

EiP Hearing Statement

Central Lancashire Local Plan

Bloor Homes

Representor ID A65

Our ref 64774/03/BOC/HR
Date 6 November 2025
To Central Lancashire Local Plan Examining Inspectors
From Bloor Homes Limited [ID: A65]

Subject Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

1.0 Introduction

- 1.1 Lichfields is instructed by Bloor Homes ('Bloor') to make representations on its behalf to the Central Lancashire Local Plan ('CLLP').
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 2 Examination in Public ('EiP') hearing sessions.
- 1.3 Separate representations have been submitted in respect of the following matters:
- Matter 1b – Overarching Matters
 - Matter 3 – The Housing Requirement
 - Matter 5 – Housing Allocations
 - Matter 6 – Housing Land Supply
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the CLLP (Representor ID A65) as well as those made on other Matters listed above. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework ('NPPF') (December 2023) and the National Planning Practice Guidance ('PPG').

2.0 Questions

Q2.1: Is the proposed spatial strategy and the distribution of development (as set out in policies SS1 and SS2 supported by robust and up to date evidence and otherwise soundly based? In particular:

a) Does it reflect the vision and objectives of the Plan?

- 2.1 It does not insofar as it relates to Chorley. The Vision of the Plan aims to deliver “a wide range of high-quality sustainable new housing and supporting infrastructure (to) meet the needs of our diverse communities”. Strategic Objective 3 (Sustainable Communities) also seeks to create a diverse range of housing to meet future needs.
- 2.2 Policy SS1 seeks to retain the existing Green Belt in Central Lancashire, directing development in Central Lancashire to within settlement boundaries, through the development of windfall sites, and on allocated sites. Policy SS1 uses existing Green Belt boundaries to drive its spatial strategy, rather than considering the most appropriate strategy to meet the needs of the plan area. Bloor considers that the land allocated for development by the plan, and land within the existing settlement boundaries are insufficient to meet the objectively assessed housing need and must be supplemented by other allocations.
- 2.3 Bloor recognises the importance of developing sites within existing settlement boundaries and regenerating brownfield land. However, this alone will not meet the overall requirement for the districts (see Bloor’s Matter 5 Paper). Furthermore, there can also be significant viability constraints associated with brownfield development, which can impact the delivery of homes, and in particular prevent policy compliant levels of affordable housing from coming forward.
- 2.4 To accord with the CLLP’s Vision of delivering a wider range of housing to meet the needs of diverse communities, additional land within and adjoining sustainable settlements across the districts should be allocated for residential development. This will create a sustainable pattern of development and offer residents genuine choice across the plan area as well as delivering affordable housing for local communities. This approach will also ensure that adequate levels of affordable housing are delivered over the plan period, particularly where the golden rules uplift is applied to sites released from the Green Belt.
- 2.5 The wording of Policy SS1 should be amended to recognise the importance of sustainably located sites within the Green Belt, which make a poor contribution to the purposes of including land in the Green Belt, in meeting market and affordable housing need.

b) To what degree is the distribution of development set out in Policy SS2 based on the settlement hierarchy in Table 1?

- 2.6 The Central Lancashire Authorities Response Document sets out that the settlement hierarchy stems back from the work which underpinned the extant Central Lancashire Core Strategy. The response explains that the settlement hierarchy reflects the range of services, level of employment opportunities and how accessible places are. Table 1 of the response

document sets out the proposed housing development by Settlement Tier. This is repeated below for reference.

Table 1 Proposed Housing Development by Settlement Tier - 1st April 2025 – 31st March 2041

Settlement Tier	Chorley	Preston	South Ribble	Total	% of total
Tier 1 – Preston Urban Area	N/A	9,501	N/A	9,501	44.54
Tier 2 – Key Service Centres	1,657	0	5,393	7,050	33.05
Tier 3 – Urban Local Service Centres	1,941	294	308	2,543	11.92
Tier 4 – Rural Local Service Centres	107	209 ¹	147	463	2.17
Tier 5 – Smaller Rural Villages and Hamlets	339	942 ²	286	1,567	7.35
Green Belt	37	0	168	205	0.96
TOTAL	4,081	10,946	6,302	21,329	100

¹ Includes Keyfold Farm In Broughton permitted on Appeal

² Includes 2 sites - Homes England development of Brownfield land at Whittingham Hospital allocated through the extant Core Strategy and Land at Cardwell Park which was granted planning permission on appeal. No new allocations identified in the CLLP.

Source: Central Lancashire Authorities Response Document

- 2.7 Bloor considers that Urban Local Service Centres, in particular Coppull, benefit from a range of services, employment opportunities and are of sufficient accessibility to be considered as appropriate locations for amendments to Green Belt boundaries. The wording of Policy SS2 should be amended to recognise that land sustainably located on the edge of Urban Local Service Centres and Key Service centres could be appropriate for residential development and would provide a reliable source of housing land.

c) Is the focus on the larger urban settlements justified and soundly based?

- 2.8 In principle, directing growth to higher order sustainable settlements is a logical approach, but it does not fully take into account the nuances of a specific authority (ies) area particularly where growth in the past has been constrained by Green Belt boundaries. Policy SS1 is a restrictive policy, continuing the approach taken previously, solely focusing growth based on not amending Green Belt boundaries, rather than allocating sufficient and suitably located sites to form a sustainable pattern of development and meet local needs. The policy and approach is overly reliant on allocations, and windfall sites, in larger urban settlements to deliver housing. In order to meet its housing requirement, the CLLP should review Green Belt boundaries, particularly in the authority area of Chorley, and allocate suitably located Green Belt and grey belt sites adjacent to Key Service Centres and Urban Local Centres, which make a poor contribution to the purposes of including land in the Green Belt.
- 2.9 The Green Belt Planning Practice Guidance [PPG] (updated February 2025) is clear that the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process.¹ Paragraph 145 of the 2023 NPPF states that Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified. Meeting development needs can represent an instance where the alteration of Green Belt boundaries is both necessary and an exceptional circumstance.
- 2.10 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 allowance in Preston. The NPPF states that where an allowance is to be made for windfall sites as part of

¹ Reference ID: 64-001-20250225

an anticipated supply, there should be “*compelling evidence that they will provide a reliable source of supply*” [§72], and that any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

- 2.11 As set out in greater detail in Bloor’s Regulation 19 soundness representations and the Central Lancashire SHELAA, 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 (2023). This point is discussed in greater detail in Bloor’s Matter 5 and 6 Papers.
- 2.12 The SHELAA anticipates that opportunities for brownfield development for both small and large sites will continue to arise as sites become redundant and available for redevelopment over the plan period. In reality, 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. The Council is also reliant on change of use applications and conversions, which increased as a result of permitted development rights expanding in recent years. However, the most appropriate sites are likely to have already come forward for development, and it is expected that the number of change of use applications and conversions will fall. The CLLP includes small windfall allowances from year 2 of the plan period. However, windfall sites are not planned for and do not already have planning permission. Due to the lead in times, it is widely accepted that windfall allowances should not be included until year 3 of the plan period after adoption (i.e., 2028/2029).
- 2.13 The spatial strategy is overly reliant on windfall sites within larger urban settlements. This approach is not positively prepared, justified, effective or consistent with national policy. It will lead to insufficient housing delivery across the plan period and will do nothing to address the housing need in sustainable settlements particularly those in Tier 3 and Tier 4 settlements which are tightly defined by Green Belt boundaries. The spatial strategy should be reconsidered, with additional land allocated for residential development in sustainable locations adjoining Key Service Centres and Urban Local Service Centres. This will ensure that the approach is sound, and housing need is met over the plan period, in particular in the early stages of the plan period.

d) How were the proportions of development proposed for each settlement arrived at?

- 2.14 It is not clear and has not been set out in the published evidence base. The Central Lancashire Authorities Response Document sets out the proposed housing development by settlement tier over the plan period, noting that 4,081 units are to be delivered in Chorley, 10,946 units are to be delivered in Preston, and 6,302 units are to be delivered in South Ribble. The response states that for Chorley this does not include a windfall allowance. However, as demonstrated by the historic delivery rates set out in the Central Lancashire SHELAA, and explained in greater detail in Bloor’s Regulation 19 representations, windfall sites have not provided a consistent level of housing completions historically in Chorley and the evidence base fails to demonstrate that windfall sites represent a reliable source of supply as required by paragraph 72 of the NPPF (2023).

- 2.15 The Standard Method 3 [SM3] for calculating housing need figures is 557 dpa for Chorley, 632 dpa for Preston and 498 dpa for South Ribble. It is unclear why the CLLP is seeking to deliver a disproportionate number of the required dwellings in Preston and South Ribble, and significantly less dwellings in Chorley. The Integrated Assessment of the CLLP does not appear to adequately consider the implications of this approach on Chorley in terms of the consequences for not meeting its full local housing need figure.
- 2.16 Furthermore, Bloor has concerns about the deliverability of the land that is allocated for residential development in Chorley. The plan should review Green Belt boundaries in Chorley, and additional land should be allocated for residential development in sustainable locations surrounding Key Service Centres and Urban Local Centres. This will ensure that sufficient developable land is allocated to meet housing needs, development is sustainably distributed across the plan area, and the approach is sound.
- e) Would it provide sufficient development within rural areas and other settlements?*
- 2.17 No. Policy SS1 directs development in Central Lancashire to within settlement boundaries, through the development of windfall sites, and on allocated sites. Policy SS2 directs development towards the Preston Urban Area, through a combination of major new development to meet strategic needs, redevelopment and regeneration activity.
- 2.18 The Settlement Hierarchy directs the vast majority of development towards Tier 1 and Tier 2 settlements but there are many other sustainable settlements which have not been positively catered for, and their needs are being ignored. Policy SS2 fails to identify sufficiently diverse sources of land for housing, which is available and capable of delivering housing in the short to medium term. It would be more effective to distribute development across the plan area by amending Green Belt boundaries to allocate land for residential development in sustainable locations, thus allowing suitable sites to come forward in the short term to meet housing need. Amending Green Belt boundaries would also create a more diverse typology of sites, which can deliver units in the short term whilst larger strategic sites, which typically have longer lead-in times, progress.
- 2.19 Bloor recognises the importance of brownfield development and regeneration of land within the urban area. There are however significant viability constraints associated with some brownfield development, meaning that grant funding is likely required to bring sites forward. As a result of viability pressures, regeneration schemes are often not able to deliver policy compliant levels of affordable housing.
- 2.20 To ensure that a sufficient number of homes is delivered across the plan period, and sufficient affordable housing is provided, 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, ensuring that sufficient land is allocated to meet housing needs, and that future housing provision is varied, to meet the needs of people across Central Lancashire.

Q2.2: What is the evidential basis for the settlement hierarchy in policy SS2? Is this consistent across all 3 authorities? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

- 2.21 The distribution of sites does not reflect the settlement hierarchy and is reactive to where sites which benefit from planning permission or live applications are located, rather than being positively prepared and allocating land adjacent to settlements, which would create a sustainable spatial distribution of sites across all three authorities. Bloor has considerable concerns that this will not deliver a sufficient number of homes across the plan period.
- 2.22 The CLLP does not provide sufficient evidence that the settlement hierarchy in Policy SS2 is appropriate. The approach to identifying allocations and the distribution of development is derived from retaining Green Belt Boundaries, rather than considering appropriate sustainably located sites. The approach needs to be underpinned by a robust evidence base, to ensure that it is justified and effective.

Q2.3: What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Integrated Assessment work?

- 2.23 The CLLP uses existing Green Belt boundaries to drive its spatial strategy, rather than considering the most appropriate strategy to meet Central Lancashire's needs. Green Belt sites within sustainable locations should have been considered as an alternative strategy for housing delivery. The Councils need to provide robust evidence and explain what spatial strategies were considered and a reasoned response as to why they were discounted.

Q2.4 Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

a) Is the site selection process transparent? How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?

- 2.24 Different development constraints have not been taken into account in an appropriate way and the Council has decided to retain Green Belt as a starting point for selecting allocations, rather than considering sites on merit. Policy SS1 uses existing Green Belt boundaries to drive its spatial strategy. The Central Lancashire Authorities Response Document states that it has been evidenced that housing and employment needs can be met without the need to release Green Belt. We do not agree with this assertion and are of the opinion that the housing need can only be met if the existing allocations are supplemented by sustainable Green Belt releases. No changes have been made to settlement boundaries within Chorley and South Ribble (with the exception of Chorley Town).
- 2.25 The CLLP has failed to appropriately consider Green Belt sites in sustainable locations as an alternative strategy. The PPG is clear that the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process.

Paragraph 145 of the 2023 NPPF confirms that Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified. The failure to consider Green Belt sites as part of the site selection process contradicts guidance and will result in insufficient land being allocated to meet housing needs as required by paragraph 11 of the NPPF. Meeting development needs represents an instance where the alteration of Green Belt boundaries is both necessary and an exceptional circumstance.

b) Were constraints given relative weight in the site selection process? If so, how was this determined?

- 2.26 No. Existing Green Belt sites were not appropriately considered as part of the site selection process. Other sites in Chorley that Bloor do not consider to be developable, have however been allocated for residential development. The site selection process should have considered Green Belt sites in sustainable locations as an alternative strategy, and the merits of these sites should have been weighed against sites not in the Green Belt, rather than being dismissed.
- 2.27 Bloor has considerable concern over the developability of several of the sites allocated for residential development in Chorley, as set out in greater detail in the Regulation 19 representations and Matter 5 Paper.

Q2.7: Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?

- 2.28 Policies SS1 and SS2 are not sufficiently flexible. They are restrictive policies which directed development to land within settlement boundaries (through the development of windfall sites) and on allocated sites. Policy SS1 states that the Green Belt will continue to prevent urban sprawl by keeping land permanently open. Development in the open countryside is restricted to enabling limited rural housing, supporting agricultural, the local rural economy and recreation where it is appropriate to a rural area.
- 2.29 Flexibility should be added to the wording of Policies SS1 and SS2 to enable suitably located Green Belt and grey belt sites adjacent to existing Key Service Centres and Urban Local Centres, which make a poor contribution to the purpose of including land in the Green Belt (as set out in paragraph 143 of the 2023 NPPF), to be developed to help meet housing needs.
- 2.30 The allocation of Green Belt land is necessary to ensure that Policies SS1 and SS2 meet the tests of soundness. At present, the policies are not positively prepared, justified, effective or consistent with national policy.