

Land north of Hoghton Lane, Coupe Green

Proposed allocation for residential development

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

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[REDACTED]



/1 INTRODUCTION

- 1.1. PWA Planning has been commissioned to prepare representations in relation to a parcel of land north of Hoghton Lane, Coupe Green. The aim of the representations is to demonstrate that the site is suitable for residential development with a view to it being allocated for housing in the Central Lancashire Local Plan.

- 1.2. The Three Central Lancashire Authorities are currently undertaking a consultation on the preparation of a Joint Local Plan for Central Lancashire including Chorley Borough Council, South Ribble Borough Council, and Preston City Council, as part of the Regulation 19 consultation. The consultation process is running until midnight on Monday 14th April 2025. As part of this consultation it has been identified that there is a significant shortfall in the proposed allocations in the Draft Plan which currently only cover 80% of the identified housing need for the authorities. PWA are promoting a series of sites to be considered for allocation for development in the emerging Local Plan. This Statement covers one of these sites.

- 1.3. This document intends to provide an overview of the site and further illustrate why the site should be taken forward and allocated for development within the Local Plan period.



/2 THE SITE

Introduction

- 2.1. The site is approximately 5ha and is located to the north of Hoghton Lane, Coupe Green. The site has the potential to develop land with up to 125no. residential dwellings. The site location is detailed in Figure 1 below.



Figure 1 – Approximate Site Extent shown edged in red (Source: Google Earth)

- 2.2. The site is sustainably located, lying adjacent to the existing built-up area of the village and within walking distance of local services. This ensures that future residents will be well-connected and have access to day-to-day facilities.
- 2.3. In physical terms, the site is well-contained by existing development and landscape features. This containment ensures that development here would not lead to sprawl or an unacceptable loss of rural character.
- 2.4. Allocating the site for housing would contribute to meeting identified shortfalls in a sustainable, plan-led manner, while preventing future speculative development elsewhere.



/3 CENTRAL LANCASHIRE DRAFT LOCAL PLAN

- 3.1. As part of the consultation process, we have reviewed the Draft Plan and have provided representations under separate cover. In relation to the sites and the representations we have made it is thought that additional allocations in Preston City Council should be welcomed. A summary of the representations is provided below.

Spatial Vision

- 3.2. PWA agrees with and broadly supports the vision for sustainable growth outlined in the Plan. However, the vision is not supported by the land use allocations which are contained within the Plan, [REDACTED] of quantum of development which will be delivered or the spatial location of the proposed allocations.
- 3.3. [REDACTED] The plan must go further in addressing the region's housing shortfall, ensuring that policies actively promote housing delivery rather than restrict it.
- 3.4. This is particularly relevant given that the authorities are seeking to take advantage of the transitional provisions provided at Annex 1 Paragraph 234(a) of the Framework and so do not propose to meet the full local housing needs and seeks examination of the plan against the requirements of the previous Framework. It is acknowledged that under these provisions, the housing requirement must be no less than 80% of local housing need. The plan indicates a housing requirement which meets these provisions. The plan needs to be able to demonstrate that it then makes sufficient land use allocations to ensure that these requirements are achieved. Indeed, when the housing requirement is below the actual need, it is even more crucial that the proposed land use allocations included in the draft plan have been fully assessed for deliverability. The loss of even a modest number of sites would mean that actual delivery would likely fall well below 80% of local housing need and thus further compound the lack of supply of new homes.
- 3.5. PWA is aware that some of the sites proposed for allocation are constrained by access and other technical / ownership issues which will likely prevent development. The degree of rigour of the allocation process, particularly in considering the technical constraints, appears to be limited. This suggests that the authorities will be unable to meet the required 80% detailed within the plan which brings clear questions as to its soundness. Planning for the



bare minimum is neither in the best interests of Central Lancashire, nor does it align with the NPPF which seeks to boost the supply of housing.

- 3.6. In our opinion additional land use allocations, particularly for new housing, are required to ensure the plan remains sound and can ensure delivery of at least 80% of the local housing need is achieved in housing within the Local Plan area.
- 3.7. The Plan supports economic growth and employment, particularly in relation to town centres, strategic employment sites, and investment in infrastructure. However, this is not always clearly linked to the need for corresponding housing growth. The economic projections published as part of the evidence base for the plan indicate a much higher level of housing should be planned for, particularly when you factor in the National Cyber Force HQ development. These alone indicate a greater level of housing should be planned for, asides for the questions on the deliverability of some of the sites the authorities are currently relying on within the plan period.
- 3.8. Moreover, the lack of a full Green Belt review and the failure to allocate enough new housing sites suggest that growth is being **constrained rather than maximised**. This approach conflicts with current and previous versions of the Framework.
- 3.9. The plan promotes sustainable development, with housing growth in locations where trips can be made through sustainable modes of transport. Paragraph 2.2 and 2.9 recognise this, particularly in light of the role the new Local Plan can have in achieving climate resilience at a local level. However, it is questionable as to whether the current distribution of development achieves this. Little attention has been paid to smaller settlements which often have a variety of services of facilities within them, where suitable allocations would allow future residents to access such facilities and services generally on foot, in a more sustainable manner than some of the larger strategic sites the authorities are relying upon.

Strategic Objectives

- 3.10. Strategic Objective 3 'Sustainable Communities' should be reworded to ensure that the key focus is around ensuring that the policies of the plan help to deliver a sufficient supply of homes and to support the Government's objective of significantly boosting the supply of homes (NPPF 2024 Para 61). The objective should expressly indicate a desire to boost the



supply of new homes, as a clearer indication of the Councils' intentions to support economic growth and ensure adequate homes are available to meet all needs.

- 3.11. Similarly, Strategic Objective 4 on Economic Prosperity should be revised to emphasise the intrinsic link between economic success and adequate housing provision. PWA argues that employment growth must be matched by a diverse and sufficient housing supply in order to attract and retain skilled workers, reduce commuting pressures, and ensure long-term economic sustainability. Housing and economic objectives should be pursued in tandem, reflecting evidence in the Housing Need Statement which confirms the requirement for each authority to meet its own housing need.

Spatial Strategy [REDACTED]

- 3.12. PWA considers the proposed spatial strategy to be insufficient in supporting sustainable growth, noting that [REDACTED] allocates land for only 80% of the identified housing need, which risks undermining both economic development and housing affordability.
- 3.13. PWA feels the spatial strategy does not go far enough in supporting growth. Despite acknowledging the need for housing, the plan includes a housing requirement which is around 80% of the local housing need and hence then allocates land to meet this requirement. This approach limits opportunities for both economic expansion and housing affordability.
- 3.14. Not only does the Plan not align with the revised NPPF 2024, which the transitional provisions allow for, it fails to meet the objectives of significantly boosting the supply of housing delivery, which were enshrined in the earlier version of the Framework. Policy SS1 (Development Patterns) fails to allocate sufficient land to meet housing needs in full, instead relying on previously allocated sites with no substantial new allocations. The spatial strategy does not provide flexibility should existing allocations fail to deliver, increasing the risk of housing shortages.
- 3.15. The NPPF 2024 clarifies that Green Belt boundaries can be reviewed where housing needs cannot otherwise be met. Notwithstanding the transitional provisions, it is considered a significant missed opportunity that the draft plan does not undertake a proper Green Belt review, which limits opportunities for sustainable development and fails to explore all



reasonable options for meeting housing needs. **Policy SS2** (Settlement Hierarchy) places too much reliance on urban areas like North West Preston while failing to consider sustainable Green Belt releases that could better distribute growth.

- 3.16. To address these issues, PWA recommends increasing housing allocations to fully meet local needs and carrying out a full Green Belt review. These actions are essential given the clear shortfalls anticipated in the plans housing delivery.

Balanced Housing Growth Market (Chapter 4)

- 3.1 Policy HS1 does not align with the requirement to significantly boost housing supply in NPPF. The policy acknowledges the need for new housing but only seeks to meet 80% of the identified housing requirement, which is wholly insufficient. NPPF 62 states that local plans should meet as much housing need as possible. By not planning to fully meet local housing needs, the policy exacerbates affordability issues and limits the economic potential of Central Lancashire. Furthermore, there is no flexibility built into the policy, if existing allocations underdeliver, there is no clear mechanism to release additional sites, creating a risk of persistent undersupply.
- 3.17. To make Policy HS1 sound, PWA recommends increasing housing allocations to fully meet Local Housing Need (LHN), building in flexibility to release additional sites if needed and allocating the site at land north of Hoghton Lane for housing. Specifically this would mean adding this site to allocations with Policy HS3.

Summary

- 3.18. In summary, PWA submits that the Draft Plan, while making positive steps toward supporting economic growth, does not go far enough in addressing the pressing need for housing delivery in accordance with the NPPF. The proposed approach, allocating only 80% of the identified housing need, is likely to fall significantly in delivering the number of houses across the plan period.
- 3.19. A failure to fully meet housing need not only risks worsening affordability and constraining economic growth, but also places undue reliance on a limited number of existing sites, with little flexibility should these fail to come forward.



3.20. Strategic Objectives should be revised to reflect the fundamental link between housing delivery and sustainable economic development, ensuring that the Plan clearly prioritises meeting local housing needs.

3.21. The land north of Houghton Lane represents a logical and deliverable solution to help meet Preston’s unmet housing need. Its allocation would support the objectives of the NPPF, help deliver a more balanced spatial strategy, and respond to the evolving character of the local area. PWA urges the Council to positively consider additional housing allocations, including the land north of Hoghton Lane, to ensure the soundness of the Plan and deliver genuinely sustainable growth for the region.

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/4 PROPOSED SITE ALLOCATION

- 4.1. As demonstrated by the preceding text, the site has the potential to deliver in the region of 125 new homes. No environmental or technical issues have been identified which would preclude residential use. In short, the site is suitable, available and deliverable, and would comprise an appropriate housing allocation.
- 4.2. Bringing this site forward for housing allocation would result in a number of beneficial planning outcomes. Firstly, it would support the sustainable growth of Coupe Green by ensuring that the village continues to thrive and maintain the critical mass necessary to support local services and infrastructure. Small and medium-sized housing developments on the edge of rural settlements, such as this, are widely acknowledged in national policy as important contributors to housing supply and rural vitality.
- 4.3. Secondly, allocating the site would directly assist in addressing the Central Lancashire authorities' significant housing shortfall. With the current draft Local Plan only proposing to allocate sites to meet 80% of the local housing need,
- 4.4. Finally, reallocating this site to residential use would help to ensure the emerging Local Plan is both sound and legally compliant. It would reflect the requirements of the National Planning Policy Framework to significantly boost the supply of homes, plan positively to meet development needs, and provide a range of sites in sustainable locations. In doing so, the allocation of this site would strike an appropriate balance between protecting the countryside and meeting the pressing need for housing in Central Lancashire.



/5 CONCLUSIONS

- 5.1. As demonstrated in the supporting assessment work for this document, the site has the potential to deliver approximately 125 new homes to contribute to the housing supply for Preston, with no environmental or technical issues identified which would preclude residential use.
- 5.2. Collectively, it is considered the site can be considered to contribute towards sustainable development, ensuring development continues to take place in a well-planned manner, adjacent to existing settlements where demand exist. The site therefore is considered to represent an appropriate location for development for the following reasons:
- ██████████
- The site is located sustainably close to existing services, notably public transport;
 - The site is not subject to any national or local designations which would prevent its development; ██████████
 - The landowners are willing and ready to see the site developed and hence the site is available to provide land for housing in the short to medium term; and
 - There are no known technical or environmental constraints which would preclude its development for housing as represented by the supporting technical documents submitted with these representations.
- 5.5 It is requested that the site be considered for allocation for housing in this stage of the Local Plan process.



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