

# PLANNING STATEMENT

INCLUDING

STATEMENT OF COMMUNITY INVOLVEMENT | S106 DRAFT HEADS OF TERMS

LEA HOUGH AND CO LLP

LAND AT BLAINSCOUGH HALL, COPPULL

2018-087

DECEMBER 2020

## Signing off Sheet

**Client:** Lea Hough and Co LLP  
**Project:** Land at Blainscough Hall, Coppull  
**Document:** Planning Statement  
**Date:** December 2020  
**Ref:** 2018-087

Stage	Prepared By	Checked By	Date	Signed
Draft	EB	MS	20.12.2020	

**Final**

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Appendix 1 – Public Consultation Leaflet

## 1.0 Purpose of the Document

1.1 This statement has been prepared by NJL Consulting for Lea Hough in support of an outline planning application for up to 123 no. dwellings at Land at Blainscough Hall, Coppull.

1.2 The description of development is as follows:

*'Outline planning application for the erection of up to 123 dwellings with public open space provision, structural planting and landscaping, and vehicular access points from Grange Drive. All matters reserved save for access.'*

1.3 This Planning Statement accompanies a suite of documentation in support of this outline planning application. It includes the following components which are validation requirements:

- Statement of Community Involvement; and
- S106 Draft Heads of Terms

1.4 Overall, this statement explains the proposed development within the local policy context and its consistency with national planning policy. The case for development is underpinned by a detailed rationale as to why the proposals represent appropriate development in the right location and are being brought forward at the right time. The underlying need for the development, particularly in the context of a national and local housing crisis, is also explained within this Statement.

1.5 The Planning Statement provides a technical assessment of the suite of supporting documents to conclude that there are no significant and demonstrable adverse impacts that would outweigh the benefits of granting permission when assessed against the NPPF as a whole. Furthermore, the proposals constitute sustainable development in the context of the three dimensions of sustainable development; environmental, social and economic, and should therefore be approved.

1.6 A suite of updated technical reports also accompanies this planning application and are as follows:

- Design and Access Statement prepared by Baldwin Design Architects
- E.I.A. Screening Opinion prepared by NJL Consulting

- Energy Strategy Statement prepared by Briary Energy
- Transport Assessment and Framework Travel Plan prepared by Eddisons
- Phase 1 Geo-environmental Desk Study Report prepared by REFA
- Flood Risk Assessment prepared by Lees Roxborough
- Noise Impact Assessment prepared by Clement Acoustics
- Preliminary Ecological Appraisal prepared by Pennine Ecological
- Preliminary Arboricultural Impact Assessment prepared by Christians Environmental
- Crime Impact Statement prepared by Lancashire Constabulary
- Mineral Resource Assessment prepared by Wardell Armstrong
- Air Quality Assessment prepared by Ensaf Consultants

1.7 A full suite of plans and drawings in support of the application have also been submitted as follows:

- Site Location Plan (Ref: LH.BH.LP.01)
- Illustrative Masterplan (Ref: LH.BH.IMP.01)
- Parameters Plan (Ref: LH.BH.PP.02)

1.8 The planning application comprises of all requisite information reflecting the local and national validation requirements as those necessary to ensure the application's validation and determination.

## **2.0 The Site Context**

### **The Application Site**

- 2.1 The site comprises two irregularly shaped parcels of greenfield land and additional land around Blainscough Hall, located to the south west of Coppull and falling within the Chisnall ward area (see Illustrative Masterplan). The site measures 5.51ha in area with the main element of the site currently used for agricultural purposes while the land around Blainscough Hall is currently part of a domestic garden serving the property but in the ownership of the applicant of this planning application.
- 2.2 The site is general flat in topography (falling slight west to east) and bordered by Blainscough Lane and an industrial employment site to the southern boundary. The site benefits from mature tree cover and woodland which screens the site along the western, southern and eastern boundaries which broadly follow the brook corridor. Beyond this woodland to the south is Blainscough Hall and adjacent industrial/commercial premises. Adjacent to the east is a Local Nature Reserve.
- 2.3 Further to the east and beyond is the Springfield Leisure Centre and village centre of Coppull where local amenities, services and facilities can be found along Spendmore Lane. The former Lancashire Union Railway line dissects the settlement and is also located to the east of the site. The nearest train station to the development site is Euxton Balshaw Lane, located 3.8 miles (6 km) to the north.
- 2.4 Further beyond to the south is predominantly agricultural fields which extend towards the next most adjacent settlement of Standish. Ribbon development comprising of dwellings, school and medical facilities extends along the A49 to the west of the site, with agricultural fields extending to the boundary of the M6.
- 2.5 Considering the pattern of development within Coppull and the profile of the settlement, the site represents a logical extension within a highly sustainable location of the Borough.

### **Designations**

- 2.6 The site is not within a Conservation Area nor are there any immediately adjacent locally or statutory listed buildings. The site is in Flood Zone 1 and not considered to be at risk of flooding. Significant tree cover helps to visually screen the southern and eastern boundaries of the site. Along the eastern boundary but beyond the red line boundary there are a grouping of trees, protected under Tree Preservation Orders (Ref:

Chorley BC TPO 3 (Coppull) 1984) predominantly located within the Local Nature Reserve.

## **Planning History**

- 2.7 The main site area has not been subject to any planning applications previously and therefore has no development history. Land associated with the garden to Blainscough Hall falls within the application boundary for an approved change of use application (Ref: 89/00254/COU) to convert the dwelling into a nursing home.
- 2.8 Full planning permission (Ref: 00/00264/FUL) was granted in April 2000 for the development of 106 dwellings which now comprises the residential estate located to the immediate north of the application site along Spendmore Lane.

## **Planning Context**

### **Site Allocation**

- 2.9 The site itself comprises of Safeguarded Land (Blainscough Hall – BNE3.6) designated under Policy BNE3 of the Chorley Local Plan which states that *'planning permission for the permanent development of safeguarded land will only be granted following a Local Plan Review'*.
- 2.10 The NPPF (2019) provides the following guidance regarding Safeguarded Land under paragraph 139 (d), stating plans should: *'make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development'*.

### **Emerging Central Lancashire Local Plan 2021 - 2036**

- 2.11 Detailed representations have since been submitted in support of the site coming forward for residential development, through the plan making process for the Central Lancashire Local Plan (CLLP). This included the initial 'Call for Sites' exercise held in 2018 during which sites were considered for future development in the emerging Local Plan, including a review of those designated as safeguarded land.
- 2.12 These representations provided a detailed site analysis confirming the suitability, deliverability and achievability of the site for delivering major residential development. In February 2020 further representations were made in support of the Central Lancashire Local Plan: Issues & Options Consultation.

- 2.13 Under the emerging plan, the three Central Lancashire Local Authorities explicitly identify the site at Blainscough Hall as a suitable allocation for housing development.

### Suitable and Sustainable Location

- 2.14 Chorley Council have identified a settlement hierarchy within the adopted Local Plan (2015); this is drawn out from the Central Lancashire Core Strategy (2012). This settlement hierarchy is used as the basis for allocating new development within Chorley, with Coppull identified as an 'Urban Local Service Centre'; as such it is considered a sustainable location for new homes.
- 2.15 In terms of connectivity, the settlement of Coppull benefits from its close location to existing highway links including Spendmore Lane which leads directly to Chorley and the M6, allowing for access to Preston, Wigan, Blackburn and the wider motorway network.
- 2.16 The settlement itself includes access to key amenities, medical, education and leisure services which are summarised below:

Local Amenity		Distance	Manual for Streets Guidance Criteria	Compliance
Transport	Bus Stops on A49 Preston Road	350m	1,950m	Yes
	Bus Stops on Spendmore Lane	400m	1,950m	Yes
Shops/ Food Establishments	Singleton's Fish and Chips	400m	1,950m	Yes
	Nellie & Marl's Neighbourhood Kitchen	450m	1,950m	Yes
	Coppull Off Licence	450m	1,950m	Yes
	Co-op Convenience Store	750m	1,950m	Yes
	The Springfield PH	680m	1,950m	Yes
Education	Coppull Library	640m	1,950m	Yes
	St Oswald's Catholic Primary School	320m	3,200m	Yes
	Coppull Primary and Nursery School	700m	3,200m	Yes
Medical	Lloyd's Pharmacy	750m	1,950m	Yes
	Coppull Medical Centre	600m	1,950m	Yes
Leisure	Coppull Leisure Centre	600m	1,950m	Yes

Table 1: Distance from Local Amenities and Facilities

- 2.17 The table also identifies the distance from the application site to the identified amenities and facilities.
- 2.18 Existing pedestrian footways of around 2 metres in width are located to the north of the site on Grange Drive which run directly towards the centre of Coppull. These routes



connect to the existing footway network in Coppull to ensure a direct and safe connection to the day to day amenities for pedestrians.

- 2.19 Two Public Rights of Way (PRoW reference: 9-10-FP 34 and 35) routes pass through the site boundary – both are accessible from the site. The two routes improve accessibility to the surrounding areas; linking the site directly to Mountain Road to the east, Blainscough Lane to the south and Grange Drive to the north. The PRoW further increase accessibility to the surrounding amenities.
- 2.20 Guidance contained in Manual for Streets states 2km is considered a preferred maximum walking distance to services and facilities. Areas within 2km of walking distance are considered accessible by foot from the site. As detailed in Table 1, the site is sustainably located to allow future residents to access a range of services, amenities, and facilities.
- 2.21 The most accessible train stations to the site are either Chorley or Wigan North Western. These are both accessible via bus service 362, with a journey time of around 17 and 23 minutes respectively. From Chorley station, Manchester City Centre is approximately a 37-minute train journey (around 3 trains per peak hour) and Preston is approximately a 15-minute train journey (around 2 trains per peak hour).
- 2.22 There are 2 bus stops located within 300m of the site. The nearest bus stops are located to the west of the site on the A49 Preston Road (Oak Tree Bus Stop – approximately 250m from the site) and on Spendmore Lane (Tanseley Avenue Bus Stop – approximately 260m from the site). Both bus stops along each of these corridors are within a 5-minute walk of the centre of the site and benefit from frequent services to key destinations across the Borough including Chorley town centre and further beyond to Wigan town centre.

## 3.0 The Housing Delivery Challenge

- 3.1 This section sets out the context to the national priority of significantly boosting housing supply, the current housing market within Chorley Borough Council and the observed effects on affordability in the Borough.

### The National Picture

#### ***Housing White Paper: Fixing our Broken Housing Market***

- 3.2 The Government published a Housing White Paper in February 2017 to set its agenda for 'fixing our broken housing market'.

- 3.3 Prime Minister Theresa May's Foreword states:

*'Our broken housing market is one of the greatest barriers to progress in Britain today...I want to fix this broken market so that housing is more affordable and people have the security they need to plan for the future...'*

*The starting point is to build more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down....*

*We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system...*

*First, we need more land for homes where people want to live...*

*Second, we need to ensure that homes are built quickly once planning permissions are granted...*

*Third, we will diversify the housing market, opening it up to smaller builders and those who embrace innovative and efficient methods...and we will work to attract new investors into the residential market including homes for rent.*

*By building the homes Britain needs and giving those renting a fairer deal, we will give those growing up in society today more chance of enjoying the same opportunities as their parents and grandparents. It will ensure that the housing market is as fair for those who don't own their own homes as it is for those that do'*

3.4 The Housing White Paper explains how since the 1970's 160,000 new homes have been built each year which contrasts with a need for 225-275,000 to keep up with population growth and tackle the years of undersupply. The Government has identified three key issues with the housing system that it intends to tackle<sup>1</sup>:

1. Local planning authorities are not planning for the homes they need<sup>2</sup>, as illustrated by the fact that over 40% of local planning authorities don't have a plan that meets projected household growth needs in their area<sup>3</sup>.

The Government's headline solution is to bring forward a centrally set objectively assessed need figure for each local authority area<sup>4</sup>.

2. The housebuilding industry is too slow at delivering housing<sup>5</sup>. This is highlighted by data which states that more planning permissions are being granted but there remains a gap between planning permissions being obtained and new homes being built<sup>6</sup>.

The Government's solution is to give local planning authorities greater powers to require developers to bring forward sites quickly<sup>7</sup>.

3. The construction industry is reliant on too small a number of big companies to deliver housing, which has the effect of low productivity<sup>8</sup>.

The Government's solution is to diversify the housing market by opening it up to small developers and embracing '*innovative and efficient methods*'<sup>9</sup>.

3.5 The White Paper sets a clear agenda to shake up the housing system, to increase the delivery of new homes to keep pace with housing needs across the Country.

### ***Planning White Paper: Planning for the Future***

3.6 On the 6<sup>th</sup> August 2020, the Government published a Planning White Paper setting out radical reforms to the planning system, with the aim of creating a '*significantly simpler, faster and more predictable system*'<sup>10</sup>.

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<sup>1</sup> Housing White Paper (2017) Page 9

<sup>2</sup> Housing White Paper (2017) Page 9

<sup>3</sup> Housing White Paper (2017) Page 13

<sup>4</sup> Housing White Paper (2017) Page 14

<sup>5</sup> Housing White Paper (2017) Page 9

<sup>6</sup> Housing White Paper (2017) Page 13

<sup>7</sup> Housing White Paper (2017) Page 14

<sup>8</sup> Housing White Paper (2017) Page 9

<sup>9</sup> Housing White Paper (2017) Page 14

<sup>10</sup> Planning White Paper (2020) Page 14

- 3.7 The reforms are brought forward in the context of the Government's aspiration of building 300,000 homes per year - a target which has yet to be delivered as highlighted by the fact that just 241,000 new homes were built in 2019. The White Paper acknowledges that *'The result of long-term and persisting undersupply is that housing is becoming increasingly expensive'*<sup>11</sup>. Through overhauling the planning system there is an opportunity to better streamline the planning process, accelerate the delivery of new homes and address the issue on affordability.
- 3.8 The White Paper makes clear however that *'we (Government) are cutting red tape, but not standards'*<sup>12</sup>, highlighting that as important as it is to boost housing, it is equally vital that good design and high quality of development in the right place is secured. This premise reflects the interim report<sup>13</sup> prepared by the Building Better, Building Beautiful Commission which strongly advocates that the housing industry achieves beautiful design and good place-making.
- 3.9 Alongside the White Paper, Central Government also consulted on a new Standard Housing Methodology envisaged as *'a new nationally determined, binding housing requirement that local planning authorities would have to deliver through their Local Plans'*<sup>14</sup>. The White Paper continues that *'This would be focused on areas where affordability pressure is highest to stop land supply being a barrier to enough homes being built'*<sup>15</sup>.
- 3.10 The proposed amendments to the formula highlight the extent to which Government has grappled with this policy issue, having initially consulted on the Standard Housing Method in 2017 before introducing it under 2018 NPPF.
- 3.11 The introduction of the standard methodology under the 2018 NPPF was brought forward in order to assess Local Housing Need, as part of a simpler, quicker, and more transparent approach than the former Objectively Assessed Need (OAN). The aim being to shift time and resources from the 'amount' of housing required and instead towards 'where' and 'how' new homes would be built.
- 3.12 The proposed amendments to the standard method under the White Paper were published as a direct response to its failure in delivering the required number of homes against the Government's annual target. This is particularly relevant to authorities where constraints such as tightly defined Green Belt boundaries has led to worsening

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<sup>11</sup> Planning White Paper (2020) Page 14

<sup>12</sup> Planning White Paper (2020) Page 14

<sup>13</sup> Living with beauty: report of the Building Better, Building Beautiful Commission (2020)

<sup>14</sup> Planning White Paper (2020) Page 23

<sup>15</sup> Planning White Paper (2020) Page 23

affordability and a failure to deliver on the proposed 'levelling up' agenda between the north and south of England.

- 3.13 The proposed formula changes to the Standard Method sought to include the higher figure of household projections or 0.5% of housing stock growth within local authorities, and account for areas of worsening affordability levels over the past 10 years. Removing the cap previously in place to ensure numbers were 'deliverable', also represented a clear shift from Government to deliver on their strategic objective of quickly boosting housing supply.
- 3.14 On 16<sup>th</sup> December 2020, the Government moved to resolve the outcome of consultation on both the Planning White Paper and Standard Housing Methodology, by redistributing housing requirements and focusing an additional 35% uplift within the 20 largest cities and urban centres. For the local authorities outside of these areas, the method remains unchanged.
- 3.15 Indeed, the approach has been questioned for not properly levelling up the north-south divide, providing a deliverable solution to achieve a target of 300,000 homes per year, and equally providing the right type of homes in order to meet local needs. Instead, the focus on directing high density development to urban/ city centre locations risks emphasising the delivery on apartments as opposed to family housing.
- 3.16 Notwithstanding the statistics which can often predominate debates around the housing crisis, the realities of increasing unaffordability are far more pressing. This has been highlighted by the recent study undertaken by the Affordable Housing Commission. The study identified that for the many who are unable to access the housing market or are found paying disproportionate outgoings on monthly rents, the following impacts on wellbeing and life prospects with<sup>16</sup>:
- Nearly a third (31%) of UK parents with adult children living at home, not expecting them to move out, and if so, then not for at least 10 years. Nationally, this could be affecting 2.4million people.
  - 13% of UK adults polled (under the age of 45 in a couple) and potentially 1.8million people nationwide have decided to delay having children due to their housing situation and ability to afford to live.

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<sup>16</sup> Affordable Housing Commission (2020) Making Housing Affordable Again: Rebalancing the Nation's Housing System (P.55)

- 13% of the survey recognised that housing stress is a major worry for people and a strain on their mental health. This rises to 25% for those living in unaffordable accommodation.

3.17 Studies such as this come as a timely reminder in highlighting the importance of the planning system and reform to ensure that the significant benefits of delivering new, affordable, quality homes are fully realised.

### **National Planning Policy Framework**

3.18 A revised National Planning Policy Framework (NPPF) was published in February 2019, which reflects the aspirations set out in the White Paper. Housing is at the forefront of the NPPF, as paragraph 59 states *'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay'*.

3.19 To accelerate delivery the revised NPPF includes a number of new measures:

1. It promotes the use of small and medium sized sites for new homes that can be built out quickly. When producing planning policies local planning authorities should propose at least 10% of new homes on such sites, alongside supporting windfall sites in existing settlements<sup>17</sup>.
2. A Housing Delivery Test (HDT) has been introduced which requires local planning authorities to monitor rates of housing delivery and where it falls below 95% of the housing requirement over the previous 3 years an action plan must be implemented<sup>18</sup>. The first HDT findings will be published by Government in November 2018.
3. Local planning authorities have the ability to impose planning conditions requiring commencement on site in less than 3 years<sup>19</sup>.
4. The NPPF also retains the strong emphasis for local planning authorities to be able to demonstrate a 5 year supply of housing land, to which further weight has been

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<sup>17</sup> National Planning Policy Framework (2019) Para. 68

<sup>18</sup> National Planning Policy Framework (2019) Para. 75

<sup>19</sup> National Planning Policy Framework (2019) Para. 76

added through the HDT and the revised requirements for a buffer to be included. There are three options for the percentage buffer:

- A 5% buffer is required *'to ensure choice and competition in the market for land'*, which was included in the previous NPPF;
  - A 10% buffer is required where *'the local planning wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year'*.
  - A 20% buffer is still required where there has been *'significant under delivery of housing'* and to *'improve the prospect of achieving the planned supply'*, but the assessment of under supply is now tied to the previous 3 years, to link to the HDT.
5. A requirement to make efficient use of brownfield land<sup>20</sup>, requiring 'substantial' weight to be attributed to the development of underutilised brownfield land and for local planning authorities to refuse applications that do not make efficient use of land<sup>21</sup>.

3.20 The NPPF 2019 is the Government's way of imposing practical measures on the planning system to realise the objectives of the Housing White Paper. There is an increased focus on ensuring the delivery of housing to meet needs and measures that contribute towards that objective are encouraged.

## The Local Picture

3.21 The issue on delivery rates of open market and affordable housing is considered in more detail below and Section 7.0 of this statement, however it is important to note that the result of the national housing crisis is worsening levels of affordability which prevents so many from accessing the property ladder.

3.22 This is best exemplified by comparing typical loan arrangements with mortgage providers, who typically offer loan to income ratios from 3.25 annual salary up to a cap at around 4.5 times annual salary. Alongside this a minimum deposit of 5% is required with a maximum loan to value (LTV) ratio of 95%.

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<sup>20</sup> National Planning Policy Framework (2019) Para. 117

<sup>21</sup> National Planning Policy Framework (2019) Para. 123

- 3.23 As set out below<sup>22</sup>, property prices within the Borough of Chorley have risen over the past decade against annual salary incomes to such an extent that mortgage lenders would be unable to commit funds to support people onto the housing market.

Year	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Earnings Ratio	5.56	5.91	6.24	5.70	5.96	5.88	5.85	5.92	6.45	5.37	5.70

Table 2: Lower quartile house price to lower quartile earnings ratios

- 3.24 For context on the scale of this increase, data on the earnings ratio back in 2002 highlight this at just 3.35<sup>23</sup>. Subsequently this figure has nearly doubled in 2017 and has remained consistently high for a sustained period having not fallen below 5.5 since 2003.
- 3.25 A closer review on the private rental market<sup>24</sup>, reinforces this trend in unaffordability with lower quartile monthly rents in Chorley found to be at £475 pcm in 2018/19. This exceeds the average for the wider Lancashire area which stands at £450 pcm.
- 3.26 Latest market evidence<sup>25</sup> shows that the average price paid for a dwelling in Coppull over the past 12 months ranged from £105,263 for a terraced property, £142,552 for a semi-detached property and £231,500 for a detached property.
- 3.27 Taken over a five-year period, property prices have continued to rise consistently within Chorley by c.16% and are significantly above average values achieved elsewhere within Lancashire (see Graph 1). As illustrated by Table 2, it is clear that annual salary incomes haven't grown in line with rising property prices which has exacerbated the affordability issue.

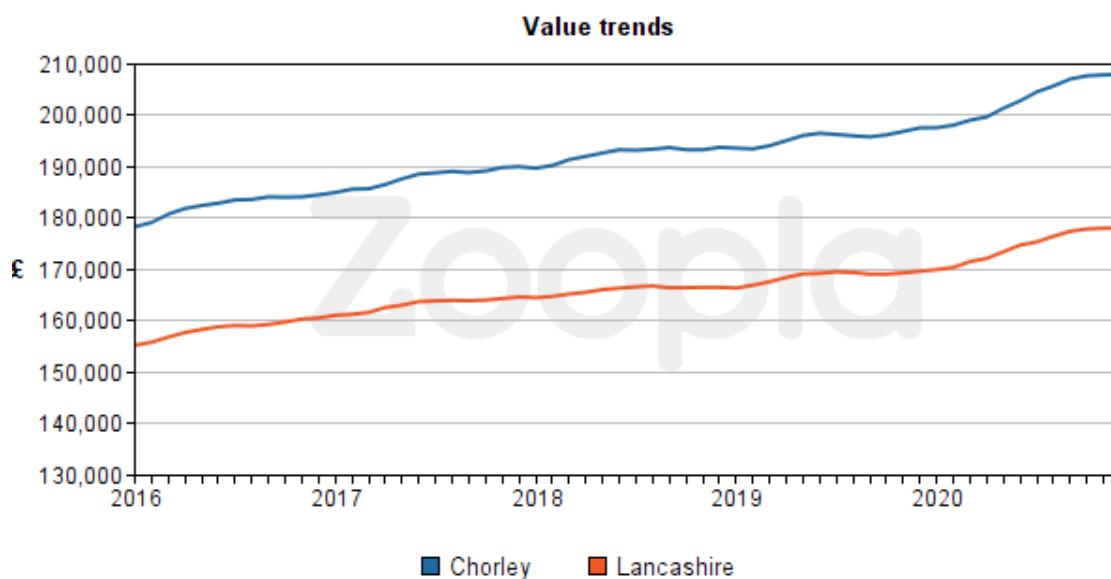
<sup>22</sup> ONS (2020) House price to residence-based earnings ratio

<sup>23</sup> ONS (2020) House price to residence-based earnings ratio

<sup>24</sup> Valuation Office Private Rental Market Statistics

<sup>25</sup> Zoopla.co.uk - <https://www.zoopla.co.uk/market/coppull/?q=Coppull%2C%20Lancashire>





Graph 1: Average Property Prices 2016-Present (Zoopla, 2020)

- 3.28 These market indicators therefore portray a clear need for new, affordable housing in order to meet local needs, something which has long been established as a key priority for Chorley Council<sup>26</sup>.
- 3.29 Indeed, the Chorley Housing Strategy 2019 – 2024 published by the Council, sets out the clear aim to:
- 'Ensure that everyone in the borough is able to access affordable and good quality housing that suits their needs. The type of tenure and where someone lives will not mean they should have to accept poorer quality or less affordable accommodation.'*
- 3.30 The associated benefits of living in high quality accommodation linked to personal wellbeing and physical health are highlighted within the strategy and emphasises the importance of ensuring that housing needs are met locally and across the Borough.
- 3.31 This level of need and demand will only increase given the 18.1% population increase projected between 2014 and 2039, and growth in household numbers by 24.6%<sup>27</sup>.
- 3.32 Both the Council's Housing Strategy and Homelessness Prevention Strategy 2019-2024 note the development of the emerging Central Lancashire Local Plan as a key priority to ensuring the changing needs in the Borough can be met. The material consideration of emerging policy is covered in more detail in Section 6.0 of this Planning Statement.

<sup>26</sup> See Chorley Sustainable Community Strategy 2010-2020; Chorley Corporate Strategy 2019/20-2021/22 and The Homelessness Prevention Strategy 2019- 2024

<sup>27</sup> Chorley Housing Strategy 2019 – 2024 (Page 1)

## **Summary**

- 3.33 The evidence underpinning the extent of the national and local housing crisis continues to grow and reinforces the worsening affordability issues that can be witnessed within boroughs such as Chorley.
- 3.34 To address this housing shortage and support a more affordable housing market, there is a clear emphasis under national planning policy to significantly boost housing supply as evidenced by the introduction of the Housing Delivery Test. Similarly, the imposition of the Standard Housing Method represents a key policy tool in ensuring that local planning authorities, particularly those unable to demonstrate a five year deliverable supply, plan for the minimum number of homes required to meet local needs.
- 3.35 The matter of housing land supply is considered in more detail in Section 6.0 of this Planning Statement.

## **4.0 The Proposed Development**

- 4.1 This application seeks outline planning permission with all matters reserved (except access) for residential development of up to 123 dwellings.
- 4.2 The accompanying Parameters Plan sets out the key constraints and opportunities which have informed the design development of the site, with the Illustrative Masterplan providing an illustration of how the site could accommodate 123 dwellings while providing the following:
- 4.3 The scope of the application includes the following:
- Up to 123 dwellings laid out within a low-density arrangement with the opportunity for a mix of house types and size;
  - Affordable housing provision of 30% (37 dwellings) in accordance with Core Strategy Policy 7;
  - Vehicular access provided off Grange Drive through two separate access points which connect to provide a looped main spine road and opportunity for improved pedestrian access onto the site;
  - Structural landscape planting and the retention of existing key features including woodland and hedgerows found on-site;
  - Up to 0.81ha of public open space equating to c.15% of the site coverage. This includes a linear park proposed within the central spine of the site with opportunities for natural play identified within this area of the site and along the eastern boundary;
  - Provision of an ecological buffer zone with the adjacent Local Nature Reserve;
  - Retention of public rights of way transecting north-south (Ref: 9-10-FP 34) and west-east (Ref: 9-10-FP 35) across the site; and
  - Incorporation of a comprehensive sustainable drainage scheme to improve the management of surface water flood risk on-site.
- 4.4 The Illustrative Masterplan demonstrates how the layout can be informed by retaining and maximising the site's existing green infrastructure which provides a strong framework to inform the site layout.

## 5.0 Statement of Community Involvement

- 5.1 Engagement is a key part in formulating finalised scheme proposals to inform the submission of a planning application.
- 5.2 We have approached this engagement both thoroughly and robustly, recognising the current constraints arising from the COVID-19 outbreak, to ensure there is awareness of the proposals and that we take on board views for it to reflect the local people, the Council and relevant stakeholders within the development process. This reflects the position of the NPPF<sup>28</sup> and NPPG which promotes early engagement to improve the efficiency and effectiveness of the planning application process.
- 5.3 Planning guidance states that pre-application consultation with communities, local authorities and statutory consultees can bring a number of benefits to the process of determining planning applications. Against this background, the applicant has sought to consult with interested parties, in accordance with guidance in relation to community involvement in the planning system.

### Policy Context

#### *National Planning Policy Framework*

- 5.4 The National Planning Policy Framework (the Framework) sets out the benefits of pre-application discussions within a section titled '*pre-application engagement and front loading*'. Paragraph 39 of the Framework states that '*early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community*'.

#### *Planning Practice Guidance*

- 5.5 With regard to consultation and community engagement, the PPG notes: '*Pre-application engagement by prospective applicants offers significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications and their likelihood of success*'.

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<sup>28</sup> National Planning Policy Framework (2019) Para. 39

*Chorley Council Statement of Community Involvement (2019)*

- 5.6 Chorley Council's Statement of Community Involvement states how the Council will engage with interested parties in the preparation, alteration or revision of the various components of the Development Plan and in the decision-making process for planning applications.
- 5.7 The Statement seeks to: *'provide the community with clarity on the levels of involvement and engagement that they should expect in planning processes. It gives a level of certainty to key stakeholders, the general public and representative organisations as to how they can be involved in plan making and development control management processes.'*
- 5.8 The Statement does not provide any specific requirements for the approach to adopt in engaging with interested parties, but instead highlights that *'The Council encourages developers to talk to those who may be affected and refine their proposals while they are at a formative stage'*. Developers and applicants are expected to utilise the approach they consider most appropriate, but recognise *'the earlier consultation takes place, when proposals are being formulated, the better'*.
- 5.9 The section below provides a summary overview of the pre-application engagement held with the Council and Statement of Community Involvement submitted as part of the application.

**Engagement with Chorley Council**

- 5.10 A pre-application advice request was submitted to Chorley Council on 18<sup>th</sup> September 2020. The request was submitted in order to ascertain detailed feedback on the outline proposals in relation to both planning and technical matters.
- 5.11 On submission of a pre-application request, the applicant was made aware that given current working circumstances due to the COVID-19 outbreak, that the Council are not currently providing this service. The applicant continued to communicate with officers of progress of the application preparation and intention to submit a planning application but to date received no response.
- 5.12 Notwithstanding this, the applicant sought to gauge views locally of the proposals by undertaking a public consultation within the surrounding area along with engaging with local ward members.

**Engagement with the Public and Other Local Political Stakeholders**

- 5.13 Given the COVID-19 outbreak a public consultation event was undertaken via a leaflet drop within the local community with an opportunity for residents to provide feedback by email.
- 5.14 The leaflet (see **Appendix 1**) advised on the consultation process and details on the proposals, with the catchment area defined as the local community within the immediate surrounding area of the application site. This covered a total of 190 households.
- 5.15 The public consultation ran for a period of two weeks, between 20<sup>th</sup> November and 4<sup>th</sup> December 2020. Feedback was invited throughout the entirety of the consultation window, with a dedicated email address available during this time.
- 5.16 Feedback from the 12no. responses received from the consultation is summarised below. The leaflet made clear that comments will continue to be monitored and duly considered through the determination of the application.
- 5.17 Elements of the scheme that were supported and welcomed by the local community included:
- The identified opportunities for areas of children's play and the location of this within the scheme layout, noting the issues on existing provision at Manor Way.
  - New housing provision within the local area to support new homebuyers and those looking to move property.
  - The importance of retaining and providing good pedestrian and transport links.
- 5.18 Areas of concerns or consideration raised through the consultation included:
- **The loss of wildlife and habitats** – the supporting Preliminary Ecological Appraisal and Preliminary Arboricultural Impact Assessment provide a technical assessment to confirm how the scheme will retain as far as possible existing habitat and landscape features and result in a limited / negligible impact on wildlife (including protected species). Opportunities for environmental enhancements have been identified including establishing ecological buffers and landscape planting, the details of which can be confirmed at the reserved matters stage.
  - **Loss of green space in the area** – while the loss of greenfield land is will result from the proposals, the site is not currently accessible to the public. The scheme

will secure up to 0.81ha of amenity open space and supporting green infrastructure (see Illustrative Masterplan).

- **Road safety impact arising from increased traffic generation and poor visibility at the existing roundabout junction of Spendmore Lane/ Grange Drive** – this is considered in detail within the accompanying Transport Assessment which confirms there will be no severe impact upon the highway network or road safety.
- **Increase air pollution arising from traffic generation** – the supporting Air Quality Assessment addresses this point and notes the level of traffic generation will only marginally exceed screening thresholds and have no significant impact upon local air pollution.
- **Increased flood risk** – the accompanying Flood Risk Assessment confirms that development of the site will not result in increased flood risk on-site or elsewhere. An outline drainage strategy supports the application to demonstrate how surface water and foul sewage will be appropriately managed and make use of sustainable methods.
- **Concerns on traffic and noise associated with the construction phase** – it is expected that Chorley Council will impose a planning condition on the grant of planning permission which will require details of the method and management of construction of the proposed development. This will ensure that effects on local residents are minimised.
- **Additional pressure on local services and facilities (schools and GPs)** – Coppull is identified by the Council as a Tier 2 settlement and one of the most sustainable settlements within the Borough, owing to its excellent connectivity to key services and amenities. The settlement is identified as having potential to accommodate further growth, as recognised by the site's draft allocation for housing, which confirms the sustainability of the area.

5.19 Individual letters were also issued to local ward members to provide an opportunity for further discussion on the proposals and consider any particular local concerns.

5.20 The applicant is committed to continuing to monitor and carefully consider responses from the local community that raise material points and remain open to further engagement with local political stakeholders through the planning process.

## 6.0 Planning Policy Context

- 6.1 This section considers the consistency of the proposed development with relevant policies of the development plan and the weight to be attached to these policies in decision making.
- 6.2 Drawing upon the Inspector's conclusions within the recent appeal decision at Pear Tree Lane, Euxton (Ref: APP/N4720/W/17/3169594), this section provides an assessment on those policies 'most important' for the determination of this planning application and the extent to which they are deemed to be out of date.

### The Development Plan

- 6.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.4 In this context, this Section considers the applicable development plan policies; their consistency with the NPPF and; the weight to be applied to these policies.
- 6.5 The adopted development plan currently comprises of the Central Lancashire Core Strategy (2010-2016) and Chorley Local Plan: Site Allocations and Development Management Policies (2012-2026).

### Central Lancashire Core Strategy (2010-2026)

- 6.6 The Central Lancashire Core Strategy was adopted in 2012, covering each of the three local authorities of Chorley, Preston and South Ribble. The Core Strategy provides the strategic policy framework to inform individual local planning authorities on site-specific policy matters and allocations.
- 6.7 Core Strategy Policy 1 (Locating Growth) identifies Coppull within the hierarchy of settlements across Central Lancashire where growth and investment will be concentrated. While the main focus of growth will be directed to the Preston/ South Ribble Urban Area, within Chorley the Urban Local Service Centres are identified as playing a key role in accommodating some of the borough's employment and housing needs.
- 6.8 Coppull is identified as one of six Urban Local Service Centre, where "*some growth and investment will be encouraged... to help meet housing and employment needs*". The



supporting text identifies these settlements as highly sustainable given their existing infrastructure and services, and connectivity to Key Service Centre Towns such as Chorley and Leyland. These settlements will deliver 9% of the total growth of the plan over the plan period, the equivalent to 2,100 net additional dwellings.

- 6.9 Proposed residential development in this location therefore fully accords with the spatial distribution and requirements of Policy 1 in meeting housing needs across the Borough. This represents a material consideration in favour of the application.
- 6.10 Core Strategy Policy 4 (Housing Delivery) sets a requirement for housing delivery in Chorley of 417 dwellings per annum, equating to a minimum housing requirement of 6,672 dwellings over the plan period. Importantly, this housing requirement is informed by the Central Lancashire Core Strategy which apportions the spatial distribution of housing needs across the three Central Lancashire authorities.
- 6.11 This requirement is however underpinned by the North West of England RSS targets which pre-dates the imposition of the National Planning Policy Framework and subsequent requirement to base strategic policies and housing targets upon (as a minimum) objectively assessed needs.
- 6.12 Policy 7 (Affordable Housing) seeks to enable sufficient provision of affordable and special needs housing to meet local needs. The Policy seeks to achieve a target from market housing schemes of 30% in the urban parts of Preston, South Ribble, and Chorley. The proposals are in full accordance with this policy and will secure 30% on-site affordable housing under a S106 Agreement.

#### ***Chorley Local Plan (2012-2026)***

- 6.13 Adopted in July 2015, the Chorley Local Plan 2012-2026: Site Allocations and Development Management Policies Development Plan Document identifies the scale of development in each settlement and allocates sites over the plan period in order to meet the Council's vision on housing and economic growth.
- 6.14 Policy HS1 (Housing Allocations) sets out the housing allocations to cover the period until 2026 in order to meet the housing requirement for the borough. These allocations are however aligned to an out-of-date requirement based upon the former North West of England Plan RSS.
- 6.15 Policy BNE3 (Areas of Land Safeguarded for Future Development Needs) states that in order to ensure the long term protection of Green Belt boundaries, only development permitted in the Green Belt and Area of Other Open Countryside will be granted. In

accordance with Paragraph 85 of the NPPF, Safeguarded Land is by virtue to be protected in order to meet long term future development needs.

- 6.16 Policy BNE3.6 (Blainscough Hall, Coppull) identifies the application site as safeguarded land. The Council's housing requirement is predicated on out-of-date evidence and additional sites, such as the application site, to remedy the housing shortfall in the Borough. The planning statement and submitted supporting documents demonstrate the site is sustainable and suitable for housing and would form a logical extension to the existing settlement.

### **Emerging Central Lancashire Local Plan**

- 6.17 The Emerging Central Lancashire Local Plan is being prepared by Preston, South Ribble, and Chorley Council with a formal decision taken to produce a single Central Lancashire Local Plan.
- 6.18 Following rounds of 'Call for Sites' consultation undertaken in 2018 and 2019, an Issues & Options document was published for consultation with several suggested sites for future development, including proposed housing allocations.
- 6.19 In February 2020 representations were made on behalf of the applicant in support of the Central Lancashire Local Plan: Issues & Options Consultation following the draft allocation for housing development at the Blainscough Hall site. The application site has also been assessed under the Strategic Housing and Employment Land Availability Assessment for housing, albeit the detailed site assessment is not available online.
- 6.20 Elected members from Chorley Borough Council were consulted on the Issues and Options Document, with one specific comment raised on the Blainscough Hall site which indicated that the
- 'parish council at last local plan preparation requested this as a housing allocation to protect other areas. Blainscough is not as 'valuable' a site to the Parish Council.'*<sup>29</sup>
- 6.21 This perceived support from the Parish Council provides an interesting insight into the extent to which the application site can be seen as playing an important role within the local area. As is suggested by the submitted comment, this is not considered to be significant.

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<sup>29</sup> Central Lancashire Local Plan: Issues and Options Consultation (2019) Chorley Council Elected Members Comments on Site Suggestions (p.10)

- 6.22 The Councils' latest position on local plan preparations, highlighted by the Local Development Scheme reported to the Central Lancashire Joint Advisory Committee on 28th January 2020, shows that initial timescales and programming have been significantly delayed by more than a year. The Preferred Options consultation will now take place in mid-2021, with submission to the Planning Inspectorate projected for early 2023 and adoption later that year - two years on from the when the plan period beginning in 2021.
- 6.23 Noting the provisions of Paragraph 48 of the NPPF, only limited weight can be attributed to emerging policy given the relatively early stage of the plan-making process. Notwithstanding the limited weight afforded to the policy, the proposed housing allocation represents a material consideration which carries weight in favour of the proposed development.
- 6.24 Any concerns on prematurity grounds are also set out in more detail under Section 7.0.

**Appeal Decision - Land at Pear Tree Lane, Euxton (Ref: APP/D2320/W/20/3247136)**

- 6.25 Similar to land at Blainscough Hall, the appeal site at Euxton was also allocated land as 'Areas of Land Safeguarded for Future Development Needs' under Policy BNE3 of the adopted Chorley Local Plan. The proposed development under this appeal sought to deliver 180 dwellings across associated public open space and landscaping. Of the 180 proposed dwellings, 30% would be for affordable housing by way of a tenure mix of 70% social rented and 30% intermediate units, with a further 10% available for self-build or custom house building plots.
- 6.26 The sub-section reviews this key appeal decision for Chorley and the implications on matters such as five-year housing land supply.

**Five Year Housing Land Supply**

- 6.27 At the heart of the appeal was the debate over Chorley's exact housing requirement. While Policy 4 under the Chorley Local Plan sets out a minimum housing requirement of 417 dwellings per annum (dpa) to 2026, it was noted that these figures were based on a development plan that had been adopted over 5 years ago without having been reviewed. In accordance with Paragraph 73 and footnote 37 of the NPPF, this requirement was considered out of date and triggered a need to adopt the standard method in calculating Local Housing Need (LHN). Based on the standard method, Chorley's minimum LHN was confirmed at 569 dpa.

- 6.28 The evidence presented by the Council under a Memorandum of Understanding (MOU2) prepared in April 2020 between the three local planning authorities of Chorley, Preston and South Ribble, argued a lower housing requirement for Chorley of 278dpa. This evidence was informed by the recently published Central Lancashire Housing Study (2020) which seeks to aggregate the three LPAs minimum LHN and redistribute these housing needs across the Central Lancashire area. This apportionment was to reflect growth aspirations, relative affordability within districts and deliver what the Councils viewed as the most sustainable patterns of development. As set out below the Council argued that Chorley should deliver 27.5% of this housing requirement across the Central Lancashire area:

Area	Standard Method LHN		MOU2 Redistribution	
	Dpa	% of total	Dpa	% of total
Chorley	569	56.3%	278	27.5%
Preston	191	18.9%	404	40%
South Ribble	250	24.8%	328	32.5%
Central Lancashire	1,010	100%	1,010	100%

- 6.30 The crux of the debate over housing requirement was therefore the weight to be attached to the standard method applied for Chorley of 569dpa or the requirement of 278dpa set out under MOU2 (a significant 51% reduction on the standard method).
- 6.31 In determining the level of weight to be attributed to these figures, the Inspector concluded that 'limited weight' be attached to the housing requirement figure for Chorley of 278 dpa on the basis that the CLLP remained at a very early stage of preparation. In contrast, full weight was attached to the standard method LHN figure for Chorley, given its clear consistency to the NPPF and PPG. The appeal decision there makes clear that the minimum housing requirement for Chorley is 569dpa.
- 6.32 In assessing the Council's deliverable supply of housing land, figures ranged from both parties between 1,617 and 1,505 dwellings. While debate was had on the deliverability of the Cowling Farm allocation, even taking the Council's higher figure of 1,617, this would only deliver a 2.7 year supply on the basis of identified housing requirement. The Inspector therefore concluded that the Council are unable to demonstrate a deliverable five-year supply of housing land and in fact have a significant shortfall.

### **Weighting Given to 'Most Important Policies'**

- 6.33 In accordance with paragraph 11(d) and Footnote 7, where an LPA are unable to demonstrate a five-year supply of deliverable housing land, the NPPF makes clear that

those policies most important for determining the application are to be considered out of date.

- 6.34 This application site and the appeal site at Pear Tree Lane, Euxton, share key similarities given their allocation as Safeguarded Land under the Chorley Local Plan. Paragraph 139 of the National Planning Policy Framework makes clear that planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development.
- 6.35 In assessing the 'most important' policies' relevant to this application and the extent to which they could be considered out of date, the appeal decision at Pear Tree Lane provides the most recent and robust assessment from which to determine the proposed development. The Inspector judged the most important policies to be Policy BNE3, Policy 1 and Policy 4 of the Chorley Local Plan.
- 6.36 It was acknowledged that the housing requirement set out under Policy 4 was based on the former Regional Spatial Strategy for the North West, which in turn relied on the 2003-based household projections. Taken against the introduction of Standard Method under the 2018 NPPF and further update in 2019, along with more recent 2014-based household projections, it was concluded that Policy 4 was out-of-date.
- 6.37 Policy 1, however sets out a positive growth strategy concentrated in Chorley town with some to be located at Coppull and other local service centres in the borough. It was recognised that the policy does not in itself define settlement boundaries or limit development only to sites within settlements in Chorley borough, and therefore would not unreasonably strain development and meeting the LHN requirement. Policy 1 was therefore not deemed to be out of date.
- 6.38 Of significance and relevance to this application, was the assessment on Policy BNE3. The policy seeks to constrain development of the site within the current plan period (2026), in order to ensure the long-term protection of the Green Belt. These boundaries are however underpinned on a housing requirement in the Central Lancashire Core Strategy which has been identified as out-of-date. The Inspector took note of evidence demonstrating that these boundaries were set out in the 1997 Chorley Borough Local Plan, retained following a 2003 review and continue to be based on a housing requirement under Policy 4 aligned to an out-of-date RSS. Policy BNE3 was therefore also concluded as being out-of-date. Reference can be made to relevant Case Law<sup>30</sup>, which confirms the principle that settlement boundaries can be deemed out-of-date

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<sup>30</sup> Suffolk Coastal District Council v Hopkins Homes Ltd and anr [2017] UKSC 37 [paragraph 63]

on the basis they derive from outdated housing requirements. In this context, Policy BNE3 is concluded as constraining growth and the Council's ability to meet housing need.

- 6.39 This conclusion was reinforced by the Emerging CLLP, where all but one safeguarded area has been allocated for development from 2021 to 2036. By virtue of the proposed plan period under the Emerging CLLP, it is accepted that earlier release of safeguarded land is required prior to 2026 in order to meet development needs. While accepting the limited weight that can be given to emerging policy, the Inspector concluded that *'its recognition that Safeguarded Land, including the appeal site, may be released for housing development in the near future, is a material consideration which reduces the weight that can be given to the conflict with Policy BNE3 in this appeal'*<sup>31</sup>.

## **Summary**

- 6.40 Noting the planning context which underpins the application site, it is concluded that the most important policies deemed relevant to determining the appeal at Pear Tree Lane, are equally applicable to this planning application.
- 6.41 Taken as a whole, the appeal decision confirms that these policies are out-of-date and therefore triggers the 'tilted balance' under paragraph 11(d) of the NPPF.

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<sup>31</sup> Appeal Decision – Ref: APP/D2320/W/20/3247136 (Para. 97)

## **7.0 The Case for Development**

- 7.1 This section sets out an assessment of the proposed development against policy related to the principle of the use of the land for housing and assesses the suitability of the site for the proposed development

### **Boosting Supply and Providing for Housing Choice**

- 7.2 The detailed context provided in Section 3.0 of this Planning Statement demonstrates the magnitude of the housing crisis both nationally and locally. This reinforces the key benefits of securing up to 123 new homes and valuable contribution the development can make towards addressing local needs and the government's objective of building 300,000 homes per year.
- 7.3 The NPPF is unequivocal that housing applications should be considered in the context of the presumption in favour of sustainable development and relevant development plan policies cannot be considered up to date if a local planning authority is unable to demonstrate a 5 year supply of deliverable housing sites.
- 7.4 While Policy 4 of the Central Lancashire Core Strategy set an annual requirement of 417 dwellings per annum within Chorley over the plan period, this policy has been found to be clearly out of date given its evidential basis is aligned to historic RSS targets. In the absence of a footnote 73 review of the Development Plan, the new standard method requirement stands at a minimum of 569 dwellings per annum.
- 7.5 Indeed, the appeal decision in Euxton, confirms the Council's inability to evidence a five-year supply of deliverable sites. At just 2.7 years, the magnitude of this shortfall in housing supply is significant. .
- 7.6 The proposals are consistent with the spatial strategy for directing growth to Urban Local Service Centres such as Coppull to meet housing and employment needs as set out under Policy L1 of the Central Lancashire Core Strategy. The policy makes clear that a proportionate amount of development and urban extension should be found adjoining smaller, sustainable settlements such as Coppull, provided this remains in keeping with the local character and setting.
- 7.7 To this end, the scale of development proposed does not constitute significant development and will not change the role of Coppull as an Urban Local Service Centre. The proposed development is reflective of the scale and density of the

established residential area to the immediate north of the site and forms a logical extension up to a strongly defined and defensible boundary.

- 7.8 The development of up to 123 dwellings will therefore support the growth requirements of the local area and Borough as a whole and is therefore considered acceptable in principle. The Chorley Local Plan<sup>32</sup> recognises that the policy '*does not indicate how many new homes should be built in each town or village*', however it is clear that the scale of development proposed is appropriate to the site's context and will not change the role of Coppull as a sustainable village.
- 7.9 The proposals are therefore proportionate to ongoing growth and meeting local needs for housing and should clearly be identified as being in the right place. The matter on whether it is the right time for development when considering its effects on housing land supply are considered later within this section.
- 7.10 The site's draft allocation for housing under the Central Lancashire Local Plan reinforces the argument that the proposed development is of an appropriate scale and spatial location.

### **Addressing Affordable Housing Needs**

- 7.11 It is clear from the evidence set out below and detailed in Section 3.0 that Chorley Council are experiencing growing affordability issues, with rising property prices a particular constraint to people accessing the housing ladder based on earnings ratios (see Table 2).
- 7.12 Adopted in 2012, the Central Lancashire Affordable Housing Supplementary Planning Document advises on the implementation of the Council's affordable housing policy and the spatial distribution of this provision across the Housing Market Area (HMA) of Central Lancashire.
- 7.13 Paragraph 14 refers to the conclusions of the 2009 Strategic Housing Market Assessment (SHMA) which identifies an estimated annual shortfall of 723 affordable homes within Chorley, the highest in the HMA. In contrast, this shortfall is at 397 and 660 per annum in Preston and South Ribble respectively.
- 7.14 The updated 2017 SHMA, provided a more recent evidence base to understand the extent of this shortfall. Indeed, the 2017 assessment found an annual requirement of 620 affordable dwellings per annum across the HMA – a total of 12,400 units over the

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<sup>32</sup> Chorley Local Plan (2015) Para. 5.11



plan period to 2034. More specifically for Chorley, this annual requirement was assessed at 146 dwellings per annum.

- 7.15 The Central Lancashire Housing Study (2020) adjusts this net need to 590 dwellings per annum across the HMA with 132 affordable dwellings required annually in order to meet local needs within Chorley. This is evidently well over and above the annual requirement set out under Policy 7 of the Central Lancashire Core Strategy, which at 50 affordable dwellings per annum and noting the level of identified need historically across the HMA, appears to have no evidential basis underpinning this target.
- 7.16 Delivery rates in affordable housing are summarised in Table 3 below, demonstrating an annual completion rate of 145 dwellings:

Year	Units
2009/10	81
2010/11	173
2011/12	170
2012/13	183
2013/14	129
2014/15	165
2015/16	85
2016/17	87
2017/18	172
2018/19	202
<b>Total</b>	<b>1,447</b>

Table 3 – Annual affordable housing delivery (2009-2019)

- 7.17 Notwithstanding this rate of delivery, there is a real need for the Council to continue to ensure a strong supply of affordable housing, something which the Central Lancashire Housing Strategy and NPPF<sup>33</sup> emphasises. Paragraph 5.22 of the study more specifically highlights the '*substantial need for additional affordable housing*' and that '*the Councils should seek to maximise delivery where opportunities arise*'.
- 7.18 Section 3.0 of this Planning Statement provides the full context on national planning reform to address this issue and the extent to which unaffordability (both nationally and locally) is increasingly preventing people from accessing the housing ladder. While planning reform continues to grapple with this important issue and the statistics which

<sup>33</sup> National Planning Policy Framework (2019) Para. 61

can often predominate debates around the housing crisis, the realities of increasing unaffordability are far more pressing.

7.19 This has been highlighted by the recent study undertaken by the Affordable Housing Commission. The study identified that for the many who are unable to access the housing market or are found paying disproportionate outgoings on monthly rents, the following impacts on wellbeing and life prospects with<sup>34</sup>:

- Nearly a third (31%) of UK parents with adult children living at home, not expecting them to move out, and if so, then not for at least 10 years. Nationally, this could be affecting 2.4million people.
- 13% of UK adults polled (under the age of 45 in a couple) and potentially 1.8million people nationwide have decided to delay having children due to their housing situation and ability to afford to live.
- 13% of the survey recognised that housing stress is a major worry for people and a strain on their mental health. This rises to 25% for those living in unaffordable accommodation.

7.20 Studies such as this come as a timely reminder in highlighting the real importance of delivering new, affordable homes of a suitably high quality.

7.21 Delivering affordable housing is a clear priority for the Council as identified within key housing and corporate strategies and is urgently required. Therefore, the proposed contribution of 30% on-site provision, equating to 37 new affordable homes, represents a key benefit in favour of the development which should be attributed significant weight.

## **Development of Safeguarded Land**

### ***The Timing of Development***

7.22 The Chorley Local Plan identifies the site as Safeguarded Land under Policy BNE3 and is therefore not within the Green Belt. Under exceptional circumstances or following a Local Plan Review, safeguarded land can be released, however the policy does not specify that the lack of a five year housing land supply as one of the circumstances in which the safeguarded land could be released for development.

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<sup>34</sup> Affordable Housing Commission (2020) Making Housing Affordable Again: Rebalancing the Nation's Housing System (P.55)

- 7.23 Recognising the role of safeguarded land to meet future development needs beyond the Plan Period, it may be argued that consideration on the release of such sites should be post-2026 at the end of the Chorley Local Plan.
- 7.24 Taking a balanced view with reference to other major, appeal decisions (Ref: APP/N4720/W/17/3169594) relevant to the development of safeguarded land, there would be no basis for concluding that Policy BNE3 is *'rendered out-of-date, or even dated, simply because the Council is presently unable to demonstrate a five-year housing land supply'*<sup>35</sup>.
- 7.25 With reference to relevant Case Law<sup>36</sup> in determining the appeal at Pear Tree Lane<sup>37</sup>, the Inspector concludes, unequivocally, that the settlement boundaries around settlements such as Coppull, are tightly defined and out-of-date given their reliance upon out-of-date housing requirements<sup>38</sup>. Safeguarded land such as the application site is therefore noticeably constrained by Policy BNE3 which *'is preventing the Council from being able to provide an adequate housing land supply, against its standard method LHN within the current plan period to 2026'*<sup>39</sup>.
- 7.26 In concluding Policy BNE3, along with other 'most important policies' as out-of-date, and subsequently triggering the 'tilted balance' under Paragraph 11(d) of the NPPF in the process, adds further weight to any proposed housing provision in the context of the Council's significant shortfall in housing land supply.
- 7.27 Of particular significance is the emerging Central Lancashire Local Plan, which has explicitly identified all but one safeguarded site (including the application site) as future housing allocations to meet the needs of the borough and wider HMA from the beginning of the plan period. The site's allocation for residential development in the Issues and Options Consultation (2019) highlights the Council's anticipation for safeguarded land to be brought forward sooner to meet housing needs – starting from 2021. As the Inspector concludes in the appeal at Pear Tree Lane, *'this is a material consideration which reduces the weight that can be given to the conflict with Policy BNE3 in this appeal'*<sup>40</sup>.
- 7.28 This would appear a logical approach given the majority of housing allocations under the Chorley Local Plan have already been or are actively being developed out. This is

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<sup>35</sup> Appeal Decision – Ref: APP/N4720/W/17/3169594 (Para. 6.12)

<sup>36</sup> Suffolk Coastal District Council v Hopkins Homes Ltd and anr [2017] UKSC 37 [paragraph 63]

<sup>37</sup> Appeal Decision – Ref: APP/D2320/W/20/3247136

<sup>38</sup> Under Policy 4 of the Central Lancashire Core Strategy

<sup>39</sup> Appeal Decision – Ref: APP/D2320/W/20/3247136 (Para. 49)

<sup>40</sup> Appeal Decision – Ref: APP/D2320/W/20/3247136 (Para. 97)

particularly relevant to Coppull, where of the 6 sites allocated under the Chorley Local Plan to deliver housing during the plan period (up to 2026), three sites have already been completed (totalling 167 dwellings). Two sites have shown no progress or evidence of commencing and currently have no implementable planning permission, while the Mill Lane site has recently received planning permission for 75 dwellings. The remaining two allocations include the application site and the Land north of Hewlett Avenue – both as Safeguarded Land.

- 7.29 Ensuring a continuous supply on deliverable sites is key to facilitating growth, particularly for highly sustainable settlements such as Coppull which has continued to grow in population and as one of the largest Urban Local Service Centres within the Borough (see Table 4).

Settlement	2001	2011	Mid-2017 Estimate
Coppull	7,637	7,959	8,189
Adlington	5,270	6,010	6,583
Clayton Brook/ Green*	6,867	6,775	7,059
Clayton-le-Woods	14,605	14,532	15,466
Euxton	8,318	9,993	12,213
Whittle-le-Woods	4,553	5,434	6,874

Table 4: ONS figures for population growth in Urban Local Service Centres in Chorley

\* ONS figures for Clayton Brook/ Green are derived from Clayton-le-Woods North.

- 7.30 Recognising that the majority of Urban Local Service Centres (Tier 2), are located to the north of Chorley, this emphasises the need for development to come forward in this part of the Borough and meet current needs in order to avoid the risk of becoming overly concentrated to a single area. This outline proposal presents an opportunity to secure development to the south of Chorley, ensuring growth is balanced and further increasing housing opportunities for residents across the Borough.
- 7.31 The Chorley Local Plan 2012-2026 Policies Map (July 2015) illustrates the extent of Green Belt across the Borough and how tightly this defines settlement boundaries. Noting this constraint to development, the next priority for the Council to meet needs should therefore be delivering those sites considered most sustainable and suitable for larger development – that being safeguarded land allocated for housing under emerging planning policy.
- 7.32 In sum, this Outline planning application not only represents development coming forward in the right location, but importantly, at the right time.

**Prematurity to Emerging Planning Policy**

- 7.33 The National Planning Guidance states that in the context of the presumption in favour of sustainable development, arguments that an application is premature are unlikely to justify a refusal of planning permission other than in exceptional cases, where it is clear that any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits. Such grounds may include<sup>41</sup>:
- The development would be so substantial, or its cumulative effect would be so significant that to grant permission would undermine the plan making process.
  - The emerging plan is at an advanced stage but not yet part of the development plan for the area.
- 7.34 In this instance, the application site is up to 123 dwellings. This is not considered so substantial that development of the site would undermine the plan-making process as it represents just 0.8% of the Plan requirement up to 2036 (15,495 dwellings).
- 7.35 As detailed throughout this report the Council cannot currently demonstrate a five-year housing land supply, indeed there is a significant shortfall at just 2.7 years. It is therefore imperative that sustainably located sites can contribute to addressing the shortfall and are brought forward at the earliest opportunity.
- 7.36 In allocating the site as a housing allocation in the Issues and Options Consultation 2019 as preparation of the Central Lancashire Local Plan, the Council deemed the site to be in a sustainable location and suitable for residential development for the plan period which was to begin from 2021.
- 7.37 In terms of the second criteria, the appeal decision (Ref: APP/N4720/W/17/3187334) at Land south of Pool Road, Pool in Wharfedale provides a useful reference for determining the extent to which emerging planning policy can be deemed to be sufficiently advanced. The appeal similarly related to the release of safeguarded land to meet housing needs, with the Inspector in that case taking the view that PPG means '*that the emerging plan should be sufficiently advanced to be not yet formally part of the development plan, ie that the examining Inspector's Main Modifications have been published, so that it is reasonably clear what final form the plan would take, even though it has not been finalised or formally adopted*'<sup>42</sup>.

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<sup>41</sup> National Planning Policy Framework (2019) Para. 49

<sup>42</sup> Appeal Ref: APP/N4720/W/17/3187334 (Para. 84)

- 7.38 Paragraph 50 of the NPPF makes clear that '*Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination*'. While the plan is relatively advanced it has not progressed sufficient enough that a decision on this application would so undermine the plan as to justify a refusal of permission.
- 7.39 There is current uncertainty over the timescales for the draft emerging plan being published and submitted for examination, meaning inevitable delay on the programme set out in the Council's Local Development Scheme.
- 7.40 The aforementioned policy support for housing under the emerging plan (albeit accepting that limited weight can be attached), coupled with the significant housing shortfall within Chorley underpins the rationale as to why the timing of the proposed development on safeguarded land should take place now in order to meet development needs.
- 7.41 It is therefore considered that there is no sound basis to refuse planning permission on the grounds of prematurity and prejudicing the plan-making process.

## **Achieving Good Design**

### ***Housing Mix and Density***

- 7.42 This application is in outline form with all matters reserved save for access. This means that housing mix and density will be considered in detail at the reserved matters stage. Notwithstanding this, the Illustrative Masterplan shows the flexibility of the site to accommodate a broad range of house types and sizes to meet needs as informed by the findings of the SHMA (2017). The assessment projects a focus on new market housing provision accommodating two- and three-bed properties, and states that a '*continued demand for family housing can be expected from newly forming households*'<sup>43</sup>.
- 7.43 Notwithstanding this, this application has been prepared with consideration to Policy 5 of the Central Lancashire Core Strategy which seeks to secure densities in keeping within the surrounding context and ensuring that there is no detrimental impact on the amenity, character, appearance, distinctiveness, and environmental quality of an area. The policy adds that this should also be balanced against the need to make

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<sup>43</sup> Central Lancashire Strategic Housing Market Assessment (2017) p.169

efficient use of land, as also required by the NPPF<sup>44</sup> with specific reference in areas with identified housing shortage.

- 7.44 These proposals have been designed to reflect the requirements of the Central Lancashire Design Guide SPD (Oct 2012) in order to ensure that residential amenity is supported. While the SPD does not specify set standards relating to separation distances, a considered approach has been taken to ensure that issues of overlooking and privacy are addressed.
- 7.45 The application proposes a low-density housing development that reflects the 'tiered' character of the adjoining area and illustrates how articulation of various house types can create visually interesting streetscapes in line with Core Strategy Policy 17, Central Lancashire Design Guide SPD and Paragraph 127 of the NPPF.
- 7.46 The Design and Access Statement recommends any future proposal utilises high-quality materials and finishes, that reflect the rudiments of local vernacular design, which combined would create an attractive and sustainable living environment for future residents.

### **Layout**

- 7.47 Whilst layout is a matter which will be considered as part of the reserved matters application, the Illustrative Masterplan (Ref: LH.BH.IMP.01) shows how the site could be laid out to support a high-quality scheme which:
- Is in-keeping with the density character of the surrounding area;
  - Protects the existing residential amenity of adjoining residents through appropriate setbacks and complementary natural landscaping;
  - Retains and enhances existing green infrastructure to provide a strong framework for the site layout as well as visually screening the proposals in more sensitive locations, including the adjacent neighbouring properties and industrial uses;
  - Allows for 0.81ha of open space provision across the site with areas of natural play suitably located in order to promote the safety and amenity of future residents and children;

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<sup>44</sup> National Planning Policy Framework (2029) Para. 123

- Provides an appropriate road hierarchy with the principal access coming from Grange Drive, with properties orientated towards the proposed access road to create an active and attractive residential streetscene; and
- Connects to existing transport and pedestrian networks, including enhanced green infrastructure around the two public rights of way which transect the site.

7.48 Development of this greenfield site will introduce changes to the area and some urbanising effects. However, the layout has been sensitively designed to ensure that the perceived impact on Coppull is minimised and acceptable, most noticeably through the provision of extensive open space and green infrastructure.

7.49 The illustrative layout seeks to retain as much of the existing landscape features as possible, including the existing woodland and mature tree cover which screens the site along the western, southern and eastern boundaries and helps to frame the new development.

7.50 In summary, the illustrative layout put forward in this application demonstrates a well-considered approach to place-making in creating a new residential neighbourhood within Coppull while paying regard to the local context and sense of place within the local area. The Core Strategy Policy 17, Central Lancashire Design Guide SPD and Paragraph 127 of the NPPF.

### **Conserving and Enhancing the Natural Environment**

7.51 As with any greenfield site, the development will introduce changes to the area and some urbanising effects. The design team has therefore sought to take a sensitive approach to development of the site and minimising any perceived impact to the local area.

7.52 At the heart of this approach has been the retention and enhancement of existing green infrastructure which provides a strong framework for the layout. This includes the retention of existing woodland. These trees add to the rural sense of place and provide a strong boundary to the west, south and east of the site. Existing hedgerows will be reinforced with additional structural planting across the site to create a range of habitats for local wildlife.

7.53 Moreover, ecological buffers have been established to support the Local Nature Reserve located to the east.



- 7.54 Full details on potential ecological and arboricultural impacts and indicative or proposed mitigation measures are considered in Section 8.0. This also evidences the efforts made to respect the site's context, the absence of any significant adverse effects and opportunities for development to secure biodiversity net gains.

## **8.0 Technical Assessment**

- 8.1 Noting the Council's proposed allocation of the site under the Issues and Options Consultation, it is clear there is an acceptance from the Council on the technical deliverability of the site.
- 8.2 Notwithstanding this, additional technical assessments have been undertaken to further evidence this point and reinforce the site's credentials.

### **Transport and Highways**

- 8.3 Eddisons has prepared a Transport Assessment to support the planning application which provides details on the development site, its accessibility by non-car modes, the anticipated traffic impact, and operational requirements relevant to the scheme.
- 8.4 The Transport Assessment confirms the sustainability credentials of the site in relation to local amenities, services, facilities and public transport, as detailed in Section 2.0 of this Planning Statement. The report outlines how these locational benefits will encourage residents and occupants to make use of non-car modes of transport, particularly those within the young professional/ student demographic who are less likely to commit to the financial outlay for a car.
- 8.5 The site is located within a highly accessible location and therefore seeks to promote the use of sustainable modes of transport in accordance with the planning policy guidance at both local and national level.
- 8.6 Proposed vehicular and pedestrian access via the existing access points off Grange Drive have been assessed and confirmed as suitable and safe arrangements for serving the proposed development.
- 8.7 An assessment of traffic generation has been undertaken showing that the proposed development will result in 55 two-way trips in the Weekday AM peak and 56 two-way trips in the Weekday PM peak. These flows will have no material impact on the surrounding highway network.
- 8.8 More specifically for the junction at Spendmore Lane/ Grange Drive, traffic flows are forecast to add circa 55 and 56 two-way trips during the AM and PM peak hours respectively. The potential impact at the A49 Preston Road/Spendmore Lane junction is estimated at approximately 37 two-way trips in the AM peak and 38 two-way trips in the PM peak.

- 8.9 Both mini-roundabout junctions have been assessed as benefitting from good visibility with no known capacity issues. Taking into account the level of traffic generation, the proposed development will not result in any severe impact on the operation of the local highway network or road safety. The accompanying accident analysis reinforces this position emphasising the development will not have an adverse impact on these identified junctions.
- 8.10 There are therefore no highway or transportation related reasons why planning permission should not be granted.

## **Noise**

- 8.11 A Noise Exposure Assessment has been carried out by Clement Acoustics to consider the extent of prevailing environmental noise levels across the site, particularly the industrial estate located to the south.
- 8.12 Appropriate mitigation measures are also proposed in accordance with the NPPF<sup>45</sup> in circumstances '*where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity*'.
- 8.13 The assessment provides outline parameters on those dwellings requiring higher glazing specification, as well as locations for 2m high mounding to help mitigate noise associated with HGV movements along Blainscough Lane and 3m high, solid screens to along the southern boundary to mitigate against the adjacent industrial units. These outline measures will help to achieve target internal noise levels and external levels for amenity areas and gardens.
- 8.14 Gardens sited away from Blainscough Lane and the adjacent industrial use demonstrate compliance with target noise levels without the need for mitigation.
- 8.15 The proposed development fully accords with the requirements of the NPPF, BS 8233: 2014 and BS 8233:1999 and will ensure that the amenity of residents will be promoted.

## **Air**

- 8.16 As required by the NPPF<sup>46</sup>, an Air Quality Assessment has been prepared by Ensafe Consultants. The report provides a review of existing air quality, and an assessment of

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<sup>45</sup> National Planning Policy Framework (2019) Para. 182

<sup>46</sup> National Planning Policy Framework (2019) Para. 181

the impact of the proposed development on air quality during construction and operational phases of the proposed development.

- 8.17 The assessment also sets out an analysis on the impact upon air quality through the construction phase of development. This confirms that with appropriate mitigation, the dust impacts from construction can be controlled and are assessed as not significant.
- 8.18 The proposed development is anticipated to result in additional vehicle flows marginally above 500 AADT flows on the local road network. The Assessment sets out the approach to screening thresholds under IAQM and EPUK guidance to conclude that the impact upon nearby sensitive receptors along the B5251 and A49 routes will not be significant.
- 8.19 Moreover, a review of CBC monitoring data within the local vicinity of the site, including Spendmore Lane, demonstrate that annual mean concentrations of NO<sub>2</sub> and PM<sub>10</sub> are significantly below air quality objectives since 2017. The site is therefore concluded as suitable for a proposed residential use.
- 8.20 The proposed development therefore accords with the provisions of the NPPF and the Core Strategy<sup>47</sup>.

### **Flood Risk and Drainage**

- 8.21 A Flood Risk Assessment has been prepared by Lees Roxborough in support of the application. The assessment identified the entirety of the site being located within Flood Zone 1 and is therefore at low risk of flooding.
- 8.22 There are no water bodies in the area which present a source of risk to the development, nor does the adjacent watercourse network present a source of risk to the area proposed for development.
- 8.23 Noting the nature of the site as undeveloped, greenfield land there is a need to ensure that development run off rates are limited to the existing run off rates.
- 8.24 Noting the ground conditions of the site, the Assessment concludes that infiltration will not be suitable in this case and therefore precludes the use of permeable paving or soakaways as part of a sustainable drainage strategy.
- 8.25 An outline drainage strategy has also been prepared which proposes to direct surface water to the east of the site by making use of topography and levels. This will provide

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<sup>47</sup> Central Lancashire Core Strategy (2012) Policy 30

opportunities for attenuation and making use of sustainable drainage methods to manage runoff rates, including scope to outfall into Tanyard Brook. While the detailed design will be confirmed at any reserved matters stage, the strategy will ensure that there will be no increase in residual flood risk for neighbouring areas and the surrounding sewer network.

- 8.26 Associated highways, dwellings and hard surfaces will be served by a piped surface water system will discharge into the basin and ensure that there will be no flooding up to the 1 in 30 year event.
- 8.27 Overall flows will be contained on site within the basin and supplemented by the piped system up to the 1 in 100 year event plus allowance for 30% climate, if and where appropriate, by setting of levels.
- 8.28 In relation to foul drainage, the outline strategy is to connect into the existing adopted sewer network with the Flood Risk Assessment identifying possible connections within the vicinity of the site. As these connections are outside the red line boundary of this application, third party approval will be required with discussions to follow with United Utilities.
- 8.29 In sum, the assessment confirms the site is at a low risk of flooding and as being suitable in securing a sustainable drainage solution to accommodate any proposed residential development of the site, the full details of which will accompany any reserved matters application and detailed design development.

## **Trees**

- 8.30 A Preliminary Arboricultural Impact Assessment has been undertaken by Christians Environmental for the application site. This confirms a Tree Preservation Order referenced: CBC TPO 3 (Coppull) 1984 is enforced in the woodland area located to the east of the application site, however this is outside of the red-line boundary. A desktop review and site survey identified no Tree Preservation Orders; no trees within a Conservation Area; no ancient woodland; no veteran trees; no trees within a Community Forest; and arboreal no Habitats of Principal Importance on the site itself.
- 8.31 The proposals, while in outline form, seek to retain and enhance the site's existing landscape features. This includes the mature tree cover and woodland that screens the site boundaries and will promote local amenity.
- 8.32 There are however no Category A trees or hedges within the development site itself, although further assessment on a detailed scheme should be undertaken at the

reserved matters stage to ascertain any potential incursion into root protection areas for those plots identified to the south and located adjacent to tree group G5.

- 8.33 In terms of facilitating pedestrian connectivity, the outline scheme identifies the potential for a footpath in the north east corner as an opportunity for enhanced accessibility along Blainscough Lane. While subject to the detail of a final scheme, this may involve the partial removal of trees contained within tree group G4. These are assessed as Category B trees of moderate quality.
- 8.34 The Impact Assessment identifies those Category B trees where root protection areas may be impacted due to plot layouts and surfacing proposals. The report confirms that a Method Statement will need to be submitted at the reserved matter stage to demonstrate appropriate mitigation and protection.
- 8.35 In order to facilitate access to plots in the south east corner of the site, two category C trees of low quality (T11 and T15) will require the partial removal of Category C hedgerow (H1). Other low quality hedgerow (H3 and H5) will also need removing based on the proposed outline layout.
- 8.36 The Illustrative Masterplan illustrates how a well-considered landscape plan and approach to on-site planting could support the loss of any limited removal of low to moderate quality trees and hedgerow as a result of the development.
- 8.37 The development is therefore in full accordance with the provisions of the NPPF and Core Strategy.

## **Ecology**

- 8.38 A Preliminary Ecological Appraisal has been prepared by Pennine Ecological to assess the ecological significance of the site in terms of protected species and habitats.

### Habitats

- 8.39 The Appraisal identified one record of the invasive Indian balsam located sporadically on the southern and norther boundary of the site as well as adjacent to existing hedgerow sections which transect the site. The report sets out measures to mitigate any risks during the construction phase.
- 8.40 Plant species across the site were typically of low quality or widespread to the local area and therefore offer just limited site value. The pond located on-site to the east

and further beyond outside the application boundary has identified potential to support amphibian species.

- 8.41 While hedgerow falls under Section 41 Habitats of Principal Importance in England (NERC) Act 2006, the sections of hedgerow found on-site are all of low quality and deemed to be species poor. This supports the conclusions of the Preliminary Arboricultural Impact Assessment.
- 8.42 The broad-leaved woodland, particularly along the stream corridor, is also a Lancashire BAP Habitat and should be retained and suitably buffered from development.

#### Protected Species

- 8.43 In terms of protected species, there is a record of Great Crested Newt (GCN) population 224m from site on the western side of Preston Road (A49). Given the nature of the A49 as a key route within the local highway network this is seen as a significant barrier to any GCN migrating to the application site. One small pond was however identified on-site with another pond located just 12m from the site boundary to the south east. Further surveys are recommended during the appropriate conditions (Mid-March to Mid-June) to establish the presence or absence of on-site GCN populations.
- 8.44 No badger setts were identified on-site, nor were there any signs of badger activity such as latrines and runs which suggests the site is not used for foraging or commuting purposes.
- 8.45 One tree (T8) located along the tree line and hedgerow transecting east across the site was assessed as offering bat roosting potential. Both existing hedgerows and extensive woodland alongside Tanyard Brook provides good quality foraging habitats for bats and will be retained by the scheme.
- 8.46 No evidence was found for otter and water vole activity associated with the Tanyard Brook and adjacent ponds. The surveys were limited to visually accessible lengths of the brook due to physical constraints such as impenetrable shrub and level changes, however given the retention of woodland and proposed ecological buffer zones to the brook corridor, the report confirms that no surveys are required.
- 8.47 Noting the extent of existing habitat features, the site is considered suitable for nesting and breeding birds and should therefore be appropriately inspected prior to any construction works in order to avoid impacts.

#### Summary

- 8.48 Overall, the Appraisal supports the proposed development of the site which will result in a limited impact to both fauna and flora species as well as seeking to retain higher quality habitat and secure biodiversity net gain through opportunities for ecological enhancement.
- 8.49 The development therefore delivers on the requirements of the NPPF and Core Strategy<sup>48</sup>.

## **Minerals**

- 8.50 Noting the site's location within a Mineral Safeguarding Area, more specifically for shallow coal and sandstone, a Mineral Resource Assessment has been prepared by Wardell Armstrong in support of the application.
- 8.51 The assessment identified the historic role of Blainscough Colliery, located just 1km from the application site, which may have already extracted coal from the local seams given its activity over 70 years in operation. If significant coal seams were identified under the site, the likelihood is this would have already been extracted.
- 8.52 Notwithstanding this, mining the site for coal or recovering sandstone would neither be practicable, nor possible due to the impact on residential properties adjoining the site and local environment.
- 8.53 The prospects for coal and sandstone being worked from the Pennine Lower Coal Measures Formation are concluded as unrealistic and therefore the site offers no economic value. Any siltstone and mudstone identified on the site would also not offer commercially viable minerals.
- 8.54 Taking account of the above, the assessment confirms that development of the site would be acceptable in the Mineral Safeguarding Area and is in accordance with the requirements of Policy M2 of the Joint Lancashire Minerals and Waste Local Plan.

## **Land Contamination**

- 8.55 A Phase 1 Geo-Environmental Desk Study Report prepared by REFA has been submitted in support of the application to ascertain if there is a potential contamination risk across the site.
- 8.56 An appraisal on the site's historic context has confirmed that the site has been utilised for agricultural purposes throughout its recorded history with no signs of development.

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<sup>48</sup> Central Lancashire Core Strategy (2012) Policy 22



Assessment of the surrounding area has indicated the presence of collieries to the north east and south east as well as the industrial estate located to the south east.

8.57 In the absence of any previous development on the site and its continued use for agricultural purposes, the likelihood of widespread soil contamination is projected to be very low. Potential sources of contamination have been identified and include:

- Naturally occurring elevated concentrations of contaminants within the topsoil and natural strata;
- Potential contaminants associated with waste treatment facility;
- Potential migrating ground gases generated from off-site features; and
- Migration of contamination from the industrial estate located to the south east.

8.58 While more intrusive investigations are recommended by the Phase 1 Report, the study identifies anticipated ground conditions and geo-technical hazards. Other than the potential of surface water retention and live services, all other potential risks are assessed as unlikely.

## **Energy**

8.59 An accompanying Energy Statement has been prepared by Briary Energy to support the application. The report demonstrates the energy efficiencies of the proposed development which has sought to make use of renewable energy technologies, improved thermal fabric efficiencies, air tightness and effective heating controls.

8.60 The report explores viable low to zero carbon technologies and confirms the scheme can achieve target carbon dioxide emission reductions through incorporating 97kWp Solar PVs and adopting a fabric first approach to improve efficiencies. Alternatively, the proposed dwellings could provide a waste water heat recovery system (e.g. Showersave QB1-21) with a total of 36kW of PV and additional fabric efficiency measures.

8.61 Good quality Solar PVs have a typical lifecycle of 25 years and therefore require low maintenance. Moreover, this combined approach will deliver key benefits in terms of improved thermal comfort levels and direct cost savings to residents.

8.62 In accordance with Policy 27 of the Central Lancashire Core Strategy, the proposed development represents a 19% reduction in carbon dioxide emissions set out under the current 2013 Building Regulations, illustrating the sustainability of the proposed scheme

and quality of design. As the report confirms, this also represents an 11.97% reduction in energy requirement of the site.

- 8.63 The development fully accords with the Core Strategy<sup>49</sup> and more specifically Paragraph 148 of the Framework which requires the planning system to '*help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions*'. The application achieves this and delivers on the Council's commitment to addressing the climate emergency.

## **Crime**

- 8.64 Lancashire Constabulary have reviewed the proposals and prepared a Crime Impact Statement which sets out key design principles and recommendations to inform the proposed development.
- 8.65 The Statement supports the principle of development and sets out further design recommendations. It is noted that the application is applied for in outline, and therefore several of the recommendations relating to detailed design (lighting, security, defensible spaces) will be fully considered at the reserved matters stage. Notwithstanding this the layout demonstrates how the design principles of ensuring good natural surveillance, through the orienting of buildings can be achieved. This is particularly important around public spaces such as areas of play and the public rights of way.
- 8.66 The Crime Impact Statement has been considered by the development proposals, and therefore demonstrates compliancy with the NPPF<sup>50</sup> and Core Strategy<sup>51</sup> in supporting safe and inclusive communities. Compliance against the Secured by Design Homes 2019 design guide should be taken into account at the reserved matters stage.

## **EIA Screening**

- 8.67 An EIA Screening Opinion Request has been prepared in support of this application, given the nature of the proposals which seek to develop a site of more than 5.0 hectares fell under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. Such projects only require an EIA if the development is likely to result in significant impacts due to its nature, size or location.

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<sup>49</sup> Central Lancashire Core Strategy (2012) Policy 27

<sup>50</sup> National Planning Policy Framework (2019) Para. 127

<sup>51</sup> Central Lancashire Core Strategy (2012) Policy 26

- 8.68 The EIA Screening Opinion confirms that there is no requirement for an Environmental Statement but acknowledges the Local Planning Authority's legal duty to screen the proposals.

## **9.0 Does the Proposal Represent Sustainable Development?**

- 9.1 Paragraph 10 of the NPPF states that at the heart of the NPPF is a 'presumption in favour of sustainable development'. This is the overarching principle against which all developments must be assessed.
- 9.2 The NPPF, at paragraph 8, provides the three objectives of sustainable development, an economic objective, a social objective and an environmental objective and it is considered that the proposed development contributes to each of these roles.

### **Social Role**

- 9.3 The development makes a significant contribution towards the social objectives of sustainable development. Primarily, the proposals will deliver housing to contribute towards the Borough's housing land supply which is currently in significant shortfall. More importantly, by bringing forward affordable housing into an area of acute need, the development will ensure that the needs of more of its residents can be met.
- 9.4 The development will deliver 30% on-site affordable housing provision, securing up to 37 new dwellings, of which a proportion will support those households on the Housing Register with a need for social housing in Coppull.
- 9.5 Recognising the growing affordability issues within the Borough (see Section 3.0 and 7.0) this provision will help to address this problem and reduce the shortfall in the supply of affordable housing across Chorley over the next 5 years.
- 9.6 The proposed scheme will therefore meet a clear and identified need within the Borough and it will do so in a highly sustainable location for public transport, amenities and employment.
- 9.7 The supporting Design and Access Statement also demonstrates the approach to achieving good design in order to promote the creation of a healthy, safe and inclusive community within Coppull.

### **Economic Role**

- 9.8 Adopted and emerging planning policy identifies Coppull as a highly sustainable settlement within Chorley, with existing infrastructure and facilities in the local area capable of accommodating the proposed development.

- 9.9 The development therefore presents an opportunity to provide growth in an appropriate location and address the balance in how this is directed across the Borough, by ensuring that development needs within the south of Chorley continue to be met. The scheme will also bring various economic benefits including; a boost to the local economy, provide new local jobs through the construction phase and increase council funds.
- 9.10 The proposals will therefore contribute to the growth objectives for Coppull and its overall vitality and viability. This will in turn increase spending power within the settlement and surrounding areas where there is also good accessibility and contribute to the long-term maintenance of services and facilities on offer.

### **Environmental Role**

- 9.11 The proposals are considered appropriate within the residential context and will not have a negative impact upon the surrounding area or environment. No technical constraints prevent this development coming forward as highlighted in Section 7.0.
- 9.12 The site has been fully assessed for its ecological and arboricultural value, confirming the proposals will not result in a significant impact. The scheme design adopts a sympathetic approach by retaining existing landscape features including hedgerow and woodland. Where relevant mitigation is to be provided with further opportunities for biodiversity net gains, demonstrating the applicant's commitment to conserving and enhancing the natural environment.
- 9.13 An Energy Statement has also been submitted which demonstrates how the proposal will aim to minimise waste and pollution, making use of low carbon technology within new dwellings where feasible to do so. The proposed 19% carbon dioxide emissions reductions against Part L Building Regulations 2013, fully supports the Council's active role in meeting the challenge of climate change.
- 9.14 Owing to the site's sustainable location within Coppull, which benefits from excellent connectivity to key destinations, amenities and services within the settlement and borough wide, the new homes will support the use of sustainable transport. The Illustrative Masterplan illustrates how opportunities for enhanced pedestrian and cyclist connectivity can be secured, with the retained public rights of way establishing a strong framework for the layout to be designed around.
- 9.15 It is demonstrated that the proposed development will contribute towards the sustainable development objectives set out in the NPPF (Para. 8).

## Planning Balance Assessment

- 9.16 In order to understand if a development is sustainable, it is necessary to consider the benefits of the development against the adverse impacts in the planning balance.
- 9.17 In terms of harm, it is accepted that the proposal will result in the development of safeguard land, which seeks to protect sites in order to meet future development needs and is therefore contrary to Policy BNE3 of the Development Plan.
- 9.18 The evidential basis underpinning Policy BNE3 has been found to be out of date, given its alignment to an out-of-date housing requirement established under RSS. This is at a time where emerging planning policy, which albeit can only be attributed limited weight, is promoting safeguarded land such as the application site to come forward for development in the short term from 2021. A further material factor which reduces the weight given to Policy BNE3 is the fact that safeguarded land is not explicitly identified under Footnote 6 of Paragraph 11(d) as a specific policy indicating that development should be restricted.
- 9.19 As set out in Section 3.0 and 7.0 of this Planning Statement, the most important policies for determining this application, which include Policy BNE3, are deemed to be out-of-date in their own right and when considering the Council's inability to demonstrate a deliverable five year supply of housing land.
- 9.20 Under paragraph 11(d) the 'titled balance' is therefore engaged for this decision requiring planning permission to be granted unless:
- 'i) the policies of the Framework that protect areas or assets of particular importance, as defined in Footnote 6, provide a clear reason for refusing the development proposed; or,*
- ii) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole.'*
- 9.21 Table 5 below sets out the key benefits of the proposals which can be summarised as follows:

Factor	Evidence	Consideration
<b>Housing Delivery</b>	Planning Statement Section 3.0 and 7.0, demonstrates that the important contribution	Positive

	the proposed 123 dwellings will make to addressing the shortfall in housing across Chorley on a draft allocated site proposed under emerging planning policy.	
<b>Affordable Housing</b>	The proposed development will secure a 30% on-site provision and provide a valuable contribution towards affordable housing and local needs (see Sections 3.0 and 7.0).	Positive
<b>High Quality Dwellings</b>	The Design and Access Statement provides a framework to show how high quality development can be secured to provide a more contemporary and attractive product to the local housing offer.	Positive
<b>Provision of Open Space and Children's Play</b>	The Planning Statement Section 4.0 explains how the proposed development will secure up to 0.81ha of open space provision across the site with identified opportunities for children's play. This level of provision is significant over and above Local Plan Policy HS4A requirements.	Positive
<b>Environmental Enhancements</b>	The proposals will have a limited impact on the ecological value of the site, which has been assessed in Section 8.0 as not being high. Although the proposal would provide a more urbanising effect for this greenfield site, it would also provide opportunities to retain, manage and enhance existing habitats of value and introduce new habitats for nature conservation, as part of the landscaping, open space and sustainable drainage proposals for the site.	Positive
<b>Supporting Job Creation and Local Growth</b>	Development of the site will support local job creation through the construction phase and bring about a boost to local spending and household expenditure on services and amenities within Coppull which is recognised as a sustainable, growth settlement. This will further promote the vitality and viability of the area.	Positive

Table 5: Summary of Development Benefits

- 9.22 The accompanying suite of technical reports demonstrate that there are no constraints to development that cannot be reasonably mitigated through planning conditions and obligations (see Draft Heads of Terms under Section 10.0).
- 9.23 In the absence of any other adverse impacts or material considerations, the proposed scheme represents sustainable development with the significant benefits arising from the proposal demonstrably outweighing any identified harm.
- 9.24 In considering the planning balance of the proposal, the Council has a strong case to state that the substantial benefits arising from the development, in particular the provision of new, high quality homes within a Borough of identified need, outweigh the negative aspects, when assessed against the policies in the NPPF as a whole. The Council can therefore approve the application in accordance with paragraph 11 of the NPPF.



## **10.0 S106 Heads of Terms**

- 10.1 Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 as amended (CILR) provides that:

*'A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –*

*Necessary to make the development acceptable in planning terms; Directly related to the development; and*

*Fairly and reasonably related in scale and kind to the development.'*

- 10.2 These tests are reflected at paragraph 56 of the Revised NPPF (2019).

- 10.3 In considering the use of developer contributions, Planning Practice Guidance paragraph 092 (ID 25-092-20140612) sets out that:

*'Local authorities should ensure that the combined total impact of such requests does not threaten the viability of the sites and scale of development identified in the development plan (see paragraph 173 of the National Planning Policy Framework for details).*

*Where the levy is in place for an area, charging authorities should work proactively with developers to ensure they are clear about the authorities' infrastructure needs and what developers will be expected to pay for through which route. There should be no actual or perceived 'double dipping' with developers paying twice for the same item of infrastructure.'*

- 10.4 The applicant seeks to enter into dialogue with Chorley Borough Council to agree any Section 106 obligations which meet the requisite legal tests set out above and are not covered by the Council's adopted CIL Charging Schedule (2013).

- 10.5 The following draft Heads of Terms are proposed:

### **Affordable Housing**

- 10.6 This scheme would deliver 30% affordable housing (37 dwellings) on-site, with the precise mix of tenures still subject to confirmation. This level of provision is in full accordance with Central Lancashire Core Strategy Policy 7 and represents a valuable contribution towards meeting local housing needs.

10.7 The precise tenure split is to be agreed with the local authority.

### **Open Space**

10.8 The Agreement will require the Developer to provide on-site informal open space and areas of natural play.

10.9 Appropriate phasing requirements will be specified together with the requirement to agree with the Council an appropriate scheme for the long term maintenance and management of these areas, if these are not to be retained under private ownership.

### **Other**

10.10 Further contributions may be identified through the planning process, and subject to meeting the proper legal tests of Regulation 122, consideration will be duly given to their inclusion.

## 11.0 Conclusions

- 11.1 This Planning Statement is prepared on behalf of Lea Hough to support the proposed development of 123no. residential dwellings on Land at Blainscough Hall, Coppull.
- 11.2 Set in the context of the national and local housing crisis, this proposed development is being brought forward as a timely opportunity to boost delivery and meet local needs.
- 11.3 This provision is all the more significant when considering the current economic climate which, as a result, means that the future delivery of both open market and affordable housing in Chorley is highly uncertain. In such circumstances, the Council should be looking to build market confidence and be proactively addressing the significant shortfall in housing and growing issues on affordability.
- 11.4 The site has been explicitly safeguarded over the plan period till such time that its release is required to meet development needs, which is precisely the backdrop for the proposed outline planning application. More specifically, the application proposes the development of a site explicitly earmarked by the Council as one of the next logical sites for residential development, capable of meeting needs from 2021 onwards.
- 11.5 This Statement demonstrates how the proposed housing is being brought forward in the right location and at the right time for the local area of Coppull and the Borough as a whole. Sustainable housing development such as this carries with it significant weight as emphasised under the national planning policy.
- 11.6 This Planning Statement, along with the suite of technical reports that accompany this application, demonstrates in the planning balance there is no demonstrable or significant harm arising from the development that would outweigh its benefits. Moreover, the site benefits from a sustainable location with no technical reasons preventing the proposals from being realised.
- 11.7 In sum, it is evident that there are no significant and demonstrable adverse impacts or material considerations that would outweigh the benefits of granting permission when assessed against the NPPF and development plan as a whole. The proposals constitute sustainable development and should therefore be approved 'without delay'.

## **Appendix 1 – Public Consultation Leaflet**

## Have Your Say

Your views are important to us ahead of the submission of this outline planning application. Our public consultation is underway, and you can share your thoughts about our commitment to delivering a high quality neighbourhood by emailing to the following address.

All feedback received will be logged and reviewed to help shape the final plans before an application is submitted to Chorley Council. All comments should be received no later than Friday 4<sup>th</sup> December 2020 to ensure they can be taken into consideration before the final plans are submitted to the Council.

We look forward to hearing from you.



### EMAIL

Send an email to:  
[yourviews@njlconsulting.co.uk](mailto:yourviews@njlconsulting.co.uk)

including 'Blainscough Lane' in the  
subject line



Delivering high quality new homes at land off

**Blainscough Lane, Coppull**

## PUBLIC CONSULTATION



**Outline proposals are being prepared for a development of up to 120 dwellings on land at Blainscough Lane in Coppull. The first stage in bringing forward the site for development is the submission of an outline planning application to Chorley Council but before we do this, we want to inform local people about the proposals. More information about this can be found overleaf.**

The development team are currently undergoing the design and technical review process, and we now want to inform local people about the proposals and provide you with an early opportunity to consider them.

The application that is being submitted to Chorley Council is an outline planning application. For this type of application, the key issue that the Council will be considering whether they think that the site is suitable for the use being proposed.



## The Story So Far

The site totals 5.51ha and is currently designated as Safeguarded Land.

Recently in November 2019, Chorley Council (alongside other authorities) approved the publication of the Central Lancashire Local Plan: Issues & Options Consultation which identified the site as a suitable housing allocation in the emerging local plan.

## Application Submission

A series of technical reports are being prepared as part of the planning application process. These ensure that the proposed development can be built safely in this location without causing harm to local area. These reports cover a range of topics, including air quality, noise, ecology, traffic impact and drainage.

All of these reports will be made publicly available for you to view through the Council's website once the planning application has been submitted.

## Your Views

What do you think about our proposals?

Do you have any thoughts about how this outline application is delivered?

To find out more about how to submit your views, please take a look at the back page of this leaflet.

## Delivering a High Quality Development

The design team are committed to securing the framework for a high quality proposal. The final details are not considered under this outline planning application, however key elements proposed will include:

- **Up to 120 new homes** to meet local housing needs;
- **30% provision of affordable homes** across a mix of tenures to support people onto the housing ladder;
- **Sensitive and well-designed spaces** that reflect the commitment to high quality development;
- **Extensive provision of public open space** across the site including natural areas of play and trim trails;
- **Retained and enhanced green infrastructure** including existing woodland features and proposals for a central linear park;
- **Indicative access proposed from Grange Drive** to provide a looped spine road into the development;
- **Opportunities for sustainable drainage and biodiversity enhancement** through attenuation features, additional planting, and provision of ecological buffer zones.
- **Pedestrian and cycle networks** which retain existing rights of way and connect to the wider area, providing sustainable means of access to nearby facilities; and
- **Economic benefits for the local community** through the additional spend of new residents in local shops and on services to help sustain jobs and business.



