source: 2022 HNDAs, Stantec analysis

Implications for overall housing delivery

The proportion of affordable need achieved under eight different scenarios is reviewed for each authority individually, and for Central Lancashire overall (for which results are shown below). These scenarios relate to:

- **Affordable net need:** use of Arc4's estimates unadjusted, or Stantec's adjusted versions.
- **Level of overall housing delivery:** the target from the draft Local Plan, or standard method.
- **Affordable housing delivery %:** the historic rate achieved (24.9% across Central Lancashire) or the target rate from the Local Plan (30%).

Affordable net need achieved in Central Lancashire Authorities, for adjusted and unadjusted estimates, overall delivery, affordable delivery achieved

Affordable net need estimates		Overall delivery		Affordable % achieved		Delivered	
						No.	%
Unadjusted	831	Plan	1,314	Historic	24.9%	364	43.8%
				Target	30.0%	394	47.4%
		SM	1,643	Historic	24.9%	441	53.1%
				Target	30.0%	493	59.3%
Adjusted	1,364	Plan	1,314	Historic	24.9%	364	26.7%
				Target	30.0%	394	28.9%
		SM	1,643	Historic	24.9%	441	32.3%
				Target	30.0%	493	36.1%

Source: 2022 HNDAs, Stantec analysis



Looking at the percentage of affordable need met, we see that:

- Using Stantec’s **adjusted** estimates, it’s **between 26.7% and 36.1%** – so in the worst case, a little over a quarter of need is addressed.
- If Arc4’s **unadjusted** estimates are maintained, the picture improves significantly, to **between 43.8% and 59.3%**; though this means that at best, under two-thirds of need is addressed.
- Meeting **standard method** need rather than the Local Plan figure leads – unsurprisingly – to higher proportions of need being met in all cases. For the unadjusted need estimates, and assuming that target delivery rate is achieved, this difference is **11.9% of total need (59.3% compared to 47.4%)**.
- Whether **historic or target** delivery rates are achieved has a significant bearing. At most – using unadjusted estimates and standard method delivery – the difference is **6.3% of total need (59.3% compared to 53.1%)**.

Specialist Housing for Older People Need

The HNDAs estimate need for specialist housing for older people in Central Lancashire. These estimates are summarised below.

2022 HNDA figures for C3 Housing Need

	Preston	South Ribble	Chorley	Total
75+ resident population 2021	9,582	24,415	10,916	44,913
C3 units 2021	3,078	1,508	848	5,434
C3 units/75+ residents in 2021	0.321	0.062	0.078	0.121
75+ resident population 2038	12,913	31,503	16,747	61,163
2021 ratio applied to 2038 75+	4,148	1,946	1,301	7,395
Net need 2021-2038	1,070	438	453	1,961

Source: 2022 HNDAs, Stantec analysis

Stantec Development Economics considers the approach used to be highly simplistic, and flawed in three respects:

1. No evidence-based requirements are used – the HNDAs simply take the current rate of provision and apply it to the future older population. PPG suggests that need can be obtained from online toolkits provided by the sector.
2. Population data for South Ribble appears to have erroneously used those aged 65+ rather than 75+. When applying the 2021 ratio of housing to older residents under the HNDA methodology, this leads to an underestimate of requirement.
3. No housing type or tenure breakdown is included, e.g. between those which do and do not include care services, or those to own or rent.



Central Lancashire Housing Need Executive Summary

Stantec has therefore produced alternative estimates, based on the 'Housing in Later Life' toolkit, which provides suggested prevalence rates per 1,000 people aged 75+ by tenure and broad type. These are shown below, summarising current provision and prevalence, relevant target from Housing in Later Life, and required increase in provision/number of units¹.

Net need to 2038 is 7,409, almost four times higher (or 5,448 more) than the HNDA estimate.

Current and Future Requirements for Specialist Housing for Older People in Central Lancashire

2021					
Specialist Housing Type and Tenure	Current provision (number of units)	Current units per 1,000 residents aged 75+	Target units per 1,000 residents aged 75+	Required Increase or decrease	Resulting number of units
		per 1,000 residents aged 75+			
Rental 'Retirement Housing'	2,695	84	60	0	1,926
Owner Occ. 'Retirement Housing'	957	30	120	2,896	3,853
Rental 'Housing with Care'	259	8	25	544	803
Owner Occ. 'Housing with Care'	92	3	40	1,192	1,284
2038					
Rental 'Retirement Housing'	2,695	58	60	330	2,768
Owner Occ. 'Retirement Housing'	981	21	120	4,555	5,536
Rental 'Housing with Care'	382	8	25	771	1,153
Owner Occ. 'Housing with Care'	92	2	40	1,753	1,845

Source: EAC (2025 Q1), Mid-Year Population Estimates 2022 and Stantec analysis

¹ For all three areas, retirement housing for rent exceeds the housing in life target rates in 2021, however as the demolition of homes would be inappropriate, for the Central Lancashire total this has been represented with 0 as 0 retirement housing for rent is needed. For 2038, retirement housing for rent exceeds the housing in life target rates in South Ribble and Preston. However, as 330 units are required to meet target rates in Chorley the total net need for South Lancashire is 330 for this tenure.



Stantec and Arc4 Gross and Net Specialist Housing Need Figures 2038

	2038 Gross Need			2021 - 2038 Net Need		
	Arc4	Stantec	Difference	Arc4	Stantec	Difference
Preston	4,148	3,303	-845	1,070	2,014	944
South Ribble	1,946	3,905	1,959	438	2,435	1,997
Chorley	1,301	4,094	2,793	453	2,960	2,507
Central Lancashire	7,395	11,302	3,908	1,961	7,409	5,448

Source: 2022 HNDAs, Stantec analysis

Employment-Driven Growth

Employment Scenarios

The Housing Study Update draws heavily on employment forecasts from Cambridge Econometrics in reaching its preferred option. Stantec Development Economics consider this to be a very pessimistic view of growth, as demonstrated by comparison with forecasts for the same period from Oxford Economics. These are higher for all three authorities and show growth of nearly 10,000 more jobs across Central Lancashire between 2023 and 2041.

Jobs growth projections, Cambridge Econometrics and Oxford Economics (2023 – 2041)

Local Authority	2023 - 2041			
	Cambridge Econometrics		Oxford Economics	
	Growth (N)	CAGR Growth (%)	Growth (N)	CAGR Growth (%)
Chorley	5,675	0.60%	5,420	0.65%
Preston	5,493	0.30%	12,070	0.62%
South Ribble	5,492	0.60%	9,060	0.79%
Total	16,660	0.45%	26,550	0.67%

Source: Central Lancashire Housing Study (2024) and Oxford Economics (2025)

Both sets of forecasts are trend-based, and do not include major planned projects – for example the establishment of the National Cyber Force (NCF) headquarters in Samlesbury. They do not therefore account for the additional jobs that would be based in Central Lancashire as a result of such investment, with the area clearly having the opportunity to retain a substantial proportion of the 3,120 jobs estimated to be directly or indirectly created throughout the North West.

Ignoring these jobs equally fails to recognise the need for housing generated by the individuals who fill them, with Turley considering it reasonable to assume that 1,500 of the jobs created by the NCF will be filled by people needing a home nearby.



Central Lancashire Housing Need Executive Summary

Dwellings requirements are calculated to support jobs growth under three scenarios:

- Low: Cambridge Econometrics projections
- Mid: Oxford Economics projections
- High: Oxford Economics projections, plus 1,500 workers to fill jobs directly or indirectly created by the NCF

Dwellings increase estimates from job growth projections (2023 – 2041)

	Assumption	Low (Cambridge)	Mid (Oxford)	High (Oxford + 1,500 (NCF))
Increased employment	N/A	16,660	26,550	28,050
Working in Central Lancs/ From Home	97%	16,092	25,645	27,145
Unemployment Rate	3%	16,519	26,325	27,865
Economically Active Ratio	77%	21,442	34,170	36,169
Dependency Ratio	61%	35,028	55,822	59,087
Residents per dwelling	2.22	15,747	25,094	26,562
Vacancy Rate	3.7%	16,335	26,032	27,555
Local Plan period (per annum) Dwellings per annum	18	907	1,446	1,531

Source: Various, Stantec analysis

The 'Mid' scenario produces annual housing need well in excess of the 1,314 dpa from the draft Local Plan. The 'High' scenario, accounting for the establishment of the NCF, increases it to more than 200 dpa above that requirement.

Property Market Analysis

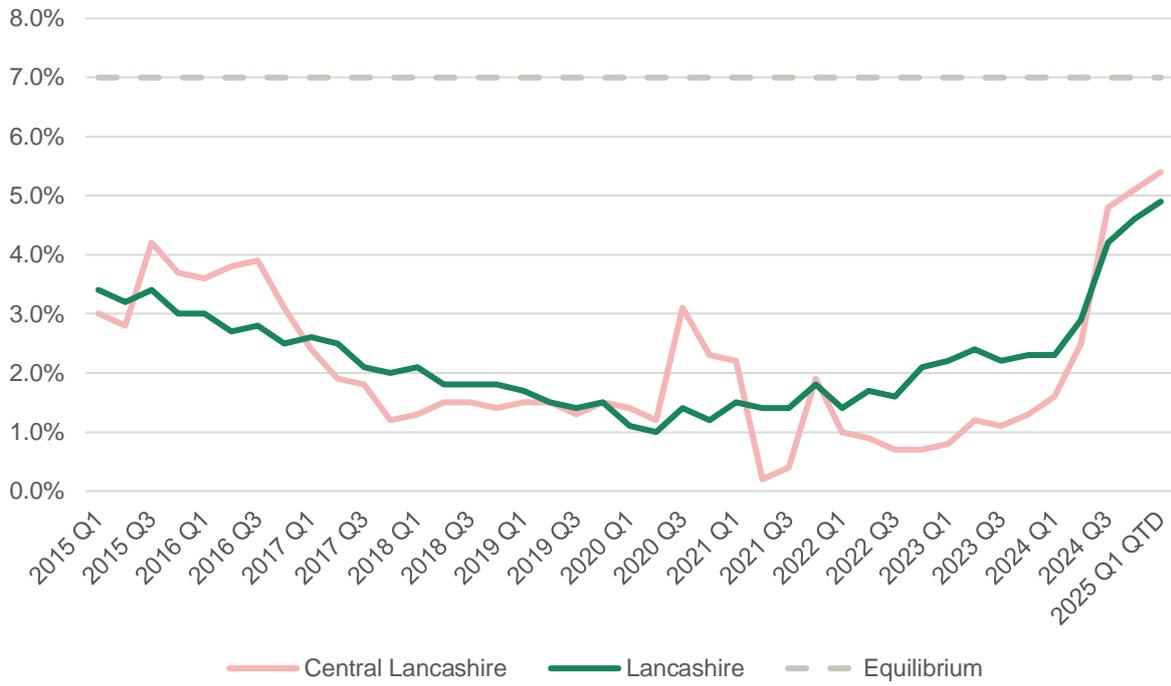
Using CoStar Analytics, we have examined key characteristics of Central Lancashire's property market.

This analysis demonstrates the area's strong economic growth – for example, industrial vacancy and availability rates are both below equilibrium levels, suggesting strong demand for employment space.



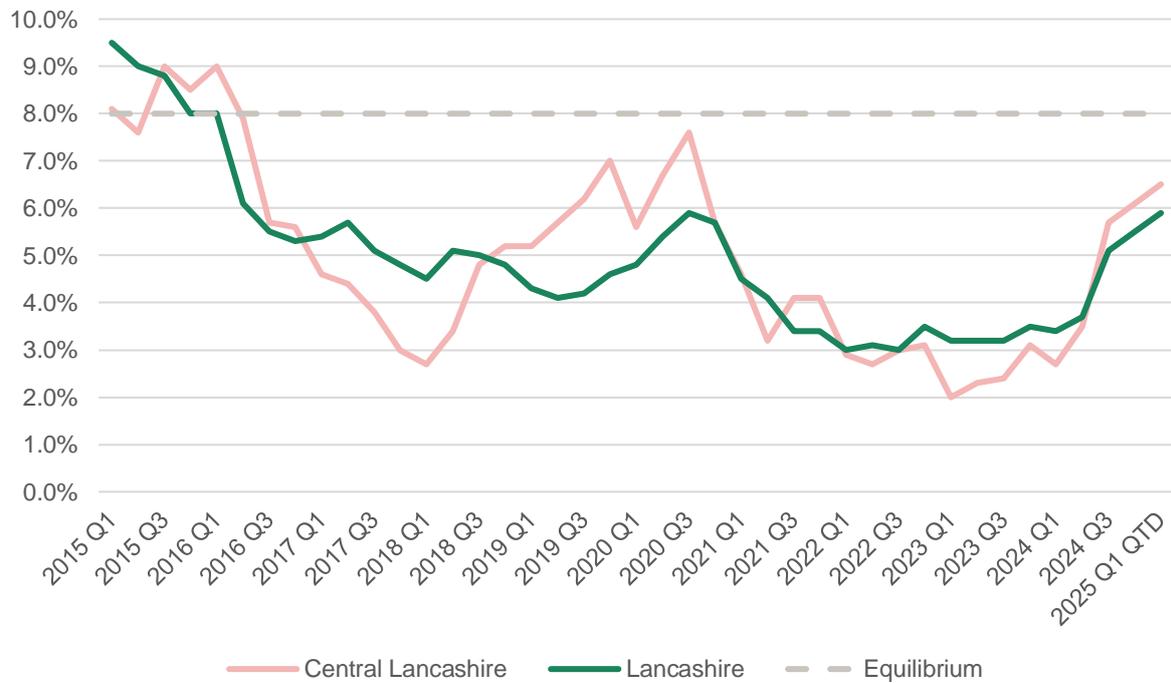
Central Lancashire Housing Need
Executive Summary

Industrial Vacancy Rates Q1 2015 to Q1 2025 QTD



Source: CoStar 2025

Industrial Availability Rates Q1 2015 to Q1 2025 QTD



Source: CoStar 2025



Indicative Housing Need Conclusions

Stantec Development Economics consider that at least NPPF2024 standard method need should be delivered. This is **1,643 dwellings per annum** (split by authority: 590 in Preston, 489 in South Ribble, and 564 in Chorley) or **29,574 over the 18-year plan period**.

Delivering this level of housing would: allow a higher proportion (though still not all) of affordable housing need to be met; ease delivery of specialist housing requirements within overall need; and support continued, sustainable growth of high-tech employment in Lancashire.

Taking forward the lower figure from the draft Local Plan would compromise these objectives as follows:

- A significantly lower proportion of affordable housing need would be met.
- Accommodating the identified need for specialist housing for older people (which we consider to be a cautious minimum) within overall housing delivery would be more challenging.
- Dwellings growth would not be sufficient to accommodate even the growth scenario based on Oxford Economics forecasts alone, let alone the higher scenario which accounts for the impacts of the NCF. This would result in increased unsustainable commuting and/or suppressed employment growth.
- Government policy is to significantly increase housebuilding and improve affordability, with a target of 1.5 million new homes over the course of this parliament². Local targets under standard method have been set to meet these policy goals, so delivering less makes their achievement less likely.

Therefore, NPPF2024 standard method need should be met.

² [Planning overhaul to reach 1.5 million new homes - GOV.UK](https://www.gov.uk/government/news/planning-overhaul-to-reach-1-5-million-new-homes)



1 Introduction

This report addresses housing need in the Central Lancashire Authorities – Preston, South Ribble, and Chorley – and has been prepared on behalf of Story Homes, Wain Homes, Taylor Wimpey, Persimmon Homes, and Northern Trust by Stantec Development Economics.

1.1 Purpose and approach

The Central Lancashire Authorities are currently consulting on the Publication (Regulation 19) draft of their Local Plan 2023-2041³.

This report assesses housing need across the Central Lancashire Authorities. It will be informed by a critical review of the December 2024 Central Lancashire Housing Study Update produced by DLP Planning, as well as take account of and respond to other relevant evidence and topic papers (e.g. the 2022 Housing Need and Demand Assessments for each district produced by Arc4). It will be informed by further desk research, for example statistics from the ONS and CoStar.

1.2 Structure

The remainder of this report is structured as follows:

- Local Plan Context
- Affordable Housing Need
- Specialist Housing for Older People Need
- Employment-Driven Growth
- Indicative Housing Need Conclusions

³ [Home - Central Lancashire Local Plan](#)



2 Local Plan Context

2.1 The New NPPF

The Publication draft of the Central Lancashire Authorities' Local Plan 2023-2041 is currently being consulted on. Owing to the time of its publication, the plan is proposed to fall under the transitional provisions of the new NPPF, which came into force in December 2024.

Paragraph 234 states⁴:

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:

a. 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; (...)

The rest of the paragraph details other circumstances in which the policies do not apply, however it is 234a which is relevant in this case. The plan reached Regulation 19 stage prior to 12 March 2025, and the proposed housing requirement is 80% (when rounded up) of local housing need as defined by the standard method in NPPF2024, when combining the figures for all three LPAs. This choice of requirement is discussed later in this chapter.

2.2 Central Lancashire Housing Study Update

The Housing Study Update⁵, prepared in December 2024 by the Strategic Planning Research Unit, DLP Planning, forms part of the evidence base for the Local Plan. Crucially, it informs the housing requirement. This section reviews relevant parts of the study.

The study notes, based on Authority Monitoring Reports, that housing delivery across the Central Lancashire Authorities has risen since 2020/2021, with Preston and South Ribble experiencing rising completions, but rates in Chorley declining in recent years. Figures from Table 3 of the study are shown in Figure 2-1, along with the current (December 2024) combined standard method housing need for the Central Lancashire Authorities.

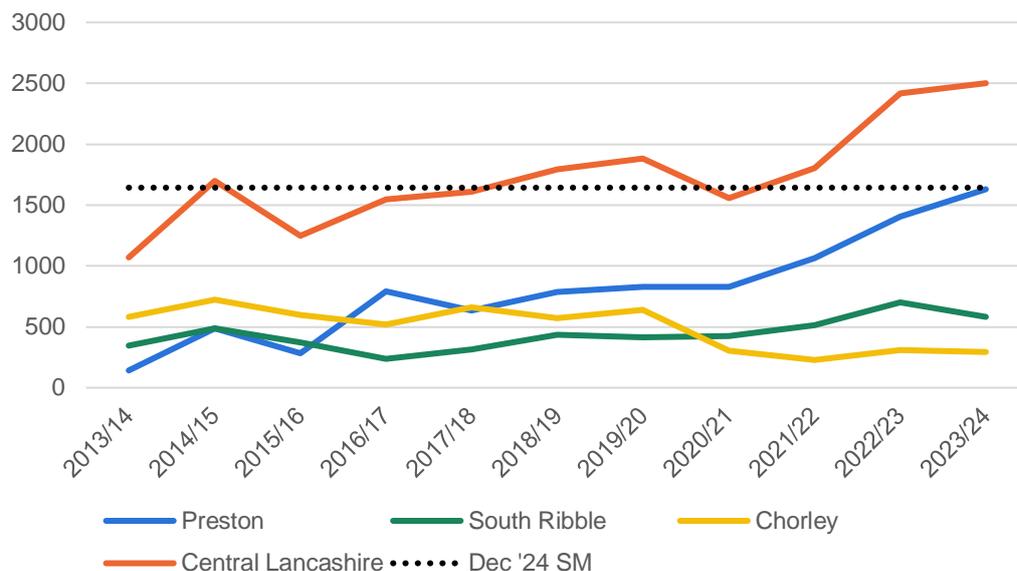
⁴ [National Planning Policy Framework - Annex 1: Implementation - Guidance - GOV.UK](#)

⁵ [ho9-central-lancashire-housing-study-update.pdf](#)



Central Lancashire Housing Need
2 Local Plan Context

Figure 2-1: Dwellings completion rates in Central Lancashire 2013-2024



Source: 2024 Housing Study Update, Stantec Analysis

The NPPF2023 standard method is used as a starting point for housing need. This gave local housing need figures of 269 for Preston, 169 for South Ribble, and 506 for Chorley. This gives a Central Lancashire total of 944, 57% of the figure in the NPPF2024 standard method.

A range of demographic scenarios were developed to determine whether or not alternative approaches would be appropriate.

These include dwelling-led and employment-led scenarios. The latter use Jobs Growth Employment Forecasts from Cambridge Econometrics, which are provided for all three authorities to 2036 and 2041. Relative to the forecasts in a 2022 version of the study, these are somewhat lower for all authorities. Economic activity rates for the scenarios are from the 2021 Census – though the authors note that, given the potential for impacts of Covid-19 to pass, these rates may increase in future. 2011 Census commuting ratios are applied; given the issues with the 2021 Census these were deemed the most robust measure. Alternative figures with a 1:1 commuting ratio, rather than that based on the Census, are also provided.

The 9 scenarios included give dwellings requirements per year ranging from 705 (SNPP-2014: replicating the government’s 2014-based projections) to 1,313 (PG-5yr: using a 2022 base year, with 5-year periods used to inform migration, fertility, and mortality assumptions). Standard method need, under the version in NPPF2023, was 944 dwellings per year.

The option preferred by DLP is the Employment-led CE (CR 2011 1-to-1) projection. In this scenario, population growth is driven by employment growth from Cambridge Econometrics forecasts, and a 1:1 commuting ratio is assumed. This results in a housing need of 1,237 dwellings per annum. DLP note that a 1:1 commuting ratio had not been achieved in recent delivery trends, so a reliance on the NPPF2023 standard method alone had the potential to increase unsustainable patterns of commuting.



2.3 Local Plan Housing Requirement

The draft Local Plan draws on the Housing Study Update in its choice of overall housing delivery requirement. It takes the preferred option from the study, redistributes need between the three authorities to reflect spatial strategy drivers, and then increases the requirement by 77 dwellings per annum.

The purpose of this adjustment to the overall requirement is to increase it to 1,314 dwellings per annum, which is 80% of the standard method requirement in NPPF2024. Under the transitional arrangements discussed previously, this means that the plan would not need to be updated to reflect the revised local need figure in full or the new NPPF. In this sense it is arbitrary rather than a purely evidence-based figure driven by genuine economic factors and has been adjusted to meet a threshold. A later chapter of this report explores whether or not it is indeed sufficient to meet Central Lancashire's employment growth aspirations.

The distribution of housing need under the standard method, the preferred option from the Housing Study Update, and the draft Local Plan is summarised in Table 2-1. The draft Local Plan has a housing requirement below standard method for all three authorities, but the most drastic reduction is for Chorley. Its requirement is 25% of the total, compared to 34% in standard method (or 33% in the Housing Study Update, which produces a very similar distribution to that in standard method). This distribution may pose challenges for the achievement of sufficient housing delivery, particularly affordable and/or specialist, in Chorley.

Table 2-1: Distribution of housing need comparison

	Preston	South Ribble	Chorley	Total
Standard method NPPF2024	590 36%	489 30%	564 34%	1,643
Housing Study Update	441 36%	386 31%	410 33%	1,237
Draft Local Plan	520 40%	460 35%	334 25%	1,314

Source: Housing Study Update 2024, draft Local Plan, Stantec analysis

Table 2-2 complements this distributional analysis, looking at the differences between the draft Local Plan and standard method. Chorley's figure is 41% lower, with the other two authorities seeing much smaller reductions to keep the overall difference to 20%.

Table 2-2: Draft Local Plan housing need figures, % difference vs NPPF 2024

	Preston	South Ribble	Chorley	Total
Standard method NPPF2024	590	489	564	1,643
Draft Local Plan	520	460	334	1,314
% difference vs NPPF2024	-12%	-6%	-41%	-20%

Source: Housing Study Update 2024, draft Local Plan, Stantec analysis



Central Lancashire Housing Need

2 Local Plan Context

The NPPF2024 figure of 1,643 refers to standard method at the time the draft Local Plan was produced, i.e. it is the December 2024 figure. Following the release of 2024 affordability ratios in March 2025, Central Lancashire's figure has slightly increased to 1,662 (reducing the Plan figure % of standard method from 80.0% to 79.1%). It is expected to increase again later in the year following the release of new dwelling stock estimates.



3 Affordable Housing Need

This chapter reviews the HNDA approach to estimating affordable need for the Central Lancashire Authorities and suggests adjustments to them based on the evidence presented and analysis conducted by Stantec.

The percentage of affordable need met under various scenarios for need, overall delivery, and the percentage of delivery which is affordable is then assessed.

3.1 HNDA Approach

The approach taken by Arc4 to calculating affordable housing need is set out in Appendix C of each of the three HNDAs. It is characterised by four steps, which are summarised in turn below. There then follows commentary on the methodology and a summary of the statistics.

3.1.1 Existing households in need

Following PPG 2a-021-20190220, Arc4 sets out components of gross unmet need, namely:

- Homeless households and those in priority need or temporary accommodation from DLUHC (now MHCLG) live tables
- Overcrowded and concealed households from the 2011 Census (the most recent available at the time of the HNDAs being produced) and a 2021 household survey
- Existing affordable tenants and those in other tenures in need from a 2021 household survey

All households which are homeless, in priority need, or temporary accommodation are assumed to be unable to afford to buy or rent. For those in other categories, the affordability of open market options was tested using the household survey, to remove from gross need those able to afford them. In South Ribble, this test was not applied due to a lack of data on incomes.

3.1.2 Future households in need

New household formation is assessed using two different sources:

- Household growth projections for each district (DLUHC 2014-based and ONS 2018-based) from 2021 to 2031
- Average gross household formation rate nationally, from the English Housing Survey (2014-based and 2018-based projections) over the period 2021-2031

For all districts, an average of the national formation rates from English Housing Survey is used to provide a projection for annual household formation.

The household survey analyses the incomes of households which formed in the last 5 years to estimate the proportion of newly-forming households which will not be able to afford lower quartile properties to buy or rent.



Central Lancashire Housing Need

3 Affordable Housing Need

A further component of future need is existing households falling into need. For Preston and Chorley, the household survey identifies households who have fallen into need over the past 5 years, and it is assumed that this annual rate will continue. For South Ribble, the HNDA simply states that *'Households falling into need are assumed to be included in the housing register figures.'*

3.1.3 Affordable supply

Five components of affordable supply are summarised for each authority, namely:

- Affordable dwellings vacated for use by other households in need (Registered Provider lettings data over last 3 years, other evidence from Registered Providers)
- Suitable surplus stock, i.e. vacant affordable dwellings *in excess of 2% of affordable stock* (DLUHC vacant dwelling statistics). For all three authorities, this is 0 as vacancies are below this 'transactional rate'.
- Committed supply of new net affordable homes (Council data), or the average supply of new affordable homes over the last 5 years (DLUHC).
- Estimated supply of affordable home ownership through resales (English Housing Survey).
- Units taken out of management (Local authority data) – none identified for any of the three authorities.

3.1.4 Annual need for affordable housing

This step calculates gross and net annual affordable need based on the above. Current gross unmet need (after affordability test) is annualised – over 10 years for Preston and 5 for the other districts. Newly-arising annual need is added to give gross need. Net need is gross need less annual affordable housing supply.

Arc4 breaks these estimates down by size (based on housing register statistics) and tenure (drawing on the household survey).

3.1.5 Review and summary

Stantec Development Economics considers that the overarching approach taken to estimating net need – that is to say the steps taken, sources used, and the factors influencing need and supply included – is broadly reasonable. We have identified some issues, however, which are discussed below. As the subsequent analysis demonstrates, the impact of addressing these issues is to substantially increase net need above the estimates generated by Arc4.

3.1.5.1 Annualisation of existing households falling into need in Preston

Table C5 of the Preston HNDA (copied below) sums newly-forming households in need and existing households falling into need. The preceding section, 'Existing households expected to fall into need', reads, *'The 2021 household survey identifies 259 households who have fallen into need in the past 5 years and require affordable housing or 52 each year.'* (our emphasis)



Table C5 Total newly-arising affordable housing need

Households	Percentage	Number
A. Number of newly-forming households	-	859
B. Proportion unable to afford market housing	34.1%	293
C. Existing households falling into need	-	259
Total newly arising affordable need (B+C) each year	-	552

Source: 2022 HNDA

Therefore, a 5-year figure has erroneously been used in Table C5 instead of the annual figure. Using 52 instead of 259 would reduce newly-arising affordable need from 552 to 345. Other things being equal, this is a reduction in overall need and implies a shift in the balance of delivery away from Preston to the other two authorities.

3.1.5.2 Omission of existing households falling into need in South Ribble

As mentioned above, existing households falling into need are estimated for Preston and Chorley using the results of the household survey. For South Ribble, these households are assumed to be included in the housing register figures. This difference in approach isn't explained in the HNDA.

We note that in Table C1 of the South Ribble HNDA, the 2022 housing register is given as the source for 'A5 Existing affordable tenants in need' and 'A6 Other tenures in need', whereas for the other two authorities the source is the household survey. Nevertheless, one would only expect a housing register to include *current* need, not *future* need – i.e. households who currently can meet their housing costs but will be unable to do in future.

Had a separate figure for existing households falling into need been included, it would increase need for affordable housing in South Ribble.

3.1.5.3 Partially omitted demand for affordable home ownership

Arc4's methodologies for identifying current and future need both concern households unable to *buy or rent* in the market area. The point at which a household is able to rent and that at which it is able to buy are not the same, as the tests applied are different. As confirmed in paragraph C.8 (in all three HNDAs), the benchmarks used are:

- For buying, up to 3.5x gross household income;
- For renting, up to 25% of gross household income.

PPG quoted by Arc4 includes in its definition of unmet (gross) need for affordable housing:

'the number of households from other tenures in need and those that cannot afford their own homes, either to rent or to own if that is their aspiration' (our emphasis) (PPG 2a-021-20190220)

There is, therefore, an additional source of demand for affordable home ownership – those who:

1. Can afford market rents
2. Aspire to own their own home



3. Cannot afford market ownership

We have not estimated the size of this group, but its non-inclusion in this methodology means that the HNDA estimates are too cautious.

3.1.5.4 Higher estimate of affordable dwellings vacated in Chorley

The main component of Table C6 (Affordable housing supply) in all three HNDAs is the number of affordable dwellings expected to be vacated by occupiers that are fit for use by other households in need. For Preston and South Ribble these figures (622 and 372 respectively) are simply an annual average of general needs affordable dwellings let from 2017/18 to 2019/20, using data from Registered Providers.

For Chorley, Table C6 says:

'Annual average of 579 general needs affordable dwellings have been let 2017/18 to 2019/20.

Evidence from local RP lettings data indicates a much higher level of turnover of 1,155 each year.' (our emphasis)

No further detail is given on this evidence, nor any reason as to why it is used for Chorley only. Whilst projecting forward a recent average is clearly a reasonable approach, this alternative figure represents a doubling of the 2017/18-2019/20 average that would otherwise be used. Using the simple annual average instead would reduce total annual supply for Chorley from 1,277 to 701, with significant consequences for the overall need position.

3.1.5.5 Non-inclusion of affordable housing stock losses

As a result of Right to Buy / Right to Acquire, plus demolitions, there is significant potential for the stock of affordable housing to fall. This should be reflected as a deduction from supply but is not in the Arc4 analysis – though it does note below Table C6 in each HNDA:

'stock losses through right to buy are not referenced in PPG and not included in this table. Any losses through right to buy would increase the shortfall.'

Whilst PPG does not specifically reference Right to Buy, it does say that *'units to be taken out of management'* should be deducted from supply⁶. Units sold by local authorities or Registered Providers cease to be under management.

In Stantec's experience, affordable housing losses can be equivalent to a significant proportion of need, so disregarding them can result in underestimating net need. This is explored further in Stantec's analysis of affordable housing stock and delivery.

⁶ PPG Paragraph: 022 Reference ID: 2a-022-20190220



3.1.5.6 Summary figures

Table C7 in each HNDA summarises the need and supply situation. These are combined for the purposes of comparison in Table 3-1. On the HNDA figures

Table 3-1: Gross and net affordable need summary, Central Lancashire Authorities, HNDA figures

	Preston	South Ribble	Chorley	Total
Current unmet gross need	11,477	1,937	5,511	18,925
After affordability test	6,747	1,937	4,755	13,439
Annualised need	675	387	951	2,013
Newly-arising affordable need	552	406	439	1,397
Total gross need	1,227	793	1,390	3,410
Total supply	831	471	1,277	2,579
Total net need	395	323	113	831

Source: 2022 HNDAs, Stantec analysis

3.2 Stantec Analysis

In this section, we build on the findings of the HNDA with:

- Analysis of government data on affordable housing stock lost (i.e. to Right to Buy/Acquire or to demolitions)
- Analysis of historic rates of affordable housing delivery
- Adjustments to affordable need figures from the HNDAs following our review of the methodology
- Implications of the level of housing delivery overall on how much of the affordable need is met

3.2.1 Affordable housing stock losses and delivery analysis

To calculate the rate of affordable housing loss Stantec Development Economics has completed the following process:

- The tenure of those living in each local authority (Preston, Chorley and South Ribble) is taken from the 2011 and 2021 Censuses.



Central Lancashire Housing Need

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- The proportions of residents living in houses of each tenure from the 2011 and 2021 Census data are applied to the total number of dwellings for both 2011 and 2021 respectively, from the Ministry of Housing, Communities and Local Government (MHCLG)⁷.
- The number of vacant homes of both private and social tenures are stripped from these figures using further data from MHCLG⁸. From this we are left with figures for non-vacant homes of each tenure for 2011 and 2021.
- Data for the intermediate years is interpolated, resulting in estimates of the number and proportion of all non-vacant homes within the local authority of each tenure from 2011 to 2021.
- The proportion of all private homes which are owner occupier, rented and shared ownership is estimated, as well of the proportion of affordable homes which are affordable rented and 'lives rent free'.

The next component of the analysis looked at gross additions to the housing stock in each local authority. The goal of this is to estimate the total number of affordable additions as well as the affordable additions as a proportion of total additions annually and over the period 2012 – 13 to 2022 – 23. We take further data from MHCLG⁹ on new builds, net conversions, net change of use, other gains and losses and demolitions as well as MHCLG data¹⁰ on affordable additions to the housing stock by year.

The data on housing for each local authority calculated in the first portion of our analysis is combined with data from Live Table 100 and aggregated into affordable and private stock that each local authority has, annually from 2011 to 2022. The reason why both data sources have been combined is that shared ownership is included within the stock of private homes within Live Table 100, while we consider shared ownership as an affordable tenure. We have therefore subtracted it from the private stock and added to the affordable stock. Shared ownership additions for each local authority are obtained from Live Table 1011C for 2022 as no census data is available for this year.

Through this process we can calculate the net year on year change in affordable stock from 2011 to 2022. We obtain gross additions of affordable stock from Live Table 1011C and sum both over the 10-year period. We divide the 10-year net change in affordable stock by the 10-year sum of gross affordable additions to obtain net additions per gross. This gives us losses of affordable stock as a percentage of additions in a particular local authority, as well as the average number of affordable units lost each year.

⁷ MHCLG Live Table 100

⁸ MHCLG Live Table 615

⁹ MHCLG Live Table 123

¹⁰ MHCLG Live Table 1011C



3.2.2 Adjustments to net annual affordable need calculations

In light of our review of the HNDA methodology, we consider that some adjustments should be made to more fully capture the extent of affordable need. Table 3-2 more fully breaks down the HNDA figures, with table references identified for each row and a totals column added.

Where figures have been adjusted subsequent to our review and analysis, these are indicated in white on an orange background. Subsequent calculations affected by these changes are on a pale orange background. The changes made are as follows:

- **Existing households falling into need, Preston**
Adjusted from **259** to **52**. This corrects the 5-year figure incorrectly included in the HNDA to the annual figure given by Arc4, reducing newly-arising need.
- **Existing households falling into need, South Ribble**
Adjusted from **0** to **99**. These households were assumed to be included in the housing register figures by Arc4, but we do not consider this to be case. To produce a central estimate, we have looked at existing households falling into need as a percentage of all households for the other two districts, taken an average, and applied this to South Ribble¹¹.
- **Affordable dwellings vacated, Chorley**
Adjusted from **1,115** to **579**. The higher figure is justified on the basis of local Registered Providers' letting data, but this is not provided or explained in any further detail. Therefore, the recent average, in line with the other two districts, has been used instead.
- **Affordable stock losses**
Subsequent to Stantec's analysis, a new row for affordable stock losses has been added. These losses reflect a deduction from total supply.

¹¹ Total households by district used by Arc4 were derived from figures in Table C1 of the HNDAs for all households in need and households in need as a % of all households. Existing households falling into need as a proportion of all households was 0.09% in Preston (52/58,556) and 0.32% in Chorley (166/51,991). Therefore, the average of these, 0.20%, was used for South Ribble. With 48,425 households in the district, this amounted to 99.



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Table 3-2: Gross and net affordable need breakdown, Central Lancashire Authorities, HNDA figures with Stantec adjustments

	HNDA table	Preston	South Ribble	Chorley	Total
<i>Current unmet gross need (total)</i>					
A1 Homeless	C1	569	186	54	809
A2 Priority need/temp. accomm.	C1	662	386	780	1,828
A3 Overcrowded	C1	1,423	921	388	2,732
A4 Concealed	C1	1,668	444	1,294	3,406
A5 Existing affordable in need	C1	2,317	527	610	3,454
A6 Other tenures in need	C1	5,288	748	2,691	8,727
A7 = sum A3 to A6	C1	10,696	2,640	4,983	18,319
A8 = A7 minus double counting	C1	10,246	1,365	4,677	16,288
A9 = A1 + A2 + A8 (All in need)	C1	11,477	1,937	5,511	18,925
<i>As % of all households</i>	C1	19.6%	4.0%	10.6%	11.9%
<i>% of A8 unable to afford</i>	C3	53.4%	100.0%	56.8%	58.3%
No. of A8 unable to afford	C3	5,476	1,365	2,658	9,499
Total unable to afford	C3	6,747	1,937	4,755	13,439
<i>Future households in need (annual)</i>					
Gross household formation	C5	859	707	775	2,341
<i>% unable to afford</i>	C5	34.1%	57.4%	35.2%	41.5%
Newly-forming unable to afford	C5	293	406	273	972
Existing falling into need	C5	52	99	166	317
Newly-arising affordable need	C5	345	505	439	1,289
<i>Affordable housing supply (annual)</i>					
Affordable dwellings vacated	C6	622	372	579	1,573
Surplus stock	C6	0	0	0	0
Committed net new supply	C6	183	86	110	379
Affordable ownership resales	C6	26	13	12	51
Taken out of management	C6	0	0	0	0
Affordable stock losses	N/A	37	16	12	65
Total supply	C6	794	455	689	1,938
<i>Total annual need</i>					
Current unmet gross need	C7	11,477	1,937	5,511	18,925
After affordability test	C7	6,747	1,937	4,755	13,439
Annualised need	C7	675	387	951	2,013
Newly-arising affordable need	C7	345	505	439	1,289
Total gross need	C7	1,020	892	1,390	3,302
Total supply	C7	794	455	689	1,938
Total net need	C7	226	437	701	1,364
<i>Difference vs. unadjusted</i>		-169	114	588	533

Source: 2022 HNDAs, Stantec analysis



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The impact of these adjustments is therefore to increase net need for affordable housing from 831 to 1,364 dwellings per annum across Central Lancashire. Need generated by South Ribble and Chorley increases, and that from Preston decreases. This shifts the overall share of need sharply from Preston to Chorley, as shown in Table 3-3. In the unadjusted estimates, nearly half of net need arises from Preston; in the adjusted estimates, over half is from Chorley. Across Central Lancashire, net need increases by 533 per annum.

Table 3-3: Adjusted and unadjusted net affordable need, share of total by authority

	Preston	South Ribble	Chorley
Unadjusted net need	395	323	113
% of total	47.5%	38.9%	13.6%
Adjusted net need	226	437	701
% of total	16.6%	32.0%	51.4%
Difference	-169	114	588
	-31.0%	-6.8%	37.8%

Source: 2022 HNDA, Stantec analysis

One significant component of our review of the HNDA methodology has not been reflected here, namely the partially omitted demand for affordable home ownership. This would increase gross and therefore net need across all three authorities, so we consider these estimates to still be cautious.



3.2.3 Implications for overall housing delivery

Implications of overall housing delivery for affordable housing delivery are now reviewed. This analysis is summed up in Table 3-4. For each authority individually, and the three combined, we show the proportion of affordable need achieved for eight different scenarios, which vary the following:

- **Affordable net need:** use of Arc4's estimates unadjusted, or Stantec's adjusted versions.
- **Level of overall housing delivery:** the target distribution of housing requirements by district from Policy HS1 of the Local Plan¹², or standard method figures as updated in December 2024.
- **Affordable housing delivery %:** the historic rate achieved, as shown in our analysis, or the target rate from the Local Plan. Policy HS7 confirms that for sites of 10 dwellings or 0.5ha and above, the affordability target is 30% in Tiers 1, 2 and 3 of the settlement hierarchy and 35% in other locations (i.e. Tiers 4 and 5). Policy SS2: Settlement Hierarchy confirms that Tiers 4 and 5 are 'Rural Local Service Centres' and 'Smaller Rural Villages and Hamlets' respectively. Both will accommodate limited new development, so we assume the 30% rate overall¹³.

Focusing on the results for affordable need met in Central Lancashire overall, we see that:

- Using Stantec's **adjusted** estimates, it's **between 26.7% and 36.1%** – so in the worst case, a little over a quarter of need is addressed.
- If Arc4's **unadjusted** estimates are maintained, the picture improves significantly, to **between 43.8% and 59.3%**; though this means that at best, under two-thirds of need is addressed.
- Meeting **standard method** need as per NPPF2024 rather than the Local Plan figure leads – unsurprisingly – to higher proportions of need being met in all cases. For the unadjusted need estimates, and assuming that target delivery rate is achieved, this difference is **11.9% of total need (59.3% compared to 47.4%)**.
- Whether **historic or target** delivery rates are achieved has a significant bearing. At most – using unadjusted estimates and standard method delivery – the difference is **6.3% of total need (59.3% compared to 53.1%)**.

There are similar patterns for South Ribble and Chorley. In Preston, however, Stantec's adjustments lower affordable net need rather than increase it, and historic affordable delivery is higher than the Local Plan target, not lower than it – so the results look rather different.

¹² Policy HS1 is on page 52.

¹³ Policy HS7 is on page 70. Policy SS2 is on page 25.



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Table 3-4: Affordable net need achieved by authority, for adjusted and unadjusted estimates, overall delivery, affordable delivery achieved

Affordable net need estimates		Overall delivery		Affordable % achieved		Delivered	
						No.	%
Preston							
Unadjusted	395	Reg 19 Plan	520	Historic	44.2%	230	58.2%
				Target	30.0%	156	39.5%
		NPPF 2024	590	Historic	44.2%	261	66.0%
				Target	30.0%	177	44.8%
Adjusted	226	Reg 19 Plan	520	Historic	44.2%	230	101.7%
				Target	30.0%	156	69.0%
		NPPF 2024	590	Historic	44.2%	261	115.4%
				Target	30.0%	177	78.3%
South Ribble							
Unadjusted	323	Reg 19 Plan	460	Historic	16.0%	74	22.8%
				Target	30.0%	138	42.7%
		NPPF 2024	489	Historic	16.0%	78	24.2%
				Target	30.0%	147	45.4%
Adjusted	437	Reg 19 Plan	460	Historic	16.0%	74	16.8%
				Target	30.0%	138	31.6%
		NPPF 2024	489	Historic	16.0%	78	17.9%
				Target	30.0%	147	33.6%
Chorley							
Unadjusted	113	Reg 19 Plan	334	Historic	18.1%	60	53.5%
				Target	30.0%	100	88.7%
		NPPF 2024	564	Historic	18.1%	102	90.3%
				Target	30.0%	169	149.7%
Adjusted	701	Reg 19 Plan	334	Historic	18.1%	60	8.6%
				Target	30.0%	100	14.3%
		NPPF 2024	564	Historic	18.1%	102	14.6%
				Target	30.0%	169	24.1%
Central Lancashire							
Unadjusted	831	Reg 19 Plan	1,314	Historic	24.9%	364	43.8%
				Target	30.0%	394	47.4%
		NPPF 2024	1,643	Historic	24.9%	441	53.1%
				Target	30.0%	493	59.3%
Adjusted	1,364	Reg 19 Plan	1,314	Historic	24.9%	364	26.7%
				Target	30.0%	394	28.9%
		NPPF 2024	1,643	Historic	24.9%	441	32.3%
				Target	30.0%	493	36.1%

Source: 2022 HNDAs, Stantec analysis



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Table 3-5 explores the relationships between affordable and overall need by authority, calculating the former as a percentage of the latter according to:

- Overall need figures from current standard method (**NPPF 2024**), the preferred option from the Housing Study Update (**HSU 2024**), or the draft Local Plan (**Reg 19 Plan**).
- **Unadjusted** or **adjusted** figures for affordable need, as calculated above.

These figures show the proportion of overall delivery that would need to be affordable in order to exactly meet the relevant affordable net need each year. For example, for Preston the unadjusted figure for affordable net need from the HNDA is 395. Standard method (NPPF 2024) gives an overall housing need figure of 590. Therefore 67% (395/590) of overall delivery would need to be affordable for need to be met – i.e. it is theoretically possible but unlikely to be achievable in practice.

The most interesting results relate to Chorley:

- The unadjusted affordable need figure (113) is well within all overall need figures – as low as 20% for NPPF 2024.
- The adjusted affordable need figure (701) is, however, above all the overall need figures. Even in the exceedingly unlikely event that all housing in Chorley were delivered as affordable units, net need would not be met.
- The Reg 19 Plan has Chorley taking significantly less housing in both absolute and relative terms. Therefore, while adjusted net affordable need is 124% of standard method (NPPF 2024) overall need, it rises to 210% of the figure in the draft plan.

The spatial distribution in the draft Local Plan therefore makes it likely that very little of Chorley's affordable need will be delivered.

Table 3-5: Affordable net need as a percentage of overall need

Overall need		Affordable net need	
		Unadjusted (HNDAs)	Adjusted (Stantec)
Preston		395	226
NPPF 2024	590	67%	38%
HSU 2024	441	90%	51%
Reg 19 Plan	520	76%	43%
South Ribble		323	437
NPPF 2024	489	66%	89%
HSU 2024	386	84%	113%
Reg 19 Plan	460	70%	95%
Chorley		113	701
NPPF 2024	564	20%	124%
HSU 2024	410	28%	171%
Reg 19 Plan	334	34%	210%

Source: 2022 HNDAs, Stantec analysis



4 Specialist Housing for Older People Need

This chapter reviews the HNDA approach to estimating need for specialist housing for older people in the Central Lancashire Authorities and contrasts them with alternatives estimated by Stantec.

4.1 HNDA Approach

The approach taken by Arc4 in the HNDA for all three local authorities that comprise Central Lancashire is the same, as set out in Chapter 4 of each document (with additional details in Appendix D). It is characterised by 4 steps. These steps are detailed below and can be summarised as:

1. establishing the current and future (2038) older population
2. establishing the existing stock of specialist accommodation
3. calculating the current ratio of C3 and C2 housing per resident aged 75+ within each area
4. using the ratio calculated in (3) to estimate future housing need in 2038.

Stantec Development Economics commentary on HNDA statistics and methodology is set out thereafter. The definitions of C3 accommodation are slightly different than those used by Stantec Development Economics as the HNDAs class Extra Care Housing as C3 while Stantec recognises this housing type as C2. Nonetheless Stantec Development Economics includes extra care housing within its analysis, therefore the two sets of analyses are comparable with one another with respect to what is in scope.

4.1.1 Current and Future Older Population

All three HNDAs have used the 75 and over age cohort as a measure of the older population in each authority. Arc4 utilises ONS 2018-based population projections to establish the number of residents aged 75+ in each area in 2021 (current) and then in 2038.

4.1.2 Existing Stock

Data on the existing stock of specialist housing is obtained from the Elderly Accommodation Council (EAC) for 2021. The specialist housing stock is then divided into C2 and C3 use classes, and from there by type. C3 specialist housing is split into Age-Exclusive Housing, Sheltered, Retirement Housing, Enhanced Sheltered and Extra Care Housing. Descriptions of each of these housing types are provided in Table 4.3 of each HNDA. C2 specialist housing is divided into Care Homes and Care Homes with Nursing.

4.1.3 Future Need

To calculate future need, the total number of C3 units in each of the three local authorities in 2021 is divided by the number of residents in that area aged 75+ to obtain the current ratio of specialist housing units to older persons. This ratio is applied to the number of residents aged 75+ projected in 2038 for each area. The resulting number of C3 units is the future need figure for 2038. The same process is followed for C2 accommodation.



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Table 4-1, Table 4-2, and Table 4-3 display the C3 specialist housing need figures within the HNDAs for Preston, Chorley and South Ribble. Table 4-4 totals figures across Central Lancashire (and calculates the resulting overall ratio of dwellings to residents). This gives a net need figure of 1,961.

Table 4-1: Preston 2022 HNDA C3 Housing Need

Preston	75+ resident population 2021	75+ resident population 2038
	9,582	12,913
Number of C3 units 2021	Ratio C3 units per resident aged 75+	2021 C3 Ratio applied to 75+ population 2038
3,078	0.321	4,148
Net need 2021 - 2038	1,070	

Source: Preston 2022 HNDA Table 4.4

Table 4-2: South Ribble 2022 HNDA C3 Housing Need

South Ribble	75+ resident population 2021	75+ resident population 2038
	24,415	31,503
Number of C3 units 2021	Ratio C3 units per resident aged 75+	2021 C3 Ratio applied to 75+ population 2038
1,508	0.062	1,946
Net need 2021 - 2038	438	

Source: South Ribble 2022 HNDA Table 4.4

Table 4-3: Chorley 2022 HNDA C3 Housing Need

Chorley	75+ resident population 2021	75+ resident population 2038
	10,916	16,747
Number of C3 units 2021	Ratio C3 units per resident aged 75+	2021 C3 Ratio applied to 75+ population 2038
848	0.078	1,301
Net need 2021 - 2038	453	

Source: Chorley 2022 HNDA Table 4.4

Table 4-4: Central Lancashire 2022 HNDA C3 Housing Need

Central Lancashire	75+ resident population 2021	75+ resident population 2038
	44,913	61,163
Number of C3 units 2021	Ratio C3 units per resident aged 75+	2021 C3 Ratio applied to 75+ population 2038
5,434	0.121	7,395
Net need 2021 - 2038	1,961	

Source: 2022 HNDAs, Stantec analysis



4.1.4 Review and Summary of HNDA

Stantec Development Economics has three concerns with the HNDA methodology, detailed below.

4.1.4.1 No Evidence-based Requirements

The HNDA methodology takes the current rate of provision and applies this to the population in 2038, effectively assuming that the current rate of provision is correct and ensuring that it is maintained. It does not investigate whether specialist housing is under- or over-provided in these areas. Furthermore, it does not utilise requirements derived from evidenced online toolkits designed to inform housing need assessments of the appropriate level and type of specialist housing for a population.

Planning Practice Guidance (PPG) states that:

*The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and **can be obtained from a number of online tool kits provided by the sector**, for example the Strategic Housing for Older People Analysis Tool (SHOP@), which is a tool for forecasting the housing and care needs of older people.*
(PPG Reference ID: 63-004-20190626; our emphasis)

Therefore, if specialist housing is under- or over-provided in any area, this imbalance will be carried forward into the future, resulting in an inappropriate use of housing land that does not best serve the local population.

4.1.4.2 Population Data

While the population figures within the HNDAs for both Preston and Chorley align with the ONS 2018-based population projections, those for South Ribble are far larger. Table 4.4 of the South Ribble HNDA states the 2021 75+ population as 24,415 while ONS population projections present a figure of 11,204. Similarly, the South Ribble HNDA estimates that the 75+ population will reach 31,503 by 2038, while ONS population projections show a figure of 15,926.

The HNDA 75+ population figures are very similar to those of the 65+ population presented within the ONS 2018-based population projections, 24,417 in 2021 and 31,501 in 2038. It appears that the 65+ figures have been used by mistake in South Ribble.

The number of C3 specialist housing units in South Ribble in 2021, presented in the HNDA and obtained from the EAC data base, is 1,508. Using the HNDA figure for population in 2021 of 24,415 gives a rate of 62 C3 units per 1,000 residents aged 75+. Applied to the HNDA 2038 75+ population estimate, this gives a gross figure of need for C3 units of 1,946, and net need of 438.

When using the HNDA methodology on ONS population projection figures for the South Ribble 75+ population, however, the 1,508 C3 units gives a rate of 135 units per 1,000 75+ residents. Carrying this rate forwards on to the 2038 75+ population of 15,926 gives a gross need figure of 2,144 and a net need figure of 636. Therefore, this mistake has led the HNDA specialist housing net need figure for South Ribble to be 198 units (31%) lower than it should be, using the HNDA methodology. This is because as the population ages the number aged 75+ grows more quickly than that aged 65+.



4.1.4.3 No Housing Type or Tenure Breakdown

As mentioned in 4.1.2 'Existing Stock', C3 specialist housing for older people is split into different types, as older people require differing levels of care, community and independence. While the HNDA identifies the current stock of these different types, it does not provide a breakdown of C3 housing need into these types, i.e. between those which do and do not include care services, or by tenure. This leaves ambiguity over which types of C3 housing will be provided in each area, and whether each type will be provided such that the needs of the local older population are met.

4.2 Stantec Analysis

In this section we provide Stantec Development Economics' methodology for determining specialist housing need and apply this to all three Central Lancashire Authorities.

National health and social care policy, enacted locally, promotes independent living to enable living well in old age. This has filtered into national planning policy, which calls for a mix of housing, including housing for older people, for which the Government's planning practice guidance states there is a critical need¹⁴. The methodology used in Stantec's analysis and assessment is derived from the 'Housing in Later Life' report, published in 2012¹⁵. 'Housing in Later Life' provides a toolkit for local authorities in England when planning for specialist housing for older people.

4.2.1 Housing in Later Life

The Housing in Later Life approach involves an examination of local factors, including the size and makeup of the local older population and how it is projected to change, prevalence of ill health and support needs, the existing supply of specialist housing for older people, and the tenure of older households. The approach culminates in a set of requirements for specialist housing by type and tenure, for the older population of an area.

Following the approach set out in 'Housing in Later Life' and applying the recommended specialist housing provision rates¹⁶, is consistent with achieving outcomes pursued by national planning policy¹⁷ and guidance¹⁸ – to boost the supply of specialist housing for older people; planning practice guidance describes this need as *critical*.¹⁹ It is for this reason that the specialist housing (market Extra Care) provision rates recommended by 'Housing in Later Life' have been endorsed at appeal and at local plan examination, albeit with the caveat that they should be far more ambitious.

¹⁴ PPG ID 63-001-20190626.

¹⁵ Housing in later life; planning ahead for specialist housing for older people: National Housing Federation, Housing LIN, McCarthy & Stone, Contact Consulting, Tetlow King Planning (December 2012), pages 1 to 3.

¹⁶ The recommend provision rates are expressed as units of accommodation per thousand of the population age 75 and over.

¹⁷ 3 NPPF 2021, paragraph 62.

¹⁸ PPG, ID 63, Housing for Older and Disabled People.

¹⁹ PPG, ID 63, Housing for Older and Disabled People.



4.2.2 Housing in Later Life Target Provision Rates

The Housing in Later Life target provision rates for each specialist housing type are set out below (Table 4-5), alongside the aggregated position for 'Retirement Housing' ('Age Exclusive' and 'Sheltered Housing') and 'Housing with Care' ('Enhanced Sheltered' and 'Extra Care').

Table 4-5: Target Specialist Housing Rates per Thousand Aged 75 and Over

	For sale	For rent		For sale	For rent
Age Exclusive	120	60	'Retirement Housing'	120	60
Sheltered					
Enhanced sheltered	10	10	'Housing with Care'	40	25
Extra Care	30	15			
ALL TYPES	160	85	ALL TYPES	160	85

Source: Housing in Later Life, Planning Ahead for Specialist Housing for Older People, December 2012

The extent to which the provision rates recommended by 'Housing in Later Life' address critical need at the local level, or whether, in fact, they should be more ambitious is best understood by reference to local factors, such as the scale of the older population indicators of need, tenure preference, household composition and the housing stock profile.

4.2.3 Local Drivers of Need

This section aims to provide a picture of local need for and supply of specialist housing for older people across Central Lancashire. To that end, we address the following:

- i. The scale of and projected change in the older population
- ii. Older households and their living arrangements (state pension age and above)
- iii. The balance between the demand for and supply of specialist housing for older people in Preston, South Ribble, and Chorley.

4.2.4 The scale and projected change of the older population

To make our analysis comparable to that of the HNDA, we have estimated the population of all three areas in 2021 and 2038. For 2021 figures we use data directly from the Mid-Year Population Estimates (MYPE), produced by the ONS²⁰. For 2038 population estimates, we take the percentage growth of the 75+ population (males and females separately) between 2021 and 2038 from the ONS 2018-based population estimates and apply this to the 2023 MYPE figures for 2021. This gives a more up to date

²⁰ 2013 Mid-Year Population Estimates, downloaded from NOMIS on 11/03/2025



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estimate than the population projections as the MYPE figures were recorded in 2023 and reflect demographic changes that may have occurred between 2018 and 2023.

Figure 4-1 shows the estimated size of the 75+ populations of the Central Lancashire Authorities.

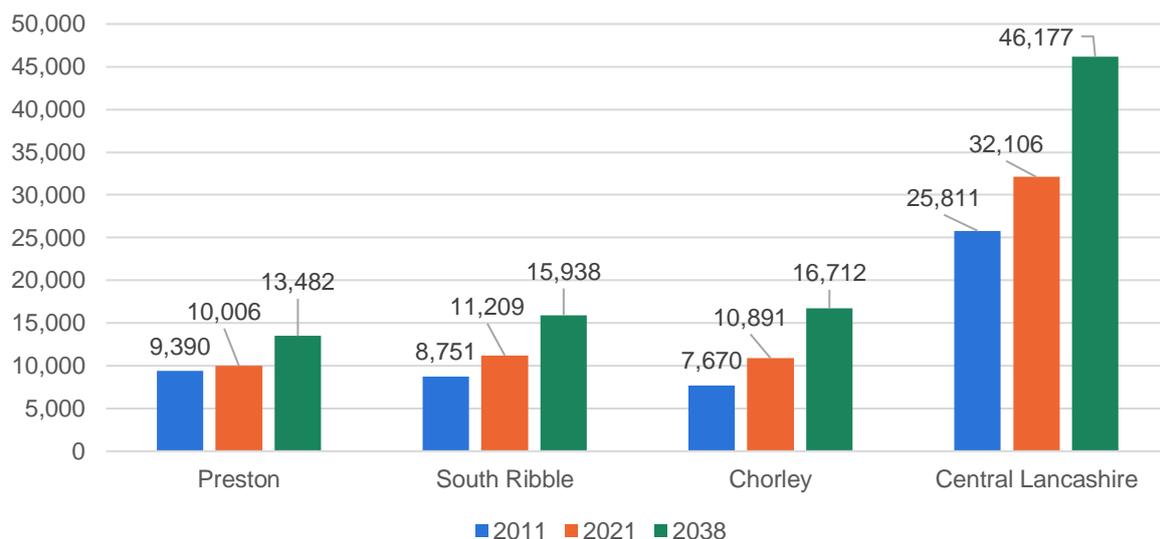
In Preston, the 75+ population grew by 6.6% from 2011 to 2021 reaching 10,006. It is expected to grow by a further 3,476 (34.7%) by 2038, reaching 13,482.

For South Ribble, the 2021 75+ population is estimated to be 11,209, increasing by 4,729 (42%) to 15,938 by 2038.

In Chorley, the 75+ population is estimated at 10,891 in 2021 and projected to grow by 5,821 by 2038 (53.4%) reaching 16,712.

Combined, these figures give estimates for the older population of Central Lancashire. The 2021 75+ population is estimated at 32,106 in 2021 and projected to increase by 14,071 (43.8%) to reach 46,177 in 2038.

Figure 4-1: 75+ population in Preston, South Ribble, Chorley, Central Lancashire, 2011, 2021, 2038



Source: MYPE, Population Projections, Stantec Analysis

Table 4-6 shows the number of 75+ residents of all three authorities who live in communal establishments and households in 2021. Communal establishments refer principally to care homes and nursing homes.



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Table 4-6: 75+ Population in Communal Establishments 2021

	Preston	South Ribble	Chorley	Central Lancashire
Communal Establishments	756	445	695	1,897
Household Residents	9,250	10,764	10,196	30,209
% of all residents in Communal Establishments	7.6%	4.0%	6.4%	5.9%

Source: 2021 Census, 2023 MYPE, ONS Population Projections, Stantec Analysis

4.2.5 Older households and their living arrangements

18% of all homes in Preston are occupied exclusively by those of retirement age (66 and over). This figure is 16% for South Ribble, 24% for Chorley, and 18% across Central Lancashire. In comparison, 2.4% of homes in Preston, 1.4% in South Ribble, 2.1% in Chorley, and 1.8% of homes across Central Lancashire are specialist accommodation for older people.

Table 4-7 displays the number of retirement age residents of the three authorities estimated to live in communal establishments and households in 2021 and 2038. It also shows, of those who live in households, the number who live in households comprised exclusively of those aged 66+.

Table 4-7: Residence of 66+ Population, 2021, 2038

		Communal Establishments	66+ in Households	66+ in Households comprised only of 66+
Preston	2021	910	19,700	14,730 (75%)
	2038	1,170	25,520	19,060 (75%)
South Ribble	2021	480	22,390	17,870 (80%)
	2038	620	29,220	23,300 (80%)
Chorley	2021	890	22,070	17,600 (80%)
	2038	1,250	30,960	24,700 (80%)
Central Lancashire	2021	2,250	64,250	50,250 (78%)
	2038	3,100	88,000	67,050 (78%)

Source: 2021 Census, 2023 MYPE, ONS Population Projections, Stantec Analysis. Figures have been rounded and therefore may not add to the total.



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In Preston, 75% of retirement aged household residents live in households comprised only of those aged 66 and over in both 2021 and 2038. In both Chorley and South Ribble this figure is 80%. Across Central Lancashire 78% of 66+ residents living in households, reside in households comprised exclusively of 66+ residents.

Table 4-8 shows how the population of 'State Pension Age only' households breaks down by those living alone and living in couples, overall and by tenure. It also shows those defined as disabled, based on Census 2021 data.

Table 4-8: 'State Pension Age only' households, by population and tenure, Central Lancashire, 2021²¹

	Owners		Social Renters		Private Renters		Total
Single family household, one or more disabled	6,642	88%	599	8%	274	4%	7,516
Single family household population, disabled	9,409	88%	948	9%	389	4%	10,746
Single family household, no one disabled	8,231	95%	255	3%	215	2%	8,700
Single family population, not disabled	22,050	94%	836	4%	635	3%	23,522
Total single-family households	14,874	92%	854	5%	489	3%	16,217
Total single family (couples) population	31,459	92%	1,785	5%	1,024	3%	34,268
One person household, disabled	4,039	67%	1,549	26%	459	8%	6,047
One person household, not disabled	7,090	78%	1,354	15%	596	7%	9,040
Total one-person households	11,129	74%	2,903	19%	1,055	7%	15,087
Total households	26,002	83%	3,757	12%	1,544	5%	31,304
<i>With one or more disabled residents</i>	10,681	41%	2,149	57%	733	47%	13,563
Total household population	42,688	85%	5,085	10%	2,475	5%	50,248
<i>Of which disabled</i>	13,180	31%	2,626	52%	932	38%	16,739
<i>Average household size</i>	1.64		1.35		1.60		1.61
Total households (66+ only) as a % of all households	70%		75%		25%		64%

Source: ONS, Census 2021, Mid-Year Population Estimates 2022 and Stantec analysis

²¹ All rows sum to 100% with the exception of rows referring to disabled residents as these are calculated as a percentage of population or households by tenure from the rows above.



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The 2021 Census categorises people who assessed their day-to-day activities as limited by long-term physical or mental health conditions or illnesses as disabled. This definition of a disabled person meets the harmonised standard for measuring disability and is in line with the Equality Act (2010). Census 2021 rates are applied to recent population figures in order to produce up-to-date estimates.

Increasing the supply of specialist housing for older people, which is designed to overcome the barriers to 'independently living well' that many of Central Lancaster's 'State Pension Age and over' will currently face, should reflect tenure preference, if it is to be an attractive potential move for older people.

We estimate that approximately 15,980 retirement aged residents of Central Lancashire live alone in 2021, comprising 32% of the 66+ population. The significance of the number of older people living alone is at least three-fold:

- Although many older people who live alone will remain well-connected and integrated with family, friends and their community a significant proportion²² will not.
- The UK Government has compiled a cross-sectional evidence base to support the association between loneliness and a range of psychiatric disorders, including anxiety, depression²³.
- The number of those living alone will also, in the majority of cases, contribute to the inefficient use of the current stock of general housing through under-occupation.

On the reasonable assumption that the prevalence of living alone and the tenure balance recorded by the 2021 Census persists, and projected (ONS) population growth is realised, we can predict the number of older residents living alone and as part of households, by tenure in 2038. We estimate that the number of households in Central Lancashire comprised only of those aged 66+ will increase by 12,050 by 2038 to 43,350. Of them, those of owner occupier tenure are estimated at 35,970, while those who socially rent number 5,240 and 2,150 who rent privately.

4.2.6 Housing in Later Life Requirements

This section of the report applies the Housing in Later Life target rates of specialist housing per 1,000 residents aged 75+, presented in Table 4-5, to the 75+ populations of Preston, Chorley, South Ribble and Central Lancashire in 2021 and 2038. This provides gross and net specialist housing need figures than can be directly compared to those produced by Arc4 and presented in the HNDAs.

Table 4-9 shows the 2021 (current) and 2038 (future) requirement for specialist housing in Preston, in accordance with the Housing in Later Life prevalence rates. Current provision has been sourced from the EAC database (2025 Q1). For 2021 supply, all units built after 2021 were excluded while for 2038 supply all units with planning permission to date have been included.

²² All the Lonely People: Loneliness in Later Life, Age UK 2018

²³ <https://www.gov.uk/government/publications/tackling-loneliness-evidence-review/tackling-loneliness-evidence-review-full-report#mental-health-and-loneliness>



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This shows that in Preston, there is a current gross need for 2,451 units of specialist housing in 2021 which increases to 3,303 in 2038 given the projected increase in the 75+ population. For net need, these figures are 1,456 for 2021 and 2,014 for 2038²⁴.

Table 4-9: Current and Future Requirements for Specialist Housing for Older People in Preston

2021					
Specialist Housing Type and Tenure	Current provision (number of units)	Current units per 1,000 residents aged 75+	Target units per 1,000 residents aged 75+	Required Increase or decrease	Resulting number of units
		per 1,000 residents aged 75+			
Rental 'Retirement Housing'	1,046	105	60	-446	600
Owner Occ. 'Retirement Housing'	323	32	120	878	1,201
Rental 'Housing with Care'	72	7	25	178	250
Owner Occ. 'Housing with Care'	0	0	40	400	400
2038					
Rental 'Retirement Housing'	1,046	78	60	-237	809
Owner Occ. 'Retirement Housing'	347	26	120	1,271	1,618
Rental 'Housing with Care'	133	10	25	204	337
Owner Occ. 'Housing with Care'	0	0	40	539	539

Source: EAC (2025 Q1), Mid-Year Population Estimates 2022 and Stantec analysis

²⁴ Net need sums only the positive requirements; doing otherwise would imply demolitions of housing types where Housing in Later Life requirements are exceeded, in this case Rental Retirement Housing.



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Table 4-10 presents the 2021 (current) and 2038 (future) requirement for specialist housing in South Ribble, in accordance with Housing in Later Life.

This shows that in South Ribble, there is a current gross need for 2,746 units of specialist housing in 2021 which increases to 3,905 in 2038 given the projected increase in the 75+ population. For net need, these figures are 1,560 for 2021 and 2,435 for 2038.

Table 4-10: Current and Future Requirements for Specialist Housing for Older People in South Ribble

2021					
Specialist Housing Type and Tenure	Current provision (number of units)	Current units per 1,000 residents aged 75+	Target units per 1,000 residents aged 75+	Required Increase or decrease	Resulting number of units
		per 1,000 residents aged 75+			
Rental 'Retirement Housing'	976	87	60	-303	673
Owner Occ. 'Retirement Housing'	408	36	120	937	1,345
Rental 'Housing with Care'	44	4	25	236	280
Owner Occ. 'Housing with Care'	62	6	40	386	448
2038					
Rental 'Retirement Housing'	976	61	60	-20	956
Owner Occ. 'Retirement Housing'	408	26	120	1,505	1,913
Rental 'Housing with Care'	44	3	25	354	398
Owner Occ. 'Housing with Care'	62	4	40	576	638

Source: EAC (2025 Q1), Mid-Year Population Estimates 2022 and Stantec analysis



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Table 4-11 presents the 2021 (current) and 2038 (future) requirement for specialist housing in Chorley, in accordance with Housing in Later Life.

This shows that in Chorley, there is a current gross need for 2,668 units of specialist housing in 2021 which increases to 4,094 in 2038 given the projected increase in the 75+ population. For net need, these figures are 1,616 for 2021 and 2,960 for 2038.

Table 4-11: Current and Future Requirements for Specialist Housing for Older People in Chorley

2021					
Specialist Housing Type and Tenure	Current provision (number of units)	Current units per 1,000 residents aged 75+	Target units per 1,000 residents aged 75+	Required Increase or decrease	Resulting number of units
		per 1,000 residents aged 75+			
Rental 'Retirement Housing'	673	62	60	-20	653
Owner Occ. 'Retirement Housing'	226	21	120	1,081	1,307
Rental 'Housing with Care'	143	13	25	129	272
Owner Occ. 'Housing with Care'	30	3	40	406	436
2038					
Rental 'Retirement Housing'	673	40	60	330	1,003
Owner Occ. 'Retirement Housing'	226	14	120	1,779	2,005
Rental 'Housing with Care'	205	12	25	213	418
Owner Occ. 'Housing with Care'	30	2	40	638	668

Source: EAC (2025 Q1), Mid-Year Population Estimates 2022 and Stantec analysis



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Table 4-12 presents the 2021 (current) and 2038 (future) requirement for specialist housing across Central Lancashire, in accordance with Housing in Later Life.

Table 4-12: Current and Future Requirements for Specialist Housing for Older People in Central Lancashire

2021					
Specialist Housing Type and Tenure	Current provision (number of units)	Current units per 1,000 residents aged 75+	Target units per 1,000 residents aged 75+	Required Increase or decrease ²⁵	Resulting number of units
		per 1,000 residents aged 75+			
Rental 'Retirement Housing'	2,695	84	60	0	1,926
Owner Occ. 'Retirement Housing'	957	30	120	2,896	3,853
Rental 'Housing with Care'	259	8	25	544	803
Owner Occ. 'Housing with Care'	92	3	40	1,192	1,284
2038					
Rental 'Retirement Housing'	2,695	58	60	330	2,768
Owner Occ. 'Retirement Housing'	981	21	120	4,555	5,536
Rental 'Housing with Care'	382	8	25	771	1,153
Owner Occ. 'Housing with Care'	92	2	40	1,753	1,845

Source: EAC (2025 Q1), Mid-Year Population Estimates 2022 and Stantec analysis

²⁵ For all three areas, retirement housing for rent exceeds the housing in life target rates in 2021, however as the demolition of homes would be inappropriate, for the Central Lancashire total this has been represented with 0 as 0 retirement housing for rent is needed. For 2038, retirement housing for rent exceeds the housing in life target rates in South Ribble and Preston. However, as 330 units are required to meet target rates in Chorley the total net need for South Lancashire is 330 for this tenure.



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Across Central Lancashire, there is a current gross need for 7,868 units of specialist housing in 2021 which increases to 11,302 in 2038 given the projected increase in the 75+ population in all three areas. For net need, these figures are 4,632 for 2021 and 7,409 for 2038. Table 4-13 puts these housing need figures in context with the recommendations of the HNDAs.

Table 4-13: Stantec and Arc4 Gross and Net Specialist Housing Need Figures 2038

	2038 Gross Need			2021 - 2038 Net Need		
	Arc4	Stantec	Difference	Arc4	Stantec	Difference
Preston	4,148	3,303	-845	1,070	2,014	944
South Ribble	1,946	3,905	1,959	438	2,435	1,997
Chorley	1,301	4,094	2,793	453	2,960	2,507
Central Lancashire	7,395	11,302	3,908	1,961	7,409	5,448

Source: 2022 HNDAs, Stantec analysis

4.2.7 Could Central Lancashire's Housing requirements be more ambitious?

The NPPF Annex 2 defines older people as 'people over or approaching retirement age, including the active, newly – retired through to the very frail elderly; and whose housing can encompass accessible, adaptable general needs housing through to the full range of retirement and specialist housing for those with care and support needs.' Following this definition, we compare the supply of specialist housing to the number of households comprised exclusively of state pension age residents.

The scope to increase supply for specialist housing beyond those arrived at using 'Housing in Later Life' benchmark provision rates is illustrated by the total number of state pension aged only households who do not have any specialist housing options open to them currently (2021) and the number projected to have none in the future (2038). We have made the reasonable assumption that households will seek homes of the same tenure they already have, so this analysis considers owner occupiers and renters separately.



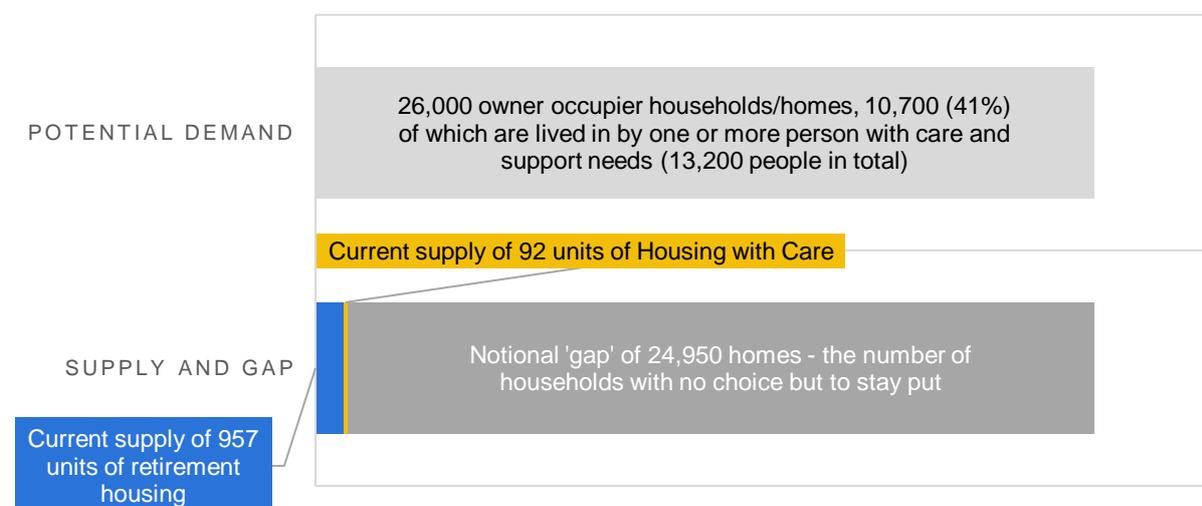
Central Lancashire Housing Need

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Figure 4-2 shows the current (2021) gap between the supply of specialist owner occupier homes across Central Lancashire using data on the number of owner occupier specialist homes built no later than 2021 from the EAC database, and potential demand, for which we have used the number of owner occupier households comprised only of those aged 66 and over in 2021.

In 2021, there were 92 owner occupier units of housing with care, and 957 units of owner occupier retirement housing, totalling 1,049 units of owner occupier housing. Across Central Lancaster there were approximately 26,000 owner occupier households comprised totally by those aged 66 and over. This leaves 24,950 owner occupier pension aged households with no specialist housing options open to them.

Figure 4-2: Central Lancashire Demand and Supply Older Owner Occupiers 2021



Source: 2021 Census Custom Dataset, ONS 2018-based Population Projections, EAC 2025 Q1 and Stantec analysis



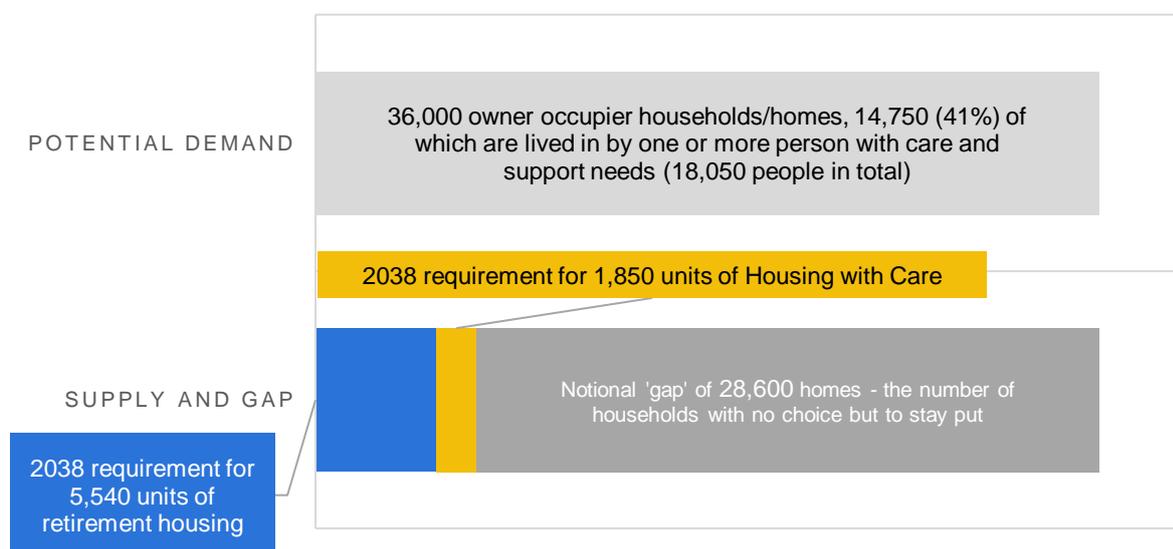
Central Lancashire Housing Need

4 Specialist Housing for Older People Need

Figure 4-3 presents the supply and potential demand situation projected for 2038 on the basis that Housing in Later Life requirements are achieved. With a projected 75+ population of 46,132 across Central Lancashire in 2038, meeting Housing in Later Life requirements requires a supply of 5,536 owner occupier retirement units and 1,845 owner occupier units of housing with care.

Stantec Development Economics estimates the number of 66+ Central Lancashire residents will reach 91,100 in 2038, 88,000 of which will live in households. Of them, 68,800 will reside in households comprised completely of those aged 66 and over, making up 43,400 such households. Of these, 36,000 are expected to be owner occupiers, 28,600 of which will be left with no specialist housing options in 2038 even if Housing in Later Life requirements are met, as shown in Figure 4-3. While the ratio of specialist housing to owner occupier 66+ households falls from 25 to 1 to 5 to 1 in this scenario, the number of 66+ owner occupier households increases by 3,650 (15%), indicating that growth in potential demand is outstripping supply.

Figure 4-3: Central Lancashire Demand and Supply Older Owner Occupiers 2038



Source: 2021 Census Custom Dataset, ONS 2018-based Population Projections, EAC 2025 Q1 and Stantec analysis

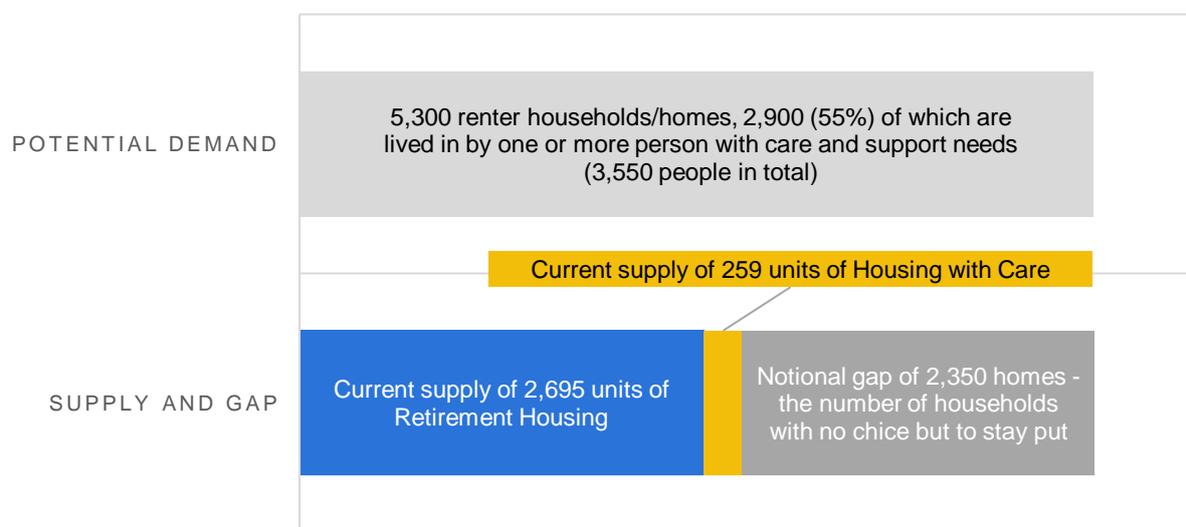


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4 Specialist Housing for Older People Need

Figure 4-4 and Figure 4-5 show the supply and demand picture for renters in Central Lancashire in 2021 and 2038 (assuming Housing in Later Life requirements are met) respectively. In 2021 the number of renting households aged 66+ is estimated at 5,300, 2,900 of which are lived in by at least one person with care and support needs. There are 2,954 units of specialist housing as of 2021, and therefore a notional gap of 2,350 households with no appropriate specialist housing options to move into.

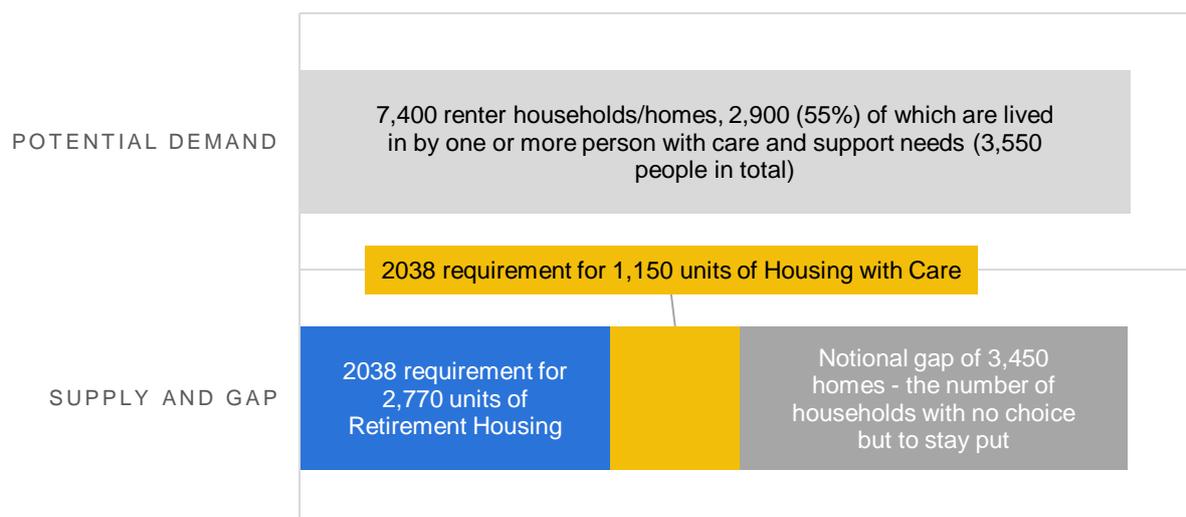
Figure 4-4: Central Lancashire Older Renting Households 2021



Source: 2021 Census Custom Dataset, ONS 2018-based Population Projections, EAC 2025 Q1 and Stantec analysis

The number of renting households aged 66+ is projected to increase to 7,400 by 2038. If Housing in Later Life requirements are met, there will be a supply of 2,770 units of rental retirement housing and 1,150 units of housing with care for rental. This will leave 3,450 older renting households with no specialist housing options open to them, an increase of 1,100 (47%).

Figure 4-5: Central Lancashire Older Owner Occupier Households 2038



Source: 2021 Census Custom Dataset, ONS 2018-based Population Projections, EAC 2025 Q1 and Stantec analysis



4.3 Specialist Housing Key Findings

It is the opinion of Stantec Development Economics that there are several problems with the analysis used by Arc4 for calculating specialist housing need in the HNDAs of the Central Lancashire Authorities. Firstly, there appears to be a mistake in the population data used to calculate specialist housing need in South Ribble which has led to an under estimation of gross and net need. Secondly, the Arc4 methodology calculates the current rate of provision and assumes this is appropriate without consulting established evidence on what a desirable provision rate is. It then extends this rate into the future, baking in under provision. Finally, the HNDAs do not provide any breakdown of housing type within the overall umbrella of specialist housing. The older population covers a diverse group of people with varying levels of required support and tenure preferences. Therefore, the mix of specialist housing must reflect this variation to be considered appropriate and to best serve residents.

Table 4-14 displays the results of both Stantec’s and Arc4’s analysis for 2038. The differences in the need figures are largely due to the different provision rates required per resident aged 75 and over. Stantec Development Economics calculates that gross need for specialist housing across Central Lancashire is 11,302 in 2038 while Arc4’s figure for gross need is 7,395. Net need, from the current (2021) position, is 7,409 from Stantec Analysis while that of Arc4 is 1,961 – a roughly fourfold difference.

Table 4-14: Stantec and Arc4 Gross and Net Specialist Housing Need Figures 2038

	2038 Gross Need			2021 - 2038 Net Need		
	Arc4	Stantec	Difference	Arc4	Stantec	Difference
Preston	4,148	3,303	-845	1,070	2,014	944
South Ribble	1,946	3,905	1,959	438	2,435	1,997
Chorley	1,301	4,094	2,793	453	2,960	2,507
Central Lancashire	7,395	11,302	3,908	1,961	7,409	5,448

Source: 2022 HNDAs, Stantec analysis

While Stantec’s specialist housing need figures, derived from Housing in Later Life evidence, are significantly higher than Arc4’s, evidence suggests that there is scope to increase the stock of specialist housing even further. Meeting the housing need figures presented by Stantec Development Economics will result in 28,450 pension aged households with no specialist housing options, an increase of 15% from current levels. The equivalent figure for renting pension aged households is 3,450, an increase of 47%. As such, the Housing in Later Life requirements should be seen as a floor and not a ceiling on development.



5 Employment-Driven Growth

This section comprises a review of the economic and employment land needs growth and the impact this has on housing demand. The local property market is analysed to provide an overview of how this may affect employment growth.

5.1 Employment Scenarios

Stantec have looked at Cambridge Econometrics and Oxford Economics jobs projections over the plan period for Central Lancashire. The Cambridge Econometrics projection is set out in the Central Lancashire Housing Study 2024. It shows a pessimistic expectation of total jobs growth over this period across all three authorities, particularly in the early years. This is due to the impact of inflation and labour market constraints seen across the country. It also excludes employment projects in the region such as the National Cyber Force which will be located in South Ribble. Turley have noted that the NCF has the potential to directly or indirectly create 3,120 jobs throughout the North West over ten years from 2025, with Central Lancashire having the opportunity to retain a substantial proportion²⁶.

Table 5-1 shows the jobs projections as forecast by Cambridge Econometrics and Oxford Economics over the plan period 2023 to 2041.

Table 5-1: Jobs growth projections, Cambridge Econometrics and Oxford Economics (2023 – 2041)

Local Authority	2023 - 2041			
	Cambridge Econometrics		Oxford Economics	
	Growth (N)	CAGR Growth (%)	Growth (N)	CAGR Growth (%)
Chorley	5,675	0.60%	5,420	0.65%
Preston	5,493	0.30%	12,070	0.62%
South Ribble	5,492	0.60%	9,060	0.79%
Total	16,660	0.45%	26,550	0.67%

Source: Central Lancashire Housing Study (2024) and Oxford Economics (2025), Stantec analysis

As displayed on Table 5-1, Cambridge Econometrics forecast total jobs growth in Central Lancashire to be 16,660 between 2023 and 2041, a CAGR (compound annual growth rate) of 0.45%. Oxford Economics portray a more optimistic view of employment growth in Central Lancashire, forecasting a 26,550 increase in jobs between 2023 and 2041, 0.67% CAGR.

²⁶ The 1,500 estimated is a figure for direct and indirect jobs in Central Lancashire, and is based on a total direct jobs figure of 2,000 from [The Lancashire Growth Plan 2025 to 2035](#) (Consultation Version published February 2025).



5.1.1 Household Estimates

Stantec has produced housing estimates based on the above job projections using the following assumptions set out in Table 5-2.

Table 5-2: Dwellings Estimate Assumptions

Parameter	Note	Ratio
Increased employment	Cambridge Econometrics and Oxford Economics Projections	N/A
Working in Central Lancs/ From Home	Proportion of increased employment to be met by Central Lancashire residents	0.97
Unemployment Rate	Unemployment as a proportion of economically active	0.03
Economic Activity	Ratio of people of working age in employment	0.77
Dependency Ratio	Current ratio of working age population	0.61
Residents per dwelling	ONS Household Projections (2041)	2.22
Vacancy Rate	To convert inhabited to total dwellings	0.37
Local Plan Period	To convert total to annual figures	18

The analysis includes:

- Jobs projection numbers from Cambridge Econometrics and Oxford Economics.
- Commuting rates, taken from Census figures. Census commuting rates are the proportion of the local authority that live and work in that local authority. It also includes those that mostly work from home²⁷.
- Unemployment Rate, derived from number in employment and number economically active in the Annual Population Survey.
- Nomis data taken from the Annual Population Survey on economic activity rates for those aged 16-64.
- Census data on age of household members are used to give a proportion of the population for each local authority which is of working age (assumed to be 16-64).
- The population associated with dwellings provided is based on ONS projections for average household size by local authority for 2041 (the end of the plan period).
- Vacancy rate taken from MHCLG Live Table 100 and Live Table 615 to determine percentage of vacant dwellings as a proportion of all dwellings.

The analysis displayed in Table 5-3 concludes that the expected level of employment increase in Central Lancashire will see an increase in housing need of between 16,335 and 27,555 households

²⁷ This adjustment has not though been made when accounting for the NCF, since it has been separately estimated by Turley that around 1,500 workers in Central Lancashire could be needed to fill jobs that it will directly or indirectly create – i.e. there was no need to make a further commuting rate adjustment to this figure.



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over the plan period 2023 to 2041 depending on the scenario followed. This equates to 907, 1,446 and 1,531 houses per annum respectively for the low, mid and high scenarios over the plan period 2023-2041.

We note that for the Low scenario, the 907 dwellings per annum is lower than the estimate of 1,237 presented in the Housing Study Update, also based on the Cambridge Econometrics forecasts. We do not have access to the Edge Analytics modelling used to generate these estimates, so it is not possible to identify what has led to this difference (other than the 1-to-1 commuting assumption made in the Housing Study Update, which would only explain a small part of it). Nevertheless, it is notable that different assumptions could lead to the same employment growth figures generating a higher housing requirement.

The 'Mid' scenario produces annual housing need well in excess of the 1,314 dpa from the draft Local Plan. The 'High' scenario, accounting for the establishment of the NCF, increases it to more than 200 dpa above that requirement.

Table 5-3: Dwellings increase estimates from job growth projections (2023 – 2041)

	Assumption	Low (Cambridge)	Mid (Oxford)	High (Oxford + 1,500 (NCF))
Increased employment	N/A	16,660	26,550	28,050
Working in Central Lancs/ From Home	97%	16,092	25,645	27,145
Unemployment Rate	3%	16,519	26,325	27,865
Economically Active Ratio	77%	21,442	34,170	36,169
Dependency Ratio	61%	35,028	55,822	59,087
Residents per dwelling	2.22	15,747	25,094	26,562
Vacancy Rate	3.7%	16,335	26,032	27,555
Local Plan period (per annum) Dwellings per annum	18	907	1,446	1,531

Source: Various, Stantec analysis

5.2 Central Lancashire Property Market Analysis

5.2.1 Industrial

The data we have used is derived from a single source, CoStar's Commercial Real Estate Market Analytics (CoStar Analytics). CoStar Commercial Real Estate is a global real estate information and analytics company that provides comprehensive data on property markets. This provides access to an extensive and comprehensive database of verified property-level data, including type, status, floorspace, use and year built or renovated.

CoStar Analytics collates, categorises and aggregates the property data, updates it on a quarterly basis, and provides a platform for bespoke area analysis, by property type and size, of relevant metrics such as floorspace inventory, deliveries, leasing activity and vacancy rates.

For this review, we have analysed CoStar Analytics data tagged as relating to the Industrial and Light Industrial property type, hereafter referred to as Industrial property / floorspace. In addition, we have



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filtered the data by the following secondary building types; distribution (including light distribution) warehouse and no secondary type.

The characteristics we have examined are:

- a) Change in floorspace inventory and characteristics of the existing stock,
- b) Vacancy rates (across the inventory) and availability (of floorspace to potential occupiers, whether presently vacant or not),
- c) Floorspace delivery (of new buildings or additional space), gross absorption (move-ins) also known as take-up, and net absorption (move-ins less move-outs) also known as net take-up.

5.2.1.1 Floorspace Inventory

Table 5-4 shows the industrial floorspace inventory across Central Lancashire in relation to Lancashire. The floorspace inventory in Central Lancashire equates to 26.7 million sq. ft of industrial floorspace, which is 23% of the floorspace across Lancashire (113.9 million sq. ft).

Table 5-4: Industrial Floorspace Inventory (Q1 2025 QTD)

Inventory (all units)	Central Lancashire	Lancashire
2025 Q1 QTD	26,673,632	113,850,368

Source: CoStar 2025

Central Lancashire has seen an 11% increase in industrial floorspace over the last 10 years (Table 5-5) which equates to around 2.6 million sq. ft. Lancashire which has seen an 8% increase in industrial floorspace (8.6 million sq. ft) increase; therefore, Central Lancashire accounted for 30% of the increase in floorspace across Lancashire in the past 10 years.

Table 5-5: Change in Inventory Q1 2015 to Q1 2025 QTD

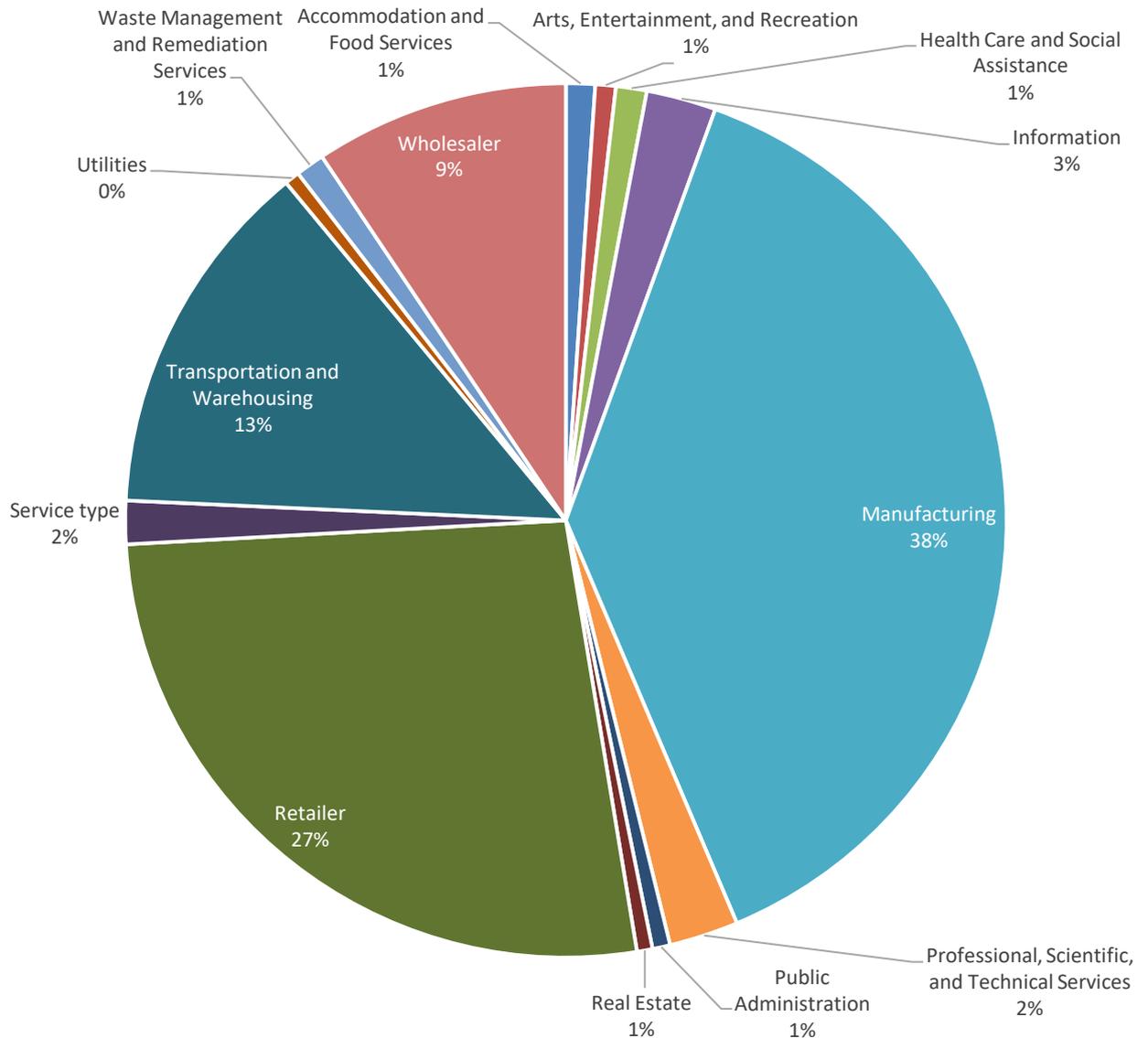
Change in inventory	Central Lancashire	Lancashire
Q1 2015 to Q1 2025 QTD	11%	8%
Sq. ft	2,612,054	8,564,865

Source: CoStar 2025



5.2.1.2 Existing Tenants

Figure 5-1: Existing Tenants in Central Lancashire



Source: CoStar 2025

The largest proportion of industrial and logistics tenants in Central Lancashire are within the retail industry (30%), following by the manufacturing industry (25%) and transportation and warehousing industry (15%). The largest occupier in Central Lancashire is Paccar a truck manufacturer who occupy 795,000 sq. ft in Leyland, South Ribble. Other large occupiers include InBev, Victorian Plumbing and Waitrose and Partners. This highlights the range of employment opportunities in Milton Keynes and shows the need for housing to allow employees to live within close proximity to their workplace to ensure they have a beneficial work life balance.



5.2.1.3 Vacancy Rates and Availability

Vacancy Rates are a measure of floorspace utilisation. If the vacancy rate falls below circa 7% there is an imbalance in the market and demand outstrips supply. The 7% equilibrium is a commonly accepted national benchmark in real estate economics and is often cited based on historical data and industry experts. This is the rate below which rental growth, as a result of a tightening of supply, can become unaffordable for occupiers. Figure 5-2 illustrates the vacancy rate in Central Lancashire and Lancashire over the past 10 years.

Figure 5-2: Industrial Vacancy Rates Q1 2015 to Q1 2025 QTD



Source: CoStar 2025

The vacancy rate has remained below the 7% equilibrium across Central Lancashire and Lancashire. Currently the vacancy rate in Central Lancashire is 5.4% and 4.9% in Lancashire which has increased since 2023, albeit remaining under the equilibrium, this is owing to the recent deliveries of new floorspace that has quickly been absorbed, indicating a growing job market. The low vacancy rate that has been seen over the period indicates a lack of space for current or potential businesses to move into. It is expected new vacancies will be quickly moved into after the current spike in vacancy; indeed, this is already happening as the vacancy rate is beginning to level out.

In addition to vacancy levels, we also assess the availability rate. The availability rate is a measure of all available floorspace. It differs from the vacancy rate in that the availability rate includes floorspace that is available by way of a sub-lease and buildings under construction that are available to pre-let when the building is complete. Figure 5-3 illustrates the availability rate in Central Lancashire and Lancashire over the last 10 years.

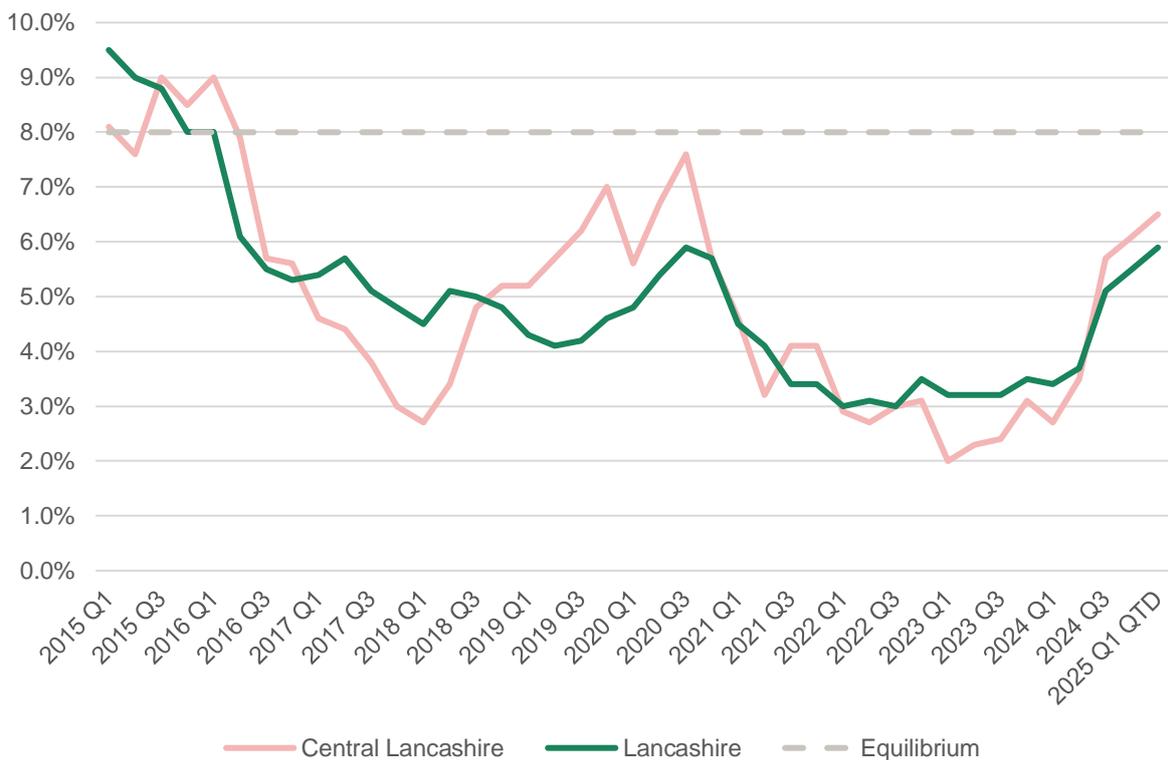


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The equilibrium availability rate is circa 8%. Similar to the vacancy rate, this is a nationally recognised benchmark used in real estate economics derived from historical data and industry experts. If the availability rate falls below this rate there is an excess of demand over supply in the market. This leads to some demand being suppressed as the current supply in the market cannot fulfil demand needs. The equilibrium for availability rates is slightly higher than that of vacancy rates given the inclusion of floorspace available by way of a sub-lease and buildings that have not yet reached practical completion.

The current availability rate in Central Lancashire is 6.5% and 5.9% in Lancashire. The availability rate for both has therefore been under the 8% equilibrium since around 2017.

Figure 5-3: Industrial Availability Rates Q1 2015 to Q1 2025 QTD



Source: CoStar 2025

5.2.1.4 Current and Future Stock

Table 5-6 and Figure 5-4 show the current and future pipeline stock in Central Lancashire that measure over 100,000 sq. ft Overall, there is a total of 2.2 million sq. ft available to occupiers; 1.1 million sq. ft of existing space and 1.1 million sq. ft of space in the pipeline (under construction and existing).

New employment sites such as Central 600 and Aptus, as well as major employers moving to the area like National Cyber Force, will need an increased number of employees and will attract new employees looking for work in the area. As a result, it is important there is appropriate, affordable housing stock available to ensure residents are living and working in close proximity to ensure they have a good work life balance and aren't enduring long commutes.

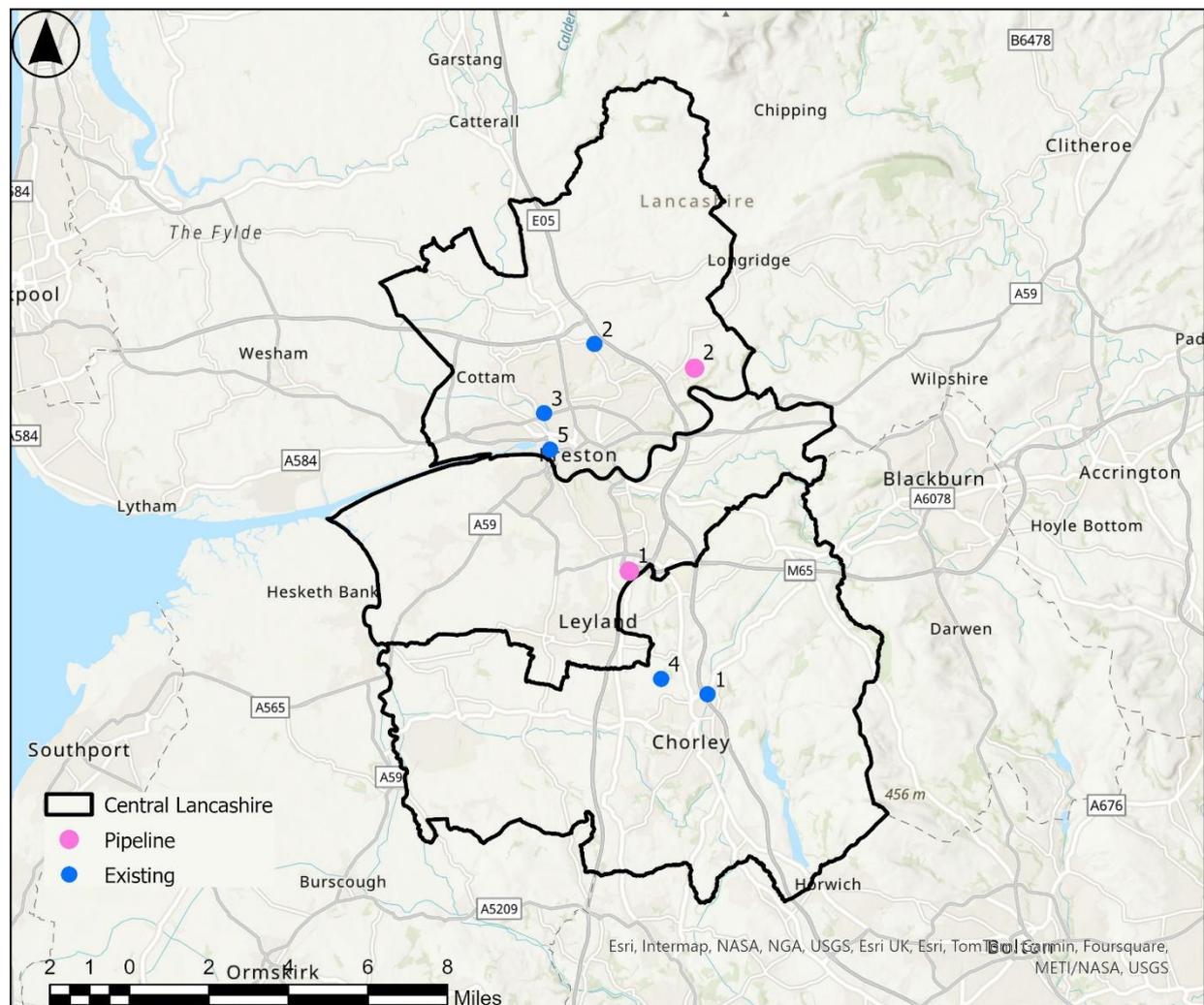


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Table 5-6: Existing and Pipeline Stock in Central Lancashire (100,000 sq. ft plus)

Address	Size	Year built	Comments
Existing			
Botany 158, Botany Bay Business Park	158,360	2024	New build unit.
1 Oliver's Place	152,878	1979	Aged. End of economic life.
Tulketh Mill	299,622	1907	End of economic life.
Revolution185	185,191	2015	Relatively new build.
Channel Way Business Park	290,000	1980	Aged. End of economic life.
Pipeline			
Central 600	605,976	New build.	
Aptus	500,000	New build.	Under construction.
Existing Total	1,086,051		Outline planning consent.
Pipeline Total	1,105,976		
Overall Total	2,192,027		

Figure 5-4: Existing and pipeline stock in Central Lancashire (100,000 sq. ft plus)



5.2.1.5 Gross and Net Absorption

Net absorption is the measure of the total space occupied less the total space vacated over a given period of time. If net absorption is positive, it means move-ins have been greater than move-outs over the period and vice versa.

Over time, positive net absorption is indicative of increasing demand. Of course, occupiers can only move into space that is available, which means that it is wholly undesirable to have no space available, which would only serve to suppress demand and create a barrier to economic growth.

Studied over time, net absorption and change in availability provides a basis for concluding whether the market is under supplied or not and for making floorspace demand projections based on past trends. All things being equal, net absorption (net take up) is a leading indicator of the market appetite for industrial floorspace.

The 10-year average net absorption across Central Lancashire was 366,000 sq. ft, with peaks in 2022 and 2023 equalling 623,000 and 567,000 sq. ft respectively. This indicates high demand in Central Lancashire given move-ins massively outstripped move-outs. This implies significant growth in industrial floorspace therefore employment growth facilitated by an affordable housing stock is imperative to allowing such economic growth to occur. Positive net absorption is in the context of historically low availability and vacancy rates in Central Lancashire, contributing to significant under supply of industrial space.

Figure 5-5: Gross absorption, net deliveries and availability rate Q1 2015 to Q1 2025 QTD



Source: CoStar 2025



Gross absorption is another leading indicator of the market's appetite for industrial floorspace (Figure 5-5). Gross absorption differs from net absorption in that it doesn't consider floorspace that has been vacated. In the context of historically low availability and vacancy rates, under the equilibrium level that sees churn in the market, gross absorption doesn't account for moves out of the area. As previously discussed, occupiers may need to relocate to find space that better fits their business requirements. Figure 6.6 displays gross absorption alongside net deliveries and the availability rate.

Gross absorption over the last 10 years has averaged 540,000 sq. ft increasing to 566,000 sq. ft in the last 5 years indicating an uptick in demand in the past 5 years. At the same time, net deliveries have averaged 330,000 sq. ft per annum over the 10-year period increasing to 396,000 per annum. This highlights the relationship between net deliveries and absorption, showing that new space entering the market is in high demand and is being occupied quickly. For this to happen, the new space must attract residents from the surrounding area with attractive and affordable housing.

5.2.2 The North West Cyber Corridor

The North West Cyber Corridor in and around Lancashire is a significant hub for cyber security and digital innovation in the UK. The corridor benefits from the presence of major employers in the defence and intelligence sectors, such as BAE Systems, Raytheon, and Northrop Grumman, and hosts around 300 unique cyber security companies, contributing substantially to the local economy²⁸.

These companies play a crucial role in driving technological advancements and providing high-skilled employment opportunities. BAE Systems has a major presence in Samlesbury, and recently announced hundreds of new apprentice and graduate roles in Lancashire²⁹.

One of the most notable developments in the North West Cyber Corridor is the upcoming establishment of the National Cyber Force in Samlesbury. Set to open in 2025, the NCF is a partnership between the Ministry of Defence and intelligence agencies, aimed at enhancing the UK's cyber capabilities. As discussed above, Stantec understands that this is expected to create an estimated 1,500 direct and indirect jobs in Central Lancashire. The Lancashire Cyber Partnership will see the NCF collaborate with academic institutions and industry to support the Corridor's growth and success³⁰.

5.2.3 UCLan Expansion in Preston City Centre

UCLan (University of Central Lancashire) has undergone significant expansion in recent years to improve its facilities, campus, and student experience. Notable developments include the UCLan Student Centre, the Engineering Innovation Centre (EIC), and the Creative Arts Building. These projects provide state-of-the-art spaces for study, research, and creative work, while the Engineering and Health Building enhances training in healthcare and social work. The university has also prioritised

²⁸ The North West Cyber Corridor, Innovation Impact Study Evidence Base (2023), Perspective Economics [LancasterCyberCorridorImpactStudy.pdf](#)

²⁹ [BAE Systems reveals next recruitment drive in Lancashire | Lancashire Telegraph](#)

³⁰ [New Partnership for Cyber Collaboration - GOV.UK](#)



Central Lancashire Housing Need

5 Employment-Driven Growth

sustainability, focusing on energy-efficient buildings and green spaces as part of a broader campus regeneration.³¹

Looking ahead, UCLan has ambitious plans for further campus development as part of its long-term masterplan. This includes building new academic buildings, student accommodation, and modern facilities to meet the needs of a growing student population. The university also aims to integrate better with the city centre by improving pedestrian access, fostering a more connected and vibrant community for students, staff, and local residents.³²

UCLan plans to expand its research and innovation hubs, particularly in engineering, health, digital technologies, and sustainability. The university seeks to collaborate with industry and regional partners to drive innovation and contribute to local economic growth. Additionally, UCLan is focusing on regional economic development by equipping students with skills in key sectors, including digital tech, engineering, and healthcare, thus strengthening its role in the local economy.³³

The university also has a strong focus on enhancing the student experience and its cultural and community engagement. This includes providing more student support services, improving mental health resources, and offering opportunities for extracurricular involvement. UCLan is committed to expanding its international presence, building global partnerships, and increasing its role as a cultural and educational hub in Preston, ultimately contributing to the city's growth and long-term success.

The expansion of UCLan in Preston significantly impacts both employment and housing needs. The growth of the university creates direct job opportunities within UCLan, such as academic, research, and support roles, while also driving local job creation in construction, retail, hospitality, and services. The increased student population raises demand for student accommodation, putting pressure on the local housing market and potentially driving up rents. This creates opportunities for the development of new student housing and residential properties, both on and off-campus, to meet the growing demand. Overall, UCLan's expansion stimulates economic growth, job creation, and housing development, although it also necessitates strategic planning to manage housing pressures.

5.3 Key Findings

Stantec analysed job projections for Central Lancashire from Cambridge Econometrics and Oxford Economics, with the former predicting 16,660 new jobs and the latter 26,550 between 2023 and 2041. It has been estimated that a further 1,500 workers could be needed in Central Lancashire to fill jobs directly or indirectly created by the National Cyber Force.

Using Census data and employment assumptions, Stantec estimated the resulting housing demand. Based on economic activity rates, job-to-worker ratios, and commuting trends, the expected

³¹ <https://www.uclan.ac.uk/news/uclan-takes-ownership-of-60-million-student-centre-and-university-square#:~:text=Now%20open%2C%20the%20University%20Square,various%20University%20and%20public%20events>.

³² <https://investprestoncity.com/article/2892/University-of-Central-Lancashire-UCLan-Masterplan>

³³ <https://clock.uclan.ac.uk/11463/>



Central Lancashire Housing Need

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employment growth will require between 16,335 and 27,555 additional dwellings over the period (907 to 1,531 per annum) to accommodate the workforce.

The industrial floorspace inventory in Central Lancashire stands at 26.7 million sq. ft, representing 23% of Lancashire's total of 113.9 million sq. ft. Over the past decade, Central Lancashire's industrial floorspace has grown by 11% (2.6 million sq. ft), outpacing Lancashire's 8% increase (8.6 million sq. ft). This means that Central Lancashire has accounted for 30% of Lancashire's total growth in industrial floorspace over this period.

The region's largest industrial tenants are primarily in the retail (30%), manufacturing (25%), and transportation and warehousing (15%) industries. Major occupiers include Paccar, InBev, Victorian Plumbing, and Waitrose & Partners. With significant employment opportunities available, the report highlights the importance of affordable housing near workplaces to ensure a balanced work-life dynamic for employees.

Vacancy and availability rates remain below equilibrium levels, indicating strong demand for industrial space. The current vacancy rate in Central Lancashire is 5.4%, while the availability rate is 6.5%, both below the 7% and 8% industry benchmarks, respectively. Although new floorspace has been added, it is quickly absorbed, showing continued market demand. This suggests that sustained low availability could suppress demand and restrict business growth due to limited space options.

Net absorption, a key indicator of market demand, has averaged 366,000 sq. ft annually over the past decade, with peaks in 2022 and 2023. Gross absorption has also risen, reflecting increasing demand, while net deliveries have averaged 396,000 sq. ft per year in the last five years. This highlights the urgent need for new industrial space and a sufficient supply of affordable housing to accommodate the growing workforce and sustain economic expansion in the region.

In conclusion, the expansion of industrial floorspace in Central Lancashire is linked to job creation, as each new or expanded industrial facility requires employees to operate. As new developments like Central 600 and Alpus become occupied, workers will need housing close to their workplaces. It is clear that the continued industrial growth in Central Lancashire is likely to increase housing demand as new employees are drawn to the area.

UCLan's expansion enhances its facilities, including new buildings and research hubs, while increasing employment and supporting local economic growth. The growth drives higher demand for housing for both students and employees of the university.



6 Indicative Housing Need Conclusions

The Publication draft of the Central Lancashire Authorities' Local Plan 2023-2041 includes a housing requirement of 1,314 dwellings per annum. This is based on the Housing Study Update produced by DLP Planning in December 2024. On the basis of employment growth forecasts from Cambridge Econometrics, this study initially arrives at a housing need of 1,237 dwellings per annum (dpa) for the three authorities combined. This is above the requirement from standard method in NPPF2023, but below that from NPPF2024.

The housing need is then adjusted upwards by 77 dpa to 1,314 dpa (23,652 over the 2023-2041 plan period); this makes it 80% of standard method and therefore, given the timing of the local plan process, is proposed to be subject to the transitional provisions of the NPPF.

Standard method need was 1,643 dpa, or 29,574 over the plan period, at the time of the draft Local Plan. Following the release of 2024 affordability ratios in March 2025, Central Lancashire's figure has slightly increased to 1,662 (reducing the Plan figure % of standard method from 80.0% to 79.1%)³⁴. 80% of the new figure (1,662) would be 1,330 rather than 1,314.

Stantec Development Economics considers that there are clear reasons for exceeding the requirement identified by the Central Lancashire Authorities in the draft Local Plan, based on our analysis and reviews of the evidence.

Moreover, the allocation of housing requirements between the three authorities in the draft Local Plan substantially reduces the level and share assigned to Chorley – fully 41% lower than standard method. This may pose difficulties for delivering a sufficient level of housing, including affordable and specialist, there.

Draft Local Plan housing need figures, % difference vs NPPF 2024

	Preston	South Ribble	Chorley	Total
Standard method NPPF2024	590	489	564	1,643
Draft Local Plan	520	460	334	1,314
<i>% difference vs NPPF2024</i>	-12%	-6%	-41%	-20%

Source: Housing Study Update 2024, draft Local Plan, Stantec analysis

Affordable Housing

The HNDAs produced by Arc4 include estimates of affordable housing need. We have scrutinised these and consider that, while the approach taken is broadly reasonable, there are issues with their

³⁴ The 1,662 per annum breaks down to 616 in Preston, 492 in South Ribble, and 554 in Chorley and amounts to 29,916 over the plan period. Standard method figures will update again later in the year when new dwelling stock estimates are released (and will go up, outside the extremely unlikely case that there have been net demolitions).



Central Lancashire Housing Need

6 Indicative Housing Need Conclusions

methodology which, if addressed, increase net affordable need per annum from 831 to 1,364 (and that this may still be a cautious estimate).

We then evaluated the percentage of affordable housing need delivered under a range of scenarios, covering:

- The level of need: Arc4's estimates, or those incorporating Stantec's adjustments.
- Overall housing delivery; the 1,314 dpa from the draft Local Plan, or housing need under the new standard method (as published in December 2024, using 2023 affordability ratios) of 1,643 dpa.
- Affordable housing delivery rate – the 30% target from the draft plan, or historic rates of delivery (24.9% across the three authorities).

On affordability grounds, there is a clear case for delivering *at least* standard method housing need. Even on the most generous assumptions, this will result in only 59.3% of need being met – compared to 47.4% if only the requirement suggested in the Local Plan is delivered. More pessimistic assumptions – i.e. using Stantec's higher requirement for affordable need and historic delivery rates – could bring the percentage of need met as low as 26.7%.

The most significant difference between the unadjusted and adjusted estimates is in Chorley. The adjusted estimates of need exceed all measures of *overall* housing requirement, including standard method. This imbalance is most extreme when considering the housing requirements proposed in the Local Plan, which allocates need away from Chorley and into the other authorities.

Specialist Housing for Older People

The HNDAs also consider the need for specialist housing for older people. Here, Stantec considers that the approach is more fundamentally flawed than that used for affordable need. Rather than applying any evidence on the provision rate of specialist housing required, it simply 'bakes in' the current rate of provision per head of older population and estimates additional provision that would be required. This results in a net need of just 1,961 to 2038 (slightly before the end of the plan period).

Stantec estimates requirements using the 'Housing in Later Life' toolkit; a highly-respected means of providing cautious minimum estimates of need. This results in a requirement nearly four times higher than Arc4's – of 7,409 specialist housing units to 2038. Moreover, on the basis of these figures, in 2021 there was a net need of 4,632 – not 0 as the HNDAs methodology implies.

Moreover, even meeting the Housing in Later Life requirements would leave roughly 4 in every 5 older households (all members aged 66+) without a specialist housing option. This underlines the point that these are minimum requirements and exceeding them could deliver positive outcomes – i.e. allowing older households to remain independent and safe for longer, and freeing up larger homes suitable for families.

The need for specialist housing is predominantly for market housing – therefore provision of it doesn't detract from affordable need (and some affordable need is affordable specialist, i.e. sheltered housing for social rent). Nevertheless, the extent of need supports higher delivery; the cautious net need of 7,409 units is nearly one third of the plan requirement, but only one quarter of standard method need.



Central Lancashire Housing Need

6 Indicative Housing Need Conclusions

Employment-Driven Growth

The housing requirement in the draft plan is based heavily on employment forecasts from Cambridge Econometrics. Stantec considers this to be relatively cautious; it forecasts jobs growth of 16,660 over the plan period, whereas Oxford Economics forecasts estimate an increase of 26,550 – almost 60% higher. Moreover, neither set of forecasts accounts for the planned establishment of the National Cyber Force headquarters in Samlesbury. They do not therefore account for the additional jobs that would be based in Central Lancashire as a result of this investment, with the area clearly having the opportunity to retain a substantial proportion of the 3,120 jobs estimated to be directly or indirectly created throughout the North West. Ignoring these jobs equally fails to recognise the need for housing generated by the individuals who fill them, with Turley considering it reasonable to assume that 1,500 of the jobs created by the NCF will be filled by people needing a home nearby.

Translating jobs growth into dwellings requirements, we estimate that:

- The 16,660 additional jobs in the Cambridge Econometrics forecast would require 16,335 additional dwellings, 907 dpa.
- The 26,550 additional jobs in the Oxford Economics forecast would require 26,032 additional dwellings, 1,446 dpa.
- Adding the 1,500 workers needed to fill jobs directly or indirectly created at the National Cyber Force HQ to the above would require 27,555 additional dwellings, 1,531 dpa.

The plan housing requirement is 1,314 dpa. Delivering this would therefore support only the most cautious employment growth scenario. Allowing for an alternative estimate of baseline employment growth results in housing need over 100 dpa higher. Meeting the plan requirement for housing only would either result in this growth being suppressed or in increased unsustainable patterns of commuting.

Moreover, the impact of the NCF HQ should be accounted for. This takes dwellings growth required to support employment growth further above the plan requirement. Delivering standard method need of 1,643 dpa would accommodate this requirement and leave a small amount of additional headroom for further growth.

The Consultation Version of The Lancashire Growth Plan notes that

*The LCCA [Lancashire Combined County Authority], in working in conjunction with local planning authorities, and by engaging key partners such as Homes England, creates the potential to substantially increase, renew, and diversify the housing stock within the county. It can help the pre-existing regional house building industry to do more and attract major investment to accelerate other forms of house building projects, such as large-scale urban regeneration and new settlements. The modern workforce that Lancashire aspires to increasingly requires a more diverse housing offer that aligns closely with the strengths and potential of the county. Deploying new and future devolved powers and resources are key to achieving the form of **joined-up economic and housing growth that can directly contribute to***



delivering the Government's growth missions and realising Lancashire's full potential.³⁵ (our emphasis)

There is a strong case for all Lancashire authorities to plan for growth given the county's distinctive strengths in growing sectors like cyber, defence, clean growth, and advanced engineering and manufacturing. Central Lancashire is no exception and delivering less than standard method need risks undermining its enormous growth potential.

Housing Need Conclusions

To summarise:

- The draft Local Plan uses an arbitrary adjustment to reach a housing requirement which is 80% of standard method (and therefore proposed to be subject to the transitional provisions of the NPPF 2024).
- The HNDAs estimate net annual affordable need to be 831. Stantec's adjustments increase this to 1,364.
- The HNDAs estimates of need for specialist housing for older people are flawed, and Stantec estimates a net need nearly four times higher (7,409 rather than 1,961).
- Employment forecasts informing the Local Plan are very pessimistic and 'policy-off'. Addressing this implies a housing need above that from the draft Local Plan.

Stantec Development Economics consider that at least NPPF2024 standard method need should be delivered. This is **1,643 dwellings per annum** (split by authority: 590 in Preston, 489 in South Ribble, and 564 in Chorley) or **29,574 over the 18-year plan period.**

Delivering this level of housing would: allow a higher proportion (though still not all) of affordable housing need to be met; ease delivery of specialist housing requirements within overall need; and support continued, sustainable growth of high-tech employment in Lancashire.

Taking forward the lower figure from the draft Local Plan would compromise these objectives as follows:

- A significantly lower proportion of affordable housing need would be met.
- Accommodating the identified need for specialist housing for older people (which we consider to be a cautious minimum) within overall housing delivery would be more challenging.
- Dwellings growth would not be sufficient to accommodate even the growth scenario based on Oxford Economics forecasts alone, let alone the higher scenario which accounts for the impacts of the NCF. This would result in increased unsustainable commuting and/or suppressed employment growth.

³⁵ [The Lancashire Growth Plan 2025 to 2035](#), page 32



Central Lancashire Housing Need

6 Indicative Housing Need Conclusions

- Government policy is to significantly increase housebuilding and improve affordability, with a target of 1.5 million new homes over the course of this parliament³⁶. Local targets under standard method have been set to meet these policy goals, so delivering less makes their achievement less likely.

Therefore, NPPF2024 standard method need should be met.

³⁶ [Planning overhaul to reach 1.5 million new homes - GOV.UK](#)



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Appendix E – Housing Land Supply



Central Lancashire Draft Regulation 19 Local Plan

Housing Land Supply Assessment

On behalf of **A Consortium of Housebuilders**

Document Control Sheet

Project Name: Central Lancashire Draft Local Plan

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Report Title: Housing Land Supply Assessment

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For and on behalf of Stantec UK Limited				

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Appendix B: Site Proformas Assessments

1 Introduction

- 1.1 Stantec is instructed by Story Homes, Persimmon Homes, Wain Homes, Taylor Wimpey, and Northern Trust (collectively known as the 'Consortium') to undertake a review of the housing land supply for Central Lancashire as set out in the Regulation 19 Local Plan consultation.
- 1.2 The purpose of the Assessment is to ascertain whether the emerging Local Plan has identified a sufficient supply of housing land to meet Central Lancashire's housing needs over the emerging plan period of 2023-2041. This will include assessing whether the Local Plan can demonstrate a 5-year housing land supply (plus buffer) at the point of adoption.
- 1.3 The Consortium comprise national and regional housebuilders and land promoters with considerable experience of delivering homes across Central Lancashire. The Consortium is focused on ensuring that Central Lancashire's emerging Local Plan contains a sufficient supply of housing land to meet its housing needs.
- 1.4 This assessment should be read alongside a report prepared by Stantec which undertakes an assessment of the Local Plan's housing needs. For the avoidance of doubt, this assessment focusses only on the housing land supply and, where reference is drawn to the Council's stated housing requirement or housing needs, it should not be inferred that we agree that requirement or need is correct.
- 1.5 It is the collective commitment and desire of the Consortium to deliver much needed homes in Central Lancashire and would like to see the Local Plan progress as expediently as possible. However, having reviewed the Regulation 19 version of draft Local Plan, it is considered that the housing land supply identified by the Central Lancashire authorities, both overall and in the immediate term, is insufficient and will not deliver the number homes required.

Contextual Background

- 1.6 The emerging Central Lancashire Local Plan is a joint plan being prepared by the local authorities of Preston City Council, South Ribble Borough Council and Chorley Council. The Central Lancashire authorities have a history of working collaboratively, having produced the Central Lancashire Core Strategy in 2012. The emerging Central Lancashire Local Plan will supersede the Core Strategy, and the individual Local Plans which were produced by the authorities in the mid-2010s.

- 1.7 Draft Local Plan Policy HS1 states that the housing requirement for Central Lancashire is 23,652 dwellings, which equates to 1,314 homes annually over the plan period. This housing requirement is based on an employment-led scenario plus an additional 77 dwellings per annum.
- 1.8 The Regulation 19 consultation contains a range of evidence base documents which have informed the preparation of the draft Local Plan, including the Central Lancashire Strategic Housing and Economic Land Availability Assessment (SHELAA) (2025). The SHELAA sets out that the Central Lancashire housing supply is sufficient to accommodate 13,440 dwellings.
- 1.9 All the sites in the SHELAA which contribute to the 13,440 figure were allocated for housing development. Other components of Central Lancashire's housing land supply include sites build-out during the preparation of the emerging Local Plan (2,501 dwellings) existing commitments (6,499 dwellings) and a windfall allowance has also been included for housing supply in Chorley and South Ribble (3,139).
- 1.10 In total, the stated housing land supply in the emerging Central Lancashire Local Plan is claimed as being sufficient to accommodate 25,579 dwellings over the plan period.
- 1.11 In the Housing and Employment Allocations: Site Selection Process (2025) document the authorities state that, whilst Chorley Council is unable to meet its housing needs without Green Belt release, housing requirements have been distributed across Central Lancashire in such a way as to avoid the release of Green Belt land, with Preston and South Ribble councils accommodating Chorley's unmet housing need.
- 1.12 The Consortium is of the opinion, having reviewed the evidence published to support the emerging Local Plan, that the claimed housing land supply in the Plan is exaggerated and overestimates the quantum of development that it can accommodate over the plan period. Whilst we remain keen to see a development plan adopted it must only be adopted if it is sound. The Consortium is concerned with the approach taken to assessing the housing land supply (including the method by which sites were selected) and the conclusions drawn as to the level of housing that it will deliver. We consider that the Plan as currently prepared is flawed and if progressed to examination in its current form should be found unsound.

Structure

- 1.13 The following sections of this Assessment is structured as follows:

- **Section 2 – National Housing Supply Context:** this section sets out the relevant housing land supply planning policy and guidance which frames the plan making process.
- **Section 3 – SHELAA Methodology and the Allocations Site Selection Process:** this section provides commentary on the SHELAA methodology and the housing allocations site selection process.
- **Section 5 – Methodology:** this section sets out our approach to assessing Central Lancashire’s housing land supply.
- **Section 4 – Chorley:** this section considers and critiques components of Chorley’s housing land supply.
- **Section 5 - Preston:** this section considers and critiques components of Preston’s housing land supply.
- **Section 6 – South Ribble:** this section considers and critiques components of South Ribble’s housing land supply.
- **Section 7 - Summary and Conclusions:** summarises the main findings of the Assessment and provides an alternative housing land supply figure.

2 National Housing Supply Context

- 2.1 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally prepared plans can provide for housing in a sustainable manner. The NPPF should be read alongside the Planning Practice Guidance (PPG) which provides information on the interpretation and implementation of the NPPF.

- 2.2 A High Court decision in January 2025 ruled that the PPG should not be considered subservient to the NPPF, with the two documents having an equivalent status.¹

National Planning Policy Framework

- 2.3 The updated NPPF published in December 2024 included transitional arrangements to allow development plan documents already in progress to proceed under the previous NPPF regime in certain scenarios. Where an emerging development plan has reached Regulation 19 on or before the 12th of March 2025, previous NPPF policies will apply where the draft housing requirement meets at least 80% of local housing need (inter alia).

- 2.4 The Regulation 19 version of the Central Lancashire Local Plan was published for consultation on the 24th of February 2025 and the Central Lancashire authorities confirm at paragraph 4.19 that 80% of local housing need is being planned for by its draft requirement. Accordingly, the transitional arrangements of the updated NPPF are engaged and policies of the December 2024 NPPF applicable, allowing the Local Plan to be examined under the provisions of the December 2023 version of the NPPF.

- 2.5 To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method (paragraph 62).

Chapter 5 – Delivering a Sufficient Supply of Homes

- 2.6 At paragraph 69, the Government states that planning policies should identify a supply:
 - a) Specific, deliverable sites for years one to five of the plan period (with an appropriate buffer); and

¹ Mead Realisations Ltd v Secretary of State for Housing, Communities and Local Government & Anor [2025] EWCA Civ 32

- b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 2.7 Local authorities should also support the development of windfall sites and make an allowance for windfall development as part of anticipated supply where there is compelling evidence that they will provide a reliable source of supply, having regard to historic windfall delivery rates and expected future trends (paragraphs 69-71).
- 2.8 At Annex 2: Glossary of the NPPF, the Government provides the following definition of the 'deliverable':

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

- a) *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
 - b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'*
- 2.9 In addition, the following definition is provided for 'developable': To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Planning Practice Guidance

Housing supply and delivery

Demonstrating a 5-year Housing Land Supply

- 2.10 Evidence to demonstrate a site's deliverability may include:
- 'current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters,

or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;

- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects (paragraph: 007 Reference ID: 68-007-20190722).’

Demonstrating a housing land supply beyond 5 years.

2.11 Local planning authorities should identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. Local plans and spatial development strategies may be able to satisfy the tests of soundness where they have not been able to identify specific sites or broad locations for growth in years 11-15. However, if longer-term sites are to be included, for example as part of a stepped requirement, then plan-makers will need to demonstrate that there is a reasonable prospect that they are likely to come forward within the timescale envisaged (paragraph: 010 Reference ID: 68-019-20190722).

2.12 In demonstrating that there is a ‘reasonable prospect’ plan-makers can use evidence such as (but not exclusively):

- written commitment or agreement that relevant funding is likely to come forward within the timescale indicated, such as an award of grant funding;
- written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;
- likely buildout rates based on sites with similar characteristics; and
- current planning status - for example, a larger scale site with only outline permission where there is supporting evidence that the site is suitable and available, may indicate development could be completed within the next 6-10 years.

2.13 A pragmatic approach is appropriate when demonstrating the intended phasing of sites. For example, for sites which are considered developable within 6-10 years, the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond. When producing annual updates of the housing land supply trajectory, authorities can use these to provide greater certainty about the delivery of sites initially considered to be developable, and those identified over a longer time span.

3 Central Lancashire’s Housing Land Supply

3.1 This section provides a summary of Central Lancashire’s proposed housing land supply as set out in the Regulation 19 Local Plan and housing evidence base documents which underpin it.

Central Lancashire Regulation 19 Local Plan 2023-2041

3.2 Draft Local Plan Policy HS1 states that the housing requirement for Central Lancashire for the period of 2023-2041 is 23,652 dwellings, equating to 1,314 dwellings a year. To meet this identified housing need, housing is to be distributed across the three Central Lancashire authorities in the context of the proposed spatial strategy and settlement hierarchy.

3.3 A number of sites have been allocated as ‘strategic sites’. These large-scale allocations are central to the delivery of the proposed spatial strategy. The proposed strategic sites and their capacity is as follows:

Draft Strategic Policy	Site	Capacity (units)
SS3	North West Preston / Bartle	2,767
SS4	Fulwood Barracks	300
SS5	Preston West	1,850*
SS6 (A and B)	Pickering’s Farm	1,895

*450 dwellings are anticipated to be delivered beyond the plan period of 2041.

3.4 In addition to the strategic sites, a number of sites have been allocated for housing under draft Policies H2-H4. Collectively, these additional housing allocations are stated to have capacity to accommodate 7,996 dwellings. Those Sites were selected as an output of the SHELAA.

Strategic Housing and Economic Land Availability Assessment

3.5 The SHELAA (2025) forms part of the evidence base for the Central Lancashire Local Plan and represents the latest position in terms of housing land supply in Central Lancashire. It provides an audit of available land by identifying sites available for development across Central Lancashire. The role of the SHELAA is to provide information on the range of sites that are available to meet Central Lancashire’s housing and economic land requirements.

3.6 The methodology as to how the Central Lancashire housing land supply was arrived at is set out within the SHELAA and not repeated here. However, in summary, the Central Lancashire authorities undertook the following steps:

- Stage 1(a): Identifying sites with potential for development
- Stage 1(b): Initial site survey
- Stage 2: Assessing whether sites are likely to be developed
- Stage 3: Windfall assessment
- Stage 4: Assessment review
- Stage 5: Final evidence base

3.7 The final evidence base arrived at in the SHELAA is set out at Table 3.1 below. The table identifies the number of dwellings that could be delivered on all the SHELAA sites identified as suitable, available, and achievable.

Table 3.1: Potential SHELAA Supply

Central Lancashire Authority	Potential SHELAA Housing Supply over Plan Period (dwellings)				Total
	Pre-adoption 2023-2026	0-5 years from adoption 2016-2031	5-10 years from adoption 2031-2036	10-15 years from adoption 2036-2041	
Chorley	219	1,404	1,702	118	3,443
Preston	168	1,173	2,102	2,106	5,549
South Ribble	25	1,888	1,730	805	4,448
Total	412	4,465	5,534	3,029	13,440

3.8 In addition to SHELAA sites, other sites with extant planning permission (existing commitments) for housing and a windfall allowance will contribute to meeting Central Lancashire’s housing requirement.

Existing Commitments

3.9 Sites within the ‘existing commitments’ component of the Central Lancashire housing land supply were identified by the three Central Lancashire authorities individually in the following documents:

- Chorley Council – Housing Land Monitoring Report (May 2024)
- Preston City Council – Housing Land Position (March 2024)
- South Ribble Borough Council – Housing Land Position Statement (April 2024)

Windfall

3.10 The Central Lancashire housing land supply incorporates an allowance for windfall development. The windfall allowance figure has been arrived at based on a historic delivery of windfall development. A windfall allowance will not be included for Preston as there is no evidence to demonstrate that they will provide a reliable source of supply.

Authority	Windfall Allowance
Chorley Council	1,489
Preston City Council	0
South Ribble Borough Council	1,650
Total	3,139

Housing and Employment Allocations: Site Selection Process

3.11 The Housing and Employment Allocations: Site Selection Process (2025) document states that the Central Lancashire authorities have drawn on information in the SHELAA to identify a sufficient supply and mix of specific deliverable and developable sites to meet the area’s identified housing need.

3.12 The Site Selection Process sets out that allocations were decided taking into account the findings of the SHELAA Stage 2 assessment of sites and the proposed spatial strategy and settlement hierarchy. The Local Plan considers that sufficient sites have been allocated to meet the identified housing needs after taking account of the available supply from existing commitments and an allowance for windfall. It was therefore deemed that because Central Lancashire’s housing needs could be met on non-Green Belt sites (and in the case of Chorley by re-distributing requirement elsewhere), that there were no exceptional circumstances to justify a Green Belt review.

3.13 In summary, all the sites identified in the SHELAA as suitable, available, and achievable were subsequently allocated in the emerging Local Plan. Sites allocated in adopted development plan or with planning permission (including outline and permission in principle) were considered suitable for development unless circumstances have changed, and achievable within five years unless there was clear evidence that completions cannot begin within that time period.

Critique of Central Lancashire’s SHELAA Methodology and Site Selection Process

3.14 The site selection process is a fundamental aspect of the Local Plan, determining where development will take place and shaping the future of communities. However, we have

significant concerns regarding the robustness of this process in Central Lancashire. We set out our concerns with the SHELAA and site selection process below.

Site selection

- 3.15 At paragraph 4.1 of the Site Selection paper, the Council states that allocations were decided upon taking into account the findings of the SHELAA assessment of sites and the proposed spatial strategy and settlement hierarchy.
- 3.16 We contend, however, that allocations were determined on the basis of what sites were available (supply), rather than any overarching strategy. The SHELAA identifies sites with the capacity to deliver 13,440 dwellings. This figure is exactly the number of homes that have been allocated in the Local Plan.
- 3.17 In many respects, no site selection exercise has taken place. The draft allocations have been chosen purely on the basis that sites are available, with no account taken of whether they would contribute to delivering the right level of growth for a particular settlement or in accordance with a proportional distribution.
- 3.18 We therefore have real concerns with how draft allocation sites have been chosen and the soundness of the proposed spatial strategy generally.

Deliverable Sites

- 3.19 The NPPF is clear that for sites to be considered deliverable, and therefore within a Council's five year housing land supply, development should be achievable with a realistic prospect of construction taking place within five years. The NPPF goes on to give examples of what would and wouldn't be considered realistic prospects of delivery, and in so doing puts a significant emphasis on the need for detailed planning permission. Sites with outline planning permission or allocated in a development plan should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 3.20 We have concerns that the Central Lancashire housing supply does not take sufficient heed of the NPPF definition of deliverable. For example, all draft allocations in South Ribble are anticipated by the Council to be delivered within the first five years of the plan, despite the vast majority of them not benefiting from detailed planning permission or accompanied by evidence that a developer is on board and preparing a detailed planning application.
- 3.21 This is a concern for if the anticipated delivery rates of draft allocations were considered strictly

in line with the NPPF definition of deliverability then the Central Lancashire housing supply would look markedly different, for a significant uplift in housing sites would be required to take account for draft allocations which in all likelihood would begin to come forward in year 6 of the plan at the earliest.

Build out rates

- 3.22 We have concerns of the proposed build out rates stated in the SHELAA proformas and in Councils housing position statement reports. It is not clear what the purported build out rates are based on, whether a consistent approach has been taken, or whether land promoters or developers have been involved in the drafting anticipated delivery rates for every site.

- 3.23 The accuracy of build out rates is important because an over optimistic anticipated delivery on certain sites could result in an insufficient number of homes being built in the context of meeting an identified need. Our concerns on this point are illustrated acutely with proposed Strategic Site SS6 A Pickering’s Farm. South Ribble contends that development will start to come forward at the Site in 2029, with the site complete by 2037-38. This trajectory requires an ambitious delivery rate of 150 units per annum (dpa). In our experience (as expanded upon in Section 4), three outlets operating concurrently can achieve an approximate delivery rate of 100 dpa. Without evidence to the contrary, it is not considered likely that housing will come forward at the site at the rate envisioned by the Council.

- 3.24 As another example, different parcels of Strategic Site SS3 North West Preston / Bartle are anticipated to come forward at different times, with 2,370 units earmarked for 6+ years, and 4 smaller sites earmarked for 10+ years. No explanation is provided as to how the Council have decided upon these delivery rates.

- 3.25 As there is a lack of evidence and transparency with regards to build out rates, we have concerns that the stated anticipated delivery of sites is not robust.

Lack of Evidence

- 3.26 Although the Council has released a number of reports and documents to justify the content of its Local Plan, there is a distinct lack of meaningful detail and information in relation to justifying the developability of a large proportion of the claimed supply.

- 3.27 A major concern we have with the Council's site selection process is the inclusion of sites for allocation based on what appears to be limited evidence, particularly in relation to whether environmental constraints can be overcome and whether sites are being progressed by a

delivery vehicle or developer.

- 3.28 The SHELAA proformas include a wide range of sub-headings and information but present limited information. It may well be that the SHELAA proformas are a summary of a wider portfolio of evidence on each allocation site. However, as far as we can tell, this does not appear to be the case.
- 3.29 For example, Babylon Lane, Adlington (draft allocation HS2.5) is subject to flooding constraints, with appeal APP/D2320/W/23/3329702 dismissed on flood risk grounds in May 2024. There is no evidence provided to demonstrate that flooding constraints at this site can be overcome.
- 3.30 The absence of information on environmental constraints is particularly significant given that historic site allocations have been carried forward into the new Local Plan. Many of these sites have long been allocated for development but have yet to be brought forward. The Council provides little evidence to show that it fully understands why these sites have remained undeveloped or what has changed over the years to now make them feasible. For example, Cowling Farm has been allocated for development since 2003, yet it has well documented topographical and groundworks challenges. No evidence has been provided to demonstrate that these constraints can now be overcome, raising concerns about the site's developability.
- 3.31 There is also a concerning lack of evidence and transparency regarding the entity that has promoted the site for development. Understanding who is behind a site's promotion is crucial, as it provides credibility to the assumptions made about the site's deliverability and developability. Greater transparency in this regard would enhance confidence in the Central Lancashire housing supply, ensuring that allocations are based on realistic expectations rather than speculative interest.

4 Methodology

- 4.1 This section sets out our approach to assessing the Central Lancashire housing land supply. The proposed methodology has been informed by the underlying purpose of this assessment report, which is to critique the Central Lancashire’s stated housing land supply and to highlight areas of concern. It is not the purpose of this assessment to provide an alternative land supply position or alternative trajectory.
- 4.2 The output of this assessment is to arrive at a minimum number of houses which the Central Lancashire housing supply and five-year housing land position should be reduced by. To achieve this, we have focused on the main components of the housing land supply, namely strategic sites, proposed allocations, existing commitments over 50 units, and the proposed windfall allowance.
- 4.3 The most effective means of assessing the accuracy of the stated housing land supply has been deemed to be by assessing the proposed Local Plan allocations and the latest housing land position statements produced by the individual authorities (as set out in section 3) and drawing conclusions.

Deliverable Sites

- 4.4 Deliverable sites are those with a realistic prospect of being constructed within five years. In accordance with the definition of ‘deliverable’ as set out at Annex 2: Glossary of the NPPF, only sites with detailed planning permission (Full or Reserved Matters) have been deemed deliverable.
- 4.5 Due to well documented delays in the planning system, an outline planning permission is not considered clear evidence that the housing completion will begin on site within five years. Similarly, due to the long-standing nature of existing allocations, an allocation alone, without information to demonstrate that constraints can be overcome, was not considered clear evidence that housing completions will begin on site within five years.

Existing Commitments

- 4.6 Each site in the housing land supply position statements produced by the three individual Central Lancashire authorities which has been listed as having a planning permission has been assessed. The exception to this is sites of under 50 homes. Those sites have automatically

been accepted as deliverable for the purposes of this assessment.

- 4.7 Of the remaining sites of 50 and over, all sites have been assessed in terms of if they are available, suitable, and deliverable. In terms of those with full planning permission, the presumption has been that they are deliverable and/or developable, unless there is clear evidence to the contrary. This is as per guidance in the NPPF.
- 4.8 In terms of those with an outline application, these have again been assessed, but without the presumption that they are deliverable and/or developable.

Build-out Rates

- 4.9 The housing land supply position documents produced by the individual authorities, and the appendices which support the SHELAA, provides the most up to date position on the rates of planned housing development and lead-in times. However, no evidence has been provided to explain how these rates have been derived. For consistency, in assessing when sites may come forward for development, we have applied set build-out rates based on the capacity of individual sites, informed by our experience of build-out rates and latest market feedback from the Consortium.
- 4.10 The accuracy of build-out rates is significant in relation to whether sites are 'developable'. To be considered developable, sites should have a reasonable prospect of being constructed at the point envisaged. It follows that where build-out rates have been over stated, there is not a realistic prospect of being constructed at the envisaged point.
- 4.11 Whilst housebuilders aim to deliver development on site as quickly as possible, the annual delivery rate will depend on several factors, such as local market conditions, general economic trends, proximity to competing developments, housing market demand, the type and quality of units, and the overall scale of the project.
- 4.12 Although larger sites can support multiple outlets, this is not always the case and will depend on the size, layout, and housing mix of the development. Market absorption rates mean that the number of outlets does not directly equate to a proportional increase in homes delivered.
- 4.13 In our experience, sites with a capacity of fewer than 100 units, a delivery rate of approximately 25 dpa is more common, as they are often developed by smaller housebuilders. Sites of less than 250 units are typically built out by a single housebuilder using one outlet. As such, a reasonable average annual delivery rate for these sites is around 40 dwellings per annum (dpa).

- 4.14 For sites with a capacity of between 250 and 500 units, a second developer (or a national housebuilder using a second outlet) often operates alongside the first. This leads to an increase in annual delivery rates, though not in direct proportion to the number of developers or outlets. Based on current market conditions, sites with two outlets typically deliver around 65 dpa.

- 4.15 On large-scale sites exceeding 500 units, multiple house builders or outlets may operate simultaneously. Again, this does not result in a directly proportional increase in delivery, but in our experience, three outlets operating concurrently can achieve an approximate delivery rate of 100 dpa.

Viability

- 4.16 Where there is evidence of viability pressures we have removed sites from the housing land supply. For example, an application has been submitted at draft allocation HS4.20 (06/2024/1159) seeking to modify the ‘*Section 106 agreement to remove the requirement for a viability review mechanism attached to outline permission 06/2022/1084*’. The covering letter supporting the application explains the rationale behind this application as ‘*concerns over viability due to rising build costs, high interest rates and ongoing regulatory changes. Although the site has since been placed back on the market, this has illustrated the difficulties facing schemes for residential development.*’ Consequently, draft allocation HS4.20 has been removed from the housing supply.

- 4.17 Stantec understands that Roger Hannah is preparing a viability report looking at the viability of sites in Central Lancashire. This housing supply assessment report should be read in conjunction with Roger Hannah’s viability report.

Five year housing land supply

- 4.18 In assessing whether the Local Plan can demonstrate a 5-year housing land supply at the point of adoption, we have used the trajectories provided at Appendix 3 of the emerging Local Plan as the starting point.

- 4.19 We have subtracted the sites we have removed from the five year supply from the total projected completions for years 1-5 of the plan to arrive at a realistic five year housing land supply figure.

- 4.20 We have then subtracted the five year housing requirement figure for each authority from the realistic five year housing land supply figure to determine whether individual authorities and the Central Lancashire area as a whole has a five year housing land supply. Our five year housing land supply calculation looks solely at the land supply and does not include for (or exclude) the

application of a buffer.

5 Chorley Council Housing Land Supply Assessment

- 5.1 This section provides an assessment of Chorley Council's housing land supply. The assessment has been undertaken based on the components of the Central Lancashire housing land supply, as summarised at Appendix 3 of the draft Local Plan, with each component assessed in turn below, utilising the methodologies set out at Section 4 of this report.
- 5.2 We have undertaken a detailed analysis of draft Strategic Sites, all proposed allocations, existing commitments over 50 units, and the proposed windfall allowance. As set out at Section 4 of this report, in assessing each component of the housing supply, we have assessed whether sites are deliverable and / or developable as defined by the NPPF, and appraised anticipated delivery in the context of realistic build out rates.
- 5.3 For completeness, our detailed analysis on draft Strategic Sites, all proposed allocations, existing commitments over 50 units is provided at Appendix A and B in the form of site proformas and build out rate analysis.

Projected completions on allocated sites

5.4 Table 5.1 below sets out the outcome of our assessment of allocated sites Chorley.

Table 5.1: Assessment of allocated sites in Chorley

Stated capacity of Chorley allocation	Reduction based on critical analysis
3,443	561

5.5 Our assessment reduces the number homes which could realistically be delivered on allocated sites in Chorley over the plan period by 561 dwellings. An assessment of all draft allocations is provided at Appendix A and B. However, for completeness, a list of the proposed allocations removed from the housing supply in their entirety are at set out at Table 5.2 below.

Table 5.2: Proposed allocations removed from the housing supply

Site	Draft Allocation Reference	Stated Capacity
Cowling Farm, Chorley	EC5.2	242
Cabbage Hall Fields	HS2.9	17

Land adjacent to Northgate Drive	EC5.4	10
Mountain Road, Coppull	HS2.19	12
Babylon Lane, Adlington	HS2.5	40
Land at Drinkwater Farm, Windsor Drive	HS2.7	12
Crow Nest Cottage, Mawdesley	HS2.28	8
Orchard Heys Farm, Coppull	HS2.21	10
Blackburn Road, Wheelton	HS2.31	6
West of M61 - Land adjacent to Delph Way	HS2.36	102
Botany Bay / Great Knowley Blackburn Road	EC5.5	100
Land at the rear of 62-66 Moor Road, Croston	HS2.22	2

5.6 Whilst an assessment of each site is provided at Appendix A and B, a summary of the rationale behind the removal of four largest allocations is provided below.

- Cowling Farm, Chorley** – Cowling Farm comprises mixed-use site EC5.2, which is allocated for 242 dwellings. This site was originally allocated as an employment site as far back as 2003, before being allocated for 158 dwellings in the Chorley Local Plan (2015) but has not come forward for development. A section of the site was also earmarked for gypsy and traveller accommodation in 2015. Homes England acquired 6ha in 2017 with the intention of delivering the residential element of the 2015 allocation. In the site's SHELAA site proforma, the Council state that the site is owned by Chorley Council and Homes England who are working together to bring the site forward, with design work and feasibility assessments undertaken. However, information on what technical work has been undertaken has not been provided, no information is provided as to why the site has not come forward for development or how prevailing constraints have been overcome.

A report on Cowling Farm was presented to Chorley Council's Executive Cabinet in November 2019. This report provides information on the technical work that has been undertaken at the site. It states that there is undulating topography across the site including a central point rising over 10m above the level of Cowling Road and a lower valley which runs parallel to the M61 creating significant slopes across the northern section of the site. Consequently, this will require a significant level of groundworks to provide an appropriate development platform. Preliminary assessments confirm that there will be a need to reduce the ground on the Homes England land and raise the ground along the eastern boundary adjacent to the M61 motorway. The groundworks required on the Chorley land to create a development platform is significant.

It is not clear if the technical work and feasibility work referenced in the SHELAA is the same as those mentioned in the 2019 report, or whether additional work has been

undertaken.

The long-standing nature of the site's allocation, and the protracted technical work which goes back to at least before 2019, creates uncertainty. There is also no evidence to suggest that the site remains viable in a post-Covid world and in a Biodiversity Net Gain regime. **Accordingly, until evidence is provided to the contrary, the site has been considered undeliverable and removed from the Council's housing supply.**

- **West M61 – Land adjacent to Delph Way, Whittle-le-Woods** – Land at Delph Way has a draft allocation for 102 dwellings under reference HS2.36. In the SHELAA site assessment proforma, concerns are raised with respect contamination from the adjacent landfill migrated via groundwater. No evidence is available to demonstrate that contamination concerns can be overcome and to provide certainty that housing at the site is deliverable. Moreover, the SHELAA assessment raises the prospect of the number of homes which can be delivered at the site being reduced. **For these reasons, this allocation was removed from the Council's housing supply.**
- **Botany Bay / Great Knowley Blackburn Road** – The Botany Bay / Great Knowley site has a draft allocation for mixed use development under reference EC5.5. The site is earmarked for 100 dwellings. However, the site constitutes a legacy allocation, having been allocated from housing under Local Plan Policy HS1.8. It is not clear why the site has not come forward for development, though in the same terms it is not clear as to what has changed so as to now make the site attractive. The outline planning application was permitted in 2019. The absence of a detailed permission suggests that either the site not attractive to the market, or there are technical constraints which cannot be overcome. The northern section of the site is under construction for employment use. **For these reasons, the site has been removed from the Council's housing supply**

Existing Commitments

- 5.7 As set out at Section 4, sites with planning permission for 50+ dwellings have been assessed to ascertain their likelihood of delivery. In total, 6 sites with the collective capacity to deliver 797 dwellings were assessed. All 6 sites were retained in the Central Lancashire housing supply. The only amendments made were to the housing trajectory, with a greater number of dwellings anticipated to come forward during the pre-adoption period at Pear Tree Lane (site ref. 3541) and DXC Technology, Euxton Lane (site ref. 3772).

Windfall

- 5.8 Since 2010, Chorley has seen a mean average of windfall development of 140 units. Of these, a mean average of 63 units has come from small windfall sites, while large windfall sites have contributed a mean average of 77 units per year.
- 5.9 The Council state that windfall development has made a steady and important contribution to housing supply in the Borough and shows no sign of reducing. As such, the Council proposes an annual small site windfall allowance of 63 dwellings, and 71 dwellings per annum for large windfall sites.
- 5.10 For years 4 to 10 of the plan period following anticipated adoption, the large windfall allowance has been reduced by 50% to account for the Council's identification of development opportunities through four call-for-sites exercises and the broader plan-making process. However, in the final five years of the plan period, the full large windfall allowance has been reinstated, based on the assumption that new large windfall sites will emerge.

Critique of Windfall Allowance

- 5.11 Chorley Council's assumptions regarding windfall site delivery appear reasonable with respect to small site allowances. However, we have concerns over the assumptions for large windfall sites. Firstly, the plan appears to treat past windfall delivery as a guarantee of future supply rather than recognising the inherent uncertainties associated with windfall sites. There is no guarantee that market conditions, land availability, or planning policy constraints will allow large windfall sites to come forward at the assumed rate.
- 5.12 Secondly, Chorley also fails to consider the impact that an up-to-date Local Plan will have on windfall delivery. When housing policies of a development plan are out of date or historic, it is reasonable to expect a higher delivery windfall than there would be ordinarily. With an up-to-date plan in place, one should expect fewer houses delivered by windfall development, particularly on large windfall sites, for large sites suitable for housing would be allocated. This is evident in the reporting of windfall delivery in the SHELAA where windfall development on large sites is considerably lower in the first 5 years of the plan period, averaging just 16 units.
- 5.13 Furthermore, local planning authorities are obliged to review their housing requirements every 5 years and update their housing policies accordingly to ensure they reflect changes affecting the area and any updated policy (NPPF paragraph 33). The requirement to review housing policies every five years should put downward pressure on large scale windfall development as such suitable sites should be incorporated into the Council's housing supply as allocations.

5.14 Accordingly, it is our view that there should be no allowance for large scale windfall sites. This would reduce windfall allowance in Chorley over plan period by 607 units.

Five Year Housing Land Supply

5.15 Table 5.3 below summarises our assessment of whether Chorley has a five year housing land supply at the point of the Local Plan’s adoption.

Table 5.3: Chorley 5 year housing land supply at the point of adoption assessment

5 year requirement	Stated 5 yhls	Stantec 5 yhls reduction	Housing supply outcome
1,670	2,421	975	-224

5.16 Table 5.3 sets out how Chorley is overestimating the number of sites which could realistically be delivered within the first five years of the plan, once proposed allocations and existing commitments (over 50-units) which are unlikely to come forward in this first 5 years of the plan have been discounted.

5.17 The majority of the reduction of 975 units stems from proposed allocations which we have discounted from the first 5 years of the plan, as set out at Table 5.4.

Table 5.4: Assessment of trajectory of allocated sites in Chorley

Pre-adoption and Years 1-5	
Stated trajectory of Chorley allocations in years 1-5	1,689
Stantec revised Chorley allocation trajectory in years 1-5	764

5.18 A list of proposed allocations removed from the five-year housing land supply is provided at Table 5.5 below.

Table 5.5: Proposed allocations removed from the five-year housing land supply

Site	Draft Allocation Reference	Stated Capacity
North of Bonds Lane, Adlington	HS2.1	92
Land off Westhoughton Road, Adlington	HS2.3	17
Land south of South Road, Bretherton	HS2.6	26
Woodlands, Southport Road, Chorley	EC5.6	97
East of Tincklers Lane	HS2.23	15
Pear Tree Lane	HS2.25	100
Southern Commercial, Buckshaw Village	EC5.1	41
Land off Blackburn Road	HC2.33	40

Rear of New Street, Mawdesley	HS2.30	7
West of M61 - Town Lane	HS2.35	289
Brookfields, Chancery Road	HS2.15	16
Land at Carrington Road, Adlington	HS2.4	24
Land at Millbrook close / Victoria Street, Wheelton	HS2.32	9
Land south of west The Green and Langton Brow	EC5.7	32

6 Preston City Council Housing Land Supply Assessment

- 6.1 This section provides an assessment of Preston City Council’s housing land supply. The assessment has been undertaken based on the components of the Central Lancashire housing land supply, as summarised at Appendix 3 of the draft Local Plan, with each component assessed in turn below, utilising the methodologies set out at Section 4 of this report.
- 6.2 We have undertaken a detailed analysis of draft Strategic Sites, all proposed allocations, existing commitments over 50 units, and the proposed windfall allowance. As set out at Section 4 of this report, in assessing each component of the housing supply, we have assessed whether sites are deliverable and / or developable as defined by the NPPF, and appraised anticipated delivery rates in the context of realistic build out rates.
- 6.3 For completeness, our detailed analysis on draft Strategic Sites, all proposed allocations, existing commitments over 50 units is provided at Appendix A and B in the form of site proformas and an analysis of built out rates.

Projected completions on allocated sites

6.4 Table 6.1 below sets out the outcome of our assessment of allocated sites in Preston.

Table 6.1: Assessment of allocated sites in Preston

Stated capacity of Preston allocations	Reduction based on critical analysis
5,549	2,359

5.19 Our assessment reduces the number homes which could realistically be delivered on allocated sites in Preston over the plan period by 2,359 dwellings. An assessment of all draft allocations is provided at Appendix A and B. However, for completeness, a list of the proposed allocations removed from the housing supply at set out at Table 6.2 below.

Table 6.2: Proposed allocations removed from the housing supply

Site	Draft Allocation Reference	Stated Capacity
Former Horrocks Mill, off Queen Street, Preston	HS4.6	380
115 Church Street, Preston, PR1 3BS	HS4.8	57

37-41 Church Street	HS4.9	29
Former Tulketh High School, Tag Lane, Preston, PR2 3TX	HS4.11	30
North West Preston / Bartle*	SS3	2,767
Heather Moor, Cumeragh	HS4.13	41
Gorlands, Whittingham Road	HS4.14	32
Lancashire Fire and Rescue HQ, Garstand Road	HS4.15	40
Brethens Meeting Room, Egerton Road	HS4.16	12
Former St Joseph's Orphanage, Theatre Street, PR1 8BS	HS4.18	67
Avenham Street Car Park	HS4.19	294
Grimshaw Street / Queen Street / Manchester Road	HS4.20	146
Former Byron Hotel, Grimshaw Street	HS4.21	28
Mount Street / Garden Street, Preston, PR1 8BT	HS4.22	47
Perry's Car Showroom, Perry's Motor Village	HS4.23	55
25 & 27 Whittingham Lane and land to rear of 25-31 Whittingham Lane	HS4.24	8
Former Gasworks, Ribbleton Lane, Preston, PR1 5ST	HS2.26	59
50 Lancaster Road	HS4.27	5
10 to 12 Lancaster Road	HS4.28	5
Corner of Manchester Road and Church Street, Preston	HS4.29	167

**Preston is clear that a number of sites are not expected to be completed in full within the plan period. Of its total land supply of 7,859 units, 2,310 units are expected to be completed beyond 2041. Of the 2,310 units, the Council have confirmed that 1,400 are at SS5, leaving a residual of 910 units. Based on our experience of delivery rates, we have assumed not all of SS3 will come forward beyond the plan period, and therefore it would be logical to account for the residual 910 units in SS3. We have retained 1,000 units of SS3 within the plan period.*

6.5 Whilst an assessment of each site is provided at Appendix A and B, a summary of the rationale behind the removal of largest allocations is provided below. The reduction of 2,359 dwellings from the realistic housing supply expected on allocated sites in Preston over the plan period is primarily due to two factors: the downward revision of deliverable units at SS3 to 1,000 and the removal of brownfield sites in the Preston City Centre from the housing supply:

- North West Preston / Bartle** – North West Preston / Bartle is allocated for 2,767 homes as a strategic site under SS3. Our assessment has reduced the number of dwellings which could realistically be delivered at SS3 in the plan period to 1,000 dwellings. Preston contends that development will start to come forward at the Site in 2029. In our experience, three outlets operating concurrently can achieve an approximate delivery rate of 100 dpa. Therefore, from years 6-15 of the plan period, 1,000 of the 2,767 allocated dwellings are anticipated to come forward.

- **Preston City Centre** – A number of allocations within Preston City Centre have been removed from Preston’s housing supply. These include Former Horricks Mill (draft allocation HS4.6), Avenham Street Car Park (draft allocation HS4.19), and Grimshaw Street / Queen Street (HS4.20). Collectively, these city centre sites are allocated for 820 units. However, there is considerable uncertainty surrounding these sites and therefore they have been removed from Preston’s housing supply.

Former Horrocks Mill has outline planning permission for 380 affordable units, including across buildings up to 10 storeys high. The scheme is being progressed by Onward who state on their website that they are moving forward with decisions on some of the finer details of the scheme before submitting a reserved matters application. News articles report that work is set to take place in 2025 but there is no realistic prospect of construction taking place in 2025.

The Avenham Street Car Park site secured full planning permission in December 2020. A condition requiring the submission of a demolition plan has been partly discharged (06/2023/1181), though it doesn’t appear that demolition has taken place. In addition, a NMA (06/2023/1167) was approved on the 3rd of November 2023 amending the trigger points at which pre-commencement conditions need to be discharged to allow for a start to be made on site. It does not appear that a start has been made on site and therefore the full permission may have expired.

The Grimshaw Street / Queen Street site has outline permission for 469 units but only allocated for 146 units. The 469 units are proposed across 2 x 16 storey buildings. An application has been submitted (06/2024/1159) and is pending determination for the ‘Modification of Section 106 agreement to remove the requirement for a viability review mechanism attached to outline permission 06/2022/1084’. The covering letter supporting the application states:

‘Since approval of the application, contracts had been exchanged between the applicant and a developer, however, as documented in the media last month the developer has since walked away from this development and another city centre scheme having concerns over viability due to rising build costs, high interest rates and ongoing regulatory changes. Although the site has since been placed back on the market, this has illustrated the difficulties facing schemes for residential development.’

It is acknowledged that Preston has produced a City Living Strategy to promote the delivery of brownfield sites in the city centre, but this strategy was produced pre-Covid and there is no evidence to suggest it has been updated to take account of changing

economic conditions, such as those documented at the Grimshaw Street / Queen Street site. Further, whilst a case could conceivably be made city centre sites individually, one needs to take account for them collectively as they are all in the same market area. For example, there is no evidence to suggest that the market can absorb the high-density developments simultaneously.

Therefore, for the reasons set out above, a number of allocations within Preston City Centre have been removed from Preston’s housing supply

Existing Commitments

6.6 As set out at Section 4, sites with planning permission for 50+ dwellings have been assessed to ascertain their likelihood of delivery. In total, 6 sites with planning permission were assessed. Of these 6 sites, 4no. have draft allocations and therefore were not assessed as existing commitments to avoid double counting. The other two existing commitments are: Keyfold Farm and 77 Tithebarn Street.

6.7 The 89 units at Keyfold Farm, and 146 units at the Ingol Golf and Squash Club, were retained in the five year housing land supply. However, the 124 units proposed at 77 Tithebarn Street were removed for there is no evidence that a detailed planning permission is being prepared and the outline planning permission expires in 2026. We also have concerns over the viability of Preston City Centre sites.

Windfall

6.8 The SHELAA confirms that a windfall allowance will not be included for Preston as there is no evidence to demonstrate that they will provide a reliable source.

Five Year Housing Land Supply

6.9 Table 6.3 below summarises our assessment of whether Preston has a five year housing land supply at the point of the Local Plan’s adoption.

Table 6.3: Preston 5 year housing land supply at the point of adoption assessment

5 year requirement	Stated 5 yhls	Stantec 5 yhls reduction	Housing supply outcome
2,600	2,650	232	-182

6.10 Table 6.3 sets out how Chorley is overestimating how many sites could realistically be delivered within the first five years of the plan, once proposed allocations and existing commitments (over

50-units) which are unlikely to come forward in this first 5 years of the plan have been discounted.

- 6.11 The reduction of 232 units is arrived at by discounting 168 units from proposed allocations and 64 units from existing commitments (over 50 units) from the Council's five year housing land supply.

7 South Ribble Borough Council Housing Land Supply Assessment

- 7.1 This section provides an assessment of South Ribble Borough Council's housing land supply. The assessment has been undertaken based on the components of the Central Lancashire housing land supply, as summarised at Appendix 3 of the draft Local Plan, with each component assessed in turn below, utilising the methodologies set out at Section 4 of this report.
- 7.2 We have undertaken a detailed analysis of draft Strategic Sites, all proposed allocations, existing commitments over 50 units, and the proposed windfall allowance. As set out at Section 4 of this report, in assessing each component of the housing supply, we have assessed whether sites are deliverable and / or developable as defined by the NPPF, and appraised anticipated delivery rates in the context of realistic build out rates.
- 7.3 For completeness, our detailed analysis on draft Strategic Sites, all proposed allocations, existing commitments over 50 units is provided at Appendix A and B in the form of site proformas and an alternative delivery trajectory.

Projected completions on allocated sites

7.4 Table 7.1 below sets out the outcome of our assessment of allocated sites in South Ribble Borough.

Table 7.1: Assessment of allocated sites in South Ribble

Stated capacity of South Ribble allocations (units)	Reduction based on critical analysis (units)
4,448	275

5.20 Our assessment reduces the number homes which could realistically be delivered on allocated sites in South Ribble over the plan period by 275 dwellings. An assessment of all draft allocations is provided at Appendix A and B. However, for completeness, a summary of the rationale behind the sites that have been removed from the housing supply are set out below.

- **Land off Browndge Road / Railway Sidings** (draft allocation HS3.12 / 60 units) – The Site is said to be deliverable between 2027-2029. Existing allocation 'T'. The site

has long been allocated which suggests there is no market interest in this site. The Site currently consists of dense mature tree coverage; there is no evidence to suggest the sites capacity takes into account the new BNG regime. No evidence of developer interest.

- **The Brambles Rest Home, Park Avenue** (draft allocation HS3.17 / 10 units) – The Site is currently in an alternative use as an active care home facility. The red line boundary for the Site in the SHELAA is tightly drawn around the care home facility. This may be an error for it is unclear how 10 dwellings could be accommodated on the SHELAA site. Would require the demolition of the care home and the relocation of elderly residents. No evidence provided to suggest the care home is no longer viable.
- **Pickering's Farm, Pentwortham** (SS6 A / 1,350 units) - Pickering's Farm is a strategic site allocation under Policy SS6. The northern section of the allocation is known as SS6 A and allocated for 1,350. Our assessment has reduced the number of dwellings which could realistically be delivered at SS6 A in the plan period by 150 dwellings. South Ribble contend that development will start to come forward at the Site in 2029 and be delivered by 2037-38. This trajectory requires an ambitious delivery rate of 150 units per annum. We understand that 48 dwellings are set to come forward in 2028/29, with 96 units per year thereafter. Accordingly, the allocation is retained in the housing supply, but 150 dwellings are expected to come forward beyond the plan period.
- **Kelley Lane** (draft allocation HS3.10 / 60 units) – This site has been retained but its capacity has been reduced to 30 units due to highways and ecological constraints.
- **South of Factory Lane and east of the West Coast Main Line** (draft allocation HS3.11 / 60 units) – This site has been retained but its capacity has been reduced to 30 units. The Site looks to be a logical infill site for housing. However, considerable environmental constraints means that achieving 60 units on site would be challenging.

Existing Commitments

- 7.5 As set out at Section 4, sites with planning permission for 50+ dwellings have been assessed to ascertain their likelihood of delivery. In total, 6 sites with the collective capacity to deliver 1,678 dwellings were assessed. All 6 sites were retained in the Central Lancashire housing supply.

Windfall

- 7.6 The SHELAA sets out that windfall development in South Ribble has varied considerably from -99 to 227. South Ribble have therefore chosen to use a median average to calculate windfall performance since 2010, which gives an annual figure of 140 units. The Council state that there is no evidence to suggest that windfall developments will not continue to come forward and propose to use the median figure of 140 as a windfall allowance in the emerging Local Plan.
- 7.7 Breaking this allowance unit down by small and large windfall sites, a small site windfall allowance of 83 units a year is proposed from year 5 of the plan period, and the large windfall allowance is applied from year 7 of the plan period (year 5 from the base date of the supply calculation). The large windfall allowance is discounted by 50% until the last 5 years of the plan period when the full windfall allowance is applied.

Critique of Windfall Allowance

- 7.8 South Ribble's Local Plan was adopted in 2015. In the 5 years following the plan's adoption, windfall development averaged 135 units per annum, including 56 units per annum on large windfall sites.
- 7.9 Our concerns with the large windfall allowance for South Ribble are the same as those for Chorley:
- There is no guarantee that market conditions, land availability, or planning policy constraints will allow large windfall sites to come forward at the assumed historic rate.
 - South Ribble's windfall allowance fails to consider the impact that an up-to-date Local Plan will have on windfall delivery. With an up-to-date plan in place, one should expect fewer houses delivered by windfall development, particularly on large windfall sites, for large sites suitable for housing would be allocated.
 - Local planning authorities are obliged to review their housing requirements every 5 years and update their housing policies accordingly to ensure they reflect changes affecting the area and any updated policy (NPPF paragraph 33). The requirement to review housing policies every five years should put downward pressure on large scale windfall development as such suitable sites should be incorporated into the Council's housing supply as allocations.
- 7.10 Accordingly, it is our view that there should be no allowance for large scale windfall sites. This would reduce windfall allowance in South Ribble over plan period by 488 units.

Five Year Housing Land Supply

7.11 Table 7.3 below summarises our assessment of whether South Ribble has a five year housing land supply at the point of the Local Plan’s adoption.

Table 7.3: South Ribble 5 year housing land supply at the point of adoption assessment

5 year requirement	Stated 5 yhls	Stantec 5 yhls reduction	Housing supply outcome
2,300	3,473	1,321	-148

7.12 Table 6.3 sets out how South Ribble is overestimating how many sites could realistically be delivered within the first five years of the plan. A large number of proposed allocations in South Ribble are anticipated by the Council to come forward in the first five years of the plan, despite no detailed permission in place and / or evidence of developer interest. As such, all proposed allocations which we have retained in the housing supply have been removed from the 5-year housing land supply.

8 Summary and Conclusions

- 8.1 Stantec, on behalf of the Consortium, has undertaken a critical analysis of Central Lancashire housing land supply as set out in the Regulation 19 Local Plan consultation. The purpose of the assessment is to ascertain whether the emerging Local Plan has identified a sufficient supply of housing land to meet Central Lancashire’s housing needs over the emerging plan period of 2023-2041, and whether the Local Plan can demonstrate a 5-year housing land supply (plus buffer) at the point of adoption.
- 8.2 The Regulation 19 consultation contains a range of evidence base documents which have informed the preparation of the draft Local Plan, including the SHELAA. The SHELAA sets out that the Central Lancashire housing supply is sufficient to accommodate 13,440 dwellings. All sites identified within SHELAA as suitable, available, and achievable have been allocated in the emerging Local Plan.
- 8.3 A detailed analysis of Central Lancashire’s housing land supply has been undertaken, including draft Strategic Sites, all proposed allocations, existing commitments over 50 units, and the proposed windfall allowance. In assessing each component of the housing supply, we have assessed whether sites are deliverable and / or developable as defined by the NPPF, and appraised anticipated delivery in the context of realistic build out rates.

Assessment of Proposed Allocations

- 8.4 Table 8.1 below sets out the outcome of our assessment of draft allocated sites in Central Lancashire by authority.

Table 8.1: Assessment of proposed allocations

Authority	Stated Supply of Proposed Allocations	Reduction based on critical analysis
Chorley Council	3,443	-561
Peston City Council	5,549	-2,359
South Ribble Borough Council	4,448	-275
Total	13,440	-3,195

- 8.5 The reduction of Central Lancashire’s housing land supply from proposed allocations stems in large part to the downward revision of deliverable units at Strategic Site SS3 to 1,000 and the removal of brownfield sites in the Preston City Centre from the housing supply.

Assessment of Existing Commitments

8.6 Table 8.2 below sets out the outcome of our assessment of existing commitments over 50 units by authority.

Table 8.2: Assessment of existing commitments over 50 units

Authority	Reduction based on critical analysis
Chorley Council	0
Peston City Council	-124
South Ribble Borough Council	0
Total	-124

8.7 With respect to existing commitments, sites with planning permission for 50+ dwellings have been assessed to ascertain their likelihood of delivery. Our critical analysis determines that 124 units proposed at 77 Tithebarn Street should be removed from the Central Lancashire housing land supply.

Assessment of Windfall Development Allowance

8.8 Table 8.3 below sets out the outcome of our assessment with respect to windfall development over the plan period in Central Lancashire by authority.

Table 8.3: Assessment of Windfall Development

Authority	Stated Supply of Windfall development	Reduced based on critical analysis
Chorley Council	1,489	-607
Peston City Council	0	N/a
South Ribble Borough Council	1,650	-488
Total	3,139	-1,095

8.9 It is the Consortium’s view that the plan treats past windfall delivery as a guarantee of future supply rather than recognising the inherent uncertainties associated with windfall sites and fails to consider the impact that an up-to-date Local Plan will have on windfall delivery. The requirement for local authorities to review Local Plans every five years to ensure housing policies are up to date means that there should not be a scenario where large scale windfall sites makes up a meaningful portion of a housing supply for suitable sites which could become large site windfalls should already be factored into the housing supply. Accordingly, we reduce the windfall allowance for Chorley by 607 and in South Ribble by 488.

Housing Land Supply Assessment Summary

8.10 Table 8.4 provides a summary of our assessments of the different components of Central Lancashire's housing land supply by local authority and across Central Lancashire generally.

Table 8.4: Housing Land Supply Assessment Summary

	Housing requirement	Stated housing supply	Stantec supply reduction	Housing supply outcome over plan period
Chorley	6,012	6,421	-1,168	-759
Preston	9,360	10,156	-2,483	-1,687
South Ribble	8,280	9,002	-763	-41
Central Lancashire Total	23,652	25,579	-4,414	-2,487

8.11 Table 8.4 sets out that the Central Lancashire authorities have identified insufficient sites to meet the region's housing requirement as outlined in the emerging Local Plan.

Five Year Housing Land Supply Assessment

8.12 Table 8.5 below provides a summary of our five year housing land supply assessment. As set out at Section 4, we do not aim to provide an alternative five year housing land supply; rather, our assessment seeks to state whether or not a five year housing land supply can be demonstrated.

Table 8.5: Five Year Housing Land Supply Assessment

	5 yhls requirement	Stated 5 yhls	Stantec Reduction	5 yhls Outcome
Chorley	1,670	2,421	975	-224
Preston	2600	2,650	232	-182
South Ribble	2,300	3,473	1,321	-148
Central Lancashire Total	6,570	8,544	2,528	-554

8.13 Table 8.5 demonstrates that none of the three Central Lancashire authorities will be able to demonstrate a five year housing land supply at the point of the emerging Local Plan adoption.

8.14 The reduction of the number of homes which could realistically come forward in the first five years of the plan is due to a large number of proposed allocations anticipated by the Councils to come forward in the first five years of the plan, despite no clear evidence that housing

completions will begin on site within five years, such as detailed permission in place and / or evidence of developer interest. This is particularly apparent in South Ribble, where all proposed allocations which we have retained in the housing supply have been removed from the 5-year housing land supply.

Closing Remarks

- 8.15 The Consortium is of the opinion, having reviewed the evidence published to support the emerging Local Plan, that the claimed housing land supply in the Plan is exaggerated and overestimates the quantum of development that it can accommodate over the plan period. Whilst we remain keen to see a development plan adopted it must only be adopted if it is sound. The Consortium is concerned with the approach taken to assessing the housing land supply (including the method by which sites were selected) and the conclusions drawn as to the level of housing that it will deliver. We consider that the Plan as currently prepared is flawed and if progressed to examination in its current form should be found unsound.

Appendix A Housing Land Supply Critique Table

Appendix B Site Proforma Assessments

Chorley Housing Land Supply Proformas

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
Proposed Allocations							
EC5.3 (SHELAA ref. 19C100, 19C119)	Land at Bagganley Lane, Chorley	Chorley North & Astley	200	Not permissioned	N/A	N/A	<p>Site is said to be deliverable for mixed use development between 2031 and 2036.</p> <p>The Site is at risk of surface water and fluvial flooding (Flood Zone 2) around the southern half of the Site. Residential development is not compatible with this and would be required to pass the flood risk sequential and exception test.</p> <p>There is potential for contamination as a result of the adjacent infilled pond. Priority Habitats are found on the Site which will also need to be mitigated and avoided.</p> <p>The above considerations lend the development of the Site towards other less sensitive uses rather than residential. It is not considered possible for residential development to positively come forward here due to the constraints listed above, in the absence of any evidence to demonstrate this.</p> <p>Conclusion: Retain</p>
HS2.1 (SHELAA ref. 19C227x, 19C038, 19C063)	North of Bonds Lane, Adlington	Adlington and Anderton	92	Not permissioned	N/A	N/A	<p>Area of Grade 3 agricultural land (BMV) bound by a canal to the east and residential properties to the south. The emerging Local Plan suggests this to be deliverable between 2029-2034.</p> <p>There are several constraints which could hinder development coming forward.</p> <p>Large areas of surface water flood risk across the centre and southeast of the Site. Risk of reservoir flooding. A flood risk sequential test would therefore be required to demonstrate how the proposal will adhere to the tests presented within the NPPF.</p> <p>There is no clear feasible access arrangement options that could facilitate a development of this size. The road to the north is narrow and utilises a Grade II listed bridge, while the track to the south is tightly bound by existing properties. The SHELAA also notes that public transport improvements will be required.</p> <p>Policy HS6 of the draft Local Plan advises a housing density of 40dph in a settlement of this size. Taking into account the above constraints (notably flood risk) it is not clear how 92 dwellings can viably and realistically come forward.</p> <p>Conclusion: Retain but remove from five year housing supply</p>

HS2.2 (SHLAA ref. 19C228x, 19C029)	Land South East Belmont Road/Abbey Grove, Adlington	Adlington and Anderton	137	Planning permission approved at committee subject to S106	22/00631/FUL MAJ	Full permission	<p>Site said to be deliverable between 2031-2034.</p> <p>There are numerous heritage, flood risk and environmental constraints that have been resolved through the planning application process.</p> <p>Planning permission was obtained in December 2023, and no evidence of condition discharge is present on the public access system.</p> <p>Conclusion: Retain 137 units</p>
HS2.3 (SHLAA ref. 19C230x, 19C043)	Land off Westthought on Road, Adlington	Adlington and Anderton	17	Not permissioned	N/A	N/A	<p>Site is said to be deliverable between 2028-2029. The Site is being promoted by the landowner so is said to be available.</p> <p>Risk of surface water flooding within the north of the Site. A flood risk sequential test would therefore be required to demonstrate how the proposal will adhere to the tests presented within the NPPF.</p> <p>Access is currently obtained via a private street, so would require improvement and there is a landfill within the vicinity (250m).</p> <p>No evidence of promotion by the landowner. Not achievable in the short term.</p> <p>Conclusion: Retain but remove from five year housing supply</p>
HS2.6 (SHELAA ref. 19C233x, 19C072)	Land South of South Road, Bretherton	Croston, Mawdesley & Euxton South	26	Not permitted	N/A	N/A	<p>Said to be deliverable between 2027-2029.</p> <p>Located in a tier 5 semi-rural settlement, and so there are only limited services and transport options here.</p> <p>Subject to high levels of surface water flood risk across the north and centre of the Site.</p> <p>The Site is adjacent to a conservation area and Grade II listed building. The SHELAA states that the Site makes a small contribution to the significance of this.</p> <p>The site is highly constrained, and it is unlikely that a viable and suitable development proposal could come forward here.</p> <p>Conclusion: Retain but remove from five year housing supply</p>

HS2.8 (SHELAA ref. 19C236x, 19C088, 19C144)	Charter Lane, Charnock Richard	Eccleston, Heskin & Charnock Richard	117	Majority of the Site benefits from planning permission (allowed at appeal)	21/00327/FUL MAJ APP/D2320/W /22/3313413	Full permission	<p>Site is said to be deliverable between 2028-2029.</p> <p>Much of the Site benefits from full permission for the development of 76 dwellings. The full site has been promoted by the landowner through the call for sites process.</p> <p>The area of land outside of the planning permission is a logical infill to the existing development area. A planning permission is being prepared for this area.</p> <p>Conclusion: Retain but remove 41 units from five year housing supply</p>
HS2.13	Eaves Green, off Lower Burgh Way	Chorley	419	Yes	16/00804/FUL MAJ	Full	<p>The site is identified for potential development between 2028 and 2031. Several key constraints have been identified, including five public rights of way running through the site, as well as a low-to-medium surface water flood risk affecting the northern portion. Additionally, the entire site falls within coal mining reporting areas and is situated within the Lancashire Valleys national character area, specifically classified as Upland Fringe with vales and valleys typology.</p> <p>The site is allocated for 419 dwellings, of which 187 have already been built. A planning application (reference 16/00804/FULMAJ) for the construction of 201 dwellings, associated access, drainage infrastructure, and public open space is currently under consideration. This application was initially refused on 29 June 2020 but was allowed on appeal on 7 June 2021. Based on a review of the site via Google Maps, it appears construction of the 201 dwellings has commenced.</p> <p>Currently, there are no active planning applications for the remaining portion of the 18.5-hectare site, and there is no evidence suggesting that the circa. 31 dwellings will come forward within the five-year period.</p> <p>Conclusion: Retain</p>
EC5.6	Cowling Farm	Chorley East	242	Not permissioned	N/A	N/A	<p>The site is identified as deliverable between the years 2029 and 2036, and as such, it is partially anticipated to be delivered within a five-year period.</p> <p>The site faces several technical challenges that could further delay its development. These include the need to establish a new access point and improvements to public transport infrastructure. The site also has heritage and archaeological considerations, as it contributes to the historical landscape context and setting of a designated heritage asset.</p> <p>Currently, there is no active planning application for the site, and no significant progress has been made towards its delivery. According to the Planning Practice Guidance (PPG), evidence of deliverability must include planning status and progress toward the submission of an application, both of which are lacking in this case.</p> <p>As the allocation is a legacy designation, it indicates a lack of market appetite for the site. Therefore, it is appropriate to remove the 242 units from the Council's claimed supply for years 1-5.</p> <p>Conclusion: Outcome: Remove from housing supply</p>

EC5.6 (SHELAA ref. 19C242x, 19C160)	Woodlands, Southport Road, Chorley	Chorley North West	97	Not permissioned	N/A	N/A	<p>Site is said to be deliverable for mixed use between 2029 and 2034.</p> <p>The Site is subject to a large patch of surface water flood risk within the centre of the Site, and is also at risk of reservoir and sewer flooding.</p> <p>The Site is surrounded by ancient woodland and TPO'd trees. Biological heritage sites are also adjacent to the boundary.</p> <p>The employment land review says that residential development would come forward by way of cross funding employment part of the scheme.</p> <p>Conclusion: Retain but remove from five year housing supply</p>
HS1.17	Cabbage Hall Fields	Chorley North & Astley	17	Not permissioned	n/a	n/a	<p>The site is identified for delivery between 2033 and 2034, placing it within the 6-10 year category. It is owned by Chorley Borough Council with freehold tenure. The surrounding sites primarily consist of non-built-up land, industrial or manufacturing land, and residential areas.</p> <p>The site features one public right of way and several mature trees, although these are not subject to Tree Preservation Orders (TPOs). A slight slope from south to north is also a noted constraint. Additionally, a Central Lancashire Highways and Transport Masterplan is currently being prepared to assess the traffic impact of preferred allocations and identify necessary mitigation measures.</p> <p>Currently, there is no active planning application for the site. It is anticipated that a buffer zone will be required between the development and the adjacent commercial units, which may make the proposed 17 units challenging to deliver. This is a legacy allocation with no market interest and no evidence suggesting it will come forward in the near future.</p> <p>Conclusion: Discount from housing supply.</p>
EC5.4 (SHELAA ref. 19C248x, 19C175)	Land adjacent to Northgate Drive, Chorley	Chorley North & Astley	10	Not permissioned	N/A	N/A	<p>Site said to be deliverable for mixed use development between 2031 and 2033. Allocated for 21 units but reduced to 10 in emerging LP under mixed use policy EC5.4. Historic allocation with no developer on board. No evidence that housing will be delivered.</p> <p>The entire Site is covered by mature tree cover. The Site is adjacent to a pond where aquatic habitats are likely present.</p> <p>There is surface water flood risk around the perimeter of the Site.</p> <p>Conclusion: Remove from housing supply</p>

HS2.12 (SHELAA ref 19C250x, 19C188)	Bengal Street Depot, Chorley	Chorley North West	62	Not permitted	N/A	N/A	<p>Said to be deliverable between 2032-2033.</p> <p>The Site is occupied but is being promoted by the landowner, suggesting the Site is available.</p> <p>There is risk of surface water flooding around the south of the Site. A flood risk assessment will be required to mitigate and accord with NPPF.</p> <p>The SHELAA states that there is a medium to high risk of significant contamination issues given the previous industrial use.</p> <p>Significant constraints (flood risk, contamination) that the landowner (Chorley Council) have said can come forward despite of this.</p> <p>Conclusion: Retain 62 units</p>
HS2.16	Land to the East of Wigan Road	Clayton West & Cuerden	115	Yes	22/00692/FUL MAJ	n/a	<p>This site is existing allocation HS1.31 rolled over into the new LP. The new LP allocation comprises 2 parcels. The western parcel has planning permission for 103 units. This leaves 229 units at the western parcel. The parcel doesn't have planning permission and anticipated to come forward 2028-36, though no rationale provided for delivery rates.</p> <p>Outcome: Retain but remove western parcel from five year housing land supply</p>
HS2.18 (SHELAA ref. 19C254x, 19C013, 19C066, 19C104)	North of Hewlett Avenue, Coppull	North of Hewlett Avenue	67	Permission granted.	21/01076/FUL MAJ	Full Planning	<p>Site said to be deliverable between 2025-2028.</p> <p>Site benefits from full planning permission for the demolition 1 dwelling and the construction of 67 dwellings Net increase of 66 dwellings.</p> <p>Some surface water and heritage constraints that have been resolved through the planning process.</p> <p>Conclusion: Retain 66 units, discount 1.</p>
HS2.19	Mountain Road	Coppull	12	Not permissioned	n/a	n/a	<p>The site is located on the edge of the urban area of Coppull, with neighbouring sites primarily consisting of undeveloped land and residential areas.</p> <p>The entire site is classified as Grade 3 agricultural land, indicating that it is of good to moderate quality. Additionally, the site contains several mature trees, which contribute to its natural character. A portion of the site, specifically the southeastern 2.56%, is designated as Green Belt land. As such, any development proposals for this area would be deemed inappropriate unless justified by very special circumstances.</p> <p>There is no planning history associated with the site. However, it is allocated for 17 residential units as part of the emerging draft allocation (CH/HS1.29). Due to this allocation, the site has been double-counted in the Council's housing land supply. It is recommended that 12 units be removed from the Council's claimed housing land supply.</p>

							Conclusion: Discount from housing supply
HS2.20 (SHELAA ref. 19C256x, 19C064)	Land adjacent to Blainscough Hall, Blainscough Lane, Coppull	Coppull	118	Permission granted.	APP/D2320/W /21/3275691 23/00780/RE MMAJ	Outline and Reserved Matters planning	<p>Site said to be deliverable between 2025-2029.</p> <p>Site benefits from full planning permission. Some surface water, ecology and heritage constraints that have been resolved through the planning process.</p> <p>Conclusion: Retain 118 units</p>
HS2.23 (SHELAA ref. 19C262x, 19C002, 19C314, 19C115)	East of Tincklers Lane, Eccleston	Eccleston, Heskin & Charnock Richard	15	Outline permission	22/00407/OUT MAJ	Outline	<p>Site is said to be deliverable between 2027-2028. Outline planning permission has been obtained.</p> <p>Some surface water flood risk around the perimeter of the Site which has been addressed through the planning permission.</p> <p>No evidence to show how this Site can be deliverable in accordance with NPPF. Land has been promoted for 9+ months with no evidence of market interest.</p> <p>Conclusion: Discount 15 units</p>
HS2.25 (SHELAA ref. 19C264x, 19C070)	Pear Tree Lane, Euxton	Euxton	100	Not permitted	N/A	N/A	<p>Site is said to be deliverable between 2029-2032. Being promoted by the landowner, Homes England.</p> <p>Field parcels are bound by lines of trees and vegetation. Surface water flood risk along the perimeter. TPO'd trees around the north-west of the Site.</p> <p>Conclusion: Retain 100 units but remove five year housing supply</p>
EC5.1 (SHELAA ref. 19C265x)	Southern Commercial, Buckshaw Village	Buckshaw & Whittle	41	Not permitted (permission for employment only)	N/A	N/A	<p>Said to be deliverable for mixed use development between 2026 and 2030.</p> <p>Planning permission obtained for office development (ref. 23/00927/MNMA) The approved site plan makes no allowance for residential. Employment Land Review states that there are difficulties in delivering these offices, and so the future prospects are not confirmed.</p> <p>The site promoter has asked that this site is allocated for mixed use to allow further flexibility.</p> <p>High levels of surface water flooding across a large portion of the site indicates that residential development here would not be feasible or deliverable. In the absence of any evidence to indicate how this will be mitigated, the Site should be discounted for residential development.</p> <p>Conclusion: Retain but remove from housing supply</p>

HS2.33 (SHELAA ref. 19C271x, 19C184, 19C376)	Land off Blackburn Road, Wheelton	Chorley North East	40	Permission obtained in outline.	APP/D2320/W/22/3312908 21/00847/OUT MAJ	Outline planning	<p>Said to be deliverable between 2028 and 2030.</p> <p>Outline planning permission obtained in March 2023 for the development of 40 dwellings here.</p> <p>No evidence of any reserved matters application being promoted.</p> <p>Conclusion: Retain but remove from five year housing supply</p>
HS2.5 (SHELAA ref. 19C272x, 19C103, 19C134)	Babylon Lane, Adlington	Chorley South East & Heath Charnock	40	Appeal dismissed	23/00510/OUT MAJ	Outline application	<p>Said to be deliverable between 2027-2029.</p> <p>There are areas of surface water flood risk around the boundary, and so the flood risk sequential test will need to be applied. There are also areas of TPO'd trees within the north east.</p> <p>An appeal for a residential proposal was dismissed in 2023 due to flood risk. This position has not changed and so we do not consider this site to be developable.</p> <p>Conclusion: Discount 40 units</p>
HS2.26 (SHELAA ref. 19C359)	Land to the east of New Street, Mawdesley	Croston, Mawdesley & Euxton South	41	Not permitted	N/A	N/A	<p>Site said to be delivered between 2029-2030. Whilst the site has constraints, we understood a developer is on board and technical work is being progressed.</p> <p>Conclusion: Retain but remove from five year housing land supply</p>
HS2.30 (SHELAA ref. 19C275x, 19C170, 19C339)	Rear of New Street, Mawdesley	Croston, Mawdesley & Euxton South	7	Not permitted	N/A	N/A	<p>Said to be deliverable between 2029 and 2030.</p> <p>The site is subject to surface water flood risk and flooding from sewers. There is low to medium risk of contamination due to the historic industrial use. Issues with access.</p> <p>No evidence to display how these constraints can be mitigated or overcome. No evidence presented to show how it is being promoted, and it is unclear why this Site can come forward 10 years prior to the adjacent Site (HS2.29).</p> <p>Conclusion: Retain but remove from housing supply</p>

HS2.27 (SHELAA ref. 19C276x, 19C182, 19C338)	Land off Gorsey Lane, Mawdesley	Croston, Mawdesley & Euxton South	55	Planning permission obtained	22/00941/FUL MAJ	Full	<p>Site said to be delivered between 2025-2027. Full planning permission has been obtained for the development of 55 dwellings. Some surface water flood risk and TPO's that have been addressed through the planning application process.</p> <p>Conclusion: Retain</p>
HS2.34 (Site ref. 19C277x, 19C027, 19C040, 19C151, 19C331)	West of M61 - Land North of Hill Top Farm, Whittle-le-Woods	Buckshaw & Whittle	55	Not permitted	N/A	N/A	<p>Site said to be deliverable between 2027 and 2030.</p> <p>Highways issues with pedestrian access and road width that would have to be overcome.</p> <p>Some surface water flood risk and issues with contamination due to the adjacent quarry.</p> <p>The Site does not have access to gas or foul water – additional infrastructure will need to be developed in order to support this.</p> <p>Due to the utilities issues, highways constraints and contamination issues, this Site is not said to be developable.</p> <p>Conclusion: Retain</p>
HS2.35 (SHELAA ref. 19C281x, 19C001)	West of M61 - Town Lane, Whittle-le-Woods	Buckshaw & Whittle	289	Majority of the site subject to planning approval (subject to S106)	23/00981/FUL MAJ	Full planning	<p>Site is said to be deliverable between 2027 and 2033.</p> <p>Application resolved (subject to legal agreement) for the development of 280 dwellings on the larger Site parcel</p> <p>There is flood risk, heritage, environmental issues that have been resolved through the planning application process.</p> <p>The smaller parcel does not benefit from planning permission and is subject to contamination issues due the Lowe Farm landfill here. This parcel is bound by mature trees and does not have any existing access point. It is therefore considered that this parcel is not deliverable.</p> <p>Conclusion: Retain 280 units, but remove from five year housing supply</p>
HS2.7	Land at Drinkwater Farm, Windsor Drive	Chorley North East	10	Not permissioned	n/a	n/a	<p>The site is located within an established residential area and comprises a small patch of green open space. Google Earth imagery shows that the site includes a driveway (Balmoral Drive) running through it, providing access to an existing dwelling. Due to the site having no road frontage, third party adjoining land may be required to obtain a suitable access into the site for development.</p>

							<p>The site features several mature trees, which present further constraints to the developable area. These elements, along with the site's relatively small size, pose challenges to anticipated capacity of 12 dwellings. There is also planning applications at the site.</p> <p>The site is identified as deliverable between 2029 and 2030, indicating it is expected to be developed within a five-year period. According to Paragraph 72 of the NPPF, a site is considered deliverable if it is likely to come forward within five years of the intended adoption date. However, there is currently no submitted application for the site, suggesting limited progress towards its delivery. Furthermore, the Planning Practice Guidance (PPG) requires evidence of deliverability, such as planning status and progress towards submitting an application, which is currently absent in this case.</p> <p>Additionally, the site has been identified as a draft allocation under CH/HS1.5 for 12 dwellings as part of the emerging local plan. Given that the site is double counted, it should be excluded from the council's claimed supply.</p> <p>Conclusion: Remove from housing supply.</p>
HS2.37 (SHELAA ref. 19C285, 19C285x)	Hill Top Farm, Whittle-le-Woods	Buckshaw & Whittle	75	Planning application under determination	23/00727/OUT	Outline planning	<p>This Site comprises two parcels of land on either side of Hill Top Lane, said to be deliverable between 2031-2035.</p> <p>There are some highways, flood risk, heritage and environmental constraints which are being resolved through the planning application process.</p> <p>Conclusion: Retain 75 units</p>
HS2.28 (SHELAA ref. 19C346)	Crow Nest Cottage, Mawdesley	Croston, Mawdesley & Euxton South	8	Not permitted	N/A	N/A	<p>Site said to be delivered between 2037-2038.</p> <p>There are numerous constraints to the site including access, trees, and low levels of contamination.</p> <p>No evidence to show how it is being promoted.</p> <p>Conclusion: Discount 8 units</p>
HS2.29 (SHELAA ref. 19C359)	East of New Street, Mawdesley	Croston, Mawdesley & Euxton South	11	Not permitted	N/A	N/A	<p>Said to be deliverable between 2036 and 2037.</p> <p>The site is subject to surface water flood risk and flooding from sewers. There is low to medium risk of contamination due to the historic industrial use. Issues with access.</p> <p>No evidence to display how these constraints can be mitigated or overcome. No evidence presented to show how it is being promoted.</p> <p>Conclusion: Retain 11 units</p>

HS2.15	Chancery Road	Chorley North & Astley	16	Yes	23/00530/OUT MAJ	Outline	<p>The site is identified for potential delivery in the years 2026/2027 and therefore in the 1-5 year period. Currently, it is a level, grassed parcel of land with no vehicular access. The northern, eastern, and western edges of the site are lined with a mix of tree and hedge cover, including individually protected oak trees to the north and east (TPO 15-22) under Chorley BC TPO 5 (Euxton) 2013. Additionally, there is a group Tree Preservation Order (TPO G4) for Field Maple and Ash trees running parallel to West Way.</p> <p>Part of the allocation was previously included in planning permissions for the development of 50 residential dwellings to the north and east, which have now been completed and occupied. The site also includes the redevelopment of existing facilities, such as eight 15-meter floodlighting columns, with initial permission granted in 2013 and several subsequent amendments.</p> <p>Regarding planning status, an outline planning application for the erection of up to 16 dwellings, with all matters reserved except for access, was submitted on 22 June 2023 and is currently pending determination. However, no reserved matters application has been submitted yet.</p> <p>The remaining portion of the site currently houses TC's Sports Bar and a play pitch, which could present additional challenges. Specifically, any remaining leases on the sports bar would need to be investigated. There may also be concerns regarding the potential loss of the play pitch, which could require further scrutiny by Sport England and potentially delay the development process.</p> <p>Conclusion: Retain 16 units but as part of the Council's claimed 6-10 years supply.</p>
HS2.10 (SHELAA ref. 19C393a, 19C069, 19C109, 19C120, 19C393ax)	Little Knowley Farm, Chorley	Chorley North & Astley	150	Appeal dismissed	21/00253/OUT MAJ APP/D2320/W /23/3314846 22/00538/OUT MAJ	Outline	<p>Site is said to be deliverable between 2031-2035.</p> <p>An appeal for a residential proposal was dismissed in December 2023 due to the impact on character and appearance of the area. A separate planning application was withdrawn the year prior to this.</p> <p>It is understood that a developer is on board and preparing an updated scheme for the site which takes account of previous reasons for refusal.</p> <p>Conclusion: Retain</p>
HS2.21 (SHELAA ref. 19C399a, 19C067, 19C348)	Orchard Heys Farm, Coppull	Coppull	10	Not permitted	N/A	N/A	<p>Site said to be deliverable between 2029-2030 Site is being promoted by the landowner.</p> <p>The Site is very small and tightly bound by the Green Belt to the north (which this allocation avoids) residential dwellings to the east and a care home to the south.</p> <p>Access is said to be narrow and will require upgrading to facilitate development here. There are high levels of surface water flood risk around the east and north-west of the site (including the access).</p> <p>There are heritage constraints that will need to be investigated through the planning process, as well as two TPO'd trees within the southern boundary.</p>

							<p>The Site is considered to be reasonably deliverable due to the constraints listed above. No evidence of technical work to display how this could be mitigated and overcome. NPPF requires this.</p> <p>Conclusion: Discount 10 units</p>
<p>HS2.31</p> <p>(SHELAA ref. 19C400a, 19C376, 19C400ax)</p>	<p>Blackburn Road, Wheelton</p>	<p>Chorley North East</p>	<p>6</p>	<p>Not permitted</p>	<p>N/A</p>	<p>N/A</p>	<p>Said to be deliverable between 2031 and 2032. Promoted by the landowner.</p> <p>TPO'd trees around the perimeter of the Site.</p> <p>Access to A674 is not supported by the highways authority on the basis of feasibility. They have said that access via Ryefield Road is acceptable in principle but does not look feasible due to the mature vegetation and level change between the Site and the road. There is no evidence has been made available to suggest otherwise.</p> <p>Conclusion: Discount 6 units</p>
<p>HS2.36</p> <p>(SHELAA ref. 19C401a, 19C280x, 19C366, 19C374)</p>	<p>West of M61 - Land adjacent to Delph Way, Whittle-le-Woods</p>	<p>Buckshaw & Whittle</p>	<p>102</p>	<p>Not permissioned.</p>	<p>N/A</p>	<p>N/A</p>	<p>Site is said to be deliverable between 2032 and 2035.</p> <p>Greenfield parcel of land. There is a public right of way to the north of the Site, as well as a landfill. The EA have suggested that contamination from this landfill may have migrated via groundwater.</p> <p>The Site contributes to the significance of the Whittle Hill Tunnels heritage asset and its setting.</p> <p>There is steep topography across the Site. Cut and fill methods to construction will be required to deliver any development here.</p> <p>It is not evidenced how vehicular access into the site will be obtained, nor is there any clear or logical position for this to be created. For a development of this size, significant road improvements will need to be made.</p> <p>In the absence of evidence to suggest otherwise, it is not considered feasible to bring forward this Site, both due to the contamination issues and topography, and it is therefore not deemed to be deliverable.</p> <p>Conclusion: Discount 102 units</p>

EC5.7 (SHELAA ref. 19C411)	Land south west of The Green and Langton Brow, Ecclestone	Ecclestone, Heskin & Charnock Richard	32	Not permissioned	N/A	N/A	<p>The Site is said to be deliverable for mixed use development between 2028 and 2030.</p> <p>The majority of the Site (circa 70%) is situated within Flood Zones 2 and 3 and within surface water flood risk. Residential land use is likely to be considered unacceptable here.</p> <p>A separate point of access would be required should residential element come forward alongside employment use.</p> <p>In the absence of evidence to suggest otherwise, residential use is unlikely to be considered viable or deliverable here. Discount.</p> <p>Conclusion: Retain but remove from housing supply</p>
HS2.14 (SHELAA ref. 19C413, 19C173)	Land 120m South West of 21 Lower Burgh Way, Chorley	Coppull	201	Planning permitted	APP/D2320/W/20/3265785 16/00804/FUL MAJ	Full planning	<p>Said to be deliverable between 2024-2031</p> <p>Permission has been granted for this development already and construction looks to have started on site.</p> <p>Conclusion: Retain 201 units</p>
HS2.4 (SHELAA ref. 19C414, 19C005, 19C132)	Land at Carrington Road, Adlington	Adlington and Anderton	24	Permission granted	20/01200/OUT MAJ 23/01121/RE MMAJ	Outline and Reserved Matters	<p>Said to be deliverable within 2025-2027 timeframe.</p> <p>This is a greenfield Site that is surrounded by mature vegetation.</p> <p>There is a small area of surface water flood risk along the eastern Site boundary.</p> <p>Constraints have been resolved through the planning application process and the Site is being progressed by a developer.</p> <p>Conclusion: Retain 24 units</p>
EC5.5	Botany Bay/ Great Knowley, Blackburn Road, Chorley	Chorley North & Astley	100	Permission obtained	22/01243/FUL MAJ – employment permission 19/01113/OUT MAJ – residential permission for 233 dwellings 17/00714/OUT MAJ –	Outline and full	<p>Said to be deliverable for mixed use development between 2026 and 2034.</p> <p>There are linear sections of protected trees (TPOs) and surface water flood risk within the south of the site. This part of the Site is not considered suitable for residential development.</p> <p>The northern half of the Site is subject to a historic outline residential permission which was never built out. A more recent 2024 full employment permission suggests that this Site is more suited for this use and is being taken forward for this. Residential should therefore be discounted.</p> <p>Conclusion: Retain</p>

					residential permission for 188 dwellings.		
HS2.17 (SHELAA ref. 19C251x, 19C009, 19C129, 19C177, 19C342)	Land adjoining Cuerden Residential Park, Nell Lane, Clayton-le-Woods	Clayton West & Cuerden	115	Planning permitted at appeal	20/00377/FUL MAJ APP/D2320/W /21/3272623	Full planning	<p>Part brownfield part greenfield Site, said to be deliverable between 2028-2036.</p> <p>Full planning obtained in 2020 for the development of 115 dwellings. Discharge of condition applications have been submitted and are currently under consideration.</p> <p>No major constraints to development.</p> <p>Conclusion: Retain 115 units.</p>
HS2.24 (SHELAA ref. 19C417, 19C002, 19C076)	Land at Tincklers Lane, Eccleston	Eccleston, Heskin & Charnock Richard	66	Permission obtained at appeal	20/01331/OUT MAJ	Outline	<p>Site is said to be deliverable between 2027-2028.</p> <p>Outline planning permission has been obtained and S106 signed. Reserved matters and discharge of condition permission been obtained.</p> <p>Some surface water flood risk around the perimeter of the Site which has been addressed through the planning permission.</p> <p>Conclusion: Retain 66 units</p>
HS2.32 (SHELAA ref. 19C427)	Land at Millbrook Close/Victoria Street, Wheelton	Chorley North East	9	Planning pending	24/00247/FUL	Full planning application	<p>Said to be deliverable between 2026-2027.</p> <p>Planning application currently under construction for the construction of 9 dwellings. Highways authority objections that are being worked through.</p> <p>Surface water flood risk to the north of the Site. Public right of way running east to west.</p> <p>Conclusion: Retain 9 units but remove from five year housing supply</p>
HS2.22 (SHELAA ref. 19C434)	Land to the rear of 62-66 Moor Road, Croston	Croston, Mawdesley & Euxton South	2	Not permitted	N/A	N/A	<p>Site is said to be deliverable between 2028-2029.</p> <p>The Site is surrounded by residential properties on all sides, and there is no existing or obvious option for vehicular access other than expansion of a small narrow footway. This doesn't look feasible without the loss of one of the neighbouring dwellings.</p> <p>The south of the Site is subject to levels of surface water flood risk, and there is a record of sewer flooding in the vicinity.</p>

							<p>No evidence of technical work to display how this could be mitigated and overcome. NPPF requires this.</p> <p>Conclusion: Discount 2 units</p>
Existing commitments (non allocated sites) (over 50 units)							
n/a	Derian House / Strawberry fields, Euxton Lane	Chorley	122	Yes	15/00224/OUTMAJ 19/00904/RE MMAJ	Outline	<p>The Site is bound by the Manchester to Preston railway line to the north, Strawberry Fields to the east, Euxton Road to the south and land currently under development as part of the wider outline consent to the west.</p> <p>Planning permission (Ref. 15/00224/OUTMAJ) was granted on 4 December 2015 for development as follows: "Outline application (specifying access only) for a mixed use development comprising Digital Health Park, industrial/employment units (Use Classes B1/B2/B8); Care Home and Specialist Care Facility (Use Class C2); local convenience store (Use Class A1); family pub (Use Class A4) and/or medical centre (Use Class D1); residential units (Use Class C3) and associated access, landscaping and infrastructure."</p> <p>The principle of residential development on the Site has been established through the outline consent (for a maximum of 125 dwellings). A reserved matters application for 122 residential units was approved in March 2021. Current observations via Google Maps show active construction, with units being delivered.</p> <p>Conclusion: Retain 122 units of the Council's claimed 1-5 years supply.</p>
n/a	Nursery Park Road	Coppull	118	Yes	20/01399/OUTMAJ 23/00780/RE MMAJ	Outline	<p>Reserved matters application (appearance, landscaping, layout and scale) comprising the erection of 118 no. dwellings including internal access roads, public open space, parking and associated infrastructure in pursuant to outline planning permission ref:20/01399/OUTMAJ was granted in February 2024. Discharge of conditions attached to reserved matters permission has commenced and development is coming forward at the site.</p> <p>Conclusion: Retain 118 units of the Council's claimed 1-5 years supply.</p>
n/a	Pear Tree Lane	Euxton	180	Yes	19/00654/OUTMAJ 21/00635/RE MMAJ	Outline	<p>A reserved matters application (appearance, landscaping, layout, and scale) for the erection of 131 dwellings and associated infrastructure pursuant to outline planning permission ref: 19/00654/OUTMAJ / appeal ref: APP/D2320/W/20/3247136 has been approved. A non-material amendment was most recently approved in October 2024 to make minor changes to the approved layout. A series of discharge of conditions applications have been approved, suggesting that the development is progressing at the site. In conclusion, it is recommended to retain 180 units of the council's claimed housing supply.</p> <p>Conclusion: Retain 180 units of the Council's claimed 1-5 years supply.</p>
n/a	DXC Technology, Euxton Lane	Euxton	108	Yes	21/01475/FULMAJ	Full	<p>The appeal is allowed and planning permission is granted for the erection of 108 no. dwellings (Use Class C3) with associated access, landscaping, parking and other works following demolition of existing building at the Former DXC Technology Site,</p>

							<p>Euxton Lane, Chorley, PR7 6FE in accordance with the terms of the application, Ref 21/01475/FULMAJ, dated 17 December 2021. The most recent discharge of conditions application was approved in September 2024. However, from google maps however there is no change to the site to suggest development has commenced.</p> <p>Conclusion: Retain</p>
n/a	33 Town Lane	Whittle-le-woods	250	Yes	22/01142/OUT MAJ	Outline	<p>Outline planning for the construction of up to 250 dwellings and associated infrastructure (including 30% affordable housing), with all matters reserved aside from the access from Town Lane (resubmission of application ref. 20/01347/OUTMAJ), was approved in February 2024. At the time of writing, no reserved matters application has been submitted at the site. It is suggested that this site be monitored to ensure the submission of a reserved matters application. The permission is not yet extant and therefore it remains reasonable to assume that development will proceed on the site.</p> <p>Conclusion: Retain.</p>
n/a	Parcel C1 and C2, Central Avenue	Euxton	77	Granted	24/00226/FUL MAJ	Section 73	<p>Section 73 application to amend condition 3 (approved plans) of planning permission 20/01141/FULMAJ, as amended by minor non-material amendment 23/00830/MNMA which reduced the number of dwellings from 80 to 77, was granted in July 2026. Conditions have been discharged and a start made on site.</p> <p>Conclusion: Retain 77 units in claimed</p>

Preston Housing Land Supply Proformas

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
Proposed Allocations							
HS4.1	Former Whittingham Hospital	Preston Rural East	477	Permission secured	06/2025/0008	Reserved Matters	<p>Legacy allocation site HS1.15. Homes England have provided an update as of May 2024. The site is still subject to Reserved Matters approval (06/2025/0008), so the Council has taken a more conservative approach and pushed back expected completions into 6years + timeframe. Conditions are being discharged.</p> <p>Conclusion: Retain</p>
HS4.2	Land off Riversway and West of Dodney Drive Lea	Lea and Larches	280	Permission secured	06/2018/0885 & 06/2022/1177	Reserved Matters	<p>Access constructed. The council has taken a more cautious approach and spread the proposed development over 7 years.</p> <p>Conclusion: Retain</p>
HS4.3	Land at Eastway	Preston Rural East	56	Not permissioned	N/A	N/A	<p>This Site is said to come forward in the long term from 2035 and beyond.</p> <p>There is some surface water flooding across the Site.</p> <p>A new substation and sewerage might be required depending on the capacity of surrounding schemes. There is also a pressurised water main within the boundary. These infrastructure queries will need to be resolved through any forthcoming planning application.</p> <p>There is no known developer interest in the Site.</p> <p>Conclusion: Retain 56 Units.</p>
HS4.4	Cardwell Farm, Garstang Road, Preston, PR3 5DR	Preston Rural North	151	Planning permission secured	06/2022/0644	Hybrid (47 in full and 104 in outline)	<p>Under construction.</p> <p>Conclusion: Retain</p>
HS4.5	Land off Ribbleton Hall Drive	Ribbleton	97	Not permissioned	N/A	N/A	<p>This Site comprises two development parcels and is said to come forward in the long term from 2036 and beyond.</p> <p>There is some surface water flooding across the Site. The wider network suffers from congestion, with limited public transport options.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>There is no known developer interest in the Site.</p> <p>Conclusion: Retain</p>
HS4.6	Horricks Mill, Queen	City Centre	380	Planning permission secured	06/2023/0818	Outline	<p>Outline permission for 380 units, including building heights of up to 10 storeys. No evidence Reserved Matters is being prepared or delivery commentary from developer. Significant development is envisaged in this part of the City Centre with no evidence the market can accommodate the numbers proposed.</p> <p>Outcome: Remove from housing supply</p>
HS4.7	The Larches, Larches Lane	Lea and Larches	15	Planning under consideration	06/2024/0750	Full	<p>The Site is said to come forward from 2031.</p> <p>A planning application for 19 dwellings has been submitted and is currently under consideration.</p> <p>Surface water and access constraints are said to be dealt with through planning application.</p> <p>The land comprises undeveloped greenfield land with some mature TPO'd trees, so the ecology baseline for BNG purposes will be high.</p> <p>Conclusion: Retain</p>
HS4.8	115 Church Street	City Centre	57	Not permissioned	N/A	N/A	<p>The Site is said to come forward from 2031. Is currently in use as a temporary car park.</p> <p>Surface water flood risk to the north of the Site and around the access road.</p> <p>Adjacent to a Grade II building. High levels of surface water flood risk to the north of the Site and around the access road.</p> <p>The Site may be of archaeological interest and so a desk-based assessment into this will need to accompany any forthcoming planning application.</p> <p>Part of wider regeneration area to the east of Preston City Centre. No evidence the market can accommodate high density development is this location.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							Conclusion: Remove from housing supply
HS4.9	37 -41 Church Street	City Centre	29				<p>The Site is said to come forward from 2031. Is currently in use as a temporary car park.</p> <p>An existing building is in situ at the Site. Not clear whether in use. No planning permission. No evidence to suggest the market accommodate the scale of high-density development envisaged at this part of Preston.</p> <p>Conclusion: Remove from housing supply</p>
HS4.10	Moor Park Depot, Moor Park Avenue	Deepdale	17	Planning application submitted.	06/2024/0889	Full	<p>The Site is said to be deliverable from 2031. Promoted by McCarthy Stone. Planning application for 51 retirement units pending consideration.</p> <p>The parcel is bound by mature trees on all sides.</p> <p>St Thomas Road is the only road adjacent to the Site, and it is narrow and subject to on-street parking. Access has been considered by the Highways Authority and is said to be possible but would need to be considered in detail.</p> <p>Adjacent to the Moor Park Conservation Area and the Moor Park Grade II listed Registered Park and Garden.</p> <p>The Site may be of archaeological interest and so a desk-based assessment into this will need to accompany any forthcoming planning application.</p> <p>Conclusion: Retain 17 units</p>
HS4.11	Former Tulketh High School, Tag Lane	Cadley	30	Not permissioned	N/A	N/A	<p>The Site is said to be deliverable in 10+ years, 2035 and beyond. There is no known developer interest.</p> <p>Part of the Site has an existing allocation for 30 units under HS1.11.</p> <p>There are some small areas of surface water flood risk, and the eastern edge of the Site is within Flood Zones 2 and 3.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>Lancashire County Council has plans for the redevelopment of the Former Tulketh High School for a new secondary school. The school is said to accommodate rising pupil numbers as a result of significant housing growth in the area. The deadline for this decision is said to be the end of March 2025, and so the future of this Site is not yet confirmed.</p> <p>Conclusion: Remove from housing supply</p>
HS4.12	Land at Cottam Hall	Ingol and Cottam	211	Planning permitted	06/2021/1022	Full	<p>This Site is said to come forward between 2025-2030. Planning permission has been obtained, and development has already commenced on Site.</p> <p>Conclusion: Retain</p>
HS4.13	Heather Moor, Cumeragh Lane	Preston Rural East	41	Not permitted	N/A	N/A	<p>The Site is said to be deliverable from 2031. There is no known developer interest.</p> <p>This Site is within an Area of Separation under the current 2012-2026 Preston Local Plan.</p> <p>The Highways Authority have stated that development here would require a staggered junction near Half Penny Lane which may result in safety concerns that would need to be overcome. Congestion at known strategic pinch points may also be contributed to through development here.</p> <p>With no evidence that the highways and flood risk issues can be overcome, and with no known developer interest, we consider this Site to be undeliverable.</p> <p>Conclusion: Discount 41 units</p>
HS4.14	Gorlands, Whittingham Road	Preston Rural East	32	Not permitted	N/A	N/A	<p>The Site is said to be deliverable from 2031. There is no known developer interest. This Site sits adjacent to HS4.13.</p> <p>This Site is within an Area of Separation under the current 2012-2026 Preston Local Plan.</p> <p>The Highways Authority have stated that there is no visibility to the east of the Site into Whittingham Lane, and that there is a possible ransom issue. Congestion at known strategic pinch points may also be contributed to through development here.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>With no evidence that the highways and flood risk issues can be overcome, and with no known developer interest, we consider this Site to be undeliverable.</p> <p>Conclusion: Discount 32 units</p>
HS4.15	Lancashire Fire and Rescue HQ, Garstang Road	Greyfriars	40	No permission	N/a	N/a	<p>Anticipated to come forward towards the end of the plan period (10+ years). Brownfield site with existing fire and rescue operation evident. Legacy allocation (HS1.1). No developer interest and no planning application submitted.</p> <p>Conclusions: Remove from housing supply</p>
HS4.16	Brethens Meeting Room, Egerton Road	Ashton	12	No permission	N/a	N/a	<p>Anticipated to come forward towards the end of the plan period (10+ years). Brownfield site with existing building at centre of site. Legacy allocation (HS1.12). No developer interest and no planning application submitted. No evidence that 12 dwellings can be accommodated at the site (with offset distances and BNG etc.).</p> <p>Conclusions: Remove from housing supply</p>
HS4.17	Land North of Tom Benson Way, PR2 3GA	Ingol and Cottam	35	Planning approved	06/2020/0652	Full planning	<p>Community Gateway Association have provided a projected completions trajectory for the site. At May 2023 they expected the site to be complete by the end of April 2025, however no start on site as of April 2024, so the Council has been cautious and pushed back a year.</p> <p>Legacy allocation HS1.13.</p> <p>Outcome: Retain</p>
HS4.18	Former St Joseph's Orphanage, Theatre Street, PR1 8BS	City Centre	67	Planning approved	06/2019/0952	Full Planning	<p>Technical start has been made on site; however, development has stalled. No evidence to suggest there is an appetite from the developer to complete scheme, or whether the market can accommodate development in this part of Preston viably.</p> <p>Outcome: Remove from housing supply</p>
HS4.19	Avenham Street Car Park	City Centre	294	Planning approved	06/2019/0856	Full Planning	<p>Planning permission secured for 294 units over 16 storeys; however, development has stalled. No evidence to suggest a start has been</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>made on site and thus permission may have expired. Council now envisage development in 10+ years. Legacy allocation under SP4.2.</p> <p>No evidence to suggest there is an appetite from the developer to complete scheme, or whether the market can accommodate development in this part of Preston viably considering the scale of development envisaged in east Preston (especially one of this density / scale at 16 storeys).</p> <p>Conclusion: Remove from housing supply</p>
HS4.20	Grimshaw Street/Queen Street, PR1 3DB	City Centre	146	Planning approved	06/2022/1084	Outline planning	<p>Outline permission for 489 units, including building heights of up to 16 storeys, approved in June 2024.</p> <p>No evidence Reserved Matters is being prepared or delivery commentary from developer. Significant development is envisaged in this part of the City Centre with no evidence the market can accommodate the numbers proposed.</p> <p>The Council envisaged development coming forward in 10+ years which suggests they have no confidence the outline permission will be progressed.</p> <p>Outcome: Remove from housing supply</p>
HS4.21	Former Byron Hotel, Grimshaw Street	City Centre	28	Planning approved	06/2018/1276	Full	<p>Planning permission granted in 2019 for 28 apartments. Technical start made by development has not come forward. Anticipated to come forward after 10+ years.</p> <p>No evidence to suggest development will come forward or that the market can absorb an apartment scheme in this location.</p> <p>Outcome: Remove from housing supply</p>
HS4.22	Mount Street/ Garden Street	City Centre	47	Planning approved	06/2019/0499	Full planning	<p>The Site is said to be deliverable from 2031. It is known to be promoted by Northern Estates Limited, and has permission for 47no apartments, but this is said to have stalled. No evidence to suggest development is being progressed.</p> <p>The Site is within a Conservation Area and comprises a Grade II listed building.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>Demolition works commenced in 2020 but the building site has not progressed in recent years. Following three arson attacks, the building has been left unsafe and demolition works are to begin again. This is expected in March/April 2025.</p> <p>Conclusion: Remove from housing supply</p>
HS4.23	Former Perrys Car Showroom, 63-83 Blackpool Road	St Matthews	55	Planning application disposed.	06/2021/0116	Full planning	<p>Site is said to be deliverable from 2031.</p> <p>A full planning application was submitted in 2021 for the development of 39 dwellings and 16 maisonettes (55 units in total). The last email correspondence received from the application was in May 2023. Given the significant amount of time without contact, the Council made the decision to dispose of the application in March 2025.</p> <p>The draft allocation is situated on a Landfill Site, and is said to have risk of contamination.</p> <p>Surface water flood risk within the centre of the site.</p> <p>In the absence of developer interest, and with the above constraints and planning history in mind, the Site is not considered deliverable.</p> <p>Conclusion: Remove from housing supply</p>
HS4.24	The Sumners, 195 Watling Street Road, Preston, PR2 8AB	Garrison / Deepdale	77	Planning permission secured	06/2023/0531	Reserved Matters	<p>Reserved Matters application 06/2023/0531 relates solely to landscaping. Thus, even though the permission is implemented, there is some uncertain whether the development will come forward. There is no reference to a developer on the RM application form.</p> <p>Conclusions: Retain but remove from five year housing land supply.</p>
HS4.25	25&27 Whittingham Lane and land to the rear of 25-31 Whittingham Lane Broughton	Preston Rural East	8	Not permissioned	N/A	N/A	<p>The Site is said to be deliverable from 2031. There is no known developer interest.</p> <p>The Site is covered by mature tree cover and is adjacent to a band of TPO'd trees. Priority deciduous woodland is also present on site.</p> <p>Allocation requires the demolition of two dwellings to afford vehicular access into the Site.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>In the absence of any evidence to suggest how 8 dwellings could feasibly be achieved on the Site in line with the constraints listed above, we consider the site to be undeliverable.</p> <p>Conclusion: Discount 8 units</p>
HS4.26	Former Gasworks, Ribbleton Lane	St Matthews	59	Not permitted	N/A	N/A	<p>The Site is said to be deliverable in the long term (10+ years) from 2035.</p> <p>The Site was historically occupied by gasholders, but these were removed in 2018/19. The land is still said to be at risk of contamination due to this industrial use.</p> <p>The Site is surrounded on three sides by other employment and industrial uses.</p> <p>There is a small pocket of woodland within the north of the Site.</p> <p>In the absence of developer interest or any evidence to suggest how this constrained site can positively come forward, this site is not considered deliverable.</p> <p>Conclusion: Discount 59 units</p>
HS4.27	50 Lancaster Road	City Centre	5	Not permitted	N/A	N/A	<p>The Site is said to be deliverable from 2031 (6+ years).</p> <p>This Site is expected to come forward for apartment use / conversion of the existing building.</p> <p>The parcel is within the Market Place Conservation Area and the building is Listed. The Site is said to be suitable for housing or a mixed-use site with housing, office or retail.</p> <p>The Site is subject to surface water flood risk to the west.</p> <p>Conclusion: Remove from housing supply</p>
HS4.28	10-12 Lancaster Road	City Centre	5	Not permitted	N/A	N/A	<p>The Site is said to be deliverable from 2035 (10+ years).</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>This Site is expected to come forward for apartment use / conversion of the existing building.</p> <p>The parcel is within the Market Place Conservation Area and the building is Listed. The Site is said to be suitable for housing or a mixed-use site with housing, office or retail.</p> <p>The Site is subject to surface water flood risk to the west.</p> <p>Conclusion: Remove from housing supply</p>
HS4.29	Corner of Manchester Road & Church Street	City Centre	167	Pending planning application on part of the Site.	06/2023/1316		<p>The Site is said to be deliverable from 2031 (6+ years).</p> <p>A planning application is currently under consideration for 280 units. The application site includes the eastern half of the Site along with the land to the north. However, no documents have been uploaded since March 2024 which suggests the application has stalled.</p> <p>This site has large gravity sewers that pass through the Site.</p> <p>There are two Grade II listed buildings on the Site, and a Grade II listed church adjacent.</p> <p>There are high levels of surface water flood risk across the entire site. (84% has 1 in 1000 year flood risk).</p> <p>No evidence to suggest a scheme at the site is viable or deliverable.</p> <p>In the absence of developer interest, it is not clear how the remainder of the Site (western parcel) will come forward alongside the eastern parcel that is currently subject to a planning application.</p> <p>Conclusion: Remove from housing supply</p>
HS4.30	Tulketh Crescent, Preston, PR2 2RJ	Ashton	24	Permission secured	06/2023/0191	Full	<p>Full permission granted in September 2023. Historic allocation HS1.23.</p> <p>Conclusion: Retain</p>
SS3	Land at Bartle, Preston		2,767	Yes	Various	Various	<p>Strategic Site SS3 is in multiple ownerships and being delivered by a variety of parties. The SHELAA states that 2,370 units are anticipated to be delivered within years 6-10, and 397 in 10+years. It</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>is not clear what deliver rates are based on and whether the market can take this scale of development.</p> <p>Outcome: Retain</p>
SS4	Fulwood Barracks	Garrison	330	Not permitted	N/A	N/A	<p>The Site is said to be deliverable from 2031 (6+ years).</p> <p>Promoted by Ministry of Defence. The Site is still operational but is to be decommissioned by MoD (expected within 5 years).</p> <p>There are 16 listed buildings within the Site, and it is located within the Fulwood Conservation Area.</p> <p>The northeastern part of the Site is covered by a landfill consultation zone. Risk of contamination.</p> <p>There are various constraints highlighted by United Utilities including: Onsite modelled sewer flood risk and record of sewer flooding in the vicinity of the site. Pressurized water main, wastewater network structures, pressurised sewer, gravity sewer, easement, UU right of way and UU property within boundary.</p> <p>The Site may be of archaeological interest and so a desk-based assessment into this will need to accompany any forthcoming planning application.</p> <p>Given that the MoD Site is only expected to be decommissioned within the next five years, it is not reasonable to expect any residential development to come forward in six years. Especially given the various constraints listed above and the demolition work that is required.</p> <p>Conclusion: Retain 300 units but push back delivery timeframe.</p>
SS5	Preston West	Lea and Cottam	1850	Partly permitted, subject to S106	06/2022/1011	Full planning	<p>450 units earmarked to come forward within the plan period (Phase A north of the Railway), and 1,400 to come forward 15+ years (Phase B south of Railway).</p> <p>Hybrid application for 161 units in Full and 120 in Outline pending determination (06/2022/1011).</p> <p>The Site is said to be deliverable from 2030 to 2040 (5 to 15+ years).</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>Site in multiple ownerships. Railway Line runs through the site. Pylons and overhead wires down western edge of site. Small strip of biological heritage site follows the canal through the site.</p> <p>Various listed buildings, water courses, highways improvement requirements etc. across the proposed allocation area.</p> <p>Full planning application for 161 dwellings (northern parcel) and outline planning application for 120 dwellings (southern parcel) relating to a smaller parcel of the Site. Application approved but subject to legal agreement.</p> <p>Conclusion: Retain</p>
HS4.30	Tulketh Community School		30				<p>This is a 1.31ha site that could deliver approximately 30 units as part of a lower density residential development. The site is previously developed and currently occupied by school buildings which became vacant following the merger of the school with Fulwood High School and Arts College.</p> <p>Conclusion: Retain</p>
HS1.15	Former Whittingham Hospital remainder of the site		477				<p>Homes England have provided an update as at May 2024. The site is still subject to Reserved Matters approval, so the Council has taken a more conservative approach and pushed back expected completions into 6years + timeframe</p> <p>Legacy allocation site HS1.15. Homes England have provided an update as of May 2024. The site is still subject to Reserved Matters approval (02/01/2025), so the Council has taken a more conservative approach and pushed back expected completions into 6years + timeframe. Conditions are being discharged.</p> <p>Conclusion: Retain</p>
HS4.6	Land off Riversway & west of Dodney		280	Yes	06/2018/0885 & 06/2022/1777	Outline and Reserved Matters	<p>The 15.43ha site is located between the A583 Riversway to the south and the Preston Guild Wheel long distance footpath/cycleway and Savick Brook to the north, at the western edge of the built-up area of Preston.</p> <p>The site benefits from outline permission for 280 dwellings which was approved in August 201 and subsequent reserved matters. As such, it is reasonable to conclude that the site could be deliverable. Accordingly, 280 units are retained from the Council's claimed supply.</p> <p>Conclusion: Retain.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
Existing Commitments							
n/a	Keyfold farm 430 Garstan road	Broughton	89	Yes	06/2019/0040	Outline and Reserved Matters	<p>The site benefits from a reserved matters application (covering appearance, landscaping, layout, and scale) pursuant to outline application 06/2017/0097, which was approved in October 2019 for the development of 129 dwellings.</p> <p>According to the Housing Land Position Statement (April 2024), construction on the site had commenced at the beginning of the monitoring period. Wainhomes has provided a planned development timetable (May 2024), which outlines an anticipated completion date in Winter 2029.</p> <p>Conclusion: Retain</p>
HS4.4	Cardwells Farm Garstang Road Preston	Preston Rural North	151	Yes	06/2018/0238 06/2022/0644	Hybrid	<p>The site is allocated as 'Existing Residential Site' and 'Open Countryside' land according to Preston's interactive policy map (2022).</p> <p>Outline planning permission ref. 06/2018/0238 was granted in 2018 was the erection of 55no. dwellings (resubmission of 06/2016/1207). A reserved matters was approved in July 2021. From google maps it does not appear that development commenced on site and 3 years has passed since this was approved.</p> <p>The site also benefits from a hybrid planning application for full planning application for the erection of 47no. dwellings with associated works (on site 2.11ha) 2) and outline planning application for 104no. dwellings and a community building with associated works (on site 9.33ha) (access applied for only and all other matters reserved for subsequent) was approved August 2023. No reserved matters application has been submitted for the outline element of the permission at the time of writing.</p>
HS4.24	The Sumners, 195 Watling Street Road		77	Yes	06/2019/1340 & 06/2023/0531	Outline and Reserved Matters	<p>Outline planning application for 1no. four storey building comprising a community centre, two flexible units within Classes A1, A2, A3 and D1, and 24no. apartments; and 1no. four to five storey building comprising 53no. apartments; with parking and access from Sir Tom Finney Way and Watling Street Road (access, appearance, scale and layout applied for) was approved in November 2019. Reserved Matters application was approved in May 2023.</p> <p>The Council has contacted PWA for input on proposed start date and build out rates; however, a response has not yet been received. The Council has assumed all units can be built out within the 5 years period.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
SS3	Land at Bartle, Preston		1100	Yes	06/2020/0888	Hybrid	<p>The site is approximately 46-hectares in area and comprises primarily of agricultural land. The site is located in Flood Zone 1 and therefore is at low risk of fluvial flooding. The site does however experience surface water flood sporadically.</p> <p>Hybrid Planning Application was approved in August 2020 which seeks the following:</p> <ol style="list-style-type: none"> 1. Full planning permission for new roundabout junction on Preston Western Relief Road with two spur road accesses off roundabout (east and west stubs), related highway infrastructure, associated works and landscaping; and 2. Outline planning permission for residential development up to 1,100 dwellings (Option 1) or reduced residential (approximately by up to 5%) plus primary level school and small scale local facilities (Option 2), access and circulation roads, cycle routes, pedestrian routes, public open space, green space, tree planting, landscaping, necessary infrastructure and associated works.
n/a	Ingol Golf And Squash Club Tanterton Hall Road, Preston, PR2 7BY		146	Yes	06/2017/0757 06/2022/0779	Outline and Reserved Matters	<p>The Site is located on the northern fringe of the Preston conurbation approximately 3.5km from the centre of Preston and currently comprises the Ingol Village Golf Course, including the Club House (the only building onsite).</p> <p>Hybrid planning application for the redevelopment of land associated with Ingol Village Golf Course, Preston; full application for areas of public open space; outline application for a new first team training facility for Preston North End Football Club and residential development of up to 450 dwellings (access applied for) was approved in May 2018.</p> <p>Reserved matters application (namely appearance, landscaping, layout and scale) pursuant to outline permission 06/2017/0757 for 155no. dwellings was approved in July 2022.</p> <p>According to the Councils latest housing monitoring report, the site is under construction. The Council contacted Rowland Homes for input into build out rates, however at time of writing a response has not been received.</p> <p>Conclusion: Retain but construction earmarked for 2026</p>
n/a	77 Tithebarn Street, Preston PR1 1DJ		124		06/2022/0310	Outline	<p>Outline application seeking approval for access and scale for erection of a 11-storey mixed use building comprising of up to 124no. apartments (Use Class C3) and ground floor leisure/retail space (Use Class E/F1/F2) with associated landscaping and parking, following demolition of the existing building (all other matters reserved). Outline expires 21/09/2026. No evidence Reserve Matters is being prepared.</p> <p>Outline permission for 11 storey mixed use development. Expires 21/09/2026. No evidence Reserve Matters is being prepared.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							Conclusion: Remove from housing supply

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Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
Projected Completions on Allocation Sites							
HS3.8 SHELAA: 19S019	Land at Daub Hall Lane	Coupe Green and Gregson Lane	80	Not permissioned. Planning refused previously.	07/2018/6475/FUL	Full	<p>The Site is said to be deliverable between 2027 and 2031.</p> <p>A planning application for 75 dwellings was refused in 2019. The officer's report concluded that the scheme would have led to the unacceptable urbanisation of the area – detrimental to the character, appearance and openness of the Protected Open Land, which the application Site sat within.</p> <p>No planning permission in place or evidence of developer on board.</p> <p>Conclusion: Retain but remove from 5 year housing supply.</p>
LHS3.18 SHELAA: 19S021	Land adjacent to the Fields, Long Moss Lane	New Longton and Hutton East	8	Not permissioned. Two historic refusals.	07/2012/0348/OUT 07/2022/00182/OUT	Outline	<p>Site anticipated to come forward 2026/2027.</p> <p>A planning application for 27 dwellings was refused in 2021 due to the development's impact on the Green Belt. An appeal was lodged and dismissed.</p> <p>A subsequent planning application for 10 retirement bungalows was again dismissed at appeal in 2024 due to the impact on the Protected Open Land. It was considered inappropriate development within this area.</p> <p>Conclusion: Retain but remove from 5 year housing supply.</p>
HS3.9: SHELAA: 19S039	South of Liverpool Old Road, Much Hoole	Hoole	60				<p>Site anticipated to be deliverable between 2027 and 2031.</p> <p>Highways constraints relating to congestion on Liverpool Road, narrow carriageway and narrow footpath. There is evidence of sewer flooding in the vicinity of the Site. There is also gravity sewer within the boundary. Surface water flood risk within the site, and it is adjacent to an ordinary watercourse or pond.</p> <p>Without evidence of developer interest or any active planning permission or application, the delivery timescale should be pushed back beyond 2031.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							Retain 20 units but push back delivery timescales.
EC6.1 SHELAA: 19S052	Cuerden Strategic Site	Farington East	220		07/2017/0211/ORM		<p>Site anticipated to be deliverable between 2027 and 2032.</p> <p>Historic allocation (EP1.2/HS1.1). Large part of the Site benefits from a 2017 implemented hybrid planning permission for a variety of uses including 116 units. The 116 units are earmarked to come forward as part of a high density scheme up to 13.7m high.</p> <p>There have been two flood reports on Site, and the flood risk comments on the SHELAA recommends that Site is withdrawn for these reasons.</p> <p>There is a Grade II listed building within the Site. This site has long been allocated with evidently minimal market interest. The employment element of the Hybrid allocation impacts upon how much residential use can be achieved at the site. There is no evidence that high density residential units are attractive in this location.</p> <p>Conclusion: Retain</p>
HS3.2 SHELAA: 19S064	Aspley House, Farington	Farington West	435	Not permissioned. Appeal dismissed.	07/2018/9316/OUT APP/F2360/W/19/3234070	Outline.	<p>Site said to be deliverable between 2029-2038. No detailed planning permission in place.</p> <p>The Site has historically been safeguarded for development but is now proposed for release for housing. A Wainhomes planning application was refused in 2019 for the construction of 100 dwellings on part of this Site. This was dismissed at appeal in 2021. The Site was allocated as Safeguarded Land at the time, and there was no substantive reason for this land to be released. It was also said to compromise the future development of the wider area of land within which the appeal site was located.</p> <p>There is surface water flood risk in the centre of the Site. There is a pressurised water main within the boundary. Sites with a gravity sewer within the boundary.</p> <p>The Site is located south of the Pickerham's Farm strategic site allocation. Some uncertain on delivery rates and what the market can accommodate.</p> <p>Conclusion: Retain but remove from housing land supply</p>
HS3.3 SHELAA: 19S110	Chapel Lane, Longton	Longton & Hutton West	270	Partly permissioned.	Western parcel benefits from planning permission: 07/2022/00928/FUL	Full	<p>Site anticipated to be deliverable between 2028 and 2034.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>Only small parcel at west of the draft allocation benefits from planning permission.</p> <p>There is tree coverable within the centre of the Site, some of which are TPO'd.</p> <p>The land is at risk of sewer and surface water flooding, which UU says needs to be carefully considered through any forthcoming design. There is an associated culvert affecting part of the Site too.</p> <p>Point of access would require some works, and it is not clear whether the Site red line extends to Chapel Lane.</p> <p>Conclusion: Retain but only include 34 units with 5 year housing supply.</p>
SS6 B SHELAA: 19S158/159/160/167 (all to be merged into one site)	Southern area of the major development site at Pickering's Farm	Farington West	545	Not permitted	N/A	N/A	<p>Site anticipated to come forward between 2030/31-2040/41.</p> <p>There are various constraints across the site including surface water flood risk, a Public Right of Way, and TPO'd trees around the north of the Site. The Site is also adjacent to a railway line, which bounds to the east. A setback will be required which will reduce the developable area.</p> <p>The southern extent of the Site is occupied by various dwellings and industrial / farming businesses and buildings.</p> <p>Large areas of the site controlled by Homes and Communities Agency.</p> <p>Conclusion: Retain</p>
HS3.4 SHELAA: 19S162	South of Factory Lane and east of the West Coast Main Line, PR1 9TE	Middleforth and Charnock	250	Part permitted	07/2020/01035/FUL secured in November 2023.	FUL	<p>Site said to be deliverable between 2025 and 2031. The Site is partly within Flood Zone 2 and 3.</p> <p>Permission was obtained in 2023 for the construction of 25 x affordable dwellings. Conditions discharged.</p> <p>There is no evidence of developer interest in the remaining parcel.</p> <p>Conclusion: Retain 250 but only include 25 units in 5 year housing supply.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
SS6 A SHELAA: 19S163	Pickeringham's Farm, Pentwortham, PR1 9TQ	Charnock and Farington West	1,350	Outline permission obtained.	Appeal ref. APP/F2360/W/22/3295498 APP/F2360/W/22/3295502 Planning ref. 07/2021/00886/ORM, 07/2021/00887/ORM	Outline	<p>Despite the site having an existing allocation and planning permission, the Site is anticipated to come forward between 2029 and 2038.</p> <p>The Site holds two outline planning permissions, both of which were originally refused but later allowed at appeal in February 2024. These are for the development of up to 920 dwellings and another for up to 180 dwellings. The applicant was Taylor Wimpey and Homes England.</p> <p>The proposed allocation extends across a larger area than what is covered by these outline permissions. There is no evidence of any additional planning applications on the remainder of the proposed allocation site.</p> <p>There are large areas of TPO'd trees throughout the Site which would require mitigation. There are multiple PROWs which run throughout the site.</p> <p>For this allocation to come forward within the anticipated timescales, 150 units would need to be delivered per year. We understand that 48 dwellings are set to come forward in 2028/29, with 96 units per year thereafter.</p> <p>Conclusion: Retain but remove 150 dwellings from the plan period.</p>
HS3.10 SHELAA: 19S191	Kellet Lane	Bamber Bridge East	60	Not permissioned	N/A	N/A	<p>Site set to come forward 2027 and 2030. There are highways constraints, including poor footways and wider connectivity issues.</p> <p>The Site is within Flood Zone 3b, and so the strategic recommendation was to withdraw this proposed allocation.</p> <p>TPO'd trees site to the southwest of the Site.</p> <p>No planning in place or evidence of developer interest. 60 dwellings is too dense for the site once highways and ecological constraints are factored in. Owned by South Ribble council.</p> <p>Conclusion: Retain but reduce unit numbers to 30 and remove from 5-year housing land supply.</p>
HS3.11 SHELAA: 19S215	South of Factory Lane and east of the West Coast Main Line, PR1 9TE		60	No existing planning permission	N/A	N/A	<p>The Site set to come forward 2027-2032</p> <p>There is a collection of mature trees to the south of the Site, many of which are TPO'd. There is also risk of surface water flooding here.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>The Site looks to be a logical infill Site for housing. In the absence of any planning application, the delivery timescales should be pushed back.</p> <p>Considerable environmental constraints means that achieving 60 units on site would be challenging.</p> <p>Conclusion: Retain 30 dwellings and push back delivery timescales beyond 2031.</p>
HS3.7 HS3.7 SHELAA: 19S232	Land at Branch Road, Mellor Brook	Samplesbury and Walton	120	Screening Opinion obtained.	07/2024/00665/SCE	Full	<p>The Site said to be deliverable between 2027-2031 It was concluded within the scoping opinion the Site would not be subject to an EIA. A planning application has not yet been submitted for this area.</p> <p>There are TPO'd trees in the middle of the site and along the southern border. Some sewer and surface water flood risk.</p> <p>Prospect Homes are progressing the Site.</p> <p>Retain 120 but push back delivery timescales.</p>
HS3.5 SHELAA: 19S249	Land off Church Lane, Farrington	Farrington West	200	Not permissioned.	N/A	N/A	<p>The Site is anticipated to be delivered between 2027 and 2032.</p> <p>There is evidence of surface water flood risk on the Site, and ponds and ordinary watercourses within the boundary.</p> <p>The highways authority commented that access may be difficult given the visibility splays around the trees, existing footway width and land boundary.</p> <p>With no evidence of an active planning application or developer interest in the Site, this Site should be discounted within the 5-year period.</p> <p>Conclusion: Retain 200 units, push back delivery timescale to 2031.</p>
HS3.1 SHELAA: 19S250	Land off Emnie Lane, Leyland	Seven Stars	500	No existing planning permission	N/A	N/A	<p>Site said to be deliverable between 2029 and 2040. The Site is currently allocated as Safeguarded Land. It is located within close proximity to Flood Zone 2 within 50m of Site and Flood Zone 3 within 100m.</p> <p>It is within close proximity to wastewater treatment works which could impact the development prospects (as per SHELAA summary).</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>There are two Grade II listed buildings to the immediate east of the Site.</p> <p>There is no evidence of active planning application.</p> <p>Conclusion: Retain 500 dwellings but remove from 5 year housing supply.</p>
HS3.16 SHELAA: 19S263	Windmill Hotel site, Preston New Road, Mellor Brook	Samlesbury and Walton	10	Not permitted	Appeal APP/F2360/W/22/3306243 dismissed in Feb 2023 07/2024/00074/FUL for the demolition of the vacant public house approved in October 2024		<p>Anticipated delivery 2027-28. No planning permission in place. Demolition of public house implies the site is actively being looked at.</p> <p>Outcome: Retain but remove from 5 year housing supply</p>
HS3.6 SHELAA: 19S331x	Land at Liverpool Road	Hutton	120	Not permitted	N/A	N/A	<p>The Site is anticipated to be delivered 2028-2031 Some surface water flood risk evident.</p> <p>No evident developer interest. Site owned by Lancashire County Council.</p> <p>Conclusion: Retain but remove from 5 year housing supply</p>
HS3.19 SHELAA: 19S334x	Land to the rear of 96-100 Marsh Lane	Longton	5	Not permitted	N/A	N/A	<p>The Site is anticipated to come forward in 2026/27. No evidence of planning application being prepared. This should be discounted off the target.</p> <p>At 108 Marsh Lane, full planning permission was secured in April 2015 for the erection of 3 dwellings as back-land development in a similar fashion as what is envisaged at 96-100 Marsh Lane. This suggests this style of development works in this location and has been accepted by the Council.</p> <p>Conclusion: Retain but remove from 5 year housing land supply</p>
HS3.17 SHELAA: 19S355a	The Brambles Rest Home, Park Avenue	New Longton	10	Not permitted	N/A	N/A	<p>Site anticipated to come forward between 2027/28. The Site is currently in an alternative use as an active care home facility.</p> <p>Access would be via a private shared drive, turning head within would be required.</p> <p>Planning permission for 7 flats was refused in 2018 for a number of reasons relating to inappropriate development in the Green Belt.</p> <p>The Site is also within the Consultation Distance of a major hazard pipeline. An assessment during the determination process indicated that there were sufficient</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							<p>reasons on safety grounds, for advising against the granting of planning permission in this case. Record of sewer flooding within the vicinity.</p> <p>The red line boundary for the Site in the SHELAA is tightly drawn around the care home facility. This may be an error for it is unclear how 10 dwellings could be accommodated on the SHELAA site. Would require the demolition of the care home and the relocation of elderly residents.</p> <p>Conclusion: Discount 10 units.</p>
HS3.13 SHELAA: 19S366	Land south of Bannister Lane, Farington Moss, Leyland, Leyland, PR26 6RU	Farrington West	40	Pending planning application	07/2024/00637/FUL	Full	<p>Site set to come forward between 2027-2029. Existing allocation 'w'.</p> <p>Pending planning application comprising 45 affordable dwellings is currently under consideration.</p> <p>Conclusion: Retain 40 units and add 5, but push to back end of 5 year housing supply period.</p>
HS3.15 SHELAA: 19S367	Land adjacent to the Golden School, Leyland Lane, Leyland, PR25 1QS	Earnshaw Bridge	20	Not permissioned	N/A	N/A	<p>Site anticipated to come forward 2027-2029.</p> <p>Site borders a school to the south; the site is not part of the school grounds and comprises concrete former playing pitches and cleared brownfield land.</p> <p>Records of sewer flooding in the vicinity, and some risk of surface water flood risk.</p> <p>There is no evidence of developer interest or forthcoming planning application.</p> <p>Conclusion: Retain 20 units but remove from five-year supply.</p>
HS3.12 SHELAA: SRBC005	Land off Brownedge Road/Railway Sidings	Bamber Bridge East	60	Not permissioned	N/A	N/A	<p>The Site is said to be deliverable between 2027-2029. Existing allocation 'T' - the site has long been allocated which suggests there is no market interest in this site. With the BNG regime now in place, this site is even less attractive.</p> <p>The Site currently consists of dense mature tree coverage. Constraints relating to biodiversity net gain and ecology.</p> <p>There is a railway line running directly to the south of the Site.</p> <p>In the absence of any developer interest or evidence to suggest otherwise, the development constraints here deem the site undeliverable.</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
							Conclusion: Discount 60 units
HS3.14 SHELAA: SRBC010	Gas Holders Site (Morris Homes) (aka Land off Wateringpool Lane)	Walton-le-Dale West	25	Planning obtained subject to S106	07/2018/9534/FUL	Full	<p>Site set to come forward 2027-2029.</p> <p>A planning application for 22 dwellings was submitted in 2018. The last update on the application was in 2021. Given the significant lapse in time, this application is not considered active.</p> <p>As a legacy allocation 'DD', the site has been allocated for development for a long time without interest. This suggests it is not attractive to the market. However, the wider area is not characterised by residential use and therefore it is envisioned that this brownfield site should come forward at some point. However, there may be ground contamination issues.</p> <p>With no active planning application or developer interest, the site should be discounted from the 5-year timescale.</p> <p>Conclusion: Retain 25 but remove from 5-year delivery timeframe.</p>
Project completions on non-allocated existing commitments at 1st of April 2024 (over 50 units)							
07/2023/00430/FUL	Land adj to Civic Centre, West Paddock (Jubilee Gardens)	Broadfield	75		07/2023/00430/FUL		<p>Adopted allocation 'e'. Full permission secured for 75 apartments.</p> <p>Conclusion: Retain</p>
Northern Section) (Homes England/Keepmoat Homes - Farington Mews) - note, two permissions treated as one for monitoring purposes due to approved phase boundaries (Phase 1) And Land between Heatherleigh and Moss Ln, aka Croston Rd/Sth of Bannister Ln, aka Croston Rd Sth, aka Rear of 2 Leyland Ln - 420 Croston Rd north of Heatherleigh - North of Sthern Section (The Pastures - Tilia Homes - formerly Kier Homes)		Farington West	384	Permission and under construction	07/2020/00552/FUL (for 121 dwellings) determined in Dec 2020. And 07/2020/00544/REM (for 399 dwellings) determined in Dec 2020. And 07/2019/2313/REM (174 units) determined in June 2019	Full	<p>Adopted allocation 'w' for 600 units. 136 units completed to date, with 384 remaining.</p> <p>07/2020/00552/FUL implemented and partly constructed. Phase 2 which is yet to come forward is for 194 units (dwg no. 03 Rev P).</p> <p>Outcome: Retain</p>

Site Reference	Site Address	Ward	No. of Units	Planning Status	Planning Application Reference	Planning Permission Type	Stantec Assessment and Commentary
Vernon Carus Site/Penwortham Mills, Factory Ln excl Sumpster Horse Site (Phase 1b) / (Phases 2&3)		Middleforth/Walton-le-Dale West	301		07/2020/01034/ORM (120 full / 181 outline) / 07/2024/00296/VAR / 07/2024/00368/VAR		Conditions are being discharged in relation to Lidl element of the permission, though no start has been made on site. There Council state 144 units will be delivered by 2029 with 157 thereafter. No evidence that residential element is set to come forward. Outcome: Retain
07/2022/00106/REM	Moss Side Test Track, Leyland	Leyland	950	Site is permissioned and is under construction	07/2017/3361/ORM 07/2022/00106/REM	Outline Reserved Matters	The Site is said to be deliverable from 2024 and 2031. Outline permission was obtained in 2019 for the development of between 653 and 753 units. A reserved matters application then approved in 2022 for the construction of 743 dwellings Development has commenced on Site. Conclusion: Retain
07/2018/1674/REM 07/2023/00493/REM / 07/2023/00718/REM 07/2021/01247/REM	Land between Altcar Lane and Show Brook Road		234		07/2018/1674/REM 07/2023/00493/REM / 07/2023/00718/REM 07/2021/01247/REM		Conditions are being discharged in relation to Lidl element of the permission, though no start has been made on site. There Council state 144 units will be delivered by 2029 with 157 thereafter. No evidence that residential element is set to come forward. Conclusions: Retain
07/2015/0315/REM	Lostock Hall Gas Works, Leyland Road		76		07/2015/0315/REM		Adopted allocation 'K'. Construction underway. Outcome: Retain



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