

# EiP Hearing Statement

## Central Lancashire Local Plan

### Bloor Homes

### Representor ID A65

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

### Subject Matter 5 – Housing Allocations

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#### 1.0 Introduction

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

#### 2.0 Questions

*Q5.1: Do the sites allocated for residential development provide an appropriate range of sites in terms of their type and size?*

- 2.1 No. The CLLP identifies four key strategic sites for residential development. No strategic sites are proposed in Chorley to meet future development needs despite the high LHN and affordable housing need in Chorley. Policy HS2 sets out the 37 housing allocations for Chorley. Thirteen of the allocations are for 20 or fewer dwellings including one allocation

for just two dwellings. The total number of housing allocations, including mixed use allocations, is 3,443 homes which is only 57% of the disputed housing requirement for Chorley.

- 2.2 Bloor recognises the role of small and medium sites in making an important contribution to meeting the housing requirement, and the requirement for authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare (paragraph 70a, 2023 NPPF). Bloor does however have concerns over the developability of several of the larger allocations and the large reliance on unidentified windfall sites. Given the approach the Council has taken to identifying allocations of all sizes (as little as 2-unit capacity), it is questionable where all the windfall sites are going to be derived from.
- 2.3 Bloor is strongly of the opinion that in order to meet local housing need, additional land must be allocated for major residential development. Indeed, the 2023 NPPF recognises that the “*supply of large numbers of new homes can often be best achieved through planning for larger scale development*” [§74].
- 2.4 Policy HS2 claims that the allocations in Chorley represent sufficient land for 3,443 dwellings, (equivalent to 14.6% of Central Lancashire’s claimed housing requirement of 23,652 units) to be delivered in the Local Plan period between 2023 and 2041. As set out in Bloor’s Matter 2 and 3 Papers, this will lead to housing need in Chorley not being met.
- 2.5 Notwithstanding this, Bloor has concerns over the developability of at least six of the proposed allocations in Chorley. This should be viewed in the context of insufficient evidence that windfall sites provide a reliable source of housing delivery<sup>1</sup>.
- 2.6 In light of Bloor’s concerns over the developability of several allocations, an overreliance on windfall sites and a disproportionately low level of housing growth being directed towards Chorley, additional sites must be allocated for residential development in Chorley to ensure housing need is met. As set out at paragraph 74 of the 2023 NPPF, this is often best achieved through planning for larger scale of development.
- 2.7 The Spatial Strategy is overly reliant on windfall sites within existing settlements to deliver housing growth. Whilst Bloor recognises the benefits associated with this approach, the viability constraints can often prevent policy compliant levels of affordable housing from coming forward on brownfield sites. To address this, the CLLP should allocate more greenfield land in sustainable locations on the edge of settlements, where policy compliant levels of affordable housing can be delivered. This is particularly pertinent for Chorley as the release of Green Belt land for residential purposes will result in the delivery of affordable housing in accordance with the Golden Rules.
- 2.8 Land at Springfield Road, Coppull is developable and available for major residential development. It should be allocated to ensure that the CLLP provides an appropriate range of sites in terms of type and size, to meet market and affordable housing need in Chorley.

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<sup>1</sup> As set out in greater detail in Bloor’s Regulation 19 Representations and Matters 2 and 6 Papers.

*Q5.2: Is each site allocated for residential development sound? In particular:*

2.9 No. There is a concerning absence of robust evidence to demonstrate the developability of some of the allocations in Chorley. Their failed delivery will undermine housing delivery in Chorley and Central Lancashire more widely. Our analysis has demonstrated that there are at least six allocated sites that do not meet the definition of developable. The CLLP fails to identify a sufficient supply of developable sites to meet housing needs in Chorley, as required by paragraphs 11 and 69 of the NPPF.

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

2.10 No. Bloor has considerable concerns in relation to the developability of six of the allocations, as set out in greater detail below. This equates to 668 units of the supply from allocated sites in Chorley alone. We have not undertaken an in-depth analysis of the sites allocated for residential development with a capacity below 40 units. This analysis could result in further units needing to be removed from the CLLP's claimed supply of developable sites.

**HS2.5 – Babylon Lane, Adlington**

2.11 An application for outline planning permission for 40 dwellings on the site (ref. 23/00510/OUTMAJ) was dismissed at appeal on 10 May 2024 (ref. 3329702) following non-determination of the application. In dismissing the appeal, the Inspector concluded that the scheme would result in inappropriate development in a flood risk area [§51] and that development on the site will exacerbate existing flooding in the area [§17-18]. Areas within the site, including along the line of the culvert, and Babylon Lane are at high risk of surface water flooding.

2.12 The dismissed appeal clearly sets out the Inspector's view that the site is not a suitable location for housing development, owing to its risk of flooding. The site therefore does not meet the definition of developable as set out in the NPPF and should be removed as an allocation from the CLLP. A separate application for 40 dwellings is pending determination (ref. 21/00270/FULMAJ), although this was submitted over four years ago and has been subject to 267 public objections, and has not progressed.

**HS2.10 - Little Knowley Farm**

2.13 An application for outline planning permission (ref. 22/00538/OUTMAJ) for the erection of up to 200 dwellings on the site was withdrawn by the applicant (Castle Green Homes) on 14 February 2024.

2.14 On land adjacent to the site, an application for outline planning permission (21/00253/OUTMAJ) for the erection of up to 130 dwellings was dismissed at appeal on 1 December 2023 (ref. 3314846). The Inspector found that large-scale housing development at the site would be greatly at odds with the prevailing more pastoral and natural surrounds of this part of the countryside [§10] and result in considerable harm to the character and appearance of the area [§21]. We can only conclude that the original application on this site

was withdrawn for fear of receiving a similar reason for refusal on this site. The draft allocation, as an adjacent site, is subject to similar landscape constraints.

- 2.15 Subsequently, an application for 146 dwellings was submitted on the site in July 2025 (ref. 25/00634/FULMAJ) and is pending determination. There have been 90 public letters of objection to this application. The onus is on the Council to demonstrate that the site is developable. In the absence of clear evidence to suggest that the site will come forward and in light of the withdrawn application, we must conclude that it is not an appropriate residential allocation.

### **HS2.11 – Great Knowley**

- 2.16 Appendix 4 of the CLLP (Housing Allocations – Key Development Considerations) provides additional information on this allocation. The draft allocation is bound by the Leeds and Liverpool Canal to the west and beyond this the Grade II Listed Botany Bay Mill. The site slopes significantly from east to west towards the canal, leading to prominent views of Botany Bay from Blackburn Brow in the east.
- 2.17 Appendix 4 states that a Heritage Impact Assessment has been prepared which identifies that development on the site would have a “*significant impact on the setting*” of the Grade II Listed Botany Bay Mill and non-designated Knowley Farm.
- 2.18 The NPPF requires harm to heritage assets to be weighed against public benefits arising from a proposal (§207-208). The Historic Environment PPG is clear that public benefits could be anything that delivers economic, social or environmental objectives described in the NPPF, including the delivery of homes. The draft allocation would therefore give rise to public benefits that any future decision maker would need to weigh against the “*significant impact on the setting*” of nearby heritage assets.
- 2.19 This housing delivery could however be delivered on any other allocated site, or across multiple other allocated sites, which would not give rise to a significant impact on heritage assets and are therefore preferential. On that basis, the site is not considered to be a suitable allocation for residential development in accordance with the requirements of the NPPF.
- 2.20 All 246 units in the CLLP’s supply should therefore be removed and reallocated to preferential sites which would not have a significant impact on the setting of a nearby heritage asset.

### **HS2.34 - West of M61, Land North of Hill Top Farm & HS2.37 – Hill Top Farm**

- 2.21 At Hill Top Farm (HS2.37), an application for outline planning permission (ref. 23/00727/OUT) was submitted on 31 August 2023 and is currently pending determination. Despite the passage of time, it is not clear why the application has not been determined but we can only assume that there are technical issues with the site or the application.
- 2.22 Lancashire County Council’s Highways Officers have objected to the live application on the site, stating that the proposals would have a detrimental impact on highway safety in the immediate vicinity of the site and should be refused on highway safety and sustainability

issues (LCC Highways Response dated 3 November 2023). LCC Highways' Response dated 21 June 2024 confirms that none of the concerns raised in its previous response had been addressed by revised information. The live application is subject to objections from over 40 residents and Councillors on highways grounds.

- 2.23 We understand that both allocations would be accessed from Hill Top Lane, a single-lane country road. There are no existing pedestrian footways within the proximity of the sites on Hill Top Lane. As a result, there are significant concerns associated with access arrangements to these two sites, which have led us to conclude that they are not in a suitable location for residential development. Highways constraints associated with the sites are exacerbated when the two allocations are considered together.
- 2.24 Access constraints have not been adequately considered as part of the allocation of these two sites for residential development. As a result of these constraints, we consider that the two allocations do not meet the definition of developable.

### **HS2.36 - West of M61, Land adjacent to Delph Way**

- 2.25 The draft allocation slopes significantly down towards the River Lowstock on the south-eastern boundary. The River Lowstock and its banks are within Flood Zones 2 and 3. To the north, the site is bound by a Public Right of Way, woodland and a landfill.
- 2.26 The CLLP states that suitable vehicular access 'should be achievable' from Delph Way/Cross Keys Drive. These roads are single lane estate roads which lead to a series of shared private driveways. These roads do not appear to be suitable access points for an additional 130 dwellings and associated movements. It appears that there are no alternative access options to the site. Considering poor access arrangements, the site does not appear appropriate for this level of residential development.
- 2.27 As set out in Bloor's Regulation 19 Representations and Appendix 4 of the CLLP, there are several other constraints associated with this draft allocation, including challenging topography, risk of contamination, unsuitable access arrangements and the potential for landscape harm. For a myriad of reasons, this draft allocation is significantly constrained. The site is therefore not considered to be in a suitable location for development and as such does not meet the definition of developable as set out in the NPPF.

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

- 2.28 Several of the sites allocated for residential development in Chorley benefit from planning permission. For these sites indicative yields appear to be based on planning permissions and live applications.
- 2.29 The SHLAA sets out that yield for housing sites is based on multiplying a density multiplier by developable area (the 'net developable site area' where a site is partially constrained, or the 'gross site area' where a site is unconstrained). The Central Lancashire Density Study (October 2022) was considered as the starting point for selecting an appropriate density for each site. It is of note that this study is now over three years old and was published prior to the introduction of the statutory requirement to deliver a minimum 10% biodiversity net

gain and new SUDs guidance. It is unlikely that the CLLP has adequately taken into consideration the implications of delivering a 10% net gain in biodiversity and the latest SUDs guidance as part of yield calculations. Furthermore, Bloor considers that the Councils have provided insufficient evidence to demonstrate that sites are altogether ‘unconstrained’. This approach has artificially inflated housing supply.

2.30 The Central Lancashire Density Study average density figures from Chorley are derived from four rural settlement sites (with planning permissions ranging from 2010 to 2013), ten suburban sites, and nine inner urban and town centre sites. Deriving average densities for future allocations based on this limited and dated number of schemes is reductive. Yields and development mix for each allocation should be the result of evidenced work undertaken on each site.

2.31 The Main Viability Report (2025) highlights the “*unviable nature across brownfield sites*” largely being down to higher Benchmark Land Values per acre. All typologies within lower value zones are unviable. Given these findings, the CLLP provides insufficient evidence to demonstrate that viability has been adequately considered, particularly on brownfield sites and sites in lower value zones, including Chorley.

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

2.32 No. The Councils have not provided sufficient evidence within the CLLP, or the evidence underpinning it, to demonstrate that due consideration has been given to infrastructure requirements, and how these requirements will be delivered to facilitate allocations. As set out above, we have concerns over the accessibility of some of the allocations, and lack of acknowledgement as to what infrastructure is required to bring these allocations forward, and evidence that the required infrastructure is deliverable.

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

2.33 The Central Lancashire Strategic Housing and Economic Land Availability Assessment identifies that a significant proportion of housing delivery in Central Lancashire will be front-loaded in the first 10-years from adoption of the plan. This is largely the result of the CLLP taking a reactive approach to allocating land for residential development on the basis of existing planning permissions or live applications, rather than positively considering sites.

2.34 Of the 21 housing allocations with a capacity of 40 or more units, 11 already benefit from an extant planning permission or a resolution to grant permission, equating to 1,198 units (or 48% of the claimed 2,500 units supplied by these allocations). After the six disputed sites above have been removed, this figure rises to 65% of the claimed supply. Indeed, the Central Lancashire Housing Trajectory identifies that units will be delivered on some of these allocated sites prior to the Plan being adopted.

- 2.35 This will result in a significant reduction of supply in the last five years of the plan period. For Chorley, delivery from sites identified in the SHELAA is expected to fall to just 118 units (23.6dpa) in the five-year period to 2041.
- 2.36 Additionally, the CLLP and the evidence base that underpins it, fails to provide any evidence that allocations not benefitting from planning permissions or live applications meet the definition of developable.
- 2.37 Housing delivery from sites identified in the SHELAA will be concerningly low in Chorley in the later years of the plan period. Coupled with the absence of evidence to suggest that allocations identified as delivering units in the later years of the plan period are developable, this could lead to inadequate housing delivery throughout the plan period.

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

- 2.38 Yes, there are omissions.
- 2.39 Bloor is of the opinion that significant changes are required to Policy HS2 for it to meet the test of soundness. The CLLP needs to identify a significant number of additional developable sites to address this shortfall. Land at Springfield Road, Coppull meets the definition of developable and is available. The site should be allocated for residential development, to ensure that housing delivery in Chorley is not undermined.

*Q5.3: 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?*

- 2.40 No. As set out in detail above, the CLLP fails to adequately recognise several key site-specific constraints that indicate some of its allocations are not developable. Of the 44 allocations in Chorley, additional information is only provided at Appendix 4 of the plan for five allocations. This should be repeated for all allocations. Appendix 4 identifies constraints associated with HS2.11 & HS2.36 but allocates these sites for residential development in advance of technical work being completed to confirm whether they are developable. This approach is not effective or justified.

**Word Count: 2,829**