

# Central Lancashire Local Plan Examination

## Matters, Issues and Questions

### Matter 5 – Housing Allocations

**Issue 5 – Are the proposed housing allocations justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?**

**Note: This matter focusses on the merits of individual housing allocations, the process for selecting the sites is dealt with in Matter 2.**

### Housing Allocations – Chorley (Policy HS2)

#### **5.1 Do the sites allocated for residential development provide an appropriate range of sites in terms of their type and size?**

Yes, a range of sites are allocated under Policy HS2 in terms of their type and size.

#### Size

The size of the allocations varies from 0.09 to 18.58 hectares, with the number of dwellings allocated on these sites ranging from 2 to 332. The allocations are therefore considered to provide an appropriate range of sizes.

Please note an error has been identified with the site area for allocation HS2.10 in the submission CLLP. The site area was significantly reduced through the SHELAA process however the site area in the submission CLLP still reflects the original site area. The correct site area is 6.98 hectares. This does not have any implications for the allocation as the site boundary shown on the policies map is correct and the yield is based on the correct site area.

Paragraph 70 of the NPPF (2023) states that to promote a good mix of sites local planning authorities should “*Identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare*”. The SHELAA did not apply a size threshold therefore sites of all sizes were considered and assessed for housing allocation through the SHELAA process. All sites assessed as being suitable, available and achievable were allocated in Policy HS2. Of the 37 sites allocated, 15 have a site area of one hectare or less. The total number of dwellings allocated on these 15 sites is 228.

In addition to the allocations, the supply is made up of ‘non allocated existing commitments’ which are sites with planning permission not included as allocations. There are 479 dwellings left to be built (at 1<sup>st</sup> April 2025) on the sites identified within this element of the supply that are one hectare or less.

The total supply from sites of one hectare or less is 707 dwellings. This is 11.8% of the total housing requirement for Chorley (6,012 dwellings), therefore the requirements of the NPPF in relation to small sites have been met.

## Type

The allocations in Policy HS2 provide a broad range of sites, including a mix of brownfield and greenfield sites and a mix of sites within both urban and rural locations across Tiers 1-5 of the settlement hierarchy.

Policy HS6 sets out the requirements for the housing mix and density of residential developments, Policy HS7 sets out the requirements for affordable housing, Policy HS11 sets out the requirements for self-build and custom-build housing and Policy EN1 sets out the requirements for design and space standards. These policies will ensure a range of house types, tenures and sizes will be provided on the allocated sites, and on any windfall sites that come forward during the plan period.

## **5.2 Is each site allocated for residential development sound? In particular:**

Each allocation is considered sound. Further justification is provided below.

### **a) Have the site constraints been appropriately taken into account in the allocation of the site?**

The site selection process undertaken through the development of the CLLP, has been based on a comprehensive appraisal of sites. This appraisal of sites was carried out through the SHELAA, with the methodology developed and agreed by the CLAs in line with national guidance. The SHELAA provides a complete audit of available land by identifying all the sites available for development across Central Lancashire and assessing their suitability for different uses. The assessments included consideration of relevant constraints and their potential to be mitigated.

The site assessment profiles for the Chorley sites are provided in SHELAA Appendix 5 ([HO14c](#)). They detail how the constraints have been considered and assessed for each site, and, where relevant, identify potential mitigation measures that may be needed.

Additional information has been drawn from other evidence, including Strategic Flood Risk Assessments (SFRA) (FR01-FR04).

Three allocations are accompanied by Key Development Considerations (KDCs) (see CLLP Appendix 4) ([CD01](#)) that detail how the identified constraints should be mitigated through development proposals, including early engagement with service/ infrastructure providers, scheme design and the use of planning obligations. Key development considerations were not considered necessary for all allocations, as many already have planning permission and/or do not have any identified constraints. They have only been prepared for the larger allocations where there are known constraints and/or other issues that make developing the site more complex i.e. the site is in multiple ownership.

A number of representations were received to the Regulation 19 CLLP consultation raising issues and constraints with sites. All of these were addressed through the SHELAA process.

**b) Are the various requirements set out in the policy clear, justified and effective?**

Yes, the requirements of Policy HS2 are clear, justified and effective.

Policy HS2 identifies 37 sites that are allocated and protected for housing development, and that for 3 sites, marked by an asterisk, development meeting the KDCs set within Appendix 4 will be supported. It also identifies the sites, marked by a #, where a planning application is required to be accompanied by a wintering bird survey in accordance with Policy EN7. The requirements of Policy HS2 are therefore clear. For allocations without KDCs, requirements set out in other policies in the CLLP will apply. It is not appropriate to identify all these requirements in Policy HS2 and it is not considered necessary to do so as the CLLP should be read as a whole.

The site allocations are justified, because they have been identified through a robust assessment process (SHELAA (HO14)), taking into account all reasonable alternative sites and based on proportionate evidence. The policy is also effective because the sites have been assessed as being deliverable over the plan period and identified through effective joint working between the CLAs (and their partners).

**c) Have the indicative yield, development mix and viability considerations been adequately addressed?**

Yes, these considerations have been adequately addressed when selecting sites for allocation and determining the development potential of each allocation.

The SHELAA report ([HO14a](#)) details how sites were assessed. The site assessments were informed by the specialist views of key organisations (including LCC Highways, Environment Agency etc). Alongside this, the assessments included an appraisal of constraints, realistic capacities and development potential. Section Two of the report details the following within the methodology:

- GIS mapping was used to calculate the quantum of land that is suitable for development within partially constrained sites. To estimate the development potential (i.e. yield) of sites proposed for housing a density multiplier (i.e. a dwellings per hectare figure) was applied to the developable area of sites (i.e. the 'gross site area' where a site is unconstrained, or the 'net developable site area' where a site is partially constrained). The density multiplier applied was dependent on a site's location, context and surrounding built form. The Central Lancashire Density Study ([HO05](#)) was the starting point for selecting an appropriate density for each site.
- Housing potential was therefore estimated using the following formula: Density Multiplier x Developable Area\* = Housing Potential (units) (\* the 'net developable site area' where a site is partially constrained, or the 'gross site area' where a site is unconstrained).
- If a landowner or site promoter has prepared a masterplan or provided information to the Council regarding their proposed yield, this was used to inform density assumptions (where agreed by the Council). Equally, if planning permission has been previously granted, or a planning application was under consideration, the quantum of development approved/proposed within the planning application was assumed to constitute the development potential of a site.

The Viability Assessment ([CD13/IT05](#)) included a whole plan viability assessment of the draft policies and proposed site allocations within the emerging CLLP. For the non-strategic residential allocation sites, the appraisals considered the viability of greenfield and brownfield sites in different value zones. In Chorley there is a small area

within the lower value zone which is considered unviable. None of the housing allocations are located in this area, therefore they are all identified as being viable.

A site promoter survey took place in August 2024, which sought information from those promoting sites being considered for allocation in relation to proposed yields, development timescales and other considerations including feasibility and viability. None of the site promoters that responded identified viability issues.

The number of dwellings on each allocation within Policy HS2 are indicative based on evidence. Whilst some Regulation 19 representations have requested a change to the figures, each site capacity is intended to be indicative only and may ultimately be revised through planning applications.

**d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?**

The four SHELAA Call for Sites consultations sought information from respondents on known infrastructure constraints/requirements. Additional information on infrastructure requirements was identified through desktop reviews, and through the assessments provided by specialists/stakeholders including Lancashire County Council as the Highways Authority, United Utilities and the Environment Agency.

Additional evidence studies, including the Strategic Flood Risk Assessment and the Transport Study, have also been used to understand infrastructure needs.

A number of the allocations already have full planning permission, therefore the infrastructure requirements have already been assessed through the planning application process and secured via conditions or a legal agreement.

Furthermore, the Council has liaised with the site promoters of the housing allocations to understand their deliverability. This was done through the site promoter survey in August 2024, the housing land monitoring and five year supply work and through further contact with site promoters to seek any update of their responses to the site promoter survey.

Based on the findings of the SHELAA and other evidence base studies, the Council considers all the allocations in Policy HS2 to be deliverable.

The CLAs are committed to continuing to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation.

Policy ID1 and ID2 set out the CLAs requirements for infrastructure and planning obligations.

**e) Is there evidence that the development of the allocations is viable and developable during the plan period?**

Yes, the SHELAA ([HO14a](#)) methodology details how sites were assessed as developable – i.e. “*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* (NPPF (2023) Annex 2)”. All sites that were determined to be available and developable within Chorley have been included as housing allocations.

A whole plan viability assessment ([CD13/IT05](#)) has been undertaken. For the non-strategic residential allocation sites, the appraisals considered the viability of greenfield and brownfield sites in different value zones. In Chorley there is a small area within the lower value zone which is considered unviable. None of the housing allocations are located in this area, therefore they are all identified as being viable.

**f) Are there any omissions in the policy, and is it sufficiently flexible?**

The Council does not consider that there are any omissions in Policy HS2. The sites have been identified through a robust SHELAA process, which has included four Call for Sites consultations and then the assessment of all sites suggested to the Council as well as additional sites identified by the Council. The assessment of those sites has been transparently documented through the SHELAA evidence.

The CLAs note that through the Regulation 19 consultation a number of representations have been received objecting to the omission of specific sites. The SHELAA, and its accompanying appendices, set out the reasons for the exclusion of the sites and they are not an omission of the policy.

Policy HS2 is sufficiently flexible. It details the sites allocated and protected for housing development and clearly states, for those sites that have KDCs, they will be considered in line with the KDCs of Appendix 4. The KDCs provide the appropriate guidance and sufficient flexibility to ensure development proposals respond to identified constraints

but without being wholly prescriptive. Irrespective of whether a housing allocation site is accompanied by KDCs, the CLLP should be read as a whole.

Through the Regulation 19 consultation, some requests were made by Historic England (D02.16), National Grid (D05.4) and United Utilities (D15.02-03) for the inclusion of specific, detailed requirements within the KDCs. However, these matters are addressed through other policies, including EN13, and through the development management process, and therefore changes are not considered necessary.

**5.3 Does the policy provide sufficient information on site specific constraints and requirements such as the physical and social infrastructure that may be required as part of the development?**

Yes, Policy HS2 makes clear that proposals on allocations identified by an asterisk will be considered against the Key Development Considerations set out within Appendix 4. The KDCs have been identified through the CLLP's evidence (including the SHELAA (HO14)) and set out expectations for development, including that relating to physical and social infrastructure. Each of the KDCs reference the related policies of the plan.

In identifying site specific constraints and physical and social infrastructure requirements, the Council have engaged with infrastructure and service providers, and these are reflected within the CLLP and detailed in the supporting evidence.

Irrespective of whether a residential allocation site is accompanied by a KDC, the CLLP should be read as a whole and other planning policies address specific aspects of physical and social infrastructure, including Policy HS5 (Open Space, Sport, Recreation and Playing Pitch Requirements), HC3 (Community, Health and Education Facilities), EN5 (Green Infrastructure) and EN10 (Development and Flood Risk). Additionally, Policy ID1 guides infrastructure planning principles and Policy ID2 sets expectations in relation to developer contributions and planning obligations. This provides the wider framework for the consideration of proposed developments on residential allocations.

The CLAs are committed to continuing to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. This includes that which shall be secured through planning obligations as part of a planning application. Those specific requirements will be identified in consultation with infrastructure bodies e.g. highways, utilities, education and health, through the planning application process, and ensures that proposals can respond to the most-up-to date needs.

The Central Lancashire Infrastructure Delivery Plan Update([ID08](#)) and Schedule ([ID09](#)) will also be used to identify physical and social infrastructure requirements.

The CLAs are aware that many of the objections to housing allocations cited concerns about social and physical infrastructure, but the CLAs have considered these matters throughout the preparation of the CLLP and have been responded to by the CLAs in [CD10](#).

## **Housing Allocations – South Ribble (Policy HS3)**

### **5.4 Do the sites allocated for residential development provide an appropriate range of sites in terms of their type and size?**

Yes. The residential allocation sites under Policy HS3 provide a range of sites in terms of type and size.

NPPF Paragraph 69 (2023) (or paragraph 72 (2024)) states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

NPPF Paragraph 70 (2023) (or paragraph 73 (2024)) states that to promote a good mix of sites local planning authorities should: *Identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.*

#### Small sites

In acknowledgement of NPPF paragraph 70 (2023), no size threshold was applied through the SHELAA when assessing sites for residential use. Following a Call for Sites exercise and a desktop-based exercise (stage 1(a)), 368 sites in South Ribble were initially identified through the SHELAA (although total site numbers contain duplicate sites owing to the receipt of multiple site suggestions). Sites were then assessed, and some discounted, in line with the staged methodology of the SHELAA ([HO14a](#)).

Many of the sites ultimately discounted through the SHELAA assessments included those sites with smaller site areas. Grounds for rejection included their unavailability, unsuitability, and land constraints (e.g. flood risk) or designations (e.g. Green Infrastructure). In some cases, the sites already benefited from planning permission and so were discounted from further consideration. The SHELAA ([HO14b](#), [HO14e](#)) detail why sites were discounted.

In total, 33 sites in South Ribble made the final selection. Following the merging of some of those sites into larger parcels, a total of 19 sites have been identified for allocation within the CLLP, comprising HS3.1-HS3.19. Additional residential allocations include strategic site SS6A & B, and mixed-use site EC6.1. Allocations range from sites with 5 to 1350 dwellings.

The CLLP allocates land for 4,448 dwellings in South Ribble, (EC6.1, SS6A & B, HS3.1-HS3.19), of which 53 dwellings are allocated on sites of less than 1 hectare in size (HS3.15-HS3.19), equating to 1.2%.

Thus, the CLAs did consider the allocation of small sites but ultimately, following the assessment of sites through the SHELAA process, the majority of identified small sites were not determined suitable, available or achievable to take forward for allocation.

SRBC therefore expect the 10% housing requirement on small sites (less than 1 hectare) to be delivered through extant sites with planning permission (committed sites) and windfall sites.

The South Ribble housing requirement within the CLLP (2023-2041) is 8280 units, of which 10% would be 828 units. Forecasts show that 1058 units are expected on sites of less than 1 hectare, which equates to 13% of the housing requirement. In addition to those units already completed, and those on committed and allocated sites, the CLAs remain confident, supported by analysis of historic evidence, that a consistent supply of small sites will be delivered through windfall.

Completion figures for small sites (<1ha) can be monitored through the CLA's annual monitoring reports.

### Types

Residential supply is provided through a broad range of allocated, committed and windfall sites, ranging in size (1-1350 dwellings), land status (brownfield/greenfield), location (across Tiers 1-5) and distribution (urban and rural areas).

Policy HS6 provides expectations around the housing mix and density of residential developments, Policy HS7 on affordable housing, Policy HS11 on self-build and custom-build housing and Policy EN1 on design and space standards. The plan provides flexibly for a range of residential types and sizes.

**5.5 Is each site allocated for residential development sound? In particular:**

Yes, each residential development allocation is sound. Further justification is provided below.

**a) Have the site constraints been appropriately taken into account in the allocation of the site?**

The site selection process undertaken through the development of the CLLP, has been based on a comprehensive appraisal of sites. This appraisal of sites was carried out through the SHELAA, with the methodology developed and agreed by the CLAs in line with national guidance. The SHELAA provides a complete audit of available land by identifying all the sites available for development across Central Lancashire and assessing their suitability for different uses. The assessments included consideration of relevant constraints and their potential to be mitigated.

The site assessment profiles for the South Ribble sites are provided through SHELAA Appendix 7 ([HO14e](#)) and detail how the constraints have been considered and assessed for each site, and, where relevant, identifying potential mitigation measures that may be needed.

Additional information has been drawn from other evidence, including Strategic Flood Risk Assessments (SFRA) (FR01-FR04).

The larger of the allocation sites in South Ribble (SS6, EC6, HS3.1-HS3.9) are then accompanied by Key Development Considerations (CLLP Appendix 4 ([CD01](#))) that detail how the identified constraints should be mitigated through development proposals, including early engagement with service / infrastructure providers, scheme design and the use of planning obligations.

Key development considerations were not considered necessary for all allocations. They have only been prepared for the larger allocations where there are known constraints and/or other issues that make developing the site more complex e.g. the site is in multiple ownership.

**b) Are the various requirements set out in the policy clear, justified and effective?**

Yes, the requirements of Policy HS3 are clear, justified and effective.

Policy HS3 confirms that 19 sites are allocated and protected for housing development, and that for 9 sites, marked by an asterisk, development meeting the KDCs set within Appendix 4 will be supported. It also cross-references requirements to wintering birds set by Policy EN7. Therefore, the requirements of Policy HS3 are clear.

Requirements set out in other policies in the CLLP will apply to developments on the allocated sites. It is not appropriate to identify all these requirements in Policy HS3 and it is not considered necessary to do so as the plan should be read as a whole. The KDCs provide cross-reference to the specific policy that relates to each KDC.

The site allocations are justified, because they have been identified through a robust assessment process (SHELAA (HO14)), taking into account all reasonable alternative sites and based on proportionate evidence. The policy is also effective because the sites have been assessed as being deliverable over the plan period and identified through effective joint working between the CLAs (and their partners).

**c) Have the indicative yield, development mix and viability considerations been adequately addressed?**

Yes, these considerations have been adequately addressed when selecting sites for allocation and determining the development potential of each allocation.

The SHELAA report ([HO14a](#)) details how sites were assessed. The site assessments were informed by the specialist views of key organisations (including LCC Highways, Environment Agency etc). Alongside this, the assessments included an appraisal of constraints, realistic capacities and development potential. Section Two of the report details the stage methodology as including:

- GIS mapping was used to calculate the quantum of land that is suitable for development within partially constrained sites. To estimate the development potential (i.e. yield) of sites proposed for housing a density multiplier (i.e. a dwellings per hectare figure) was applied to the developable area of sites (i.e. the 'gross site area' where a site is unconstrained, or the 'net developable site area' where a site is partially constrained). The density multiplier applied was dependent on a site's location, context and surrounding built form. The Central Lancashire Density Study ([HO05](#)) was the starting point for selecting an appropriate density for each site.

- Housing potential was therefore estimated using the following formula: Density Multiplier x Developable Area\* = Housing Potential (units) (\* the 'net developable site area' where a site is partially constrained, or the 'gross site area' where a site is unconstrained).
- For sites where a mix of housing and economic development uses are proposed (and assessed as being potentially appropriate) a density multiplier was applied to the portion of the developable area put forward for housing.
- If a landowner or site promoter has prepared a masterplan or provided information to the Council regarding their proposed yield, this was used to inform density assumptions (where agreed by the Council). Equally, if planning permission has been previously granted, or a planning application was under consideration, the quantum of development approved/proposed within the planning application was assumed to constitute the development potential of a site.

The CLA's Viability Assessment ([IT05](#)) included a whole plan viability assessment of the draft policies and proposed site allocations within the emerging CLLP. For the non-strategic residential allocation sites, the appraisals considered the viability of greenfield and brownfield sites in different value zones – sites in South Ribble were deemed to be viable.

A site promoter survey took place in August 2024, which sought information from those promoting sites being considered for allocation in relation to proposed yields, development timescales and other considerations including feasibility and viability. None of the site promoters that responded identified viability issues.

Figures for the number of dwellings on each allocation site, provided within Policy HS3 and EC6, are indicative based on evidence. Whilst some Regulation 19 representations have requested increases to the figures (e.g. A69, A71, D04.15-16), each site capacity is intended to be indicative only and may ultimately be revised through planning applications.

**d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?**

The four SHELAA Call for Sites consultations sought information from respondents on known infrastructure constraints / requirements, and identified additional information

through desktop reviews, and through the assessments provided by specialists / stakeholders including Lancashire County Council as the Highways Authority, United Utilities and the Environment Agency.

Additional evidence studies, including Strategic Flood Risk Assessments and highway / transport assessments, have also been used to understand infrastructure needs.

The Council has also liaised with the site promoters of the housing allocations to understand their deliverability, including in respect of infrastructure. This was done through the site promoter survey in August 2024, the housing land monitoring and five year supply work and through further contact with site promoters to seek any update of their responses to the site promoter survey. The Council's latest surveys (Spring 2025), to inform five-year supply forecasts, included questions in respect of infrastructure delivery and identifying any other known constraints.

Based on the findings of the SHELAA and other evidence base studies, the CLAs consider assumptions regarding infrastructure requirements to be realistic and deliverable. Infrastructure requirements are set through policies and/or the accompanying KDCs.

However, the CLAs acknowledge that some sites do have more complex issues than others, and the CLAs understand the concerns raised by some infrastructure providers in relation to specific sites. For example, United Utilities (D15) have raised concerns in relation to drainage issues affecting Chapel Lane, Longton. In these cases, the CLAs remain committed to working with all relevant parties to address concerns through the planning process, and the policies / KDCs contain relevant requirements to enable this (informed by Strategic Flood Risk Assessments (FR01-FR04)), for example by necessitating a site-wide Masterplan or Infrastructure Delivery Plans to demonstrate how drainage mitigation will be provided.

A number of the allocations already have planning approvals granted, or applications pending determination, and so have provided details of infrastructure through the planning application. Associated infrastructure requirements have/may also be secured via conditions or a legal agreement.

The CLAs are committed to continuing to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. These bodies will also be consulted as part of subsequent planning applications.

Policy ID1 and ID2 set out the CLA's requirements for infrastructure and planning obligations.

**e) Is there evidence that the development of the allocations is viable and developable during the plan period?**

Yes - the CLAs' SHELAA ([HO14a](#)) methodology details how sites were assessed as developable – i.e. *“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 (NPPF (2023) Annex 2)”*. All sites that were determined to be available and developable within South Ribble have been included as residential allocation sites.

Whilst viability assessments have not been undertaken for individual residential allocation sites, a whole plan viability assessment ([IT05](#)) concluded sites in South Ribble to be viable (paragraph ES29).

**f) Are there any omissions in the policy, and is it sufficiently flexible?**

The CLAs do not consider that there are any omissions in the policy. The sites have been identified through a robust SHELAA process, which has included four Call for Sites consultations and then the assessment of all site suggestions. The assessment of those sites has been transparently documented through the SHELAA evidence (HO15a-f).

The CLAs note that through the Regulation 19 consultation a number of representations have been received objecting to the omission of specific sites. The SHELAA, and its accompanying appendices, set out the reasons for the exclusion of the sites and they are not an omission of the policy.

Policy HS3 is sufficiently flexible. It details the sites allocated and protected for housing development and clearly states they will be considered in line with the KDCs of Appendix 4, where relevant. The KDCs provide the appropriate guidance and sufficient flexibility to ensure development proposals respond to identified constraints but without being wholly prescriptive.

Through the Regulation 19 consultation, some concerns were raised that the supply, including the HS3 allocations, lacks a surplus to allow flexibility and disregards development opportunities ([A55.4](#)). This does not relate to the flexibility of Policy HS3 itself, but the wider housing strategy which falls under Matter 3.

Through the Regulation 19 consultation, some requests were made by Historic England (D02.16), National Grid (D05.4) and United Utilities (D15.02-03) for the inclusion of specific, detailed requirements within the KDCs. However, these matters are addressed through other policies (including EN13) and will be addressed through the development management process. Changes to the KDCs are therefore not considered necessary.

**5.6 Does the policy provide sufficient information on site specific constraints and requirements such as the physical and social infrastructure that may be required as part of the development?**

Yes – Policy HS3 (2) makes clear that proposals on allocations identified by an asterisk (HS3.1-HS3.9) will be considered against the Key Development Considerations set out within Appendix 4. The KDCs have been identified through the CLLP’s evidence (including the SHLAA (HO14)) and set out expectations for development, including that relating to physical and social infrastructure. Each of the KDCs reference the related policies of the plan.

In identifying site specific constraints and physical and social infrastructure requirements, the CLAs have engaged with infrastructure and service providers to identify both constraints and needs, and these are reflected within the plan and detailed in the supporting evidence.

Irrespective of whether a residential allocation site is accompanied by a KDC, the CLLP should be read as a whole and other planning policies address specific physical and social infrastructure – including Policy HS5 and HC5 (Open Space, Sport, Recreation and Playing Pitch Requirements), HC3 (Community, Health and Education Facilities), EN5 (Green Infrastructure) and EN10 (Development and Flood Risk).

Additionally, Policy ID1 guides infrastructure planning principles and Policy ID2 sets expectations in relation to developer contributions and planning obligations. This provides the wider framework for the consideration of proposed developments on residential allocations.

The CLAs are committed to continuing to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. This includes that which shall be secured through planning obligations as part of a planning application. Those requirements will be identified in consultation with infrastructure bodies – e.g.

highways, utilities, education and health - through the planning application process, and ensures that proposals can respond to the most-up-to date needs.

The Central Lancashire Infrastructure Delivery Plan ([ID08](#)) and Schedule ([ID09](#)) will also be used to identify physical and social infrastructure requirements.

The CLAs are aware that many of the objections to housing allocations cited concerns about social and physical infrastructure, but the CLAs have fully considered these throughout the preparation of the CLLP.

### Housing Allocations - Preston (Policy HS4)

#### **5.7 Do the sites allocated for residential development provide an appropriate range of sites in terms of their type and size?**

NPPF Paragraph 70 (2023) (or Paragraph 73 (Dec 2024)) states that to promote a good mix of sites local planning authorities should: *Identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.*

Of the 6459 units (2,767 units at SS3, 300 units at SS4, 450 units at SS5 within the plan period, and 2,942 units under allocations in Policy HS4) allocated in the plan within the plan period (some of SS3 may continue to be delivered after the plan period), the following are allocated on sites under 1 ha:

Ref	Location	site area	no. dwellings
HS4.7	The Larches, Larches Lane	0.91	15
HS4.8	115 Church Street*	0.1	57
HS4.9	37 -41 Church Street	0.06	29
HS4.10	Moor Park Depot, Moor Park Avenue	0.36	17
HS4.16	Bretherens Meeting Room	0.53	12
HS4.18	Former St Joseph's Orphanage, Theatre Street	0.38	67
HS4.19	Avenham Street Car Park	0.55	294
HS4.20	Grimshaw Street/ Queen Street	0.97	146
HS4.21	Former Byron Hotel, Grimshaw Street	0.09	28

Ref	Location	site area	no. dwellings
HS4.22	Mount Street/ Garden Street	0.06	47
HS4.25	25&27 Whittingham Lane and land to the rear of 25-31 Whittingham Lane Broughton	0.82	8
HS4.27	50 Lancaster Road	0.02	5
HS4.28	10-12 Lancaster Road	0.01	5
HS4.29	Corner of Manchester Road & Church Street	0.35	167
HS4.30	Tulketh Crescent	0.32	24

921

This equates to 14.3% of sites allocated within the plan period, on sites under 1ha in size.

In addition to these allocations listed above, there are a large number of sites within the PCC area that have come through as windfalls. These are on sites of 10 units and below which contribute towards the supply of units on small sites. The figure was 347 units with extant permission as at April 2025 (following the application of a 10% discount in line with the SHELAA methodology).

Windfall sites such as those mentioned above will continue to provide a supply of smaller sites as they are quicker to take through the development management process than through Local Plan allocations and are allowed under Local Plan Policies SS1 within settlement boundaries and SS2 which focusses them in the Preston Urban Area first, before other smaller/more rural settlements.

There is a mix of housing allocations across the settlement hierarchy tiers and on greenfield and brownfield land. Policy HS6 provides expectations around the housing mix and density of residential developments, Policy HS7 on affordable housing, Policy HS11 on self-build and custom-build housing and Policy EN1 on design and space standards. The plan provides flexibly for a range of residential types and sizes.

**5.8 Is each site allocated for residential development allocation sound? In particular:**

**a) Have the site constraints been appropriately taken into account in the allocation of the site?**

The site selection process undertaken through the development of the CLLP, has been based on a comprehensive appraisal of sites. This appraisal of sites was carried out through the Central Lancashire SHELAA, with the methodology developed and agreed across the three authorities in line with national guidance. The SHELAA provides a complete audit of available land by identifying all the sites available for development across Central Lancashire and assessing their suitability for different uses. The assessments included consideration of relevant constraints and their potential to be mitigated. Appendix 6 ([HO14d](#)) of the SHELAA methodology documents the site profiles for the allocated sites in Preston under Policy HS4, detailing how the constraints have been taken into consideration for each site.

The larger of the allocations in Preston (without planning permission) are also accompanied by KDCs (see CLLP Appendix 4 ([CD01](#)) that detail how the identified constraints should be mitigated through development proposals, including early engagement with service / infrastructure providers, scheme design and the use of planning obligations.

KDCs were not considered necessary for all allocations. They have only been prepared for the larger allocations where there are known constraints and/or other issues that make developing the site more complex e.g. the site is in multiple ownership.

**b) Are the various requirements set out in the policy clear, justified and effective?**

Yes, the requirements of Policy HS4 are clear, justified and effective.

Policy HS4 confirms that 30 sites are proposed for allocation and protected for housing development, and that for sites, marked by an asterisk, development meeting the KDCs set within Appendix 4 will be supported. It also cross-references requirements to wintering birds set by Policy EN7. Therefore, the requirements are clear.

Requirements set out in other policies in the CLLP will apply to developments on the allocated sites. It is not appropriate to identify all these requirements in Policy HS4 and it is not considered necessary to do so as the Plan should be read as a whole. The KDCs provide cross-reference to the specific policy that relates to each KDC.

The site allocations are justified, because they have been identified through a robust assessment process (SHELAA (HO14 documents [a-e](#)), taking into account all reasonable alternative sites and based on proportionate evidence. The policy is also effective because the sites have been determined to be deliverable over the plan period and identified through effective joint working between the CLAs (and their partners).

**c) Have the indicative yield, development mix and viability considerations been adequately addressed?**

Yes, these considerations have been adequately addressed when selecting sites for allocation and determining the development potential of each allocation.

The SHELAA report ([HO14a](#)) details how these issues were addressed. The site assessments were informed by the specialist views of key organisations (including LCC Highways, Environment Agency etc). Alongside the responses from these consultees, the assessments included an appraisal of constraints, realistic capacities and development potential. Section two of the SHELAA report details the methodology used to address the considerations above:

- GIS mapping was used to calculate the quantum of land that is suitable for development within partially constrained sites. To estimate the development potential (i.e. yield) of sites proposed for housing a density multiplier (i.e. a dwellings per hectare figure) was applied to the developable area of sites (i.e. the 'gross site area' where a site is unconstrained, or the 'net developable site area' where a site is partially constrained). The density multiplier applied depends on a site's location, context and surrounding built form. The Central Lancashire Density Study ([HO05](#)) was the starting point for selecting an appropriate density for each site.
- Housing potential was therefore estimated using the following formula: Density Multiplier x Developable Area\* = Housing Potential (units) (\* the 'net developable site area' where a site is partially constrained, or the 'gross site area' where a site is unconstrained).
- For sites where a mix of housing and economic development uses are proposed (and assessed as being potentially appropriate) a density multiplier was applied to the portion of the developable area put forward for housing.

- If a landowner or site promoter has prepared a masterplan or provided information to the Council regarding their proposed yield, this was used to inform density assumptions (where agreed by the Council). Equally, if planning permission has been previously granted, or a planning application was under consideration, the quantum of development approved/proposed within the planning application was assumed to constitute the development potential of a site.
- The Viability Assessment ([CD13/IT05](#)) included a whole plan viability assessment of the draft policies and proposed strategic site allocations within the emerging CLLP. For the non-strategic residential allocation sites, the appraisals considered the viability of greenfield and brownfield sites in different value zones.

A site promoter survey took place in August 2024, which sought information from those promoting sites being considered for allocation in relation to proposed yields, development timescales and other considerations including feasibility and viability. No major viability issues were raised.

**d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?**

The four SHELAA Call for Sites consultation sought information from respondents on known infrastructure constraints / requirements, and identified additional information through desktop reviews, and through the assessments provided by specialists / stakeholders including Lancashire County Council as the Highways Authority, United Utilities and the Environment Agency.

Additional evidence studies, including Strategic Flood Risk Assessments and highway / transport assessments, have also been used to understand infrastructure needs.

Furthermore, the Council have liaised with the site promoters of the housing allocations to understand their deliverability. This was done through the site promoter survey in August 2024, the housing land monitoring and five year supply work and through further contact with site promoters to seek any update of their responses to the site promoter survey. The Council continue to liaise with all landowners / developers of the residential allocation sites to understand their deliverability. The Council remain committed to working with all relevant parties to address concerns through the planning process, and the policies / KDCs contain relevant requirements to enable this.

A number of the allocations already have planning approvals granted, therefore infrastructure requirements have already been assessed through the planning application process and secured via conditions or a legal agreement.

Based on the findings of the SHELAA and other evidence base studies, the CLAs consider all of the HS4 allocations to be deliverable.

**e) Is there evidence that the development of the allocations is viable and developable during the plan period?**

Yes - the SHELAA ([HO14a](#)) methodology details how sites were assessed as developable.

Only sites that the SHELAA considered 'suitable', 'available' and 'achievable' have been selected as housing allocations in Policy HS4 of the Publication Local Plan. A whole plan viability assessment has been undertaken (Central Lancashire Local Plan Viability Report [CD13/IT05](#)).

*The Viability report (paragraph ES29, page vi) highlights 'that medium and higher-value greenfield sites, both within and outside settlement boundaries, are viable. Higher-value brownfield sites within settlements also show viability, though they become marginal in out of settlement locations. Medium-value brownfield sites are assessed as marginal both within and outside settlements. However, these marginal schemes require only minor shifts in market conditions, such as the stabilisation of construction costs, moderate increases in sales values, or reductions in finance costs to become viable, which is a reasonable expectation over the plan period'.*

*The Viability study (paragraph ES30, page vi) also identifies that 'all typologies within the lower value zones are unviable, along with all typologies assessed within Preston city centre, where high build costs and site constraints present challenges to viability, in which proactive approaches should be made to deliver housing'.*

Aspinall Verdi (authors of the Viability Study) stress that:

- *'Viability is a key consideration when bringing forward residential developments in Preston City Centre. Preston City Council have a strong record in working with Homes England and developers, supporting them in bringing forward developments in the City Centre which in turn helps deliver the Council's ambitions for regeneration of the city centre (paragraph ES35, page vii)*

- *Recent examples of this include developments by developers such as the Heaton Group at The Exchange and Bishopsgate Gardens and the Cringle Corporation at Park Place. Investment in the city is continuing to grow through the public sector; including Preston City Council and Government grant funded regeneration projects; housing associations, with significant investment by Onward Homes in the delivery of full estate regeneration in Stoneygate including affordable housing schemes at Horrocks Mill and the Avenham Towers site, as well as the private sector for housing and commercial uses (paragraph ES36, page vii) .*
- *In relation to Preston City Centre, the Brownfield Infrastructure Land (BIL) funding from Homes England is a competitive programme, and there is potential for three sites to benefit from this funding (paragraph ES37, page viii).*
- *The Affordable Homes Programme (AHP) will also play a role in supporting the delivery of affordable housing, helping to bridge viability gaps in certain locations (paragraph ES37, page viii).*
- *Additionally, the Brownfield Land Release Fund (BLRF) presents an opportunity for Council-owned sites, with a new round expected to be launched soon. Looking ahead, the Spring Spending Review could bring further opportunities to support local authorities and developers in delivering brownfield regeneration, building on previous programmes like BIL. Further opportunities for public funding to enable the delivery of sites allocated in the Local Plan are also being explored. It is recognised that these schemes do need a flexible approach to considering viability, and this is also reflected in the acceptance of zero affordable housing on past site-specific schemes along with a reduced CIL rate in the Inner Preston Zone. As devolution progresses, there is scope for future funding programmes to be developed, providing additional mechanisms to drive regeneration and investment across Preston city centre (paragraph ES37 & 38, page viii).*
- *The viability assessment is not intended to be a pass/fail test for a Local Plan, especially where key national and local imperatives exist to promote regeneration of brownfield land (paragraph ES5, page i).*

In conclusion, within Preston City Council area many sites are identified as viable within the Viability Report. Sites allocated within the city centre, lower value area, are highlighted as having challenges to viability that require pro-active approaches to

delivering housing, with recent successful schemes in the City Centre proving this is achievable.

**f) Are there any omissions in the policy, and is it sufficiently flexible?**

The Council does not consider that there are any omissions in the policy. The sites have been identified through a robust SHELAA process, which has included four Call for Sites consultations and then the assessment of all site suggestions. The assessment of those sites has been transparently documented through the SHELAA evidence.

The CLAs note that at the Regulation 19 consultation stage, a number of representations were received that objected to the omission of specific sites. The SHELAA, and its accompanying appendices, set out the reasons for the exclusion of the sites, and this is not an omission to the policy.

Policy HS4 details the sites allocated and protected for housing development and clearly states they will be considered in line with the KDCs of Appendix 4. The KDCs provide the appropriate guidance and sufficient flexibility to ensure development proposals respond to identified constraints but without being wholly prescriptive.

Through the Regulation 19 consultation, some requests were made by Historic England (D02.16), National Grid (D05.4) and United Utilities (D15.02-03) for the inclusion of specific, detailed requirements within the KDCs. However, these matters are addressed through other policies, including EN13, and through the development management process and therefore changes to the KDCs are not considered necessary.

**5.9 Does the policy provide sufficient information on site specific constraints and requirements such as the physical and social infrastructure that may be required as part of the development?**

Yes – Policy HS4 (2) makes clear that proposals on allocations identified by an asterisk will be considered against the KDCs set out within Appendix 4. The KDCs have been identified through the CLLP’s evidence (including the SHLAA (HO14)) and set out expectations for development, including that relating to physical and social infrastructure. Each of the KDCs reference the related policies of the plan.

In identifying site specific constraints and physical and social infrastructure requirements, the Council have engaged with infrastructure and service providers to

identify both constraints and needs, and these are reflected within the plan and detailed in the supporting evidence.

Irrespective of whether a residential allocation site is accompanied by KDCs, the plan should be read as a whole and other planning policies address specific physical and social infrastructure – including Policy HS5 and HC5 (Open Space, Sport, Recreation and Playing Pitch Requirements), HC3 (Community, Health and Education Facilities), EN5 (Green Infrastructure) and EN10 (Development and Flood Risk).

Additionally, Policy ID1 guides infrastructure planning principles and Policy ID2 sets expectations in relation to developer contributions and planning obligations. This provides the wider framework for the consideration of proposed developments on residential allocations.

The CLAs are committed to continuing to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. This includes that which shall be secured through planning obligations through a planning application. Those requirements will be identified in consultation with infrastructure bodies – e.g. highways, utilities, education and health - through the planning application process, and ensures that proposals can respond to the most-up-to date needs.

The Central Lancashire Infrastructure Delivery Plan ([ID08](#)) and Schedule ([ID09](#)) will also be used to identify physical and social infrastructure requirements.

Please note, the 16 site allocations listed below have been granted planning permission. Any site-specific constraints have been mitigated through the development management process, and any required social/physical infrastructure has been sought by way of S106 legal agreement and/or S278 highway agreement.

Ref	Location	Notes
HS4.1	Former Whittingham Hospital	Outline permission approved 10/09/2020 (06/2019/0365). A reserved matters application (06/2025/0008) is currently pending for remaining phases.
HS4.2	Land off Riversway & West of Dodney Drive Lea #	Reserved matters permission 06/2022/1777 approved 11/07/2023. Site is under construction.

Ref	Location	Notes
HS4.4	Cardwell Farm, Garstang Road #	Hybrid permission 06/2022/0644 approved 24/01/2023. Reserved Matters (06/2025/0315) approved 12/08/25. Site is under construction
HS4.6	Former Horrocks Mill, Queen Street	Outline permission 06/2023/0818 approved March 2024.
HS4.7	The Larches, Larches Lane	Full permission 06/2024/0750 for net gain 20 units - approved July 2025
HS4.10	Moor Park Depot, Moor Park Avenue	Full permission 06/2024/0889 for 51 units approved May 2025.
HS4.12	Land at Cottam Hall	Reserved matters permission 06/2021/1022 approved 07/11/2021. Site is under construction
HS4.17	Land North of Tom Benson Way	Full permission 06/2020/0652 approved 15/12/2022.
HS4.18	Former St Joseph's Orphanage, Theatre Street	Full permission 06/2019/0952 approved 03/02/2021
HS4.19	Avenham Street Car Park	Full permission 06/2019/0856 approved 06/11/2020
HS4.20	Grimshaw Street/ Queen Street	Outline permission 06/2022/1084 granted June 24 for 469 units.
HS4.21	Former Byron Hotel, Grimshaw Street	Full permission 06/2018/1276 approved 02/07/2019
HS4.22	Mount Street/ Garden Street	Full permission 06/2019/0499 approved 14/07/2020
HS4.24	The Sumners, 195 Watling Street Road	Reserved matters 06/2023/0531 approved 15/08/2023. 06/2025/0521 Discharge of Conditions application- pending consideration
HS4.29	Corner of Manchester Road & Church Street	06/2023/1316 full application pending S106
HS4.30	Tulketh Crescent	Full permission 06/2023/0191 approved 21/09/2023