

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

Central Lancashire Local Plan Examination

On behalf of Castle Green Homes

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Document Management

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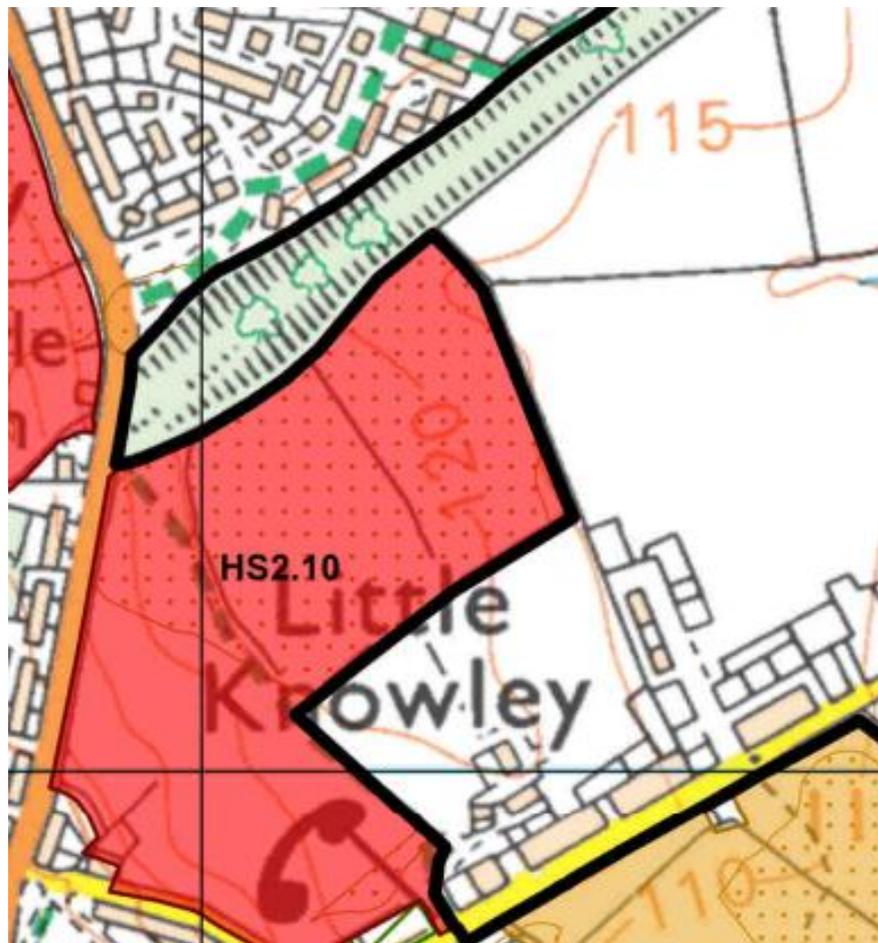
Contents

1. Introduction.....	1
2. Question 2.1.....	3
3. Question 2.5.....	6

1. Introduction

- 1.1. Pegasus Group has been instructed on behalf of their client, Castle Green Homes (hereon in “Castle Green”), to prepare Hearing Statements to the Central Lancashire Local Plan Examination (EIP) in support of their land interests in Chorley Borough. Namely, Castle Green has a development option on the land at Little Knowley Farm, Chorley.
- 1.2. This includes the draft Little Knowley Farm allocation (HS2.10 – see **Figure 1**), which is currently allocated for 150 no dwellings.

Figure 1: Little Knowley Farm Allocation (HS2.10)



- 1.3. A live planning application (25/00634/FULMAJ) is pending determination on site, for the erection of 146 no. dwellings.
- 1.4. Castle Green’s option on the wider Little Knowley Farm landholding includes further land to the east of the current draft allocation (see **Figure 2**). It is Castle Green’s position that the whole parcel (shown at **Figure 2**) should be allocated for residential development (under HS2.10) to ensure the development requirements and spatial strategy of the Local Plan are appropriately met.

Figure 2: Extent of land within Castle Green Homes' control



1.5. This Statement deals with Matter 2, which addresses the following issue:

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

2. Question 2.1

Policies SS1 & SS2

2.1: 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. The principles of Policy SS1 (Spatial Strategy) and Policy SS2 (Settlement Hierarchy) are broadly sound, however it is considered that insufficient development is directed to Chorley Town (a Key Service Centre/Tier 2) to achieve strategic objective 3 of the Plan:
- “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**”*
- 2.2. This needs to be considered alongside strategic objective 2 on the Plan to “focus development at sustainable locations accessible by active modes of travel”.
- 2.3. Further housing is required (and indeed justified) in Chorley as a high-ranking tier 2 settlement to ensure the spatial strategy of the plan can deliver the Local Plan’s housing requirements in sustainable locations and that objectives 2 and 3 of the plan (amongst others) are achieved.
- 2.4. Minor alterations are required to ensure that the Plan is effective in delivering the vision and objectives.

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

- 2.5. It is considered that Chorley Town is under-represented and should be apportioned more growth as the highest performing settlement in Chorley Borough (Key Service Centre/Tier 2 settlement). The distribution of development of the Local Plan is therefore not considered to be reflective and suitably representative of the settlement hierarchy set out in Table 1 of the proposed Local Plan.
- 2.6. 721 no. dwellings are proposed on allocated sites in Chorley Town – of a total 2,715 proposed dwellings on allocated sites (under Policy HS2). Chorley’s housing requirement (which requires updating to reflect the latest local housing need/standard method requirement at the very least) is stated to be 6,012 homes across the plan period or 334 dwellings per annum under Policy HS1. Chorley Town will therefore deliver 27% of overall ‘planned’ growth. **Table 1** overleaf shows how this compares with other, lower ranking settlements in the hierarchy which are less sustainable.
- 2.7. This point was further clarified in the Councils’ response to ID01 (ref: CLAO3) which confirms that within Chorley and South Ribble, the tables illustrate higher housing numbers in Tier 5 than Tier 4. However, this is reflective of the availability of land in those areas and a greater number of settlements in Tier 5 than Tier 4. Also, some of these numbers relate to sites already granted planning permission.

Table 1: Proposed Allocations/development distribution by Settlement – Chorley Borough

Settlement	Tier	Proposed number of dwellings/allocated growth	% of overall allocated growth
Chorley Town	2	721	27
Adlington	3	310	11
Whittle le Woods	3	521	19
Clayton - le Woods	3	447	16
Coppull	3	207	8
Euxton	3	100	4
Eccleston	4	81	3
Croston	4	2	0
Mawdesley	5	122	4
Bretherton	5	26	1
Brinscall	5	12	0
Charnock Richard	5	117	4
Wheelton	5	49	2
Total	-	2715	100%
Tier 2		721	27
Tier 3		1585	58
Tier 4		83	3
Tier 5		326	12

2.8. The following points are of note:

- Despite Chorley being the highest performing/most sustainable settlement, the Tier 3 settlements as a whole will deliver a higher proportion of growth. Whilst it is noted that growth will be distributed across a number of settlements within the tier 3 category, Chorley as a highly sustainable settlement is well suited to deliver higher levels of development – which will be required, noting the current housing need figure for Chorley needs to be increased.
- Only 45% of Chorley Borough’s housing growth will be delivered via allocations in the Local Plan (noting 2,715 allocated dwellings against the current suggested housing target of 6,012 across the plan period). This is considered optimistic at best and comprises a high-risk strategy – relying on windfall development and existing commitments in a Borough which is highly constrained by Green Belt. Additional housing allocation numbers will clearly provide more comfort to ensure housing needs will be suitably met and to ensure the Council do not find themselves in a five-year housing land supply shortfall again in the very near future.
- Chorley Town is surrounded by Green Belt on all sides – except to the east, where Little Knowley Farm is located. It is therefore a constrained settlement, with limited areas for expansion without further loss of Green Belt land, unless further development is directed to its east. The Local Plan therefore needs to appropriately plan for this to ensure a genuine plan-led system which ensures development is delivered in the most appropriate locations.

- We also raise concerns regarding the overall re-distribution strategy of the plan – which results in Chorley Borough set to deliver significantly below the local housing need (LHN) figure set by national government. As explained in our earlier representations, the re-distribution strategy undertaken as part of the duty-to-cooperate does not reflect the findings of the LHN for Chorley, nor does it reflect the recommendations of the Housing Study Update (Reference: H009) which also broadly aligns with the LHN housing figures. Chorley’s re-distributed housing figure is only 60% of its overall requirement identified by the Government’s latest LHN calculation. This is not justified or supported by the evidence base. The re-distribution needs to be revised to direct more residential development towards Chorley, as advocated by the Council’s own evidence and also the Government’s LHN standard method calculation.

2.9. Noting these points, the availability of land appears to have been the driver, not the distribution reflecting the hierarchy. It is considered that more growth should be directed to Chorley Borough and Chorley Town – and that the wider Little Knowley Farm site should be allocated for housing in its entirety.

2.10. This will ensure that the Plan is positively prepared and justified based on the evidence.

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

2.11. Yes – in principle, although Chorley Town as the largest urban settlement is under-represented and should be attributed more growth to ensure development requirements will be delivered in the most sustainable manner and that the plan is positively prepared.

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

2.12. For the Local Planning Authority to confirm. We repeat our earlier comment that the spatial strategy/development distribution has not been reasonably informed by the settlement hierarchy, noting that Chorley Town is under-represented and the availability of land has been identified by the Council

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

2.13. No comment.

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

2.14. No comment.

3. Question 2.5

2.5: 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?

- 3.1. Castle Green has concerns regarding the site selection process, particularly in relation to the Little Knowley Farm site. In short, it is not transparent (or indeed justified) as to why the Council has decided to arbitrarily reduce the draft HS2.10 allocation by around half compared to the wider land parcel that has been assessed in the evidence base and deemed to be suitable for development.
- 3.2. The Strategic Housing and Economic Land Availability Assessment (SHELAA) – Reference: HO14a, assesses the suitability, availability, and achievability of sites taken forward following the Stage 1(b) assessment. Thereafter, the SHLEAA outlines an overall assessment for each site, based on the results of the suitability, availability, and achievability assessments. This seeks to identify the development potential of each site over the plan period. It sets out in paragraph 3.24 that *“Following the detailed assessments a number of sites were discounted as they were identified as not being suitable, available, and/or achievable. Appendix 3 includes a schedule of these sites along with the reason they were discounted”*
- 3.3. Various smaller parcels are identified within Appendix 1: Discounted Stage 1(b) sites of the SHELAA (Reference: HO15b), covering the Castle Green site (ref: 19C109, 19C120 and 19C393ax). See relevant extract at **Figure 3** below.

Figure 3: Extract of SHLEAA Assessment of Little Knowley Farm

Site Profile 47

Site Details

SHELAA Reference(s)	19C393a, 19C069, 19C109, 19C120, 19C393ax
Local Authority	Chorley Council
Site Name	Little Knowley Farm
Settlement	Chorley
Ward	Chorley North & Astley
Size (Ha)	24.42
Current Use	Greenfield

Location Map



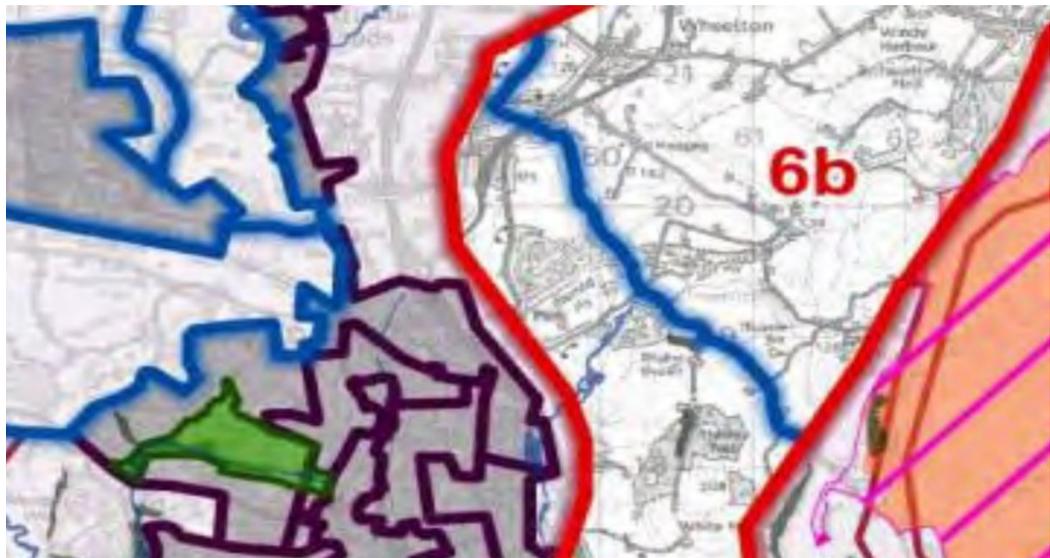
- 3.4. Each parcel sets out that the “entire site taken forward under 19C393a”. There is no separate assessment of the proposed allocated element of Little Knowley Farm (i.e. draft allocation HS2.10 as currently proposed) and that which is not taken forward (**Figure 3**).
- 3.5. The conclusion within Appendix 4: suitable, available and achievable sites, confirms that parcel 19C393a [i.e. the entire parcel], is simply confirmed as a proposed allocation ref: HS2.10.
- 3.6. Furthermore, the Integrated Assessment of the Plan (CDO6) considers allocation HS2.10 and again references 19C393a, so the entire site.
- 3.7. In short, there is no evidence as to why the Council has decided to arbitrarily reduce the draft Little Knowley allocation by half – the Council’s own evidence base confirms that the **whole site** is suitable, available and achievable.
- 3.8. Noting our earlier comments at question 2.1, Chorley Town is highly suitable to accommodate higher levels of growth and Chorley Borough’s housing need requirement at the very least needs to be updated to reflect the latest standard method figure. The approach to only allocate sites to meet 45% of Chorley’s housing requirement, with the remainder being windfall or other commitments, is highly optimistic. It is therefore entirely logical that the entire Little Knowley Farm site – which is not located within the Green Belt, is allocated for housing and that draft allocation HS2.10 is updated to reflect this.
- 3.9. Furthermore, there are other flaws in the evidence base which further points to the site selection not being transparent or clear as to why the wider Little Knowley Farm site is not proposed for allocation – which we address below.
- 3.10. The element of the Plan relating to allocation HS2.10 is not positively prepared, justified and is not justified based on the evidence.

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

- 3.11. The evidence base is contradictory on this matter. At paragraph 1.3, the Housing and Employment Allocations: Site Selection process (Reference: HO15) confirms that the site selection process draws on the information in the SHELAA. Paragraph 3.4 of the report sets out that in accordance with Stage 1(b) of the SHELAA methodology, sites were discounted if they were ‘affected by numerous constraints’.
- 3.12. This does not reflect the SHELAA. Paragraph 2.13 of the SHELAA is clear in confirming that *“Sites that are somewhat affected by one (or a combination) of the above constraints (i.e. partially constrained sites) were taken forward to Stage 2 in order to gain a more detailed understanding of the extent to which they may or may not be suitable for development.”*
- 3.13. Castle Green also raise concerns with paragraph 4.1 of the site selection paper, as allocations do not fully reflect the findings of the Stage 2 assessment, certainly in relation to parcel ref: 19C393a – Little Knowley Farm, as it is only partially allocated for development, despite being assessed as a whole as being suitable, available and achievable.
- 3.14. The weighting system is unclear and we again reiterate that the site selection process in respect of Little Knowley Farm being partially allocated is not transparent nor justified by the evidence base. The following additional points are of note on this matter:

- Page 44 of the Heritage Impact Assessment (Reference: HE01A), which informs the site selection process, confirms that the entire Little Knowley Farm site (ref: 19c393a) *“provides no contribution to the significance of the heritage asset and it’s setting therefore development of the site will have no impact on the heritage asset.”*
- Little Knowley Farm is located within the West Pennine Foothills area (LCA 6b), which is assessed in landscape terms in the Open Land Designations Study: Landscape Assessment (Reference: EVO9A). **Figure 4** confirms there are no absolute constraints on the site, just noting the blue line to the east of the site is a break between the sub areas.

Figure 4: Little Knowley Farm – Extract from West Pennine Foothills Assessment



- The entire Little Knowley Farm site is assessed as part of sub area 6Bii¹, with the detailed assessment confirming that *“the landscape is not considered to have ‘above ordinary’ landscape value”*. Appendix B of the report (Reference: EVO9C) provides settlement setting assessments. Little Knowley Farm is included within the Great Knowley area (see page 76). The overall conclusions on page 78 are that the *“landscape setting makes a limited contribution to the character of Great Knowley”*. Therefore, the specific site assessment does not indicate that the Little Knowley Farm site performs strongly from a landscape perspective – that being from the assessed in respect of landscape value and also settlement setting. Again, there is no justification as to why the eastern land parcel of Little Knowley Farm has been discounted and only the western section selected for allocation.
- The Habitat Regulations Assessment (Reference: CD07) confirms that the whole Little Knowley Farm site (Reference: 19C393a) is not constrained from an ecological perspective. This is confirmed at pages E-11 and E-71 and also no reference is made to wintering birds (which is stated in the draft policy for HS2.10).
- Chapter 5 of the Integrated Assessment (Reference: CD05) covers site assessments. Again, in respect of Little Knowley Farm (Ref:19C393a), it is clear that the site was

¹ See page 67 of Appendix A (Reference: EVO9B).

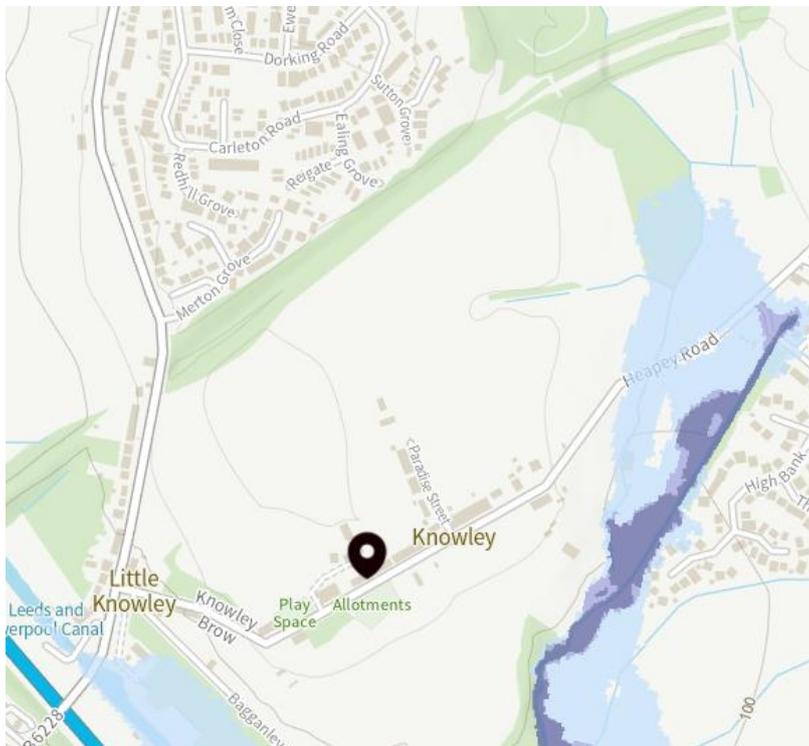
assessed as a whole, not the parcel which has been taken forward for allocation. It is also noted that the wider parcel performs reasonably well from a sustainability perspective and is not identified as one of 15 less sustainable options identified in paragraph 5.45 of the report. Again, it is unclear why the Council has only partially allocated Little Knowley Farm and discounted the entire site as a suitable housing allocation.

- 3.15. All of the above points to an unclear site selection process in respect of Little Knowley Farm. It is not clear what weighting has been attributed to site constraints and why only part of the site is allocated.
- 3.16. To conclude, the decision to allocate only the western section of Little Knowley Farm is not supported by the evidence base – which confirms the entire parcel is a suitable, available and deliverable site.
- 3.17. The entire Little Knowley Farm site should be allocated for housing – and allocation HS2.10 updated/enlarged to reflect the findings of the evidence base.
- 3.18. As drafted, this not justified and based on the evidence.

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?

- 3.19. No detailed comments to make on this matter – other than to note that should the Council be concerned regarding a very small section of the wider Little Knowley Farm site being located in Flood Zone 2 (see light blue area at eastern extent of the site at **Figure 5** overleaf), the small area of Flood Zone 2 can easily be removed from the red line site allocation area. This would remove any doubt that the site is sequentially preferable/acceptable in flood risk terms – noting that the entire site is also at very low risk of surface flood water.

Figure 5: Extract of EA online flood mapping – Little Knowley Farm



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

- 3.20. No detailed comments to make on this matter – other than to note that nearly the entire Little Knowley Farm site is classified as urban (therefore non-agricultural) on Natural England’s regional Agricultural Land Classification Map. See Red Line Shading at **Figure 6** below.

Figure 6: Agricultural Land Classification – Little Knowley Farm



Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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