

Central Lancashire Local Plan Publication Version Soundness Representations

Bloor Homes

14 April 2025

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Contents

1.0	Introduction	1
	Test of Soundness	1
	Structure	2
2.0	Policy SS1 (Development Patterns)	4
	Introduction	4
	Consideration of Policy	4
	Tests of Soundness	7
	Recommended Changes	7
3.0	Policy SS2 (Settlement Hierarchy)	8
	Introduction	8
	Consideration of Policy	8
	Tests of Soundness	9
	Recommended Changes	9
4.0	Policy HS1 (Strategic Policy)	10
	Introduction	10
	Consideration of Policy	10
	Tests of Soundness	18
	Recommended Changes	19
5.0	Policy HS2 (Housing Allocations Chorley)	20
	Introduction	20
	Consideration of Policy	20
	Tests of Soundness	28
	Recommended Changes	28
6.0	Policy HS6 (Housing Mix and Density)	31
	Introduction	31
	Consideration of Policy	31
	Tests of Soundness	32

	Recommended Changes	32
7.0	Policy HS7 (Affordable Housing)	34
	Introduction	34
	Consideration of Policy	34
	Tests of Soundness	38
	Recommended Changes	38
8.0	Policy ID2 (Developer Contributions and Planning Obligations)	39
	Introduction	39
	Consideration of Policy	39
	Recommended Changes	39
9.0	Conclusion	41

1.0 Introduction

- 1.1 Lichfields is appointed by Bloor Homes [Bloor] to prepare detailed soundness representations on strategic matters relating to the emerging Central Lancashire Local Plan [CLLP]. The CLLP sets out how development will be planned and delivered across the combined area of Central Lancashire from the period from 2023 to 2041. The three local authorities involved in the production of the CLLP are Preston, Chorley and South Ribble. The Regulation 19 Publication Version of the CLLP and its associated evidence base was published on 24 February 2025. A consultation period on the CLLP will run to 14 April 2025.
- 1.2 Although these representations are prepared on behalf of Bloor, they represent Lichfields' professional and independent work. Lichfields has extensive experience and knowledge of planning applications, appeals and policy across Central Lancashire. Lichfields has secured several major permissions across Central Lancashire in recent years. Our technical expertise and local experience mean that we are well placed to provide analysis of the CLLP and its associated evidence.
- 1.3 It is important to note that Bloor welcomes the advancement of the CLLP, and the efforts made by the three Councils in producing the evidence base that supports the document. It is imperative that the three Central Lancashire authorities adopt a Development Plan which accords with national policy as quickly as possible, to ensure that the correct level of housing and economic growth is provided to meet future needs in a sustainable manner. Despite this, Bloor has soundness concerns with the CLLP as currently proposed.
- 1.4 The CLLP has reached Regulation 19 Publication stage. It is Central Lancashire's intention that this version of the CLLP will be submitted to the Secretary of State [SoS] for formal examination by the Planning Inspectorate. These representations will focus on assessing each relevant policy against the test of soundness set out in national policy. The representations will also focus on the draft policies contained within the CLLP and assess the relevant elements of the evidence base which seek to underpin the soundness of each policy.

Test of Soundness

- 1.5 There is a statutory requirement for every Development Plan Document [DPD] to be submitted for independent examination to assess if it is 'sound' and whether other statutory requirements have been satisfied. Local Planning Authorities [LPAs] must have regard to several matters including national policies and guidance issued by the SoS, including the National Planning Policy Framework [the NPPF].
- 1.6 The revised NPPF, published in December 2024, includes transitional arrangements for the purposes of plan-making. NPPF paragraphs 234-235 sets out that plans reaching Regulation 19 stage on or before 12 March 2025 shall be examined under the relevant previous version of the NPPF. The CLLP is therefore examined under the 2023 version of the NPPF. All paragraph references to the NPPF from this point onwards relate to the 2023 version, unless explicitly stated.

- 1.7 Case law¹ from 2024 held that the Planning Practice Guidance [PPG] has the same legal status as the NPPF, as they are both expressions of Government policy. There are no transitional arrangements covering the PPG for the purposes of plan-making. The PPG was most recently updated in February 2025 and is referred to throughout these representations.
- 1.8 There is no statutory definition of soundness. Paragraph 35 of the NPPF does however state that plans are sound if they are:
- a **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; 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.*
- 1.9 Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
- 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 areas⁶, 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 area⁷; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 1.10 These representations will assess the soundness of policies within the CLLP in accordance with the NPPF.
- ## Structure
- 1.11 The remainder of this report provides an assessment of the soundness of the following CLLP policies and provides a series of recommended changes to each policy in turn:

¹ Mead Realisations Limited v Secretary of State for Levelling Up Housing and Communities [2024 EWHC279]

- Policy SS1 (Development Patterns);
- Policy SS2 (Settlement Hierarchy);
- Policy HS1 (Strategic Policy);
- Policy HS2 (Housing Allocations Chorley);
- Policy HS6 (Housing Mix and Density);
- Policy HS7 (Affordable Housing); and,
- Policy ID2 (Developer Contributions and Planning Obligations).

1.12

These representations conclude that the above policies do not meet the test of soundness and provides a summary of the changes that, in our view, need to be implemented for the CLLP to be found sound.

2.0 Policy SS1 (Development Patterns)

Introduction

- 2.1 Policy SS1 (Development Patterns) requires new housing, employment and commercial growth to be focused on the most sustainable locations. Policy SS1 seeks to retain the existing Green Belt in Central Lancashire “*to prevent urban sprawl by keeping land permanently open*”. Policy SS1 also states that new development will be focused within settlement boundaries and on allocated sites as shown on the Policies Map.
- 2.2 Policy SS1 states that outside of settlement boundaries, allocated sites, and the Green Belt, the remaining land will be regarded as open countryside. Development in the open countryside to enable limited rural housing, support agriculture, the local rural economy and recreation will be supported “*where it is appropriate to a rural area.*”

Consideration of Policy

- 2.3 Policy SS1 directs development in Central Lancashire to within settlement boundaries (through the development of windfall sites) and on allocated sites.
- 2.4 The Green Belt Planning Practice Guidance [PPG] was first published in July 2019 and last updated in February 2025. The PPG² is clear that the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process. Meeting development needs represents an instance where the alteration of Green Belt boundaries is necessary.
- 2.5 For the reasons set out below, and in the assessment of Policy HS2 (Housing Allocations Chorley), we consider that relying on the current draft allocations and windfall sites will be insufficient to meet the housing requirement across Central Lancashire.
- 2.6 Policy SS1 is a restrictive policy focused primarily on not releasing Green Belt, rather than allocating sufficient and suitably located sites to form a sustainable pattern of development.

Windfall Sites

- 2.7 The CLLP housing requirement is 23,652 over the plan period. The CLLP makes significant allowances for windfalls in the claimed supply. In total, the CLLP makes a 3,139 windfall allowance across the plan period (13.3% of the requirement). This comprises 1,489 units in Chorley (24.8% of Chorley’s requirement), 1,650 units in South Ribble (19.9% of South Ribble’s requirement), and no windfall allowance in Preston. The Central Lancashire Strategic Housing and Economic Land Availability Assessment 2025 [the SHELAA] provides details of how the windfall allowance has been calculated.
- 2.8 The NPPF defines windfall sites as “*sites not specifically identified in the development plan*”. The NPPF states that where an allowance is to be made for windfall sites as part of an anticipated supply, there should be “*compelling evidence that they will provide a reliable source of supply*” [§72]. Paragraph 72 of the NPPF confirms that any allowance should be “*realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.*”

² Reference ID: 64-001-20250225

- 2.9 The SHELAA provides a summary of the windfall completions in Chorley from 2010-2024. This summary states that the average net total windfall completions over this period was 140 dpa. This total was split across 63 dpa on small windfall sites (1-9 units) and 77 dpa on large windfall sites (10+ units). For completeness, this summary is repeated below.

Figure 2.1 Chorley Windfall Completions 2010-2024

Chorley Windfall Completions 2010-2024			
Monitoring Period	Net completions on small windfall site (1-9 dwellings)	Net completions on large windfall site (10+ dwellings)	Total windfall completions (net)
April 2010 – March 2011	54	173	227
April 2011 – March 2012	52	231	283
April 2012 – March 2013	54	13	67
April 2013 – March 2014	93	17	110
April 2014 – March 2015	81	-1	80
April 2015 – March 2016	66	28	94
April 2016 – March 2017	70	23	93
April 2017 – March 2018	56	95	151
April 2018 – March 2019	52	98	150
April 2019 – March 2020	82	111	193
April 2020 – March 2021	52	60	112
April 2021 – March 2022	47	56	103
April 2022 – March 2023	61	82	143
April 2023 – March 2024	62	89	151
Average	63	77	140
Median	59	71	128

Source: Central Lancashire Strategic Housing and Economic Land Availability Assessment (SHELAA)

Large Windfall Sites

- 2.10 Completions on large windfall sites varied significantly over this period, from -1 to 231 dwellings. Large windfall sites have not provided a 'reliable source' of housing supply in Chorley over the last 14-year period. Moreover, the net completions on large windfall sites (10+ dwellings) saw a marked fall between April 2012 to March 2017. Over this period, the average delivery from these sites was 13.3 dpa. The Central Lancashire Core Strategy was adopted in July 2012. Windfall delivery on large sites may have fallen in this period as a result of a recently adopted local plan. Outside of this period, delivery on large windfall sites increased significantly. This is likely the result of an increase in speculative applications on land not allocated for development as the policies in the Core Strategy relating to housing became out-of-date. The windfall delivery has therefore been artificially inflated outside of the 2012-2017 period. Using average delivery over the period 2010-2024 is therefore a fundamentally flawed approach as windfall delivery over this period has been influenced by the aforementioned trends.
- 2.11 Furthermore, the Central Lancashire Core Strategy (2012) set a housing requirement of 417 dpa for Chorley which was the housing requirement derived from the North West Regional Strategy requirement (2008). The Chorley Local Plan was adopted in 2015 and did not set a housing requirement instead relying on the Core Strategy to set the housing requirement. The Standard Method for calculating housing need was introduced in 2018, meaning that Chorley has never had a local plan housing requirement based on the Standard Method for calculating housing need.

2.12 Chorley's latest Five-Year Housing Land Supply Statement (2024) claims a housing land supply equivalent to 2.9-years, based on an annual requirement of 506 dpa. Under the new standard method [SM3], Chorley's annual housing requirement would increase to 564 dpa, further worsening the Council's housing land supply position. Chorley's inability to demonstrate a five-year housing land supply, coupled with an out-of-date local plan, has artificially inflated Chorley's windfall delivery in recent monitoring years. This trend will not continue once an up-to-date plan is adopted and so inflated delivery on large windfall sites in previous years is not robust evidence of their future reliability.

2.13 It is expected that once the CLLP is adopted, there will be a fall in windfall delivery on large sites (10+ dwellings). Large windfall sites in Chorley have not provided a consistent level of housing completions historically and the evidence base has failed to demonstrate that historic delivery rates translate to a reliable source of supply in the future, as required by paragraph 72 of the NPPF.

Small Windfall Sites

2.14 The SHELAA also sets out what it states to be expected future trends. The SHELAA identifies completions as having come from a range of sources, including new build developments on brown and greenfield land, conversions and change of use developments.

2.15 The SHELAA states that new build windfall completions on greenfield land are generally infill development and that it is expected that such development will continue to come forward, and a policy on infill development be included in the CLLP. Draft CLLP Policy EN15 (Areas of Green Belt) does refer to limited infilling in villages or on previously developed land. However, this policy does not provide any further support than that provided by existing national (NPPF Paragraph 154) and local policy (Central Lancashire Core Strategy 2012 Policy 1: Locating Growth).

2.16 The SHELAA anticipates that opportunities for brownfield development for both small and large sites will continue to arise as such sites become redundant and available for redevelopment over the plan period. The most deliverable, viable and sustainable sites are likely to have already come forward or to have been allocated for development by the draft CLLP. There are typically more site-specific constraints associated with brownfield sites meaning that many require grant funding to overcome viability issues. Brownfield sites therefore do not provide a reliable source of windfalls that can be relied upon.

2.17 The SHELAA expects completions from change of use and conversions to continue and provide a reliable source of windfall development. Permitted development rights were expanded under the coalition Government and again under the Conservative Government in 2021, making it easier to convert existing buildings into one or more residential units. As with brownfield land, the most deliverable, sustainable and appropriate buildings are likely to have already been subject to conversion to residential uses. As the most appropriate sites have already come forward for residential development, we expect that the number of conversions and change of uses will reduce. The Council's approach of continuing to rely on conversions and change of use applications for windfall development over the plan period is flawed.

2.18 The CLLP includes small site windfall allowances from year 2 of the plan period after adoption (2027/2028). Windfall sites are not planned for and therefore do not already

have planning permission. Due to lead in times associated with planning decisions and the time taken for land to become available, it is widely accepted that windfall allowances should not be included until year 3 of the plan period after adoption (i.e., 2028/2029).

Tests of Soundness

2.19 Bloor considers that Policy SS1 is unsound and will not meet the tests of soundness for the following reasons:

- 1 **It is not positively prepared:** Policy SS1 directs new development to allocated sites and windfall development within settlement boundaries. Policy SS1 uses existing Green Belt boundaries to drive its spatial strategy, rather than considering the most appropriate strategy to meet Central Lancashire's needs. We consider that the land which has been allocated for development and land within the existing settlement boundaries are insufficient to meet the objectively assessed housing need.
- 2 **It is not justified:** Proportionate evidence has not been provided to justify directing development towards the allocated sites and within settlement boundaries. Several of the allocated sites in Chorley are not considered developable (discussed in further detail in Section 5.0). Policy SS1 also fails to consider Green Belt sites in sustainable locations as an appropriate alternative strategy. No compelling evidence that windfall sites within existing settlement boundaries will provide a reliable source of housing supply has been provided.
- 3 **It is not effective:** Policy SS1 directs development to allocated sites and sites within existing settlement boundaries. We have concerns on the deliverability of this approach. This land is likely to be insufficient to meet the housing needs of Chorley.
- 4 **It is not consistent with national policy:** Insufficient land has been allocated to meet housing needs as required by paragraph 11 of the NPPF. No compelling evidence has been provided to suggest that windfall sites within settlement boundaries will provide a source of housing supply in accordance with paragraph 72 of the NPPF.

Recommended Changes

2.20 Chorley's windfall allowance should be reduced significantly, and additional land should be allocated for residential development in Chorley to meet the borough's housing needs.

2.21 Amending Green Belt boundaries should be considered as a reasonable alternative scenario for meeting Chorley's housing needs. Following the review of Green Belt boundaries, sustainably located Green Belt and grey belt sites adjacent to existing Key Service Centres and Urban Local Centres, which make a poor contribution to the purposes of including land in the Green Belt (as set out in paragraph 143 of the NPPF) should be allocated for development and included within the settlement boundaries.

2.22 Allocation of suitable Green Belt and grey belt sites would provide a reliable source of housing land and minimise the impact of development on the Green Belt from speculative applications in the future.

3.0 **Policy SS2 (Settlement Hierarchy)**

Introduction

- 3.1 CLLP Policy SS2 (Settlement Hierarchy) sets out the settlement hierarchy, which identifies the scale and location of development growth across Central Lancashire that supporting investment should reflect.
- 3.2 Policy SS2 states that the Preston Urban Area (Tier 1) will be the primary focus for development growth and investment, and the largest amount of new development will be directed here. This will be delivered through a combination of redevelopment and regeneration activity and major new development to meet strategic needs.
- 3.3 Policy SS2 also states that Key Service Centres (Tier 2), including the towns of Leyland and Chorley and the South Ribble Urban Area will be the secondary focus for development. This will be delivered through allocated sites in and adjoining the towns, windfall sites and town centre renewal activity to meet development needs.
- 3.4 Policy SS2 states that Urban Local Service Centres, including Coppull, will be a tertiary focus for development and accommodate new development and investment within settlement boundaries. However, some of the Urban Local Service Centres in Chorley are shrink wrapped by Green Belt which has largely been untouched since its inception in 1979. Therefore, the ability of these settlements to accommodate additional development within their settlement boundaries is significantly constrained.

Consideration of Policy

- 3.5 CLLP Policy SS2 seeks to direct the largest amount of new development to the Preston Urban Area, delivered through a combination of major new development to meet strategic needs, redevelopment and regeneration activity.
- 3.6 The CLLP identifies four key strategic sites for residential development (Policies SS3-SS6). Three of these sites are located on land adjoining the urban area of Preston (Policies SS3-SS5), with a claimed supply of 4,917 homes. The fourth key strategic site is in South Ribble and already benefits from a planning permission. There are no strategic sites proposed in Chorley to meet future development needs.
- 3.7 The allocation of major new development sites to meet strategic needs and regeneration projects is welcome. Whilst Bloor has no concerns over the developability of the key strategic sites, the complexities associated with large strategic sites often leads to long lead-in times and delays to housing delivery. The three strategic sites in Preston, taken together with the other housing allocations across Preston, amount to a claimed supply of 7,859 dwellings. The SHELAA states that 2,310 of these dwellings are expected to be delivered beyond the plan period, highlighting the long lead-in times associated with key strategic sites.
- 3.8 Over-reliance on large strategic sites to meet housing needs, particularly in the short term, could impact plan delivery in the short to medium term. It is important that the plan also identifies sufficiently diverse sources of land for housing, which is available and capable of delivering in the short-medium term.

- 3.9 The CLLP is overly reliant on a small number of key strategic sites in Preston to deliver its housing need. It would be more effective to distribute development by amending Green Belt boundaries to allocate land in other sustainable locations for residential development across Central Lancashire. This would identify suitable sites that can come forward in the short term to meet Chorley's housing need and spread development across the plan area and creating a more diverse typology of site which can deliver units in the short term whilst the larger strategic sites are progressing.
- 3.10 In addition to key strategic sites, Policy SS2 relies on sites within Preston City Centre for housing delivery. Bloor recognises the importance of regeneration projects to deliver social, environmental and economic benefits, including housing delivery. Policy SS2 is reliant on regeneration projects to deliver housing in Preston City-Centre. There are significant viability constraints associated with brownfield development, with grant funding likely to be required to bring forward sites. The most viable sites are likely to have already come forward for development.
- 3.11 As a result of viability pressures, regeneration schemes are often not able to deliver policy compliant levels of affordable housing. The development of greenfield sites in higher value and sustainable settlements are more likely to be viable and deliver affordable housing.

Tests of Soundness

- 3.12 Bloor considers that Policy SS2 is unsound and will not meet the tests of soundness for the following reasons:
- 1 **It is not positively prepared:** The CLLP is overly reliant on a few key strategic sites in Preston to meet development needs. Coupled with the significant reliance on windfall sites as explained in our response to SS1, the approach is not positively prepared. Development should be directed to other sustainable settlements across the plan area to ensure Central Lancashire's short-medium term needs are met.
 - 2 **It is not justified:** Directing the majority of development to Preston and relying on four strategic sites to deliver a large proportion of housing supply is not an appropriate strategy particularly as there are no strategic sites being proposed in the borough of Chorley despite market and affordable housing need, in addition to existing housing market stress. The CLLP has failed to consider the release of Green Belt land as a reasonable alternative.

Recommended Changes

- 3.13 Green Belt boundaries should be reviewed, and additional land should be allocated for residential development in sustainable locations surrounding Key Service Centres and Urban Local Service Centres particularly in Chorley. This will distribute development across Central Lancashire and ensure that sufficient land is allocated to meeting housing needs, including affordable and family housing, in Chorley in the short to medium term.

4.0 Policy HS1 (Strategic Policy)

Introduction

4.1 Policy HS1 (Strategic Policy) sets out the housing requirement for Central Lancashire over the plan period 2031-2041 and states how new homes and infrastructure will be delivered. It also provides an indication of the intended distribution of development across the three council areas. In short, the Policy identifies a housing requirement for Central Lancashire of 23,652 homes over 18 years, at an annual average of 1,314 homes.

4.2 It is distributed across the three council areas as follows:

- Chorley Council area: 6,012 homes / 334 dwellings per annum [dpa];
- Preston City Council area: 9,360 homes / 520 dpa; and
- South Ribble Borough Council area: 8,280 homes / 460 dpa.

Consideration of Policy

4.3 Policy HS1 states that the CLLP will provide for 23,652 net additional dwellings between 2023 and 2041. This is equivalent to 1,314 dpa. This is above the collective Standard Methodology figure of 988 dpa, which the supporting text makes clear has the potential to make travel patterns in Central Lancashire less sustainable by increasing inter-district commuting:

“This indicates that simply adopting the collective standard method requirement of 988 dpa would not pass the tests of soundness required, especially given the City Deal agreement that Preston and South Ribble are signatories to.” [paragraph 4.14]

4.4 The CLLP goes on to state that its housing requirement is based on an employment-led scenario (Commuting Ratio 1-to-1) taken from DLP’s ‘Central Lancashire Housing Study Update’ [HO9]. This modelled a range of scenarios including a preferred scenario based on Cambridge Econometrics’ employment forecasts for the area, which the CLLP claims ensures that each Central Lancashire authority will provide sufficient growth in its resident workforce so that the total growth in employed people is matched on a one-to-one basis by growth in workers resident in each authority area.

4.5 The CLLP goes on to state that the resultant need from this employment-led scenario, at 1,237 dpa, is higher than the Standard Methodology’s 988 dpa minimum starting point, and that the employment-led approach provides the basis of the CLLP housing requirement because it:

- *“Aligns housing need with anticipated job growth.*
- *Reinforces sustainable patterns of commuting.*
- *Reflects market signals and previous rates of delivery.” [after paragraph 4.15]*

4.6 The CLLP then clarifies how the 1,314 dpa housing requirement has ultimately been derived:

“Following publication of the revised NPPF in December 2024, the annual housing requirement for Central Lancashire has been increased slightly to 1,314 dpa in order to

achieve 80% of the LHN using the new standard method formula, in accordance with the transitional arrangements. The additional 77 dpa has been distributed between the three authorities.” [paragraph 4.19]

- 4.7 We welcome the Councils’ initial recognition that, in accordance with the NPPF (2023) paragraph 61, there are exceptional circumstances that justify an alternative approach to assessing housing need.
- 4.8 However, we have fundamental concerns regarding how this new requirement has been identified, and whether it is sufficient to adequately address the three considerations set out in the bullets above.
- 4.9 In the first instance, the Councils make it crystal clear that the main motivation for choosing the figure of 1,314 dpa is because this equates to exactly 80% of the revised standard methodology figure of 1,643 dpa across the three districts. As per paragraph 234a of the December 2024 NPPF, where the plan has reached Regulation 19 stage on or before 12th March 2025, and its draft housing requirement meets at least 80% of local housing need calculated under the new stock-based standard methodology, then the plan will be examined under the relevant previous version of the NPPF.
- 4.10 The 1,314 dpa figure has therefore been chosen in order to meet the 2024 NPPF’s 80% transitional arrangements loophole, rather than any other consideration. This does not appear to be either in the spirit of the new Governments drive to deliver 1.5 million new homes over the course of this parliament, nor can we see anywhere in the previous version of the PPG where this fulfils the necessary ‘exceptional circumstances’ case justifying a departure from the previous version of the standard methodology.
- 4.11 Turning to the Councils’ more detailed justification for departing from the LHN, the CLLP states that it has followed an employment led approach because it aligns housing need with jobs growth; it reinforces sustainable patterns of commuting; and it reflects market signals and previous rates of delivery. We examine each of these considerations below.

Alignment of housing need with anticipated job growth

- 4.12 By departing from the SM2 figure of 988 dpa the Councils are acknowledging that exceptional circumstances exist to justify an alternative approach, based on economic growth projections. We welcome the attempt to align housing need with economic growth objectives as this conforms with the NPPF (December 2023) [§81c], which states that planning policies should “*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*”. **This retains the link between integrating economic growth and housing need.** There is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment.
- 4.13 The Councils’ view is that the figure of 1,237 dpa aligns housing need with anticipated job growth, based on evidence contained within DPP’s Central Lancashire Housing Study Update (December 2024). That document modelled a number of scenarios including an ‘Employment-led’ projection (with a commuting ratio of 1:1). This was based on using the latest economic activity rates data derived from the 2021 Census alongside jobs growth

forecasting data from Cambridge Econometrics [CE] and a 1:1 commuting ratio. This totals 894 jobs per annum over the period 2023-2041.

4.14 The jobs growth figure is also modelled in another key evidence base document for the CLLP, BE Group’s *Central Lancashire Employment Land Study and OAN Update 2024* (February 2025, ref: ER6). This provides a revised and updated Objectively Assessed Needs [OAN] exercise to reflect a different forecast period for the emerging CLLP, 2023-2041, changing macro-economic conditions, updated forecast methodologies and the latest population projections for Central Lancashire.

4.15 Document ER6 ran three forecasting models:

- **Model 1: Historic Land Take-Up:** reviewed the actual take-up of employment land in the local authority area over a period of time;
- **Model 2: Labour Demand:** econometric forecasts which use a model that projects the likely jobs growth in different industry sectors. This scenario used as its base the latest economic forecasts (winter 2023/2024), produced by CE for LCC and covering the Central Lancashire sub-region;
- **Model 3: Labour Supply:** a variation on Model 2, this uses the same method of forecasting as the Labour Demand method but takes forecast changes in the working population i.e., labour supply, rather than jobs – labour demand. It uses as its base, a scenario of population change and economic activity rates derived from the 2021 Census. This scenario aligns with the preferred LHN of 1,237 dpa in DLP’s Housing Study Update.

4.16 Document ER6 concludes that Central Lancashire’s OAN for employment land is **172.87 ha**, split 18.24 ha for office and the remaining 154.63 ha for industrial / warehousing uses, justified as follows:

Table 4.1 Recommended OAN for Office and Industrial/Warehousing land in Central Lancashire

Use	LA Area	OAN Figure, in hectares	Assumptions Applied
Office	Chorley	6.48	Labour Demand , net of homeworking Inclusive of Buffer equating to an extra 5 years
	Preston	6.00	
	South Ribble	5.76	
	Central Lancs	18.24	
Industrial / Warehouse	Chorley	34.97	Baseline in the Take Up modelling , Net of Losses, for Industrial/Warehouse Uses only = 19.61 ha A further Buffer of 5 years is applied on the Baseline figure An additional 9.35 ha is included to achieve a vacancy rate of 7.5 percent and give greater choice for businesses
	Preston	68.43	Baseline in the Take Up modelling , Gross of Losses (to provide allowance for the scale of industrial/warehouse losses recorded), for Industrial/Warehouse Uses only = 44.80 ha A further Buffer of 5 years is applied on the Baseline figure An additional 11.79 ha is included to achieve a vacancy rate of 7.5 percent and give greater choice for businesses
	South Ribble	51.23	Baseline in the Take Up modelling , Net of Losses, for Industrial/Warehouse Uses only = 27.29 ha A further Buffer of 5 years is applied on the Baseline figure An additional 16.67 ha is included to achieve a vacancy rate of

Use	LA Area	OAN Figure, in hectares	Assumptions Applied
			7.5 percent and give greater choice for businesses
	Central Lancs	154.63	

Source: BE Group (February 2025): Central Lancashire Employment Land Study and OAN Update 2024, Tables 24 and 25

4.17 This Table is taken forward in the CLLP in Policy EC1, which states that over the Plan period, provision will be made for a minimum of 173 ha of employment land to support both local and wider strategic employment needs.

4.18 However, whilst it is true that DLP has modelled CE job forecasts in its Housing Study Update assessment to come to a need figure of 1,237 dpa, and whilst BE Group modelled the CE forecasts in its Employment Land Study as two of its core scenarios, this does not mean that the CLLP’s housing and employment policies are aligned. In fact, they are fundamentally misaligned.

4.19 To recap, the Council’s housing OAN is underpinned by DLP’s figure of 1,237 dpa, generated by the CE employment forecasts and uplifted slightly to meet 80% of the new SM3 housing target. Policy EC1: Scale of Economic Growth identifies a requirement of 173 ha of employment land, based on BE Group’s evidence. But crucially, as we can see from Table 4.1, this figure is only aligned with the CE forecasts for the office needs; for industrial and warehousing requirements BE Group used a completely different projection, based on past take up.

4.20 **Why does this matter? It matters because the 173 ha employment land target does not align with the CE projection and if, as expected, the majority of such land comes forward for development by 2041 it will undoubtedly accommodate far higher levels of employment than could be sustained by either 1,237 dpa or 1,314 dpa.**

4.21 We know this because BE Group clearly demonstrates such an outcome in ER6. The key data is extracted in Table 4.2 overleaf, which compares and contrasts BE Group’s employment land modelling scenarios³.

³ Based on data within ER6, it is understood that their adjustments for vacancy and a margin of choice amount to an uplift to the base industrial and warehousing figures of 15.36 ha for Chorley; 23.63 ha for Preston, and 23.94 ha for South Ribble. For office uses, the same upward adjustments from the base figures are 1.38 ha for Chorley, 1.2 ha for Preston, and 1.16 ha for South Ribble. We understand that they have been applied on a consistent basis to all three scenarios.

Table 4.2 Comparison of Employment Land Scenarios (ha)

Use	LA Area	Past Take Up	CE Labour Demand	Labour Supply (Employment led CR 1-1)
Total Jobs	Central Lancs	Unspecified	16,660 (926 p.a.)	16,098 (894 p.a.)
Office	Chorley	-2.38	6.48	5.98
	Preston	3.99	6.00	4.80
	South Ribble	8.83	5.76	4.16
	Central Lancs	10.44	18.24	14.94
Industrial / Warehouse	Chorley	34.97	14.76	19.86
	Preston	68.43	22.53	26.93
	South Ribble	51.23	21.14	31.44
	Central Lancs	154.63	58.43	78.23

Source: BE Group (February 2025): Central Lancashire Employment Land Study and OAN Update 2024, Tables 22 and 25. Cells in Green identify the scenarios that have been taken forward by the Councils in their CLLP

- 4.22 At a basic level, there is clearly an issue with how the Councils’ housing and employment land evidence bases are aligned. The housing evidence of 1,237 dpa is based on a net job growth of 894 p.a., which equates to the Labour Supply employment land scenario. This was not taken forward by either BE Group or the Central Lancashire authorities. They preferred to identify an OAN of 18.24 ha of office land, which was based on the CE Labour demand model.
- 4.23 More importantly, we can see that the Councils’ emerging Local Plan is also based on an industrial/warehousing land requirement of 154.63 ha, which is almost double the level that could be justified under the Labour Supply scenario, and 165% higher than the figure generated by the Labour Demand scenario.
- 4.24 This was chosen by BE Group because:
“Labour Demand model forecasts negative or negligible land needs in the industrial sector which is at odds with identified market demand and the almost exclusively industrial pipeline of development identified on local employment sites” [paragraph 5.17].
- 4.25 **Therefore, the Councils’ own evidence suggests that they are planning for a level of employment land growth, at 173 ha, that is 80 ha above the level that could be justified under its Labour Supply scenario of 93.17 ha** (which underpins its housing target), and 96 ha greater than the 76.67 ha justified under its Labour Demand scenario.
- 4.26 Unhelpfully, BE Group’s Employment Land Study and OAN Update did not model the job growth implications of delivering 173 ha, but we can be sure that providing at least 80 ha of office, industrial and warehousing land above the level justified by its housing OAN of 1,237 dpa, will have a very significant impact on net job creation.
- 4.27 Bloor accepts that the derivation of housing need from employment land targets is a complex issue and not all of employment land need will necessarily be associated with job growth. However, the 80 ha disparity between the scale of job growth that could be sustained by 1,237 dpa (and, by extension, 1,314 dpa) and the employment land OAN figure of 173 ha is excessive.
- 4.28 Bloor is of the view that to address this misalignment, the Councils should plan for a much higher level of housing growth that is more closely aligned with past trend job growth and their employment land ambitions. There remains a clear disconnect between the

employment land evidence and housing evidence which could lead to unsustainable outcomes including increased inward commuting and an exacerbation of the issues being experienced in the housing market.

Reinforces sustainable patterns of commuting

4.29 The CLLP states that one of the motivations for increasing the housing target from 988 dpa was because using the Standard Method LHN figure had the potential “*to make travel patterns in Central Lancashire less sustainable by increasing inter-district commuting*” [paragraph 4.14]. As such, the 1,237 dpa figure is based on an **equalisation of commuting patterns**, as summarised in the Housing Study Update as follows:

“In developing the employment-led scenario, a commuting ratio sensitivity has also been applied (as in the Housing Study 2022). This sensitivity applies an adjustment to the Census-based commuting ratio in each year of the forecast so that future jobs growth is provided under a 1:1 commuting ratio. This means that for every new job created in each district it is assumed that there is a resident worker available to fill it and so there is no absolute change in levels of in-commuting or out-commuting. The 1:1 employment-led scenario principally affects the location of homes relative to jobs in Central Lancashire by seeking to provide homes closer to workplace locations in accordance with the principles of the Standard Method.

As economic activity rates are forecast to increase in the future, this means that in principle the dwelling-equivalent figures for the employment-led scenarios could support higher jobs growth than indicated by the forecast.” [paragraphs 0.13-0.14]

4.30 In basic terms, this has the effect of reducing the number of homes required across Central Lancashire as a whole, from 1,275 dpa to 1,237 dpa (see Table 15 of the Housing Study Update). It also radically rebalances the distribution of housing need away from Chorley and South Ribble, towards Preston.

4.31 There are a number of problems with this approach. Firstly, by artificially reducing the housing target from 1,275 dpa to 1,237 dpa by balancing commuting, whilst relying on an employment land target that (as we have demonstrated above) is far in excess of the level justified by either the labour demand or labour supply modelling, then the perverse result of actually increasing net in commuting is likely to occur. Fewer households will be able to live in the three districts and will have to commute in from outside the HMA, resulting in a less sustainable outcome.

4.32 Secondly, it is beyond the gift of the three Councils to ensure that “*for every new job created in each district there is a resident worker available to fill it*” – the Councils cannot control who moves into the new homes. It is usually accepted that demographic modelling should seek to replicate existing commuting patterns rather than attempt to artificially distort the modelling to suppress housing need.

4.33 Thirdly, the Councils’ preferred outcome, of shifting housing need to Preston and to a lesser extent South Ribble at the expense of Chorley, could actually result in less sustainable commuting patterns than currently.

4.34 As can be seen in Table 4.3, the CCLP would actually drive down Chorley’s housing target to just 334 dpa, which is below even the 410 dpa DLP suggests would be necessary to have a

balanced commuting ratio. This risks increasing commuting from Preston and South Ribble into Chorley to take up work opportunities as the local labour force is artificially constrained.

Table 4.3 Dwellings per Year – Comparison of Scenarios

	Chorley	Preston	South Ribble	TOTAL
Employment led	479	378	417	1,274
Employment-led (CR 1-1)	410	441	386	1,237
CLLP Policy HS1 distribution	334	520	460	1,314

Source: DLP (2024): *Central Lancashire Housing Study Update* Table 16 / Draft CLLP (February 2025)

Reflects market signals and previous rates of delivery

4.35 The CLLP argues that the 1,237 dpa LHN provides a suitable basis for its housing requirement, partly on the grounds that it reflects market signals and previous rates of housing delivery. This is justified in DLP’s Housing Study Update as follows:

“Whilst the overall need identified under this scenario is slightly lower than recent dwelling completion rates, it more closely aligns with average recent completions figures than any of the other tested scenarios. It also continues to align closely with the existing Core Strategy requirement for each authority that was previously tested and found sound at examination.” [5.22]

4.36 When one actually reviews levels of delivery, it is clear that this is not the case - 1,237 dpa / 1,314 dpa are nowhere near the level of housing that have been delivered in recent years, particularly in Preston. Based on data contained within MHCLG Live Table 122:

- Central Lancashire 15-year average (to 2023/24): 1,374 dpa;
- Central Lancashire 10-year average (to 2023/24): 1,650 dpa;
- Central Lancashire 5-year average (to 2023/24): 1,920 dpa;

4.37 These figures are significantly higher than the housing target in the emerging CLLP; furthermore, the latest housing delivery figure for the three districts in 2023/24 is recorded by MHCLG at 2,500 dwellings net (up from 2,418 dwellings the year previously), which is 90% higher than the proposed housing target. This suggests that the three Central Lancashire authorities are planning for a very substantial reduction in housing delivery than current trends would suggest is justified.

Other Issues

4.38 There are a number of other concerns that Bloor has concerning Policy HS1, including:

- **No adjustment for meeting Older and specialist Housing Needs:** The arc4 Housing Demand and Need Assessments undertaken for each of the LPAs separately identify high levels of need for older persons accommodation (with Chorley alone needing as many as 3,405 additional units of accommodation for older people by 2041 including 2,648 C3 dwellings (sheltered/ leasehold retirement dwellings); 655 C2 Extra Care dwellings; and 103 C2 residential care bedspaces). However, no adjustment to the housing target has been made to address the issue. This is despite a recommendation

by DLP in its Housing Study Update for the Councils to consider their needs when determining the housing need for each area:

“Once this housing need figure has been agreed it will then be for the Central Lancashire authorities to determine how much of the overall need can be accommodated within Central Lancashire, and whether each district can accommodate its own need in full, before determining the housing requirement(s) for the plan area and each individual authority area. It is recommended that an updated assessment of the size, type, and tenure of housing needed for different groups in Central Lancashire is considered as part of this process and used to inform policy-based decisions about the amount of housing to be planned for in each district.”

[paragraphs 0.26 and 0.27]

No provision is made in the CLLP to meet any of the C2 needs, which would need to be on top of the LHN.

- **The decision to backload housing need in Chorley:** As set out in paragraph 4.20 of the CLLP and illustrated in Appendix 3, Chorley’s housing requirement is:

“stepped over the plan period to take account of low delivery rates in the earlier years of the plan. Delivery is expected to start to increase upon adoption of the plan as new allocations become available for development. The requirement has been stepped from 280 dpa in the first 3 years of the plan period (2023/24 to 2025/26) increasing to 345 dpa from 2026/27 onwards i.e. from the point of anticipated adoption”.

- Bloor is of the view that this decision is flawed – backloading the housing requirement to the later years of the plan period is the antithesis of being positively prepared and seeking to boost the supply of housing land. Furthermore, by backloading the housing requirement, it is likely that the uplift will never materialise because the next plan will require alignment with standard method 3 which will enforce a higher housing requirement and Chorley will not electively seek to uplift their future requirement to address previous under delivery.
- **Redistributing housing need away from Chorley towards Preston:** The supporting text to Policy HS1 states that a redistribution of the three identified housing requirements has been applied in Policy HS1 to *“reflect the spatial strategy drivers identified above to promote housing and related growth in the most sustainable locations and to enable existing commitments to come forward”*. It has the effect of reducing Chorley’s SM3 need from 451 dpa (discounted by 20%) to just 334 dpa (a 26% reduction), whilst increasing Preston’s housing target from 472 dpa to 520 dpa, and South Ribble’s from 391 dpa to 460 dpa.
- Bloor strongly disputes that this is an appropriate approach to take. Chorley is already the most expensive part of Central Lancashire, with median house prices at £205,000 compared to £197,000 in South Ribble and as low as £158,000 in Preston. Median wages in Chorley (£29,778) are broadly in line with Preston’s (£29,626) and well below those of South Ribble (£33,241), meaning that the affordability ratio in Chorley is comfortably the highest in the sub-region at 6.88 compared to 5.93 in South Ribble and 5.33 in Preston⁴. The inevitable outcome of suppressing housing targets in the most

⁴ ONS (2025): Median house price / Median Wages / Median Affordability Ratios by local authority district, England and Wales, year ending September 1997 to year ending September 2023 (£)

desirable residential area of Central Lancashire whilst also backloading its delivery will inevitably lead to higher house prices in Chorley, worsening affordability yet further.

- **Bringing empty homes back into use:** Table 3 in Appendix 1 of the Central Lancashire Housing Study Update summarises the modelling methodology used to calculate the LHN. Paragraph 2.32 and Table 3 indicate that Edge Analytics actually reduced the level of vacancy between 2021 and 2031, fixing it thereafter:

“The relationship between households and dwellings is modelled using a conversion factor derived from the 2011 and 2021 Censuses, using statistics on households (occupied household spaces) and dwellings (shared and unshared) (Table 3). The 2021 Census ‘vacancy’ rate is applied in 2021 and is then incrementally adjusted to return to the 2011 Census rate by 2031, fixed thereafter”.

Table 3: Household to Dwelling Conversion Factors

Area	2011	2021
Chorley	96.05	95.73
Preston	95.40	93.78
South Ribble	96.64	96.03

Source: ONS

- There is no justification for this elsewhere in the report or the CLLP, but it nevertheless has the effect of reducing the amount of new dwellings required as vacant homes are brought back into productive use.
- Unhelpfully there are no workings in the *Housing Study Update* to allow us to calculate the precise impact this has on the 1,237 dpa figure, but if Edge Analytics’ vacancy rate assumptions are applied to the 2014-based household projections (pro rata’d from 2039 to 2041) and compared with the net increase in dwellings if the vacancy rate had been kept constant between 2023 and 2041 instead of being reduced, we can get a flavour of the scale of impact this has. Table 4.4 indicates that Edge Analytics’ assumptions artificially reduce the level of housing need, by 1,386 dwellings overall. The level of need would have been 944 dwellings higher in Preston alone under this scenario had vacancy rates been held constant over time.

Table 4.4 Impact of Reducing Vacancy Levels 2023-41

	Chorley	Preston	South Ribble	TOTAL
Dwellings (vacancy reduced by 2041)	+7,253	+3,723	+2,480	+13,456
Dwellings (constant vacancy rate)	+7,423	+4,667	+2,752	+14,842
Difference	+170	+944	+272	+1,386

Source: Lichfields’ analysis

Tests of Soundness

4.39

Bloor considers that the housing requirement in Policy HS1 is unsound and will not meet the tests of soundness for the following reasons:

- 1 **It is not positively prepared:** The strategy used to derive Central Lancashire’s housing need does not meet the objectively assessed need of the three districts. It does

not align with the Councils' employment land requirements, does not meet the needs of different groups of the community, redistributes housing away from the more desirable parts of the sub-region and features modelling inputs that assume empty homes will reduce over time, which is unsubstantiated. The proposed housing requirement has been set at the minimum permitted under the transitional arrangements rather than meeting the housing needs of the authorities. This is the antithesis of what national planning policy is trying to achieve.

- 2 **It is not justified:** The uplift from 1,237 dpa to 1,314 dpa is a cynical adjustment unsubstantiated by any evidence, and has been implemented with the sole intention of avoiding the need to plan for the much higher SM3 figure of 1,643 dpa.
- 3 **It is not effective:** The housing requirement will fail to deliver the economic objectives for Central Lancashire and risks unsustainable levels of in commuting to the three districts. The policy will fail to meet the housing needs of different groups of the community because they have not been robustly assessed by the Council in policy terms.
- 4 **It is not consistent with national policy:** The Council's evidence base is misaligned and therefore is not in accordance with either the NPPF or the PPG.

Recommended Changes

4.40 Any housing requirement needs to be stated 'as a minimum', as the NPPF (2023) paragraph 11b) states:

"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".

4.41 Robust evidence should be prepared by the Council that meets the requirements of the NPPF and PPG. This evidence should include a robust assessment of how to align the housing requirement with the economic growth aspirations, as well as demonstrating that the decision to divert housing away from Chorley will not lead to worsening affordability issues. It must also take account of the contextual issues in Central Lancashire, including the affordable housing need and needs of other groups of the community, such as older persons housing.

4.42 We consider that, as a minimum, the housing requirement should be revisited to understand the scale of housing needed to accommodate the additional labour force associated with 173 ha of employment land over the plan period. This is likely to generate a level of job growth well in excess of the 16,600 modelled by CE and will require a suitable increase to the housing target. This may well be closer to the level of housing need identified by the new Government under SM3 (1,643 dpa).

5.0 Policy HS2 (Housing Allocations Chorley)

Introduction

5.1 Policy HS2 (Housing Allocations Chorley) of the Central Lancashire Local Plan (2023-2041) allocates and protects 37 sites within Chorley Borough Council for housing development. The 37 allocations amount to a total area of 140.39 hectares and allocates land for 2,721 dwellings. This is equivalent to 11.5% of Central Lancashire’s claimed housing requirement of 23,652 to be delivered in the Local Plan period between 2023 and 2041.

Consideration of Policy

5.2 Lichfields has undertaken a detailed analysis of the 21 site allocations with a claimed capacity of 40 or more dwellings included in Policy HS2. This analysis has identified several key issues with the Council’s claimed supply from these allocations.

5.3 Paragraph 69 of the NPPF states that planning policies should 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 adoption³⁵; 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.

5.4 Annex 2 of the NPPF states:

“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.”

5.5 From our detailed assessment, we conclude that six of the allocations in Policy HS2 cannot be considered developable as defined by the NPPF. The removal of these six allocations reduces the cumulative capacity across the Policy HS2 allocations by 668 dwellings. A breakdown of this is provide in Table 5.1 below.

5.6 For each of the six disputed draft allocations, we set out our evidence below.

Table 5.1 Sites Allocated for Residential Development by CLLP Policy HS2 with a Capacity over 40 Dwellings

Allocation Reference	CLLP Capacity	Lichfields Capacity Analysis			
		Years 1-5	Years 6-10	Years 11-15	Total
HS2.1	92		92		92
HS2.2	137	69	68		137
HS2.5	40				0
HS2.8	117	76	41		117
HS2.10	150				0
HS2.11	246				0
HS2.12	62		62		62

HS2.14	201	201			201
HS2.16	332	70	150	112	332
HS2.17	115	115			115
HS2.18	67	67			67
HS2.20	118	118			118
HS2.24	66	66			66
HS2.25	100		100		100
HS2.26	41		41		41
HS2.27	55	55			55
HS2.33	40	40			40
HS2.34	55				0
HS2.35	289	200	89		289
HS2.36	102				0
HS2.37	75				0
HS2 (Sites over 40 dwellings) Total	2,500				1832

Source: Lichfields Analysis

- 5.7 In addition to the disputed sites discussed below, a significant proportion of dwellings allocated for residential development by Policy HS2 already benefit from planning permission. The appropriateness of this is also discussed in further detail below.
- 5.8 Paragraph 5.4 of the SHELAA sets out a trajectory of the anticipated housing delivery over the plan period. For reference this is repeated below.

Figure 5.1 Potential SHELAA Housing Supply over the Plan Period

Central Lancashire Authority	Potential SHELAA Housing Supply over Plan Period (dwellings)			
	Pre-adoption 2023-2026	0-5 years from adoption 2026-2031	5-10 years from adoption 2031-2036	10-15 years from adoption 2036-2041
Chorley	219	1,404	1,702	118
Preston	168	1,173	2,102	2,106
South Ribble	25	1,888	1,730	805
TOTAL	412	4,465	5,534	3,029

Source: Central Lancashire Strategic Housing and Economic Land Availability Assessment

- 5.9 The SHELAA identifies that a significant proportion of housing delivery in Central Lancashire will be front-loaded in the first 10-years from adoption of the plan. This will result in a significant reduction of supply in the last five years of the plan period. For Chorley, delivery from SHELAA sites is expected to fall to just 118 units (23.6 dpa) in the five-year period to 2041.

Draft Allocation HS2.5 (Babylon Lane, Adlington)

- 5.10 Land at Babylon Lane, Adlington (ref. HS2.5) is allocated for the development of up to 40 dwellings by the draft CLLP. An application for outline planning permission for 40 dwellings on the site (ref. 23/00510/OUTMAJ) was dismissed at appeal on 10 May 2024 (ref. 3329702) following non-determination of the application by Chorley Borough Council.

In dismissing the appeal, the Inspector concluded that the scheme would result in inappropriate development in a flood risk area [§51]. Areas within the site, including along the line of the culvert, and Babylon Lane are at high risk of surface water flooding. The Inspector's Report concludes that development on the site will exacerbate existing flooding in the area [§17-18].

- 5.11 The dismissed appeal clearly sets out the Inspector's view that the site is not a suitable location for housing development, owing to its risk of flooding. As a result of the dismissed appeal and flood risk issues on the site, it is not a suitable allocation to include in the CLLP. A sequential approach should be applied to the allocation of sites, which prioritises sites that are at lower risk from flooding. The SHELAA provides commentary on the flood risk at the site but provides no evidence to suggest that the reason for refusal can be overcome.
- 5.12 Owing to flood risk issues, the site is not in a suitable location for residential development. The site therefore does not meet the definition of developable as set out in the NPPF and should be removed as an allocation from the CLLP.

Draft Allocation HS2.10 (Little Knowley Farm, Chorley)

- 5.13 Land at Little Knowley Farm, Chorley (ref. HS2.10) is allocated for the development of up to 200 dwellings by the draft CLLP. An application for outline planning permission (ref. 22/00538/OUTMAJ) for the erection of up to 200 dwellings on the site was withdrawn by the applicant (Castle Green Homes) on 14 February 2024. This application was subject to 158 public comments, the vast majority of which were objections to the proposals.
- 5.14 On land adjacent to the site, an application for outline planning permission (21/00253/OUTMAJ) for the erection of up to 130 dwellings was dismissed at appeal on 1 December 2023 (ref. 3314846). The Inspector found that large-scale housing development at the site would be greatly at odds with the prevailing more pastoral and natural surrounds of this part of the countryside [§10]. The Inspector concludes that the proposal would result in considerable harm to the character and appearance of the area [§21]. We can only conclude that the original application on this site was withdrawn for fear of receiving a similar reason for refusal on this site.
- 5.15 The draft allocation, as an adjacent site, is subject to similar landscape constraints. A Public Right of Way which runs through the site means that it would be particularly sensitive to landscape harm arising from residential development. Indeed, the application for residential development on the site was withdrawn two months following the dismissed appeal.
- 5.16 For the reasons set out above and in the Inspector's Report on the adjacent site, the draft allocation is considered to be inappropriate for residential development by virtue of the landscape harm that would arise. The draft allocation is therefore not in a suitable location for housing development and as such does not meet the definition of developable as set out in the NPPF.
- 5.17 Notwithstanding the above, the claimed supply of 150 dwellings appears to be derived from the withdrawn application. The draft allocation includes approximately half of the withdrawn application site. The capacity of the site is therefore more likely to be 100 dwellings than the stated 150 dwellings. Regardless, as set out above, the site is not considered developable in any case.

- 5.18 As the draft allocation does not meet the definition of developable, all 150 units have been removed from the CLLP's claimed supply.

Draft Allocation HS2.11 (Great Knowley, Chorley)

- 5.19 Great Knowley, Chorley (ref. HS2.11) is allocated for the development of up to 246 dwellings. Appendix 4 of the CLLP (Housing Allocations – Key Development Considerations) provides additional information on the allocation. The draft allocation is bound by the Leeds and Liverpool Canal to the west and beyond this the Grade II Listed Botany Bay Mill. The site slopes significantly from east to west towards the canal, leading to prominent views of Botany Bay from Blackburn Brown in the east.
- 5.20 Appendix 4 states that a Heritage Impact Assessment has been prepared which identifies that development on the site would have a “*significant impact on the setting*” of the Grade II Listed Botany Bay Mill and non-designated Knowley Farm.
- 5.21 The NPPF requires harm to heritage assets to be weighed against public benefits arising from a proposal (§207-208). The Historic Environment PPG is clear that public benefits could be anything that delivers economic, social or environmental objectives described in the NPPF, including the delivery of homes. The draft allocation would therefore give rise to public benefits that any future decision maker would need to weigh against the “*significant impact on the setting*” of nearby heritage assets.
- 5.22 This housing delivery could however be delivered on any other allocated site, or across multiple other allocated sites, which would not give rise to a significant impact on heritage assets and are therefore preferential. On that basis, the site is not considered to be a suitable allocation for residential development in accordance with the requirements of the NPPF. All 246 units in the CLLP's supply should therefore be removed and reallocated to preferential sites which would not have a significant impact on the setting of a nearby heritage asset.

Draft Allocation HS2.36 (West of M61 – Land adjacent to Delph Way)

- 5.23 Land adjacent to Delph Way, Whittle-le-Woods (ref. HS2.36) is allocated for the development of up to 102 dwellings by the draft CLLP. The draft allocation is located on the eastern edge of Whittle-le-Woods. The draft allocation slopes significantly down towards the River Lowstock on the south-eastern boundary. The River Lowstock and its banks are within Flood Zones 2 and 3. To the north, the site is bound by a Public Right of Way, woodland and a landfill.
- 5.24 The CLLP states that suitable vehicular access ‘should be achievable’ from Delph Way/Cross Keys Drive. These roads are single lane estate roads which lead to a series of shared private driveways. These roads do not appear to be suitable access points for an additional 130 dwellings and associated movements. It appears that there are no alternative access options to the site. Considering poor access arrangements, the site does not appear appropriate for this level of residential development.
- 5.25 The CLLP states that concerns have been raised from local residents regarding potential land contamination from the adjacent landfill. The Environment Agency have advised that there is a possibility that contamination from the adjacent landfill has migrated via

groundwater. The CLLP confirms that the potential number of residential units on the site might have to be reduced should mitigation measures be necessary to protect controlled waters and human health. In the absence of reports which confirm that the site is safe for residential development, there are serious concerns over the developability of the draft allocation.

- 5.26 The challenging topography of the draft allocation acts as a constraint to development and brings into question the developability of the site. Furthermore, the site is considered to make a positive contribution to the landscape setting of the area. The development of the site would likely give rise to harm to the landscape. Existing residential dwellings on Delph Way and Cross Keys Drive, and users of the Public Right of Way to the north of the site would be particularly sensitive to this harm as a result of the surrounding topography.
- 5.27 There are several constraints associated with this draft allocation, including challenging topography, risk of contamination, unsuitable access arrangements and the potential for landscape harm. For a myriad of reasons, the issues with this draft allocation represent a considerable constraint to residential development. The site is therefore not considered to be in a suitable location for development and as such does not meet the definition of developable as set out in the NPPF. Accordingly, all 102 dwellings should be removed from the CLLP's supply.

Draft Allocation HS2.37 (Hill Top Farm, Whittle-le-Woods)

- 5.28 Hill Top Farm, Whittle-le-Woods (ref. HS2.37) is allocated for the development of up to 75 dwellings by the draft CLLP. An application for outline planning permission (ref. 23/00727/OUT) was submitted on 31 August 2023 and is currently pending determination. Despite the passage of time, it is not clear why the application has not been determined but we can only assume that there are technical issues with the site or the application.
- 5.29 It is proposed that the draft allocation will be accessed from Hill Top Lane, a single-lane country road. There are no existing pedestrian footways within the proximity of the site on Hill Top Lane. The existing access appears to be unsuitable for residential development of 75 dwellings. This is exacerbated by the adjacent draft allocation (ref. HS2.35) which has a claimed capacity of 55 dwellings and would also be accessed from Hill Top Lane. Indeed, Lancashire County Council's Highways Officers have objected to the live application on the site, stating that the proposals would have a detrimental impact on highway safety in the immediate vicinity of the site and should be refused on highway safety and sustainability issues (LCC Highways Response dated 3 November 2023). LCC Highways' Response dated 21 June 2024 confirms that none of the concerns raised in its previous response had been addressed by revised information. The live application is subject to objections from over 40 residents and Councillors on highways grounds.
- 5.30 Notwithstanding the access constraints to the site, the site has a challenging topography which represents a constraint to residential development. Furthermore, the Central Lancashire SHELAA (January 2025) identifies that the landfill is located approximately 250m away from the adjacent quarry and infilled ponds which have the potential to give rise to contamination issues.
- 5.31 The site is not considered to be in a suitable location for residential development whilst no solution has been found to achieve suitable access arrangements. This is demonstrated by

LCC Highways’ objection to a live application for residential development. The draft allocation therefore does not currently meet the definition of developable as set out in the NPPF. All 75 units should be removed from the CLLP’s claimed supply.

Draft Allocation HS2.34 (West of M61 – Land North of Hill Top Farm)

- 5.32 Land North of Hill Top Farm (ref. HS2.34) is allocated for the development of up to 55 dwellings by the draft CLLP. This draft allocation is located adjacent to the draft allocation at Hill Top Farm (ref. HS2.37). A request for a screening opinion for EIA development was submitted to Chorley Council in relation to the draft allocation. The Council subsequently confirmed that they did not consider that an EIA was required in this circumstance.
- 5.33 As set out in the above assessment of draft allocation HS2.37, there are significant concerns associated with access arrangements to the site which have led us to conclude that the site is not in a suitable location for residential development. Draft allocation HS2.34 is subject to the same access issues and is therefore also in an unsuitable location for residential development. As with the adjacent draft allocation, land north of Hill Top Farm does not meet the definition of developable and all 55 units should be removed from the CLLP’s claimed supply.

Sites Benefitting from Planning Permission

- 5.34 Several Policy HS2 allocations benefit from planning permission and will have achieved, or be approaching, first completions on site by the time the plan is adopted. The below table sets out the allocations which benefit from existing planning permissions or resolutions to grant planning permission.

Table 5.2

Allocation ref.	Planning History	Comments	Claimed Capacity
HS2.2	22/00631/FULMAJ - Erection of 137no. dwellings, of which 30% will be affordable, together with associated roads, car parking and landscaping works.	Resolution to grant planning permission (December 2023) subject to s.106 Agreement. Decision Notice not yet issued.	137
HS2.8	21/00327/FULMAJ - Erection of 76no. affordable dwellings with access, parking, landscaping and all other associated works (including pumping station).	Application refused 24.6.22. Subsequently allowed at appeal (ref. 3313413) on 5.5.23. Discharge of condition applications (including pre-occupation conditions) and s.73 application submitted / approved.	40*
HS2.14	16/00804/FULMAJ - Full application for the erection of 201 dwellings, associated access, drainage and the provision of public open space and landscaping.	Application refused 29.6.20. Subsequently allowed at appeal (ref. 3265785) 7.6.21. Discharge of condition applications and NMA applications submitted /	201*

Allocation ref.	Planning History	Comments	Claimed Capacity
		approved. Clear evidence of development having commenced on satellite imagery. Units may be delivered before plan adopted.	
HS2.16	22/00576/FULMAJ - Erection of 70no. market and affordable dwellings with associated access, pumping station and open space following demolition of the existing buildings.	Application approved 26.2.25. s.73 application (submitted by a different developer) pending determination.	332 (70 dwellings have permission)
HS2.17	20/00377/FULMAJ - Erection of 115 dwellings with associated parking, landscaping, drainage, pump station, layout of roads and footways and other associated works.	Application refused 9.10.20. Subsequently allowed at appeal (ref. 3272623) dated 25.11.21. S.73 application (submitted by a different developer) approved 20.11.24. Several NMAs and DOCs approved.	115*
HS2.18	21/01076/FULMAJ - Demolition of existing dwelling and erection of 67no. dwellings (including 30% affordable housing) with associated access, car parking and landscaping.	Approved 17.6.24. Several NMAs and DOCs approved.	67
HS2.20	23/00780/REMMAJ - 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	RM Application approved 9.2.24. Outline Planning Permission refused 13.4.21. Subsequently allowed at appeal (ref. 3275691) 3.2.22. Several DOCs (including pre-occupation conditions) and NMAs approved pursuant to both the outline and RM.	118*
HS2.24	22/00748/REMMAJ - Reserved matters application detailing appearance, landscaping, layout and scale, pursuant to outline planning permission 20/01331/OUTMAJ	RM Approved 16.6.23. Outline Permission (ref. 20/01331/OUTMAJ) allowed at appeal (ref. 3272310) following non-determination. Several DOC applications approved.	66*
HS2.27	22/00941/FULMAJ - Erection of 55no. dwellings (including 35% affordable) with associated access, landscaping, parking, demolition and other works	Approved 13 August 2024. Appears no DOC applications have been submitted.	55
HS2.33	21/00847/OUTMAJ - Outline planning application for residential development specifying access from Blackburn Road (all other matters reserved)	Outline Planning Permission (ref. 21/00847/OUTMAJ) allowed at appeal (ref. 3312908) following non-determination.	40*

Allocation ref.	Planning History	Comments	Claimed Capacity
		No reserved matters of DOC applications submitted yet.	
HS2.35	23/00981/FULMAJ - Erection of 280no. dwellings with associated landscaping, drainage and other infrastructure.	Received a resolution to grant planning permission in October 2024 but awaiting Decision Notice. Updated Plans submitted February 2025.	289
Total			1,198

Source: Lichfields' Analysis

**Sites allowed at appeal.*

- 5.35 Of the 21 allocations set out in Policy HS2 that were assessed, 11 sites benefitted from an extant planning permission, or resolution to grant planning permission. This equates to 48% of the claimed 2,500 units supplied by these allocations, or 65% of supply after the six disputed sites have been removed. This is to say that almost 2/3 of supply that we consider to be developable over the plan period already benefits from planning permission. Several of the draft allocations are at advanced stages, with applications to discharge conditions approved and development having commenced on site in some circumstances. We would certainly expect units on some of these allocations to be delivered before the CLLP is adopted.
- 5.36 Of the 11 allocations which benefit from planning permission or a resolution to grant planning permission, six of the allocations were allowed at appeal (equating to a claimed capacity of 580 units, nearly a quarter of the claimed supply from the 21 allocated sites).
- 5.37 The inclusion of such a large proportion of sites which already benefit from planning permission (many of which allowed at appeal) clearly does not represent a plan which is ambitious or positively prepared. The CLLP has instead relied on existing permissions in formulating its supply. This is a reactive strategy, rather than a proactive strategy that seeks to meet Chorley's development needs over the CLLP period.

Windfall Sites

- 5.38 The CLLP is overly reliant on windfall development as a source of housing supply. For the reasons set out earlier in these representations, this is a fundamentally flawed approach that does not meet the tests of soundness and is likely to lead to under-delivery of housing across the plan period. No compelling evidence has been provided to demonstrate that the proposed windfall allowance will provide a reliable source of supply as required by NPPF paragraph 72.

Summary

- 5.39 In summary:
- The majority of delivery in the first five-years in Chorley is derived from existing permissions. Many of which were allowed at appeal having initially been deemed

inappropriate development by Chorley Council. This is not a positive, ambitious approach to allocating land;

- We have significant concerns over the developability of several allocations in Chorley, amounting to 668 units. The SHELAA anticipates the majority of allocations will deliver housing in years 5-10 of the plan period; and,
- Housing delivery is expected to drop dramatically in the final five-years of the plan period. This trend is exacerbated in Chorley, where the SHELAA expects just 118 units to be delivered across the five-year period.
- The CLLP is overly reliant on windfall development for housing delivery in Chorley and South Ribble and has not provided evidence to substantiate this approach. This will lead to the under-delivery of housing in these areas across the plan period

Tests of Soundness

5.40 Bloor considers that Policy HS2 is unsound and will not meet the tests of soundness for the following reasons:

- 1 **It is not positively prepared:** It fails to identify a sufficient quantum of developable land underpinned by sound evidence to meet objectively assessed needs. The CLLP, on the whole, does not proactively seek to identify land for housing. Instead, the CLLP is relying on sites which have been allowed at appeal in recent years to deliver housing in Chorley.

The distribution of housing across the plan period is concerning. The SHELAA anticipates that only 118 dwellings will be delivered in Chorley in the final five-years of the plan period.

- 2 **It is not justified:** Robust evidence to demonstrate the developability of allocations has not been provided for a significant proportion of the claimed housing supply in Chorley. It also fails to take account of more appropriate alternative sites to meet local housing needs.
- 3 **It is not effective:** At least six of the sites allocated for residential development by Policy HS2 are not developable and will undermine the delivery of housing in Chorley, and Central Lancashire more widely.
- 4 **It is not consistent with national policy:** It fails to identify a sufficient supply of developable sites to meet housing needs in Chorley, as required by paragraphs 11 and 69 of the NPPF. It is clear from some of the draft allocations that a sequential approach to allocating sites at lower risk of flooding had not been followed, as is required by NPPF paragraph 172.

Recommended Changes

5.41 We are of the opinion that significant changes are required to Policy HS2 for it to meet the test of soundness. Our analysis concludes that at least 668 dwellings in the claimed supply from Policy HS2 allocations is not developable and will not come forward within the plan period. The Council would need to identify a significant number of additional developable sites to address this shortfall. The CLLP should allocate additional sites, including sites

within the Green Belt, for residential development that are developable and will not undermine the delivery of housing in Chorley.

Land at Springfield Road, Coppull

Background

- 5.42 Bloor has interests in land off Springfield Road, Coppull, which can accommodate around 200 dwellings and account for a significant proportion of the units in Chorley that are not developable and should be deleted from the CLLP. The site extends to 15.5 hectares and is located to the south of Coppull. The identification of this site would also align with the settlement hierarchy of Chorley and ensure that Coppull's needs over the next plan period are met locally rather than in Preston or South Ribble.
- 5.43 Although this Plan is being examined in the context of the 2023 NPPF under the transitional arrangements, the most recent NPPF, updates to the PPG and Written Ministerial Statements are material considerations when examining this Plan. Regardless of the version of the NPPF being considered, significantly boosting the supply of housing is a key Government objective and the presence of Green Belt is now no longer a reason to not seek to meet an authority's housing requirement. As such, this Plan should seek to identify suitable and sustainable grey belt sites in Chorley to meet the full standard method requirement.
- 5.44 A Delivery Statement for the site was shared with the Council in February 2023 to demonstrate that the site is deliverable and there are no constraints that would preclude it coming forward for a residential development. A Vision Document for the proposed residential-led use of the site is provided alongside these representations.
- 5.45 The site forms a logical and well-contained extension to Coppull and is situated adjacent to the settlement's existing residential community. Inspired by the principles of a 20-minute neighbourhood, the site is located within walking distance of Coppull's amenities, services, and facilities. Its development provides opportunities to improve and enhance well-used pedestrian routes and Public Rights of Way.
- 5.46 As well as providing around 200 high-quality new homes, the site will incorporate provision for a variety of green open spaces with a landscape-led masterplan. The site also offers a suite of unique benefits. Its position adjacent to Coppull United Football Club provides a distinct opportunity to deliver a Club Improvement Zone for the benefit of the club and wider community.
- 5.47 The masterplan has followed a landscape led approach to ensure that deemed constraints have been integrated positively into the development. Key features such as woodland, the existing watercourse and PRoWs have been retained to provide ample green space and an area of ecological enhancement.
- 5.48 Coppull is a highly constrained settlement with few suitable sites for residential development. Land off Springfield Road is suitably located adjacent to existing residential development. The site is considered suitable for residential development and is the most logical extension to the existing urban area in Coppull.

5.49 The site is in single ownership, wholly controlled by Bloor, and can be brought forward at the earliest opportunity. Land off Springfield Road is in a suitable location for residential development, and is available, suitable and achievable, meeting the definition of developable as set out in the NPPF and PPG.

Grey Belt Assessment

5.50 Grey belt is defined by the latest NPPF 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.”

5.51 The PPG⁵ sets out how the contribution land makes to the relevant Green Belt purposes should be assessed when considering grey belt land. The PPG clarifies that Purposes A, B and D do not relate to villages. Coppull is a village, and not a town or large built-up area. Land at Springfield Road therefore makes **no contribution** to all three purposes.

5.52 The site is not subject to any designations set out in footnote 7 of the NPPF which would provide a strong reason for refusing or restricting development.

5.53 The 2024 NPPF states that the development of homes in the Green Belt should not be regarded as inappropriate where all of the exception criteria set out in paragraph 155 apply. The appropriateness criteria include where development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across an area of the plan. The PPG states that in reaching this judgement, authorities should consider whether, or the extent to which, the development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way. Given the relative scale of land at Springfield Road, we do not consider that its development would fundamentally undermine the purposes of the remaining Green Belt across the area of the plan.

5.54 The appropriateness criteria set out in paragraph 155 of the 2024 NPPF also requires land to be in a sustainable location. Land at Springfield Road is sustainably located on the edge of the existing settlement area. The site benefits from a range of local services, including food stores, schools, a Post Office, public houses and sports club facilities, within a 10-minute walking radius. The site therefore meets this criterion.

5.55 Land at Springfield Road is considered to meet the definition of grey belt, as set out in the 2024 NPPF and accompanying PPG. The proposed development of the site would accord with the appropriateness criteria described in paragraph 155 of the 2024 NPPF. The site therefore represents a logical allocation for residential development.

⁵ ID Reference: 64-005-20250225

6.0 Policy HS6 (Housing Mix and Density)

Introduction

6.1 Policy HS6 (Housing Mix and Density) states that all housing developments of 10 or more dwellings across Central Lancashire must:

a) Provide a mix of dwelling types and sizes to address the needs for that location as identified in the Housing Need and Demand Assessments; and

b) Build all dwellings to M4(2) accessible and adaptable standard; and

c) Build at least 4% of affordable dwellings on sites in Preston and Chorley, and at least 5% of affordable dwellings on sites in South Ribble, to M4(3) wheelchair accessible standard.

6.2 Policy HS6 also provides minimum gross densities on all housing developments as follows:

Location	Minimum Gross Density (dwellings per hectare)
Preston City Centre	86
Town, District and Local Shopping Centres	40
Other locations within settlement boundaries	27
Outside settlement boundaries	21

Consideration of Policy

Housing Density

6.3 Policy HS6 sets the minimum gross density (dwellings per hectare [dph]) for different locations across Central Lancashire. Due to a series of legal and national policy changes, gross to net developable area ratios have been reduced. These changes include a statutory requirement to provide a 10% in biodiversity net gain, introduced by the Environment Act (2021) and the requirement to provide public open space under the ‘Golden Rules’ set out in paragraph 156 of the 2024 NPPF.

6.4 As a result of these recent changes, there is now typically more uncertainty on the net ratios that can be achieved on sites and particular characteristics of sites can also have a considerable bearing on the gross density achievable. In light of this, Bloor welcomes the inclusion of part 4 of Policy HS6, which permits lower densities where it can be demonstrated that there are specific constraints that reduce the developable area. It would however be much more appropriate to set minimum densities on net developable area to account for site constraints, and policy and legal requirements.

Accessibility

- 6.5 Bloor is committed to providing accessible and adaptable homes for future residents and support the inclusion of a policy requirement to do so. The Government launched a consultation in September 2020 on raising the accessibility standards for new homes. The consultation concluded that the most appropriate way forward is to mandate the current M4(2) requirements, with M4(1) requirements applying “*by exception only*”. Following this consultation, the updated Building Regulations 2010 Part M approved document has not yet been published.
- 6.6 Footnote 51 of the 2024 NPPF states that “*planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.*”
- 6.7 Policy HS6 states that all market and affordable housing developments of 10 or more dwellings, or on sites of 0.4 hectares or greater, across Central Lancashire **must** build all dwellings to M4(2) accessible and adaptable standards.
- 6.8 Whilst Bloor is committed to delivering homes to an accessible and adaptable standard, as recognise by the NPPF and recent consultation on Part M of the Building Regulations, this is not always possible. For example, on certain sites, it is prudent to deliver part of the affordable housing units in apartment blocks of 2-3 storeys particularly to accommodate smaller units. However, to meet accessibility standard for upper floors of apartment blocks would require lifts to be installed in all blocks. This is impracticable and unviable for 2-3 storey residential apartment blocks and a degree of flexibility in the policy is required. A deliverability appraisal should be undertaken to assess the implications of this policy requirement, including on viability.

Tests of Soundness

- 6.9 Bloor considers that Policy HS2 is unsound and will not meet the tests of soundness for the following reasons:
- 1 **It is not justified:** No justification has been provided for the requirement for all new dwellings to be built to M4(2) accessible and adaptable standard. It has not been robustly tested through the plan’s viability appraisal. No justification has been provided for basing minimum densities on gross developable area, rather than net.
 - 2 **It is not effective:** Basing minimum densities on gross developable area is not effective and will stall housing delivery over the plan period for the reasons set out above.

Recommended Changes

- 6.10 Policy HS6 should be amended to reference net developable areas when setting out minimum residential densities.

- 6.11 Based on outcome of the plan's viability appraisal with respect to the M4(2) requirement of Policy HS6, a caveat may need to be added to reduce the requirement for M4(2) compliance if it can be demonstrated that it is not viable.

7.0 **Policy HS7 (Affordable Housing)**

Introduction

- 7.1 Policy HS7 sets out how the affordable housing needs identified in the Councils' 2024 HDNAs will be met. It sets a requirement for the proportion of affordable housing that will be sought on market developments across different tiers of the settlement hierarchy, as well as the social rent/affordable rent/affordable home ownership split for each district.

Consideration of Policy

Affordable Housing Need Figures

- 7.2 Policy HS7 states that all residential developments of 10 or more dwellings or, on a site of 0.5 hectares or more in size, must deliver affordable housing as follows:
- a A minimum of 30% of the total number to be provided on sites in Tiers 1, 2 and 3 of the settlement hierarchy.
 - b A minimum of 35% of the total number to be provided on sites in all other locations.
- 7.3 It goes on to state that on mixed tenure sites, affordable housing should be split 71:29 for social and affordable rent: affordable home ownership (including First Homes) in Chorley; 76:24 in Preston and 77:23 in South Ribble. It also goes on to note that this tenure split must be provided unless it can be robustly demonstrated that an alternative split meets an independently assessed proven need, or it is demonstrated to the Council that the development would not otherwise be financially viable.
- 7.4 Bloor has concerns with the methodology and conclusions of the three 2024 HDNAs on affordable housing need.
- 7.5 In the first instance, there are clear inconsistencies with the approaches taken across the three Local Authority areas, which means that the three preferred scenarios taken forward in the CLLP are inconsistent.
- 7.6 In particular:
- Chorley's 162 dpa net affordable housing need is based on clearing the backlog over a 10-year period, and including no newbuilds in the affordable housing supply.
 - Preston's 130 dpa net affordable housing need is also based on clearing the backlog over a 10-year period, but includes 295 newbuilds in the affordable housing supply.
 - South Ribble's 146 dpa net affordable housing need is based on clearing the backlog over a 5-year period, and includes 84 newbuilds in the affordable housing supply.
- 7.7 As a worst-case scenario, with all three areas aiming to clear the backlog over a 5-year period, and including no newbuilds in the affordable housing supply, the overall need would increase from 438 dpa to as much as **1,618 dpa** (412 dpa in Chorley, 976 dpa in Preston and 230 dpa in South Ribble).

7.8 Alternatively as a best case scenario, with all three areas aiming to clear the backlog over an extended 10 year period, and including all newbuilds in the affordable housing supply, the overall need would decrease from 438 dpa to just **115 dpa** (53 dpa in Chorley, 130 dpa in Preston and -68 dpa in South Ribble), which does not appear credible – particularly given that it would result in a negative need in South Ribble.

Table 7.1 Comparison of annual affordable housing need approaches for the affordable housing need in the CCLP

	Chorley 162 dpa	Preston 130 dpa	South Ribble 146 dpa
A1 Current gross unmet need (before affordability test)	4,435	10,663	3,301
A2 Current gross unmet need (after affordability test)	2,500 (Homeless households and priority need from MHCLG live tables + 2021 Census data on overcrowded, concealed and existing/other tenants in need). Assumes 43.8% A3-A6 cannot afford to rent or buy.	5,504 (Homeless households and priority need from MHCLG live tables + 2021 Census data on overcrowded, concealed, plus Household survey data on existing tenants in need and other tenures in need). Assumes 47.1% A3-A6 cannot afford to rent or buy.)	2,146 (Homeless households and priority need from MHCLG live tables + 2021 Census data on overcrowded, concealed, plus Housing Register data on existing tenants in need and other tenures in need). Assumes 47.5% A3-A6 cannot afford to rent or buy.)
A3 Annualised need	250 (cleared over a 10 yr period)	550 (cleared over a 10 yr period)	429 (cleared over a 5 yr period)
B1 Newly-arising annual need	478 (Average gross household formation rate based on applying national rate to total households over the period 2022-2039 (blended rate of 2014/2018-based projections), of which 43.8% cannot afford market housing.	595 (Average gross household formation rate based on applying national rate to total households over the period 2022-2039 (blended rate of 2014/2018-based projections), of which 45.7% cannot afford market housing.	318 (Average gross household formation rate based on applying national rate to total households over the period 2022-2039 (blended rate of 2014/2018-based projections), of which 44.4% cannot afford market housing.
Total Gross Need (A3+B)	728	1,145	747
C Affordable annual housing supply	566 (551 lettings + 0 vacant + 0 newbuild (other scenarios include 109 newbuild) + 15 AHO resales – 0 units taken out of management = 566 each year)	1,015 (683 lettings + 0 vacant + 295 newbuild + 37 AHO resales – 0 units taken out of management = 1,015 each year)	601 (501 lettings + 0 vacant + 84 newbuild + 16 AHO resales – 0 units taken out of management = 601 each year)
Total annual net need (TGN-C)	162	130	146

Source: Arc4 (2024): Chorley Borough LHNA / Preston Borough LHNA 2024 / South Ribble Borough LHNA 2024 / Lichfields' analysis

7.9 The figures are highly susceptible to subtle changes in the approach, although the clearest issue relates to the decision as to whether to clear the backlog in full over 5 or 10 years.

7.10 Secondly, it is difficult to understand why the net affordable housing annual need figures have fallen so significantly for Central Lancashire when compared with the data contained

within the HDNAs just two years previously, which were undertaken by the same consultant (arc4) using broadly the same data sources.

Table 7.2 Comparison of annual affordable housing need resulting in the preferred scenario in the CCLP

	Chorley	Preston	South Ribble	TOTAL
2022 HDNA	113 (5 yrs backlog clearance including newbuild)	395 (10 yrs backlog clearance including newbuild)	323 (5 yrs backlog clearance including newbuild)	831
2024 HDNA – CCLP HS7 preferred scenario	162 (10 yrs backlog clearance excluding newbuild)	130 (10 yrs backlog clearance including newbuild)	146 (5 yrs backlog clearance including newbuild)	438
Difference	+49	-265	-177	-393

Source: Arc4 (2024): Chorley Borough LHNA / Preston Borough LHNA 2024 / South Ribble Borough LHNA 2024 2024 / Lichfields’ analysis

7.11

As can be seen Table 7.2, in the 2022 round of HDNAs, arc4 calculated that the overall Central Lancashire affordable housing net annual need was for 831 dpa, 393 dpa higher than the 2024 round. The 2022 HDNAs used a 5-year backlog clearance for two of the three authorities.

Table 7.3 Comparison of annual affordable housing need approaches for the affordable housing need in the CCLP

	Chorley		Preston		South Ribble	
	2022 HDNA	2024 HDNA	2022 HDNA	2024 HDNA	2022 HDNA	2024 HDNA
A1 Current gross unmet need (before affordability test)	5,511	4,435	11,477	10,663	1,937	3,301
A2 Current gross unmet need (after affordability test)	4,755	2,500	6,747	5,504	1,937	2,146
A3 Annualised need	951	250	675	550	387	429
B1 Newly-arising annual need	439	478	552	595	406	318
Total Gross Need (A3+B)	1,390	728	1,227	1,145	793	747
C Affordable annual housing supply	1,277	566	831	1,015	471	601
Total annual net need (TGN-C)	113	162	395	130	323	146

Source: Arc4 (2024): Chorley Borough LHNA / Preston Borough LHNA 2024 / South Ribble Borough LHNA 2024 2024 / Lichfields’ analysis

7.12

The key differences between the reports are as follows:

- **Chorley:** Of particular note is the use of a 5-year backlog clearance in the 2022 report vs. 10 years in the 2024 iteration. The 2022 analysis also considers 1,265 households on the Housing Register in addition to the needs evidenced in the household survey, whereas these households appear to have been excluded in the 2024 HDNA, hence the 2,255 difference in step A2. As for step C, the 2022 HDNA included a much higher level of lettings (1,155) based on what the report terms ‘local lettings data’ before reverting back to much lower (551) RP lettings data over most recent 4-year period.
- **Preston:** The annualised need is higher in the 2022 report due primarily to higher levels of homelessness and the number of households in priority needs. The affordable

annual housing supply is much higher in the 2024 HDNA due primarily to the inclusion of 295 newbuilds a year compared to 183 in the 2022 report.

- **South Ribble:** there is a substantial increase in current backlog need in the new 2024 HDNA due to an escalation of the number of households on the Housing Register, and also the number recorded as homeless in the MHCLG Live Tables. The number of affordable housing supply has also increased in the latest document, predominantly due to an annual average of 372 general needs affordable dwellings were let 2018/19 to 2021/22, compared to 501 annually between 2019/20 and 2022/23.

7.13 In particular, we are concerned that for its principal scenarios, arc4 appears to have mistakenly included the current committed supply of affordable housing units on an annual basis, whereas they should have been netted off the current backlog need or excluded entirely. This is the same error that arc4 made in its 2021 Strategic Housing Market Assessment Update 2021 for Wirral Borough Council, and which was criticised by the presiding Inspectors at the subsequent Local Plan Examination:

“In that context, the 2021 Strategic Housing Market Assessment identifies that ‘as at December 2020 there were 940 affordable dwellings either on site or in the pipeline for development...’. Those 940 dwellings appear not to have been known of at the time of the 2019 Draft Strategic Housing Market Assessment, and it would be legitimate to take account of them. The 2021 Strategic Housing Market Assessment further explains in relation to those dwellings that ‘modelling assumes that these will be built in the next three years with annual supply of 313’ [H8.1, table C.6].

*What appears to have occurred, however, is that **delivery of 313 affordable dwellings has been assumed to occur each year in perpetuity. That is incorrect as anything beyond 3 years’ worth of supply of 313 affordable dwellings, 940 in total, is not committed supply. Casting an affordable housing supply of 313dpa forward in perpetuity therefore conflates supply and needs. In other words, the annual figure of 374dpa as in the 2021 Strategic Housing Market Assessment is in actuality 687dpa, which is not materially different from 705dpa.**” [Inspectors’ Report on the Examination of the Wirral Local Plan (13th March 2025), paragraphs 101 and 102, Lichfields’ emphasis]*

7.14 So, for Preston, arc4 took the current pipeline of 1,473 affordable dwellings, assumed that it would all be built over 5 years, and came to a figure of 295. However, this 295 dpa figure was then used in the supply calculation as a “*proxy for committed supply*” in perpetuity, which, as the Wirral Inspectors note, conflates supply with need. Whilst arc4 also goes on to model two variants which exclude newbuild commitments (and which increase the affordable housing need to between 425 dpa and 976 dpa depending on whether a 5-year or 10-year backlog clearance is used), the CLLP prefers to use the Principal Scenario of 130 affordable dpa with newbuild commitments included (see paragraph 4.58).

7.15 The same error can be seen in the South Ribble HDNA, where “*an annual average of 84 affordable dwellings have been built in South Ribble 2021/22 to 2023/24*” [Table C6] is included in perpetuity in the supply. Again, variants are modelled by arc4 in the HDNA, with the comparable scenario excluding newbuild commitments increasing the overall affordable housing need from 146 dpa to 230 dpa. The CLLP has again chosen to go with the lower figure of 146 dpa (see paragraph 4.59).

7.16 Whilst an annual committed supply of 109 affordable dwellings was also erroneously included in the Chorley HDNA, this element was excluded in the ‘Variant 2’ scenario calculation, and in this case the CLLP prefers to use the Variant figure of 162 dpa rather than the Principal scenario in the CLLP.

7.17 No explanation is given in the CLLP for this, which again demonstrates the inconsistent approach taken by the three Councils in picking and choosing different scenarios and components to generate affordable housing need in their areas.

7.18 **Being consistent across all three districts and excluding newbuild commitments (as in the case of Chorley) would increase Central Lancashire’s affordable housing need in the CLLP from 438 dpa to 817 dpa – some 62% of the total 1,314 dpa LHN.**

Tests of Soundness

7.19 The Consortium considers that Policy H7 fails to meet the tests of soundness for the following reasons:

- 1 **It is not positively prepared:** The 2024 HDNAs upon which the Councils’ affordable housing targets are based are flawed and significantly under-estimate the true level of affordable housing need across Central Lancashire. The fact that the need has apparently almost halved in just two years between the production of the 2022 and 2024 HDNAs, despite using very similar data inputs and at a time of national housing crisis, suggests that the true level of need has been severely under-estimated;
- 2 **It is not justified:** Despite having the option of choosing a number of variants that would exclude newbuild commitments, in Preston and South Ribble the respective Councils have chosen a lower level of need using an approach found to be flawed at a recent Local Plan Examination. The CLLP Policy is therefore not an appropriate strategy to deliver the identified affordable housing need.
- 3 **It is not effective:** Based on the three Councils’ residential supply, it will fail to meet Central Lancashire’s objectively assessed affordable housing needs. As such, it is not consistent with achieving sustainable development.
- 4 **It is not consistent with national policy:** The Policy does not reflect the need for affordable homes identified in the Council’s evidence (the three 2024 HDNAs), as required by the 2023 NPPF [§63].

Recommended Changes

7.20 The Councils must undertake a robust re-assessment of its affordable housing need and refer to scenarios that are robust (but which may ultimately lead to a higher affordable housing need target).

7.21 Based on the requirements of Policy H7, the supply of sites identified in the CLLP will not address the identified affordable housing needs for Central Lancashire.

8.0 **Policy ID2 (Developer Contributions and Planning Obligations)**

Introduction

- 8.1 Policy ID2 (Developer Contributions and Planning Obligations) states that new development will be expected to mitigate its impact on infrastructure services and the environment, and to contribute to the requirements of the community. This may be secured via planning condition, or by a planning obligation where development would otherwise be unacceptable, and/or through the Community Infrastructure Levy (CIL) to enable the cumulative impacts of developments to be managed.

Consideration of Policy

- 8.2 Paragraph 57 of the NPPF states that planning obligations must only be sought where they meet all of the following tests:

- a *necessary to make the development acceptable in planning terms;*
- b *directly related to the development; and,*
- c *fairly and reasonably related in scale and kind to the development.*

- 8.3 Any infrastructure requirements sought from Policy ID2 should meet the three tests set out in paragraph 57 of the NPPF. Bloor considers that the policy should be updated to refer to the above tests. This will ensure developer contributions are considered in the context of the NPPF.

- 8.4 Policy ID2 states that contributions may be secured via planning condition, or by a planning obligation where development would otherwise be unacceptable, and/or through CIL. The use of CIL must not result in developments being subject to double charging.

- 8.5 Policy ID2 (Part 5) states that the Council will charge a monitoring fee to cover the cost of monitoring and delivery of a s.106 obligation. Paragraph 36 of the NPPF and the PPG⁶ are clear that in all cases, monitoring fees must be proportionate and reasonable and reflect the actual cost of monitoring.

Recommended Changes

- 8.6 Bloor recommends that the three tests in relation to planning obligations, as set out in paragraph 57 of the NPPF, are referenced in the wording of Policy ID2. This will ensure that developer contributions meet the tests set out in the NPPF, and ensure that Policy ID2 is in accordance with national policy.
- 8.7 Bloor also recommends that greater clarity is provided on when planning obligations will be sought and when CIL will be charged. Greater clarity would help to avoid instances of developments being subject to double charging. This would ensure that obligations are only sought where they are necessary to make the development acceptable in planning terms (as required by paragraph 57 of the NPPF).

⁶ Reference ID: 23b-036-20190901

- 8.8 Bloor recommends that reference be provided in the wording of Policy ID2 to the requirement for monitoring fees to be proportionate and reasonable, and reflect the actual cost of monitoring as required by the NPPF and the PPG.

9.0 Conclusion

- 9.1 Bloor considers that CLLP Policies SS1 (Development Patterns), SS2 (Settlement Hierarchy), HS1 (Strategic Policy), HS2 (Housing Allocations – Chorley), HS6 (Housing Mix and Density), HS7 (Affordable Housing) and Policy ID2 (Developer Contributions and Planning Obligations) to be unsound, as currently drafted.
- 9.2 Through an assessment of these policies, these representations have reached the following conclusions regarding the CLLP:
- The CLLP does not allocate sufficient land for housing that meets the definition of developable and is overly reliant on development from windfall sites.
 - The CLLP does not provide a consistent approach to housing delivery across the plan area and is overly reliant on sites within and adjacent to Preston for housing delivery. The CLLP should provide sustainable patterns of development by distributing homes across the plan area.
 - The strategy used to meet Central Lancashire’s housing need does not meet the objectively assessed need for the three authorities and does not align with the Council’s employment land requirements. The strategy does not meet the needs of different groups of the community, redistributes housing away from the more desirable parts of the sub-region and features unsubstantiated modelling inputs that assume empty homes will reduce over time.
 - The CLLP relies on sites with planning permission for a large portion of housing delivery in Chorley, rather than proactively identifying sites for housing delivery. The housing trajectory set out in the SHELAA anticipates delivery to significantly reduce in years 10-15 of the plan, to concerningly low levels across Chorley.
 - The CLLP provides unrealistic and unjustified expectations with respect to housing mix and density.
 - The HDNAs upon which the Councils’ affordable housing targets are based are flawed and significantly under-estimate the true level of affordable housing need in the area. Based on the three Councils’ residential supply, the approach will fail to meet Central Lancashire’s objectively assessed affordable housing needs.
- 9.3 To address these conclusions and provide sufficient land for housing, the CLLP should reconsider the housing requirement to understand the scale of housing need to accommodate the additional labour force associated with 173 ha of employment land over the plan period. The Councils must also undertake a robust re-assessment of its affordable housing need to ensure that identified needs in Central Lancashire are met.
- 9.4 In light of a need to reconsider the proposed housing requirement, an over-reliance on windfall sites and concerns regarding the developability of allocations, the CLLP should review and amend Green Belt boundaries to meet development needs, specifically in Chorley.
- 9.5 Bloor has interest in land at Springfield Road, Coppull. It represents a unique opportunity to deliver around 200 of the dwellings, including affordable homes. The site is controlled by Bloor, available, and suitable for residential development. It will be brought forward for

development at the earliest opportunity if allocated through the emerging CLLP. A Vision Document for this site is provided alongside these representations.

the 1990s, the number of people in the world who are illiterate has increased from 400 million to 600 million.

There are many reasons for this. One is that the population of the world is growing so fast that the number of people who are illiterate is increasing. Another reason is that the quality of education is so poor that many people who are literate are unable to read and write. A third reason is that many people who are literate are unable to use their skills in a way that is useful to them.

There are many ways to improve the quality of education. One way is to invest more money in education. Another way is to improve the quality of the teachers. A third way is to make sure that the curriculum is relevant to the needs of the students.

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