

Hearing Statement

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

November 2025

Representor: The Cooper Family

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Site: Land at Toy Farm, Euxton

Contents

1.	Introduction	3
2.	Issue 2: Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?	4

1. Introduction

- 1.1 This Hearing Statement relates to Matter 2 and is submitted by The Cooper Family, who have submitted consultation responses at each consultation stage.
- 1.2 The Cooper Family are participating in the Examination process as they are promoting land at Toy Farm in Euxton. A Development Statement related to the merits of the site in the context of the need to identify additional housing sites in order to meet housing needs in full was provided at Appendix 1 to their Regulation 19 consultation response.
- 1.3 The development Statement confirms that the land at Toy Farm is deliverable and a sustainable location towards which new homes should be directed.
- 1.4 We trust that this Statement assists the Inspectors in respect of the Examination.

2. Issue 2: Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

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 While the Plan's Vision promotes economic growth and sustainability, the housing distribution fails to match the objective of meeting local housing needs. Specifically, Strategic Objective 3 aspires to provide a scale and mix of housing to meet needs, yet the Plan's chosen housing requirement for Chorley (only 334 dwellings per annum (dpa)) contradicts this objective. The shortfall between Chorley's need and its allocation means the strategy is not positively prepared in line with the Vision

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

2.2 The distribution nominally follows the settlement hierarchy (Table 1), focusing growth in higher-tier settlements, which is supported in principle. Euxton, for example, is identified as a Tier 3 Urban Local Service Centre where "moderate growth" is envisaged. However, because Euxton's expansion is constrained by Green Belt, the Plan allocates insufficient housing to Chorley's tier-1/2 urban areas and adjacent Tier-3 settlements. In practice, a disproportionate amount of development is steered to Preston (Tier 1) at the expense of Chorley's sustainable locations. This suggests the hierarchy was not applied consistently across the three authorities.

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

2.3 Concentrating development in larger urban settlements is justified by sustainability principles and existing infrastructure. The Cooper family supports focusing growth in Chorley town and its urban fringe as sustainable locations (e.g. the Euxton/Chorley corridor). However, the Plan's execution of this focus is unsound – Chorley is a main urban centre but is under-allocated housing due to Green Belt constraints, undermining the objective of urban focus. The strategy should have ensured that major urban areas in each district receive

Matter 2 Hearing Statement

The Cooper Family – Toy Farm, Euxton

appropriate growth. Instead, Chorley's urban area is constrained such that its housing need is expected to be met elsewhere (notably in Preston), which is not a truly spatially balanced urban focus.

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

- 2.4 The Plan does not transparently justify how the specific percentages of development per authority or settlement were determined. It appears the proportions were driven by the decision to cap Chorley's requirement at 334 dpa (to utilise the 80% transitional allowance – see Matter 3), rather than by evidence of capacity or need. Consequently, Chorley's share of the housing requirement (approx. 25% of the Central Lancs total) is far below its share of need. This approach reflects a desire to avoid Green Belt release in Chorley, rather than a sound evidence-based apportionment. In our view, more growth should have been allocated to Chorley Borough (including its sustainable edge-of-urban sites) to reflect its high housing need and economic potential, even if that requires land to be released from the Green Belt (exceptional circumstances can be justified by chronic undersupply).

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

- 2.5 The Cooper family has no specific comments to make in relation to the provision for rural areas. We note that the Plan directs only limited development to rural local centres, villages and hamlets in line with national policy, which is appropriate from a sustainability perspective. Our principal concern is with the under-allocation in Chorley's sustainable urban locations, rather than the level of rural development that is proposed.

f) Does the distribution of employment related development take appropriate account of national and regional programmes and strategies?

- 2.6 The Cooper family has no detailed comments on the spatial distribution of employment land. We do note, however, that a robust spatial strategy should take account of major regional initiatives like the Lancashire Enterprise Zones and the Central Lancashire City Deal. If significant employment growth is planned (the Plan allocates 173 ha of employment land, as per the evidence set out in BE Group's latest Employment Land Study update), housing distributions should align by providing new homes near those employment growth locations, in particular Chorley. The economic growth strategies for Lancashire call for ambitious housing growth across Central Lancs, however the spatial strategy as proposed does not fully respond to these aims.

Matter 2 Hearing Statement

The Cooper Family – Toy Farm, Euxton

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?

- 2.7 The Cooper family has no specific comments to make in relation to the evidential basis for the settlement hierarchy. We generally agree that the hierarchy (Policy SS2, Table 1) reflects the pattern of settlements and is broadly consistent across the three councils (with Preston and Chorley as primary urban centres, etc.). Our concern is less with the hierarchy itself and more with the use of that hierarchy to justify the uneven distribution of housing. (See our responses to Q2.1 and Q2.3.)

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?

- 2.8 The Plan's preparation does not appear to have fully tested reasonable alternative spatial strategies that might have met Central Lancashire's housing needs more effectively. In particular, an alternative involving higher housing provision in Chorley (including Green Belt release) was not fully considered.
- 2.9 The Sustainability Appraisal / Integrated Assessment (SA) should have evaluated a scenario closer to the standard method housing need (1,643 dpa) with a more proportionate distribution, but the submitted plan instead fixed on a lower "employment-led" scenario. The evidence base (e.g. the Housing Study updates and spatial option testing in the SA) seems to have omitted a true alternative of meeting 100% of Local Housing Need, perhaps assuming the transitional 80% approach was a given. This calls into question whether the the Plan's approach can be considered to be justified (NPPF, paragraph 35b) and in turn whether the Plan can be considered to be 'sound'
- 2.10 A less constrained alternative, i.e. allocating more land in Chorley (for example on modest Green Belt release sites like Toy Farm, Euxton) to meet that borough's needs could have reasonably been selected. There is no clear explanation in the SA or Topic Papers why such alternatives were set aside. Therefore, the spatial strategy may not be the most appropriate strategy when considered against reasonable alternatives, as required for soundness.

Matter 2 Hearing Statement

The Cooper Family – Toy Farm, Euxton

Notably, the Council's own supporting text acknowledges unmet need in Chorley but then discounts Green Belt sites rather than consider adjusting the strategy to meet housing needs in full.

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?

2.11 The Councils have published a Site Selection Methodology (Document HO15), but its application has resulted in some unclear outcomes. All promoted Green Belt sites in Chorley (including our client's land at Toy Farm, Euxton) were rejected early, seemingly because of Green Belt policy without a finer-grained review of their individual merits. Key constraints were identified, e.g. Toy Farm lies in the Euxton–Chorley strategic gap, but the process did not transparently balance this against the acute housing need shortfall and the consideration that exceptional circumstances could exist to justify Green belt release. There is little evidence that the Councils weighed the exceptional circumstance of meeting Chorley's need against Green Belt harm in any systematic way. Thus, while the inventory of sites was comprehensive, the reasons certain alternatives were dismissed are not fully clear or convincing.

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

2.12 It appears that certain constraints (especially Green Belt designations) were given absolute weight, effectively overriding other planning considerations. In Chorley, all Green Belt sites were excluded from being considered as allocations, despite some being sustainable and well-contained. Consideration of the Cooper family's site at Toy Farm, Euxton illustrates this concern. With reference to the LUC Green Belt Study, Toy Farm fell within two large parcels P21 / P22, which together covered the entire gap between Chorley and Euxton. Because those broader parcels scored highly for preventing merger, the site was not shortlisted. Had smaller "parcel areas" been assessed, parts of Toy Farm could score differently. We contend the process did not fairly consider whether a carefully masterplanned partial

Matter 2 Hearing Statement

The Cooper Family – Toy Farm, Euxton

development could maintain the overall separation and create a new defensible Green Belt boundary.

c) In relation to flood risk, were sites at low risk preferred over those at greater risk? How did the Strategic Flood Risk Assessment (SFRA) inform site selection? Does the SFRA2 reflect the most up to date flood-mapping? Where sites are proposed for development in areas of flood risk, does the Plan take a sound approach in how these matters will be addressed?

2.13 The Cooper family has no specific comments on the treatment of flood risk in site selection.

d) What account was taken of Best and Most Versatile Agricultural Land?

2.14 The Cooper family has no specific comments on how BMV land was accounted for. We note that much of Central Lancashire's undeveloped land (including parts of the promoted Toy Farm site) is Grade 3 agricultural quality. To meet housing needs, it may be unavoidable that some BMV land is lost, but we have not seen evidence that this was a decisive factor in site choices. The Plan should clarify if any allocations involve BMV land and demonstrate the requisite sequential considerations (per NPPF paragraph 172(b))

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?

2.15 The Cooper family does not have any specific comments to make in respect of this question.

Q2.6 What are the Plan's assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans?

2.16 The Cooper family does not have any specific comments to make in respect of this question.

Matter 2 Hearing Statement

The Cooper Family – Toy Farm, Euxton

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?

- 2.17 The Plan's spatial strategy policies could be more flexible and forward-looking. There are two primary concerns in this regard:
- 2.18 Our first concern is that no Safeguarded Land has been identified within the Plan. The Plan proposes to retain existing Green Belt boundaries entirely until 2041 (Policy SS1). If consideration is not given to the release of Green Belt now, either to identify new housing allocations or identify areas of safeguarded land, the Plan provides no flexibility should the identified sources of housing land supply fail to deliver the anticipated yield of housing.
- 2.19 The NPPF is clear that when Green Belt boundaries are set, councils should satisfy themselves that those boundaries will not need to be altered at the end of the plan period. Given Central Lancashire's growth pressures, it is likely that additional land will be needed beyond 2041. By not designating safeguarded land, the Plan is rendered inflexible and risks piecemeal Green Belt release by appeal. The Cooper family believes that safeguarded land should be identified in Chorley (such as Toy Farm, if not allocated for housing now) to ensure that the existing Green Belt is capable of enduring beyond this plan period.
- 2.20 Our second concern is the rigid distribution of housing that is proposed. The Plan contains no mechanism to adjust housing distribution if monitoring shows a shortfall in one borough. This inflexibility could undermine effectiveness. For instance, if Chorley's under-delivery continues (as recent trends suggest), there is no contingency to bring forward reserve sites. A sound plan would either include reserve housing allocations or a commitment to early review should delivery fall below a specified trigger. In the current Plan, the housing requirement is treated as a fixed ceiling rather than a minimum target to be exceeded if possible. In our view, treating the 1,314 dpa as a cap is contrary to the NPPF's aim to significantly boost housing supply. A more flexible, positively prepared approach would be to allow (and plan for) additional sustainable sites to come forward, especially if the economy grows faster or if certain large sites stall.