

Central Lancashire Local Plan 2023-2041

Response to Inspector's Matters, Issues and Questions On behalf of Northern Trust Land Ltd

Matter 2 'Spatial Strategy'

1. De Pol Associates is instructed by Northern Trust Land Ltd to submit a hearing statement in response to Matter 2 of the Inspector's Matters, Issues and Questions (ID03) and in particular questions 2.1, 2.2, 2.5 and 2.7.

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. No. Local Plan Strategic Objective 2 'Sustainable Patterns of Development' is to focus development at sustainable locations accessible by active modes of travel. Making the best use of existing land, infrastructure, facilities, and services wherever possible, and ensuring that any necessary mitigation or improvements to meet future needs are identified, appropriately funded, and brought forward in a coordinated and timely manner. Objective 3 'Sustainable Communities' is to create healthy, vibrant, safe, and sustainable communities with a diverse range of housing to meet future needs. Providing a scale and mix of housing types and sizes and a variety of tenures in a range of locations to meet economic aspirations and local housing needs.
3. The explanatory text to Policy SS2 states at paragraph 3.14 that the use of a Settlement Hierarchy in the Local Plan ensures that development is distributed to and takes place in the most sustainable and appropriate places through a plan led approach. The hierarchy reflects the role and function of places, the level and range of services and facilities, the extent of employment opportunities and how accessible places are. It states that as a general principle, settlements higher up the tiers in the hierarchy will be the focus for more growth than those lower down, reflecting the range of services and facilities, levels of accessibility, employment opportunities and transport connections.



4. As expanded upon in responses to other Matter 2 questions below, and notwithstanding other representations relating to the distribution of housing need away from Chorley to Preston and South Ribble, it is considered that the distribution of housing within Chorley Borough is primarily based on the Council's desire to avoid a review of restrictive Green Belt boundaries as opposed to distributing development in the most sustainable and appropriate places to meet strategic objectives 2 and 3.

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

5. In CLA03 the Council's response to ID01 Inspector's Initial Questions includes Table 1 which confirms that there are over three times as many homes being directed to Tier 5 smaller rural villages and hamlets compared to Tier 4 rural local service centres, not only in Central Lancashire as a whole but in each individual authority. This Hearing Statement focuses on Chorley, where based on Table 1 most development is being directed to Tier 3 Urban Local Services Centres (48%) as opposed to the Tier 2 Key Service Centre of Chorley (41%) and the Tier 5 Smaller Rural Villages and Hamlets are accommodating more growth (8%) than Tier 4 Rural Local Service Centres (2.6%). This does not reflect the settlement hierarchy of Policy SS2 and Table 1.
6. In CLA03 the Council response to Q2b) is that this distribution is reflective of the availability of land in those areas and a greater number of settlements in Tier 5 than Tier 4. In Chorley Borough the Tier 5 allocations are focused across just five villages, with individual villages such as Mawdesley village having allocations totalling 122 dwellings compared to just 2 dwellings at the Tier 4 Rural Centre of Croston. As to the statement that the distribution of housing reflects the availability of land this is only on the basis that the Council refuse to undertake a review of the Green Belt boundaries which significantly restricts development opportunities at sustainable Tier 4 settlements such as Croston and Eccleston.
7. It is considered that the distribution of housing, especially within Chorley Borough, is based more on the availability of land outside the Green Belt as opposed to the settlement hierarchy.

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

8. This Hearing statement relates primarily to Chorley Borough where the proportions of development proposed for each settlement appear to be dictated by the availability of land



outside the Green Belt due to the Council's clearly stated desire to avoid a review of the Green Belt boundaries.

e) Would it provide sufficient development within rural areas and other settlements?

9. No, especially with regards to Chorley. This is due to both the redistribution of housing away from Chorley to Preston and South Ribble, which is considered in Hearing Matter 3, but also due to development in Chorley Borough being directed in a manner to avoid a Green Belt review as opposed to directing development to settlements based on their facilities, services and suitability for growth. This is expanded upon below under other questions, although the Council's approach of prioritising housing in a manner which avoids Green Belt release equates to the Plan directing just 483 dwellings over the 16 year plan period across the whole rural area of Chorley, which include Tier 4 Rural Centres, Tier 5 Smaller Rural Villages and Hamlets and Green Belt¹.

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?

10. In CLA03, the Council's response to ID01 Inspector's Initial Questions states that the settlement hierarchy stems back from work which underpinned the current adopted Central Lancashire Core Strategy (CS). That the overall strategy was developed to direct new growth and investment to the most sustainable locations within Central Lancashire and that this approach remains relevant in the emerging CLLP.
11. The CS publication version was submitted for examination on 31 March 2011, meaning the evidence base informing this plan is over 15 years old and pre-dated the NPPF and national policy objectives such as NPPF paragraph 83. Furthermore, the thrust of CS Policy 1 was to concentrate growth and investment on well located previously-developed land in the Preston/South Ribble Urban Area, focussing on regeneration opportunities in the Central Preston Strategic Location and the new Central Business District (CBD), with a target of 70% of residential development on previously-developed land². This clearly influenced the settlement hierarchy in policy 1.

¹ Table 1 in CLA03 the Council's response to ID01 Inspector's Initial Questions

² CS Policy 1 and explanatory text, together with Policy 4 and paragraph 8.15 re 70% brownfield target



12. Circumstances have changed and the Council's response to the Inspector's Questions acknowledges that there are clear examples of where the CS Policy 1 hierarchy does not properly reflect the current sustainability and suitability of individual settlements to accommodate growth. Croston in Chorley Borough is specifically referred to by the Councils as a settlement which is wrongly included in the lowest tier in CS Policy 1 and is proposed to be relocated to Tier 4. As highlighted later in response to Q2.5 below, Croston is a clear example of a settlement where some growth should be directed under the terms of policy SS1 and SS2 and NPPF paragraph 83. Indeed, it is considered that Croston and other tier 4 rural centre Eccleston are more sustainable for accommodating growth in terms of facilities and services than some the urban centres in Tier 3. The Council's response includes other examples where settlements across Central Lancashire have been moved between tiers compared to CS Policy 1.
13. However, there is no up-to-date settlement assessment which has informed the settlement hierarchy in Policy SS2 and Table 1, nor any robust justification as to why Tier 4 settlements such as Croston and Eccleston should be permitted only limited growth despite them having a wide range of facilities and services and the Regulation 18 Plan not differentiating between Tier 4 rural centres and Tier 3 urban centres in terms of both being deemed suitable for *"moderate growth and investment"*.
14. Ultimately the CLA have not provided an up to date evidential assessment to properly inform the settlement hierarchy.

Q2.5 Does the Plan allow sufficient development in rural local centres, smaller villages and hamlets, rural areas and settlements to comply with paragraph 83 of the Framework? Are the proposed settlement development boundaries up to date and are these appropriately drawn? What factors were taken into account in designating these?

15. The Green Belt in Chorley was established over 40 years ago and is significantly curtailing the ability of sustainable settlements to grow contrary to NPPF23 paragraph 83, especially given the repeated refusal of the Council to review these Green Belt boundaries. Northern Trust Land have submitted representations highlighting how there is land on the edge of sustainable Rural and Urban Service Centres which have little contribution to the Green Belt purposes other than assisting in safeguarding countryside from encroachment. It is considered that a refusal to review Green Belt boundaries around such settlements fails to allow for sustainable



growth and the identification of opportunities for villages to grow and thrive, especially where this will support local services as required by Framework paragraph 83.

16. A clear example of this is Croston in Chorley, which is identified a Tier 4 Rural Centre containing a designated Local Centre. It is a village with a variety of food and non-food retail shops including Morrisons and Londis supermarkets, chemists and a post office. It has two doctors surgeries and dentist, primary and secondary schools, churches, public houses, eating establishments, hot food takeaways, cafes and a community centre. There is a sports club with football, cricket, tennis and netball facilities as well as restaurant, sports bar and function room. There is also a village recreational ground and an industrial estate. It also has sustainable transport options including a railway station providing services to Preston and Ormskirk and a bus route through the village providing regular services to Chorley, Preston and Rufford. It is clearly an accessible settlement with a level and range of services and facilities which makes it suitable to accommodate growth in line with the sustainability objectives of the LP and NPPF. Indeed in the Regulation 18 Preferred Options Plan it was identified as a Tier 4 Local and Rural Centre where along with Tier 3 settlements “*moderate growth and investment will be directed*” and where a housing allocation of 186 dwellings was originally proposed (allocation CH/HS1.34).

17. However, allocation CH.HS1.34 has been removed in the Publication Plan due to access and flood risk constraints³ and as the Green Belt tightly constrains the settlement the only housing allocation now proposed is a small site within the settlement boundary for 2 dwellings (HS2.22). This is despite representations by Northern Trust Land highlighting alternative available, suitable and deliverable land on the edge of Croston which does not have such technical constraints and whilst being located within the Green Belt does not contribute towards the Green Belt purposes other than safeguarding countryside, the importance of which is somewhat curtailed given the significant countryside land being released elsewhere across Central Lancashire to meet the housing requirement. Furthermore, whilst the Regulation 18 Preferred Options Plan did not differentiate between Tier 4 rural centres and Tier 3 urban centres in terms of both being deemed suitable for “*moderate growth and investment*” the Regulation 19 Plan has downgraded the Tier 4 centres to “*limited new development*” without any justification.

³ SHELAA Appendix 5 - Site Profile 25 (pages 75 to 77)



18. The Council's refusal to consider a Green Belt review around rural centres such as Croston results in very limited growth potential at this sustainable village in favour of the allocation of 122 dwellings at the village of Mawdesley, despite this being a far less sustainable and smaller Tier 5 'smaller rural village and hamlet'. Croston is a clear example of a settlement where some growth should be directed under the terms of policy SS1 and SS2 and NPPF paragraph 83. Indeed the Council's approach of prioritising housing in a manner which avoids Green Belt release equates to the Plan directing just 483 dwellings over the 16 year plan period across the whole rural area of Chorley, which include Tier 4 Rural Centres, Tier 5 Smaller Rural Villages and Hamlets and Green Belt⁴.

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?

19. Irrespective of comments relating to where housing is actually being distributed, it is considered that policy SS2 should be amended to remove the reference to limited development in Tier 4 so that it reflects Tier 3 in terms of permitting development which is of a scale and type appropriate to the settlement size and character.

⁴ Table 1 in CLA03 the Council's response to ID01 Inspector's Initial Questions