

STATEMENT OF CASE

LAND AT GARSTANG ROAD, BROUGHTON

OCTOBER 2023

Signing off Sheet

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Project: Land west of Garstang Road, Broughton
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1. Executive Summary

- 1.1 This Statement of Case ('SoC') supports an appeal against Preston City Council's decision to refuse outline planning permission for development of up to 51 dwellings with associated works on land west of Garstang Road, Broughton (application ref 06/2023/0030). The bespoke application includes commitments to the provision of 40% affordable housing, above the policy requirement of 35%, 10% of properties reserved for over 55's residents, larger properties for BAME households, and accessible/adaptable homes, meeting the specific needs of Broughton and the wider borough to respond to the latest evidence published by the Council.
- 1.2 It is clear that with the introduction of the new bypass, improvements to services and facilities, along with the close proximity to Preston (with reliable and frequent public transport infrastructure towards to the city from the settlement), it represents a sustainable settlement to deliver new housing in the years to come for the Council.
- 1.3 In the determination of the application the Council have fully consulted with statutory and non-statutory bodies on all relevant technical matters. At the point of determination, there were no statutory consultee objections on these grounds.
- 1.4 The Council cited a single reason for refusal on the decision notice – that the proposal does not accord with the spatial strategy in the development plan and is outside the settlement boundary as set out in Policy 1 of the Central Lancashire Core Strategy, EN1 of the Preston Local Plan and RES1 of the Broughton Neighbourhood Plan. The Council does not allege any specific land use planning harms beyond these policy conflicts.
- 1.5 This appeal therefore turns on whether this unique proposal accords with the development plan as a whole, the interpretation and application of the most relevant development plan policies, the importance of other material considerations including the NPPF, and the specific factors and circumstantial evidence regarding the appeal site and the particular development proposals.

The Development Plan

- 1.6 The Development Plan comprises the following documents:
- Central Lancashire Core Strategy (July 2012)
 - The Preston Local Plan (Site Allocations and Development Management DPD) (July 2015)
 - Broughton-in-Amounderness Neighbourhood Plan (August 2018)
- 1.7 The appeal proposals accord with the development plan as a whole in the first instance. A full policy matrix is provided across strategic and development management policies exemplifying the Appellant's case on this point (**Appendix 7**). The proposals fully accord with a whole range of development plan policies. There are policies within the development plan that pull in different directions. As the courts have made clear, a proposal can accord with the development plan as a whole, even if

there are conflicts with some specific policies. It is for the decision maker to determine in this context whether this unique proposal accords with the plan as a whole.

- 1.8 It is clear the proposals perform strongly against the development plan as a whole, and against the policies in the NPPF. This is entirely expected given it is not contentious that that the proposals represent sustainable development¹ and there are no technical grounds of objection to the proposals.
- 1.9 The proposals align positively with all of the Strategic Objectives of the Core Strategy (SO1-SO24).
- 1.10 The Council have cited three policies in refusing planning permission in this instance – CLCS Policy 1, PLP Policy EN1 and BNDP Policy RES1. These are considered the most relevant development plan policies in relation to the principle of the proposals in terms of scale and development type adjacent to the Broughton settlement boundary.
- 1.11 Policy 1 sets out the way in which growth is intended to be directed within Central Lancashire. The policy provides a settlement / area hierarchy identifying targets for how the overall housing development in the sub regional area is to be targeted and apportioned. The settlement of Broughton falls into the bottom tier – however, as set out above, the Council agrees² that Broughton is a sustainable location for development and that more development will be allocated to it as set out in the evidence base to the emerging local plan.
- 1.12 Policy 1 is deliberately drafted to allow for flexibility to deal with changing circumstances – see Policy 1 supporting text paragraph 5.55 as well as paragraph 1.6-1.8 of the introduction to the Core Strategy. The flexibility achieved is to reflect the reality that *“housing figures are minimum requirements, net of demolitions, that they are not absolute targets and may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies* (CLCS Inspectors Report, Paragraph 32 – **Appendix 11**).
- 1.13 Policy 1 states that development in smaller villages such as Broughton will ‘typically be small scale’. The policy does not say that all development which is not small scale should be refused. The policy allows for exceptional reasons to justify larger scale redevelopment schemes - such reasons are undefined. It is our case that the proposals do not conflict with Policy 1 because there are material considerations to grant consent for this development in Broughton.
- 1.14 We consider there to be compelling exceptional reasons supporting the proposals in this instance. Our evidence identifies the lack of developmental harm or impact to services, the physical characteristics of the site in relation to wider development in south Broughton, the sustainable nature of the proposals and the benefits of the proposals in meeting defined needs. It is common ground that the site is well-contained and any adverse visual and landscape impacts are fully mitigated.
- 1.15 It is also of importance that Broughton has been capable of absorbing housing outside of the settlement boundary, in particular the last 5 years through a number of allowed

¹ Although the Council alleges the location is not suitable for housing.

² By inference of the level of growth proposed by the Council in the emerging Local Plan.

appeals, and the Council's own evidence is that more will be allocated in the emerging local plan. This is entirely unsurprising given Broughton's location close to the city, its services and unparalleled sustainable transport connections to Preston and other employment sites i.e. a highly sustainable location where growth should be directed. This aligns with the aims of both national planning policy (NPPF Paragraphs 105 and 110 which promote growth in highly sustainable locations that in turn reduces car dependence etc); regional policy (CLCS Policy 3 regarding improved transport in Broughton); and local planning policy (PLP Policy IN2 regarding the importance of the Broughton bypass to deliver the New Deal housing; and Policy IN3 delivering the park and ride facilities).

- 1.16 We acknowledge a limited conflict with Policy EN1 and Policy RES1. Those policies seek to restrict development to specific types outside of settlement boundaries and in the open countryside. The policies, if applied with full weight in this case, do not sit with Policy 1 without tension as they do not allow for any of the exceptions to 'typical' development types as permitted by Policy 1. This in our view limits the weight that can be attached to the perceived conflict of EN1 and RES1 as the proposals which seek to meet newly arising housing needs which accord with Policy 1 and AD1 would also be pulled in an opposite direction to accord with EN1 and RES1. In effect, development such as the appeal scheme that complies with the overarching spatial strategy in Policy 1 would be blocked by policies which conflict with the strategic aims of flexibility.
- 1.17 Policy EN1 has been overtaken by significant events since the policy was conceived over a decade ago. This includes significant development outside of settlement boundaries (irrespective of the land supply position), public infrastructure improvements to Broughton, the completion of the Broughton bypass, completion of Junction 1 of the M55, enhancements to cycleways and the opening of a new Co-op convenience store, cafes and restaurants. Policy 1 recognises the need to deal with changing circumstances.
- 1.18 The neighbourhood plan explicitly recognises that *"there is an acceptance that the opportunities to the housing stock within the defined settlement are modest and some additional scope for development close to the village could assist in meeting local housing needs, in supporting development of community facilities and activity, and in rebalancing a local community that is skewed towards the middle aged and elderly"*³. In addition, a wide range of policies in NPPF supports the sustainability credentials of the appeal proposals.
- 1.19 We consider the benefits of the proposals to be significant and diverse. A point agreed with the Council. There has been no other scheme determined in the LPA area, or indeed in Broughton, which proposes the range of housing needs and other benefits brought by these proposals – this makes the proposals unique and responsive to new evidence. As the specific type and tenure of housing needs has only recently emerged, and could not have been identified in the development plan, Preston is not (and could not) meet these needs. The proposals should not be frustrated or delayed as a result of such limited scope of policy conflict where there is compliance with the development plan as a whole. Indeed, the Council may seek to argue that conflict with any development plan policy intention is clearly a form of harm within a genuinely

³ Para 8.3.5, Broughton Neighbourhood Plan

plan-led system. However, equally, a failure of an existing plan to meet newly identified housing needs (affordable, older people's, BAME and adaptable homes) in a sustainable location would also undermine public confidence in the plan-led system. Harm by not fulfilling opportunities to create sustainable development to respond to an identified real need is in itself a relevant harm associated with a decision not to allow planning permission.

- 1.20 In conclusion we have followed the process required by NPPF paragraph 12 that the development plan is the starting point for decision making. It is our primary case that the development accords with the development plan as a whole and so planning permission should be granted. The proposals are informed by the latest evidence published by the Council and, coupled with the sustainable location of the site, represents good planning.
- 1.21 Alternatively, in the planning balance we do not consider the very limited weight to conflict with specific policies within the development plan outweigh the immediate benefit of delivering sustainable development, in a sustainable location, and accruing significant environmental, economic and social benefits and accordingly planning permission should be granted. This approach is not in any way a new or novel feature of planning decisions; material considerations (as here, substantial public benefits) can outweigh conflict with a development plan.
- 1.22 In the event the Inspector concludes that the proposals do conflict with the development plan as a whole, we consider that there are a range of other policies that support the proposals and there are material considerations of substantial weight in this particular case that indicate the plan should not be followed in accordance with NPPF paragraph 12.

2. Introduction

2.1 This Statement of Case is submitted on behalf of Hollins Strategic Land (hereafter referred to as 'the Appellant' or 'HSL') in respect of an appeal pursuant to Section 78 of the Town and Country Planning Act 1990 against Preston City Council's (hereafter referred to as 'PCC' or 'the Council') decision to refuse an Outline Planning Application ('OPA') for a residential development on land to the west of Garstang Road, Broughton.

2.2 The OPA (Reference: 06/2023/0030) was submitted via the Planning Portal on 5th January 2023, and released to PCC on 6th January 2023. The application was made valid by PCC on the 6th January 2023. The assigned description of development was as follows:

"Outline Planning Application seeking approval for access only for residential development for up to 51no. dwellings with associated works (all other matters reserved)"

2.3 The OPA was refused on 4th April 2023. A sole Reason for Refusal ('RfR') was cited within the decision notice (**Appendix 1**) issued by PCC as follows:

1. The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan

2.4 The OPA sought permission for the principle of development. All matters are reserved save for access. Access means the points of access and not the internal road layout, which will be addressed at reserved matters stage, should the Planning Inspectorate (hereafter referred to as 'PINS') allow the appeal.

3. Site and Surroundings

The Site

- 3.1 The site comprises a greenfield site located on the western side of Garstang Road in the settlement of Broughton, Preston. The submitted Site Location Plan can be found at **Appendix 2**.
- 3.2 To the north, the site is bound by built development of Broughton. To the south of the site is the access road to Bank Hall and Bank Hall Farm. This farm comprises three barns now converted into dwellings. Further south, is the Lancashire and Cumbria ambulance headquarters.
- 3.3 Further south of the site is the M55 which bisects the land between Broughton (to the North) and the wider Preston urban area to the South. The M55 provides a physical barrier between the two settlements.
- 3.4 The site has frontage along the whole of the eastern boundary onto Garstang Road. The proposed site access is also taken from Garstang Road. Opposite the site on Garstang Road is a recently consented development scheme which is under construction for 130 dwellings.
- 3.5 The western boundary would adjoin the recently consented development scheme at Sandy Gate Lane which is under construction for 97 dwellings. A full overview of this application is provided later in this statement.
- 3.6 The Guild Wheel, a designated cycle route, runs along the eastern boundary of the site and part of the northern boundary. The Guild Wheel is a circa. 21-mile long safe cycling and walking route, running between Preston and Broughton, offering designated routes to cyclists to explore the wider area whilst also providing opportunities to connect to jobs, services, facilities and leisure.
- 3.7 A number of Public Rights of Way (PROWs) run around the vicinity of the site. These provide good permeability and access to the surrounding settlements, as well as providing accessibility to the open countryside beyond the wider vicinity of the site.
- 3.8 The site benefits from a relatively flat topography and is located within Flood Zone 1 and is therefore considered to be at the lowest risk of flooding.
- 3.9 The site is not located in a Conservation Area, nor does it contain any listed features. A number of listed buildings exist near the site. Bank Hall and Bank Hall Farm are Grade II listed. Other listed buildings include the Amounderness War Memorial, which is located close to the junction of Garstang Road and the access to Bank Hall.

The Surrounding Built Form

- 3.10 Broughton is a village in the borough of Preston with a parish area population of circa. 2,466 people (Census 2021). The 2011 Census recorded a parish population of 1,722 people. Local built form comprises predominantly residential in the form of single and two storey properties.

- 3.11 A range of local amenities exist within walking distance including schools (both primary and secondary), convenience shops, restaurants, cafes and pubs.
- 3.12 A number of development proposals have recently been allowed at appeal within Broughton which are discussed in further detail in this statement. These are material considerations of significant weight and demonstrate that Broughton is a sustainable location for growth which is recognised by the NPPF (specifically para. 105 of the NPPF which states that significant development should be focused on locations which are or can be made sustainable).

Strategic Policy Designations

- 3.13 The application site is designated as 'open countryside' under Policy EN1 of the Preston Local Plan and is included as an Area of Separation as outlined by Policy EN4 of the Local Plan.

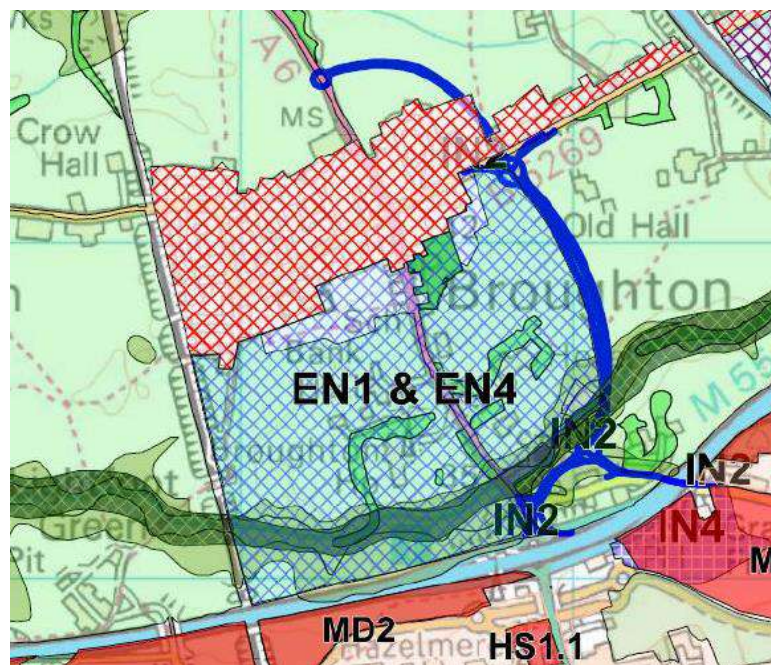


Figure 1 - Plan showing designations of EN1 and EN4

4. Planning History

The Site

06/2021/1104

- 4.1 Outline Planning Permission (all matters reserved except for access) was sought in respect of the site for the following:

“Outline Planning Application seeking approval for access only for residential development for up to 51no. dwellings with associated works (all other matters reserved)”

- 4.2 The OPA was refused on 6th January 2022. The first OPA sought planning permission for the same description of development as the second OPA (subject to this appeal process), albeit with an alternative type and tenure of housing. The sole RfR was as follows:

1. *The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focusing growth and investment at urban, brownfield and allocated sites within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood Development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.*

- 4.3 The following key items were established as acceptable in principle and set out within the Officer's Report (**Appendix 3**) relating to the refused OPA:

1. The proposal would have no impact on the strategic area of separation.
2. The proposals would not harm the surrounding landscape character.
3. There would be no harm to heritage assets arising from the proposals.
4. The surrounding highways network has capacity to accommodate the proposals and the proposed access arrangements are acceptable in principle.
5. The landscaping scheme would promote sufficient buffer zones and offsetting to protect the surrounding landscape areas.

6. A biodiversity net gain of over 33% could be achieved on site.

06/2021/1104 - Application Consultation

4.4 Through the determination of the application, the application was fully consulted upon, with a wide range of issues agreed with PCC and other statutory consultees. For clarity, these are summarised in the table below:

Consultee	Comment	Agreed with PCC
United Utilities	No objection subject to appropriate conditions to control surface water management	Y
Natural England	No objection	Y
County Highways	Initially raised objections given the concern around the safe and suitable access to the site. However, this was addressed through the submission of further information. On the basis of the amended details submitted through the course of the application, County Highways raised no objections subject to appropriate conditions being applied to any decision.	Y
Highways England	No objection subject to a condition requiring a travel plan.	Y
County Education	No objection subject to a S106 obligation to secure funding for additional school places.	Y
Greater Manchester Ecology Unit	No objection subject to conditions relating to tree protection measures, external lighting, vegetation clearance (and timing of this), and Amphibian Reasonable Avoidance Measures as well as submission of biodiversity enhancement measures.	Y
Environmental Health	No objection subject to following the recommendations of the Phase 1 Desk Study Assessment and the undertaking of a Phase 2 Geo-Environmental Site Investigation.	Y
Parks and Horticulture Service (landscape)	The landscape team suggested that a number of objectives should be achieved:	Y

	<ul style="list-style-type: none"> • Respecting the setting of the listed buildings to the south of the site • Delivering significant biodiversity enhancements • Providing public open space • Accommodating sustainable urban drainage • Retention of existing trees and hedgerows on all boundaries (other than those affected by access) • Providing connection to the Guild Wheel <p>They suggested that the rural edge/leafy character of Broughton should be protected by widening the existing green frontage of the site, which would also respect the setting of the heritage assets.</p> <p>The open space should also separate the site from existing buildings.</p> <p>The open space consultees raised no objections to the proposed development. furthermore, the LPA did not cite an impact on the Area of Separation as a reason for refusal concluding that the scheme as previously submitted resulted in no/limited harm to the countryside and landscape.</p>	
Waste Management	No objection subject to collection agreements and a Waste Management Plan	Y

Table 1 - 06/2021/1104 Statutory Consultee Responses

4.5 In addition to the statutory comments outlined above, a number of comments were made by residents and other stakeholders. These are summarised below:

Consultee	Comment
Broughton Parish Council	<p>Object to the development on the following grounds:</p> <ul style="list-style-type: none"> • The site is not designated in the Broughton Neighbourhood Plan; • The site is within the current “area of separation” – an area that Preston City Council have submitted for the revised Central Lancashire Core Strategy to be retained; • The site crosses the Guild Wheel/Garstang Road cycle track;

	<ul style="list-style-type: none"> • The proposed development will add traffic to Garstang Road that was narrowed and had a 20mph speed limit (currently unenforceable) when the bypass was built. The village centre has major parking issues already, and this will only exacerbate the issues; • The site is open countryside; • The adjoining sites off Sandy Gate Lane and opposite on Keyfold Farm were only granted planning permission on appeal as Preston City Council could not demonstrate a 5 year land supply – which they now can.
Right Honourable Ben Wallace MP	<ul style="list-style-type: none"> • The site is contrary to the Local Plan and the Broughton Neighbourhood Plan; • The site is not allocated for development; • The site is within the open countryside and Area of Separation; and • The open countryside/Area of Separation designation is important to ensuring the character of the village is maintained and not subsumed within north Preston.
Neighbour Comments	<p>In total 10 objections were received, which commented on the following items:</p> <ul style="list-style-type: none"> • Proposal is contrary to the Broughton Local Plan • Development would remove the last open space between Broughton and Fulwood • No more need for housing in Broughton • Loss of hedgerows and subsequent wildlife • Impact on highway safety • Impact on nearby heritage assets • The proposals fail to take into account the drainage culvert on the site • Detrimental impact on visual amenity • Lack of amenities within the village to cater for more residents

Table 2 - 06/2021/1104 Public and Stakeholder Consultation Responses

4.6 In reporting the application to planning committee, the case officer's assessment made the following observations and statements:

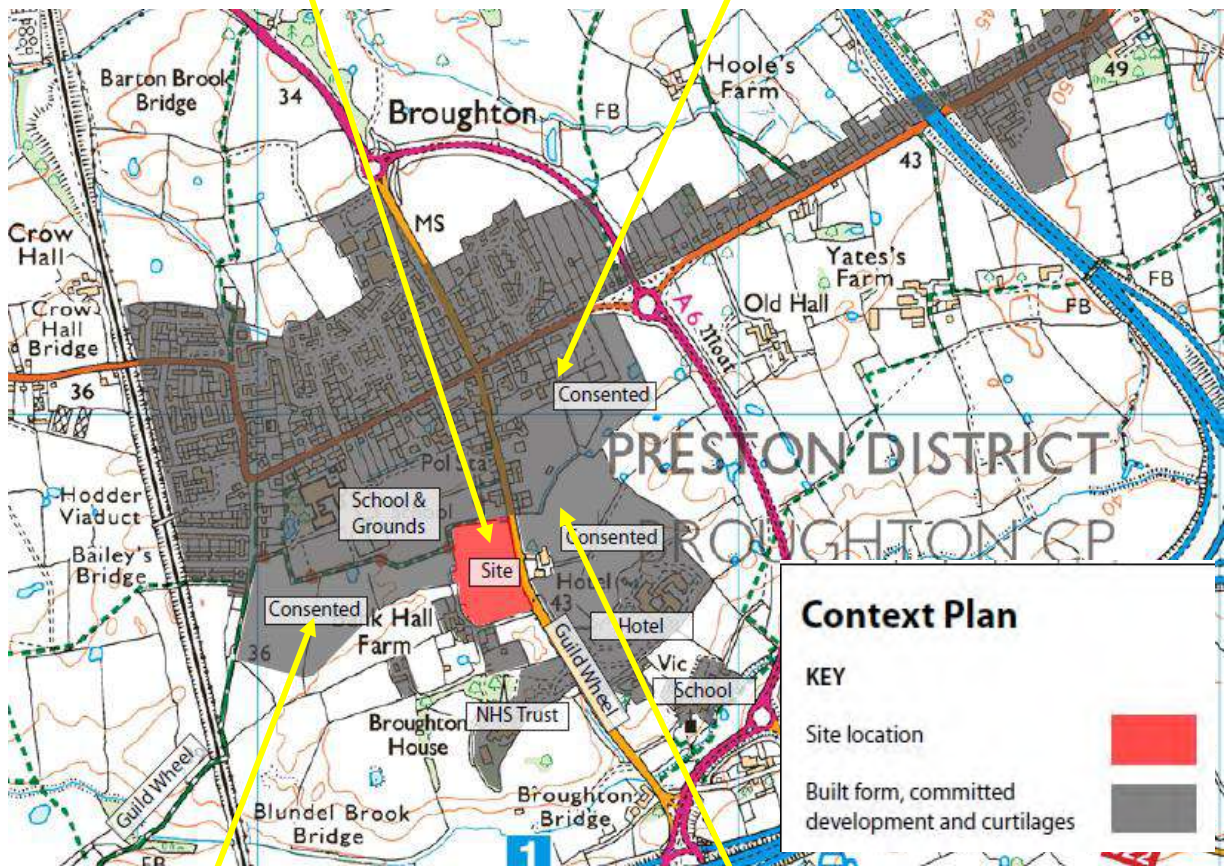
- In their view, the location of the development would not be in line with the spatial strategy set out in the Central Lancashire Plan.
- The proposed development would not have any impact on the Area of Separation.
- The open space proposed in the southern part of the site would successfully separate the site from existing buildings and the features within the public open space. This would complement the existing facilities on King George V playing fields to the north east of the site.
- The site is well contained visually so the proposals would not have any undue impact visually on the surrounding landscape. In this instance, the harm would be mitigated by the site-specific conditions and mitigation is proposed. Therefore, the proposals do not conflict with Policy 13 of the Core Strategy and Policy 21 of the Neighbourhood Plan.
- The parameters plan which was submitted through the application process confirmed that the development would not impact upon the setting of the surrounding listed buildings.
- Residential development has commenced at Key Fold Farm meaning that the site context is characterised by residential development.
- The proposed development would meet the policy requirements for affordable housing (35%). The type and tenure would be secured via a S106 agreement. The officer confirmed that this complied with the Affordable Housing SPD and the Core Strategy Policy 7.
- The proposal would provide 51 dwellings. Officers concluded that this was an appropriate development quantum for the site and agreed that the detailed design points could be agreed through a RM application.
- The application provides sufficient open space in line with Policy H3 of the Local Plan and Policy 17 of the Core Strategy.
- The application site is located a sufficient distance from any neighbouring properties to prevent unacceptable harm in terms of amenity.
- The proposed landscaping and open space would provide a sufficient off set to avoid any impact to dwellings located at the south west of the application site.
- Safe and effective access can be achieved into the site using a new access point on Garstang Road.

Local Area

4.7 A number of recent planning decisions within and around the settlement of Broughton are of relevance to the determination of this appeal. **Figure 2** below shows the location of these schemes, with detail against these sites provided in the following text.

Application Site: Land west of Garstang Road, Broughton, Preston, PR3 5JA

Land off Whittingham Lane and James Towers Way, Preston, Broughton, PR3 5JB



Land off Sandy Gate Lane Broughton Preston

Key Fold Farm, 430, Garstang Road, Preston, PR3 5JB

Figure 2 - Map showing location of relevant planning decisions in vicinity of appeal site

Land off Whittingham Lane and James Towers Way, Broughton

- 4.8 Outline Planning Application (all matters reserved except for access) for residential development of up to 81no. dwellings with associated works (Reference: 06/2021/0423). Application refused at Committee on 5th October 2021 citing the following reasons for refusal.

1. The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), albeit part of the site is allocated for development in the Broughton Neighbourhood Development Plan. The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood Development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.

2. The proposed development as submitted fails to demonstrate a junction design that can integrate into the existing network and operate safely and be considered a suitable means of access for both pedestrians and vehicles. As such, the proposal would lead to an unacceptable impact on highway safety, contrary to Policy 3 of the Central Lancashire Core Strategy, Policy ST2 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and the National Planning Policy Framework.

- 4.9 Full Planning Application for 44no. dwellings and associated works (Reference: 06/2022/0018). Resolution to grant Full Planning Permission at Planning Committee on 7th July 2022 subject to completion of S106 legal agreement.

Land off Sandy Gate Lane, Broughton

- 4.10 Outline Planning Application (all matters reserved except for access) for residential development for up to 97no. dwellings (Reference: 06/2016/0736). Application refused at committee on 2nd May 2017.
- 4.11 Appeal submitted and allowed under PINS reference APP/N2345/W/17/3179105 on 3rd April 2018 (**Appendix 4**).
- 4.12 Subsequent reserved matters submitted under reference 06/2019/0974 for approval of scale, layout, landscaping and appearance. Reserved matters approved on 14th November 2022 and the development is under construction.

Key Fold Farm, Broughton

- 4.13 Outline Planning Application (all matters reserved except for access) for residential development for up to 130 houses (reference 06/2017/0097). Application refused at Committee on 20th June 2017 citing the following reason for refusal:

1. The proposed development would be contrary to the hierarchy of locations for focusing growth and investment at urban, brownfield and allocated sites and lead to an unplanned and inappropriate expansion of a rural village which by reason of its low accessibility to local employment areas, shops and services, would fail to achieve the social and environmental dimensions of sustainable development. The proposal would therefore fail to focus development at an appropriate location contrary to Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) (2015) and the National Planning Policy Framework

- 4.14 Appeal allowed under PINS reference APP/N2345/W/17/3179177 on 3rd April 2018 (**Appendix 5**).
- 4.15 Subsequent reserved matters application submitted under reference 06/2019/0040 for approval of scale, layout, landscaping and appearance. Reserved matters approved on 8th October 2019.

Kingsway Nurseries, Newsham Hall Lane

- 4.16 Full Planning Application for residential development for up to 9 dwellings (reference 06/2018/1091). The site is outside of the settlement boundary of Broughton Village and identified as 'Open Countryside'. The delegated officer report confirmed the principle of development was not justified when judged solely against Local Plan Policy EN1 and Core Strategy Policy 1(f). The officer report confirmed that the acceptability of the proposed development is to be considered against the individual material considerations of the proposal and the Development Plan as a whole and recommended approval.
- 4.17 It is clear that had EN1 been applied with full force by the Council, sustainable development would not have been forthcoming.

Land at Bartle, Preston

- 4.18 Outline Planning Application for up to 1,100 dwellings (reference: 06/2020/0888). The site is defined as open countryside and in an area where development is expected to be typically small scale. The application was approved on 5th August 2021 in the context of the Council being able to demonstrate a five-year housing supply of 13.6 years using the Standard Method, so the tilted balance was not engaged. This is despite the officer report confirming conflicts with Core Strategy Policy 1 and EN1 which were given significant weight and objections from neighbouring authorities based on significant visual harm to the rural landscape. The material considerations that weighed in favour of the application included the provision of more homes.
- 4.19 It is clear that had EN1 been applied with full force by the Council, sustainable development would not have been forthcoming.

D'Urton Lane, Preston

- 4.20 Full application for a new build mosque, with ancillary features including parking facilities and access works from the existing track off D'Urton Lane (reference: 06/2021/0431). The site lies outside of the settlement boundary of Broughton. The application was recommended for approval to PCC's Planning Committee, with the committee resolving to grant planning permission in line with the recommendation on 3rd February 2022.
- 4.21 On 5th April 2022 the application was called in for decision by the Secretary of State with a local inquiry held to discuss the key issues. In the Secretary of State's decision dated 30th January 2023 (PINS Reference: APP/N2345/V/22/3296374 – **Appendix 6**), the design was given significant weight as a benefit, but the SoS also gave significant weight to the demonstrable 'need' for the scheme to fulfil local requirements and "*allow for the creation of equal and cohesive communities and increase diversity*" which would "*strongly support the social objective of sustainable development under the Framework*".

5. Planning Appeal Process

5.1 In considering the procedure for this planning appeal, regard has been given to Annexe K of the Procedural Guide: Planning Appeals – England, updated by the Planning Inspectorate in June 2023.

5.2 Consideration has been given to the determination of the appeal by written representations and informal hearing, however the Appellant has reviewed the criteria for determining the procedures for a planning appeal and considers these procedures are not the most appropriate.

5.3 The Appellant firmly believes the most appropriate procedure is by Public Inquiry.

'there is a clearly explained need for the evidence to be tested through formal questioning by an advocate (this does not preclude an Appellant representing themselves as an advocate); or

the issues are complex; or

the appeal has generated substantial local interest to warrant an inquiry as opposed to dealing with the case by a hearing'

5.4 In this case, it is the Appellant's view that an inquiry is the most appropriate procedure for the following reasons:

- The weighting and application of specific Development Plan policies needs to be tested and interrogated. An inquiry would be the most appropriate arena within which to do this.
- The legal implications of the application of various policies within the Development Plan.
- The Council has demonstrated inconsistencies in their decision-making process, and the application of policies and guidance which must be tested by an advocate.
- The provision of supporting evidence, outlined in this Statement of Case, and to be submitted through the appeal process, requires testing by an advocate.

5.5 Other appeal procedures (e.g. hearing or written representations) would not allow for sufficient discussion and cross examination of the pertinent points and would therefore not be the most appropriate procedure.

5.6 We therefore respectfully request that the appeal is determined by an inquiry procedure.

6. Proposed Development

Quantum

- 6.1 The application comprises an Outline Planning Application for up to 51no. dwellings with all matters (save for access) reserved for later approval.
- 6.2 The proposed quantum of development amounts to a net density of 30 dwellings per hectare.

Layout

- 6.3 An illustrative layout was submitted with the application. A 45m wide greenspace buffer is located on the southern part of the site and wraps around part of the western edge of the site providing additional open space (including potential opportunities for SUDS features). It is the expectation all existing trees along the boundary of the site can be safeguarded, with only limited hedgerow loss to allow for the access road and pedestrian access. Whilst layout is a reserved matter, the general location of the development and open space areas can be secured by condition referring to the Parameter Plan submitted with the application which gives commitment to the greenspace buffers shown on the illustrative layout.
- 6.4 The internal road layout is yet to be determined but it is the expectation that these would be to adoptable standard, with on-plot parking possible.

Access

- 6.5 Access to the site will be afforded from a new junction with Garstang Road. It provides a visibility splay suitable for an access onto a 20mph road. Separate cycle and pedestrian access will also be provided to interlink with the Guild Wheel which runs parallel with the northern boundary of the site. The existing cycle route along Garstang Road will have priority over the access to the site as agreed with Lancashire County Highway Authority.

Dwelling Typologies / Tenures

- 6.6 The following dwelling typologies and tenures were offered unilaterally by the applicant at the time of the application resubmission:
- Housing for over 55's (10%)
 - Increased provision of affordable housing with a focus on the affordable rented sector and First Homes (40%)
 - Accessible and Adaptable M4(2) and Wheelchair M4(3) dwellings
 - Larger homes for BAME households
 - Self-build plots

- 6.7 This proposal sought to respond directly to the latest housing needs evidence published by the Central Lancashire authorities, including Preston, in September/October 2022.
- 6.8 Following PCC's determination of the application, the Appellant has reviewed the proposed dwelling typologies and tenures offered. Following this review, the Appellant seeks to omit the self-build plots from the proposed development.
- 6.9 It is noted that the appeal process does not specifically allow for amendments to be made to a proposed development. However, where amendments are proposed by the Appellant, the Wheatcroft Principles should be taken into account by the Inspector, whereby, *"judgement should be exercised...[as to whether] the development is so changed that to grant it would be to deprive those who have been consulted on the changed development of the opportunity of such consultation"*⁴
- 6.10 It is considered that the proposed omission of self-build plots from the proposed development would not deprive those who have been consulted as the proposed dwelling typologies and tenures were offered unilaterally for further discussion and PCC's position is that there is no evidenced need. Therefore, as the need for self-build has reduced they have been removed from the proposal.

⁴ Bernard Wheatcroft Ltd v SSE [JPL, 1982, P37]

7. Outline Application Process

- 7.1 As set out at Section 1, the OPA was submitted with all matters reserved except for access. For clarity, access for the purposes of this OPA comprises solely the pedestrian and vehicular access zone from Garstang Road and pedestrian and cycle link to the Guild Wheel. No details in respect of the internal roads have been provided beyond the key principles aligning with the illustrative layout.
- 7.2 The points of agreement reached within the refused OPA (Reference: 06/2021/1104) formed the starting point for the revised submission.
- 7.3 Where technical matters were agreed previously (see **Table 1**) it was not proposed to revisit/address these through the revised OPA subject to the appeal.
- 7.4 Instead, the revised OPA solely sought to overcome the refused OPA RfR by providing further evidence/justification for the proposed development and also altering the proposed housing offer.

Process

Submission and Validation

- 7.5 The OPA submission was submitted via the Planning Portal on 5th January 2023 and released to PCC on 6th January 2023. The application was made valid by PCC the same day i.e. 6th January 2023 under reference: 06/2023/0030.

"Outline Planning Application seeking approval for access only for residential development for up to 51no. dwellings with associated works (all other matters reserved)"

- 7.6 As set out previously, the OPA followed a refusal by PCC in January 2022 (reference: 06/2021/1104). The revised OPA was submitted within the 12 months following the initial decision.

Post-submission

- 7.7 The statutory consultation period ran from January to March 2023. Details of responses and amendments prepared are summarised below:
- The LLFA requested further information on 24th January 2023. The further information was provided by the applicant on 6th February 2023 in the form of a revised Drainage Strategy, with the LLFA removing their objection on 14th February 2023.
 - Lancashire County Council ('LCC') Highways also requested clarification in respect of access arrangement on 1st February 2023, which was provided through an updated Transport Assessment and updated Parameter Plan issued to PCC on 10th February 2023. LCC removed their objection on 9th March 2023.

- 7.8 The OPA was heard at PCC Planning Committee on 30th March 2023 with an officer recommendation to refuse. All 11no. members present voted in line with the officer recommendation. Members did not put forward any additional reasons for refusal.
- 7.9 Table 1 highlights that there are no outstanding technical objections from statutory consultees; all raise no objection subject to certain conditions and/or planning obligations being secured. The Appellant is agreeable to securing the requested financial contributions, subject to CIL compliance, through a Section 106 legal agreement.

Other Technical Matters

- 7.10 All other technical matters were agreed with PCC and the relevant statutory consultees. See **Table 3** for a summary.

Consultee	Comment	Agreed with PCC
United Utilities	No objection subject to appropriate conditions to control surface water management	Y
Natural England	No objection	Y
County Highways	No objection subject to conditions requiring the submission of a scheme for the new site access/junction, the new estate road/access shall be constructed in accordance with the LCC's Specification for Construction of Estate Roads, submission of details relating to the arrangements of the management and maintenance of the proposed streets, provision of the approved car parking areas, submission of the condition of the highway, provision of wheel cleaning facilities, provision of electric vehicle charging points and cycle parking	Y
Lead Local Flood Authority	No objection subject to conditions requiring the development to be carried out in accordance with the submitted Flood Risk Assessment, Surface Water Sustainable Drainage Strategy and Sustainable Drainage Pro-forma, and the submission of: the final Surface Water Sustainable Drainage Strategy; a Construction Surface Water Management Plan; a Sustainable Drainage System Operation and Maintenance Manual; and a Verification Report of the constructed sustainable drainage system.	Y
National Highways	No objection subject to a condition requiring a travel plan.	Y

County Education	No objection subject to a S106 obligation to secure funding for additional school places.	Y
Greater Manchester Ecology Unit	No objection subject to conditions requiring the submission of tree protection measures, details of any external lighting, no vegetation clearance during bird nesting season, the development to be carried out in accordance with Amphibian Reasonable Avoidance Measures and the submission of biodiversity enhancement measures.	Y
Environmental Health	No objection subject to following the recommendations of the Phase 1 Desk Study Assessment and the undertaking of a Phase 2 Geo-Environmental Site Investigation.	Y
Parks and Streetscene (landscape)	No objections subject to a condition requiring the submission of a hard and soft landscaping scheme	Y
Parks and Streetscene (Trees)	No response received.	
Waste Management	No objection subject to collection agreements and a Waste Management Plan for subsequent reserved matters.	Y

Table 3 - 06/2023/0030 - Statutory Consultee Responses

8. Planning Policy Context

8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the adopted development plan unless material considerations dictate otherwise.

The Development Plan

8.2 The following section outlines the relevant policies of the adopted development plan and analyses the degree to which the proposals accord with policies and the extent to which they are consistent with the NPPF.

8.3 The Development Plan comprises the following documents:

- Central Lancashire Core Strategy (CLCS) (July 2012)
- The Preston Local Plan (PLP) (Site Allocations and Development Management DPD) (July 2015)
- Broughton-in-Amounderness Neighbourhood Plan (BNP) (August 2018)

8.4 The Development Plan documents seek to promote and direct growth within the borough of Preston to ensure a sufficient supply of housing and employment land, promote opportunities for growth and ensure well designed and resilient communities are developed.

8.5 The policies cited within the Committee Report are set out in a Policy Compliance Matrix at **Appendix 7** and therefore the full details of the relevant policies are not rehearsed here.

Other Material Considerations

8.6 A number of other significant material considerations are relevant to the decision-making process of this application. Some have newly arisen since the previous 2022 decision.

8.7 Throughout this Statement, a number of appeals are referenced where they provide important information relevant to the determination of this application. These constitute material considerations and should be given significant weight in the planning balance argument.

National Planning Policy Framework (NPPF)

8.8 The National Planning Policy Framework (NPPF) sets out the overarching planning policies from the Government. The NPPF was updated in September 2023 and forms the overarching planning guidance in England.

8.9 The central aim of the NPPF and the planning system is highlighted in paragraph 7.

'The purpose of the planning system is to contribute to the achievement of sustainable development.'

- 8.10 Where proposals are sustainable there is a presumption in favour of the development which is the core of the NPPF:

'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development' (paragraph 10).

- 8.11 The NPPF advises that there are three dimensions to sustainable development: economic, social and environmental (Para. 8) and establishes a presumption in favour of sustainable development stating that sustainable development proposals need *'approving... without delay'* (Para. 11). Para. 11 states that for plan-making this means that:

- A) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- B) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 8.12 Para. 11 states that for decision-taking, this means:

- C) approving development proposals that accord with an up-to-date development plan without delay; or
- D) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 8.13 Para. 12 sets out that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-

making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

- 8.14 The Framework, taken as whole, represents the Government's definition of what constitutes sustainable development. These aims are mutually dependent and should be sought jointly and simultaneously by the planning system.

Delivering a Sufficient Supply of Homes

- 8.15 The NPPF supports the Government's objective of significantly boosting the supply of homes, requiring a sufficient quantity and variety of land to come forward.
- 8.16 The minimum number of homes required should be informed by the local housing needs assessment, calculated using the standard methodology in national planning guidance (Paragraph 61).
- 8.17 Paragraph 62 state that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, people with disabilities and people who rent their homes, among others).
- 8.18 Paragraph 69 encourages the use of small and medium sized sites, which can be developed in a time-efficient manner to support local authorities in meeting housing requirements.
- 8.19 Paragraph 74 requires local authorities to be able to demonstrate a '*supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing*' against local housing need.

Promoting healthy and safe communities

- 8.20 Paragraph 92 states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a. promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
 - b. are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

- c. enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Open Space and Recreation

- 8.21 Paragraph 98 states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.
- 8.22 Paragraph 98 states that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Promoting sustainable transport

- 8.23 Paragraph 105 states that the planning system should actively manage patterns of growth in support of overarching objectives. It elaborates, stating that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 8.24 Paragraph 110 states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
 - a. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b. safe and suitable access to the site can be achieved for all users;
 - c. the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code
 - d. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Design

- 8.25 The NPPF supports the creation of well-designed places, which shapes sustainable communities that warrants development being acceptable.
- 8.26 Paragraph 130 details the minimum requirements planning policies and decisions should ensure, including:

'Developments that function well and add to the overall quality of the area, for the lifetime of the development;

- *sympathetic to the local character and history, taking account of the local built environment;*
- *visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *establish or maintain a strong sense of place, using materiality and massing;*
- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development;*
- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.'*
- *Great weight is afforded to the inclusion of trees in the enhancing the quality of the urban environment, whilst aiding the mitigation of climate change. This is largely translated to the design of tree-lined streets, retention of trees and newly-planted trees within development.*

8.27 Paragraph 131 states that appropriate measures should be put in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.

8.28 Paragraph 134 advises *'development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design'*.

8.29 Paragraph 134 further recommends that significant weight should be given development which accords to local design and national guidance, which displays exemplary design that achieves and/or raises the standard of design.

Habitats and Biodiversity

8.30 Paragraph 180 states that *(inter alia)* development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Heritage

8.31 Paragraph 194 of the NPPF requires as a minimum, that the significance of any heritage asset that may be affected by a proposal to be identified and assessed. The assessment should be taken into account when considering the impact of a proposal on a heritage asset.

8.32 'Great weight' should be afforded to the preservation of designated heritage assets, stressing 'the more important the asset, the greater the weight should be' (Para. 199). This is of particular relevance for Conservation Areas.

- 8.33 Paragraph 202 goes on to state: 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...'
- 8.34 Paragraph 206 advises 'Local planning authorities to look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.

Glossary

- 8.35 The NPPF defines 'older people' as: People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

National Planning Policy Guidance (PPG)

- 8.36 National Planning Practice Guidance seeks to add further context to the NPPF and it is intended that the two documents are read together.
- 8.37 Paragraph 008 (ID: 21b-008-20140306) states that material planning considerations are those which are relevant to making the planning decision in question (e.g. whether to grant or refuse an application for planning permission). It states that the scope of what can constitute a material consideration is very wide and so the courts often do not indicate what can be a material consideration; in general however, the courts have taken the view that planning is concerned with land use in the public interest. Therefore the protection of purely private interests could not be material considerations.
- 8.38 Paragraph 009 (ID: 21b-009-20140306) set out the approach to weighting in respect of material considerations. It states that provided that regard is had to all material considerations, it is for the decision maker to decide what weight is to be given to the material consideration in each case, and (subject to the test of reasonableness) the courts will not get involved in the question of weight.
- 8.39 Paragraph 013 (ID: 21b-013-20150327) sets out that a local planning authority may depart from development plan policy where material considerations indicate that the plan should not be followed.
- 8.40 Paragraph 002 (ID: 63-002-20190626) states that the provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives. Unsuitable or un-adapted housing can have a negative impact on disabled people and their carers. It can lead to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities. Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives. It adds that it is important to plan early to meet such needs throughout their lifetime.

8.41 Paragraph 001 (ID: 67-001-20190722) states that whilst the standard method for assessing local housing need identifies the overall minimum average annual housing need figure, it does not break this down into the housing need of individual groups. It encourages plan-making authorities to identify and plan for the housing needs of particular groups of people.

Supplementary Planning Documents

Central Lancashire Design Guide SPD

8.42 The Central Lancashire Design Guide provides an overview of the design principles that the Central Lancashire authorities will employ when considering planning proposals. A key objective of the SPD is to raise the level and quality of design of new buildings within the built environment across Central Lancashire and in so doing reinforce its unique character. It sets a benchmark for design quality by endorsing best practice and requiring new development to enhance the character of the area through good design.

8.43 The Design Guide seeks to achieve this by 6 key design principles, as follows:

1. **Movement and legibility** – A place that is easy to get to, move through and is easy to understand
2. **Space and enclosure** – A place with attractive, sustainable and successful outdoor areas where public and private spaces are clearly distinguished
3. **Mix of Uses and Tenures** – A development that promotes a variety and choice in terms of uses and ownerships in respect to local needs
4. **Adaptability and resilience** – A development that can adapt and respond to changing economic, social and technological conditions
5. **Resources and efficiency** – How the development contributes to tackling climate change and adapting to and mitigating its effects both in its construction and operation
6. **Architecture and Townscape** - A development that responds positively to its surrounding environment through its external appearance and form

Central Lancashire Affordable Housing SPD

8.44 The purpose of this SPD is to provide advice on how the Councils' affordable housing policy, as set out in DPDs, is to be implemented. This includes guidance on a range of approaches, standards and mechanisms required to deliver a range of affordable housing to meet local needs.

Central Lancashire Open Space and Playing Pitch SPD

8.45 The purpose of this SPD is to provide advice on how the Councils' open space and playing pitch policies, as set out in the Local Plans, are to be implemented. This includes guidance on provision standards and how they will be applied. It sets out that all new

residential development will be required to contribute towards open space and playing pitch provision with the exception of the following: nursing / rest homes; sheltered accommodation; and replacement dwellings.

- 8.46 The SPD sets out the methodology for calculating the contribution requirements or quantum of open space to be provided on site.

Central Lancashire Employment Skills SPD

- 8.47 This SPD introduces Employment Skills Statements and provides clarity as to how this requirement relates to the relevant policies set out in the Core Strategy and Local Plan as well as the guidance set out in the NPPF.

- 8.48 One of Central Lancashire's priorities is to encourage economic growth within Central Lancashire that benefits the people and businesses in the three boroughs. The SPD seeks to:

- Increase employment opportunities by helping local businesses to improve, grow and take on more staff.
- Help businesses to find suitable staff and suppliers, especially local ones.
- Improve the skills of local people to enable them to take advantage of the resulting employment opportunities.
- help businesses already located in Central Lancashire to grow and attract new businesses into the area.

Emerging Central Lancashire Local Plan ('ECLLP')

- 8.49 Central Lancashire started the consultation on Part One (Preferred Options) of the new Local Plan in December 2022. The consultation closed 24th February 2023. Given the embryonic stages of the Plan, the policies can be given limited weight, however, it is useful to review the document when preparing applications within the Plan Area. The latest published housing needs evidence base supporting the production of the new ECLLP are given significant weight in the planning balance as this evidence, published by the Council, provides the most up-to-date picture of housing needs in the area – the appellant accepts this evidence in support of the appeal. The DLP Housing Study was presented and agreed to be taken forward by members of Strategic Planning Joint Advisory Committee on 12th September 2022.

- 8.50 Of particular reference to this proposed development is the revised Settlement Hierarchy and the proposed allocation of housing numbers (110 dwellings) in Broughton. On this basis, appropriate reference has been made to emerging policies throughout this statement.

- 8.51 Whilst we give weight to the underlying evidence base of the eCLLP, we consider that the proposals would not be premature to the emerging Local Plan itself as it does not meet the limited circumstances identified in para 49 of the Framework. The site is simply not of a scale to undermine the plan-making process. Even if the Council were to

advance a prematurity case, this would contradict their approval of Land at Bartle, Preston, (ref 06/2020/0888) for outline planning of up to 1,100 dwellings in open countryside in the context of there being a five year housing land supply.

8.52

Other Studies

PCC Housing Need and Demand Assessment (HNDA) (Arc4, December 2022) (Appendix 8)

8.53 This assessment was prepared on behalf of PCC to provide up-to-date evidence on housing need across all sections of the community over the period 2021 to 2038; the appeal proposals would deliver housing within this period. The report identifies affordable needs, housing mix and housing needs of different groups across Central Lancashire. The evidence set out informs the emerging Central Lancashire joint Local Plan, as well as other strategies, policies and decisions of PCC and its partners. Specific parts of this report are set out later in this Statement in support of the proposals.

Central Lancashire Housing Study (DLP Planning / Edge Analytics, September 2022) (Appendix 9)

8.54 This Housing Study identifies the level and proportional split of future housing needs across the three boroughs within Central Lancashire (Chorley, Preston and South Ribble) for the period 2023 to 2038, comprising the sum of individual figures the constituent local authorities. The appeal proposals would deliver housing within the study period. Specific parts of this report are set out later in this Statement in support of the proposals.

9. Accordance with Development Plan Policy

- 9.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 9.2 The Council refused planning permission for a single reason citing three separate policies within the adopted development plan.
- 9.3 This section therefore assesses the following:
1. The proposed development does not conflict with the Council's adopted spatial strategy as outlined in Policy 1 of the Central Lancashire Core Strategy; and,
 2. The impact of development within the defined open countryside adjoining Broughton in concern of Policy EN1 of the Preston Local Plan and Policy RES1 of the Broughton Neighbourhood Plan.
- 9.4 This section presents the appellant's evidence and case to these considerations.

Reason for Refusal 1 – Conflict with Spatial Strategy

Performance of the Spatial Strategy

- 9.5 The purpose of defining tiers of settlements within a spatial development strategy is to encourage a pattern of development across a plan area to promote sustainable growth as well as protect the character of rural settlements and areas.
- 9.6 In the case of Preston and the wider Central Lancashire area, Policy 1 sets out the basis to deliver on the plan's objectives to focus growth and investment on brownfield sites and Strategic Locations. The Core Strategy was adopted in July 2012 and its preparation (including the settlement hierarchy) was undertaken years prior; a publication version was published in December 2010 and submitted to the Secretary of State on 31 March 2011. The Government published the first National Planning Policy Framework on 27 March 2012. At the time of the plan's adoption the strategy was to both encourage urban regeneration and target settlement expansion areas such as the North West Preston Strategic Location. Lower order settlements are then apportioned 'some' or 'limited growth and investment' through the defined tiers.
- 9.7 The CLCS explains the meaning of Spatial Vision as '*The overall vision for an area that sets out how it should be at a date in the future*' (CLCS Glossary). The Plan period is 2010-26 and we are now over 13 years into the period with less than 3 years remaining. Therefore in setting tiers of growth priorities, it is an important factor to consider whether the Plan has been successful through the adopted policy of meeting the targets.

Location of housing completions 2012-2020

Location	No. of dwellings completed 2012-2019	% of dwellings completed 2012-2019	Central Lancashire target (%)
Preston/ S Ribble Urban area <i>*(within strategic sites and locations)</i>	4,740 (1,790)	46.3% (17.5%)	48% (25%)*
Buckshaw Village	1697	16.6%	10%
Key Service Centre	2,451	23.9%	25%
Urban Local Service Centre	1,755	17.1%	9%
Rural Local Service Centres and elsewhere	1,407	13.7%	8%
Total	10,234	100%	100%

* Included within 48% for Preston/South Ribble UA

- 9.8 Approximately 63% of all development has taken place within the priority Strategic Locations and urban area Buckshaw village against the target of 60%. Key service centres of Longridge, Chorley and Leyland/Farinton have then attracted 23.9% of growth against a target of 25%. In combination, Urban Local Service Centres and Rural Local Service Centres with 'other places' have then attracted 17%. The Core Strategy performance monitoring framework (Appendix D of Core Strategy) includes a flexible trigger allowance of +/- 20% variance from distribution of development before considering a review of the policy.
- 9.9 Therefore, over the plan period, the spatial strategy is achieving its objective in directing the majority of growth towards higher order settlements despite being significantly helped by the granting of development contrary to EN1 as well as a period of windfall development when the LPA could not demonstrate a five year housing land supply. The appeal proposals do not individually or cumulatively affect the success or outcome of the focus and direction of the policy. There is therefore no planning harm to the overall spatial vision caused by the proposals of 51 dwellings which represents only 0.6% of the minimum housing requirement for Preston (507 dpa).

Exceptions Permitted by Policy 1

- 9.10 CLCS Policy 1 seeks to direct growth within the Plan area to higher order settlements. Part (f) of the Policy states that "*in other places- smaller villages, substantial built up frontages and Major Developed Sites- development will **typically** be **small scale** and **limited to appropriate infilling**, conversion of buildings and **proposals to meet local need** unless there are exceptional reasons for larger scale redevelopment schemes"* (Our emphasis added).
- 9.11 It is therefore clear that the appeal proposals, or indeed any development, are not explicitly or strictly prohibited by the policy. Whilst Policy 1 seeks to direct growth, it does not prescribe targets, or limits, to developments in specific settlements (or types of settlement) and it permits specific sites to be brought forward for different or larger scale developments beyond those the policy sees as more 'typical' in such areas. Whilst the Core Strategy directs 8% of growth to 'Rural Local Service Centres and elsewhere' this is in the context of the housing requirement being a minimum; additional development is not automatically harmful.

- 9.12 A similar situation was observed in Appeal APP/R3650/W/21/3278196⁵, for a residential development scheme in Alfold (**Appendix 10**). This appeal decision assessed a spatial policy and the absence of capping development numbers in specific settlements.
- 9.13 The policy in question, like CLCS Policy 1, sought to prioritise development in higher order settlements and allowed for 'limited' growth in lower order settlements. However, the Policy placed no cap or upper limit, leaving opportunities for interpretation and justification of development.
- 9.14 In the determination of the appeal, Inspector Stephens stated that whilst the settlement subject to the application was "*doubling as a result of recent consents*", the lack of ceiling or development cap in the policy, did not mean the proposed scheme was indicative of a policy breach⁶. Furthermore, the Inspector stated that as the intention of the policies was to meet the overarching, borough-wide development targets, the development of the proposed site would comply with this strategic aim, therefore not representing a policy conflict.
- 9.15 Turning to Broughton and the Core Strategy, as with the case in Alfold, CLCS Policy 1 does **not** prescribe any targets or impose a ceiling on development in lower order settlements, such as Broughton. It is acknowledged that there is a plan-wide **minimum** housing target and a requirement of PCC to meet this. Whilst there is supporting text around the desired location for growth (in line with the settlement hierarchy), there is **no** commitment or **limit** to the actual development numbers that should be achieved/not breached in each specific settlement. This is not surprising as the CLCS examining Inspector Hollox made clear that the requirement was a minimum in his Report (**Appendix 11**).
- 9.16 Using the same logic that Inspector Stephens applied, means that even though Broughton is at the lower end of the settlement hierarchy, the lack of specific targets in the policy does not automatically equate to unacceptable or unsustainable growth or, indeed, harm.
- 9.17 Furthermore, CLCS Policy 1 only states that development in other rural areas should 'typically' (but not always) be 'limited'- but, as with Alfold, the plan is silent on the quantity of such development within Broughton. Given the absence of any specific development quotas for Broughton, it suggests that subject to a thorough and robust justification for the scheme being put forward, there is scope for an applicant to demonstrate that a proposed development is appropriate within sustainable lower order settlements and the consideration of specific harm or impacts and consequent benefits brought by any particular scheme. This is the approach the Council has taken on other windfall developments (see Planning History section) irrespective of whether there is or is not a five year housing land supply.
- 9.18 Relevant assessments on development in lower order settlements were also made by Inspector Edwards in an appeal in Benger⁷ (**Appendix 12**). The development sought consent for 21 dwellings on land outside the defined settlement boundary of Benger. In his decision, the Inspector refers to the 'Rural Housing' section of the NPPF

⁵ Appeal Ref: APP/R3650/W/21/3278196 - Land west of Loxwood Road, Alford, Surrey, GU6 8HN

⁶ Paragraph 25 of Appeal Decision

⁷ Appeal Ref: APP/Y3940/W/21/3285458 Land at Sutton Lane, Sutton Benger, Wiltshire SN15 4RR

(paragraphs 78- 80). Paragraph 79 states that *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*.

- 9.19 Inspector Edwards concluded that whilst the application site was outside of the settlement boundary, the accessibility of the village and the associated facilities would ensure this was a sustainable location, and the development would promote the vitality and success of the rural facilities. In the case of Broughton, it is demonstrated below that the settlement presents a sustainable village capable of accommodating growth. As such, the proposals would add a small mixed population to the community and help support and sustain the businesses and services that exist within Broughton village, thus complying with paragraph 79 of the Framework.
- 9.20 Comparable arguments around the location of growth were also noted by Inspector Vyse in an appeal in Clifton⁸ (**Appendix 13**). In their assessment of the proposals, Inspector Vyse acknowledged the changing nature of Clifton. They also confirmed that *“growth is a characteristic of the settlement”*, acknowledging that Clifton had been subject to a number of recent residential developments, however such consents were not causing a *“material change to the overall character of the village in its current form or its identity as a nucleated settlement surrounded by fields”*⁹.
- 9.21 Regarding Broughton, whilst Inspector Manning concluded (when considering appeal APP/N2345/W/17/3179105¹⁰ - **Appendix 4**), that *“it is very apparent that Broughton has expanded beyond its early nuclei”*, in line with conclusions of Inspector Vyse, it is our view, agreed with the Council, that this development would not materially harm the overall character of the village – something that is not disputed in the Committee Report where it is concluded as follows in respect of the proposed development's impact on the Area of Separation... *“As such, it is considered the effectiveness of the Area of Separation gap would be maintained and the identity and distinctiveness of the village preserved.”* This is common ground.
- 9.22 In light of the above, whilst proposals are not the 'typical' form of development which is usually permitted by Policy 1, it does not lead to harm to the character of Broughton. Indeed, it is also common ground that the proposals would not cause landscape harm and are well-contained.
- 9.23 Recent and local appeal decisions considering the same matters can further add to the legitimacy of drawing specific conclusions. In this regard as well as reinforcing the point above, the decision at Key Fold Farm is also key to assessing other interlinked matters in relation to the conflict with the adopted spatial strategy.
- 9.24 Whilst that decision was reached against the backdrop of the tilted balance, the magnitude of the conflict with spatial policies and the impacts on the open countryside in comparison to these appeal proposals were substantially greater.
- 9.25 Inspector Manning in grappling with the conflict with the spatial strategy concluded:

⁸ Appeal Ref: APP/P0240/W/18/3211229 Land off Broad Street, Clifton SG17 5RR

⁹ Appeal Ref: APP/P0240/W/18/3211229 Paragraph 16

¹⁰ Appeal Ref: APP/N2345/W/17/3179105 Land off Sandy Gate Lane, Broughton, Preston, PR3 5LA

I am conscious that Policy 1 of the Core Strategy plans for a development pattern that, for the whole of Central Lancashire, concentrates development according to a settlement hierarchy within which the Preston /South Ribble Urban Area occupies the top tier (a) and smaller settlements including Broughton are included in the lowest tier(f). I place little weight on the appellants' repeated emphasis that the lack of settlements within the intermediate tiers is a significant factor in support of their appeals. The Core Strategy, which addresses the relevant housing market area, self-evidently transcends administrative boundaries so far as the settlement hierarchy itself is concerned. In planning terms the lack of intermediate tiers within Preston is not therefore, in my view, an important or influential factor.

59. Equally, I do not share the erstwhile apparent view of the Council that, because the spatial strategy embodied in the Core Strategy is driven by considerations of sustainability and considered to support and promote a sustainable pattern of development, departures from the articulated aspiration are to be presumed unsustainable. The strategy reflects a policy choice which is considered to optimise the settlement pattern in sustainability terms. Variations on the theme are not necessarily unsustainable in planning terms, not least in view of the definition of sustainable development set out in the Framework at paragraph 6.

- 9.26 Inspector Manning then turns to considering whether the particular proposals in question lead to unsustainable development (which they did not) which the Inspector was entitled to do in recognition of the relevant factors of the site location and settlement credentials. We agree with this approach.

Broughton as a Sustainable Settlement for Growth

- 9.27 Central to our case is that the settlement of Broughton is a sustainable location for growth which has evolved through the current plan period as a result of developments which have been approved and local facilities improvements. The level of growth within Broughton through the plan period is testament to the actual credentials of the settlement to sustain growth sustainably.

Settlement	Population growth over the last 10 years	Number of dwellings approved over the plan period ¹¹
Key service centres		
Longridge	7,526 to 8,437	649
Urban Local Service Centres		
Adlington	9,211 to 10,372	183
Clayton Brook Green		46
Clayton-le-Woods	14,532 to 15,960	335
Coppull	7,959 to 8,304	399
Euxton	8,118 to 8,306	646
Whittle – le- Woods	5,434 to 6,810	296
Local Centres		
Brinscall/Withnell	1,388 to 1,335 / 898 to 853	14
Eccleston	4,234 to 4,541	114
Longton	8,800 to 8922	32
Other Rural Centres		
Broughton		320 ¹²

Table 4 - Data showing settlement growth

9.28 As we presented in our Planning Statement (**Appendix 14**), at paras 60-65 Inspector Manning outlined the sustainability credentials of Broughton and the site's location in relation to key facilities and services.

66. *All in all, I do not consider Broughton to be notably poorly served in terms of access to services and facilities or choice of transport modes. It is a core principle of the Framework, underpinning both plan-making and decision taking, to "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable." Policy 1 of the Core Strategy notwithstanding, I do not consider the proposed developments would offend that principle. If anything the reverse is true. They would be well located in those terms by comparison with housing sites associated with many freestanding settlements and the initial stance of the Council on this issue does not in my view withstand scrutiny.*

67. *It is recognised by all parties that the proposed developments at issue would both conflict with Policy 1 of the Core Strategy. No other position would be tenable. They simply do not accord with the policy choice which has been made locally to concentrate development in accordance with a specified hierarchy. Often repeated without good reason, developments such as those proposed would be insupportable in the context of a plan-led system. Individually, and more especially cumulatively, the pattern of development sought by the Core Strategy would be eroded, and the object of promoting it would be undermined.*

68. *However, the underlying rationale of the policy is the achievement, essentially, of a spatial pattern of development that is sustainable and the degree of harm to that*

¹¹ Up to submission of outline application in January 2023.

¹² Estimated figure calculated looking at only those schemes approved within or adjacent to the settlement boundary as per Broughton Neighbourhood Plan's boundary.

aspiration is tempered to a significant degree in the case of these appeals by my conclusions on the previous issue regarding accessibility. The conflict with the policy itself is greater than the conflict with its originating intentions. That might well not be the case in a more remote and less accessible location or in a settlement lacking, for example, very necessary schooling facilities.

- 9.29 In their assessment of development of the appeals before Inspector Manning, initially, PCC attested that Broughton did not reflect a sustainable location for growth owing to its positioning on the settlement hierarchy and associated infrastructure, facilities and amenities. However, through the co-joined appeal via public inquiry, PCC withdrew their objection relating to the suitability of Broughton as a sustainable location for growth. It is unclear, therefore, why the Council has sought to place such significant weight on the alleged conflict with Policy 1 in the context of this specific appeal in Broughton.
- 9.30 When determining the applications for Key Fold Farm/Sandy Gate Lane, PCC suggested that Broughton *“is a rural village with low accessibility to local employment areas, shops and services”*. In conclusion, Inspector Manning stated that he did *“not consider Broughton to be notably poorly served in terms of access to services and facilities or choice of transport modes”*. Moreover, the Inspector confirmed that developments at Key Fold Farm and Sandy Gate Lane would be *“well located in terms by comparison with housing sites associated with many freestanding settlements”* (Appeal Decision paragraph 66). Overall, Inspector Manning concluded that, *“the initial stance of the Council does not in my view withstand scrutiny”*.
- 9.31 This appeal was determined in 2018, at a time when the Broughton Bypass had only just opened and the transformation with a new highway layout, bus stop upgrades and public realm on Garstang Road had not yet been completed. It also pre-dated the opening of the new M55 junction which increases the capacity and sustainability for growth in the area, including Broughton. The appeal decision was also prior to the opening of the new large Co-op store in Broughton and the opening of the renovated Toll Bar Community Café. So in many respects, Broughton has become even more sustainable since Inspector Manning made his decision.
- 9.32 The conclusions of Inspector Manning are important material considerations in the determination of this appeal. It has been confirmed that Broughton constitutes a sustainable location, which, as proven by the appeal decisions for Sandy Gate Lane and Key Fold Farm, is capable of accommodating residential growth. Indeed, even since these appeal decisions, Broughton has undergone a transformation in terms of regeneration of the public realm, public transport enhancements, opening of the bypass and a new larger Co-op convenience store. In addition, Broughton is the only settlement outside of the city to accommodate a secondary school or college (see Appendix E of the PLP). Broughton High School has an Ofsted rating of ‘Outstanding’ and its geographical priority area for admissions are those living in Broughton. The appeal proposals would negate the need to travel to school by car being only 700m walking distance from the site.
- 9.33 Whilst it is noted that the application site lies outside the village boundary, the Framework promotes rural development which supports and enhances the vitality of rural settlements and facilities. Development lying outside a settlement boundary does

not automatically mean that actual harm arises, particularly if the context has changed since the boundaries were adopted. It has been demonstrated that the future residents of this scheme would have access to a good range of services and amenities within Broughton and the walk distance to these is appropriate and acceptable. In line with the decision made by Inspector Manning, it is considered that this type of development can succeed in enhancing and promoting the sustainability of facilities within the village. The table below sets out the nearby services / facilities including walking distance from the site's anticipated access.

Service / Facility	Walking Distance (walking time)
Broughton Park & Playground	270m (4 minutes)
Broughton C of E Primary School	650m (9 minutes)
Premier Convenience Store	85m (1 minute)
Toll Bar Cottage Café	260m (4 minutes)
Broughton & District Sports Club	500m (7 minutes)
Texaco Petrol Station	350m (5 minutes)
Broughton Dental Surgery	850m (8 minutes)
Co-op Food	400m (6 minutes)
The Broughton Inn	400m (5 minutes)
Broughton High School	700m (10 minutes)
Sota Beauty Salon	450m (6 minutes)
Broughton Scout Hall	500m (7 minutes)

Table 5 –Site Proximity Local Services and Facilities (not exhaustive)

- 9.34 Overall, it has been concluded by the Inspectorate in previous decisions that Broughton comprises a sustainable location capable of accommodating residential development. Furthermore, development on this site would comply with paragraph 79 of the Framework by supporting the services within Broughton. These decisions are material in reaching a judgement of the weight to be given to an alleged conflict of how, spatially, development is to be directed to settlements under Policy 1.
- 9.35 As was discussed by Inspector Manning, growth not envisaged by the adopted spatial strategy is not inherently unsustainable and harmful – this is evident by the number of sites approved by the Council and appeals allowed regardless of whether there is a five year housing land supply or not. It falls then to a consideration of the sustainability of the proposals in all respects to then determine that appropriateness whether that be set against a flat or tilted balance. It is testament to Broughton's credentials, that

housing has previously been permitted evidencing the sustainability of the settlement and capacity for growth.

- 9.36 This however is not PCC's current case to this appeal and they suggest the location of the proposed development is not suitable as it does not accord with the direction of growth as outlined in CLCS Policy 1. The evidence presented above clearly shows how the placement of Broughton in the settlement hierarchy, as a result of other approvals, does not reflect the current context. It is simply not enough for the Council to allege conflict with a policy without demonstrating how the proposals interact with that policy and how much weight to give the harm arising from any conflict. Nor is it appropriate, without justification, for the Council to ignore the determination of an Inspector of this key point on sites directly adjacent to the proposals who found Broughton to be sustainable and suitable for housing.

Emerging Settlement Hierarchy

- 9.37 In the justification text to Policy 1, definitions of the tiers of settlements are provided to explain the basis for settlements being characterised in the adopted strategy. For Local Service Centres para 5.52 explains:

Those Local Service Centres that are close to the Key Service Centre towns of Chorley and Leyland, which are more urban in character, are distinguished from Local Service Centres in more rural locations. Urban Local Service Centres benefit from short transport connections with services in the nearby towns. Rural Local Service Centres serve their own residents and those in nearby villages with basic services and are well placed to provide for future local housing and employment needs. Good access to services is essential if rural communities are to survive and prosper.

- 9.38 Para 5.53 then outlines the characterisation of what constitutes 'Other Settlements':

Outside of the main urban area and service centres, there are many smaller settlements. In the interests of sustainable development, growth and investment should be confined here to small scale infill and the change of use or conversion of existing buildings, in accordance with Policy 13 – Rural Economy. Affordable housing development of an appropriate scale on the edge of a rural settlement to meet a particular local need may be justified in accordance with national planning policy.

- 9.39 Clearly the settlement of Broughton has been overtaken by events and is now at odds with this definition within the current development plan since its adoption in 2012. To further exemplify this we have provided a comparison of Broughton with other Central Lancashire settlements considering what facilities/services are available. This looks at:

- School (primary and/or secondary)
- Places of worship
- Health care facilities
- Pubs/restaurants
- Convenience retail shops

Settlement (settlement hierarchy tier)	School	Places of worship	Health Care facilities	Pubs/restaurants	Convenience retail	Leisure Facilities
Broughton (Smaller villages - 1 (f))	Yes – primary and secondary	Yes- St John's Baptist Church	Dental surgery	The Broughton Inn, Toll bar Café	Co-Op Broughton	Broughton tennis club, Delta Hotel
Barton (Rural Local Service Centre – 1 (e))	Pre-school	St Lawrences Church	No	The Sparling	No	Barton Manor Hotel
Brinscall (Rural Local Service Centre – 1 (e))	Pre-school	Hillside Methodist Church	No	Cricketers Arms	No	Brinscall Swimming Pool
Churchtown (Smaller villages - 1 (f))	No	St Helen's Methodist Church	No	Horns Inn	No	No
Goosnargh & Whittingham (Smaller villages - 1 (f))	Primary school	St Mary's Church	No	The Stag's Head	No	Tennis Club
Hoole (Smaller villages - 1 (f))	Primary school	Hoole Wesleyan Methodist Church,	No	San Marco	No	No
Woodplumpton (Smaller villages - 1 (f))	Yes- primary school	St Anne's Church	No	The Wheatsheaf	No	No

Table 6 - Comparison of services in various settlements

9.40 The table above demonstrates that Broughton as a settlement has a wider range of amenities and services available to local residents when compared other Preston settlements assumed to be within the same tier (or in the case of Brinscall, the tier up) of the adopted Settlement Hierarchy. It is the only rural settlement which accommodates a primary and secondary school and has medical facilities within the village. All other settlements analysed are deficient in at least one of these facilities making them arguably less sustainable than Broughton.

9.41 Furthermore, PCC's position of how it considers Broughton in the settlement hierarchy has been devalued as a result of the publication of the ECLLP (Part 1 - Preferred Options) which shows the Council's own current views on how the settlement performs within the settlement hierarchy.

9.42 In the ECLLP, the settlement hierarchy has been revisited through the revisions to the Spatial Strategy. Table 1 of the ECLLP (**Appendix 15**) positions Broughton in Tier 4 (a Local and Rural Centre) with a potential allocation of 110 dwellings. This re-positioning of Broughton recognises the substantial change that has occurred in the settlement

since the adoption of the CLCS in 2012 and supports the evidence put forward in this Statement and supporting documents.

- 9.43 Whilst the publication of the ECLLP accepts there is a positive change in Broughton, as the plan is only at Regulation 18 consultation stage we accept that policies themselves can only be given limited weight. However, the up-to-date evidence base can still be given weight. It must be acknowledged that the Council accepts Broughton is sustainable and can sustain further growth particularly given the Part 1 – Preferred Options was approved for consultation by the Council at committee.
- 9.44 Broughton (as a current Policy 1 (f) settlement) will now be categorised the same as settlements such as:
- Higher Walton (currently Policy 1 (a) settlement)
 - Longton / New Longton (currently Policy 1 (e) settlement)
 - Ecclestone (currently Policy 1 (e) settlement)
- 9.45 The re-categorisation and associated housing allocation signify a distinct change in the treatment of Broughton compared to the adopted Development Plan position and highlight the evolution of Broughton as a settlement, and the suitability and sustainability as a location for growth.
- 9.46 Furthermore, the significance of Broughton's elevation within the proposed hierarchy would also see the settlement excluded from the list of lower order settlements where specific rural policy restrictions and character would apply (ECLLP Reg 18 draft page 35 Policy 4, criteria 2).

Reason for Refusal 1(2) – The type of development proposed and its acceptability in the 'Open Countryside'

- 9.47 As part of the RfR, PCC stated that the proposed development would not accord with the '*type of development deemed permissible in the open countryside under Policy EN1 of the PLP and Policy RES1 of the BNDP*'.
- 9.48 We accept the appeal proposals do not represent one of the noted exceptions of development which would be permissible in the open countryside within these policies. However, also of relevance is that these policies as mechanisms to control the type and character of development in environmentally sensitive or rural locations must also be read alongside Policy 1.
- 9.49 That policy makes allowances for exceptions and developments not assumed to be typical for the settlement presently. This actually represents a tension between Policy 1 and Policy EN1.
- 9.50 There is also a tension between EN1 and Policy AD1 of the PLP which is relevant to the proposals. AD1(a) states that "*Development within (or in close proximity to) the Existing Residential Area will be permitted provided that it meets the criteria listed which includes:*

a) the design and scale of the development is sensitive to, and in keeping with, the character and appearance of the area;

b) there would be no adverse impact on residential amenity, particularly by reason of noise, general disturbance and loss of privacy due to the activity under consideration or the vehicular/pedestrian movement it generates;

c) the proposal would not lead to an over-concentration of non-residential uses, detrimental to residential character and amenity, and;

d) the proposal would not lead to an over-intensification of use of the site.

9.51 Policy AD1 is shown on the Preston Proposals Map as covering the settlement area of Broughton. It is common ground that the proposals do not conflict with AD1. The appeal proposals are in close proximity to the existing residential area of Broughton and do not conflict with any of the criteria in AD1(a).

9.52 The tensions between policies was considered in the case of *Craighead in Tesco Stores Ltd. v Dundee City Council* [2012] UKSC 13; [2012] 2 P. & C.R. 9 (**Appendix 16**). Lord Reed observed in his judgment in that case (at paragraph 19):

*"19. That is not to say that such statements [of policy] should be construed as if they were statutory or contractual provisions. Although a development plan has a legal status and legal effects, it is not analogous in its nature or purpose to a statute or a contract. As has often been observed, development plans are full of broad statements of policy, many of which may be **mutually irreconcilable**, so that in a particular case **one must give way to another**.*

9.53 Therefore a decision is required as to which policy is to be given precedence which we believe should clearly be given to Policy 1 noting the overall spatial strategy and the way in which the Council has sought to use Policy EN1 to reinforce objections on grounds of conflict with spatial strategy for the sub regional area.

9.54 With regards Policy RES1 we highlight the judgment handed down in the case of *Chichester DC v SoSHCLG* [2019] EWCA Civ 1640 (**Appendix 17**). In that case, the proposal was outside the defined settlement boundary in the neighbourhood plan. The relevant policy stated:

The Neighbourhood Plan will support development proposals located inside the Settlement Boundaries of Southbourne/Prinsted, Nutbourne West and Hermitage/Lumley/Thornham, as shown on the Policies Map, provided they accord with other provisions of the Neighbourhood Plan and development plan.

9.55 The Inspector found:

11. The appellant contends that these policies are silent on the question of housing development outside of settlement boundaries and are, therefore, not relevant to the appeal proposal. The appellant points to the NP Examiner's Report which recommended the omission of wording from Policy 1 which would have required development outside of settlement boundaries to conform to development plan policy for the control of development in the countryside. Moreover, it is argued that the scale

of development proposed would not be inconsistent with the overall size of Southbourne or the level of development anticipated there in the development plan strategy. The appellant draws support for its approach from an appeal decision at Newick.

12. I agree with the appellant that the policies in question do not directly presume against development outside of settlement boundaries. Furthermore, it was accepted by the Council that LP Policy 5 does not set a cap on the amount of housing which may be provided. That much is plain from the policy's use of the phrase 'indicative housing numbers.'

- 9.56 The Inspector concluded that the scheme was not in conflict with the NP policies, though it did conflict with the aims of it. The Court of Appeal found (see paras 28 – 54) that the Inspector's approach was lawful, specifically at [40]:

40. Policy 1 of the neighbourhood plan supports proposals for development within the settlement boundaries, "provided they accord with other provisions of the Neighbourhood Plan and development plan". It responds to the role envisaged for neighbourhood plans by Policy 2 of the local plan: to fix settlement boundaries, within which "a presumption in favour of sustainable development" will apply. But it says nothing about development outside the settlement boundaries. It does not cut across the operation of Policies 2 and 45 of the local plan, which are the development plan policies specifically relevant to the determination of such proposals. Policy 2 of the neighbourhood plan is a policy of allocation. It carries forward, in the parish of Southbourne, the strategic imperative for the allocation of sites for housing development under Policies 2, 5 and 20 of the local plan. It is the parish council's response to that requirement. Like Policy 1 of the neighbourhood plan, however, it does not affect the operation of Policies 2 and 45 of the local plan.

- 9.57 In conclusion then, Policy 1 does not state that any development other than small scale would be refused, as in *Chichester*, larger scale development can come forward. Policy AD1 follows this approach. This is for a reason and is clearly intended to enact the plan's objective to remain adaptable to changing circumstances. Both Policy EN1 and RES1 would frustrate that ability by not allowing for similar exceptions and holding back Policy 1 from being able to adopt and approve sustainable development in specific cases.

- 9.58 Turning to the harm, it is a matter of common ground that the site is well contained on all sides and that the proposals do not impact on landscape character and visual amenity nor do they impact on the area of separation as agreed through the statutory consultation period (see **Table 3**). Contrary to what would normally be the case, no landscape and visual harms overall arise from the proposals being outside of the settlement boundary. This demonstrates that conflict with a policy does not automatically mean significant harm arises.

- 9.59 In this instance, the Council seeks to conflate the issue of conflict with the adopted spatial strategy of Policy 1 to also take in provisions of Policy EN1 and Policy RES1 to add strength to their case – as evidenced within the Committee Report (**Appendix 18**).

- 9.60 Whilst this position has been used by the Council in refusing other planning applications, they have also allowed development contrary to this position highlighting an

inconsistent basis in its own application of these policies when doing so against the 'flat balance' irrespective of the five year housing land supply position.

- 9.61 At the 5th November 2020 meeting of PCC's Planning Committee, a planning application (Reference: 06/2018/1157) for the development of 30 dwellings on land adjacent to 329 Preston Road, Grimsargh, was determined. The application was approved, with the following reason cited and minuted (**Appendix 19**) to justify PCC's decision in that case:

The village has been extended in the past, to the south of Preston Road, and therefore it is not considered that this development would result in a further extension of the village into Open Space. The development would constitute infill development, and would provide affordable housing. The benefits of the development would outweigh the conflict with the Development Plan.

- 9.62 It is notable that PCC made its decision on this basis. Upon review of those proposals, we consider the appeal site more accurately represents an infill site than in that case. The site is shown edged red on the aerial photograph below.



Figure 3 - 06/2018/1157 Site Plan

- 9.63 The particular growth around south Broughton has been more significant and this has had the effect of containing the appeal site more successfully. It is common ground with the Council that the proposals are well-contained. This should be a material factor in limiting the conflict with EN1 and RES1.
- 9.64 Furthermore, the Grimsargh proposals committed to 35% affordable housing provision (up to 11 units) whilst in the case of this appeal, the proposals will deliver 40% affordable housing provision (up to 20 units) plus additional provision of other benefits. We believe that a consistent application of policies as was applied to the Grimsargh proposal, would have resulted in an approval to the application proposals subject to this appeal.
- 9.65 In relation to the BNP, para 8.5.10 confirms modest flexibility towards housing development is supported by the local community, to help benefit meeting the needs of the village as well as supporting local facilities and community to avoid 'damaging larger estate developments within open countryside being pursued by volume

housebuilders.’ In addition, the neighbourhood plan explicitly recognises that “there is an acceptance that the opportunities to the housing stock within the defined settlement are modest and some additional scope for development close to the village could assist in meeting local housing needs, in supporting development of community facilities and activity, and in rebalancing a local community that is skewed towards the middle aged and elderly”¹³.

9.66 We concur with the BNP that there is limited scope for housing within the settlement boundary. Nor are there any available brownfield sites identified in the Broughton area on the Council’s brownfield register in which to meet needs¹⁴.

9.67 Policy RES1 allocates three sites within the Plan area, all of which are outside the settlement confines originally set by the Local Plan. These are:

Site	Size	Dwellings	Status
Land off Whittingham Lane	3.9 acres	44 dwellings	06/2022/0018 – Full Application (Approved)
Land at Park House	1.55 acres	30 dwellings	06/2017/1104 – Full Application (Approved)
Land in front of 522 Garstang Road	0.38 acres	No application submitted	

Table 7 – Sites Allocated within BNP

9.68 In the identification of suitable sites, the BNP states that the allocations represent ‘small scale housing developments’ which would propose “modest extensions to the settlement boundary, rounding off the wider village form”. Furthermore, they would “minimise intrusion into open countryside and the areas of separation, pose no threat to the villages” character or rural setting or to its identity and distinctiveness’ (paragraph 8.5.11 of the BNP). Clearly, ‘small scale’ is being interpreted and applied with flexibility at the local level by the allocation and approval of 44 dwellings and 30 dwellings outside of the settlement boundary in Broughton.

¹³ Para 8.3.5, Broughton Neighbourhood Plan

¹⁴ Preston Brownfield Register - <https://www.preston.gov.uk/article/1196/Brownfield-Land-Register>

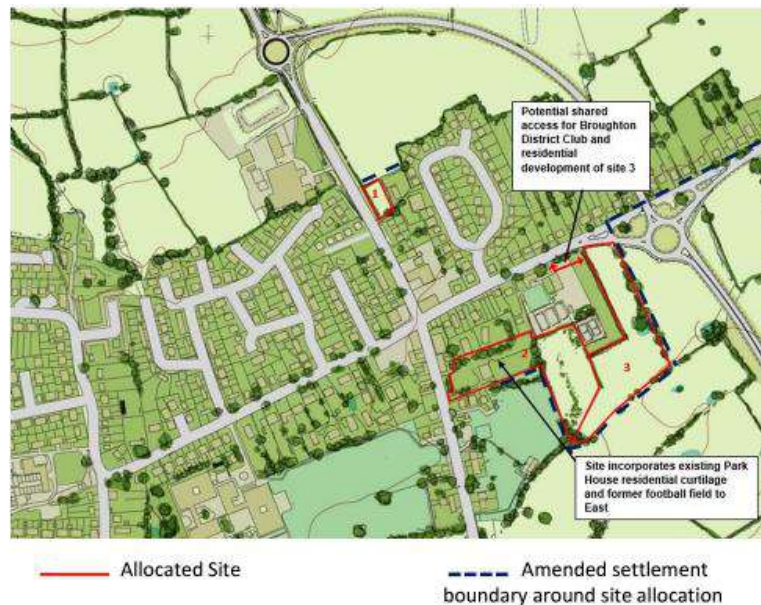


Figure 4 – BNP page 24

9.69 These planning consents on allocated sites represents a similar modest development scale to that subject of this appeal. Whilst it is agreed with the Council that there is no definition of 'small scale' in the CLCS, it is being applied flexibly (e.g. the approval of 44 dwellings). In addition, the appellant's experience and interest from the housebuilding industry in relation to this site demonstrates that if approved the proposals would not be of a scale to appeal to a national housebuilder and is more likely to appeal to an SME housebuilder. The NPPF considers SME sites make an "important contribution to meeting housing requirement of an area and are often built-out relatively quickly" (Paragraph 69).

9.70 Furthermore, it is common ground with the Council that the appeal proposals are well-contained, have no overall adverse impacts on landscape and visual, and would preserve the identity and distinctiveness of the village. In this context, the proposals would align with the aims and objectives of the BNP. In addition, a recent survey undertaken by the parish council in Summer 2023 found that:

- 89% were in favour of Broughton Parish Council working with property developers to try and influence future development to provide community facilities and infrastructure;
- The two most popular community facilities with 80% wanting more open spaces & 50% wanting more footpaths
- The types of dwellings that were most needed were bungalows, followed by semi and detached houses;
- When looking at the design of future developments the key factors were to retain mature trees, good landscaping, footpaths and cycleways and height.

9.71 The appeal proposals will help provide new open space in excess of minimum requirements, provide a range of dwelling types and sizes, and would be well designed including a significant biodiversity net gain.

9.72 In summary, we conclude that:

- The proposals scale is of a comparable size to what the BNP characterises as 'modest', given the development at Site 2 (30 dwellings) and Site 3 (44 dwellings);
- the proposals represent an infill form of development as a consequence of recent developments post adoption of the BNP to the west and east, and it is accepted through the determination of the planning application that it has minimal visual intrusion into open countryside;
- consequently there is no threat to the integrity of the area of separation; and
- there is no threat to the rural character, identity or setting of Broughton village.

9.73 Additionally RES (Housing General), within which Policy RES1 sits in the BNP states that housing proposals will be determined in accordance with policies of the CLCS and PLP. We therefore once again highlight the caveat to the general thrust of Policy 1 in relation to the suggestion that development will only **typically** be limited to small scale, infill development and proposals to meet a local need and therefore does not preclude proposals such as this appeal coming forward.

9.74 In this context, whilst policies EN1 and RES1 are in accordance with the Framework (which is a separate point), we conclude that the actual conflict with EN1 and RES1 from these specific appeal proposals is to be afforded **limited weight**.

Development Plan Conclusions

9.75 The appeal proposals accord with the development plan as a whole.

9.76 This section has then further presented and assessed evidence in relation to the most relevant policies of the adopted development plan.

9.77 In conclusion what we draw therefore from our analysis is that:

1. The spatial strategy detailed within Policy 1 has been successful across the plan period albeit helped by windfall development during a period of housing shortfall;
2. Policy 1 does not explicitly prohibit development in Broughton for the character of development proposed;
3. It has been found that larger scale growth can be supported on grounds of sustainability but that is down to the specific proposals and the settlement in question;
4. Such developments can represent a sustainable development in terms of its form, location and achieving the economic, social and environmental benefits which flow from development;
5. The proposal accords with Policy 1; and,

6. Conflicts with Policy EN1 and RES1 are to be afforded limited weight if applied correctly alongside Policy 1 provisions above.
7. Overall, with policies pulling in different directions, the scheme accords with the development plan.
8. Alternatively, the weight to the limited conflict with EN1 and RES1 is outweighed by the compliance with Policy 1, with the NPPF, and the benefits of the scheme.
9. If the Inspector concludes that the proposals do conflict with the Development Plan as a whole, we consider that there are a range of other policies that support the proposals and there are significant material considerations in this particular case (as set out in this Statement) that indicate the plan should not be followed in accordance with NPPF Paragraph 12.

10. Scheme Benefits

Overview

- 10.1 The appeal proposals are in response to evidence provided by PCC which demonstrates a need for specific housing in Preston. As such, the scheme proposes a bespoke housing mix of:
- 10% housing for over 55s;
 - Increased provision of affordable housing to 40%;
 - Accessible and Adaptable M4(2) and Wheelchair M4(3) dwellings;
 - Larger homes for BAME households.
- 10.2 CLCS Policy 1 and PLP Policy EN1 provide circumstances where development in lower order settlements can be accepted. One of these circumstances is when a proposal directly responds to an identified local need and the approval of such a scheme would assist the Local Authority in meeting this need.
- 10.3 The following section of this statement confirms that the proposed development meets this policy test which is strengthened by a bespoke offer of tenure and housing types and as such, complies with this part of Policy 1 and EN1.
- 10.4 It should be emphasised here that PCC did not dispute the validity of the evidence provided to them in respect of housing needs within their Committee Report. They did however query the application of this at the micro-level and how the broader borough assessments undertaken translated to Broughton as a locality. The evidence below sets out that there are clear newly arising needs and circumstances in Broughton locally, not just across the borough that the proposals directly respond positively to.

Market Housing

- 10.5 The Council suggest that as a result of a 'very healthy supply of housing land', cumulatively the benefits of the proposals do not outweigh the conflict with CS Policy 1 and LP Policy EN1 and the development taken as a whole, therefore planning permission should be refused. This is an unusual position given the Council has on other cases approved significant residential development against the same housing land supply background. In addition, demonstrating a "very healthy supply of housing land" is meaningless if the makeup of that supply does not meet a specific newly arising unmet need in the borough or locally in terms of type, tenure, standards or size.
- 10.6 Whilst the Council may consider its housing land supply to exceed its need, that does not tell the full picture. The Preston, South Ribble and Lancashire City Deal was an agreement between the Government and four local partners; Lancashire County Council, Lancashire Enterprise Partnership, Preston City Council and South Ribble Borough Council, in September 2013.
- 10.7 Upon signing the deal the Councils committed to delivery of 17,420 new homes between 1st April 2014 and 31st March 2024 (1,742 dpa), against funding of

infrastructure from government. Currently there remains a significant shortfall in the number of dwellings that would have been expected to have been completed at this stage in the deal programme. Indeed on factoring in the respective anticipated delivery for each authority in 2023-2024, across the programme period only 13,117 dwellings (75%) will have been developed against this target (as per Preston and South Ribble's Annual Monitoring Reports). This is equivalent to a shortfall of 4,303 homes.

- 10.8 It is agreed with the LPA that the contribution to delivering market and affordable housing should attract substantial weight and it is our case that the proposals should be approved irrespective of the Council demonstrating a 5-year supply which is only a policy test; it is not a demonstration of meeting specific housing needs, as is the case here.
- 10.9 The LPA have resolved to attribute substantial weight to both market and affordable housing against the backdrop that the Council in their opinion can demonstrate a 5-year housing land supply. We agree that substantial positive weight should be applied, but that this should be applied individually to market and affordable given these are meeting different public needs. 5-year housing land supply is only a policy test, it is not a test of real housing needs, and in the context of housing supply needing to be maintained then market housing should continue to be given substantial weight in the balance. Core Strategy Strategic Objective 5 (SO 5) identifies the need to *"help make available and maintain within Central Lancashire a ready supply of residential development land over the plan period so as to help deliver sufficient new housing of appropriate types to meet future requirements".* We consider the proposals will help maintain the forward supply of homes to meet current and future needs.
- 10.10 The emerging Local Plan is in preparation with the underlying evidence base produced. On housing land supply matters, there is a memorandum of understanding (MOU) agreed between the three authorities as to the Central Lancashire minimum housing target as well as the apportioned percentage of this directed to each authority.
- 10.11 For Preston, the ECLLP proposes annual housing targets of 600dpa (2023-2027), 500dpa (2028-2032) and 400dpa (2033-2038). The emerging plan period has therefore already started and whilst it is not our case that it is the adopted requirement and therefore housing target, upon adoption this is the context to which housing land supply and delivery will be judged and, indeed, this is more reflective of real housing needs than the minimum standard method. If the MOU were the adopted targets, the Council's housing land supply based on its latest published figures for April 2023, would equate to **5.58 years supply**.
- 10.12 We consider that this is relevant background to considering the merits of the appeal proposals at this time. It is welcomed that the Council attribute such substantial weight even with their consideration of the current housing supply. There is a continued need to deliver housing in the current plan period and beyond into the new plan period. In addition, there is a national housing crisis and it is the government's priority to significantly boost the supply of housing.
- 10.13 In this context, we agree with the Council that market housing should be given **substantial weight** in the planning balance.

Affordable housing

- 10.14 The proposed affordable housing quantum is proposed to be increased to 40% thus exceeding the requirements of CS Policy 7. This is a positive response to the significant step-change increase in affordable housing needed in Preston recently evidenced through the Housing Need and Demand Assessment (HNDA, produced by Arc4 in 2022) and as reported by DLP in the published Central Lancashire Housing Study (2022).
- 10.15 Affordability throughout the plan period has not improved the lower quartile price to workplace earnings being around 4.8-5 at the start of the plan period and for 2023 it is currently at 4.91.
- 10.16 The HNDA (2022) states there is a **net annual need for 377 affordable homes** across Preston. The Preston area has the greatest affordable needs across the Central Lancashire area; in Chorley (113 dpa) and South Ribble (296 dpa). This is significantly higher than the CLCS requirement and any previously published housing needs assessment for the Preston area. For example, the CLCS identified a need for 46 affordable homes per annum in Preston, the SHMA (2017) identified 239 affordable homes per annum, and the Icen Housing Study (2020) identified a need for 250 homes per annum. Overall, the latest assessment of affordable housing needs in Preston is over 8 times higher than the CLCS requirement demonstrating the acute need for affordable homes now in Preston.

Changing affordable housing needs in Preston	
Core Strategy	46 dpa
SHMA (2017)	239 dpa
Icen Housing Study (2020)	250 dpa
HDNA (2022)	377 dpa

Table 8 – Changing affordable housing needs in Preston

- 10.17 There has been no single year where this level of need has been met and, in fact, the average gross affordable housing completions in Preston since 2004 is only 83 affordable homes per annum despite numerous studies commissioned by the authorities showing that affordable needs had worsened since the adoption of the CS. The average delivery of 83 dpa is likely to be lower when taking account of demolitions and Help to Buy losses to reach a net figure. Since the start of the CLCS plan period, the average has been 131 per annum. This delivery track record is significantly below what is now needed in Preston and so PCC should look highly favourably on windfall schemes which deliver new affordable homes in sustainable locations to assist PCC in trying to meet needs.
- 10.18 The latest evidence, compared with previous published housing assessments, shows an exacerbation of affordable needs. The Icen report (2020) stated that “*studies clearly*

demonstrate a **substantial** need for additional affordable housing and the Councils should **seek to maximise delivery where opportunities arise**".

- 10.19 The SHMA (GL Hearn, 2017 – **Appendix 20**), showed that median house prices in Preston increased by **162%** between 2000 and 2015. It also confirmed that there were 8,900 households in unsuitable housing (or without housing) in Central Lancashire and around half of these were in Preston. It noted that whilst Preston is one of the more affordable locations in the country, it does have a high affordable housing need which is influenced in part by its younger population.
- 10.20 In Broughton specifically, the SHMA (2017) showed it was one of the most expensive areas to live in with prices in 2015 ranging from £185,000 to £200,000. In 2022, the average price paid in the Broughton postcode area (PR3 5) was £365,676 as recorded by Land Registry. This is a significant increase on the 2015 figure, which shows a worsening affordability position in Broughton locally. An extract from the Arc4 presentation in September 2022 during a Developer's Forum hosted by Central Lancashire, shows that the north of Preston (which includes Broughton) is the least affordable area to live in.

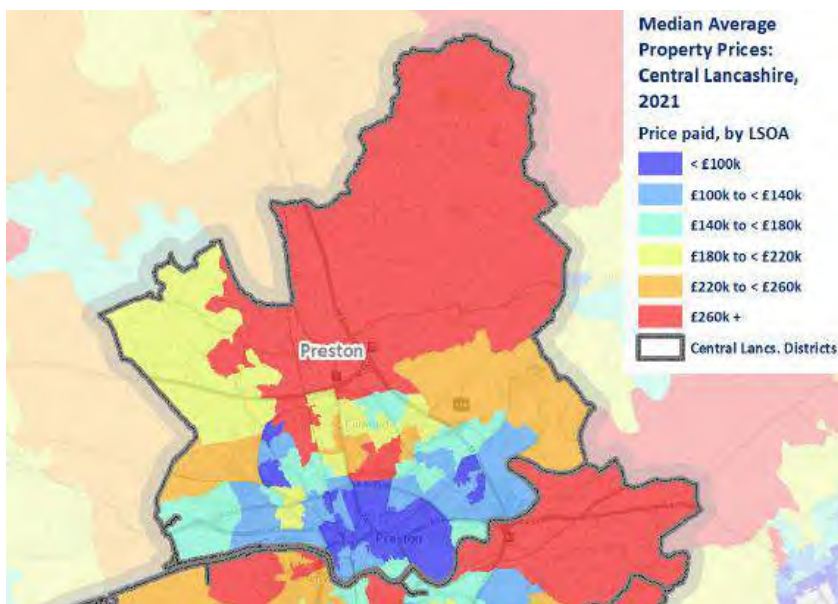


Figure 5 - Heat Map of affordability in Central Lancashire

- 10.21 In terms of tenure split, the latest evidence prepared by Arc4 (2022) has suggested a tenure split of 68% of all affordable products to be 'affordable rent' and 32% to be First Homes and affordable home ownership products (e.g., shared ownership). The DLP Housing Study (2022) commissioned by the Council also highlights that there is a specific need for affordable home ownership products which was evidenced in the 2021 household survey.
- 10.22 The Icen report (2020) (**Appendix 21**) suggested that providing affordable homes in Preston would make new housing more accessible to people on lower incomes in particular. It found a "clear and acute need for rented affordable housing from lower

income households" and that it was important that a supply of rented affordable housing is maintained to meet the needs of this group including those to which authorities have a statutory duty. The report states that analysis identified between 29% and 33% of the group of households unable to afford rental market housing fall in between the market value and 80% of the market value depending on location. It suggested that provision for supporting home ownership should focus on shared ownership homes. The report states that Councils should have regard to the housing report in negotiating affordable housing on schemes.

- 10.23 The SHMA report by GL Hearn (2017) found that provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households.
- 10.24 Based on the above evidence, and placing more weight on the latest published studies in 2022, the appellant reviewed their offer for affordable housing as brought forward as part of this development. The appeal proposals will commit as a planning obligation to deliver 40% of all units as affordable. The suggested tenure split of 68% affordable rent and 32% affordable home ownership (to include First Homes and Shared Ownership) will be agreed with the affordable housing officers as part of reserved matters to ensure affordable tenures on the site reflect the very latest needs in Broughton.
- 10.25 Further engagement with Arc4 who produced the 2022 evidence has allowed the Appellant to determine the exact affordable housing need in Broughton using the Local Housing Needs Assessment prepared for Broughton Parish. The evidence, which underpins the HDNA (2022) report confirms an annual net affordable need of 11 dwellings per annum, as set out in **Table 6** below.

	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom level-access/ other	2-bedroom level-access/ other	3 or more bedroom-level-access/ other	Total
Social/affordable rented		1	3	2	1	1			1	1	10
Affordable home ownership			1								1
TOTAL ANNUAL AFFORDABLE NEED		1	4	2	1	1			1	1	11

Table 9 – Arc4 Recommended Affordable Housing Mix for Broughton

- 10.26 To demonstrate the scale of affordable housing needed in Broughton, over a ten-year period, approximately **110 affordable dwellings** will be needed. This represents a 'local need' as allowed by Policy 1 of the CLCS.
- 10.27 To align with the local evidence, the appeal proposals will deliver a range of affordable dwelling sizes in response to the needs specific to Broughton above.
- 10.28 Considering all of the above it is clear that the affordable housing provided by the appeal proposals should be given no less than substantial weight in the planning balance. The Council may seek to temper the benefit of the increased provision of affordable housing to 40% of the scheme. However, the words of Inspector Young on

the appeal¹⁵ at Oxford Brookes University are particularly compelling and applicable to the situation in Preston:

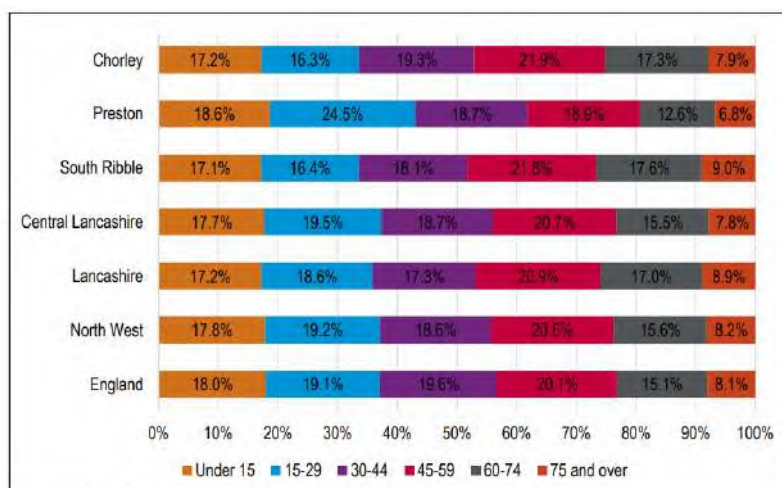
“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough [homes]. It is also evident that the seriousness of the...shortage in South Oxfordshire is having wider consequences for economic growth in the area.”

- 10.29 Core Strategic Objective 8 specifies an aim to “*significantly increase the supply of affordable and special needs housing particularly in places of greatest need such as in more rural areas*”. The proposals clearly respond to this.
- 10.30 In this context, the appellant has received an expression of interest in taking on the 40% affordable units on the scheme from local housing provider Heylo (**Appendix 22**). Heylo were established in 2014 and have grown to become one of the UK’s leading affordable housing providers, bringing the opportunity of owning a home within reach for millions of previously excluded buyers. Heylo have also worked with developer partners in the locality of Broughton and Preston so are familiar with the demand and need for affordable homes.
- 10.31 I consider that this affordable provision represents a very significant material consideration which weighs heavily in favour of granting planning permission, particularly in the context of Bolton having higher deprivation.
- 10.32 I give this element of the proposals **substantial positive weight** in the planning balance.

Over 55s Older People's Need

- 10.33 Updates to the NPPF in 2021 changed and widened the definition of what ‘Older people’ means to include those over or approaching retirement age including the active, newly retired to the very frail elderly. The definition also includes those whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.
- 10.34 Given the adopted Core Strategy and Local Plan were adopted before these changes to national policy they could not have taken account or reflected the full needs of older people now recognised which includes over 55s or those approaching retirement age.
- 10.35 Data from the ONS demonstrates how the demographic breakdown of Preston compares to the rest of Central Lancashire and the UK as a whole. The table below, taken from the ONS’s 2016 figures shows that Preston has a significant proportion of the population falling into the 60 and over category.

¹⁵ §13.101



Source: ONS 2016 mid-year population estimates

Figure 6 - Population age profile in Central Lancashire

10.36 Various studies have been undertaken within the Central Lancashire area, and specifically Preston, to understand the housing need for those over 55. The latest evidence prepared by Arc4 (2022) suggests there is a need for older person accommodation in both C2 and C3 use classes. In Preston, there is a need for **1,070 (between 2021-38) C3 dwellings** and **833 C2 dwellings/bed spaces**. Overall across Central Lancashire, this means a **total need of 106 dpa of older persons homes**.

10.37 The recent DLP Housing Study (2022) finds that the Central Lancashire population has seen the **largest growth in the older age group**¹⁶, with an increase of 40% since 2001, equivalent to approximately **20,000 additional people**. At the same time, the size of the working age (15-64) population has increased by only 7%. The study recognises the need to increase and diversify the supply of housing (including retirement homes) for older people with **1,903 more units** for older people required by 2038.

10.38 The Icen Housing Study (2020) concluded a similar picture. Table 7.4 of the report (**below – Table 7 of this Statement**) shows the projected change in older persons in Preston. The change in those over 65 is 34.4% whilst for under 65s it is only 3.1%.

	2016	2036	Change in population	% change
Under 65	120,983	124,687	3,704	3.1%
65-74	11,300	14,287	2,987	26.4%
75-84	6,873	9,371	2,498	36.3%
85+	2,662	4,353	1,691	63.5%
Total	141,818	152,698	10,880	7.7%
Total 65+	20,835	28,011	7,176	34.4%

Source: Demographic Projections

Table 10 - Projected population change for older people in Preston (2018-2038) taken from the Icen Housing Study 2020.

¹⁶ Specifically over 65s

10.39 Much of the projected increased change in households are those over 65s who are either one person (+23.6%) or couples (+47.9%) which suggests a need for smaller dwellings for over 55s which they can downsize into whilst releasing larger existing properties into the market. Table 8.2 (**Table 11 of this Statement**) of the Icen report shows the projected change in households across Central Lancashire.

	2018	2036	Change	% Change
One-person household (aged 65 and over)	19,571	24,195	4,623	23.6%
One-person household (aged under 65)	28,333	32,016	3,683	13.0%
Couple (aged 65 and over)	19,193	28,380	9,187	47.9%
Couple (aged under 65)	21,662	17,189	-4,474	-20.7%
A couple and one or more other adults: No dependent children	12,049	12,107	59	0.5%
Households with one dependent child	22,286	25,369	3,083	13.8%
Households with two dependent children	16,639	16,844	205	1.2%
Households with three dependent children	6,596	6,360	-236	-3.6%
Other households ²³	9,959	11,759	1,800	18.1%
TOTAL	156,288	174,219	17,930	11.5%
Total households with dependent children	45,520	48,573	3,052	6.7%

Source: Demographic Projections

Table 11 - Change in Household Types in Central Lancashire (2018-2038) taken from the Icen Housing Study 2020.

nearth problems amongst older people, there is likely to be an increased requirement for older people's housing options moving forward. One type referenced by the Icen report is 'age-restricted general market housing' for those aged 55 and over including the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services. Age-restricted general market housing is part of the appeal proposals.

10.41 Taking into account the current position noted above, Central Lancashire is projected to see notable increase in the older person population, with a total number of people aged over 65 projected to increase by 39% in the period up to 2036. This compares with an overall population growth of 6.5% and a decrease in the Under 65 population of 0.8%. Converting this into a figure, this represents a projected increase of **26,500 people** falling into the over 65's category. This change is evidenced in the table below:

	2016	2036	Change in population	% change
Under 65	120,983	124,687	3,704	3.1%
65-74	11,300	14,287	2,987	26.4%
75-84	6,873	9,371	2,498	36.3%
85+	2,662	4,353	1,691	63.5%
Total	141,818	152,698	10,880	7.7%
Total 65+	20,835	28,011	7,176	34.4%

Source: Demographic Projections

Table 12 - Demographic Projections – taken from the Central Lancashire Housing Study prepared by Icen, 2020

10.42 In addition to the evidenced demand for housing for older people as a result of the growing population, data from the Demographic Projections and Housing¹⁷ shows the types of housing that are required to accommodate the over 55s.

		Housing demand per 1,000 75+	Current supply	2018 demand	Current shortfall/ (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	62	1,043	589	-454	259	-196
	Leasehold	72	190	683	493	300	793
Housing with care	Rented	26	74	246	172	108	281
	Leasehold	22	0	211	211	93	304
Total (dwellings)		181	1,307	1,729	422	760	1,182
Care bedspaces		117	1,265	1,119	-146	492	346

Source: Derived from Demographic Projections and Housing LIN/HOSPR/EAC

Table 13 - Surplus and Demand of specialist Housing within Preston in the years 2018 and 2036 taken from the Central Lancashire Housing Study prepared by Icenj, 2020

10.44 It is noted that the categories in this evidence set only distinguish between 'housing with support' and 'housing with care', when in fact there are many different types of accommodation for older people. Icenj recognised this in the preparation of their assessment, and at para 7.10 of the report state that housing with support can include retirement and sheltered housing. For this analysis, the assessment is made on the basis of the needs for retirement housing (which falls under the 'housing with support' category).

10.45 On this basis, there is a clear shortfall of older people's retirement units across Preston. The demand is expected to increase because of the ageing population and this shortfall will also increase in line with the rising demand without housing proposals such as this coming forward.

10.46 It is noted that within the Committee Report, PCC draw attention to a planning permission (Reference: 06/2019/1347) relating to a site within the settlement boundary of Broughton. The scheme was subject to a S73 application (Reference: 06/2020/1144) which amended the typology to over 55s accommodation. It is understood that this scheme will become operational imminently.

10.47 Whilst this scheme makes a contribution to an identified need, this does not mean that PCC should resist further provision of this housing typology on sustainably located sites which the Committee Report appears to purport to as an approach. PCC should instead be endeavouring to identify further opportunities to establish a pipeline of such accommodation to meet the identified growth in need.

10.48 The projections indicate that demand for this typology will only increase. Furthermore, that particular scheme is proposed to cater for affordable care needs in conjunction with a registered provider. That does not therefore address the imbalance of need for smaller properties for retirement purposes which along with meeting the direct need

¹⁷ LIN/HOSPR/EAC

apparent, would also serve to free up larger homes within the local housing market facilitating downsizing.

10.49 Locally, the Broughton Parish Census data for 2011 and 2021 (ONS Area reference: Preston 002B) highlights the changes which have occurred through the current plan period in relation to the local demographic, economic inactivity (as a sign of an aging population) and tenure type availability. It is worth noting that Broughton parish area extends beyond the M55 into part of Preston city where other development has taken place.

	Census 2011	Census 2021	% increase/decrease
Households (total)	737	957	+29.9%
65 years and over	469	539	+14.9%
Population (total)	1722	2466	+43.2%
Economically inactive	366	703	+92.0%
Household size (1 person)	199	215	+8.0%
Households (1 bedroom)	39	35	-10.3%
Households (2+ bedrooms)	697	921	+32.1%
Home ownership	832	641	-33.0%
Social rent	48	42	-12.5%
Private rent	76	40	-47.4%

Table 14 – Broughton household composition and tenure

10.50 Most strongly is a picture of a significant increase in those not economically active (+92%), an increase in the older population (+14.9%), a decreased amount of home ownership (-33%) and a decreased amount of rental properties (-47.4%). There is also a 8% increase in the number of one person households since 2011 despite the level of larger dwellings increasing significantly; this suggests an opportunity locally in Broughton for older residents to 'down-size' and help release larger properties into the market for growing families. Recent developments adjoining the Broughton settlement have increased the type of housing available in the local market, however it is clear there has been a focus on larger family homes which have not remedied the situation in providing choice of smaller dwellings to meet the needs of an ageing population.

	2011	2021	% change
1 bed	39	35	-11%
2 bed	112	127	+13%
3 bed	339	397	+17%
4 or more beds	246	397	+60%

Table 15 – Broughton housing availability typologies

10.51 The appellant is committed to addressing the identified need within Broughton, Preston and the Central Lancashire Area and therefore seeks to specifically provide 10% of the

51 dwellings as accommodation for the over 55s. The dwellings would be restricted for sale to over 55s in perpetuity.

- 10.52 In addition, an expression of interest from Liberty Living (**Appendix 23**) who are part of a wider group of companies of Liberty Properties that have amassed an experience over the past 35+ years in development residential for retirement, extra care and care home sectors. The letter confirms a “*keen interest*” in taking on the over 55s units. The letter refers to evidence from Lancashire County Council’s ‘Housing with Care and Support Strategy 2018-2025’ with a significant need for new modern apartment or housing-led development to facilitate independent living. It outlines there is a current older person housing need of **165 dwellings** in Preston.
- 10.53 The location and design of these units would be agreed at Reserved Matters Stage, but the commitment to provision is to be secured via a planning obligation or condition.
- 10.54 The Core Strategy and the Preston Local Plan did not seek to meet a specific number of older people homes in its policies. Para 62 of the NPPF requires LPA’s that “*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*”. The appeal proposals are in response to there being an evidenced newly arising (and worsening) need in Broughton and the borough.
- 10.55 Taking all of the evidence together, we therefore attribute **substantial weight** to the provision of over 55s housing in a settlement which has been demonstrated to be suitable and a sustainable location for this type of housing.

Accessible and adaptable dwellings

- 10.56 The Arc4 HNSA (2022) report identifies a need for **4% of new homes** in Preston to be M4(3) wheelchair accessible with all other properties to be M4(2) standard. The Icen Housing Study (2020) considered that it would be sensible to design housing so that it can be adapted to a household’s changing needs over time and recommended a third of all new housing is delivered to M4(2) standards; these homes are also considered ‘Homes for Life’. The study also identified a projected increase in the population in Preston with a range of disabilities (+44.1% with dementia and +40.1% with mobility problems). The 2020 study also found an **unmet need for wheelchair user dwellings** in Central Lancashire of around **3% of households**, equivalent to 1,100 homes (in Central Lancashire) or **421 homes** in Preston.
- 10.57 The Core Strategy and the Preston Local Plan did not seek to meet a specific number of adaptable homes in its policies. Para 62 of the NPPF requires LPA’s that “*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*”. The appeal proposals are in response to there being an evidenced unmet need of **421 homes** in Preston of wheelchair user dwellings and a need for **4% of homes** to be M4(3) wheelchair accessible.
- 10.58 PCC’s position as set out in the Committee Report does not disagree in respect of need for this type of accommodation, but they state as follows in respect of location... “*The entrance to the application site is located 350m south of the centre of Broughton*

village, which contains a limited selection of services and facilities. Bus stops are located 180m north and 275m south of the site which at their peak, offer half hourly bus services south to Preston city centre and hourly buses north to Lancaster and Morecambe". This statement is worded to align with the LPA's position in respect of the sustainability of Broughton as a settlement. We will not rehearse the Appellant's position regarding the LPA's stance in this respect (see Section 9 of this Statement), but it is salient to reiterate that preceding appeal decisions relating to recent development proposals within and surrounding Broughton have clearly established the LPA's stance in this respect to be unsubstantiated.

10.59 In summary, the proposed development offer will assist with directly meeting these needs in a location that has been deemed sustainable, close to services, facilities and public transport, meaning those with disabilities do not need to travel far. The provision of higher accessibility standards is feasible as the site is generally flat with level access to good quality footpaths on Garstang Road and no difficult inclines.

10.60 We give this benefit **substantial weight** in the planning balance.

BAME Households

10.61 The Arc4 HNDA (2022) report states there is a need in Preston for **7.5% of new homes** to be larger with 4 bedrooms, and **1.1%** to have 5 or more bedrooms to meet the needs of identified larger families, particularly those from the Asian community. The proposed development will provide a range of dwelling sizes, including larger homes, to assist with meeting the needs of these households.

10.62 We give this benefit **substantial weight** in the planning balance.

Open Space

10.63 The appeal proposals provide a significant proportion of open space and green infrastructure. The policy requirement for 51 dwellings to provide open space¹⁸ is 685 sqm and the appeal proposal provision is 10,700 sqm (see parameter plan). This is over 15 times what the minimum requirement is. A recent survey undertaken by the parish council showed that the provision of more open space is a priority for the community. The Council also agreed the proposed open space is "sizeable".

10.64 The appellant gives this benefit **moderate positive weight** in the balance.

Biodiversity Net Gain

10.65 The appeal proposals have been assessed using the most up-to-date Biodiversity Metric 4.0 Calculation Tool. The proposals provide a **+48.94%** habitat gain and **+9.76%** hedgerow gain as evidenced by ERAP (**Appendix 24**). There is no adopted policy requirement to provide more than 0% and the 10% requirement envisaged by Section 98 of the Environment Act 2021 has yet to be commenced. The Council gave this limited weight in the balance on the basis the proposals were not supported by an up-

¹⁸ Specifically amenity greenspace and provision for children and young people

to-date biodiversity calculation. This has now been provided and is well in excess of the net gain achieved on the original application using the 2.0 Biodiversity Metric.

10.66 The appellant gives this benefit **significant weight** in the balance.

Bus stop infrastructure

10.67 The appeal proposals will provide bus stop upgrades in the locality. This will benefit the wider public as well as residents on the appeal scheme and help to improve the attractiveness of using sustainable modes of transport.

10.68 The appellant gives this benefit **moderate weight** in the balance.

11. The Planning Balance

11.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that determination must be made in accordance with the development plan unless material considerations indicate otherwise.

11.2 PCC consider that the extent of the harm due to conflict to the development should outweigh the wide reaching benefits of this sustainable development but do not demonstrate what harm actually arises.

11.3 It is in fact unclear what specifically PCC are suggesting the actual harm and impact is to refuse planning permission. They have reached the decision to refuse planning permission in accordance with the Officers report. This states:

The adverse impact of this development is a fundamental conflict with the development plan spatial strategy for Central Lancashire. This strategy seeks to direct development to the most sustainable higher order centres and minimise development in the lower order centres such as Broughton. (page 30)

11.4 We disagree with the perceived fundamental conflict suggested by PCC. The Appellant considers that the appeal proposals are in accordance with the adopted development plan as a whole. The appeal site and specific proposals respond positively due to the sustainability of the location and the accrued economic, social and environmental benefits. Here it must also be recognised that there is a lack of technical or developmental harm caused by the proposals as is common ground.

11.5 It is common ground that the statutory status of the development plan should be the starting point for decision making in line with para 12 of the Framework.

11.6 Policy 1 is not as restrictive as the Council allege and allows for exceptions which apply to the appeal proposals as well as a balanced judgement on the specific site merits, settlement and development characteristics. In this case there is no landscape or character harm or adverse impacts on any other matter. Statutory consultation responses confirm that technical matters *inter alia* landscape, surface water drainage, foul drainage, energy and heritage are all considered to be acceptable, or capable of being controlled by an appropriately worded planning conditions and/or planning obligation.

11.7 The conflicts which arise with limited areas of the most relevant policies of the development plan have been assessed as part of our case. The material considerations are compelling. Circumstantial evidence in relation to the site, the settlement and wider spatial objectives all contribute to the requirement to exercise a wider reaching consideration of whether the proposals accord with most relevant policies or not.

11.8 The Appellant firmly considers the proposals represent sustainable development. We consider that the social, economic and environmental benefits created by sustainable

development are more than capable of outweighing any perceived policy conflicts under a 'flat balance'.

Benefits	Weight	Impact	Weight
Market Housing – up to 31 dwellings	Substantial Weight	Conflict with PLP Policy EN1 & RES1	Limited weight
40% Affordable Housing – up to 20 dwellings	Substantial Weight		
Special needs accommodation (10% Over 55s / BAME / 4% M4(3) Accessible Dwellings)	Substantial Weight		
Biodiversity Net Gain – Proposed development achieves +48.94% habitat gain and + 9.76% hedgerow gain	Significant Weight		
Upgrades to bus stops – 2 bus stop upgrades on Garstang Road	Moderate Weight		
Energy efficiency & EVC Points	Limited Weight		
Open Space – 1.62 hectares	Moderate Weight		

Table 16 – Appellant Planning Balance Assessment

- 11.9 The Appellant is of the view that even with the weighting set out by PCC, this still amounts to a tipping of the planning balance in favour of granting permission. However, it is also the Appellant's contention that there is a clear undervaluing of certain aspects in PCC's weighting, particularly in respect of provision of specialised needs accommodation set out in up-to-date studies commissioned and published by the Council.
- 11.10 This Statement of Case has set out substantial and irrefutable evidence in respect of housing need within the borough. Satisfying a separate policy test to determine housing land supply does not necessarily equate to the delivery of specific housing typologies and tenures to meet local need that have newly arisen (or worsened) since the adoption of the Core Strategy.
- 11.11 The proposed development, whilst in outline, offers an opportunity to deliver such specific, targeted typologies and tenures in a highly sustainable location in close proximity to the city of Preston. The appellant is committed to entering into a S106 Agreement with the LPA to secure the proposed housing. Further detail would be agreed through the negotiation of the S106 and at Reserved Matters stage.

- 11.12 Taken as a whole, the proposed development clearly constitutes 'sustainable development' and delivers on all three strands of economic, social and environmental objectives.
- 11.13 In accordance with paragraph 11 of the Framework, the Appellant will invite that the Appeal is allowed, and permission granted, subject to conditions and a s.106 planning obligation.

12. Planning Conditions and S106 Obligations

Planning Conditions

- 12.1 The parties will seek to reach agreement on other planning conditions in advance of the Inquiry. It is considered that the conditions suggested by PCC in respect of the first application on this site, when it was originally recommended for approval, should be the starting point for these discussions.

S106 Obligations

- 12.2 A draft of this will be discussed with PCC in advance of the Inquiry.

13. Documents List

13.1 The below list is a comprehensive list of all documents associated with / relevant to this Appeal submission.

NAME OF DOCUMENT	REFERENCE	DATE OF DOCUMENT
SECTION A – APPLICATION DOCUMENTS		
January 2023		
Application Forms	PP-11813491	January 2023
Application Cover Letter		January 2023
Application Location Plan	Location Plan	December 2020
Parameter Plan	PARAM-01	August 2021
Access Plans		
Proposed Access Plan	10535/5501/001-A	May 2021
Proposed Cycle and Pedestrian Connection	10535/5501/001/D	May 2021
Technical Documents		
Agricultural Land Classification Report	SES/HSL/GR/#1	April 2021
Biodiversity Net Gain Report	2021-104b	July 2021
Ecological Survey & Assessment	2021-104 Rev3	December 2022
Flood Risk Assessment & Drainage Strategy	SHF.1671.006.HY.R.001.B	July 2021
Heritage Statement		June 2021
Transport Statement	TS01B	December 2022
Landscape and Visual Appraisal	403.05627.00012	July 2021
Phase 1 Desk Study Assessment Report	CM/C4755/10052	April 2021
Planning Statement		January 2023
Statement of Community Involvement	sa/pks/4957	July 2021
Arboricultural Report	AWA3718	July 2021
SECTION B – UPDATED DOCUMENTS RELATING TO THE APPLICATION		
February 2023		
Updated Drainage Strategy	SHF.1671.006.HY.LT.001.A	February 2023
Updated Parameter Plan	PARAM-02	February 2023
Updated Transport Statement	TS01C	February 2023
SECTION C – CORE DOCUMENTS		
LPA Committee Report (Ref: 06/2023/0030)	06/2023/0030	March 2023
Central Lancashire Core Strategy	CLCS	July 2012

NAME OF DOCUMENT	REFERENCE	DATE OF DOCUMENT
Preston Local Plan	PLP	July 2015
Broughton-in-Amounderness Neighbourhood Plan	BNP	August 2018
Central Lancashire Design Guide SPD		October 2012
Central Lancashire Affordable Housing SPD		October 2012
Central Lancashire Open Space and Playing Pitch SPD		May 2014
Central Lancashire Employment Skills SPD		September 2017
National Planning Policy Framework	NPPF	September 2023
National Planning Practice Guidance	NPPG	Various
Emerging Central Lancashire Local Plan	ECLLP	December 2022
Central Lancashire Strategic Housing Market Assessment (SHMA) – GL Hearn	2017 SHMA	September 2017
Central Lancashire Housing Study – Icenii	2020 CLHS	March 2020
Preston City Council Housing Need and Demand Assessment – Arc4	2022 HNDA	December 2022
Central Lancashire Housing Study (DLP / Edge Analytics)	2022 CLHS	September 2022
06/2021/1104 Planning Committee Report		January 2023
06/2023/0030 Policy Compliance Matrix	Policy Matrix	October 2023
Central Lancashire Core Strategy Inspectors Report (PINS)	CLCS Inspector's Report	June 2012
SECTION D – RELEVANT APPEAL DECISIONS		
Sandy Gate Lane Appeal Decision 3179105	Sandy Gate Lane Appeal	April 2018
Key Fold Farm Appeal Decision 3179177	Key Fold Lane Appeal	April 2018
Alford Appeal decision 3278196	Alford Appeal	January 2022
Benger Appeal Decision 3285458	Benger Appeal	June 2022
Clifton Appeal Decision 3211229	Clifton Appeal	December 2019
Land off D'Urton Lane 3296374	D'Urton Appeal	January 2023
SECTION E – RELEVANT CASE LAW		
Craighead in Tesco Stores Ltd. v Dundee City Council [2012] UKSC 13; [2012] 2 P. & C.R. 9	Craighead Judgement	March 2012
Chichester DC v SoSHCLG [2019] EWCA Civ 1640	Chichester Judgement	October 2019

APPENDICES

APPENDIX 1:

06/2023/0030 – Decision Notice

Town and Country Planning Act 1990

REFUSAL OF PLANNING PERMISSION

Application no: **06/2023/0030**



Agent:

Rachel White,
NJL Consulting
Northspring
6th Floor
70 Spring Gardens
Manchester
M2 2BQ

Applicant:

Hollins Strategic Land LLP
C/O Agent

Decision date: 04-Apr-2023

Valid date: 06-Jan-2023

Development proposed:

Outline planning application seeking approval for access only for residential development for up to 51 no. dwellings with associated works (all other matters reserved)

at:

Land west of Garstang Road, Broughton, Preston, PR3 5JA

Preston City Council hereby give notice that **PERMISSION HAS BEEN REFUSED** for the carrying out of the above development for the following reasons:

1. The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.

N Somers

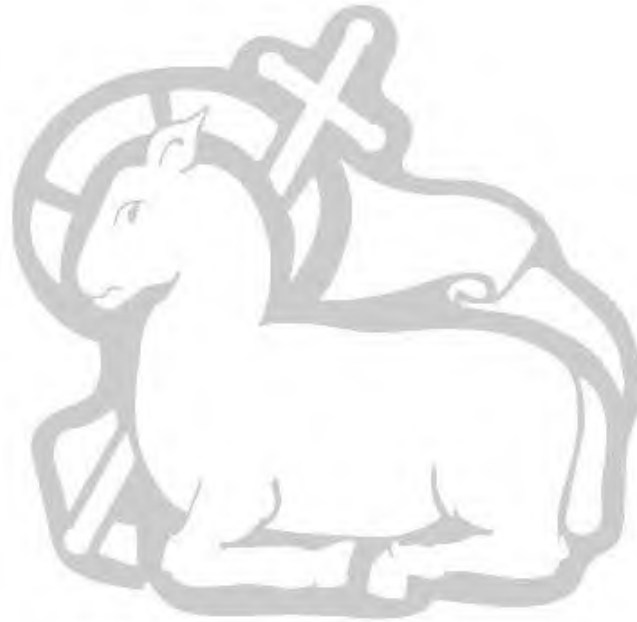
Assistant Director (Head of Development Management and Building Control)

Development & Housing Directorate
Preston City Council
Town Hall
Lancaster Road
Preston
PR1 2RL

INFORMATIVE:

Compliance with paragraph 38 of the National Planning Policy Framework

The Local Planning Authority has acted positively and proactively in determining this application, in accordance with paragraph 38 of the National Planning Policy Framework, by assessing the proposal against relevant planning policies and all material considerations, identifying matters of concern with the proposal and discussing those with the applicant. However, the issues identified are considered to be so fundamental that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible.



Preston
City Council

APPEAL PROCEDURE FOR PUBLIC INQUIRES

Appellants seeking an inquiry are asked to give the Planning Inspectorate and Local Planning Authority at least 10 days' notice that they intend to submit an inquiry appeal.

Appellants should send an email to the Local Planning Authority's email devcon@preston.gov.uk and also to the Planning Inspectorate's email inquiryappeals@planninginspectorate.gov.uk at least 10 working days before submitting a planning appeal they wish to follow the inquiry procedure.

In the notification, appellants should include:

- Appellant name
- The Local Planning Authority that the appeal will be against
- Reason for appeal
- Site address
- Description of development
- Planning application number
- Likely submission date of appeal
- Proposed duration of inquiry in days

A template can be found at:

<https://www.gov.uk/government/publications/notification-of-intention-to-submit-an-appeal>

For clarity, this only applies to planning appeals that follow the inquiry procedure.



NOTE:

Appeals to The Secretary Of State

Planning Applications

You have the right to appeal against the Local Planning Authority's refusal of planning permission or grant of permission subject to conditions. You may appeal to the Secretary of State for Levelling Up, Housing and Communities under Section 78 of the Town and Country Planning Act 1990. For further information on how to make an appeal please visit the Planning Portal website

www.planningportal.co.uk

If you want to appeal, then you must do so within six months of the date of the enclosed notice. Please note, only the applicant possesses the right to appeal.

If your application is for a minor commercial development (shop front), you must appeal within 12 weeks.

If your application is for a householder development, you must appeal within 12 weeks.

The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions which it imposed.

The Secretary of State has the power to allow a longer period for the giving of a notice of appeal but he will not normally be prepared to exercise this power unless there are special circumstances which excuse the delay in giving notice of appeal.

In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based its decision on a direction by him.

Purchase Notices

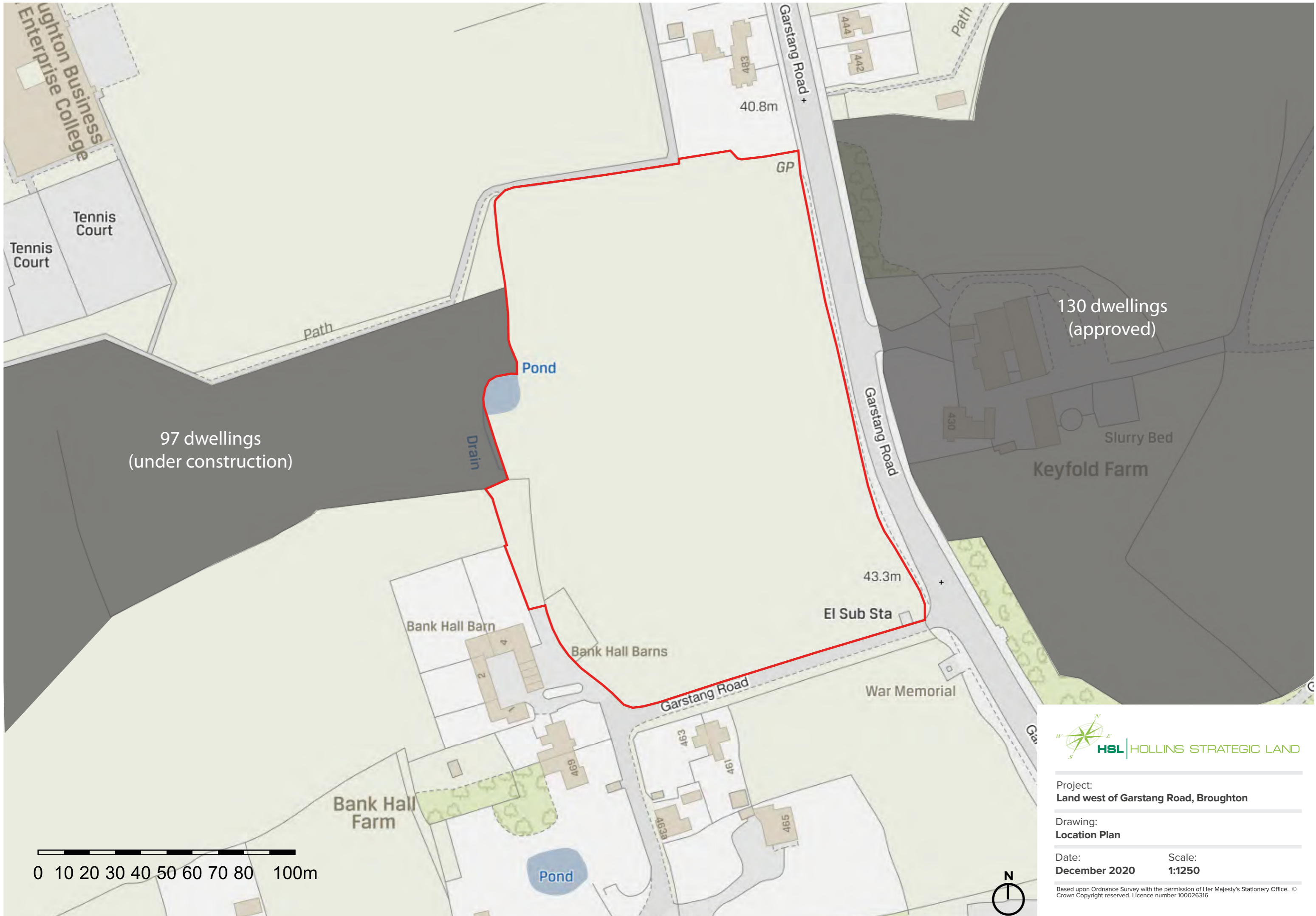
Planning Applications

If either the local planning authority or the Secretary of State for Communities and Local Government refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor can he render the land capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the City Council. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

APPENDIX 2:

06/2023/0030 – Site Location Plan



Project:
Land west of Garstang Road, Broughton

Drawing:
Location Plan

Date: **December 2020** Scale: **1:1250**

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APPENDIX 3:

06/2021/1104 – Planning Committee Report

Reporting to Planning Committee Meeting to be held on: 6th January 2022	Electoral Ward Affected Preston Rural East
Report submitted by: Director of Development and Housing	
Application Number: 06/2021/1104	

1 Summary

1.1 Land west of Garstang Road, Broughton, Preston, PR3 5JA

Outline planning application seeking approval for access only for residential development for up to 51 no. dwellings with associated works (all other matters reserved)

Applicant Hollins Strategic Land LLP

Agent Sedgwick Associates

Case Officer James Mercer

2 Decision recommended

Refusal for the reason set out in paragraph 2.1

2.1 Reasons for Refusal

1. The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood Development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.

3 Information

3.1 Location

The application site is located to the west of Garstang Road, north of Bank Hall Farm and south of Broughton High School playing fields. The Guild Wheel cycle route passing along the northern boundary of the site, set between the application site and the school playing fields. To the east, the site is bound by Bank Hall Barn, open fields and a site with planning permission for 97 dwellings (06/2016/0736). The application site extends to approximately 2.57 hectares and is located within the open countryside and Area of Separation, as defined by the Policies Map contained within the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies). The site also falls within the Broughton Neighbourhood Development Plan area.

3.2 Proposal

The application seeks outline planning permission for up to 51no. dwellings, and associated works. Vehicular and pedestrian access would be taken from Garstang Road, with further pedestrian and cycle connections to the Guild Wheel to the north. Whilst the application is in outline and layout is a reserved matter, an indicative site plan has been provided, within the Design and Access Statement, which shows how the site could be set out.

Following concern being raised over the impact of the proposal on nearby listed buildings and a request for matters relating to scale, design and layout to be submitted, a Parameters Plan was provided in lieu. The plan sets out the area of site which would be developed with residential development covering 2.69 hectares to the north of the site with areas of public open space and landscaping covering 1.62 hectares to the east, south and southwest, providing a buffer between the site and the nearby heritage assets.

3.3 Relevant planning history

Whilst the site itself has no planning history, applications within the vicinity which are of relevance are as follows:

Land off Sandy Gate Lane

06/2016/0736 – Outline planning application for up to 97no. dwellings (access applied for only) – Refused May 2017. Allowed on appeal April 2018.

Land previously known as Key Fold Farm, Garstang Road

06/2017/0097 – Outline application for residential development for up to 130 houses with access considered – Refused June 2017. Allowed on Appeal April 2018.

3.4 Planning Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The Development plan comprises:

Central Lancashire Core Strategy

- Policy 1 – Locating growth
- Policy 3 – Travel
- Policy 4 – Housing Delivery
- Policy 5 – Housing Density
- Policy 6 – Housing Quality
- Policy 7 – Affordable and Special Needs Housing
- Policy 14 – Education
- Policy 16 – Heritage Assets
- Policy 17 – Design of new buildings
- Policy 18 – Green infrastructure
- Policy 19 – Areas of Separation and Major Open Space
- Policy 21 – Landscape character areas
- Policy 22 – Biodiversity and Geodiversity
- Policy 26 – Crime and community safety
- Policy 27 – Sustainable Resources and New Developments
- Policy 29 – Water management
- Policy 30 – Air quality
- Policy 31 – Agricultural Land

Preston Local Plan 2012-26 (Site Allocations and Development Management Policies)

- Policy ST1 – Parking standards
- Policy ST2 – General transport considerations
- Policy EN1 – Development in the open countryside
- Policy EN2 – Protection and enhancement of green infrastructure
- Policy EN4 – Areas of Separation
- Policy EN7 – Land Quality
- Policy EN8 – Development and Heritage Assets
- Policy EN9 – Design of new development
- Policy EN10 – Biodiversity and Nature Conservation
- Policy EN11 – Species Protection
- Policy HS3 – Green Infrastructure in New Housing Developments

Broughton Neighbourhood Development Plan

- Policy NE2 – Visual Impact of New Development
- Policy RES1 – Broughton Village – Housing Development Sites as an extension to the defined settlement boundary.
- Policy RES2 – Broughton Village Housing Mix
- Policy NE3 – Drainage

Other Material Considerations:

Central Lancashire Supplementary Planning Documents (SPD)

- Design Guide
- Affordable Housing
- Employment Skills

Open Space and Playing Pitch Strategy

National Planning Policy Guidance

National Planning Policy Framework (The Framework)

National Planning Practice Guidance (NPPG)

National Planning Policy for Waste

National Design Guide

Other Documents

The Conservation of Habitats and Species Regulations 2017

The Wildlife and Countryside Act 1981 (as amended)

Community Infrastructure Levy (CIL) Regulations 2010 (as amended)

3.5 **Consultation responses**

United Utilities: The site overlies the sandstone rock in Groundwater Source Protection Zone 2 & 3; an aquifer, abstracted at depth for public drinking water supply at nearby Broughton boreholes, northwest and southwest of the development. The applicant should follow best practice on their use and storage of fuels, oils and chemicals, to remove the risk of causing pollution during construction. Attention is drawn to advice in The Environment Agency's Approach to Groundwater Protection. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way. Conditions securing a surface water drainage scheme and that foul and surface water to be drained to separate systems should be secured.

Natural England: No comments to make on this application. The Local Planning Authority is advised to obtain specialist ecological or other environmental advice when determining the environmental impacts of the proposed development.

Lead Local Flood Authority (LLFA): No objection subject to conditions requiring: a final sustainable drainage scheme; a construction phase surface water management plan; operation and maintenance plan and verification report of constructed sustainable drainage system. It is also suggested that should planning permission be granted an informative is attached to confirm a planning permission does not grant permission to connect to the culverted watercourse.

County Highways: Initially raised objection as a safe and suitable access to the site had not been demonstrated nor had sufficient detail been provided to show the cumulative impact on the A6 would not be severe. Following the submission of additional information, they identified the need to include 'radii' to the northern access on to the cycle route and removal of hedgerows either side to provide inter-visibility with the Guild Wheel route and the provision of street lighting and drainage to internal cycle routes. In addition, the proposed bus stop upgrades proposed by the applicant would be required. Subject to alteration mentioned they would have no objection subject to the inclusion of appropriate highways conditions.

Highways England: No objection subject to a condition requiring implementation of the submitted travel plan. They do, however, recommend that the cumulative impact on the

M55 Junction 1 of this development along with other approved developments be carefully considered by the Local Planning Authority when considering the application.

County Education: Object to the planning application unless financial contributions for 19 primary school places and 8 secondary school places are secured, based on the assumption that all 51no. dwellings would have 4 bedrooms. Should this not be the case a reassessment will be required at reserved matters stage and could result in a reduced claim for school places.

Greater Manchester Ecology Unit (GMEU): No objection subject to conditions requiring the submission of tree protection measures, details of any external lighting, no vegetation clearance during bird nesting season, the development to be carried out in accordance with Amphibian Reasonable Avoidance Measures and the submission of biodiversity enhancement measures.

Environmental Health: No objection, further to the recommendations of the Phase 1 Desk Study Assessment, an intrusive Phase 2 Geo-Environmental Site Investigation should be undertaken and secured by condition, and electric vehicle charging points and a Construction Environmental Management Plan should be secured by condition.

Parks and Horticulture Services (Landscape): With reference to the submitted Design and Access Statement (DAS), ecology report and heritage statement, the following objectives should be achieved:

- Respecting the setting of the Grade II listed building to the south of the site;
- delivering significant biodiversity enhancements;
- providing public open space;
- accommodating sustainable urban drainage;
- retention of existing trees & hedgerow on all boundaries as far as possible (other than those affected by access); and
- providing connectivity to the Guild Wheel.

The rural edge/leafy character of Broughton should be protected by protecting and widening the existing green frontage of the site, which would also respect the setting of heritage assets and protect the value of the land as a wildlife corridor. The open space at the southern edge of the site will successfully separate the site from existing buildings. The features within the public open space should complement the existing facilities on the King George V playing fields to the north east of the site. The need for the community pavilion is questioned. A detailed soft and hard landscaping scheme will be required at reserved matters stage should permission be granted.

Waste Management: No objection, however the Council do not send waste crew or vehicles to collect from private land, private roads or driveways. Occupiers should not have to move waste containers a distance of more than 25 metres. A Waste Management Plan should be submitted with any reserved matters application to demonstrate that the Council's largest 8x4 chassis refuse vehicle can adequately and safely traverse and turn within the proposed development.

Broughton Parish Council: Object to the proposed development. The comments received can be summarised as follows:

- The site is not designated in the Broughton Neighbourhood Plan;
- The site is within the current “area of separation” – an area that Preston City Council have submitted for the revised Central Lancashire Core Strategy to be retained;
- The site crosses the Guild Wheel/Garstang Road cycle track;
- The proposed development will add traffic to Garstang Road that was narrowed and had a 20mph speed limit (currently unenforceable) when the bypass was built. The village centre has major parking issues already, and this will only exacerbate the issues;
- The site is open countryside;
- The adjoining sites off Sandy Gate Lane and opposite on Keyfold Farm were only granted planning permission on appeal as Preston City Council could not demonstrate a 5 year land supply – which they now can.

Right Honourable Ben Wallace MP: Objects to the proposed development, details of which can be summarised as follows:

- The site is contrary to the Local Plan and the Broughton Neighbourhood Plan;
- The site is not allocated for development;
- The site is within the open countryside and Area of Separation; and
- The open countryside/Area of Separation designation is important to ensuring the character of the village is maintained and not subsumed within north Preston.

Publicity: 10 letters of objection have been received, details of which can be summarised as follows:

- The proposal is contrary to the Broughton Neighbourhood Plan, Local Plan and Core Strategy;
- The development would remove the last open space between Broughton and Fulwood;
- No need for more housing in Broughton;
- Loss of hedgerows and subsequent impact on wildlife;
- Impact on highway safety, in particular users of the Guild Wheel;
- Increase in traffic generation along Garstang Road;
- Impact on nearby heritage assets;
- The proposal fails to take into account the drainage culvert on the site;
- Detrimental impact on residential and visual amenity; and
- Lack of amenities within the village to cater for more residents.

3.6 Analysis

Principle of Proposal

Core Strategy Policy 1 seeks to concentrate growth and investment on well-located brownfield sites in Preston and adjacent to the Key Service Centres. The policy further states that in other places, including smaller villages and substantially built up frontages, development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet a local need.

The application proposes up to 51no. dwellings on a greenfield site outside of the village boundary of Broughton. The application site is not a well located brownfield site, an identified strategic location, within a Key Service Centre or main urban area. Other places, being open countryside locations, such as the application site, are at the bottom of the hierarchy, where Policy 1(f) directs development to be typically small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional needs for a larger scale redevelopment scheme. The application does not propose any of the development listed in Policy 1(f) therefore it is considered the development would be contrary to Policy 1 of the Core Strategy.

Policy EN1 of the Local Plan, along with Core Strategy Policy 1 forms the spatial strategy for growth in Preston. The policy, along with the accompanying Rural Development SPD seek to direct development towards appropriate locations by protecting areas of open countryside from development which fails to meet the criteria in the policy i.e. that which is needed for the purposes of agriculture or forestry or other appropriate rural use, the re-use or re-habitation of existing buildings or infilling within small groups of buildings within smaller rural settlements. Policy EN1 also permits development which accords with either Policy HS4 or HS5 of the Local Plan. A consequence of applying the spatial strategy in Policy 1 of the Core Strategy and Policy EN1 of the Local Plan is that by restricting development in the open countryside to these exceptions the open and rural character of the open countryside is maintained. Whilst this is a consequence of applying the spatial strategy, it is not the purpose of it, the spatial strategy does not seek to protect the open countryside for its own sake.

The location of development is not within a village or settlement boundary and therefore Policy EN1 of the Local Plan applies. Policy EN1 of the Local Plan states that in locations such as those relevant to the application site, development will be limited to that needed for agricultural or forestry purposes (including proposals which help diversify the rural economy), that which is infill, or the re-use or re-habitation of existing buildings. The proposal fails to comply with any of the exceptions stated in Policy EN1, and is not a proposal which accords with Policy HS4 or Policy HS5, as such the proposed application fails to comply with Policy EN1.

Policy RES1 of the Broughton Neighbourhood Development Plan allocates small-scale housing developments at three specific sites and states that “other proposed housing developments within the designated Open Countryside will be heavily restricted in accordance with Central Lancashire Core Strategy Policies 1 and 19 and Preston Local Plan Policies EN1 and EN4”.

The site is not allocated within the Broughton Neighbourhood Development Plan for housing development. As stated above the proposed development is not the type of development permissible under Core Strategy Policy 1 or Local Plan Policy EN1 and so therefore, the development conflicts with Policy RES1 of the Broughton Neighbourhood Development Plan.

Policy 31 of the Core Strategy also seeks to protect the best and most versatile agricultural land (Grades 1, 2 and 3a) to achieve the full potential of the soil. The application site is Grade 3b and would not lead to the loss of the highest value of agricultural land. The

application therefore would not conflict with Policy 31 of the Core Strategy.

Conclusion on principle of proposal

The proposed development does not comply with Core Strategy Policy 1, Local Plan Policy EN1 and Broughton Neighbourhood Development Plan Policy RES1. A consequence of applying the spatial strategy in Policy 1 of the Core Strategy and Policy EN1 of the Local Plan ensures that by restricting development in the open countryside to the exceptions permitted by those policies, the open and rural character of the open countryside is maintained. Whilst this is a consequence of applying the spatial strategy, it is not the purpose of it, the spatial strategy does not seek to protect the open countryside for its own sake, in that appropriate development is permitted. The proposed development would not conflict with policy 31. The conflict with Core Strategy Policy 1, Local Plan Policy EN1 and RES1 of the Broughton Neighbourhood Development Plan must be given significant weight. Material considerations that may weigh in favour of the development against the conflict will be considered later in the report.

Housing Provision

In July 2018 the revised Framework was first published, with subsequent updated versions published in February 2019 and July 2021. The Framework, along with revised Planning Practice Guidance, introduced the standard methodology as a mechanism to calculate local housing need. Paragraph 61 of the Framework states that strategic policies should be informed by a local housing need assessment conducted using the standard methodology unless exceptional circumstances justify an alternative approach.

Paragraph 74 of the Framework (2021) states that local planning authorities should identify a supply of specific deliverable sites to provide five years' worth of housing against their housing requirements set out in adopted strategic policies, such as Policy 4(a), or against local housing need where the strategic policies are more than five years old (unless the strategic policies have been reviewed and found not to require updating) with an additional buffer of 5% to ensure choice and competition in the market for land.

Policy 4(a) of the Core Strategy seeks to deliver a total of 22,158 new dwellings across the three Central Lancashire districts during the plan period of 2010-2026, which sets a requirement of 507 dwellings per annum for Preston. Up to January 2020 the Council used the Core Strategy housing requirement to assess its housing land supply. However, following continued monitoring of the situation in the period of time following publication of the revised Framework in 2018 and 2019, the Council stopped using the figure in Policy 4(a) of the Core Strategy in January 2020, as it was considered the introduction of the standard methodology represented a significant change in circumstances rendering the figures in Policy 4(a) out of date.

At April 2021 the local housing need figure calculated using the standard methodology is 254 dwellings per annum. Against this figure, at April 2021 the Council can demonstrate a 15.3 year supply of deliverable housing land.

The Council's reliance on the standard methodology has been contested by applicants and on 9 March 2021 the Planning Inspectorate issued its decision in relation to an appeal into a proposal for 151no. dwellings at Cardwell Farm, Barton. The Inspector allowed the appeal and in doing so determined that Core Strategy Policy 4(a) had been reviewed in

2017, and should be considered as up to date. In doing so he rejected the Council's argument that it was entitled to rely upon a 13.6 year supply of deliverable housing land (at that time) using the standard methodology. Having rejected the Council's primary argument, he accepted the common position of the main parties to the inquiry that should the housing requirement in Policy 4(a) of the Core Strategy be up to date, the Council could only demonstrate a 4.95 year supply of deliverable housing land (at that time) and therefore the 'tilted balance' was engaged.

The Council considers in making his decision, the Inspector failed to deal with material considerations which were raised by the Council during the inquiry and which were of considerable importance to the Council's case, in particular whether the introduction of the standard method for calculating housing need represented a significant change in circumstances since the 2017 review of the housing requirements in Policy 4(a) of the Central Lancashire Core Strategy, which justified the use of local housing need to assess housing land supply in Preston. Consequently, the Council has decided to challenge the decision in the Planning Court. On 10th November 2021 the High Court (the Honourable Mr Justice Dove) granted permission, to the Council, to apply for a Statutory Review against the Secretary of State's decision to grant planning permission on Cardwell Farm. Furthermore, the Council maintains its position in relying upon the standard methodology and has presented a case on that basis at a recent hearing of 7 appeals in Goosnargh/Longridge. The decisions on these appeals are awaited.

Whilst, the Inspector's decision at Cardwell Farm is lawful until it is set aside and is a material consideration, there has been another appeal decision recently issued in connection with a site in South Ribble, Chain House Lane, where a similar argument to that rejected at Cardwell Farm was run. Here the Inspector accepted the argument and concluded that for the purposes of that appeal, it was appropriate to calculate the housing requirement against local housing need using the standard methodology due to the significant difference between the local housing need figure and that of Policy 4(a) amounting to a significant change in circumstances which renders policy 4(a) out of date. However, the Chain House Lane decision has also been challenged in the Planning Court though, as above, it is a lawful decision and remains a material consideration until set aside.

The Council considers that the most appropriate figure to use in assessing housing land supply is the local housing need figure and not the Core Strategy Policy 4(a) housing requirement.

As such, the Council maintains its position that by using the standard methodology it can demonstrate a 15.3 year supply of deliverable housing land. For completeness, however, and in view of the conflict surrounding this point, if the Core Strategy Policy 4(a) housing requirement is used to assess housing land supply, as at April 2021 the Council can demonstrate a 6.1 year supply of deliverable housing land.

The tilted balance is therefore not engaged on housing land supply grounds.

Impact on the Area of Separation (AoS)

Policy 19 of the Core Strategy seeks to protect the identity, local distinctiveness and green infrastructure of certain settlements and neighbourhoods by the designation of Areas of Separation and Major Open Space, to ensure that those places at greatest risk of merging

are protected and environmental/ open space resources are safeguarded. In Preston, AoS are designated around Broughton, Goosnargh/Whittingham and Grimsargh. Policy EN4 of the Local Plan states that proposals will be assessed in terms of their impact upon the AoS, including any harm to the effectiveness of the gap between settlements and also the degree to which the development would compromise the function of the AoS.

The application site is located 140m south of the southern boundary of Broughton. The next nearest settlement to the south is the Preston urban area approximately 0.65km away. The Area of Separation runs between these two settlements, and it is not considered the proposed scheme would result in the merging of the Settlements of Broughton and the Preston urban area. As such, it is considered the effectiveness of the AoS gap would be maintained and the identity and distinctiveness of the village preserved. It is therefore considered that the proposal would not cause harm to the effectiveness of the AoS and would not conflict with the above policies. The proposal not conflicting with these policies does not, however, diminish the conflict with Core Strategy Policy 1 and Local Plan Policy EN1, as those policies set out the spatial strategy for growth in Preston.

Impact on Landscape Character and Visual Amenity

The spatial strategy set out in Core Strategy Policy 1 and Local Plan Policy EN1 does not seek to protect the open countryside for its own sake, nor do these policies require an assessment of visual impact. Policy 13 of the Core Strategy requires development to conserve and where possible enhance the character and quality of the landscape. Policy 21 of the Adopted Core Strategy does not seek to prevent development in principle, but does seek to ensure that any development that does take place is compatible with its surroundings, further stating that it should contribute positively to its conservation or restoration or the creation of appropriate new features. The Framework (2021) says that the intrinsic character and beauty of the countryside should be recognised, with the planning system contributing to and enhancing the natural and local environment. It does not seek to protect all countryside from development; rather it concentrates on the protection of “valued” and “distinctive” landscapes, and seeks to encourage development on previously developed land.

Policy NE2 of the Broughton Neighbourhood Plan seeks to ensure the visual impact of new development particularly that on the edge of the defined settlement of Broughton when viewed from approaching routes should be minimised by landscape screening and tree planting.

The term “valued landscape” is not defined, but the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA) advises that ‘value’ can apply to areas of landscape as a whole, or to individual elements, features and aesthetic or perceptual dimensions. The applicant has submitted a Landscape and Visual Impact Assessment (LVIA). The Landscape Character Assessment identifies this area as within the Lancashire and Amounderness Plain National Character Area, a landscape tract that is composed of a rich patchwork of pasture, arable fields and drainage ditches, on a relatively flat to gently undulating coastal landscape. The site is green field and within the open countryside and an area of separation.

The application is accompanied by a Landscape and Visual Appraisal (LVA) which aims to identify any potential landscape and visual effects of the proposed development within the site's context. The Landscape Appraisal states that the site is comprised of a single arable field and the landscape in which the application site lies is largely influenced by suburban land uses. The site is semi-enclosed due to the predominantly well-established vegetation along the site's perimeter, however gaps in the hedgerows allow for views of the suburban land uses around the site. The LVA states that due to the influence of Garstang Road to the east, and existing and consented residential development along all four boundaries, the application site holds a typical settlement edge agricultural field character; with influences of urban edge characteristics. The LVA concludes that overall, the landscape effects resulting from the proposed development would be highly localised, no higher than moderate/negative, and limited to the site itself. All other effects, outside of the site, would be neutral in nature. The LVA proposes mitigation measures including: retention of existing trees and hedgerows where possible; reinforcement of boundary vegetation with new native shrub planting where there are existing gaps and native trees; proposed native trees, mixed native hedgerow planting and species-rich grassland within the public open space to the south and west.

The submitted parameters plan and indicative layout plan shows where the built development and public open space would potentially be positioned and how the site could be laid out following the creation of a central internal access road. The parameters plan indicates that hedgerows and trees could be retained and incorporated into the layout. The indicative layout suggests that the estate would have a density of development of around 19 dwellings per hectare [dph], increasing to 31 dph when open space is excluded. The Council's Landscape Architect does not disagree with the findings of the LVA, but indicates that the following objectives should be achieved, should planning permission be granted, through any future application for reserved matters: respecting the setting of the Grade II listed building to the south of the site; delivering significant biodiversity enhancements; providing public open space; accommodating sustainable urban drainage; retention of existing trees and hedgerow on all boundaries as far as possible (other than those affected by access); and providing connectivity to the Guild Wheel. The rural edge/leafy character of Broughton should be protected by protecting and widening the existing green frontage of the site, which would also respect the setting of heritage assets and protect the value of the land as a wildlife corridor. The Council's Landscape Architect considers the open space at the southern edge of the site would successfully separate the site from existing buildings and the features within the public open space should complement the existing facilities on the King George V playing fields to the north east of the site. A detailed soft and hard landscaping scheme will be required to be submitted with any future reserved matters submission, should permission be granted.

Taking the conclusions of the applicant's LVA into consideration, it is considered that whilst the proposed development would result in the loss of pasture, the site is well-contained visually and would not have a significant adverse impact on the landscape character of the area due to the site-specific conditions identified in the LVA. Residential development on a greenfield site within the open countryside, regardless of site-specifics, must, by definition cause "harm" but in this instance, that harm would be mitigated by the site-specific conditions and mitigation proposed. As such, it is considered the proposal would not conflict with Core Strategy Policy 13 and Policy 21, Broughton Neighbourhood

Development Plan Policy NE2 and respect the relative aims of the Framework. The proposal not conflicting with these policies does not diminish the conflict with Core Strategy Policy 1, Local Plan Policy EN1 and Broughton Neighbourhood Development Plan Policy RES1, as these policies set out the spatial strategy for growth in Preston.

Heritage Impacts

Section 66(1) of the Planning (Listed Building and Conservation Area) Act 1990 (LBCA Act) relates specifically to listed buildings and states “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

The Framework (2021) states that heritage “...assets are an irreplaceable resource, and should be conserved in manner appropriate to their significances, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”.

Paragraph 194 of the Framework (2021) requires an applicant to describe the heritage assets affected by a proposal, and that the level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

When determining planning applications involving heritage assets, paragraph 197 states that LPAs should take account of:

- a) The desirability of sustaining and enhancing the significance of the heritage assets and putting them to viable uses consistent with their conservation;
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 requires that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets’ conservation. The more important the asset, the greater weight should be applied, and this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 200 goes on to state that any harm to, or loss of, a heritage asset requires clear and convincing justification, and substantial harm to grade II listed buildings should be exceptional, and substantial harm to a scheduled monument should be wholly exceptional.

In terms of Local Policies, Policy 16 (Heritage Assets) of the Core Strategy seeks to protect and enhance the historic environment by:

- a) Safeguarding heritage assets from inappropriate development that would cause harm to their significance; and
- b) Supporting development or other initiatives where they protect and enhance the local character, setting, management and historic significance of heritage assets, with particular support for initiatives that will improve any assets that are recognised as being in poor condition, or at risk.

Policy EN8 (Development and Heritage Assets) of the Preston Local Plan states that proposals affecting a heritage asset or its setting will be permitted where they make a positive contribution to the character and local distinctiveness through high quality new design that responds to its context, are accompanied by a satisfactory Heritage Statement that fully explains the impact of the proposal on the significance of the heritage asset and sustain, conserve and, where appropriate enhance the significance, appearance, character and setting of the heritage asset itself and the surrounding historic environment.

The application site sits in close proximity to three Grade II listed buildings; Bank Hall and Bank Hall Farmhouse (this is a single building subdivided and will be referred to as Bank Hall) to the southwest of site, Broughton War Memorial to the southeast and the Pinfold to the northeast of site. A Heritage Statement prepared by Kathryn Sather & Associates Heritage Conservation Consultants was submitted with the application. The report identifies that Bank Hall dates from the medieval period with the listing description identifying the special interest of the building as internal; the medieval timber structure and the later inglenook fireplace. The northern property within Bank Hall is currently undergoing extensive building works, including a large extension, (approved under applications 06/2019/1084 & 06/2019/1085); it is proposed to use the front garden as car parking. The applicant's Heritage Statement concludes that the Bank Hall structure is of national significant as whilst it has undergone extensive external alteration, much of the internal timber-framed structure has been retained, despite the later sub-division of the building. It is historically significant due to the association with the Singleton Family and the Catholic Church during 16th to 18th century and contributed to the physical sub-division of the building and would have a medium level of significance.

The Broughton War Memorial was constructed after the Great War and was designed as a tall wheel-head stone cross set above a flight of stone steps and surrounded by iron railings. This was added to following the Second World War with an area of paving, railings and behind it a sandstone altar, on either side of this were panels for the names of those who had died in the Second World War. Additionally, a 'bench of contemplation' was provided on the opposite side of Garstang Road. Since this time, and the construction of the Broughton by-pass, traffic-calming works have been added to the Garstang Road between the two. The report concludes that this has the additional consequence of visually linking the two parts. The report finds the memorial has both architectural and historic significance, particularly given the associated archival evidence and would have a medium level of significance.

The Pinfold probably dates from and is associated with the turnpiking of the road from Preston to Lancaster, approved by an Act of Parliament in 1751. It is a rectangular stone enclosure, approximately 8 x 10 metres, built to a height of about 1.5 metres of roughly-squared sandstone blocks with rounded copings. There is a gate in the northwest corner with slab sides and a stone lintel which might suggest that it was predominantly for sheep, but there is also an opening in the southeast corner without a lintel. The statement notes that the 1847 OS refers to a Pound (Pinfold) some 100m to the north of the site, showing a small circular structure on the east side of the road adjacent to the Toll Cottage. The 1893 OS map shows a rectangular structure in the current position and nothing to the north. It is possible that either the 1847 map was wrong or the Pinfold was relocated and rebuilt

between 1847 and 1893. The statement concludes that the structure is an example of a virtually intact later example of the declining built form associated with animal welfare and its regulation within a settlement and which would have a medium level of significance.

The statement identifies that Bank Hall is located at the end of a cul-de-sac and cannot be appreciated from Garstang Road and regardless the significance is primarily internal. The War Memorial is visible along Garstang Road but due to greenery and a bend in the road it does not form part of longer views. The Pinfold is visible from Garstang road but obscured by housing to the north and hedging to the south.

The statement assesses the indicative layout which includes significant greenspace to the south and western edges of the application site and concludes that this would preserve the setting of Bank Hall whilst the retention of hedging and trees to the boundary with Garstang Road would avoid harm to the visually important views of the other heritage assets. The report concludes that the proposed development will not physically or visually isolate the heritage assets, although the report notes the layout is indicative and would be dealt with at reserved matters stage. In terms of the wider effects the proposal would change the agricultural field to residential development, but notes this would form part of wider development to the south of the village (residential development approved on land off Sandy Gate Lane and land previously known as Key Fold Farm). It notes that the significance of the heritage assets is not dependent on the use of the application site. The views of the three heritage assets will remain unaltered by the proposed works. The development will not impact upon the ways in which the assets are experienced. The report finds that the proposed development would have a neutral impact on the setting of the heritage assets.

Following the initial review of the application the Local Planning Authority (LPA) had concerns that an insufficient level of detail had been provided to properly assess the impact of the proposal on the heritage assets, although the submitted Heritage Statement was suitably detailed. Subsequently a request was made for matters of appearance, layout and scale to be submitted as part of this application to allow a full assessment of impact rather than one based on an indicative plan which cannot be conditioned. The applicant did not want to submit this additional level of information and as such provided a parameters plan to detail the areas of built development and public open space. This plan also included indicative landscaping arrangements to the edges of site so that they can be conditioned at outline with precise details provided at reserved matters should permission be granted.

The submitted parameters plan sets out the areas of site that would be built out with housing, and would be public open space and confirms the minimum off set, which would be achieved between the area of built development and each of the listed buildings. The War Memorial is seen in the context of Garstang Road with limited wider visibility, its importance is not derived from its setting adjacent to undeveloped land, with views intended to be from the bench of contemplation on the opposite side of Garstang Road, and as such the development of the site would not harm its setting or importance. The proposed development would not impact upon the setting of the Pinfold which is seen in the context of Garstang Road and housing development to its north. Additionally, development has commenced at Key Fold Farm on the opposite side of Garstang Road to

the application site and south of the Pinfold, as such its setting is characterised by residential development. Bank Hall was historically associated with farming and as such the neighbouring open land does form part of the buildings setting, however as the building is set back from Garstang Road only limited glimpses of the building are available across the application site. As noted in the submitted Heritage Statement the building has been altered externally with its primary structural significance internal, as such its setting is only considered as a positive contributor to its significance. When taking these factors into account the loss of the limited views would have a negligible impact on the asset. The impact of the proposals is therefore considered to cause less than substantial harm in accordance with paragraph 199 of the Framework.

Paragraph 202 of the Framework (2021) states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Whilst the existing immediate rural/open setting is a positive contributor to the significance of Bank Hall its contribution to the overall value/significance of Bank Hall is small/low. It is possible to achieve glimpses of Bank Hall from Garstang Road, looking west across the application site, hence the site is part of the setting of Bank Hall. The parameter plan shows a sizeable portion of public open space to the south of the application site, which would retain some sense of openness in this part of the site, clear from built development, hence would create new opportunities for the public to view Bank Hall. Whilst the proposed dwellings would likely impinge on the some of the glimpsed views from Garstang Road, the broad band of open space would reasonably mitigate any loss of those glimpsed views by providing a publically accessible area in which appreciation of Bank Hall could take place. This would balance out any slight (negligible) harm caused to the setting. In this case the less than substantial harm, albeit negligible, would be balanced by the public benefit of new and closer opportunities to view Bank Hall. In the event of an approval, the development should be carried out in accordance with the parameters plan, which can be secured by condition, to ensure the open space is delivered and the public benefit achieved.

Subject to the conditioning of the parameters plan, the proposed scheme would comply with Core Strategy Policy 16, Local Plan Policy EN8 and the Framework. Furthermore, in the consideration of this application the Council has had special regard to its duty in preserving the setting of the nearby heritage assets in line with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Affordable Housing

Policy 7 of the Core Strategy seeks to ensure on-site affordable housing provision of 30% within urban areas and of 35% in rural areas subject to such matters as financial viability and contributions to community services. The Central Lancashire Supplementary Planning Document 1: Affordable Housing states that where an element of affordable housing is required, at least 70% of the units shall be social rented or affordable rented, unless the Council is satisfied that an alternative mix meets an independently assessed proven need and agrees to such alternative provision. The SPD goes on to say that affordable units within residential developments should be dispersed to promote integration, mixed communities and to minimise social exclusion.

Up to 51no. dwellings are proposed and affordable housing provision is required. As the site is within a rural area the required provision would be 35%. A total of 18no. affordable dwellings are proposed, equating to an affordable housing provision of 35%. This would accord with CS Policy 7 and the Affordable Housing SPD. The applicant has confirmed that the development would provide 35% affordable housing provision as required by policy, and it is considered that the type, tenure and delivery of the affordable housing would be secured through a Section 106 Obligation, should planning permission be granted. It is therefore considered that the application complies with the Affordable Housing SPD and Core Strategy Policy 7.

Design and Layout

Core Strategy Policy 17 states the design of new buildings will be expected to take account of the character and appearance of the local area, being sympathetic to surrounding land uses and occupiers and avoiding demonstrable harm to the amenities of the local area. Core Strategy Policy 5 seeks to secure densities of development which are in keeping with local areas and which will have no detrimental impact on the character, appearance, and distinctiveness of an area, whilst also making efficient use of land.

Policy EN9 of the Adopted Local Plan states that all new development proposals should be designed with regard to the principles set out and explained in the Central Lancashire Design Guide SPD, which are movement and legibility; mix of uses and tenures; adaptability and resilience; resources and efficiency; architecture and townscape. The Design Guide SPD seeks to raise the level and quality of design of new buildings, sets out a number of well-established principles of good design and how these can achieve a clear and robust design concept for a site.

Policy NE2 of the Broughton Neighbourhood Development Plan states that the visual impact of new development particularly that on the edge of the defined settlement of Broughton when viewed from approaching routes should be minimised by landscape screening and tree planting.

Policy RES2 of the Broughton Neighbourhood Development Plan requires residential development of more than 10 dwellings shall provide a range of housing to meet local needs as identified in the latest objective assessment of local housing needs.

Paragraph 126 of the Framework (2021) states that good design is a key aspect of sustainable development, and the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 134 of the Framework (2021) states permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. In addition, the National Design Guide illustrates how well-designed places can be achieved and sets out the Government's priorities for well-designed places in the form of ten characteristics.

The application is outline with access applied for and design, scale, layout and landscaping to be dealt with at reserved matters. As such these matters would be assessed as part of the relevant reserved matters application(s) which would require the proposed development to fit in with its setting, complementing the existing pattern and style of

development in the area. The submitted Design and Access Statement includes an indicative site layout plan which demonstrates that 51no. dwellings could be comfortably constructed on site with required infrastructure and greenspace. House designs have not been provided, but the indicative plan includes a range of dwelling types and sizes and there is no reason why a suitable range of styles could not be achieved at reserved matters stage. As such in principle and subject to a suitable reserved matters application the proposal can comply with the requirements of the above policies and the Framework.

Open Space Provision

Policy 17 of the Core Strategy states that the provision of landscaping and open space should form an integral part of new development proposals, including enhancing the public realm. Policy 18 of the Core Strategy seeks to manage and improve environmental resources through the protection and enhancement of the natural environment. Policy 24 of the Core Strategy seeks to promote access to sport and recreation facilities, including children's play provision, through developer contributions where new development would result in a shortfall in provision.

Policy HS3 of the Local Plan requires this scheme to provide sufficient public open space to meet the recreational needs of the development in accordance with standards set out in the Central Lancashire Open Space and Playing Pitch SPD. On-site provision of amenity green space and active play facilities for children/young people (i.e. play equipment) would be required as the development would be over the 100 dwelling threshold level.

Paragraph 98 of the Framework (2021) states access to high quality open spaces and opportunities for sport and physical activity make an important contribution to the health and well-being of communities. Paragraph 100 also advises that Local Planning Authorities should seek to protect and enhance public rights of way and access.

The submitted parameters plan show that the Public Open Space (POS) would be located to the south of the site to provide a buffer to the nearby listed buildings. Such a proposition would offer generic benefits that would be expected from any major housing development of this size. The maintenance and management of amenity greenspace would be secured by a Section 106 Obligation should planning permission be granted. Subject to further reserved matters submissions and conditions the proposal has demonstrated a capacity to satisfy the principle of Core Strategy policies 17, 18, 24 and Preston Local Plan Policy HS3.

Impact on Residential Amenity

Policy 17 of the Core Strategy and Policy EN9 of the Local Plan state that the design of new buildings will be expected to take account of the character and appearance of the local area, being sympathetic to surrounding land uses and occupiers and avoiding demonstrable harm to the amenities of the local area.

Paragraph 180 of the Framework (2021) seeks to ensure a high standard of amenity for all existing and future occupants of land and buildings.

As the application is in outline with all matters reserved except access, issues relating to impacts on privacy, overlooking, loss of light and overshadowing cannot be fully assessed

at this stage. The indicative site layout plan seeks to demonstrate that the proposed development could be satisfactorily accommodated on site without having any unacceptable adverse impacts on the amenities of neighbouring residents. There are existing properties to the north and southwest with ongoing residential development to the west and east. The indicative layout demonstrates that a suitable layout can be provided to ensure the required off set from the new residential development to the west and east could be achieved.

To the north lies no.483 Garstang Road which is located 24m at its closest point from the northern edge of the application site which is sufficient to prevent any unacceptable harm in terms of amenity. To the southwest of the application site is a cluster of properties around Bank Hall, with the closest dwelling a converted barn north of Bank Hall, which is a minimum of 6m from the boundary with application site. The parameters plan proposes landscaping and open space within the application site in this area and as such would allow an appropriate offset to be maintained to avoid any unacceptable impact to the dwellings south west of the application site

The Council's Environmental Health Officer recommends that a condition requiring a Construction Environmental Management Plan in relation to noise, dust and air quality is attached to any future permission granted, to ensure neighbouring amenity is not unacceptably impacted during construction. It is therefore considered that the proposal would not conflict with the above policies.

Traffic and Highway Safety

Core Strategy Policy 2 states that the Local Planning Authority will work with infrastructure providers to establish works that will arise from or be made worse by development proposals. It further states that the Local Planning Authority will set broad priorities on the provision of the infrastructure to ensure that it is delivered in line with future growth. Core Strategy Policy 3 outlines a number of measures which are considered to constitute the best approach to planning for travel. These include reducing the need to travel, improving pedestrian facilities, improving opportunities for cycling, improving public transport, enabling travellers to change their mode of travel on trips, encouraging car sharing, managing car use and improving the road network.

Policy ST2 of the Adopted Local Plan requires development proposals to demonstrate that the efficient and convenient movement of all highway users and corridors which could be developed as future transport routes are not prejudiced, that existing pedestrian, cycle and equestrian routes are protected and extended; the needs of disabled people are fully provided for; appropriate provision is made for vehicular access, off-street servicing, vehicle parking and public transport services; and that appropriate measures are included for road safety and to facilitate access on foot and by bicycle. Adopted Local Plan Policy ST1 requires new development proposals to provide car parking and servicing space in accordance with the parking standards contained within the Appendix B to the Adopted Local Plan.

Paragraph 111 of the Framework (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The initial submission included a Proposed Site Access plan, which proposed a single access on to Garstang Road, and a Transport Statement. The statement concludes that Personal Injury Collision data over a 5 year period does not indicate any inherent safety issues with the existing highway network. The proposed access would be a simple priority junction and that suitable visibility splays can be achieved. Swept path analysis shows that larger refuse vehicles can safely enter and exit the site. The site is accessible by foot, cycle and public transport. The application proposal is expected to generate 30 trips in the morning and 35 trips in the evening which the statement concludes would have no material impact on the local highway network.

County Highways initially objected to the scheme as the proposals failed to demonstrate a safe and suitable access to site for all people. They also considered insufficient technical information was submitted to show that the cumulative impact of the development on the A6 corridor would not be unacceptably detrimental. The applicant subsequently provided a response and amended plan. County Highways raise no objection to the proposed vehicular or pedestrian/cycle access onto Garstang Road but request radii curbs be added to the northern proposed access. This has been provided and comments from County Highways are awaited. An update will be provided in late changes.

National Highways note that the expected trip generation within the submitted Transport Statement is not anticipated to have a traffic impact on the strategic road network (SRN) that could be considered severe. They note that there are a number of planning approvals within the area and cumulatively this could impact upon the SRN and this should be considered. They however, raise no objection subject to a condition requiring a travel plan to be in place should approval be granted.

Subject to no further objection from County Highways the proposals would be acceptable in accordance with the above policies and the Framework.

Ground Conditions

Policy EN7 of the Adopted Local Plan seeks to address existing contamination of land by appropriate mitigation measures to ensure the site is suitable for the proposed use and seeks to ensure that proposed development would not cause land to become contaminated.

Paragraph 183 of the Framework (2021) states planning decisions should ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation. After remediation, as a minimum the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

Paragraph 184 of the Framework (2021) goes on to state that where a site is affected by contamination or land stability issues, the responsibility for securing a safe development rests with the developer and/or landowner.

The application is accompanied by a Phase 1 Desk Study prepared by Brownfield Solutions Ltd. The study identifies a potential for contamination at the application site with infilled ponds, an electrical substation and a pump within and in the vicinity of site with the study recommending further investigation. The Council's Environmental Health Officer states as per the recommendations of the Phase 1 Desk Study Assessment, an intrusive Phase 2 Geo-Environmental Site Investigation should be undertaken, which could be secured by condition should planning permission be granted. Subject to said condition the scheme would be acceptable in accordance with the above policy and the Framework.

Flood Risk and Drainage

Core Strategy Policy 29 seeks to improve water quality, water management and reduce the risk of flooding by number of measures including minimising the use of portable mains water in new developments; appraising, managing and reducing flood risk in new developments; managing the capacity and timing of development to avoid exceeding sewer infrastructure capacity; encouraging the adoption of Sustainable Drainage Systems; and seeking to maximise the potential of Green Infrastructure to contribute to flood relief.

The BNDP Policy NE3 states that Sustainable drainage schemes shall be used to drain land wherever possible:-

1. for development
2. waterlogging is an obstacle to use of public open spaces or to enjoyment and use of public rights of way
3. to provide wildlife areas.

Paragraph 167 of the Framework (2021) states that Local Planning Authorities should ensure flood risk is not increased elsewhere (i.e. outside areas at risk of flooding) and only consider development appropriate in areas at risk of flooding where proposals are informed by a site-specific flood risk assessment.

The application included a Flood Risk Assessment prepared by Enzygo Limited which includes an assessment of surface water drainage requirements and details the flood risk and how this can be managed. The assessment identifies the application site as being located in Flood Zone 1 which has the lowest probability of flooding. The site has low infiltration potential due to clayey soils. Mapping indicates a land drain is orientated north to south along the western boundary but does not indicate it's connectivity to the wider watercourse network. The assessment finds that overall, the risk of flooding is negligible although there is a potential for ponding of surface water and a higher risk of flooding adjacent to the land drain. The assessment advises that the flood risk can be managed by: providing an easement to the land drain; maintenance of the land drain; setting floor levels above external levels; and adoption of a surface water management strategy. The assessment recommends that surface water can be managed, such that flood risk to and from the application site following development would not increase by an appropriately sized attention basin with a restricted discharge rate. Water could be discharged to either the drainage network serving the adjacent/western development (land off Sandy Gate Lane) or culverted watercourse beneath Garstang Road serving the adjacent/eastern

development (land previously known as Key Fold Farm).

The Lead Local Flood Authority raises no objection subject to conditions requiring a final sustainable drainage scheme, construction phase surface water management plan and operation and maintenance plan and verification report of the installed drainage system. They also recommend an informative advising that if granted the planning permission would not approve any connection to the land drain at site.

United Utilities note that the site overlies a Groundwater Source Protection Zone 2 and 3. They state the applicant should follow best practice on their use and storage of fuels, oils and chemicals, to remove the risk of causing pollution during construction. They draw attention to advice in The Environment Agency's Approach to Groundwater Protection, which can be added as an informative should the application be approved. In the event of an approval they recommend conditions requiring approval of any penetrative foundation designs, surface water drainage scheme based on the hierarchy of drainage and separate foul and surface water drainage.

Subject to the inclusion of the above conditions the application proposals are considered acceptable in accordance with the above policies and the Framework.

Ecology

Policy 22 of the Core Strategy seeks to protect and find opportunities to enhance and manage the biological and geological assets of the area through certain measures, such as promoting the conservation and enhancement of biological diversity, having particular regard to the favourable condition, restoration and re-establishment of priority species and species populations; and seeking opportunities to conserve, enhance and expand ecological networks. Policy 17 seeks to ensure that all developments protect existing landscape features and natural assets, habitat creation and provide open space.

Policy EN10 of the Adopted Local Plan seeks to protect, conserve, restore and enhance biodiversity and ecological network resources in Preston. Policy EN11 states planning permission will not be granted for development which would have an adverse effect on a protected species unless the benefits of the development outweigh the need to maintain the population of the species in situ. Should development be permitted that might have an effect on a protected species planning conditions or obligation will be used to mitigate the impact.

Paragraph 174 of the Framework (2021) states that planning policies and decisions should, amongst other things, contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.

Paragraph 180 of the Framework (2021) states that when determining applications, Local Planning Authorities should aim to conserve and enhance biodiversity by applying a number of principles. Where development would result in significant harm to biodiversity, which cannot be mitigated, or the development would result in the loss or deterioration of irreplaceable habitats without exceptional reasons, planning permission should be refused.

The application is accompanied by an Ecological Survey and Assessment and an Assessment of Biodiversity Net Gain Report. The Ecological Survey concludes that the site supports habitats within the site that are of only local, and in part, limited value to

biodiversity. The survey goes on to list features of value present on the site, which includes hedgerows, a pond, and bands of scrub to the site boundaries. Great crested newts were recorded in the onsite pond in 2015, however the survey indicates a recent test for great crested newts has come back negative. In terms of biodiversity net gain, the report makes recommendations in respect of biodiversity enhancement as guided by the Framework, in the form of bat and bird boxes.

The Greater Manchester Ecology Unit (GMEU) Ecologist agrees with the findings of both reports, and recommends a suite of conditions be attached, should planning permission be granted, to ensure the development has no adverse impact on protected species and achieves biodiversity net gain. These conditions include:

- The development proceeds in accordance with the recommendations and ecological enhancements measures set out in the Ecology Survey;
- Implementation of protection measures for retained trees, hedgerows and scrub;
- Design of the external lighting scheme for construction and operation;
- Any removal of trees marked as retained should include a further assessment of their suitability to support roosting bats;
- Reasonable Avoidance Measures should be followed during site clearance;
- Boundary treatments should allow provision for small mammal/amphibian gaps; and
- A full landscaping specification should be submitted at reserved matters stage including the features shown within the indicative layout proposing ecological enhancements.

The GMEU ecologist also requests a condition requiring vegetation clearance to avoid the bird nesting season (March-August), however as this is covered by separate legislation, such advice would be attached as an informative. Subject to the above, remaining conditions, if planning permission is granted, it is considered the proposed development would not have an adverse impact on protected species. As such, the proposal complies with the above policies and the Framework in this regard.

Air Quality

Policy 30 of the Core Strategy seeks to improve air quality through delivery of Green Infrastructure initiatives and through taking account of air quality when prioritising measures to reduce road traffic congestion. Policy 3 of the Core Strategy seeks to encourage the use of alternative fuels for transport purposes.

The site does not fall within an Air Quality Management Area and the Environmental Health Officer has raised no objections to the scheme in terms of its impact on air quality. To encourage the use of alternative fuels and improve the air quality of the city, it is considered a condition be attached, should planning permission be granted, requiring a scheme for the installation of electric vehicle charging points to be submitted. Subject to this condition, it is considered the proposal complies with Policies 3 and 30 of the Core Strategy.

Energy Efficiency

Whilst Core Strategy Policy 27 requires all new dwellings meet Level 4 of the former Code for Sustainable Homes (CSH), the Government has published a statement of intention in

respect of this matter, and in accordance with this statement of intention the Council no longer requires new developments to comply with code standards. However, the written ministerial statement (published on 25th March 2015) confirms that for the specific issue of energy performance, Local Planning Authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations. Therefore, the Council requires only the energy efficiency levels of new developments to be equivalent to Level 4 of the former CSH which equates to a 19% improvement in the Dwelling Emission Rate (DER) over the Target Emission Rate (TER) as defined by Part L1A of the 2013 Building Regulations. A condition securing the precise detail of this efficiency to be demonstrated at reserved matters stage could be attached if planning permission was granted and the application would accord with Policy 27 of the Core Strategy in this regard.

Waste Management

The National Planning Policy for Waste seeks to ensure that new development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities, for example by ensuring there is discrete provision for bins to facilitate a high quality, comprehensive and frequent household collection service.

Whilst no details of waste provision have been provided, the indicative site plan indicates there would be sufficient space to the rear of the proposed dwellings to accommodate waste and recycling facilities. The Council's Waste Technical Officer has suggested that although only an indicative site layout has been provided at this stage, the lengths of some of the shared driveways appear excessive and occupiers should not have to move waste containers a distance of more than 25 metres. This will be addressed at reserved matters stage. Furthermore, the Council's Waste Technical Officer recommends a Waste Management Plan should be submitted with a reserved matters application to demonstrate that the Council's largest 8x4 chassis refuse vehicle can adequately and safely traverse and turn within the proposed development. To ensure adequate provision is made for waste and recycling, should planning permission be granted, the above further details would be required at reserved matters stage. Subject to these details, it is considered the proposal would comply with the National Planning Policy for Waste.

Education

Policy 14 of the Core Strategy states that educational requirements will be provided for by enabling seeking contributions towards the provision of school places where a development would result in or worsen a lack of capacity at existing schools.

County Education have made a claim for the applicant to financially contribute to the provision of 19 primary school places (318,249.24) and 8 secondary school places (184,494.00), based on the assumption that all of the proposed 51no. dwellings would have 4 bedrooms. Should this not be the case a reassessment will be required at reserved matters stage and could result in a reduced claim for school places. Should planning permission be granted the section 106 obligation shall include a methodology for recalculating the claim for education based on the number of bedrooms per dwelling.

Planning Contributions

Regulation 111(2) of the Community Infrastructure Levy Regulations 2010 (as amended) and paragraph 57 of the Framework (2021) state that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:

- a) Necessary to make the development acceptable on planning terms;
- b) Directly related to the development; and
- c) Fairly and reasonably related in scale and kind to the development.

The contribution towards primary and secondary school places is considered to comply with the tests set out above as it would mitigate the education impacts of the proposed development which would otherwise not be provided. The level of on-site affordable housing provision is considered to comply with the tests set out in Regulation 122(2) and the Framework as it would represent 35% of the total number of dwellings on the site, with the remaining 65% of the housing being made available to purchase on a normal open market basis. The requirement to secure the future management and maintenance of the open space is considered to comply with the above tests as it would be directly related to the on-site public open space and would secure its long-term management to allow the space to be used by future residents.

Tilted Balance

A lack of housing land supply is not the only reason why the tilted balance could be engaged, it can also be engaged if the most important policies for determining the application are in the round out-of-date. The assessment as to whether it is appropriate to engage the tilted balance in Paragraph 11(d) of the Framework (2021) is comprised of three stages. Firstly, the most important policies for determining the application must be identified. Secondly, those policies must be assessed to ascertain whether or not they are out-of-date. Thirdly the basket of policies must be looked at to determine if, in the round, it is out-of-date thereby engaging the tilted balance.

The most important policies for determining this planning application are considered to be:

Central Lancashire Core Strategy

Policy 1: Locating Growth

Policy 4: Housing Delivery

Preston Local Plan 2012-2026 (Site Allocations & Development Management Policies)

Policy EN1: Development in the Open Countryside

Broughton Neighbourhood Development Plan

Policy RES1: Broughton Village – Housing Development sites as an extension to the settlement boundary

Core Strategy Policy 1 and Policy EN1 are relevant to the principle of the development proposed. Policy 4 is housing-related and contains the housing requirement figure for Central Lancashire. It has been accepted earlier in this report that Core Strategy Policy 4 is out of date. However, whilst the minimum housing requirement of Policy 4 is out-of-date, it does not follow that other most important policies for determining the application are out-of-

date.

Core Strategy Policy 1 promotes the spatial strategy for growth across Central Lancashire. For Preston this means focussing growth and investment in the main urban area (comprising of the Central Preston Strategic Location and adjacent inner city suburbs), the Cottam Strategic Site, the North West Preston Strategic Location and the Key Service Centre of Longridge. Policy 1 does not unreasonably constrain the ability of Preston to accommodate its local housing need calculated by way of the standard methodology. Policy 1 is therefore not out-of-date.

Policy EN1 restricts development which takes place in the open countryside to that needed for the purposes of agriculture and forestry (or other rural appropriate uses), the re-use of existing buildings and infill within groups of buildings, as well as development permissible in other policies contained within the Local Plan (namely Policies HS4 and HS5). Given the local housing need in Preston (254 net additional homes per annum) is currently substantially below the housing requirement contained in Policy 4 (507 net additional homes per annum), it is clear that more than sufficient land has been allocated in the current Local Plan to meet the local housing need. Policy EN1 does not unreasonably constrain the ability of Preston to accommodate its local housing need calculated by way of the standard methodology. As a consequence, the rural settlement boundaries do not need to be reconsidered at this time and remain relevant and up-to-date. Policy EN1 is therefore not out-of-date.

BNDP Policy RES1 allocates small-scale housing developments at three specific sites within the plan area. BNDP Policy RES1 does not unreasonably constrain the ability of Preston to accommodate its local housing need calculated by way of the standard methodology. BNDP Policy RES1 is therefore not out of date.

As three of the four most important policies for determining this application are not out of date, the basket of most important policies is not out of date and accordingly the tilted balance is not engaged.

3.7 Value Added to the Development

Additional plans and information submitted to address heritage and highways matters.

3.8 Conclusions

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts the determination must be in accordance with the plan unless material considerations indicate otherwise.

The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield, allocated sites, sites within key service centres and other defined places, contrary to Core Strategy Policy 1. The proposed development is not the type of development deemed permissible under Local Plan Policy EN1 and the loss

of open countryside for the development proposed is therefore contrary to this policy. Furthermore, the proposal does not comply with Policy RES1 of the Broughton Neighbourhood Development Plan. The proposal is, therefore, not acceptable in principle and the conflict with the development plan is given significant weight in the planning balance.

It is considered that whilst the proposed development would result in the loss of pasture, the site is well-contained visually and would not have a significant adverse impact on the landscape character of the area due to the site-specific conditions identified in the LVA. Also, the proposed development would not cause resultant harm on the effectiveness of the gap between settlements and would comply with the relevant, up-to-date policies of the Development Plan in this regard. Notwithstanding these matters, however, the location of the site and the lack of visual harm does not diminish the fundamental conflict with the development plan.

The proposal is not considered to impact on the settings of the grade II listed Broughton War Memorial or the Pinfold. There would be harm to the significance of the settings of the grade II listed Bank Hall but this would be less than substantial and would be balanced by the positive benefit of improved visibility, which would be provided from the proposed public open space. In the consideration of this application the Council has had special regard to its duty to preserve the setting of the nearby heritage assets in line with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Statutory consultee comments and representations have been received which have been carefully considered and taken into account as part of assessing this planning application. Whilst the proposed development is contrary to the management of growth and investment set out in the Core Strategy and is not the type of development deemed permissible in the open countryside under Local Plan Policy EN1, the proposed development would not cause harm to the effectiveness of the Area of Separation and would not result in an adverse impact on the character and appearance of the open countryside. There would be no unacceptable harm to protected species and their habitats due to mitigation measures that could be secured by condition. Any harm arising from potential contamination and flood risk could be mitigated by condition. Additionally, the proposed development would deliver a minimum of 35% on site affordable housing. An education contribution is required, and this could be secured by planning obligation. It would comply with the National Planning Policy for Waste. The proposal would be energy efficient and electric vehicle charging points could be secured by way of planning condition. However, these benefits resulting from the proposed development are generic and no more than would be expected from any major housing development and as such they attract limited positive weight in the balance against the conflict with the development plan.

Whilst the improved visibility of Bank Hall from the proposed public open space within the application site would be a public benefit that would balance out any slight (negligible) less than substantial harm caused to the setting of the listed building, and this benefit is not considered to be a generic benefit, it does not however carry sufficient beneficial weight to outweigh the fundamental conflict with the development plan.

Paragraph 12 of the Framework (2021) states that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. As stated above in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposed development fails to comply with Core Strategy Policy 1, Local Plan Policy EN1, BNDP Policy RES1 and the Framework. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposed development fails to comply with the development plan, the benefits of the proposal attract limited positive weight in the balance against the conflict with the development plan and therefore planning permission should be refused.

3.9 Recommendation

Refusal for the reason set out in paragraph 2.1

APPENDIX 4:

Sandy Gate Lane Appeal Decision: Ref. 3179105



Appeal Decision

Inquiry Opened on 6 February 2018

Site visit made on 13 February 2018

by Keith Manning BSc (Hons) BTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 03 April 2018

Appeal Ref: APP/N2345/W/17/3179105

Land off Sandy Gate Lane, Broughton, Preston,

Lancashire PR3 5LA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Hollins Strategic Land LLP against the decision of Preston City Council.
 - The application Ref 06/2016/0736, dated 5 August 2016, was refused by notice dated 2 May 2017.
 - The development proposed is the erection of up to 97 dwellings.
-

Decision

1. The appeal is allowed and planning permission is granted for the erection of up to 97 dwellings at Land off Sandy Gate Lane, Broughton, Preston, Lancashire PR3 5LA in accordance with the terms of the application, Ref 06/2016/0736 , dated 5 August 2016, subject to the conditions set out in the Annex hereto.

Application for costs

2. At the Inquiry an application for costs was made by Hollins Strategic Land LLP against Preston City Council. This application is the subject of a separate Decision.

Procedural and Preliminary Matters

3. The inquiry was in respect of two appeals, conjoined for a single inquiry. For convenience they are respectively referred to, following my pre-inquiry note of 20 December 2017, as **Appeal A** (site A/appellant A) and **Appeal B** (site B/appellant B).
4. Both applications subject to appeal are for housing and are made in outline with all matters reserved except access, for which detailed approval is sought in each case.
5. The Inquiry sat between 6 and 9 February 2018, inclusive, and I conducted my formal visit to the appeal site on 13 February, combining this with my equivalent visit to the site of Appeal B.
6. **This decision is in respect of Appeal A.**

7. Appeal B is referenced APP/N2345/W/17/3179177 (LPA Ref 06/2017/0097). Site B is Keyfold Farm, 430 Garstang Road, Broughton, Preston, Lancashire PR3 5JB and the proposal in that case is for up to 130 dwellings. Appellant B is Wainhomes (North West) Ltd.
8. Each appeal is determined on its individual merits but, as there is much commonality between them in respect of policy context and other considerations, much of the evidence I was presented with and much of my reasoning, notably in respect of the first four of the main issues I have identified below (which are identical as between the two sites) is identical in each case. Matters specific to the site at issue in this appeal are of course reasoned specifically in this decision as necessary. Cross reference to the other appeal, as necessary, is to Appeal B, and joint reference, as necessary, is to both Appeals A and B.
9. Inquiry Documents (ID) may refer to, or be relevant to, one or both proposals, as the case may be; and the same principle applies to the Core Documents (CD) listed.
10. Pursuant to my pre-inquiry note, the appellants A and B combined to agree with the Council a 'Tripartite' Statement of Common Ground (TSoCG).
11. In addition, a Statement of Common Ground specific to this appeal has been agreed between Appellant A and the Council. I refer to this as SoCG (A).¹
12. The Broughton in Amounderness Parish Council ('the Parish Council') participated in the inquiry as a 'Rule 6 party' and I was told that it broadly represents the views of a sizeable proportion of Broughton village residents. Having read the letters submitted, both at application and appeal stage, I have no reason to doubt that; and on a personal note wish to record my appreciation of the courteous and considered manner in which it put its case.
13. Following the lunchtime adjournment on Day 2 of the Inquiry, as a consequence of answers given in respect of the housing land supply by its first witness, under cross-examination by the advocate for Appellant B², the Council informed me that it would no longer be pursuing its sole reason for refusal of both applications, as it was not in a position to defend it. Consequently, the evidence of its second witness, Mr Clapworthy, was formally withdrawn and the Council took no further part in the inquiry so far as matters of substance relevant to the case were concerned.
14. A further consequence is that the evidence of Mr Pycroft³, on behalf of both appellants, and that of Mr Sedgwick on behalf of this appellant, is effectively uncontested by the Council.
15. The appeal is supported by a planning obligation in the form of an agreement between the appellant, the Council, and the Lancashire County Council dated 9 February 2018. In brief detail this provides for financial contributions to primary education in the locality prior to specified thresholds of housing occupation, a travel plan contribution and for the provision of 35% affordable

¹ ID2

² Mr Ponter, advocate for this appellant (A), adopted in full Mr Fraser's cross-examination undertaken on behalf of Wainhomes (Appellant B)

³ Concerning housing land supply

housing under a programme tied to specified thresholds of occupation of the open market dwellings, so as to ensure full delivery of the affordable dwellings.

Main Issues

16. On the basis of my understanding of the substance and circumstances of the appeal, and agreement with the parties on opening the inquiry, I consider, in the context of relevant local and national policy, the main issues in this appeal to be identical to those in Appeal B, namely:-

- Does the Council have an adequate supply of housing land?
- Are the proposed developments adequately accessible to employment opportunities and services?
- To what extent would the proposed developments conflict with and harmfully undermine the strategic land use planning aims of the Council?
- To what extent would the proposed developments conflict with the aims of the emerging Neighbourhood Plan and what weight should be given to any conflict with those aims?
- Would the proposed development in this case give rise to any specific environmental or other harm and what weight should be accorded to such harm?

Reasons

Background: The site in its surroundings

17. The appeal site is described in the SoCG (A) but essentially comprises agricultural land with hedgerows and trees, currently down to pasture, between the south west margin of Broughton, as defined by the grounds of the high school (Broughton College), and the Grade II listed farmstead comprising Bank Hall and Bank Hall Farmhouse and the curtilage, from which the boundary of the appeal site stands clear. The eastern boundary of the site stands clear of the recently by-passed A6 Garstang Road (beyond which lies Appeal site B).
18. The proposed road access to the site is off the southern end of Sandy Gate Lane which, together with Moorcroft and Broadfield, serves part of an established area of suburban style housing north of Dobson's Farm, as well as the high school. The growth of Broughton west of this housing area appears to have been restricted by the presence of the West Coast mainline railway.
19. Much of the western boundary of the site south of the proposed access corresponds to the southern continuation of Sandy Gate Lane as a bridleway, which has in recent years been adapted to accommodate a lit section of the Preston Guild Wheel cycleway ('the Guild Wheel') which continues southwards to cross the railway via an overbridge. Beyond that point the Guild Wheel continues across the valley of the Woodplumpton Brook and from that point southwards across the M55 motorway and into the urban area of Preston itself.
20. From Sandy Gate Lane eastwards the Guild Wheel shares, initially, the high school access before following its southern boundary along an unlit route confined by the northern boundary of the appeal site. (The illustrative plan

supporting the application subject to appeal indicates the possibility of an alternative route for the Guild Wheel through the proposed housing site from the vicinity of Dobson's Farm, south of an existing pond within the site to re-join the original route near the eastern extremity of the site.) The sign post waymarking the Guild Wheel on Sandy Gate Lane includes reference to the Preston North East and Red Scar employment areas, which lie to the south of Broughton, the latter to the east of the M6 motorway.

21. South of the appeal site the land is mainly in agricultural use, ultimately dropping away into the valley of the Woodplumpton Brook before rising towards the M55 which follows higher ground to the south of the water course. In the distance, beyond the motorway, some of the new housing associated with the ongoing North West Preston development area is discernible from the vicinity of the appeal site.
22. The village of Broughton is centred on the crossroads formed by the A6 Garstang Road and the B5269 Woodplumpton Lane/Whittingham Lane. The recently constructed by-pass which runs east of the village from the vicinity of the M55 Junction 1, to a point on the A6 south of Barton via a roundabout junction with Whittingham Lane, has clearly had a significant effect; and a programme of consequential highway improvements facilitated by the removal of much through traffic is under way. A significant section of the by-passed A6 through the village is now subject to a 20 mph speed limit.
23. Historically, the village has witnessed ribbon development along Whittingham Lane in particular with some mid-twentieth century estate development in depth at Pinewood Avenue/Willowtree Avenue, but considerably more of the latter type of development west of the A6 north of Woodplumpton Lane and west of Newsham Hall Lane as far as the railway.
24. Other than those previously mentioned, services and facilities in and around the village currently include various local shops, some of a specialist nature, two filling stations, a public house, a police station, a restaurant, a dental surgery, the North West Ambulance Service NHS Trust, the Marriot Hotel and the Broughton-in-Amounderness Church of England Primary School. The Nos. 40 and 41 bus services (Lancaster - Preston) utilise the A6 Garstang Road and the No 4 bus service (Longridge - Preston) utilises the B5269 through the village.

Background: The policy framework

25. For the purposes of considering the main issues in both this case and that of Appeal B, the essential local and national policy framework is identical and is, for the most part, detailed in the TSoCG.
26. The National Planning Policy Framework, published in March 2012, is a powerful material consideration; but the starting point for determination of the appeals is of course the development plan. For present purposes⁴ the relevant components of the development plan are the jointly prepared⁵ Central Lancashire Core Strategy ('the Core Strategy'), adopted in July 2012 to cover

⁴ It is common ground (TSoCG paragraphs 2.15 and 2.16) that, whilst the Preston City Centre Plan, the saved policies of the Preston Local Plan (2004), the Joint Lancashire Minerals and Waste Local Plan and the Inner East Preston Neighbourhood Plan are also parts of the development plan, the parts relevant to the Appeals A and B are the Central Lancashire Core Strategy and the Preston Local Plan 2012 to 2026.

⁵ By Preston City Council, Chorley Borough Council and South Ribble Borough Council.

the period 2010 – 2026, and the Preston Local Plan 2012 – 2026 *Site Allocations and Development Management Policies* (‘the Local Plan’), adopted in July 2015.

27. Amongst other things, Policy MP of the Core Strategy effectively replicates, so far as decision-taking is concerned, paragraph 14 of the Framework. The “presumption in favour of sustainable development”, as defined therein, including the so-called “tilted balance” (as it is now generally understood) embodied in its second limb, is thereby enshrined in the development plan itself. This point was forcefully submitted by the advocate for Appellant B in closing⁶ who argued amongst other things that, in the absence of a five year housing land supply, the determination process defaults, by virtue of the development plan itself, entirely to the provisions of the Framework, rendering Policy 1 of the Core Strategy, for example, effectively irrelevant.
28. Whilst the logic of the point had been accepted by the relevant witness for the Council, that is not in fact the end of the matter, bearing in mind the need for me to consider the development plan as a whole. Although I was not referred to this by the parties, I note in doing so that the more recently adopted Local Plan carries a similar “model policy”, namely Policy V1. This applies only within the administrative area of Preston City Council and differs subtly from Policy MP of the Core Strategy in a number of ways. First, it clarifies beyond doubt that the reference in the third paragraph to absent or out-of-date policies is a reference to policies in the statutory development plan. Secondly and more significantly, in the words of paragraph 2.1 of the explanatory text, under the sub-title “Vision for Preston” (which concerns the ‘presumption in favour of sustainable development’ being seen as a ‘Golden Thread’ running through plan making and decision-taking), it seeks to... “ensure this presumption in favour of sustainable development at Preston district level.”
29. The third and final paragraph of Policy V1 is as follows:-
- “where there are no statutory development plan policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:*
- a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole and those contained in the Core Strategy;*
or
- b) specific policies in the Framework and Core Strategy indicate that development should be restricted.”*
- (The emphases are mine.)
30. Very arguably this policy has the potential to diminish, if not entirely negate, the force of Mr Fraser’s submission, when the logic embodied therein is applied. However, I am conscious that, unlike the second limb of paragraph 14 of the Framework, the policy carries no exemplification, equivalent to Footnote 9 of the Framework, of the sort of specific policies (in both the Framework and the Core Strategy) which indicate development should be restricted. Moreover,

⁶ ID22 paragraph 13

although the effect of footnote 10 to the Framework⁷ is embodied in the text of the policy, it also differs from the Framework insofar as the second limb to its paragraph 14 states that the presumption in favour of sustainable development means (in the circumstances specified) "granting permission unless..." (the specified policy 'test' is met), whilst the Policy V1 equivalent simply requires that the specified matters are "taken into account". There are therefore small but potentially significant inconsistencies with the Framework paragraph 14 which Policy V1 purports to emulate locally. Notwithstanding the advice of paragraph 15 of the Framework, and bearing in mind also the requirement in that for clarity, I therefore consider the advice on implementation in paragraph 215 of the Framework applies and the weight to be accorded to Policy V1 is to be reduced accordingly, whereas Policy MP of the Core Strategy is effectively on all fours with the Framework.

31. That said, I am not persuaded, all things considered, that Mr Fraser's submissions lead anywhere beyond a need for the above analysis of development plan policy, bearing in mind that, whilst the effect of paragraph 49 of the Framework concerning housing land is clear in its effect, the Framework is also emphatic as to the importance of the system being plan-led and it is well established law⁸ that engagement of the presumption in favour of sustainable development does not render policies in the development plan irrelevant, but rather affects the weight which the decision maker should consider according to them. Indeed, if Policy MP is intended to have the effect claimed by Mr Fraser it would itself be wholly inconsistent with the Framework to the extent that the latter supports the plan-led system.
32. The correct approach in circumstances where paragraph 14 of the Framework is potentially engaged, as here, is not therefore to entirely disregard the policies of the development plan, as Mr Fraser advocates, but rather, in the exercise of planning judgement, to consider the weight to be accorded to potentially determinative policies, alongside other material considerations, within the balance set by paragraph 14. That is the approach I therefore follow in the determination of both appeals A and B.
33. Policy 1 of the Core Strategy sets out its intention to concentrate growth and investment according to a hierarchy of established settlements and strategic sites. As a "smaller village", Broughton is a settlement at the bottom of that hierarchy, in category (f), which is referred to in the following terms: *"In other places – smaller villages, substantially built-up frontages and Major Developed Sites – development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional reasons for larger scale redevelopment schemes."*
34. The proposals at issue meet none of those criteria of scale and clearly do not represent redevelopment. It is common ground that the appeals A and B would both conflict with Policy 1(f).⁹
35. It is also common ground¹⁰ that both would conflict with Policy EN1 of the Local Plan. In the *"Open Countryside as shown on the Policies Map"*,¹¹ this limits

⁷ "Unless material considerations indicate otherwise."

⁸ CD22 *Suffolk Coastal District v Hopkins Homes & Richmond Estates Partnership LLP v Cheshire East Borough Council* [2017] UKSC 37

⁹ TSoCG paragraph 2.23

¹⁰ Ibid. paragraph 2.24

¹¹ i.e. Policies Map for the Preston Local Plan 2012 – 2016

- development to specified categories which large housing estates, such as those proposed in this instance, plainly do not fall within. Although the notation in the key to the Policies Map (presumably for clarity) indicates the Areas of Separation subject to Local Plan Policy EN4 (one of which includes both sites) to be a separate category, paragraph 8.11 of the policy explanation is abundantly clear that Policy EN1 for the protection of the Open Countryside applies within the Areas of Separation in any event. Moreover, it is clear that both appeal sites are effectively outside the Rural Settlement Boundaries indicated on the Policies Map for the purposes of Policy AD1(b) of the Local Plan and hence within the Open Countryside for development plan policy purposes, as acknowledged in the TSoCG.¹²
36. The TSoCG is, however, silent on the matter of potential conflict with Local Plan Policy EN4 concerning Areas of Separation, as this is neither acknowledged by the appellants nor alleged by the Council. Conflict with EN4 is, however, alleged by the Parish Council and individual local residents. This Local Plan policy originates from Policy 19 of the Core Strategy which, amongst other things, states that an Area of Separation will be designated “around” Broughton.
37. In addition to the above policies relevant to the main issues for both appeals A and B, I shall refer only as necessary to other specific policies in the development plan relevant to one or both appeals as the case may be.
38. The Broughton-in-Amounderness Neighbourhood Development Plan (‘the Neighbourhood Plan’) is in the course of preparation. It is proposed that the plan should cover the period 2016 – 2026. Its first iteration¹³ has been independently examined. However, as a consequence of that examination it has effectively been prevented from moving forward to the stage at which it would be ‘made’ and consultation on an amended plan under Regulation 14¹⁴ has been initiated by the Parish Council. The examiner’s report on the first iteration of the plan was received by the Parish Council on 9 September 2017.¹⁵ The examiner “*requested that the Plan should be amended and be subject to a further formal consultation, then be submitted for a further independent examination*”.¹⁶ The Parish Council published the amended plan in October 2017¹⁷ but it appears that the new Regulation 14 consultation has been procedurally challenged and has been repeated for safety, with consequent delay to the Regulation 16 consultation and subsequent examination.
39. It is common ground between the Council and both appellants A and B that, as at the end of January 2018, following the advice of paragraph 216 of the Framework, the emerging Neighbourhood Plan should attract “no more than limited weight” in the determination of the appeals. The Parish Council acknowledges the facts of the matter in the context of relevant procedure and guidance, but emphasises that the circumstances are unusual.

¹² TSoCG paragraph 2.24

¹³ CD15

¹⁴ Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

¹⁵ CD16

¹⁶ Foreword to October 2017 Neighbourhood Plan CD17

¹⁷ CD17

Housing land supply

40. Given the Council's concession that it could not correctly demonstrate a five year supply of deliverable housing sites and consequent effective withdrawal from the contest of the appeals, the first main issue can be addressed in relatively short order. The evidence of Mr Pycroft on behalf of both appellants A and B stands effectively uncontested and there was in any event no significant dispute over the figures to be used in the calculation so far as the individual components of supply were concerned, but rather the way those component figures were to be deployed. The relevant calculation equates to the period addressed by the Council's latest Housing Land Position Statement¹⁸, i.e. the five-year period 1st October 2017 to 30th September 2022. The relevant figures are clearly set out in Mr Pycroft's evidence at Table 3.2.
41. It is necessary, however, to consider certain elements of the calculation in principle in order to assess the magnitude of the acknowledged shortfall.
42. First of all, the 'Memorandum of Understanding' between the three Councils party to the Core Strategy (which has not to my knowledge been reviewed pursuant to its paragraph 7.1 and which was signed by Preston as recently as 3rd October 2017) confirms that, pending the adoption of a replacement local plan, the housing requirements of the Core Strategy are to be applied.
43. Amongst other things, this document recognises at paragraph 5.10 that meeting the housing requirement figures in the current Core Strategy ensures that the Objectively Assessed Need (as in the latest SHMA) is met in full across the Housing Market Area and that apportionment (between the Councils' respective areas) on the basis of the Core Strategy requirements will help to address net out-migration from Preston to other parts of the Housing Market Area.
44. The Memorandum also acknowledges that the Core Strategy has been examined and found to be sound in the context of the Framework. Bearing that in mind, the statutory Duty to Co-operate¹⁹, and also the object of national policy to boost significantly the supply of housing²⁰, I have no reason to question, on the evidence before me as it now stands, the underlying essential merits of what is effectively a joint declaration of intent as to how the Councils will for the time being distribute new housing between and across their respective and combined areas. I am also conscious that the ongoing housing requirements set out in Policy 4 are conceived of as minima.
45. It has been accepted by the Council that the base date of 2014 for assessing housing completions, used for the purposes of the current Strategic Housing Market Assessment (SHMA), is incorrect for the purposes of calculating the five-year supply of deliverable sites. Given that the accepted basis for the housing land requirement is the development plan, in this case the Core Strategy, as indicated in the Memorandum of Understanding, the correct base date going forward is 2010 as the Core Strategy covers the 16 year period 2010 – 2026.
46. The relevant Core Strategy policy for the purpose of calculating housing requirements, Policy 4, embodies the principle of addressing the backlog of

¹⁸ CD10

¹⁹ Pursuant to s110 of the Localism Act 2011

²⁰ Framework paragraph 47

- under-provision since 2003, in addition to the annual requirement from 2010, over the plan period to 2026. In Preston this has led to a significant accumulated backlog a little in excess of 1600 dwellings.²¹
47. Moreover, the evidence before me is persuasive that, effective though the Council's direct efforts to address ongoing vacancy in the older housing stock may be, the net effect of this on the overall supply of housing is effectively neutral and should therefore be discounted, as should the provision of student accommodation which, for a variety of reasons, appears not to have released existing stock for significant inclusion in the supply and in any event the data is patchy and not sufficiently reliable.
48. Although not labelling it as such, the Planning Practice Guidance effectively advocates the use of the so-called "Sedgefield" method to promptly deal with past under-supply or else rely on neighbouring authorities to assist under the Duty-to-Co-operate, but this would not be consistent with the spirit or intention of the Memorandum of Understanding to mitigate out-migration from Preston and the evidence before me²² is now entirely supportive of the Sedgefield approach.
49. The Framework at paragraph 47 advocates the addition of a small buffer of deliverable housing sites to the demonstrable five-year supply so as to ensure choice and competition in the market for land. However, where there has been a record of persistent under delivery of housing, a larger buffer should be added, so as to provide a realistic prospect of achieving the planned supply. The requirement in this circumstance is for an additional 20% on top of the calculated five-year requirement, as opposed to the 5% buffer to be deployed where this is not the case and the principal requirement is simply to facilitate choice and competition.
50. The Framework does not define what is meant by "persistent under delivery" and conclusions on this at appeal have inevitably varied according to evidence and submissions. I am constrained therefore to form my own conclusion on the basis of the evidence before me and the plain, ordinary meaning of the word 'persistent'. This is given in the *Compact Oxford English Dictionary* to hand as "continuing or recurring for a long time". (My emphasis)
51. The evidence demonstrates²³ that, year on year from 2003, there has been a recurrent, albeit not continuous (again, my emphasis) under-delivery of housing, sometimes very significant in numerical terms, that has resulted in a net cumulative under-delivery of housing in Preston of around 1,600 houses. Taking into account the years of under-delivery set against the lesser number of years of over-delivery, but more particularly bearing in mind the net outcome and the object of paragraph 47 of the Framework, I am persuaded that under-delivery has been 'persistent' and therefore counter to Framework intentions to boost significantly the supply of housing. The ongoing problem of under-delivery has not yet been addressed sufficiently in Preston for there to be a realistic prospect of achieving the planned supply consistent with that fundamental intention of national policy.

²¹ Evidence of Mr Pycroft paragraph 11.1

²² As summarised in ID22 paragraphs 18-21

²³ As summarised in ID22 paragraphs 22-24

52. Finally, the appellants call into question the delivery assumptions on a small number of larger sites and, whilst this is inevitably to some degree a matter of conjecture, it is informed by reasoning. Furthermore, as a consequence of the Council's effective withdrawal from the substance of the proceedings, the evidence in that respect has not in the circumstances been tested or challenged through cross-examination of Mr Pycroft and I therefore have no evidential basis to question the overall thrust of the appellants' conclusions regarding those sites.
53. Be that as it may, the adjustments arising would (given the above conclusions on how the principal components of the land supply should be addressed and on how the appropriate methodologies, policy and guidance should be deployed) be of marginal significance to the overall conclusion that the Council cannot currently demonstrate the requisite five-year supply of deliverable housing sites. On a proper footing, in the context of the relevant national policy and guidance, the adopted development plan and the Memorandum of Understanding between the councils party to it, the appellants' primary contention that the supply of deliverable sites is seriously inadequate, when set against what is required as a consequence of that context, cannot be gainsaid.
54. The worst case of only a little over 3 years' supply has been demonstrated and very largely, in effect, accepted by the Council. Even allowing for some positive variation from the appellants' conjectures about a limited number of sites in the supply, this would not improve significantly, and in broad terms I am satisfied that the supply, properly calculated in the context of relevant applicable policy, lies between 3 and 3.5 years only. To put it another way, the current supply of deliverable housing sites is at best only 70% of what is required by national policy as articulated in the Framework and is very likely nearer 60%. On any assessment, in the context of applicable local and national policy, that represents a very substantial shortfall.
55. I acknowledge that to local residents aware of permissions recently being granted elsewhere and the nearby developments at Preston North West, this may seem counter-intuitive; but the reality is that the calculation can only be done at recognised points in time (as supply is inherently dynamic) according to accepted conventions and guidance, and for the Council's administrative area only, given the manner in which the development plan is cast and the Memorandum of Understanding formulated.
56. Other appeal decisions touching on the issue of land supply and other matters can be material and my attention was drawn to a number as listed in the core documents and referred to in evidence. It is clear on reading them that each relates to a particular set of circumstances prevalent at the time and relies on the detailed evidence before the individual Inspectors. Ultimately, I must rely on the circumstances and detailed evidence put to me in respect of these appeals A and B and, given the Council's unequivocal concessions in respect of housing land supply, it serves no useful purpose to give undue consideration to conclusions drawn elsewhere.
57. The recent decision at Pear Tree Lane in Chorley²⁴, decided on the basis of all the evidence and submissions heard by the Inspector at the relevant inquiry, ultimately proved to be of peripheral materiality to the Council's accepted position on this issue. Although within the same Core Strategy area it relates,

²⁴ CD28

moreover, to different circumstances in a different local planning authority, as is clear from its concluding paragraphs,²⁵ albeit the Memorandum of Understanding is clear in specifically agreeing that the adopted development plan is currently the proper basis for determining the housing requirement within the individual local planning authority areas.

Accessibility

58. As I have noted, in the light of its acceptance of the generality of the appellants' joint case on housing land supply, the Council declined to pursue its reason for refusal which, following the officer's report, included the contention that Broughton is a (rural) village with low accessibility to local employment areas, shops and services such that "*unplanned and inappropriate expansion*" (with, clearly, in these cases, housing development) would "*fail to achieve the social and environmental dimensions of sustainable development*". On that basis, the proposals, it has been claimed, would fail to focus development at an appropriate location, contrary to the development plan and the Framework.
59. The Parish Council emphasised, amongst other things, its concurrence with the analysis in the officer reports and the substance of the Council's decision.²⁶ Individual residents have supported the Council's original stance, both explicitly and implicitly. Accessibility therefore remains to be considered as a main issue notwithstanding the position latterly adopted by the Council at the inquiry.
60. I am conscious that Policy 1 of the Core Strategy plans for a development pattern that, for the whole of Central Lancashire, concentrates development according to a settlement hierarchy within which the Preston /South Ribble Urban Area occupies the top tier (a) and smaller settlements including Broughton are included in the lowest tier(f). I place little weight on the appellants' repeated emphasis that the lack of settlements within the intermediate tiers is a significant factor in support of their appeals. The Core Strategy, which addresses the relevant housing market area, self-evidently transcends administrative boundaries so far as the settlement hierarchy itself is concerned. In planning terms the lack of intermediate tiers within Preston is not therefore, in my view, an important or influential factor.
61. Equally, I do not share the erstwhile apparent view of the Council that, because the spatial strategy embodied in the Core Strategy is driven by considerations of sustainability and considered to support and promote a sustainable pattern of development, departures from the articulated aspiration are to be presumed unsustainable. The strategy reflects a policy choice which is considered to optimise the settlement pattern in sustainability terms. Variations on the theme are not necessarily unsustainable in planning terms, not least in view of the definition of sustainable development set out in the Framework at paragraph 6.
62. It is very apparent that Broughton has expanded beyond its early nuclei in certain decades of the last century through the addition of ribbons and, more pertinently, estates of housing. This tendency has been largely but not exclusively concentrated around the east-west axis formed by the B5269 Woodplumpton Lane/Whittingham Lane. The facilities at the centre are readily accessible on foot from much of the village and those facilities would be

²⁵ CD28 paragraphs 63 -71

²⁶ Evidence of Patricia Hastings paragraph 2.1

- similarly accessible to residents of the two developments proposed. That is a simple function of the geography of the settlement.
63. It remains to be seen whether the recent construction of the by-pass will prompt closure or expansion of established businesses or stimulate positive response to new opportunities arising from improved conditions on the principal thoroughfare in particular. Mr Sedgwick's conjecture that an increased population would be beneficial for established and, potentially, new businesses in the village seems to me to be entirely reasonable given the accessibility of the appeal sites to the existing centre.
64. Certain facilities including the church, the hotel, the ambulance service headquarters, the primary school and to some extent the high school, would be more accessible to prospective residents of the proposed housing estates than many existing residents. This is because the linear form of the village would change to a squarer form with most of the latterly mentioned facilities being located on its southern margin.
65. Despite its adjacency to a railway, the settlement lacks a station but the cruciform thoroughfares are adequately and in some respects well served by buses connecting the settlement to distant Lancaster including its University, nearby Preston including the Royal Preston Hospital, Longridge, Garstang, Fulwood and various other settlements. The journey to the centre of Preston is timetabled at around half an hour. The timetables submitted demonstrate the manner in which the bus services operate.²⁷
66. The settlement does lack a supermarket at present but some convenience goods for top-up shopping are available at one of the two filling stations presently open in the village. For obvious reasons, it is an established and widespread practice for car owners to use their vehicles for a weekly shop in any event, even if they have a choice of transport modes or live relatively close to a supermarket.
67. Of particular note is the Preston Guild Wheel, a 21 mile cycling and walking route which encircles the city providing access not only to its more central area but also to a variety of leisure and employment destinations in the surrounding area. Broughton, including the proposed housing sites at issue, has direct access to the route.
68. All in all, I do not consider Broughton to be notably poorly served in terms of access to services and facilities or choice of transport modes. It is a core principle of the Framework, underpinning both plan-making and decision-taking, to "*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*" Policy 1 of the Core Strategy notwithstanding, I do not consider the proposed developments would offend that principle. If anything the reverse is true. They would be well located in those terms by comparison with housing sites associated with many freestanding settlements and the initial stance of the Council on this issue does not in my view withstand scrutiny.

²⁷ ID18 & ID19

Strategic land use planning aims

69. It is recognised by all parties that the proposed developments at issue would both conflict with Policy 1 of the Core Strategy. No other position would be tenable. They simply do not accord with the policy choice which has been made locally to concentrate development in accordance with a specified hierarchy. Oft repeated without good reason, developments such as those proposed would be insupportable in the context of a plan-led system. Individually, and more especially cumulatively, the pattern of development sought by the Core Strategy would be eroded, and the object of promoting it would be undermined.
70. However, the underlying rationale of the policy is the achievement, essentially, of a spatial pattern of development that is sustainable and the degree of harm to that aspiration is tempered to a significant degree in the case of these appeals by my conclusions on the previous issue regarding accessibility. The conflict with the policy itself is greater than the conflict with its originating intentions. That might well not be the case in a more remote and less accessible location or in a settlement lacking, for example, very necessary schooling facilities.
71. Moreover, the strategic land use planning aims of the Council, include, explicitly by virtue of Policy MP of the Core Strategy, the presumption in favour of sustainable development and the triggering of the so-called “tilted balance” by its inability to currently demonstrate a five-year supply of deliverable housing sites, following on from the circumstances anticipated by paragraph 49 of the Framework and the contextual priority to boost significantly the supply of housing as set out in paragraph 47 of that current expression of national policy. It thus follows that the weight to be accorded to the planning aim of delivering housing vis-à-vis the planning aim of accordance with a set hierarchy of settlements is increased commensurately.
72. To some extent the weight to be accorded to housing delivery in this context is counter-balanced by Policy V1 of the Local Plan, albeit for the reasons previously given I do not consider that to be particularly effective in that regard.
73. Nevertheless it is necessary to consider the potentially restrictive effect of Local Plan Policy EN4 concerning Areas of Separation, which also gives site-specific effect, within Preston, to Policy 19 of the Core Strategy.
74. There is no evidence to suggest that EN4 is a policy of restriction equivalent to, for example, Green Belt or comparably restrictive policies set out in Footnote 9 to the Framework. I am, however, conscious of the judicial approach in the Supreme Court in the case of *Hopkins Homes*²⁸. This is clear that a policy such as EN4 should not be regarded as a policy for the supply of housing rendered out-of-date by inadequate supply by reason of paragraph 49 of the Framework; and the same principle applies to Policy EN1 of the Local Plan, which all parties acknowledge to be offended by the proposals.
75. Although neither the appellants nor the Council consider policy EN4 to be offended by the proposals, that is not a position shared by the Parish Council and concerned residents from the locality including Mr Timothy Brown.²⁹

²⁸ CD22

²⁹ ID16 and representation dated 04/10/17 from TB Planning

Whether or not there is conflict with this policy and, if so, the extent to which such conflict would harmfully undermine the strategic land use planning aims of the Council is central to my consideration of this main issue and the ultimate planning balance.

76. First, I am clear that, in essence, policy EN4 is driven by considerations of urban form rather than landscape protection, a point which the relevant witness for Appellant A, in response to my question on the point, did not dispute.
77. Secondly, I set relatively little store by the submissions of Appellant B suggesting the fact that the emerging Neighbourhood Plan is contemplating housing in the same area of separation is of note.³⁰ The scale and location of the proposal is not comparable, albeit the suggestion does tend to underline the general principle that the Area of Separation, as currently defined on the Local Plan Policies Map, is not necessarily intended to be inviolate.
78. That much is in any event apparent from the careful analysis in the officer's reports on both applications subject to appeal, which clearly underpin the Council's view that neither proposal is contrary to the thrust of Core Strategy Policy 19 or Local Plan Policy EN4. The lack of conflict with the development plan in that respect concluded by the Council was reflected in the omission of reference to those policies in its decision notices. Whilst I set some store by the careful analysis undertaken, I do not entirely agree, however, with the overall conclusion.
79. The parent Policy 19 in the Core Strategy is, according to the explanatory paragraph 10.14 of that document, concerned to maintain the openness of countryside in those parts of Central Lancashire where there are relatively small amounts of open countryside between settlements. Amongst other things, the policy is explicit that their identity and local distinctiveness is to be protected by the designation. Policy EN4 of the Local Plan interprets the intention of Policy 19 within the consequentially defined Areas of Separation within Preston in the following terms:-
- Development will be assessed in terms of its impact upon the Area of Separation including any harm to the effectiveness of the gap between settlements and, in particular, the degree to which the development proposed would compromise the function of the Area of Separation in protecting the identity and distinctiveness of settlements. (The emphasis is mine.)*
80. Although it is notable from the Policies Map that the defined area of Separation between Grimsargh and the Preston Urban Area is significantly narrower at its narrowest point than the Area of Separation between Broughton and the Preston Urban Area, the latter is fairly narrow nonetheless. It therefore seems to me that any development of significance within it has the potential to compromise its function to some extent, simply by the fact of reducing its extent. In the case of the appeal sites A and B combined, this would be across a broad front as the physical extent of Broughton would effectively be advanced southwards towards the Preston Urban Area. There would inevitably, in purely physical terms, be some harm to the effectiveness of the gap between the two settlements, as distinct from the perception of that gap so far as local residents and those travelling between the settlements is concerned. The

³⁰ ID22 Paragraphs 44 & 48

remaining gap would be smaller and more vulnerable to perceived or actual closure in the event of further development.

81. Having said that, it is true to say that the world is not perceived in two dimensions, as on a plan or policies map, but rather in three dimensions with, in reality, topographic and visual features such as vegetation playing a significant role. Thus it is that a relatively large gap on a featureless plain may be perceived as comparable in local identity terms to a comparatively small gap in more complex surroundings. I can appreciate that it is this principle which effectively underlies the analysis set out in the officer's reports to which I have previously referred.
82. In terms of the thrust of the policies 19 and ENV4, the emphasis on the degree to which the particular developments proposed would compromise the function of the Area of Separation in protecting the identity and distinctiveness of the settlements concerned adds a further layer of complexity to the consideration of whether the objects of the policies would be significantly harmed. It seems to me that the minimum requirement is for sufficient separation for them to be effectively recognised as separate places.
83. All in all, therefore, it seems to me that, at the most basic level of analysis, the two proposals at issue must, individually and collectively, bearing in mind the site-specific definition of the Area of Separation in the development plan, conflict in principle with its policy object of maintaining the separateness of Broughton as a settlement distinct from the Preston Urban Area; not least in view of their scale and location on the southern margins of Broughton as defined for the purposes of Policy AD1 of the Local Plan. The reality of the matter is that the two settlements as currently defined in terms of the Policies Map, and in terms of physical presence, would become closer together.
84. However, it is clear from the policy as set out that the magnitude of the potential harm to its objects in any particular case is a matter of fact and degree and, moreover, susceptible to mitigation in practice. That being so, the nature of the development, in terms of potential density, design, landscaping, layout and so forth must also be influential in that judgement. The fact that the developments at issue are proposed in outline does not in any definitive way assist on that score but, equally, there is sufficient information on those factors to form a view in principle and, clearly, those particular factors fall to be weighed in the balance of harms and benefits in determining each of the appeals A and B on its individual merits.
85. In conclusion on this issue, it is clear and uncontested that both proposals conflict with the development plan so far as Core Strategy Policy 1 and Local Plan Policy EN1 are concerned. It follows that they would not accord with Local Plan Policy AD1(b) which contemplates small scale development within Broughton. I have also identified a basic in-principle conflict with Policy EN4 of the Local Plan concerning the Area of Separation between Broughton and Preston, albeit such conflict is susceptible to mitigation according to circumstances and individual merits.
86. It has been submitted that Policy MP of the Core Strategy has, in circumstances where paragraph 49 of the Framework is engaged by reason of a shortage of deliverable housing sites (and other circumstances where relevant policies are out of date or non-existent), the practical effect of overriding all other development plan policies. Whilst it is well recognised that development

plan policies can pull in opposing directions and indeed that is to some extent inevitable and therefore entirely normal, I consider, for the reasons previously given, that such an interpretation would be wholly incompatible with the planned system, if taken to the extreme. All manner of development plan policies would be uncritically overridden in pursuit of housing supply. Notwithstanding the priority given to substantially boosting it embodied in the Framework, it cannot on the face of that document be the case that housing supply must necessarily be boosted at the expense of all other policy considerations.

87. Therefore Policy MP does not, in my view, even given the acknowledged housing land shortfall, make the proposals at issue four-square with the development plan itself. Rather it requires the application of the so-called 'tilted balance' of Paragraph 14 of the Framework. Given that I have concluded there would be conflict with the strategic land use planning aims of the Council, which would have the potential at least to harmfully undermine them, that conflict and potential for harm is a consideration to be weighed in the balance in considering whether one or both proposals at issue represent sustainable development.

Neighbourhood Plan

88. Although the Neighbourhood Plan had previously progressed to a relatively advanced stage, prematurity was not cited as a reason for refusal by the Council and has not, as such, been put to me specifically as a consideration by the Parish Council, which acknowledges that, in procedural terms, it now still has some way to go as a consequence of the Examiner's report preventing it from being made, ultimately, as a consequence of a successful referendum.
89. Although I have read that report and am aware of its content, conclusions and recommendations, its merits are not a matter for me and I can accord it only limited weight as a material consideration in any event, as is the case with the emerging Neighbourhood Plan itself, notwithstanding what the Parish Council considers to be the unusual circumstances. The Neighbourhood Plan does not yet form part of the development plan, there are unresolved objections to it and its final content has yet to be resolved following a further examination.
90. My responsibilities are distinct from those of the examiner who will, in due course, conduct a fresh examination and report whether the basic conditions are met, in which case the way forward to a referendum would be cleared. In order to meet the basic conditions the making of the Neighbourhood Plan must be in general conformity with the strategic policies contained in the development plan for the Preston administrative area and it is the examiner's responsibility to assess whether or not that is the case. I, on the other hand, am charged with the responsibility of determining both appeals A and B now, in accordance with usual practice (in the knowledge that both appellants themselves recognise that their proposals conflict with both Policy 1 of the Core Strategy and Policy EN1 of the Local Plan) in the light of the evidence before me. But I see no justification in relevant policy or guidance for delaying those decisions as Mr Brown requests.³¹ Such an approach, in principle, would have significantly deleterious implications for the efficacy of the appeals system.

³¹ ID16 paragraph 27.0

91. The aims of the emerging Neighbourhood Plan are spelt out in the latest draft.³² These are tenfold and in summary are as follows:- retention of rural setting; appropriate scale of development; appropriate form and location of housing development; support for local businesses; vibrant local centre; conservation of heritage and improvement of environment in light of the removal of through traffic; enhanced leisure and recreation; promotion of health and well-being; successful integration of major new housing on the southern and eastern edges of the plan area (i.e. the parish as opposed to the village core); and the safeguarding of the qualities of the surrounding countryside.
92. Insofar as those general aims pull in the same direction as development plan policy which the Council and the appellants acknowledge to be offended by the appeal proposals (notably Core Strategy Policy 1 and Local Plan Policy EN1), or which I have otherwise concluded to be at least potentially at variance in principle with what is proposed (notably policy EN4), then I consider them to reinforce such policy intentions. However, insofar as specific policies and proposals in the Neighbourhood Plan still have some way to go before being incorporated into the statutory development plan, the weight, as the local planning authority acknowledges,³³ remains limited nonetheless. Moreover, pending the Neighbourhood Plan being formally made, a supply of only three years deliverable housing sites continues to engage the "tilted balance" set out in paragraph 14 of the Framework.³⁴
93. All in all, and notwithstanding the progress made and the effort undertaken by all concerned, I am constrained to give limited weight only to any conflict with the aims of the emerging Neighbourhood Plan per se.

Considerations specific to Appeal A

94. The final main issue I have identified concerns site-specifics and the following paragraphs therefore refer exclusively to Appeal Site A unless I indicate otherwise.
95. Situated on the south-west margin of the settlement, this elongated site wraps around the site of the high school and stands clear of Bank Hall and Bank Hall Farmhouse in deference to the listed status of the farmstead. Vehicular access would be taken from Sandy Gate Lane to the south of the high school entrance. The overall site size, the number of houses proposed and the illustrative plan all point to a comparatively low density scheme (circa 15 dwellings per hectare overall³⁵) with ample scope for generous gardens, open space to contain the proposed alternative route for the Guild Wheel through the site, retention of existing trees and generous landscaping.
96. The main public prospects of the site would be from Sandy Gate Lane itself, the high school and its grounds, the Guild Wheel along their common boundary with the site and its continuation southwards towards Preston as far as the rail overbridge. From all these points it appears part of quite an open, pastoral landscape on the fringe of the built up area of the village, albeit of relatively limited scenic quality in itself in my estimation. There would be a limited

³² CD17 paragraph 5.2

³³ TSoCG paragraph 2.35

³⁴ *Richborough Estates and others v Secretary of State for Housing, Communities and Local Government* [2018] EWHC 33 (Admin) - (Case concerning Written Ministerial Statement of 12 December 2016).

³⁵ Calculated on basis of application form

- potential view of built form from the A6 Garstang Road, but this would be considerably mitigated by distance across intervening land and existing vegetation.
97. I am conscious that the evidence base of the emerging Neighbourhood Plan includes a landscape/visual appraisal of potential small-scale housing sites published in October 2017³⁶ and that, within this, Site L comprises the north-western extremity of the appeal site at Sandy Gate Lane and refers to openness as part of an agricultural landscape co-incident with the impression I have formed. Although this contributes to its relatively low ranking as a potential housing site, it is conceived of as a different, smaller, denser (25 dwellings per hectare assumed) site with less scope overall for mitigation of impact at the site margins through design and landscaping or provision of a comparably improved alternative route for the Guild Wheel at this location. Moreover, it has been produced for comparative purposes in the context of the emerging plan to which I can accord only limited weight and is of correspondingly limited assistance in the determination of this appeal.
98. The character and appearance of the appeal site and its immediate environs as open countryside on the rural fringe of the village would of course be changed and influenced by the proposed development, as must always be the case when greenfield land such as this is developed. However, the illustrative layout demonstrates that (with a modicum of adjustment) it should be possible to develop the site in a manner which, given its comparatively low density, is sensitive to its location on the rural fringe of the village and, if housing development is to be permitted in principle at this location, I would consider such an approach to be fundamental to its acceptability, even if that were ultimately to reduce numerical housing delivery at reserved matters stage.
99. It seems to me that this site, whilst carefully configured with the aims, amongst others, of preserving at least some of the setting of Bank Hall Farmhouse and standing back from the A6 Garstang Road, is at a critical point of transition between Broughton and the more obviously rural area to the south as far as the M55. Moreover, it sits within the defined Area of Separation (subject to Local Plan Policy EN4 pursuant to the principle established in Core Strategy Policy 19) between Broughton and houses recently constructed on the large area being developed on the allocated sites at North West Preston. In winter these are visible from the northern margins of the site in the distance beyond the motorway, albeit in the absence of details it is unclear to what extent landscaping as part of that development would obscure their visibility in due course.
100. In summer, I would anticipate that the overlap of trees and hedgerows across the intervening landscape would reduce if not altogether obscure them from the margins of Broughton in any event, but a strong southern boundary to the proposed development would be required to mitigate intervisibility between Broughton and the neighbouring city, so as to at least visually maintain the function of the Area of Separation in protecting the identity and distinctiveness of the settlements, thereby retaining a perception that Broughton is separated from Preston by an appreciable swathe of countryside rather than simply the motorway itself.

³⁶ ID12

101. Although the absolute extent of the Area of Separation would be reduced, there is nonetheless considerable scope for mitigation of harm to its fundamental intentions in the context of a well-conceived layout that is not overly ambitious in terms of housing density. Such a scheme would tend to accord with the analysis set out in the officer's report, thereby reducing, albeit not eliminating altogether, conflict with the policy intention of protecting identity and distinctiveness. Users of the Guild Wheel and any other routes across the intervening remaining countryside between the settlements would retain a sense of departure and arrival, plus some sense of rurality within the remaining Area of Separation.
102. I am required by reason of the primary legislation³⁷ to pay special attention to the desirability of preserving the setting of Bank Hall and Bank Hall Farmhouse. Insofar as this plainly includes the farmland generally surrounding them as the context in which they are experienced, the appeal site would undoubtedly alter it. I do not entirely agree therefore with the submitted heritage statement which concludes that the "application site is located outside of the heritage asset's setting".³⁸ The heritage asset is plainly visible across the application site from the north where the Guild Wheel passes closest to it, certainly in winter when hedgerow vegetation is less effective, albeit that within a farming landscape the planting of a woodland can reduce the physical extent of such a setting in the normal courses of events. That is part of the normal evolution of the setting and has little impact on significance, much of which derives in this case from internal features in any event. Nevertheless, loss of perceptible agrarian setting would be a negative outcome in terms of the setting of the farmstead and would to some extent diminish its significance.
103. That said, I am satisfied that a more robust approach to the landscaping of the area between the heritage asset and the nearest section of the Guild Wheel than is indicated on the illustrative plan referenced 1575-801 would substantially assist in preserving the setting and mitigating what I would consider to be less than substantial harm to its significance in terms of the objectives of paragraph 134 of the Framework, specifically, and the similar intention of the development plan through Policy 16 of the Core Strategy and Policy EN8 of the Local Plan; albeit the former is not entirely consistent with the relevant paragraph of the Framework, which requires a balance of harm against public benefits. I am, moreover, satisfied that the determination of reserved matters is potentially capable of being an adequate safeguard in these respects.
104. It is common ground³⁹ between the Council and the appellant that there are no irresolvable objections to the proposed development on grounds of landscape or visual impact, ecology, highways or flood risk and drainage considerations. I have no authoritative evidence sufficient to gainsay that position, albeit many concerns raised by local residents are in respect of such matters. In particular there is a concern over highway safety and congestion bearing in mind the proximity to the high school. However, it seems to me that such congestion as does occur is a consequence of parental behaviour in using cars to pick up and drop off children at school times. This is a widespread tendency throughout the country, ultimately resolvable, if persistent, only by

³⁷ Planning (Listed Buildings and Conservation Areas) Act 1990 s66(1)

³⁸ Paragraph 4.1 of the submitted statement

³⁹ SoCG (A)

- specific local management measures. The highway authority is in any event clear that the proposed access arrangements are safe and that residual network effects are in principle acceptable. They would certainly not be severe such as to justify refusal on the basis set out in paragraph 32 of the Framework.
105. Logically, given the proximity of the site to the school, there is unlikely to be significant additional parking pressure around the school arising from the proposed development and I am content that the interaction of the proposed access with the existing route of the Guild Wheel and the alternative put forward within the application site would, in principle, be acceptably safe. Moreover, the provision of the alternative proposed would obviate the necessity for users of the Guild Wheel to share the access to the high school - an attribute which I consider would make a positive contribution to highway safety. Ultimately it is the responsibility of all - motorists, cyclists and pedestrians - to interact safely with each other, within the confines of shared infrastructure where that is necessary, and there is nothing inherently unusual or unsafe about the arrangements proposed here to assist that process.
106. Nor do I accept that the enjoyment of the Guild Wheel would be significantly curtailed by what is proposed. A significant rural stretch would remain immediately south of the appeal site. Furthermore the existing Guild Wheel route between the site and the high school initially shares the access of the latter, is narrow, confined in nature, unlit and subject to angular turns. The alternative proposed, although characterised by the housing proposed primarily to the south of it, would nevertheless be gently curving, lit, and (as illustrated) significantly enhanced by potentially pleasant associated landscaping and open space. In the context of the varied nature of the route as a whole, I cannot accept that this would be a significantly harmful proposition. On the contrary, it has the potential to offer a significant improvement to a short stretch of this important local routeway.
107. Overall, for the above reasons, I consider the site-specific characteristics of the proposed development to be well conceived if only largely illustrative at this stage. The proposed development does have the potential to cause a degree of environmental harm insofar as it impinges on the setting of a listed building, albeit that can be largely mitigated through layout and design. Clearly it would involve the loss of open pasture at the fringe of the village but I have no persuasive evidence to suggest that this is valued landscape in the terms of paragraph 109 of the Framework and it is not best and most versatile agricultural land.
108. There is plainly a conflict with the intentions of Core Strategy Policy 1 and Local Plan Policy EN1, as previously explored. Moreover, the proposed development would conflict to a degree, in my view, with the intentions of Local Plan policy EN4 concerning maintenance of an area of separation, albeit the impact of that is susceptible to potentially significant reduction through careful detailed design, such that the perception of prospective merger with Preston and consequent loss of community identity could be mitigated to within acceptable limits. Conflict with development plan intentions is clearly a form of harm within a genuinely plan-led system which has to be set against other material considerations.

109. The weight to be accorded to the harms I have identified is a matter to which I return in the planning balance.

The planning obligation

110. The agreement entered into is a simple form of obligation which would over an appropriate timescale mitigate the impact of the development on the local primary school, provide for the encouragement of sustainable transport habits and deliver 35%⁴⁰ of the housing as affordable housing in accordance with development plan policy.

111. All the obligations in the document are necessary, proportionate and directly related to the proposed development and, in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, I am therefore able to accord them weight in my decision. I have not been advised of any prospective breach of Regulation 123 regarding pooled contributions.

Conditions

112. Leaving aside the main issues, and the scope of the planning obligation to mitigate certain impacts of the development, I am conscious that many other matters raised by individual local residents and the Parish Council in connection with the outline application subject to appeal are capable of being addressed by conditions or otherwise taken into account at reserved matters stage.

113. The Council suggested a range of potential planning conditions (SC)⁴¹ which were discussed at the inquiry. Although I consider them to be necessary and otherwise appropriate in the light of relevant policy and the Planning Practice Guidance, a number are complicated in expression to the extent that it would potentially reduce their robustness and efficacy; and it was agreed that simplification and/or closer adherence to established model conditions would be required in the event of the appeal being successful, as would the removal of duplication.

114. SC1 - SC3 relate to the definition and timescale for submission of reserved matters, the life of the outline permission sought and its definition by reference to specified drawings in the conventional fashion but would require some re-ordering and rewording as 4 separate conditions.

115. It was agreed that it would be necessary to define the permission not only by reference to plans but by specifying the maximum number of dwellings (97) to be constructed on the site. Over and above the need to define the permission with clarity and certainty, my additional reasons for considering such a condition to be necessary in this case are referred to in my reasoning.

116. SC4 and SC13 represent unnecessary duplication bearing in mind that a standard form of condition to control construction methods could be imposed, suitably adapted to encompass these and associated environmental pollution risks more efficiently and comprehensively.

⁴⁰ c/f erroneous reference to 30% at paragraph 6.5 of Mr Sedgwick's evidence

⁴¹ ID20a

117. SC5 concerns the potential for parts of the site to be contaminated for one reason or another but is excessively complicated. It was agreed that it would need to be simplified.
118. SC6 and SC7 concern the implementation of highway works and the proposed alternative route for the Guild Wheel and would be, subject to some re-wording, necessary.
119. SC8 concerns the submission and approval of a travel plan to encourage sustainable travel habits from the outset. It was therefore agreed that the proposed threshold of occupation would be irrelevant and that the travel plan would need to be in place prior to any dwelling being occupied.
120. SC9 concerns wheel cleaning of construction vehicles and would most appropriately be incorporated in the construction method statement previously referred to.
121. SC10 – SC12 variously concern foul and surface water drainage but are excessively and unnecessarily complex. A much simpler approach is to be preferred and the use of sustainable urban drainage principles in the case of the surface water arrangements should be maximised. SC14 would be necessary because Site A has the potential to affect an aquifer if piling or other penetrative foundation techniques are used.
122. SC15 would also be necessary in the case of Site A because the detail of managing and maintaining open space is not otherwise provided for in the planning obligation.
123. SC16, SC17 and SC18 would be required in the interests of maintaining and enhancing biodiversity.
124. SC19 and SC20 would be required to promote energy efficiency and encourage and facilitate more sustainable travel in accordance with local and national policy objectives, including, respectively Policy 3 and Policy 27 of the Core Strategy and, bearing in mind the spirit of the Written Ministerial Statement of 25 March 2015, the requirement in respect of equivalence to Code Level 4 is a reasonable one.⁴²
125. Logically, and for consistency, a condition equivalent to SC10 proposed by the Council in the case of Appeal B, to ensure that management and maintenance of the estate roads is put on a proper footing, would be required.
126. Finally, I consider, and it was agreed, that a condition to protect trees on the site, equivalent to that proposed by the Council in the case of Appeal B, would also be necessary.

Planning balance and overall conclusion

127. The proposed scheme of housing development clearly conflicts with the intentions of the adopted development plan in a number of respects as I have explained. But that of course is not the end of the matter, bearing in mind the

⁴² Policies requiring compliance with energy performance standards that exceed the Energy requirements of Building Regulations can be applied until commencement of amendments to the Planning and Energy Act 2008 in s43 of the Deregulation Act 2015 (not yet in force). At this point the energy performance requirements in Building Regulations will be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4. Until the amendment is commenced conditions should not set requirements above a Code level 4 equivalent.

powerful material consideration of the Framework and, more specifically its explicit intention to boost significantly the supply of housing.

128. Although the policies with which the proposed development conflicts are not policies for the supply of housing as such and may be accorded weight as adopted policies of the development plan, even in circumstances of housing land shortage, by contrast with those of the yet-to-be-made Neighbourhood Plan to which I can accord only limited weight, there are significant benefits potentially arising from the development and a more rounded assessment is required, bearing in mind that application of such policies with full rigour could have the effect of frustrating that important intention of the Framework concerning housing supply.
129. The economic benefits of new housing development are well appreciated, both in terms of the direct stimulus to the local economy and in terms of indirect benefit to local enterprise requiring a local labour force. Moreover, I am persuaded that, more probably than not, the new housing proposed will have positive consequences for local businesses and the provision of services in the village centre. It is logical that should be so, given the increased customer base, not least in the context of consequential and potential improvements facilitated by the removal of through traffic on the A6 Garstang Road. It is, moreover, logical that the cumulative effect of both appeal proposals A and B would be commensurate in terms of that particular benefit.
130. Bearing in mind the potential for biodiversity enhancement at the detailed design stage, the environmental impacts are broadly neutral in the balance. Clearly there would be loss of open pasture to the south of the village and some reduction, in absolute terms, in the actual separation from Preston and perception of that, but much can be done, in all the circumstances, to effectively mitigate the latter. Impact on the setting of Bank Hall and Bank Hall Farmhouse could be effectively mitigated at reserved matters stage and the harm to its significance would be not only less than substantial but markedly at the lower end of that spectrum of harm in, my assessment, and falls to be weighed against the public benefits of the development in any event.
131. In social terms, these benefits would be substantial. Open market housing is needed but more particularly it is clear from the evidence⁴³ that in this locality, as in many places, the provision of a significant amount of affordable housing is a benefit to which very considerable weight should be given.
132. I am also conscious that, notwithstanding local opposition to the development on a variety of planning grounds considered above or otherwise capable of being addressed through condition or obligation, there is a lack of objection from consultees other than the Parish Council⁴⁴ and that the Council's single reason for refusal has not, in the event, been sustained.
133. Given those circumstances, the statutory presumption in favour of the development plan must be seen in the light of the material considerations in favour of the proposal and on the ordinary balance of planning advantage (in the context of a shortfall of deliverable housing sites) I am clear that I would consider them to favour the grant of planning permission.

⁴³ Evidence of Mr Sedgwick but more particularly the evidence of Mr Harris for Appellant B (paragraphs 7.1 – 7.32)

⁴⁴ CD4 paragraph 3.5

134. In this case, however, the concessions by the Council regarding its supply of deliverable housing sites and the effectively uncontested evidence of the appellant in that regard, both in respect of this appeal and Appeal B, demonstrate not only that paragraph 49 of the Framework is engaged but that the shortfall of deliverable housing sites vis-à-vis the five year requirement is currently severe. The application of the 'tilted balance' of paragraph 14 is therefore central to my overall conclusion on the merits of this case.
135. Paragraph 14 is to the effect, amongst other things, that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole, or specific policies therein indicate that development should be restricted.
136. For all the reasons I have given, I consider there would be no adverse impacts sufficient to do that, especially bearing in mind the severity of the demonstrated shortfall of deliverable housing sites; and there are no specific policies of restriction to be applied in that sense.
137. Having taken all other matters raised into account, I therefore conclude that, on the evidence relevant to both appeals A and B, and on its specific individual merits, this appeal should be allowed.

Keith Manning

Inspector

Annex: Schedule of Conditions

- 1) Details of the appearance, landscaping, layout, and scale (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the following approved plans: Location Plan (dwg. LOCA001); Proposed Site Access (dwg. PB5008/SK003 A).
- 5) The development hereby permitted shall be limited to a maximum of 97 dwellings.
- 6) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:
 - i) the parking of vehicles of site operatives and visitors;

- ii) loading and unloading of plant and materials;
- iii) storage of plant and materials used in constructing the development;
- iv) the erection and maintenance of security hoarding/fencing including decorative displays and facilities for public viewing, where appropriate;
- v) wheel washing facilities;
- vi) measures to control the emission of dust and dirt during construction;
- vii) a scheme for recycling/disposing of waste resulting from construction works;
- viii) delivery and construction working hours.
- ix) Protection of surface and groundwater resources

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

- 7) No development shall take place until a contaminated land assessment, including a site investigation and remediation scheme (if necessary) has been submitted to and approved in writing by the local planning authority. Any remediation scheme so required shall be implemented as approved and, in the event of such a scheme being required, no dwelling hereby approved shall be occupied until a contaminated land closure report has been submitted to and approved in writing by the local planning authority.
- If during any subsequent works contamination is encountered that has not previously been identified, then such contamination shall be fully assessed and a remediation scheme shall be submitted to the local planning authority for approval in writing. Any remediation scheme so required shall be implemented as approved and, in the event of such a scheme being required, any of the dwellings hereby approved that have not already been occupied shall not be occupied until a contaminated land closure report has been submitted to and approved in writing by the local planning authority.
- 8) No development shall take place until the detailed construction designs and a scheme for the construction of the site access and the off-site works of highway improvement has been submitted to and approved by the Local Planning Authority in writing. Thereafter, no dwelling shall be occupied until all the highway works within the adopted highway have been constructed in accordance with the approved construction designs and scheme.
- 9) No development shall take place until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the Local Planning Authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under Section 38 of the Highways Act 1980 or a private management and a maintenance company has been established.

- 10) No development shall take place until a fully detailed scheme for the construction of the "Alternative Guild Wheel Cycle Route" (as indicated on the Illustrative Layout Plan, drawing 1575-801 G) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include a programme for implementation and shall be carried out in accordance with the approved details.
- 11) No dwelling shall be occupied until a Full Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Full Travel Plan shall be implemented within the timescale set out in the approved plan and will be audited and updated at intervals not greater than 12 months for a period of 5 years after the adoption of the Plan to ensure that the approved plan is carried out in accordance with its approved provisions.
- 12) No development shall take place until a detailed scheme for surface water drainage incorporating sustainable urban drainage principles has been submitted to and approved in writing by the local planning authority. The scheme shall include detailed management and maintenance arrangements for the lifetime of the development and shall be implemented in accordance with the approved details.
- 13) No development shall take place until a detailed scheme for foul water drainage has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented in accordance with the approved details.
- 14) No piling or any other foundation designs using penetrative methods shall take place other than with the express written consent of the local planning authority. Any such operation shall only be carried out fully in accordance with the detailed terms of any express consent granted.
- 15) No dwelling shall be occupied until a maintenance and management plan for the public open space within the site (as indicated on the Illustrative Layout Plan, drawing 1575-801 G and/or embodied in any reserved matters approval) has been submitted to and approved in writing by the local planning authority. The maintenance and management plan shall include provisions to ensure that the public open space is maintained and managed to reduce the possibility of pollutants entering groundwater and the risk to public water supply. The public open space shall be managed and maintained in accordance with the approved management plan for the lifetime of the development.
- 16) The development hereby approved shall be carried out in accordance with the recommendations of the Ecological Survey and Assessment by ERAP Ltd (Ref: 2014_208, May 2016), the accompanying Method Statement and the Reasonable Avoidance Measures therein.
- 17) There shall be no works to trees or vegetation clearance works between 1st March and 31st August in any year unless a detailed bird nest survey has been carried out immediately prior to clearance and written confirmation provided that no active bird nests are present, and this has been agreed in writing by the Local Planning Authority.
- 18) Prior to the erection of any external lighting an external 'lighting design strategy' shall be submitted to the local planning authority for approval in writing. The strategy shall identify areas/features on site that are

potentially sensitive to lighting for bats and show how and where the external lighting will be installed (through appropriate lighting contour plans.) All external lighting shall be installed in accordance with agreed specifications and locations set out in the strategy and thereafter maintained in accordance those approved details.

- 19) No development shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority to demonstrate that the development can achieve energy efficiency standards equivalent to Level 4 of the Code for Sustainable Homes. The development shall thereafter be carried out in accordance with the approved scheme.
- 20) Prior to the first occupation of any dwelling, that dwelling shall be provided with an electric vehicle charging point which shall be retained for that purpose thereafter.
- 21) The development hereby approved shall be carried out in accordance with the recommendations of the Tree Survey by Appletons dated 16 February 2016 submitted with the application. No development shall begin until details of the means of protecting trees and hedges within and immediately adjacent to the site, including root structure, from injury or damage prior to development works have been submitted to and approved in writing by the Local Planning Authority. Such protection measures shall be implemented before any works are carried out and retained during building operations and furthermore, no excavation, site works, trenches or channels shall be cut or laid or soil, waste or other materials deposited so as to cause damage or injury to the root structure of the trees or hedges.

* * *

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Alan Evans of Counsel

He called

Michael Molyneux BA MSc BTP MRTPI
Head of Planning Policy

FOR THE APPELLANT:

Ian Ponter of Counsel

He called

Ben Pycroft BA (Hons) Dip TP MRTPI
Associate Director, Emery Planning

Paul Sedgwick DipTP
Principal, Sedgwick Associates

FOR BROUGHTON PARISH COUNCIL:⁴⁵

Patricia A Hastings
BSc RN RM RNT PGDip Ed
(Chairperson)

She called

David R Mills, Parish Councillor
Leslie R Brown, Local Resident
Patricia A Hastings
(in her own capacity as witness)

INTERESTED PERSONS:

Councillor Neil Cartwright
Tim Brown BA MRTPI

Ward Councillor
tb Planning

INQUIRY DOCUMENTS

- ID1 Draft planning obligation (Appeal A)
- ID2 Statement of Common Ground (Appeal A)
- ID3 Opening Statement (Appeal A – Hollins Strategic Land)
- ID4 Opening Statement (Appeal B - Wainhomes)
- ID5 Letter dated 19/12/2014 from Brandon Lewis MP (then Minister of State for Housing and Planning) to PINS
- ID6 Officer report to Joint Advisory Committee on resumed examination of Central Lancashire Core Strategy
- ID7 Central Lancashire Authorities Publication Core Strategy DPD,

⁴⁵ Broughton In Amounderness Parish Council is the full and formal title

	Inspector's Report – May 2012
ID8	Proof of Evidence of Michael Molyneux BA MSc BTP MRTPI re APP/N2345/W/15/3007033
ID9	Opening remarks of Preston City Council
ID10	Opening Statement by Parish Council
ID11a	First draft of suggested conditions (Appeal A)
ID11b	First draft of suggested conditions (Appeal B)
ID12	Broughton-in-Amounderness Neighbourhood Plan: Landscape visual appraisal of small-scale housing sites (October 2017)
ID13	Letter dated 07/09/2017 from Ben Wallace MP to Mr Leslie R Brown
ID14	Internet article on housing development and traffic congestion in North West Preston – Lancashire Evening Post
ID15	'Blog' regarding operation of new Broughton Bypass
ID16	Statement of Tim Brown BA MRTPI
ID17	Statement of Councillor Neil Cartwright
ID18	Nos. 40 & 41 bus timetable
ID19	No 4 bus timetable
ID20a	Second draft of suggested conditions (Appeal A)
ID20b	Second draft of suggested conditions (Appeal B)
ID21	Parish Council's Closing statement
ID22	Closing statement (Appeal B - Wainhomes)
ID23	Closing statement (Appeal A – Hollins Strategic Land)
ID24	Costs application (Appeal A – Hollins Strategic Land)
ID25	Costs application (Appeal B - Wainhomes)

CORE DOCUMENTS

CD1.	Wainhomes - Committee report 15th June 2017
CD2.	Wainhomes - Minutes of Committee 15th June 2017
CD3.	Wainhomes - Decision Notice
CD4.	Hollins Committee report
CD5.	Hollins Minutes of Committee
CD6.	Hollins Decision Notice
CD7.	Central Lancashire Core Strategy
CD8.	Preston Local Plan
CD9.	Affordable Housing SPD October 2012
CD10.	2017 Housing Land Position Statement (base date 30th September 2017)
CD11.	2009 SHMA
CD12.	2013 Housing Needs and Demand Study
CD13.	2017 SHMA

- CD14. Draft Broughton Neighbourhood Plan March 2017
- CD15. Submitted Broughton Neighbourhood Plan
- CD16. Examiners Report Broughton Neighbourhood Plan September 2017
- CD17. Broughton Neighbourhood Plan October 2017
- CD18. BNDP representation Emery Planning/Wainhomes
- CD19. BNDP representation Sedgwick Associates/Hollins
- CD20. National Planning Policy Framework
- CD21. Suffolk Coastal District v Hopkins Homes & Richmond Estates Partnership LLP v Cheshire East Borough Council [2016] EWCA Civ 168
- CD22. Suffolk Coastal District v Hopkins Homes & Richmond Estates Partnership LLP v Cheshire East Borough Council [2017] UKSC 37
- CD23. 3167436 Appeal at Garstang Road, Barton, Preston
- CD24. 3160927 Appeal land at Pudding Pie Nook lane, Broughton, Preston
- CD25. 3130341 Appeal Land off Garstang Road, Barton, Preston
- CD26. 3007033 Appeal land at Preston Road, Grimsargh, Preston
- CD27. "Fixing our broken housing market" Housing White Paper February 2017
- CD28. 3173275 Appeal Land at Pear Tree Lane, Euxton, Chorley
- CD29. St Modwen Developments Ltd v East Riding of Yorkshire Council [2016] EWHC 968
- CD30. St Modwen Developments Ltd v East Riding of Yorkshire Council [2017] EWCA Civ 1643
- CD31. Oadby & Wigston Council v Bloor Homes Ltd [2016] EWCA Civ 1040
- CD32. 2200981 & 2213944 Appeal Land to the East and West of Brickyard Lane, Melton Park, East Riding of Yorkshire
- CD33. City & District of St Albans v Hunston Properties Limited [2013] EWCA Civ 1610
- CD34. Preston City Council Cabinet, 19 September 2017, Minute 42

- CD35. "Planning for the right homes in the right places: consultation proposals", DCLG, September 2017
- CD36. 3165490 Appeal Land to the south of Dalton Heights, Seaham, Co Durham
- CD37. Communities and Local Government Select Committee, Oral Evidence, HC 494, 1 November 2017
- CD38. Zurich Assurance v Winchester City Council and South Downs National park Authority [2014] EWHC 758
- CD39. Planning Advisory Service online; pas-topics/local-plans/five-year-land-supply-faq#15
- CD40. 3165930 Appeal land north and east of Mayfields, The Balk, Pocklington, East Riding of Yorkshire
- CD41. Preston Local Plan Inspector's report, June 2015
- CD42. Schedule of volume housebuilder, HCA and strategic land company sites, Preston, October 2017
- CD43. Wainhomes - Planning, Affordable Housing, Heritage and Design and Access Statement
- CD44. Hollins – Planning Statement
- CD45. Wainhomes Landscape and Visual Impact Assessment
- CD46. Wainhomes Layout
- CD47. Memorandum of Understanding Between Preston, South Ribble and Chorley.

APPENDIX 5:

Key Fold Farm Appeal Decision: Ref. 3179177



Appeal Decision

Inquiry Opened on 6 February 2018

Site visit made on 13 February 2018

by Keith Manning BSc (Hons) BTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 03 April 2018

Appeal Ref: APP/N2345/W/17/3179105

Land off Sandy Gate Lane, Broughton, Preston,

Lancashire PR3 5LA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Hollins Strategic Land LLP against the decision of Preston City Council.
 - The application Ref 06/2016/0736, dated 5 August 2016, was refused by notice dated 2 May 2017.
 - The development proposed is the erection of up to 97 dwellings.
-

Decision

1. The appeal is allowed and planning permission is granted for the erection of up to 97 dwellings at Land off Sandy Gate Lane, Broughton, Preston, Lancashire PR3 5LA in accordance with the terms of the application, Ref 06/2016/0736 , dated 5 August 2016, subject to the conditions set out in the Annex hereto.

Application for costs

2. At the Inquiry an application for costs was made by Hollins Strategic Land LLP against Preston City Council. This application is the subject of a separate Decision.

Procedural and Preliminary Matters

3. The inquiry was in respect of two appeals, conjoined for a single inquiry. For convenience they are respectively referred to, following my pre-inquiry note of 20 December 2017, as **Appeal A** (site A/appellant A) and **Appeal B** (site B/appellant B).
4. Both applications subject to appeal are for housing and are made in outline with all matters reserved except access, for which detailed approval is sought in each case.
5. The Inquiry sat between 6 and 9 February 2018, inclusive, and I conducted my formal visit to the appeal site on 13 February, combining this with my equivalent visit to the site of Appeal B.
6. **This decision is in respect of Appeal A.**

7. Appeal B is referenced APP/N2345/W/17/3179177 (LPA Ref 06/2017/0097). Site B is Keyfold Farm, 430 Garstang Road, Broughton, Preston, Lancashire PR3 5JB and the proposal in that case is for up to 130 dwellings. Appellant B is Wainhomes (North West) Ltd.
8. Each appeal is determined on its individual merits but, as there is much commonality between them in respect of policy context and other considerations, much of the evidence I was presented with and much of my reasoning, notably in respect of the first four of the main issues I have identified below (which are identical as between the two sites) is identical in each case. Matters specific to the site at issue in this appeal are of course reasoned specifically in this decision as necessary. Cross reference to the other appeal, as necessary, is to Appeal B, and joint reference, as necessary, is to both Appeals A and B.
9. Inquiry Documents (ID) may refer to, or be relevant to, one or both proposals, as the case may be; and the same principle applies to the Core Documents (CD) listed.
10. Pursuant to my pre-inquiry note, the appellants A and B combined to agree with the Council a 'Tripartite' Statement of Common Ground (TSoCG).
11. In addition, a Statement of Common Ground specific to this appeal has been agreed between Appellant A and the Council. I refer to this as SoCG (A).¹
12. The Broughton in Amounderness Parish Council ('the Parish Council') participated in the inquiry as a 'Rule 6 party' and I was told that it broadly represents the views of a sizeable proportion of Broughton village residents. Having read the letters submitted, both at application and appeal stage, I have no reason to doubt that; and on a personal note wish to record my appreciation of the courteous and considered manner in which it put its case.
13. Following the lunchtime adjournment on Day 2 of the Inquiry, as a consequence of answers given in respect of the housing land supply by its first witness, under cross-examination by the advocate for Appellant B², the Council informed me that it would no longer be pursuing its sole reason for refusal of both applications, as it was not in a position to defend it. Consequently, the evidence of its second witness, Mr Clapworthy, was formally withdrawn and the Council took no further part in the inquiry so far as matters of substance relevant to the case were concerned.
14. A further consequence is that the evidence of Mr Pycroft³, on behalf of both appellants, and that of Mr Sedgwick on behalf of this appellant, is effectively uncontested by the Council.
15. The appeal is supported by a planning obligation in the form of an agreement between the appellant, the Council, and the Lancashire County Council dated 9 February 2018. In brief detail this provides for financial contributions to primary education in the locality prior to specified thresholds of housing occupation, a travel plan contribution and for the provision of 35% affordable

¹ ID2

² Mr Ponter, advocate for this appellant (A), adopted in full Mr Fraser's cross-examination undertaken on behalf of Wainhomes (Appellant B)

³ Concerning housing land supply

housing under a programme tied to specified thresholds of occupation of the open market dwellings, so as to ensure full delivery of the affordable dwellings.

Main Issues

16. On the basis of my understanding of the substance and circumstances of the appeal, and agreement with the parties on opening the inquiry, I consider, in the context of relevant local and national policy, the main issues in this appeal to be identical to those in Appeal B, namely:-

- Does the Council have an adequate supply of housing land?
- Are the proposed developments adequately accessible to employment opportunities and services?
- To what extent would the proposed developments conflict with and harmfully undermine the strategic land use planning aims of the Council?
- To what extent would the proposed developments conflict with the aims of the emerging Neighbourhood Plan and what weight should be given to any conflict with those aims?
- Would the proposed development in this case give rise to any specific environmental or other harm and what weight should be accorded to such harm?

Reasons

Background: The site in its surroundings

17. The appeal site is described in the SoCG (A) but essentially comprises agricultural land with hedgerows and trees, currently down to pasture, between the south west margin of Broughton, as defined by the grounds of the high school (Broughton College), and the Grade II listed farmstead comprising Bank Hall and Bank Hall Farmhouse and the curtilage, from which the boundary of the appeal site stands clear. The eastern boundary of the site stands clear of the recently by-passed A6 Garstang Road (beyond which lies Appeal site B).
18. The proposed road access to the site is off the southern end of Sandy Gate Lane which, together with Moorcroft and Broadfield, serves part of an established area of suburban style housing north of Dobson's Farm, as well as the high school. The growth of Broughton west of this housing area appears to have been restricted by the presence of the West Coast mainline railway.
19. Much of the western boundary of the site south of the proposed access corresponds to the southern continuation of Sandy Gate Lane as a bridleway, which has in recent years been adapted to accommodate a lit section of the Preston Guild Wheel cycleway ('the Guild Wheel') which continues southwards to cross the railway via an overbridge. Beyond that point the Guild Wheel continues across the valley of the Woodplumpton Brook and from that point southwards across the M55 motorway and into the urban area of Preston itself.
20. From Sandy Gate Lane eastwards the Guild Wheel shares, initially, the high school access before following its southern boundary along an unlit route confined by the northern boundary of the appeal site. (The illustrative plan

supporting the application subject to appeal indicates the possibility of an alternative route for the Guild Wheel through the proposed housing site from the vicinity of Dobson's Farm, south of an existing pond within the site to re-join the original route near the eastern extremity of the site.) The sign post waymarking the Guild Wheel on Sandy Gate Lane includes reference to the Preston North East and Red Scar employment areas, which lie to the south of Broughton, the latter to the east of the M6 motorway.

21. South of the appeal site the land is mainly in agricultural use, ultimately dropping away into the valley of the Woodplumpton Brook before rising towards the M55 which follows higher ground to the south of the water course. In the distance, beyond the motorway, some of the new housing associated with the ongoing North West Preston development area is discernible from the vicinity of the appeal site.
22. The village of Broughton is centred on the crossroads formed by the A6 Garstang Road and the B5269 Woodplumpton Lane/Whittingham Lane. The recently constructed by-pass which runs east of the village from the vicinity of the M55 Junction 1, to a point on the A6 south of Barton via a roundabout junction with Whittingham Lane, has clearly had a significant effect; and a programme of consequential highway improvements facilitated by the removal of much through traffic is under way. A significant section of the by-passed A6 through the village is now subject to a 20 mph speed limit.
23. Historically, the village has witnessed ribbon development along Whittingham Lane in particular with some mid-twentieth century estate development in depth at Pinewood Avenue/Willowtree Avenue, but considerably more of the latter type of development west of the A6 north of Woodplumpton Lane and west of Newsham Hall Lane as far as the railway.
24. Other than those previously mentioned, services and facilities in and around the village currently include various local shops, some of a specialist nature, two filling stations, a public house, a police station, a restaurant, a dental surgery, the North West Ambulance Service NHS Trust, the Marriot Hotel and the Broughton-in-Amounderness Church of England Primary School. The Nos. 40 and 41 bus services (Lancaster - Preston) utilise the A6 Garstang Road and the No 4 bus service (Longridge - Preston) utilises the B5269 through the village.

Background: The policy framework

25. For the purposes of considering the main issues in both this case and that of Appeal B, the essential local and national policy framework is identical and is, for the most part, detailed in the TSoCG.
26. The National Planning Policy Framework, published in March 2012, is a powerful material consideration; but the starting point for determination of the appeals is of course the development plan. For present purposes⁴ the relevant components of the development plan are the jointly prepared⁵ Central Lancashire Core Strategy ('the Core Strategy'), adopted in July 2012 to cover

⁴ It is common ground (TSoCG paragraphs 2.15 and 2.16) that, whilst the Preston City Centre Plan, the saved policies of the Preston Local Plan (2004), the Joint Lancashire Minerals and Waste Local Plan and the Inner East Preston Neighbourhood Plan are also parts of the development plan, the parts relevant to the Appeals A and B are the Central Lancashire Core Strategy and the Preston Local Plan 2012 to 2026.

⁵ By Preston City Council, Chorley Borough Council and South Ribble Borough Council.

the period 2010 – 2026, and the Preston Local Plan 2012 – 2026 *Site Allocations and Development Management Policies* (‘the Local Plan’), adopted in July 2015.

27. Amongst other things, Policy MP of the Core Strategy effectively replicates, so far as decision-taking is concerned, paragraph 14 of the Framework. The “presumption in favour of sustainable development”, as defined therein, including the so-called “tilted balance” (as it is now generally understood) embodied in its second limb, is thereby enshrined in the development plan itself. This point was forcefully submitted by the advocate for Appellant B in closing⁶ who argued amongst other things that, in the absence of a five year housing land supply, the determination process defaults, by virtue of the development plan itself, entirely to the provisions of the Framework, rendering Policy 1 of the Core Strategy, for example, effectively irrelevant.
28. Whilst the logic of the point had been accepted by the relevant witness for the Council, that is not in fact the end of the matter, bearing in mind the need for me to consider the development plan as a whole. Although I was not referred to this by the parties, I note in doing so that the more recently adopted Local Plan carries a similar “model policy”, namely Policy V1. This applies only within the administrative area of Preston City Council and differs subtly from Policy MP of the Core Strategy in a number of ways. First, it clarifies beyond doubt that the reference in the third paragraph to absent or out-of-date policies is a reference to policies in the statutory development plan. Secondly and more significantly, in the words of paragraph 2.1 of the explanatory text, under the sub-title “Vision for Preston” (which concerns the ‘presumption in favour of sustainable development’ being seen as a ‘Golden Thread’ running through plan making and decision-taking), it seeks to... “ensure this presumption in favour of sustainable development at Preston district level.”
29. The third and final paragraph of Policy V1 is as follows:-
- “where there are no statutory development plan policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:*
- a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole and those contained in the Core Strategy;*
or
- b) specific policies in the Framework and Core Strategy indicate that development should be restricted.”*
- (The emphases are mine.)
30. Very arguably this policy has the potential to diminish, if not entirely negate, the force of Mr Fraser’s submission, when the logic embodied therein is applied. However, I am conscious that, unlike the second limb of paragraph 14 of the Framework, the policy carries no exemplification, equivalent to Footnote 9 of the Framework, of the sort of specific policies (in both the Framework and the Core Strategy) which indicate development should be restricted. Moreover,

⁶ ID22 paragraph 13

although the effect of footnote 10 to the Framework⁷ is embodied in the text of the policy, it also differs from the Framework insofar as the second limb to its paragraph 14 states that the presumption in favour of sustainable development means (in the circumstances specified) "granting permission unless..." (the specified policy 'test' is met), whilst the Policy V1 equivalent simply requires that the specified matters are "taken into account". There are therefore small but potentially significant inconsistencies with the Framework paragraph 14 which Policy V1 purports to emulate locally. Notwithstanding the advice of paragraph 15 of the Framework, and bearing in mind also the requirement in that for clarity, I therefore consider the advice on implementation in paragraph 215 of the Framework applies and the weight to be accorded to Policy V1 is to be reduced accordingly, whereas Policy MP of the Core Strategy is effectively on all fours with the Framework.

31. That said, I am not persuaded, all things considered, that Mr Fraser's submissions lead anywhere beyond a need for the above analysis of development plan policy, bearing in mind that, whilst the effect of paragraph 49 of the Framework concerning housing land is clear in its effect, the Framework is also emphatic as to the importance of the system being plan-led and it is well established law⁸ that engagement of the presumption in favour of sustainable development does not render policies in the development plan irrelevant, but rather affects the weight which the decision maker should consider according to them. Indeed, if Policy MP is intended to have the effect claimed by Mr Fraser it would itself be wholly inconsistent with the Framework to the extent that the latter supports the plan-led system.
32. The correct approach in circumstances where paragraph 14 of the Framework is potentially engaged, as here, is not therefore to entirely disregard the policies of the development plan, as Mr Fraser advocates, but rather, in the exercise of planning judgement, to consider the weight to be accorded to potentially determinative policies, alongside other material considerations, within the balance set by paragraph 14. That is the approach I therefore follow in the determination of both appeals A and B.
33. Policy 1 of the Core Strategy sets out its intention to concentrate growth and investment according to a hierarchy of established settlements and strategic sites. As a "smaller village", Broughton is a settlement at the bottom of that hierarchy, in category (f), which is referred to in the following terms: *"In other places – smaller villages, substantially built-up frontages and Major Developed Sites – development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional reasons for larger scale redevelopment schemes."*
34. The proposals at issue meet none of those criteria of scale and clearly do not represent redevelopment. It is common ground that the appeals A and B would both conflict with Policy 1(f).⁹
35. It is also common ground¹⁰ that both would conflict with Policy EN1 of the Local Plan. In the *"Open Countryside as shown on the Policies Map"*,¹¹ this limits

⁷ "Unless material considerations indicate otherwise."

⁸ CD22 *Suffolk Coastal District v Hopkins Homes & Richmond Estates Partnership LLP v Cheshire East Borough Council* [2017] UKSC 37

⁹ TSoCG paragraph 2.23

¹⁰ Ibid. paragraph 2.24

¹¹ i.e. Policies Map for the Preston Local Plan 2012 – 2016

- development to specified categories which large housing estates, such as those proposed in this instance, plainly do not fall within. Although the notation in the key to the Policies Map (presumably for clarity) indicates the Areas of Separation subject to Local Plan Policy EN4 (one of which includes both sites) to be a separate category, paragraph 8.11 of the policy explanation is abundantly clear that Policy EN1 for the protection of the Open Countryside applies within the Areas of Separation in any event. Moreover, it is clear that both appeal sites are effectively outside the Rural Settlement Boundaries indicated on the Policies Map for the purposes of Policy AD1(b) of the Local Plan and hence within the Open Countryside for development plan policy purposes, as acknowledged in the TSoCG.¹²
36. The TSoCG is, however, silent on the matter of potential conflict with Local Plan Policy EN4 concerning Areas of Separation, as this is neither acknowledged by the appellants nor alleged by the Council. Conflict with EN4 is, however, alleged by the Parish Council and individual local residents. This Local Plan policy originates from Policy 19 of the Core Strategy which, amongst other things, states that an Area of Separation will be designated “around” Broughton.
37. In addition to the above policies relevant to the main issues for both appeals A and B, I shall refer only as necessary to other specific policies in the development plan relevant to one or both appeals as the case may be.
38. The Broughton-in-Amounderness Neighbourhood Development Plan (‘the Neighbourhood Plan’) is in the course of preparation. It is proposed that the plan should cover the period 2016 – 2026. Its first iteration¹³ has been independently examined. However, as a consequence of that examination it has effectively been prevented from moving forward to the stage at which it would be ‘made’ and consultation on an amended plan under Regulation 14¹⁴ has been initiated by the Parish Council. The examiner’s report on the first iteration of the plan was received by the Parish Council on 9 September 2017.¹⁵ The examiner “*requested that the Plan should be amended and be subject to a further formal consultation, then be submitted for a further independent examination*”.¹⁶ The Parish Council published the amended plan in October 2017¹⁷ but it appears that the new Regulation 14 consultation has been procedurally challenged and has been repeated for safety, with consequent delay to the Regulation 16 consultation and subsequent examination.
39. It is common ground between the Council and both appellants A and B that, as at the end of January 2018, following the advice of paragraph 216 of the Framework, the emerging Neighbourhood Plan should attract “no more than limited weight” in the determination of the appeals. The Parish Council acknowledges the facts of the matter in the context of relevant procedure and guidance, but emphasises that the circumstances are unusual.

¹² TSoCG paragraph 2.24

¹³ CD15

¹⁴ Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

¹⁵ CD16

¹⁶ Foreword to October 2017 Neighbourhood Plan CD17

¹⁷ CD17

Housing land supply

40. Given the Council's concession that it could not correctly demonstrate a five year supply of deliverable housing sites and consequent effective withdrawal from the contest of the appeals, the first main issue can be addressed in relatively short order. The evidence of Mr Pycroft on behalf of both appellants A and B stands effectively uncontested and there was in any event no significant dispute over the figures to be used in the calculation so far as the individual components of supply were concerned, but rather the way those component figures were to be deployed. The relevant calculation equates to the period addressed by the Council's latest Housing Land Position Statement¹⁸, i.e. the five-year period 1st October 2017 to 30th September 2022. The relevant figures are clearly set out in Mr Pycroft's evidence at Table 3.2.
41. It is necessary, however, to consider certain elements of the calculation in principle in order to assess the magnitude of the acknowledged shortfall.
42. First of all, the 'Memorandum of Understanding' between the three Councils party to the Core Strategy (which has not to my knowledge been reviewed pursuant to its paragraph 7.1 and which was signed by Preston as recently as 3rd October 2017) confirms that, pending the adoption of a replacement local plan, the housing requirements of the Core Strategy are to be applied.
43. Amongst other things, this document recognises at paragraph 5.10 that meeting the housing requirement figures in the current Core Strategy ensures that the Objectively Assessed Need (as in the latest SHMA) is met in full across the Housing Market Area and that apportionment (between the Councils' respective areas) on the basis of the Core Strategy requirements will help to address net out-migration from Preston to other parts of the Housing Market Area.
44. The Memorandum also acknowledges that the Core Strategy has been examined and found to be sound in the context of the Framework. Bearing that in mind, the statutory Duty to Co-operate¹⁹, and also the object of national policy to boost significantly the supply of housing²⁰, I have no reason to question, on the evidence before me as it now stands, the underlying essential merits of what is effectively a joint declaration of intent as to how the Councils will for the time being distribute new housing between and across their respective and combined areas. I am also conscious that the ongoing housing requirements set out in Policy 4 are conceived of as minima.
45. It has been accepted by the Council that the base date of 2014 for assessing housing completions, used for the purposes of the current Strategic Housing Market Assessment (SHMA), is incorrect for the purposes of calculating the five-year supply of deliverable sites. Given that the accepted basis for the housing land requirement is the development plan, in this case the Core Strategy, as indicated in the Memorandum of Understanding, the correct base date going forward is 2010 as the Core Strategy covers the 16 year period 2010 – 2026.
46. The relevant Core Strategy policy for the purpose of calculating housing requirements, Policy 4, embodies the principle of addressing the backlog of

¹⁸ CD10

¹⁹ Pursuant to s110 of the Localism Act 2011

²⁰ Framework paragraph 47

- under-provision since 2003, in addition to the annual requirement from 2010, over the plan period to 2026. In Preston this has led to a significant accumulated backlog a little in excess of 1600 dwellings.²¹
47. Moreover, the evidence before me is persuasive that, effective though the Council's direct efforts to address ongoing vacancy in the older housing stock may be, the net effect of this on the overall supply of housing is effectively neutral and should therefore be discounted, as should the provision of student accommodation which, for a variety of reasons, appears not to have released existing stock for significant inclusion in the supply and in any event the data is patchy and not sufficiently reliable.
48. Although not labelling it as such, the Planning Practice Guidance effectively advocates the use of the so-called "Sedgefield" method to promptly deal with past under-supply or else rely on neighbouring authorities to assist under the Duty-to-Co-operate, but this would not be consistent with the spirit or intention of the Memorandum of Understanding to mitigate out-migration from Preston and the evidence before me²² is now entirely supportive of the Sedgefield approach.
49. The Framework at paragraph 47 advocates the addition of a small buffer of deliverable housing sites to the demonstrable five-year supply so as to ensure choice and competition in the market for land. However, where there has been a record of persistent under delivery of housing, a larger buffer should be added, so as to provide a realistic prospect of achieving the planned supply. The requirement in this circumstance is for an additional 20% on top of the calculated five-year requirement, as opposed to the 5% buffer to be deployed where this is not the case and the principal requirement is simply to facilitate choice and competition.
50. The Framework does not define what is meant by "persistent under delivery" and conclusions on this at appeal have inevitably varied according to evidence and submissions. I am constrained therefore to form my own conclusion on the basis of the evidence before me and the plain, ordinary meaning of the word 'persistent'. This is given in the *Compact Oxford English Dictionary* to hand as "continuing or recurring for a long time". (My emphasis)
51. The evidence demonstrates²³ that, year on year from 2003, there has been a recurrent, albeit not continuous (again, my emphasis) under-delivery of housing, sometimes very significant in numerical terms, that has resulted in a net cumulative under-delivery of housing in Preston of around 1,600 houses. Taking into account the years of under-delivery set against the lesser number of years of over-delivery, but more particularly bearing in mind the net outcome and the object of paragraph 47 of the Framework, I am persuaded that under-delivery has been 'persistent' and therefore counter to Framework intentions to boost significantly the supply of housing. The ongoing problem of under-delivery has not yet been addressed sufficiently in Preston for there to be a realistic prospect of achieving the planned supply consistent with that fundamental intention of national policy.

²¹ Evidence of Mr Pycroft paragraph 11.1

²² As summarised in ID22 paragraphs 18-21

²³ As summarised in ID22 paragraphs 22-24

52. Finally, the appellants call into question the delivery assumptions on a small number of larger sites and, whilst this is inevitably to some degree a matter of conjecture, it is informed by reasoning. Furthermore, as a consequence of the Council's effective withdrawal from the substance of the proceedings, the evidence in that respect has not in the circumstances been tested or challenged through cross-examination of Mr Pycroft and I therefore have no evidential basis to question the overall thrust of the appellants' conclusions regarding those sites.
53. Be that as it may, the adjustments arising would (given the above conclusions on how the principal components of the land supply should be addressed and on how the appropriate methodologies, policy and guidance should be deployed) be of marginal significance to the overall conclusion that the Council cannot currently demonstrate the requisite five-year supply of deliverable housing sites. On a proper footing, in the context of the relevant national policy and guidance, the adopted development plan and the Memorandum of Understanding between the councils party to it, the appellants' primary contention that the supply of deliverable sites is seriously inadequate, when set against what is required as a consequence of that context, cannot be gainsaid.
54. The worst case of only a little over 3 years' supply has been demonstrated and very largely, in effect, accepted by the Council. Even allowing for some positive variation from the appellants' conjectures about a limited number of sites in the supply, this would not improve significantly, and in broad terms I am satisfied that the supply, properly calculated in the context of relevant applicable policy, lies between 3 and 3.5 years only. To put it another way, the current supply of deliverable housing sites is at best only 70% of what is required by national policy as articulated in the Framework and is very likely nearer 60%. On any assessment, in the context of applicable local and national policy, that represents a very substantial shortfall.
55. I acknowledge that to local residents aware of permissions recently being granted elsewhere and the nearby developments at Preston North West, this may seem counter-intuitive; but the reality is that the calculation can only be done at recognised points in time (as supply is inherently dynamic) according to accepted conventions and guidance, and for the Council's administrative area only, given the manner in which the development plan is cast and the Memorandum of Understanding formulated.
56. Other appeal decisions touching on the issue of land supply and other matters can be material and my attention was drawn to a number as listed in the core documents and referred to in evidence. It is clear on reading them that each relates to a particular set of circumstances prevalent at the time and relies on the detailed evidence before the individual Inspectors. Ultimately, I must rely on the circumstances and detailed evidence put to me in respect of these appeals A and B and, given the Council's unequivocal concessions in respect of housing land supply, it serves no useful purpose to give undue consideration to conclusions drawn elsewhere.
57. The recent decision at Pear Tree Lane in Chorley²⁴, decided on the basis of all the evidence and submissions heard by the Inspector at the relevant inquiry, ultimately proved to be of peripheral materiality to the Council's accepted position on this issue. Although within the same Core Strategy area it relates,

²⁴ CD28

moreover, to different circumstances in a different local planning authority, as is clear from its concluding paragraphs,²⁵ albeit the Memorandum of Understanding is clear in specifically agreeing that the adopted development plan is currently the proper basis for determining the housing requirement within the individual local planning authority areas.

Accessibility

58. As I have noted, in the light of its acceptance of the generality of the appellants' joint case on housing land supply, the Council declined to pursue its reason for refusal which, following the officer's report, included the contention that Broughton is a (rural) village with low accessibility to local employment areas, shops and services such that "*unplanned and inappropriate expansion*" (with, clearly, in these cases, housing development) would "*fail to achieve the social and environmental dimensions of sustainable development*". On that basis, the proposals, it has been claimed, would fail to focus development at an appropriate location, contrary to the development plan and the Framework.
59. The Parish Council emphasised, amongst other things, its concurrence with the analysis in the officer reports and the substance of the Council's decision.²⁶ Individual residents have supported the Council's original stance, both explicitly and implicitly. Accessibility therefore remains to be considered as a main issue notwithstanding the position latterly adopted by the Council at the inquiry.
60. I am conscious that Policy 1 of the Core Strategy plans for a development pattern that, for the whole of Central Lancashire, concentrates development according to a settlement hierarchy within which the Preston /South Ribble Urban Area occupies the top tier (a) and smaller settlements including Broughton are included in the lowest tier(f). I place little weight on the appellants' repeated emphasis that the lack of settlements within the intermediate tiers is a significant factor in support of their appeals. The Core Strategy, which addresses the relevant housing market area, self-evidently transcends administrative boundaries so far as the settlement hierarchy itself is concerned. In planning terms the lack of intermediate tiers within Preston is not therefore, in my view, an important or influential factor.
61. Equally, I do not share the erstwhile apparent view of the Council that, because the spatial strategy embodied in the Core Strategy is driven by considerations of sustainability and considered to support and promote a sustainable pattern of development, departures from the articulated aspiration are to be presumed unsustainable. The strategy reflects a policy choice which is considered to optimise the settlement pattern in sustainability terms. Variations on the theme are not necessarily unsustainable in planning terms, not least in view of the definition of sustainable development set out in the Framework at paragraph 6.
62. It is very apparent that Broughton has expanded beyond its early nuclei in certain decades of the last century through the addition of ribbons and, more pertinently, estates of housing. This tendency has been largely but not exclusively concentrated around the east-west axis formed by the B5269 Woodplumpton Lane/Whittingham Lane. The facilities at the centre are readily accessible on foot from much of the village and those facilities would be

²⁵ CD28 paragraphs 63 -71

²⁶ Evidence of Patricia Hastings paragraph 2.1

- similarly accessible to residents of the two developments proposed. That is a simple function of the geography of the settlement.
63. It remains to be seen whether the recent construction of the by-pass will prompt closure or expansion of established businesses or stimulate positive response to new opportunities arising from improved conditions on the principal thoroughfare in particular. Mr Sedgwick's conjecture that an increased population would be beneficial for established and, potentially, new businesses in the village seems to me to be entirely reasonable given the accessibility of the appeal sites to the existing centre.
64. Certain facilities including the church, the hotel, the ambulance service headquarters, the primary school and to some extent the high school, would be more accessible to prospective residents of the proposed housing estates than many existing residents. This is because the linear form of the village would change to a squarer form with most of the latterly mentioned facilities being located on its southern margin.
65. Despite its adjacency to a railway, the settlement lacks a station but the cruciform thoroughfares are adequately and in some respects well served by buses connecting the settlement to distant Lancaster including its University, nearby Preston including the Royal Preston Hospital, Longridge, Garstang, Fulwood and various other settlements. The journey to the centre of Preston is timetabled at around half an hour. The timetables submitted demonstrate the manner in which the bus services operate.²⁷
66. The settlement does lack a supermarket at present but some convenience goods for top-up shopping are available at one of the two filling stations presently open in the village. For obvious reasons, it is an established and widespread practice for car owners to use their vehicles for a weekly shop in any event, even if they have a choice of transport modes or live relatively close to a supermarket.
67. Of particular note is the Preston Guild Wheel, a 21 mile cycling and walking route which encircles the city providing access not only to its more central area but also to a variety of leisure and employment destinations in the surrounding area. Broughton, including the proposed housing sites at issue, has direct access to the route.
68. All in all, I do not consider Broughton to be notably poorly served in terms of access to services and facilities or choice of transport modes. It is a core principle of the Framework, underpinning both plan-making and decision-taking, to "*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*" Policy 1 of the Core Strategy notwithstanding, I do not consider the proposed developments would offend that principle. If anything the reverse is true. They would be well located in those terms by comparison with housing sites associated with many freestanding settlements and the initial stance of the Council on this issue does not in my view withstand scrutiny.

²⁷ ID18 & ID19

Strategic land use planning aims

69. It is recognised by all parties that the proposed developments at issue would both conflict with Policy 1 of the Core Strategy. No other position would be tenable. They simply do not accord with the policy choice which has been made locally to concentrate development in accordance with a specified hierarchy. Oft repeated without good reason, developments such as those proposed would be insupportable in the context of a plan-led system. Individually, and more especially cumulatively, the pattern of development sought by the Core Strategy would be eroded, and the object of promoting it would be undermined.
70. However, the underlying rationale of the policy is the achievement, essentially, of a spatial pattern of development that is sustainable and the degree of harm to that aspiration is tempered to a significant degree in the case of these appeals by my conclusions on the previous issue regarding accessibility. The conflict with the policy itself is greater than the conflict with its originating intentions. That might well not be the case in a more remote and less accessible location or in a settlement lacking, for example, very necessary schooling facilities.
71. Moreover, the strategic land use planning aims of the Council, include, explicitly by virtue of Policy MP of the Core Strategy, the presumption in favour of sustainable development and the triggering of the so-called “tilted balance” by its inability to currently demonstrate a five-year supply of deliverable housing sites, following on from the circumstances anticipated by paragraph 49 of the Framework and the contextual priority to boost significantly the supply of housing as set out in paragraph 47 of that current expression of national policy. It thus follows that the weight to be accorded to the planning aim of delivering housing vis-à-vis the planning aim of accordance with a set hierarchy of settlements is increased commensurately.
72. To some extent the weight to be accorded to housing delivery in this context is counter-balanced by Policy V1 of the Local Plan, albeit for the reasons previously given I do not consider that to be particularly effective in that regard.
73. Nevertheless it is necessary to consider the potentially restrictive effect of Local Plan Policy EN4 concerning Areas of Separation, which also gives site-specific effect, within Preston, to Policy 19 of the Core Strategy.
74. There is no evidence to suggest that EN4 is a policy of restriction equivalent to, for example, Green Belt or comparably restrictive policies set out in Footnote 9 to the Framework. I am, however, conscious of the judicial approach in the Supreme Court in the case of *Hopkins Homes*²⁸. This is clear that a policy such as EN4 should not be regarded as a policy for the supply of housing rendered out-of-date by inadequate supply by reason of paragraph 49 of the Framework; and the same principle applies to Policy EN1 of the Local Plan, which all parties acknowledge to be offended by the proposals.
75. Although neither the appellants nor the Council consider policy EN4 to be offended by the proposals, that is not a position shared by the Parish Council and concerned residents from the locality including Mr Timothy Brown.²⁹

²⁸ CD22

²⁹ ID16 and representation dated 04/10/17 from TB Planning

Whether or not there is conflict with this policy and, if so, the extent to which such conflict would harmfully undermine the strategic land use planning aims of the Council is central to my consideration of this main issue and the ultimate planning balance.

76. First, I am clear that, in essence, policy EN4 is driven by considerations of urban form rather than landscape protection, a point which the relevant witness for Appellant A, in response to my question on the point, did not dispute.
77. Secondly, I set relatively little store by the submissions of Appellant B suggesting the fact that the emerging Neighbourhood Plan is contemplating housing in the same area of separation is of note.³⁰ The scale and location of the proposal is not comparable, albeit the suggestion does tend to underline the general principle that the Area of Separation, as currently defined on the Local Plan Policies Map, is not necessarily intended to be inviolate.
78. That much is in any event apparent from the careful analysis in the officer's reports on both applications subject to appeal, which clearly underpin the Council's view that neither proposal is contrary to the thrust of Core Strategy Policy 19 or Local Plan Policy EN4. The lack of conflict with the development plan in that respect concluded by the Council was reflected in the omission of reference to those policies in its decision notices. Whilst I set some store by the careful analysis undertaken, I do not entirely agree, however, with the overall conclusion.
79. The parent Policy 19 in the Core Strategy is, according to the explanatory paragraph 10.14 of that document, concerned to maintain the openness of countryside in those parts of Central Lancashire where there are relatively small amounts of open countryside between settlements. Amongst other things, the policy is explicit that their identity and local distinctiveness is to be protected by the designation. Policy EN4 of the Local Plan interprets the intention of Policy 19 within the consequentially defined Areas of Separation within Preston in the following terms:-
- Development will be assessed in terms of its impact upon the Area of Separation including any harm to the effectiveness of the gap between settlements and, in particular, the degree to which the development proposed would compromise the function of the Area of Separation in protecting the identity and distinctiveness of settlements. (The emphasis is mine.)*
80. Although it is notable from the Policies Map that the defined area of Separation between Grimsargh and the Preston Urban Area is significantly narrower at its narrowest point than the Area of Separation between Broughton and the Preston Urban Area, the latter is fairly narrow nonetheless. It therefore seems to me that any development of significance within it has the potential to compromise its function to some extent, simply by the fact of reducing its extent. In the case of the appeal sites A and B combined, this would be across a broad front as the physical extent of Broughton would effectively be advanced southwards towards the Preston Urban Area. There would inevitably, in purely physical terms, be some harm to the effectiveness of the gap between the two settlements, as distinct from the perception of that gap so far as local residents and those travelling between the settlements is concerned. The

³⁰ ID22 Paragraphs 44 & 48

remaining gap would be smaller and more vulnerable to perceived or actual closure in the event of further development.

81. Having said that, it is true to say that the world is not perceived in two dimensions, as on a plan or policies map, but rather in three dimensions with, in reality, topographic and visual features such as vegetation playing a significant role. Thus it is that a relatively large gap on a featureless plain may be perceived as comparable in local identity terms to a comparatively small gap in more complex surroundings. I can appreciate that it is this principle which effectively underlies the analysis set out in the officer's reports to which I have previously referred.
82. In terms of the thrust of the policies 19 and ENV4, the emphasis on the degree to which the particular developments proposed would compromise the function of the Area of Separation in protecting the identity and distinctiveness of the settlements concerned adds a further layer of complexity to the consideration of whether the objects of the policies would be significantly harmed. It seems to me that the minimum requirement is for sufficient separation for them to be effectively recognised as separate places.
83. All in all, therefore, it seems to me that, at the most basic level of analysis, the two proposals at issue must, individually and collectively, bearing in mind the site-specific definition of the Area of Separation in the development plan, conflict in principle with its policy object of maintaining the separateness of Broughton as a settlement distinct from the Preston Urban Area; not least in view of their scale and location on the southern margins of Broughton as defined for the purposes of Policy AD1 of the Local Plan. The reality of the matter is that the two settlements as currently defined in terms of the Policies Map, and in terms of physical presence, would become closer together.
84. However, it is clear from the policy as set out that the magnitude of the potential harm to its objects in any particular case is a matter of fact and degree and, moreover, susceptible to mitigation in practice. That being so, the nature of the development, in terms of potential density, design, landscaping, layout and so forth must also be influential in that judgement. The fact that the developments at issue are proposed in outline does not in any definitive way assist on that score but, equally, there is sufficient information on those factors to form a view in principle and, clearly, those particular factors fall to be weighed in the balance of harms and benefits in determining each of the appeals A and B on its individual merits.
85. In conclusion on this issue, it is clear and uncontested that both proposals conflict with the development plan so far as Core Strategy Policy 1 and Local Plan Policy EN1 are concerned. It follows that they would not accord with Local Plan Policy AD1(b) which contemplates small scale development within Broughton. I have also identified a basic in-principle conflict with Policy EN4 of the Local Plan concerning the Area of Separation between Broughton and Preston, albeit such conflict is susceptible to mitigation according to circumstances and individual merits.
86. It has been submitted that Policy MP of the Core Strategy has, in circumstances where paragraph 49 of the Framework is engaged by reason of a shortage of deliverable housing sites (and other circumstances where relevant policies are out of date or non-existent), the practical effect of overriding all other development plan policies. Whilst it is well recognised that development

plan policies can pull in opposing directions and indeed that is to some extent inevitable and therefore entirely normal, I consider, for the reasons previously given, that such an interpretation would be wholly incompatible with the planned system, if taken to the extreme. All manner of development plan policies would be uncritically overridden in pursuit of housing supply. Notwithstanding the priority given to substantially boosting it embodied in the Framework, it cannot on the face of that document be the case that housing supply must necessarily be boosted at the expense of all other policy considerations.

87. Therefore Policy MP does not, in my view, even given the acknowledged housing land shortfall, make the proposals at issue four-square with the development plan itself. Rather it requires the application of the so-called 'tilted balance' of Paragraph 14 of the Framework. Given that I have concluded there would be conflict with the strategic land use planning aims of the Council, which would have the potential at least to harmfully undermine them, that conflict and potential for harm is a consideration to be weighed in the balance in considering whether one or both proposals at issue represent sustainable development.

Neighbourhood Plan

88. Although the Neighbourhood Plan had previously progressed to a relatively advanced stage, prematurity was not cited as a reason for refusal by the Council and has not, as such, been put to me specifically as a consideration by the Parish Council, which acknowledges that, in procedural terms, it now still has some way to go as a consequence of the Examiner's report preventing it from being made, ultimately, as a consequence of a successful referendum.
89. Although I have read that report and am aware of its content, conclusions and recommendations, its merits are not a matter for me and I can accord it only limited weight as a material consideration in any event, as is the case with the emerging Neighbourhood Plan itself, notwithstanding what the Parish Council considers to be the unusual circumstances. The Neighbourhood Plan does not yet form part of the development plan, there are unresolved objections to it and its final content has yet to be resolved following a further examination.
90. My responsibilities are distinct from those of the examiner who will, in due course, conduct a fresh examination and report whether the basic conditions are met, in which case the way forward to a referendum would be cleared. In order to meet the basic conditions the making of the Neighbourhood Plan must be in general conformity with the strategic policies contained in the development plan for the Preston administrative area and it is the examiner's responsibility to assess whether or not that is the case. I, on the other hand, am charged with the responsibility of determining both appeals A and B now, in accordance with usual practice (in the knowledge that both appellants themselves recognise that their proposals conflict with both Policy 1 of the Core Strategy and Policy EN1 of the Local Plan) in the light of the evidence before me. But I see no justification in relevant policy or guidance for delaying those decisions as Mr Brown requests.³¹ Such an approach, in principle, would have significantly deleterious implications for the efficacy of the appeals system.

³¹ ID16 paragraph 27.0

91. The aims of the emerging Neighbourhood Plan are spelt out in the latest draft.³² These are tenfold and in summary are as follows:- retention of rural setting; appropriate scale of development; appropriate form and location of housing development; support for local businesses; vibrant local centre; conservation of heritage and improvement of environment in light of the removal of through traffic; enhanced leisure and recreation; promotion of health and well-being; successful integration of major new housing on the southern and eastern edges of the plan area (i.e. the parish as opposed to the village core); and the safeguarding of the qualities of the surrounding countryside.
92. Insofar as those general aims pull in the same direction as development plan policy which the Council and the appellants acknowledge to be offended by the appeal proposals (notably Core Strategy Policy 1 and Local Plan Policy EN1), or which I have otherwise concluded to be at least potentially at variance in principle with what is proposed (notably policy EN4), then I consider them to reinforce such policy intentions. However, insofar as specific policies and proposals in the Neighbourhood Plan still have some way to go before being incorporated into the statutory development plan, the weight, as the local planning authority acknowledges,³³ remains limited nonetheless. Moreover, pending the Neighbourhood Plan being formally made, a supply of only three years deliverable housing sites continues to engage the "tilted balance" set out in paragraph 14 of the Framework.³⁴
93. All in all, and notwithstanding the progress made and the effort undertaken by all concerned, I am constrained to give limited weight only to any conflict with the aims of the emerging Neighbourhood Plan per se.

Considerations specific to Appeal A

94. The final main issue I have identified concerns site-specifics and the following paragraphs therefore refer exclusively to Appeal Site A unless I indicate otherwise.
95. Situated on the south-west margin of the settlement, this elongated site wraps around the site of the high school and stands clear of Bank Hall and Bank Hall Farmhouse in deference to the listed status of the farmstead. Vehicular access would be taken from Sandy Gate Lane to the south of the high school entrance. The overall site size, the number of houses proposed and the illustrative plan all point to a comparatively low density scheme (circa 15 dwellings per hectare overall³⁵) with ample scope for generous gardens, open space to contain the proposed alternative route for the Guild Wheel through the site, retention of existing trees and generous landscaping.
96. The main public prospects of the site would be from Sandy Gate Lane itself, the high school and its grounds, the Guild Wheel along their common boundary with the site and its continuation southwards towards Preston as far as the rail overbridge. From all these points it appears part of quite an open, pastoral landscape on the fringe of the built up area of the village, albeit of relatively limited scenic quality in itself in my estimation. There would be a limited

³² CD17 paragraph 5.2

³³ TSoCG paragraph 2.35

³⁴ *Richborough Estates and others v Secretary of State for Housing, Communities and Local Government* [2018] EWHC 33 (Admin) - (Case concerning Written Ministerial Statement of 12 December 2016).

³⁵ Calculated on basis of application form

potential view of built form from the A6 Garstang Road, but this would be considerably mitigated by distance across intervening land and existing vegetation.

97. I am conscious that the evidence base of the emerging Neighbourhood Plan includes a landscape/visual appraisal of potential small-scale housing sites published in October 2017³⁶ and that, within this, Site L comprises the north-western extremity of the appeal site at Sandy Gate Lane and refers to openness as part of an agricultural landscape co-incident with the impression I have formed. Although this contributes to its relatively low ranking as a potential housing site, it is conceived of as a different, smaller, denser (25 dwellings per hectare assumed) site with less scope overall for mitigation of impact at the site margins through design and landscaping or provision of a comparably improved alternative route for the Guild Wheel at this location. Moreover, it has been produced for comparative purposes in the context of the emerging plan to which I can accord only limited weight and is of correspondingly limited assistance in the determination of this appeal.
98. The character and appearance of the appeal site and its immediate environs as open countryside on the rural fringe of the village would of course be changed and influenced by the proposed development, as must always be the case when greenfield land such as this is developed. However, the illustrative layout demonstrates that (with a modicum of adjustment) it should be possible to develop the site in a manner which, given its comparatively low density, is sensitive to its location on the rural fringe of the village and, if housing development is to be permitted in principle at this location, I would consider such an approach to be fundamental to its acceptability, even if that were ultimately to reduce numerical housing delivery at reserved matters stage.
99. It seems to me that this site, whilst carefully configured with the aims, amongst others, of preserving at least some of the setting of Bank Hall Farmhouse and standing back from the A6 Garstang Road, is at a critical point of transition between Broughton and the more obviously rural area to the south as far as the M55. Moreover, it sits within the defined Area of Separation (subject to Local Plan Policy EN4 pursuant to the principle established in Core Strategy Policy 19) between Broughton and houses recently constructed on the large area being developed on the allocated sites at North West Preston. In winter these are visible from the northern margins of the site in the distance beyond the motorway, albeit in the absence of details it is unclear to what extent landscaping as part of that development would obscure their visibility in due course.
100. In summer, I would anticipate that the overlap of trees and hedgerows across the intervening landscape would reduce if not altogether obscure them from the margins of Broughton in any event, but a strong southern boundary to the proposed development would be required to mitigate intervisibility between Broughton and the neighbouring city, so as to at least visually maintain the function of the Area of Separation in protecting the identity and distinctiveness of the settlements, thereby retaining a perception that Broughton is separated from Preston by an appreciable swathe of countryside rather than simply the motorway itself.

³⁶ ID12

101. Although the absolute extent of the Area of Separation would be reduced, there is nonetheless considerable scope for mitigation of harm to its fundamental intentions in the context of a well-conceived layout that is not overly ambitious in terms of housing density. Such a scheme would tend to accord with the analysis set out in the officer's report, thereby reducing, albeit not eliminating altogether, conflict with the policy intention of protecting identity and distinctiveness. Users of the Guild Wheel and any other routes across the intervening remaining countryside between the settlements would retain a sense of departure and arrival, plus some sense of rurality within the remaining Area of Separation.
102. I am required by reason of the primary legislation³⁷ to pay special attention to the desirability of preserving the setting of Bank Hall and Bank Hall Farmhouse. Insofar as this plainly includes the farmland generally surrounding them as the context in which they are experienced, the appeal site would undoubtedly alter it. I do not entirely agree therefore with the submitted heritage statement which concludes that the "application site is located outside of the heritage asset's setting".³⁸ The heritage asset is plainly visible across the application site from the north where the Guild Wheel passes closest to it, certainly in winter when hedgerow vegetation is less effective, albeit that within a farming landscape the planting of a woodland can reduce the physical extent of such a setting in the normal courses of events. That is part of the normal evolution of the setting and has little impact on significance, much of which derives in this case from internal features in any event. Nevertheless, loss of perceptible agrarian setting would be a negative outcome in terms of the setting of the farmstead and would to some extent diminish its significance.
103. That said, I am satisfied that a more robust approach to the landscaping of the area between the heritage asset and the nearest section of the Guild Wheel than is indicated on the illustrative plan referenced 1575-801 would substantially assist in preserving the setting and mitigating what I would consider to be less than substantial harm to its significance in terms of the objectives of paragraph 134 of the Framework, specifically, and the similar intention of the development plan through Policy 16 of the Core Strategy and Policy EN8 of the Local Plan; albeit the former is not entirely consistent with the relevant paragraph of the Framework, which requires a balance of harm against public benefits. I am, moreover, satisfied that the determination of reserved matters is potentially capable of being an adequate safeguard in these respects.
104. It is common ground³⁹ between the Council and the appellant that there are no irresolvable objections to the proposed development on grounds of landscape or visual impact, ecology, highways or flood risk and drainage considerations. I have no authoritative evidence sufficient to gainsay that position, albeit many concerns raised by local residents are in respect of such matters. In particular there is a concern over highway safety and congestion bearing in mind the proximity to the high school. However, it seems to me that such congestion as does occur is a consequence of parental behaviour in using cars to pick up and drop off children at school times. This is a widespread tendency throughout the country, ultimately resolvable, if persistent, only by

³⁷ Planning (Listed Buildings and Conservation Areas) Act 1990 s66(1)

³⁸ Paragraph 4.1 of the submitted statement

³⁹ SoCG (A)

- specific local management measures. The highway authority is in any event clear that the proposed access arrangements are safe and that residual network effects are in principle acceptable. They would certainly not be severe such as to justify refusal on the basis set out in paragraph 32 of the Framework.
105. Logically, given the proximity of the site to the school, there is unlikely to be significant additional parking pressure around the school arising from the proposed development and I am content that the interaction of the proposed access with the existing route of the Guild Wheel and the alternative put forward within the application site would, in principle, be acceptably safe. Moreover, the provision of the alternative proposed would obviate the necessity for users of the Guild Wheel to share the access to the high school - an attribute which I consider would make a positive contribution to highway safety. Ultimately it is the responsibility of all - motorists, cyclists and pedestrians - to interact safely with each other, within the confines of shared infrastructure where that is necessary, and there is nothing inherently unusual or unsafe about the arrangements proposed here to assist that process.
106. Nor do I accept that the enjoyment of the Guild Wheel would be significantly curtailed by what is proposed. A significant rural stretch would remain immediately south of the appeal site. Furthermore the existing Guild Wheel route between the site and the high school initially shares the access of the latter, is narrow, confined in nature, unlit and subject to angular turns. The alternative proposed, although characterised by the housing proposed primarily to the south of it, would nevertheless be gently curving, lit, and (as illustrated) significantly enhanced by potentially pleasant associated landscaping and open space. In the context of the varied nature of the route as a whole, I cannot accept that this would be a significantly harmful proposition. On the contrary, it has the potential to offer a significant improvement to a short stretch of this important local routeway.
107. Overall, for the above reasons, I consider the site-specific characteristics of the proposed development to be well conceived if only largely illustrative at this stage. The proposed development does have the potential to cause a degree of environmental harm insofar as it impinges on the setting of a listed building, albeit that can be largely mitigated through layout and design. Clearly it would involve the loss of open pasture at the fringe of the village but I have no persuasive evidence to suggest that this is valued landscape in the terms of paragraph 109 of the Framework and it is not best and most versatile agricultural land.
108. There is plainly a conflict with the intentions of Core Strategy Policy 1 and Local Plan Policy EN1, as previously explored. Moreover, the proposed development would conflict to a degree, in my view, with the intentions of Local Plan policy EN4 concerning maintenance of an area of separation, albeit the impact of that is susceptible to potentially significant reduction through careful detailed design, such that the perception of prospective merger with Preston and consequent loss of community identity could be mitigated to within acceptable limits. Conflict with development plan intentions is clearly a form of harm within a genuinely plan-led system which has to be set against other material considerations.

109. The weight to be accorded to the harms I have identified is a matter to which I return in the planning balance.

The planning obligation

110. The agreement entered into is a simple form of obligation which would over an appropriate timescale mitigate the impact of the development on the local primary school, provide for the encouragement of sustainable transport habits and deliver 35%⁴⁰ of the housing as affordable housing in accordance with development plan policy.

111. All the obligations in the document are necessary, proportionate and directly related to the proposed development and, in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, I am therefore able to accord them weight in my decision. I have not been advised of any prospective breach of Regulation 123 regarding pooled contributions.

Conditions

112. Leaving aside the main issues, and the scope of the planning obligation to mitigate certain impacts of the development, I am conscious that many other matters raised by individual local residents and the Parish Council in connection with the outline application subject to appeal are capable of being addressed by conditions or otherwise taken into account at reserved matters stage.

113. The Council suggested a range of potential planning conditions (SC)⁴¹ which were discussed at the inquiry. Although I consider them to be necessary and otherwise appropriate in the light of relevant policy and the Planning Practice Guidance, a number are complicated in expression to the extent that it would potentially reduce their robustness and efficacy; and it was agreed that simplification and/or closer adherence to established model conditions would be required in the event of the appeal being successful, as would the removal of duplication.

114. SC1 - SC3 relate to the definition and timescale for submission of reserved matters, the life of the outline permission sought and its definition by reference to specified drawings in the conventional fashion but would require some re-ordering and rewording as 4 separate conditions.

115. It was agreed that it would be necessary to define the permission not only by reference to plans but by specifying the maximum number of dwellings (97) to be constructed on the site. Over and above the need to define the permission with clarity and certainty, my additional reasons for considering such a condition to be necessary in this case are referred to in my reasoning.

116. SC4 and SC13 represent unnecessary duplication bearing in mind that a standard form of condition to control construction methods could be imposed, suitably adapted to encompass these and associated environmental pollution risks more efficiently and comprehensively.

⁴⁰ c/f erroneous reference to 30% at paragraph 6.5 of Mr Sedgwick's evidence

⁴¹ ID20a

117. SC5 concerns the potential for parts of the site to be contaminated for one reason or another but is excessively complicated. It was agreed that it would need to be simplified.
118. SC6 and SC7 concern the implementation of highway works and the proposed alternative route for the Guild Wheel and would be, subject to some re-wording, necessary.
119. SC8 concerns the submission and approval of a travel plan to encourage sustainable travel habits from the outset. It was therefore agreed that the proposed threshold of occupation would be irrelevant and that the travel plan would need to be in place prior to any dwelling being occupied.
120. SC9 concerns wheel cleaning of construction vehicles and would most appropriately be incorporated in the construction method statement previously referred to.
121. SC10 – SC12 variously concern foul and surface water drainage but are excessively and unnecessarily complex. A much simpler approach is to be preferred and the use of sustainable urban drainage principles in the case of the surface water arrangements should be maximised. SC14 would be necessary because Site A has the potential to affect an aquifer if piling or other penetrative foundation techniques are used.
122. SC15 would also be necessary in the case of Site A because the detail of managing and maintaining open space is not otherwise provided for in the planning obligation.
123. SC16, SC17 and SC18 would be required in the interests of maintaining and enhancing biodiversity.
124. SC19 and SC20 would be required to promote energy efficiency and encourage and facilitate more sustainable travel in accordance with local and national policy objectives, including, respectively Policy 3 and Policy 27 of the Core Strategy and, bearing in mind the spirit of the Written Ministerial Statement of 25 March 2015, the requirement in respect of equivalence to Code Level 4 is a reasonable one.⁴²
125. Logically, and for consistency, a condition equivalent to SC10 proposed by the Council in the case of Appeal B, to ensure that management and maintenance of the estate roads is put on a proper footing, would be required.
126. Finally, I consider, and it was agreed, that a condition to protect trees on the site, equivalent to that proposed by the Council in the case of Appeal B, would also be necessary.

Planning balance and overall conclusion

127. The proposed scheme of housing development clearly conflicts with the intentions of the adopted development plan in a number of respects as I have explained. But that of course is not the end of the matter, bearing in mind the

⁴² Policies requiring compliance with energy performance standards that exceed the Energy requirements of Building Regulations can be applied until commencement of amendments to the Planning and Energy Act 2008 in s43 of the Deregulation Act 2015 (not yet in force). At this point the energy performance requirements in Building Regulations will be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4. Until the amendment is commenced conditions should not set requirements above a Code level 4 equivalent.

powerful material consideration of the Framework and, more specifically its explicit intention to boost significantly the supply of housing.

128. Although the policies with which the proposed development conflicts are not policies for the supply of housing as such and may be accorded weight as adopted policies of the development plan, even in circumstances of housing land shortage, by contrast with those of the yet-to-be-made Neighbourhood Plan to which I can accord only limited weight, there are significant benefits potentially arising from the development and a more rounded assessment is required, bearing in mind that application of such policies with full rigour could have the effect of frustrating that important intention of the Framework concerning housing supply.
129. The economic benefits of new housing development are well appreciated, both in terms of the direct stimulus to the local economy and in terms of indirect benefit to local enterprise requiring a local labour force. Moreover, I am persuaded that, more probably than not, the new housing proposed will have positive consequences for local businesses and the provision of services in the village centre. It is logical that should be so, given the increased customer base, not least in the context of consequential and potential improvements facilitated by the removal of through traffic on the A6 Garstang Road. It is, moreover, logical that the cumulative effect of both appeal proposals A and B would be commensurate in terms of that particular benefit.
130. Bearing in mind the potential for biodiversity enhancement at the detailed design stage, the environmental impacts are broadly neutral in the balance. Clearly there would be loss of open pasture to the south of the village and some reduction, in absolute terms, in the actual separation from Preston and perception of that, but much can be done, in all the circumstances, to effectively mitigate the latter. Impact on the setting of Bank Hall and Bank Hall Farmhouse could be effectively mitigated at reserved matters stage and the harm to its significance would be not only less than substantial but markedly at the lower end of that spectrum of harm in, my assessment, and falls to be weighed against the public benefits of the development in any event.
131. In social terms, these benefits would be substantial. Open market housing is needed but more particularly it is clear from the evidence⁴³ that in this locality, as in many places, the provision of a significant amount of affordable housing is a benefit to which very considerable weight should be given.
132. I am also conscious that, notwithstanding local opposition to the development on a variety of planning grounds considered above or otherwise capable of being addressed through condition or obligation, there is a lack of objection from consultees other than the Parish Council⁴⁴ and that the Council's single reason for refusal has not, in the event, been sustained.
133. Given those circumstances, the statutory presumption in favour of the development plan must be seen in the light of the material considerations in favour of the proposal and on the ordinary balance of planning advantage (in the context of a shortfall of deliverable housing sites) I am clear that I would consider them to favour the grant of planning permission.

⁴³ Evidence of Mr Sedgwick but more particularly the evidence of Mr Harris for Appellant B (paragraphs 7.1 – 7.32)

⁴⁴ CD4 paragraph 3.5

134. In this case, however, the concessions by the Council regarding its supply of deliverable housing sites and the effectively uncontested evidence of the appellant in that regard, both in respect of this appeal and Appeal B, demonstrate not only that paragraph 49 of the Framework is engaged but that the shortfall of deliverable housing sites vis-à-vis the five year requirement is currently severe. The application of the 'tilted balance' of paragraph 14 is therefore central to my overall conclusion on the merits of this case.
135. Paragraph 14 is to the effect, amongst other things, that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole, or specific policies therein indicate that development should be restricted.
136. For all the reasons I have given, I consider there would be no adverse impacts sufficient to do that, especially bearing in mind the severity of the demonstrated shortfall of deliverable housing sites; and there are no specific policies of restriction to be applied in that sense.
137. Having taken all other matters raised into account, I therefore conclude that, on the evidence relevant to both appeals A and B, and on its specific individual merits, this appeal should be allowed.

Keith Manning

Inspector

Annex: Schedule of Conditions

- 1) Details of the appearance, landscaping, layout, and scale (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the following approved plans: Location Plan (dwg. LOCA001); Proposed Site Access (dwg. PB5008/SK003 A).
- 5) The development hereby permitted shall be limited to a maximum of 97 dwellings.
- 6) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:
 - i) the parking of vehicles of site operatives and visitors;

- ii) loading and unloading of plant and materials;
- iii) storage of plant and materials used in constructing the development;
- iv) the erection and maintenance of security hoarding/fencing including decorative displays and facilities for public viewing, where appropriate;
- v) wheel washing facilities;
- vi) measures to control the emission of dust and dirt during construction;
- vii) a scheme for recycling/disposing of waste resulting from construction works;
- viii) delivery and construction working hours.
- ix) Protection of surface and groundwater resources

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

- 7) No development shall take place until a contaminated land assessment, including a site investigation and remediation scheme (if necessary) has been submitted to and approved in writing by the local planning authority. Any remediation scheme so required shall be implemented as approved and, in the event of such a scheme being required, no dwelling hereby approved shall be occupied until a contaminated land closure report has been submitted to and approved in writing by the local planning authority.
- If during any subsequent works contamination is encountered that has not previously been identified, then such contamination shall be fully assessed and a remediation scheme shall be submitted to the local planning authority for approval in writing. Any remediation scheme so required shall be implemented as approved and, in the event of such a scheme being required, any of the dwellings hereby approved that have not already been occupied shall not be occupied until a contaminated land closure report has been submitted to and approved in writing by the local planning authority.
- 8) No development shall take place until the detailed construction designs and a scheme for the construction of the site access and the off-site works of highway improvement has been submitted to and approved by the Local Planning Authority in writing. Thereafter, no dwelling shall be occupied until all the highway works within the adopted highway have been constructed in accordance with the approved construction designs and scheme.
- 9) No development shall take place until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the Local Planning Authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under Section 38 of the Highways Act 1980 or a private management and a maintenance company has been established.

- 10) No development shall take place until a fully detailed scheme for the construction of the "Alternative Guild Wheel Cycle Route" (as indicated on the Illustrative Layout Plan, drawing 1575-801 G) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include a programme for implementation and shall be carried out in accordance with the approved details.
- 11) No dwelling shall be occupied until a Full Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Full Travel Plan shall be implemented within the timescale set out in the approved plan and will be audited and updated at intervals not greater than 12 months for a period of 5 years after the adoption of the Plan to ensure that the approved plan is carried out in accordance with its approved provisions.
- 12) No development shall take place until a detailed scheme for surface water drainage incorporating sustainable urban drainage principles has been submitted to and approved in writing by the local planning authority. The scheme shall include detailed management and maintenance arrangements for the lifetime of the development and shall be implemented in accordance with the approved details.
- 13) No development shall take place until a detailed scheme for foul water drainage has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented in accordance with the approved details.
- 14) No piling or any other foundation designs using penetrative methods shall take place other than with the express written consent of the local planning authority. Any such operation shall only be carried out fully in accordance with the detailed terms of any express consent granted.
- 15) No dwelling shall be occupied until a maintenance and management plan for the public open space within the site (as indicated on the Illustrative Layout Plan, drawing 1575-801 G and/or embodied in any reserved matters approval) has been submitted to and approved in writing by the local planning authority. The maintenance and management plan shall include provisions to ensure that the public open space is maintained and managed to reduce the possibility of pollutants entering groundwater and the risk to public water supply. The public open space shall be managed and maintained in accordance with the approved management plan for the lifetime of the development.
- 16) The development hereby approved shall be carried out in accordance with the recommendations of the Ecological Survey and Assessment by ERAP Ltd (Ref: 2014_208, May 2016), the accompanying Method Statement and the Reasonable Avoidance Measures therein.
- 17) There shall be no works to trees or vegetation clearance works between 1st March and 31st August in any year unless a detailed bird nest survey has been carried out immediately prior to clearance and written confirmation provided that no active bird nests are present, and this has been agreed in writing by the Local Planning Authority.
- 18) Prior to the erection of any external lighting an external 'lighting design strategy' shall be submitted to the local planning authority for approval in writing. The strategy shall identify areas/features on site that are

potentially sensitive to lighting for bats and show how and where the external lighting will be installed (through appropriate lighting contour plans.) All external lighting shall be installed in accordance with agreed specifications and locations set out in the strategy and thereafter maintained in accordance those approved details.

- 19) No development shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority to demonstrate that the development can achieve energy efficiency standards equivalent to Level 4 of the Code for Sustainable Homes. The development shall thereafter be carried out in accordance with the approved scheme.
- 20) Prior to the first occupation of any dwelling, that dwelling shall be provided with an electric vehicle charging point which shall be retained for that purpose thereafter.
- 21) The development hereby approved shall be carried out in accordance with the recommendations of the Tree Survey by Appletons dated 16 February 2016 submitted with the application. No development shall begin until details of the means of protecting trees and hedges within and immediately adjacent to the site, including root structure, from injury or damage prior to development works have been submitted to and approved in writing by the Local Planning Authority. Such protection measures shall be implemented before any works are carried out and retained during building operations and furthermore, no excavation, site works, trenches or channels shall be cut or laid or soil, waste or other materials deposited so as to cause damage or injury to the root structure of the trees or hedges.

* * *

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Alan Evans of Counsel

He called

Michael Molyneux BA MSc BTP MRTPI
Head of Planning Policy

FOR THE APPELLANT:

Ian Ponter of Counsel

He called

Ben Pycroft BA (Hons) Dip TP MRTPI
Associate Director, Emery Planning

Paul Sedgwick DipTP
Principal, Sedgwick Associates

FOR BROUGHTON PARISH COUNCIL:⁴⁵

Patricia A Hastings
BSc RN RM RNT PGDip Ed
(Chairperson)

She called

David R Mills, Parish Councillor
Leslie R Brown, Local Resident
Patricia A Hastings
(in her own capacity as witness)

INTERESTED PERSONS:

Councillor Neil Cartwright
Tim Brown BA MRTPI

Ward Councillor
tb Planning

INQUIRY DOCUMENTS

- ID1 Draft planning obligation (Appeal A)
- ID2 Statement of Common Ground (Appeal A)
- ID3 Opening Statement (Appeal A – Hollins Strategic Land)
- ID4 Opening Statement (Appeal B - Wainhomes)
- ID5 Letter dated 19/12/2014 from Brandon Lewis MP (then Minister of State for Housing and Planning) to PINS
- ID6 Officer report to Joint Advisory Committee on resumed examination of Central Lancashire Core Strategy
- ID7 Central Lancashire Authorities Publication Core Strategy DPD,

⁴⁵ Broughton In Amounderness Parish Council is the full and formal title

- Inspector's Report – May 2012
- ID8 Proof of Evidence of Michael Molyneux BA MSc BTP MRTPI re APP/N2345/W/15/3007033
- ID9 Opening remarks of Preston City Council
- ID10 Opening Statement by Parish Council
- ID11a First draft of suggested conditions (Appeal A)
- ID11b First draft of suggested conditions (Appeal B)
- ID12 Broughton-in-Amounderness Neighbourhood Plan: Landscape visual appraisal of small-scale housing sites (October 2017)
- ID13 Letter dated 07/09/2017 from Ben Wallace MP to Mr Leslie R Brown
- ID14 Internet article on housing development and traffic congestion in North West Preston – Lancashire Evening Post
- ID15 'Blog' regarding operation of new Broughton Bypass
- ID16 Statement of Tim Brown BA MRTPI
- ID17 Statement of Councillor Neil Cartwright
- ID18 Nos. 40 & 41 bus timetable
- ID19 No 4 bus timetable
- ID20a Second draft of suggested conditions (Appeal A)
- ID20b Second draft of suggested conditions (Appeal B)
- ID21 Parish Council's Closing statement
- ID22 Closing statement (Appeal B - Wainhomes)
- ID23 Closing statement (Appeal A – Hollins Strategic Land)
- ID24 Costs application (Appeal A – Hollins Strategic Land)
- ID25 Costs application (Appeal B - Wainhomes)

CORE DOCUMENTS

- CD1. Wainhomes - Committee report 15th June 2017
- CD2. Wainhomes - Minutes of Committee 15th June 2017
- CD3. Wainhomes - Decision Notice
- CD4. Hollins Committee report
- CD5. Hollins Minutes of Committee
- CD6. Hollins Decision Notice
- CD7. Central Lancashire Core Strategy
- CD8. Preston Local Plan
- CD9. Affordable Housing SPD October 2012
- CD10. 2017 Housing Land Position Statement (base date 30th September 2017)
- CD11. 2009 SHMA
- CD12. 2013 Housing Needs and Demand Study
- CD13. 2017 SHMA

- CD14. Draft Broughton Neighbourhood Plan March 2017
- CD15. Submitted Broughton Neighbourhood Plan
- CD16. Examiners Report Broughton Neighbourhood Plan September 2017
- CD17. Broughton Neighbourhood Plan October 2017
- CD18. BNDP representation Emery Planning/Wainhomes
- CD19. BNDP representation Sedgwick Associates/Hollins
- CD20. National Planning Policy Framework
- CD21. Suffolk Coastal District v Hopkins Homes & Richmond Estates Partnership LLP v Cheshire East Borough Council [2016] EWCA Civ 168
- CD22. Suffolk Coastal District v Hopkins Homes & Richmond Estates Partnership LLP v Cheshire East Borough Council [2017] UKSC 37
- CD23. 3167436 Appeal at Garstang Road, Barton, Preston
- CD24. 3160927 Appeal land at Pudding Pie Nook lane, Broughton, Preston
- CD25. 3130341 Appeal Land off Garstang Road, Barton, Preston
- CD26. 3007033 Appeal land at Preston Road, Grimsargh, Preston
- CD27. "Fixing our broken housing market" Housing White Paper February 2017
- CD28. 3173275 Appeal Land at Pear Tree Lane, Euxton, Chorley
- CD29. St Modwen Developments Ltd v East Riding of Yorkshire Council [2016] EWHC 968
- CD30. St Modwen Developments Ltd v East Riding of Yorkshire Council [2017] EWCA Civ 1643
- CD31. Oadby & Wigston Council v Bloor Homes Ltd [2016] EWCA Civ 1040
- CD32. 2200981 & 2213944 Appeal Land to the East and West of Brickyard Lane, Melton Park, East Riding of Yorkshire
- CD33. City & District of St Albans v Hunston Properties Limited [2013] EWCA Civ 1610
- CD34. Preston City Council Cabinet, 19 September 2017, Minute 42

- CD35. "Planning for the right homes in the right places: consultation proposals", DCLG, September 2017
- CD36. 3165490 Appeal Land to the south of Dalton Heights, Seaham, Co Durham
- CD37. Communities and Local Government Select Committee, Oral Evidence, HC 494, 1 November 2017
- CD38. Zurich Assurance v Winchester City Council and South Downs National park Authority [2014] EWHC 758
- CD39. Planning Advisory Service online; pas-topics/local-plans/five-year-land-supply-faq#15
- CD40. 3165930 Appeal land north and east of Mayfields, The Balk, Pocklington, East Riding of Yorkshire
- CD41. Preston Local Plan Inspector's report, June 2015
- CD42. Schedule of volume housebuilder, HCA and strategic land company sites, Preston, October 2017
- CD43. Wainhomes - Planning, Affordable Housing, Heritage and Design and Access Statement
- CD44. Hollins – Planning Statement
- CD45. Wainhomes Landscape and Visual Impact Assessment
- CD46. Wainhomes Layout
- CD47. Memorandum of Understanding Between Preston, South Ribble and Chorley.

APPENDIX 6:

Land off D'Urton Lane - Appeal Decision: Ref. 3296374



Department for Levelling Up,
Housing & Communities

Alban Cassidy
Cassidy + Ashton Group Ltd
7 East Cliff
Preston
PR1 3JE

Our ref: APP/N2345/V/22/3296374
Your ref: 06/2021/0431

30 January 2023

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
APPLICATION MADE BY CASSIDY + ASHTON GROUP LTD
LAND AT D'URTON LANE, PRESTON PR3 5LD
APPLICATION REF: 06/2021/0431**

This decision was made by the Minister of State for Housing and Planning, the Rt Hon Lucy Frazer KC MP, on behalf of the Secretary of State

1. I am directed by the Secretary of State to say that consideration has been given to the report of Darren Hendley BA(Hons) MA MRTPI, who held a public local inquiry on 2-5 and 9-10 August 2022 into your application for planning permission for the construction of a new build mosque, with ancillary features including parking facilities and access works from the existing track off D'Urton Lane, in accordance with application Ref. 06/2021/0431, dated 17 March 2021.
2. On 5 April 2022, the Secretary of State directed, in pursuance of Section 77 of the Town and Country Planning Act 1990, that your client's application be referred to him instead of being dealt with by the local planning authority.

Inspector's recommendation and summary of the decision

3. The Inspector recommended that planning permission be granted, subject to conditions.
4. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions, except where stated, and agrees with his recommendation. He has decided to grant planning permission. A copy of the Inspector's report (IR) is enclosed. All references to paragraph numbers, unless otherwise stated, are to that report.

Matters arising since the close of the inquiry

5. A list of representations received by the Secretary of State since the close of the inquiry is at Annex A. The Secretary of State is satisfied that the issues raised do not affect his decision, and no other new issues were raised in this correspondence to warrant further

investigation or necessitate additional referrals back to parties. Copies of these letters may be obtained on request to the email address at the foot of the first page of this letter.

6. As detailed at IR1-4, the application was submitted to Preston City Council in outline form, with all matters reserved for future consideration apart from access (IR1). Subsequently, scale, layout and appearance also became matters that were for the consideration of the City Council, with landscaping left as the sole reserved matter (IR3). Further information submitted by the applicant included a Design and Access Statement (DAS, November 2021) which contained floor plans for the main mosque building. The Secretary of State has had regard to the schedule of conditions set out at Annex 3 of the IR and, in the interests of certainty, considers that the internal layout plans included in CD17 Design and Access Statement, comprising the Proposed Ground Floor Plan, First Floor Plan, Second Floor Plan and Roof Plan, should form part of condition 4. Following confirmation received from the Inspector on the matter, the Secretary of State considers that this would not be to the disadvantage of any party as the DAS was submitted during the planning application and as such all parties have been thus aware of the DAS, and the proposed floor plans contained within, and it has been subsequently referred to in inquiry evidence. The following has therefore been added to condition 4:
 - Proposed Ground Floor Plan, First Floor Plan, Second Floor Plan and Roof Plan of the Mosque contained within the Design and Access Statement, dated November 2021

Policy and statutory considerations

7. In reaching his decision, the Secretary of State has had regard to section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.
8. In this case the development plan consists of the Central Lancashire Adopted Core Strategy Local Development Framework (2012), the Preston Local Plan 2012-26 Site Allocations & Development Management Policies (2015) and the Broughton Neighbourhood Development Plan (NDP) 2016-2026 (2018), as well as the Joint Lancashire Minerals and Waste Development Framework, Core Strategy DPD (2009) and the Joint Lancashire Minerals and Waste Local Plan, Site Allocation and Development Management Policies – Part One (2013). The Secretary of State considers that relevant development plan policies include those set out at IR17-35.
9. Other material considerations which the Secretary of State has taken into account include the National Planning Policy Framework ('the Framework') and associated planning guidance ('the Guidance'), as well as the National Design Guide (2021) and the documents listed at IR39-40.
10. In accordance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the LBCA Act), the Secretary of State has paid special regard to the desirability of preserving those listed buildings potentially affected by the proposals, or their settings or any features of special architectural or historic interest which they may possess.

Emerging plan

11. The emerging plan comprises the Central Lancashire Joint Local Plan for the local authorities of Preston City Council, South Ribble Borough Council and Chorley Council. Consultation on the 'Preferred Options Part 1' commenced on 19 December 2022 and continues until 24 February 2023.
12. Paragraph 48 of the Framework states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework. The emerging plan has not yet been submitted for independent examination. Given its early stage, the Secretary of State attaches little weight to the emerging plan.

Main issues

Whether the site is previously developed land

13. For the reasons given at IR273-281, the Secretary of State agrees with the Inspector that the site would not meet the definition of previously developed land under the Glossary to the Framework and so would not attract support from Policy 1 of the Core Strategy where it refers to focusing growth and investment on well located brownfield sites (IR281). He further agrees that the site would also not attract support from where the Framework encourages the use of previously developed land (IR281).

The extent to which the proposed development is consistent with the spatial strategy for the area

14. With regards to the spatial strategy, for the reasons given at IR282-293, the Secretary of State agrees with the Inspector that, under the Local Plan Policies Map, the site falls within open countryside (IR285) and lies well outside of the defined settlement limit of Broughton which lies some distance to the north (IR285). He further agrees that Policy 1 of the Core Strategy and EN1 of the Local Plan are central to the spatial strategy of the development and there would be conflict between the proposal and these policies (IR292).

The effect on the significance of designated heritage assets, in particular the Church of St John the Baptist, Broughton C of E Primary School and the Church Cottage Museum

Church of St John the Baptist (Grade II listed building)*

15. For the reasons given at IR294-304, the Secretary of State agrees with the Inspector that there would be some disruption to the setting of the Church (IR298) but that the setting has already been markedly altered by the construction of James Tower Way that dissects the land between the Church and the site (IR298). In relation to visual effects, the Secretary of State agrees that there would be a distinct sense of separation (IR299) and designated views would not be affected (IR300). He agrees for the reasons given that the effect on the significance of the Church would be at the lower end of the scale of less than substantial harm (IR302). He further agrees that, even though the level of harm would be limited, great weight should be attributed to that particular harm (IR304).

Broughton C of E Primary School

16. For the reasons given at IR305-306, the Secretary of State agrees with the Inspector that no harm would arise to the significance of the school (IR306).

Church Cottage Museum

17. For the reasons given at IR307-308, the Secretary of State agrees with the Inspector that no harm would arise to the significance of the museum (IR308).

Other Listed Buildings

18. For the reasons given at IR309-310, the Secretary of State agrees with the Inspector that, with respect to the Sundial, Mounting Block and the Village Stocks (all Grade II listed and lying within the grounds of the Church or adjacent to it), no harm would arise to the significance of these structures (IR310).

Grouping

19. For the reasons given at IR311-314, the Secretary of State agrees with the Inspector, with respect to the grouping of the above listed buildings historically known as the Broughton hamlet, that no harm would arise to the significance of the group of listed buildings from the proposal (IR313).

Conclusion on designated heritage assets

20. For the reasons given at paragraph 15 above as well as IR315-316, the Secretary of State agrees that a degree of harm would arise in relation to the Church of St John the Baptist. However, notwithstanding the great weight which he has attributed to this harm, the Secretary of State does not consider that the limited harm arising to the significance of the Church of St John the Baptist can be described as an 'unacceptable effect' (IR315). Overall he agrees with the Inspector that the proposals would not comply in this regard with Policies 16 and 17 of the Core Strategy and with Policy EN8 of the Local Plan where they afford protection to the historic environment, as regards this asset, as well as with General Policy HE of the NDP (IR315) in relation to the general protection that it applies. The Secretary of State considers there would be no harm to the significance of other designated heritage assets, namely the Broughton C of E Primary School, the Church Cottage Museum, the Sundial, Mounting Block and the Village Stocks, as well as the grouping of listed buildings and agrees with the Inspector that, as regards these assets, the proposal would accord in this regard with Policies 16 and 17, Policy EN8 and General Policy HE of the NDP.

The effect on Highway Safety by way of Traffic Generation, Car Parking and the Guild Wheel Cycling and Walking Route

Traffic generation

21. For the reasons given at IR317-320, the Secretary of State agrees with the Inspector that, whilst no doubt there would be a steady stream of traffic along D'Urton Lane around the times of the Jumah Prayer, it would not cause undue traffic congestion or chaos (IR320), and that D'Urton Lane would ably be able to accommodate the likely traffic generation (IR320). The Secretary of State has also taken into account evidence that was put before the inquiry regarding usage of the mosque at other times, including that there are two Eid festivals in a whole year, but that prayer sessions are spaced out over the

festive day meaning that numbers are diluted and no more than at Jumah Prayer (paragraph 6.131, CD H1 – APC Proof of Evidence), and that during Ramadan there is higher attendance for the other prayers that take place but again the attendance is relatively low when compared to Jumah prayers (paragraph 6.132, CD H1 – APC Proof of Evidence). He has also taken into account that mosque developments' peak traffic generation occurs on a Friday afternoon between 1200-1500 hours (paragraph 5.1.6, CD H4 – Transport Proof of Evidence). He has also taken into account the fact that the presence of on-site parking stewards will not alter the limit of 150 car parking spaces, which is addressed in IR321 and paragraph 22 below. The Secretary of State agrees with the Inspector's conclusion that the transport assessment provides a fair evaluation (IR318).

Car parking

22. For the reasons given at IR321-324, the Secretary of State agrees with the Inspector that the car parking management plan and the travel plan provisions provide a robust package of measures to address car parking (IR325). He further agrees that the site is also well located with regard to cycling; that there is dedicated pedestrian access through and under the M55/A6 roundabout; that the Guild Wheel route is also available for pedestrians; and that the crossing over James Towers Way provides ready access to bus stops to Preston and Broughton village (IR324). He has taken into account that the parking stewards would be looking out for unauthorised parking on D'Urton Lane under the planning obligations, and that in any event it would be the subject of double yellow line restrictions. He agrees that these would also be likely not to be an undue restriction for local residents (IR322).

Guild Wheel Cycling and Walking Route

23. For the reasons given at IR326-331 and IR393-394, the Secretary of State agrees with the Inspector that the proposed segregated pedestrian/cycleway would connect two such sections of the Guild Wheel, so that users would not have to share road space with motorised vehicles (IR393) and that cyclists and pedestrians would have priority because the proposed dedicated pedestrian/cycleway would be raised over the proposed access (IR326). The Secretary of State notes that the Friends of the Guild Wheel consider earlier concerns over safety have been addressed (IR328). He further agrees that the Guild Wheel improvements go beyond simply mitigation for the proposals and therefore goes beyond complying with Policies CF1 and AI2 of the NDP (IR394). The Secretary of State agrees with the Inspector that the improvements to the Guild Wheel attract moderate weight as a benefit (IR394).

Conclusion on traffic generation, car parking and the Guild Wheel Cycling and Walking Route

24. For the reasons given at IR317-331, the Secretary of State agrees with the Inspector that the proposal would not have an unacceptable effect on highway safety by way of traffic generation, car parking and the Guild Wheel cycling and walking route (IR329). He agrees that the proposal would comply with Policies 2 and 3 of the Core Strategy (IR329), Policies ST1 and ST2 of the Local Plan (IR329), and CF1 and AI 2 of the NDP (IR329). He further agrees that the proposal would also accord with the Framework with regard to promoting sustainable transport and that there would not be an unacceptable impact on highway safety (IR330).

The design quality of the proposed development

25. For the reasons given at IR332-342 and IR390-392, the Secretary of State agrees with the Inspector that the site is found in a gateway location and that it is a location that would befit a landmark building (IR333). He agrees that the form of the building and the design of the minaret would satisfy the National Design Guide in respect of creating character and design, with distinctive form (IR334) and further agrees it would be a building of high design quality in terms of its location and appearance which would provide a strong identity for Preston (IR341). He has taken into account that the proposal and also the Inspector's reservations about the local consultation that the applicant carried out (IR339-341 and IR390), but agrees that this does not diminish from the design quality of what is proposed (IR341, IR390), which has been subject to a detailed design review by experienced RIBA Approved Independent Panellists (IR332).
26. In the light of his conclusions at paragraphs 27-29 below, the Secretary of State further agrees with the Inspector at IR391 that the proposal would manage to achieve high design quality without compromising either the character and appearance of the countryside, or of Broughton village. The Secretary of State further agrees with the Inspector at IR392 that in terms of design the proposal would accomplish and exceed the aspirations of development plan policies and that it would meet and surpass this aspect of national planning policy. He agrees that the design quality of the proposal attracts significant weight as a benefit (IR392).

The effect on the character and appearance of the area, including the countryside and Broughton village

The countryside

27. For the reasons given at IR343-348, the Secretary of State agrees with the Inspector that the site has countryside characteristics only in so far as it now has the appearance of undeveloped land (IR343), that the site is best described in character and appearance terms as semi-urban (IR343) and the fact that the site lies in open countryside as shown on the Local Plan Policies map has limited bearing on this consideration (IR344). He agrees that land that can be considered to be truly countryside in character lies some distance from the site (IR346) and these areas display a rural character because they are formed of an open and rolling agricultural landscape, interspersed with farmsteads and isolated buildings (IR346). The Secretary of State agrees with the Inspector that the site performs no role in this regard with the separation involved and the presence of James Towers Way and that the proposal would not have a discernible effect on their countryside character (IR346). He further agrees that the proposal would have an adverse effect in that it would involve a new building in the viewpoint detailed at IR347, but such an effect would be minor as regards the effect on the countryside character and so it would not be unacceptable in relation to its visual impact (IR347). He further agrees that the views from the Guild Wheel and along D'Urton Lane would clearly change, but would not result in a loss of countryside character (IR348).

Broughton village

28. For the reasons given at IR349-353, the Secretary of State agrees with the Inspector that the site does not play a discernible role in the character and appearance of the village, which lies some distance north of the site along Garstang Road, (IR349) and that the proposal would not unacceptably impact on the rural setting of the village (IR350).

Conclusion on the effect on the character and appearance of the area

29. For the reasons given at IR343-357, the Secretary of State agrees with the Inspector that the proposal would not have an unacceptable effect on the character and appearance of the area, including the countryside and Broughton village (IR354) and accordingly would comply in this regard with Policies 17 and 21 of the Core Strategy and Policy EN9 of the Local Plan where they concern the design of new buildings, landscape character, settlement patterns, character, local distinctiveness and the design principles of the Central Lancashire Design Guide Supplementary Planning Document (SPD) (IR354). He further agrees the proposal would comply with Policy NE2 of the NDP where it involves landscape screening and tree planting and Policies CF1 and AI 2 (IR355), the National Design Guide, including where it involves context and identity, and with Section 14 of the Framework where it concerns the overall quality of the area, good architecture, local character and history and landscape setting, amongst other design considerations (IR356).

Need and the benefits of the scheme

Need

30. For the reasons given at IR358-369 and IR387-389, the Secretary of State agrees with the Inspector that on the evidence before the inquiry there is a demonstrable need for the proposal and the need is compelling (IR369). He agrees that the proposal would fulfil the worship requirements of the local Muslim community and be in a location that would be accessible to its likely users (IR387) and that the proposal would allow for the creation of equal and cohesive communities, and increase diversity (IR388). He further agrees that the proposal is supported by Policy 25 of the Core Strategy because it would ensure that local communities have sufficient community facilities provision and attracts support from the Framework as it would allow for a planning decision to plan positively for a place of worship and would strongly support the social objective of sustainable development under the Framework (IR389). The Secretary of State further agrees with the Inspector that the need for the proposal attracts significant weight as a benefit (IR389).

Other Benefits

31. For the reasons given at IR397, the Secretary of State agrees with the Inspector that the economic benefit would arise principally through the construction phase, including related employment and use of businesses (IR397) and that this would support the economic objective of sustainable development under the Framework (IR397). Like the Inspector, the Secretary of State affords the economic benefit moderate weight (IR397).

Other Matters

Drainage

32. For the reasons given at IR371-373, the Secretary of State agrees with the Inspector that, subject to conditions, the proposal would satisfactorily provide foul and surface water management (IR373). He further agrees that, in this regard, the proposals would comply with Policies 29 of the Core Strategy and NE3 of the NDP (IR373).

Energy Efficiency and Renewable Energy

33. In relation to energy efficiency and renewable energy, for the reasons given at IR374-376 and IR395-396, the Secretary of State agrees with the Inspector that energy efficiency

and renewable energy measures are integral to the design of the proposal (IR396) and accord with the requirements of Policy 27 of the Core Strategy (IR376) and would support the environmental objective of sustainable development under the Framework (IR396). The Secretary of State also notes that the proposal has been designed to meet a BREEAM standard of 'very good' (IR375) and that the integral nature of the energy efficiency measures would further evidence that the design quality of the proposed development would be high (IR376). Accordingly, like the Inspector, he attaches moderate weight as a benefit to the energy efficiency and renewable energy measures (IR396).

Non-designated heritage assets

34. In relation to non-designated heritage assets, for the reasons given at IR377-380, the Secretary of State agrees with the Inspector that even though there is not a great deal of distance between the site and the non-designated assets, it does not make any contribution in terms of setting to their significance (IR378). He further agrees that no harm would arise (IR380) and as such there is not a need to carry out a balancing exercise under paragraph 203 of the Framework (IR380). He further agrees that the proposal, in this regard, would comply with Policies 16 and 17 of the Core Strategy, Policy EN8 of the Local Plan and General Policy HE of the NDP (IR379).

Living Conditions

35. With regards to living conditions, for the reasons given at IR381-384, the Secretary of State agrees with the Inspector that in respect of transient noise, there would not be a particular reason for worshippers to congregate outdoors (IR381); that the effect on privacy levels would not be unacceptable (IR383); and that, while the outlook from the nearest properties to the site on D'Urton Lane would change, this would not be unacceptable (IR383). He further agrees that, while there would be likely some traffic noise as vehicles arrive and depart, it is not an environment that is free from vehicular noise (IR382) and there is not substantive evidence that traffic emissions would be unacceptable (IR382). He agrees that the proposed minaret would be unlikely to cause harm with regard to the potential impact on television signals and telecommunications (IR384).

Biodiversity

36. On biodiversity, for the reasons given at IR385, the Secretary of State agrees that the proposal would provide a biodiversity net gain in accordance with the Framework (IR385).

Minerals Safeguarding

37. For the reasons given at IR386, the Secretary of State agrees with the Inspector that there would not be a conflict with minerals safeguarding (IR386).

Planning conditions

38. The Secretary of State has given consideration to the Inspector's analysis at IR250-261, the recommended conditions set out at the end of the IR and the reasons for them, and to national policy in paragraph 56 of the Framework and the relevant Guidance. He is satisfied that the conditions recommended by the Inspector, with the addition referenced at paragraph 6 above, comply with the policy test set out at paragraph 56 of the Framework and that the conditions set out at Annex B should form part of his decision.

Planning obligations

39. Having had regard to the Inspector's analysis at IR262-268 and IR331, the planning obligation dated 16 August 2022, paragraph 57 of the Framework, the Guidance and the Community Infrastructure Levy Regulations 2010, as amended, the Secretary of State agrees with the Inspector's conclusion for the reasons given in IR262-268 and IR331 that the obligation complies with Regulation 122 of the CIL Regulations and the tests at paragraph 57 of the Framework.

Planning balance and overall conclusion

40. For the reasons given above, the Secretary of State considers that the application is not in accordance with Policies 1 of the Core Strategy, and EN1 of the Local Plan with respect to the spatial strategy of the development plan. He further considers that there would be conflict with Policies 16 and 17 of the Core Strategy and with Policy EN8 of the Local Plan where they afford protection to the historic environment, as regards the Church of St John the Baptist, and that there would be conflict with General Policy HE of the NDP in relation to the general protection that it applies. He considers that the proposal is not in accordance with the development plan overall. He has gone on to consider whether there are material considerations which indicate that the proposal should be determined other than in line with the development plan.
41. Weighing in favour is the need for the proposal and the high-quality design which are both afforded significant weight. The Guild Wheel improvements, energy efficiency and renewable energy measures, and economic benefits are each afforded moderate weight.
42. Weighing against the proposal is the 'less than substantial' harm to the Church of St John the Baptist (Grade II* listed), which is afforded great weight.
43. In line with the heritage test at paragraph 202 of the Framework, the Secretary of State has considered whether the identified 'less than substantial' harm to the significance of the Church of St John the Baptist is outweighed by the public benefits of the proposal, as summarised in paragraph 42 above. The Secretary of State has concluded that the harm is outweighed by the public benefits, and that the heritage test is therefore favourable to the proposal.
44. Overall, the Secretary of State considers that despite the conflict with the development plan, the material considerations in this case indicate that permission should be granted.
45. The Secretary of State therefore concludes that planning permission should be granted subject to the conditions set out in Annex B below.

Formal decision

46. Accordingly, for the reasons given above, the Secretary of State agrees with the Inspector's recommendation. He hereby grants planning permission subject to the conditions set out in Annex B of this decision letter for the construction of a new build mosque, with ancillary features including parking facilities and access works from the existing track off D'Urton Lane, in accordance with application Ref. 06/2021/0431, dated 17 March 2021.
47. This letter does not convey any approval or consent which may be required under any enactment, bye-law, order or regulation other than section 57 of the Town and Country Planning Act 1990.

Right to challenge the decision

48. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged. This must be done by making an application to the High Court within 6 weeks from the day after the date of this letter for leave to bring a statutory review under section 288 of the Town and Country Planning Act 1990.
49. An applicant for any consent, agreement or approval required by a condition of this permission for agreement of reserved matters has a statutory right of appeal to the Secretary of State if consent, agreement or approval is refused or granted conditionally or if the Local Planning Authority fail to give notice of their decision within the prescribed period.
50. A copy of this letter has been sent to Preston City Council and Broughton in Amounderness Parish Council, and notification has been sent to others who asked to be informed of the decision.

Yours faithfully

Phil Barber

Decision officer

This decision was made by the Minister of State for Housing and Planning, the Rt Hon Lucy Frazer KC MP, on behalf of the Secretary of State, and signed on her behalf

Annex A Schedule of representations

General representations

Party	Date
Mark Field	15 July 2022
Paul McGuirk	26 July 2022
Gordon Hayward	3 August 2022
Anonymous	4 August 2022
Paul Fisher	4 August 2022
Simon Watson	4 August 2022
Taalib Shamsuddin	4 August 2022
Anonymous	5 August 2022
Gordon Hayward	5 August 2022
James Mercer	5 August 2022
Pat Hastings	5 August 2022
Pat Hastings	5 August 2022
Simon Watson	5 August 2022
Anonymous	6 August 2022
Zuber Isap	6 August 2022
Anonymous	8 August 2022
Firoz Bux	9 August 2022
Paul Fisher	10 August 2022
Peter Black	10 August 2022
Taalib Shamsuddin	10 August 2022
Alban Cassidy, Cassidy+Ashton	18 August 2022
Anwar Essa, Faruk Desai and Mustak Mohammed Patel on behalf of Preston Muslim Society	12 December 2022
Anwar Essa, Faruk Desai and Mustak Mohammed Patel on behalf of Preston Muslim Society	13 December 2022

Annex B List of conditions

1. Details of the landscaping (hereinafter called "the reserved matter") shall be submitted to and approved in writing by the Local Planning Authority before any development takes place and the development shall be carried out as approved.
2. Application for approval of the reserved matter shall be made to the Local Planning Authority not later than 3 years from the date of this permission.
3. The development hereby permitted shall take place not later than 2 years from the date of approval of the reserved matter to be approved.
4. The development hereby permitted shall be carried out in accordance with the following approved plans:
 - L01 – Location Plan
 - 001 Rev C – Proposed Access and Highway Improvements
 - 002 Rev A – Proposed Refuse Vehicle Tracking
 - Proposed Roof Plan dated November 2021
 - Proposed Site Plan dated November 2021
 - Proposed Floor Plans - Service Building dated October 2021
 - Proposed North Elevation – Service Building dated October 2021
 - Proposed South Elevation – Service Building dated October 2021
 - Proposed East and West Elevation – Service Building dated October 2021
 - Proposed Cross Section – Service Building dated October 2021
 - Proposed West Elevation – Mosque dated October 2021
 - Proposed South Elevation – Mosque dated October 2021
 - Proposed East Elevation – Mosque dated October 2021
 - Proposed North Elevation – Mosque dated October 2021
 - Proposed Ground Floor Plan, First Floor Plan, Second Floor Plan and Roof Plan of the Mosque contained within the Design and Access Statement, dated November 2021
5. Any future application for reserved matters shall include a Landscaping and Ecological Enhancement Plan which shall provide for a biodiversity net gain.
6. No development hereby permitted shall commence until a detailed, final foul and surface water sustainable drainage strategy for the site has been submitted to, and approved in writing by, the Local Planning Authority. The detailed sustainable drainage strategy shall be based upon the site-specific indicative sustainable drainage strategy submitted and sustainable drainage principles and requirements set out in the National Planning Policy Framework, Planning Practice Guidance and Defra Technical

Standards for Sustainable Drainage Systems and no surface water shall be allowed to discharge to the public foul sewer(s), directly or indirectly. The details of the drainage strategy to be submitted for approval shall include, as a minimum:

- a) Sustainable drainage calculations for peak flow control and volume control (1 in 1 year, 1 in 30 year and 1 in 100 year + 40% climate change storm events), with a 10% allowance for urban creep;
- b) Final sustainable drainage plans appropriately labelled to include, as a minimum:
 - i. Plan identifying areas contributing to the drainage network, including surface water flows from outside the curtilage as necessary;
 - ii. Sustainable drainage system layout showing all pipe and structure references, dimensions, design levels;
 - iii. Details of all sustainable drainage components, including landscape drawings showing topography and slope gradient as appropriate;
 - iv. Drainage plan showing flood water exceedance routes in accordance with Defra Technical Standards for Sustainable Drainage Systems;
 - v. Finished Floor Levels (FFL) in AOD with adjacent ground levels for all sides of each building and connecting cover levels to confirm minimum 150mm+ difference for FFL;
 - vi. Details of proposals to collect and mitigate surface water runoff from the development boundary; and
 - vii. Measures taken to manage the quality of the surface water runoff to prevent pollution, protect groundwater and surface waters, and deliver suitably clean water to sustainable drainage components;
- c) Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltration rates and groundwater levels in accordance with BRE 365 or Falling Head Permeability Test;
- d) Evidence of an assessment of the existing on-site drainage features to be used, (if any) to confirm that these systems are in sufficient condition and have sufficient capacity to accept surface water runoff generated from the development;
- e) Evidence that a free-flowing outfall can be achieved. If this is not possible, evidence of a surcharged outfall applied to the sustainable drainage calculations will be required; and
- f) Details of the design and specification of the foul water treatment plant or any tertiary treatment plants.

The sustainable drainage strategy shall be implemented prior to first use of the development hereby permitted in accordance with the approved details and thereafter maintained.

7. No development hereby permitted shall commence until a Construction Surface Water Management Plan, detailing how surface water and storm water will be managed on

the site during construction, including demolition and site clearance operations, has been submitted to and approved in writing by the Local Planning Authority. The details of the plan to be submitted for approval shall include for each phase, as a minimum:

- a) Measures taken to ensure surface water flows are retained on-site during construction phase(s), including temporary drainage systems, and, if surface water flows are to be discharged, they are done so at a restricted rate that must not exceed the equivalent greenfield runoff rate from the site; and
- b) Measures taken to prevent siltation and pollutants from the site into any receiving groundwater and/or surface waters, including watercourses, with reference to published guidance.

The Construction Surface Water Management Plan shall be implemented and thereafter managed and maintained as approved for the duration of construction.

8. No development hereby permitted shall commence until:

(a) A plan showing the alignment and elevational treatment of a temporary fence during the construction period for the whole site and a permanent close-boarded fence or similar of not less than two metres in height to be erected along the boundary of the development site where it fronts the motorway or slip road (or at least one metre from any part of the existing motorway fence where the boundary lies within one metre of this) along with a timetable for implementation shall be submitted to and agreed in writing by the Local Planning Authority; and

(b) The fences approved by part (a) of this condition has been erected in accordance with the agreed details.

The temporary fence shall remain in situ for the construction period only. Thereafter, the permanent fence shall remain in situ and only be repaired or replaced in accordance with the requirements of this condition and be thereafter retained.

Details of boundary treatment for the remainder of the site shall be submitted alongside the landscaping details at reserved matters stage.

9. No development hereby permitted shall commence until a detailed construction plan working method statement relating to site development earthworks and drainage alongside the M55 motorway in accordance with the relevant design standards has been submitted to and approved in writing by the Local Planning Authority. The approved detailed construction plan working method statement shall be adhered to throughout the construction period for the development hereby permitted.

10. No development hereby permitted shall commence until a Construction Environmental Management Plan (CEMP) is submitted to and agreed in writing by the Local Planning Authority. The CEMP shall provide for: (i) The means of highway access and parking for construction vehicles, plant and construction workers' vehicles and sustainable travel methods for construction workers, (ii) loading and unloading of plant and materials, (iii) storage of plant and materials used in constructing the development, (iv) storage, disposal and removal of spoil and waste arising out of the construction works, (v) hours of working, (vi) site security arrangements, including hoardings and other means of enclosure, (vii) piling methods, if used, (viii) wheel cleaning facilities, (ix) measures to control the emission of dust and dirt during construction, (x) measures to

control the emission of noise. The approved CEMP shall be adhered to throughout the construction phase of the development.

11. No development shall commence until details of the proposed finished floor levels; ridge and eaves heights of the buildings hereby permitted have been submitted to and approved in writing by the Local Planning Authority. The submitted levels details shall be measured against a fixed datum and shall show the existing and finished ground levels, eaves and ridge heights of surrounding property. The development hereby permitted shall be carried out in accordance with the approved details.
12. Within three months of the commencement of development on site, a BRE Interim Certificate confirming that the development shall achieve a post-construction Building Research Establishment Environmental Assessment Method (BREEAM) rating of at least 'very good' shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details and a BRE Final Code Certificate shall be submitted to and approved in writing by the Local Planning Authority prior to first use of the development hereby permitted.
13. No development hereby permitted shall commence until a scheme for the construction of the site access and the off-site works of highway mitigation has been submitted to, and approved in writing by the Local Planning Authority. The highway works as indicated on drawing 001 Rev C shall include:
 - 3m shared cycle/footway across the full site frontage and up to the junction with the D'Urton Lane (through route);
 - Any other appropriate traffic management necessary for the proposed pedestrian/cycleway;
 - Proposed raised table junction with cycleway priority at the site access and D'Urton Yard; and
 - Proposed double yellow lines - to extended double yellow lines on both sides of carriageway for the full length of the cul-de-sac section of D'Urton Lane.

The approved highway works shall be implemented prior to the first use of the development hereby permitted and thereafter retained.

14. No development hereby permitted shall commence until details of the means of protecting trees and hedges (including root structure within and immediately adjacent to the site) from injury or damage prior to or during the development works have been submitted to and approved in writing by the Local Planning Authority. Such protection measures shall be implemented in accordance with the approved details before any works are carried out, and retained during building operations and furthermore, no excavation, site works, trenches or channels shall be cut or laid or soil, waste or other materials deposited so as to cause damage or injury to the root structure of the trees or hedges.
15. Prior to the first use of the development hereby permitted a site-specific Operation and Maintenance Manual for the lifetime of the development, pertaining to the surface water drainage system and prepared by a suitably competent person, shall be submitted to and approved in writing by the Local Planning Authority. The details of the manual to be submitted for approval shall include, as a minimum:

- a) A timetable for its implementation;
- b) Details of SuDS components and connecting drainage structures and maintenance, operational and access requirement for each component;
- c) Pro-forma to allow the recording of each inspection and maintenance activity, as well as allowing any faults to be recorded and actions taken to rectify issues;
- d) The arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme in perpetuity;
- e) Details of financial management including arrangements for the replacement of major components at the end of the manufacturer's recommended design life;
- f) Details of whom to contact in the event that pollution is seen in the system or if it is not working correctly; and
- g) Means of access for maintenance and easements.

Thereafter the drainage system shall be retained, managed and maintained in accordance with the approved details.

16. Prior to the first use of the development hereby permitted a site-specific verification report, pertaining to the surface water drainage system and prepared by a suitably competent person, shall be submitted to and approved in writing by the Local Planning Authority. The verification report must, as a minimum, demonstrate that the sustainable drainage system has been constructed in accordance with the approved drawing(s) (or detail any minor variations) and is fit for purpose. The report shall contain information and evidence, including photographs, of details and locations (including national grid references) of critical drainage infrastructure (including inlets, outlets and control structures) and full as built drawings. The scheme shall thereafter be maintained in perpetuity.
17. Prior to the first use of the development hereby permitted, specific details of the proposed barrier/gate to the car park shall be submitted to and approved in writing by the Local Planning Authority. Any proposed barrier or gate erected at the access shall be positioned 5m behind the nearside edge of the highway (top of the ramp formed by highway turning head). The gates/barrier shall not open towards the highway. The development hereby permitted shall be carried out in accordance with the approved details prior to first use and thereafter retained.
18. Prior to the first use of the development hereby permitted, at least four parking bays must be marked out for use by electric vehicles only, together with a dedicated free standing weatherproof charger, charging infrastructure and cabling in accordance with details that have been previously submitted to, and approved in writing by, the Local Planning Authority. The electric vehicle charging points shall be retained for that purpose thereafter.
19. Prior to any above ground works commencing on the site, samples of the materials to be used in the construction of the external elevations of the proposed buildings shall be submitted to, and approved in writing by the Local Planning Authority. The development hereby permitted shall thereafter be carried out in accordance with the approved details.

20. Prior to the first use of the development hereby permitted, the car/vehicle parking area (and any associated turning space) shown on the approved plan ref: Proposed Site Plan dated November 2021 shall be completed. The parking (and manoeuvring) area(s) shall thereafter always remain available for parking of vehicles associated with the permitted use. Vehicle parking areas must be properly consolidated and surfaced in bound porous materials, (not loose stone, gravel or grasscrete) and subsequently retained for the lifetime of the development.
21. Prior to the first use of the development hereby permitted, the cycle parking provision shown on the approved plan ref: Proposed Site Plan dated November 2021 shall be completed. The area shall thereafter be kept free of obstruction and available for the parking of cycles only at all times.
22. The development hereby permitted by this planning permission shall be carried out in accordance with the principles set out within sustainable drainage strategy D3490-L-01 produced by PSA Design on 12th March 2021. The measures shall be fully implemented prior to the first use of the development and in accordance with the timing / phasing arrangements embodied within the scheme and thereafter maintained.
23. There shall be no connection between the drainage system of the site and the drainage system of the M55 motorway, nor shall there be any surface water runoff from the site onto the motorway or verge.
24. No external lighting column or other structure associated, other than the approved mosque and minaret itself, with this development hereby permitted shall be erected where any part of the structure is to be situated a distance from the motorway boundary that is less than the height of said structure above ground unless and until details of said structure have been submitted to and approved in writing by the Local Planning Authority in accordance with standard CG300 of the Design Manual for Roads and Bridges.

Details of external lighting (if any) for the remainder of the site shall be submitted alongside the landscaping details at reserved matters stage. Any approved external lighting details shall be implemented in accordance with the approved details and thereafter retained.

25. If during site preparation or development works, contamination is encountered or is suspected in areas where it had not been anticipated, then a scheme for detailed investigation, risk assessment, remediation and verification shall be submitted for the written approval of the Local Planning Authority prior to all but urgent remediation works necessary to secure the area. The remediation scheme shall be carried out in accordance with the approved details.
26. The rating levels of noise arising from the use of any plant or machinery associated with the development hereby permitted shall not exceed 10 decibels (measured in dB(A)) below the background noise level at the nearest noise sensitive premises to the proposed development, as assessed in accordance with British Standard 4142 (2014) (as amended).
27. No external amplified calls to prayer shall be made from the premises, no external speakers shall be installed at the premises and no calls to prayer or religious services shall be audible at any boundary of the site.

28. The premises shall be used for a mosque and for no other purpose (including any other purpose in Class F1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

Report to the Secretary of State

by Darren Hendley BA(Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Date 31 October 2022

TOWN AND COUNTRY PLANNING ACT 1990

PRESTON CITY COUNCIL

Application by

CASSIDY + ASHTON GROUP LTD.

Inquiry held 2-5,9-10 August 2022

Site visits made on 9 August (accompanied) and 11 August (unaccompanied)

Land at D'Urton Lane, Preston PR3 5LD

File Ref: APP/N2345/V/22/3296374

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ABBREVIATIONS LIST

	Acronym
Broughton in Amounderness Parish Council	Parish Council
Broughton Neighbourhood Development Plan 2016-2026 (2018)	NDP
Building Research Establishment's Environmental Assessment Method	BREEAM
Case Management Conference	CMC
Central Lancashire Adopted Core Strategy Local Development Framework (2012)	Core Strategy
Central Lancashire Design Guide Supplementary Planning Document (2012)	SPD
Community Infrastructure Levy Regulations (as amended, 2019)	CIL Regulations
Construction Environmental Management Plan	CEMP
Equality Act 2010	EA
Human Rights Act 1998	HRA
Lancashire County Council	LCC
Local Transport Note 1/20 (July 2020) Cycle Infrastructure Design Metres	Local Transport Note 1/20 m
National Design Guide (2021)	NDG
National Planning Policy Framework (2021)	Framework
Parish Action Plan	PAP
Planning (Listed Buildings and Conservation Areas) Act 1990	LBCA Act
Preston City Council	City Council
Preston Local Plan 2012-26 Site Allocations & Development Management Policies (2015)	Local Plan
Public Sector Equality Duty	PSED
Royal Institute of British Architects	RIBA
Round Table Session	RTS
Statement of Common Ground	SoCG
Section 106 of the Town and Country Planning Act 1990)	S106 Agreement
Updated Preliminary Ecological Assessment	PEA

File Ref: APP/N2345/V/22/3296374

Land at D'Urton Lane, Preston PR3 5LD

- The application was called in for decision by the Secretary of State by a direction, made under section 77 of the Town and Country Planning Act 1990, on 5 April 2022.
- The application is made by Cassidy + Ashton Group Ltd. to Preston City Council.
- The application Ref: 06/2021/0431 is dated 17 March 2021.
- The development proposed is the construction of a new build mosque, with ancillary features including parking facilities and access works from **the existing track off D'Urton Lane**.
- The reason given for making the direction was that in the light of his policy, the Secretary of State has decided to call-in this application.
- On the information available at the time of making the direction, the following were the matters on which the Secretary of State particularly wished to be informed for the purpose of his consideration of the application: The extent to which the proposed development is consistent with the development plan for the area; and any other matters the Inspector considers relevant.

Summary of Recommendation: That planning permission be granted, subject to the conditions in Annex Three

Procedural Matters

1. The planning application was submitted to Preston City Council (City Council) in outline form, with all matters reserved for future consideration apart from access.
2. **The planning application was first reported to the City Council's Planning Committee** on 8 July 2021 with a recommendation of refusal on the grounds of conflict with the spatial strategy of the development plan, highway safety and the effect on the setting of nearby listed buildings. The Planning Committee deferred the determination of the application so that the applicant may bring forward details of the design and layout of the proposed building, further information on parking and evidence of need. The Committee also agreed to undertake a site visit. *(CD E4, E5, E6)*
3. A Royal Institute of British Architects (RIBA) Design Competition for the proposal was ongoing at the time that the planning application was first reported to the Planning Committee. This was completed in September 2021. The applicant then submitted further information to respond to the reasons for deferral. Scale, layout and appearance also became matters that were for the consideration of the City Council, with landscaping left as the sole reserved matter.
4. The planning application was then reported back to the Planning Committee on the 3 February 2022 with a recommendation for approval, subject to a Section 106 obligation concerning car parking and conditions. The Planning Committee resolved to grant planning permission in accordance with the recommendation. *(CD E1, E2, E3)*
5. On 11 March 2022, the Secretary of State issued a Holding Direction that directed the City Council not to grant permission on this application without specific authorisation. This direction was issued to enable him to consider whether he should direct under Section 77 of the Town and Country Planning Act 1990 that the application should be referred to him for determination. *(CD B3)*

6. Subsequently, the application was called in for decision by the Secretary of State by a direction made on 5 April 2022 and it was confirmed that a local Inquiry would be held under the Town and Country Planning (Inquiries Procedure) (England) Rules 2000 (2000 Inquiries Procedure Rules). In the same statement and based on the information available at the time of making the direction, the following were the matters on which the Secretary of State particularly wished to be informed for the purpose of his consideration of the application:

"a) The extent to which the proposed development is consistent with the development plan for the area

b) any other matters the Inspector considers relevant." (CD B4)

7. Broughton in Amounderness Parish Council (Parish Council) applied for and were given Rule 6 status, and subsequently participated in all aspects of the inquiry. The applicant provided an Updated Preliminary Ecological Assessment (PEA) at the same time as the submission of its Statement of Case. On 27 May 2022, the Secretary of State directed under the powers conferred on him by Regulations 14(1) and 7(5) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, that the proposal would not be Environmental Impact Assessment development. The City Council also publicised the application with regard to the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act) and a proposal to carry out works affecting the setting of a listed building, on my request.
8. The applicant and the City Council agreed a Statement of Common Ground (SoCG) which sets out a site and proposal description, planning policy and supplementary planning guidance, planning history and matters of agreement. It states that there are no substantive matters of disagreement. I requested that the applicant and the Parish Council also enter into a SoCG in order to assist the smooth running of the inquiry. However, this was not forthcoming and it was evident at the inquiry that there was limited common ground between these parties. Similarly, interested parties represented markedly differing views on the proposal. (CD B15)
9. The inquiry opened on 2 August 2022 and closed on 10 August 2022, after a total of 6 sitting days. Aside from the applicant, the City Council and the Parish Council, a number of members of the public addressed the inquiry. The inquiry proceeded on a hybrid basis, due to Covid-19 impacting on a number of the participants. I am satisfied that no party was put at any disadvantage by the inquiry proceeding in this way. An accompanied site visit was undertaken and after the inquiry had closed I undertook an unaccompanied site visit. This was based on an itinerary that the Parish Council had prepared, as well as viewpoints and panoramas that had also been submitted. (CD H8, H12, J7, J13)
10. A draft Agreement under Section 106 of the Town and Country Planning Act 1990 was submitted prior to the opening of the Inquiry. A short period of time was allowed after the inquiry closed for a final executed version to be submitted. It was duly received (S106 Agreement). (CD B14, ID 32)

The Site and Surroundings

11. The application site comprises an area of land that is located at the western end of **D'Urton Lane**. It is not currently in use, but was formerly the construction

compound for the nearby A6 Broughton Bypass, which is also known as James Towers Way and takes the form of a dual carriageway nearest the site. There is a **gated tarmac access onto D'Urton Lane, from which a track rises to** an area of loose stone that is located centrally on the site. Much of the site is now given over to ruderal vegetation and there are mature trees on the boundaries with **D'Urton Lane** and the east boundary. There are also some trees along the south boundary, including a prominent row of conifers. The site is in an elevated **position compared to D'Urton Lane**, where there is a stone retaining wall. It is also embanked towards the A6 and is higher than the M55 Junction 1 roundabout which is found immediately to the south-west.

12. **D'Urton Lane consists of occasional residential** development that is interspersed with open land, together with a complex of former farm buildings. Some of the buildings are non-designated heritage assets. **D'Urton Lane** forms a dead end nearest James Towers Way but allows access for the Guild Wheel route, which is used by both cyclists and recreational walkers. The Guild Wheel relies on the use of the **carriageway for much of D'Urton Lane**. Immediately beyond **D'Urton Lane**, the area is dominated by the highways infrastructure associated with the M55 and James Towers Way. There is also a car park on the north side of James Towers Way.
13. Beyond this car park, there is the Blundell Brook and then a small clustering of listed buildings, including the Church of St John the Baptist. This cluster is known locally as Broughton in Amounderness hamlet. The main built form of the village is some distance away from the site and accessed along Garstang Road (the old A6). **Apart from the 'hamlet', there is open land and occasional** development in between. The Guild Wheel, after traversing James Towers Way via a signalised crossing runs up the side of Garstang Road via a dedicated cycleway. Along James Towers Way, there is some associated landscaping and as it moves further away from the site beyond a further roundabout, it passes between a number of agricultural fields.
14. To the south of the M55 is a hotel and a public house, beyond which there is more highways infrastructure which serves principally new residential development that is taking place in north west Preston. Along Garstang Road to the south of the M55, there are more established residential areas and associated uses, including a cricket club.

Planning Policy

15. The development plan for the area consists of the Central Lancashire Adopted Core Strategy Local Development Framework (2012) (Core Strategy), the Preston Local Plan 2012-26 Site Allocations & Development Management Policies (2015) (Local Plan) and the Broughton Neighbourhood Development Plan 2016-2026 (2018) (NDP), as well as the Joint Lancashire Minerals and Waste Development Framework, Core Strategy DPD (2009) and the Joint Lancashire Minerals and Waste Local Plan, Site Allocation and Development Management Policies – Part One (2013). (*CD A1, CD A4, CD A6, ID 14, ID 15*)
16. There are a large number of relevant policies that have been set out in the submissions and whilst these have all been taken into account, I set out below those that are most pertinent to the proposal.

Core Strategy

17. The Spatial Vision of the Core Strategy raises matters in relation to sustainable economic growth, transport and connections, the role of its main settlements, character, neighbourhoods and residents, and climate change. It also includes 24 Strategic Objectives which set out the key issues to be addressed in each policy area. They underpin and are reflected in the policies in the Core Strategy.
18. Policy 1 concerns the spatial strategy for the plan area by way of the location of growth. The policy supports a hierarchical approach based on the main urban areas. It seeks to focus growth and investment on well located brownfield sites and the Strategic Location of Central Preston, the Key Service Centres of Chorley and Leyland and the other main urban areas in South Ribble, whilst protecting the character of suburban and rural areas. It also provides for some greenfield development on the fringes of the main urban areas. Under (f), in other places - smaller villages, substantially built up frontages and Major Developed Sites - development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional reasons for larger scale redevelopment schemes.
19. Policy 2 deals with infrastructure including the service requirements that will arise from or be made worse by development proposals, and in particular how such infrastructure is to be funded. Policy 3 concerns travel including improving pedestrian facilities; opportunities for cycling; encouraging car sharing; managing car use; and Broughton bypass, amidst other measures. Policy 13 relates to the rural economy and states that proposals will be required to show good siting and design in order to conserve and where possible enhance the character and quality of the landscape. Development should also be of an appropriate scale and be located where the environment and infrastructure can accommodate the impacts of expansion.
20. Policy 16 concerns heritage assets and protects and seeks opportunities to enhance the historic environment, heritage assets and their settings by, amongst other considerations, safeguarding heritage assets from inappropriate development that would cause harm to their significance. Policy 17 states that the design of new buildings will be expected to take account of the character and appearance of the local area. It sets out a number of criteria including siting, layout, massing, scale, design, materials, building to plot ratio and landscaping; safeguarding and enhancing the built and historic environment; being sympathetic to surrounding land uses and occupiers, and avoiding demonstrable harm to the amenities of the local area; and climate change matters. Policy 19 involves itself with providing for areas of separation, including around Broughton.
21. Policy 21 concerns landscape character areas and requires development to be well integrated into existing settlement patterns, appropriate to the landscape character type, amidst other matters. Policy 25 seeks to ensure that local communities have sufficient community facilities provision, including with regard to working with public, private and voluntary sector providers to meet demonstrable need; and encouraging and coordinating new provision at locations that are accessible by all modes of transport. The supporting text to Policy 25 refers to places of worship in this regard.
22. Policy 27 seeks sustainable resources in new development through a number of measures. These include minimum energy efficiency standards for all other new

buildings that will be 'Very Good' (or where possible, in urban areas, 'Excellent') according to the Building Research Establishment's Environmental Assessment Method (BREEAM).

23. Policy 29 relates to water management. It is of relevance to surface and foul water and concerns reducing the risk of flooding, managing the capacity and timing of development to avoid exceeding sewer infrastructure capacity and sustainable drainage systems, amongst other factors.

Local Plan

24. Policy IN2 provides and safeguards land for the Broughton bypass, as well as **the D'Urton Lane/Eastway Link Road**. Policy AD1 (a) permits development within (or in close proximity to) the Existing Residential Area. This is subject to design, residential amenity, not leading to an over concentration of non-residential uses and over intensification. The Existing Residential Area is identified on the Policies Map. (CD A2, CD A3)
25. Policy ST1 concerns the City **Council's parking standards** which are set out in Appendix B. For places of worship, car parking is expressed as space per gross floor area. For the location of the site, this is 1 space per 5 square metres. Standards are also expressed for disabled parking, and bicycle and motorbike spaces. The policy states that locations that are accessible to services and well served by public transport may be considered appropriate for lower levels of provision. Policy ST2 covers road safety and efficient and convenient movement for all highway users; appropriate provision for public transport and measures to facilitate access on cycle and foot, protection and extension of existing pedestrian, cycle and equestrian routes, and the needs of disabled people, as well as future transport routes.
26. Policy EN1 relates to development in the Open Countryside, as is shown on the Policies Map. Other than under policies HS4 and HS5, such development will be limited to that for agriculture, forestry or other uses appropriate for a rural area; re-use or re-habitation of existing buildings; infilling within groups of buildings in smaller rural settlements.
27. Policy EN4 states that the Areas of Separation shown on the Policies Map are designated between Broughton and the Preston Urban Area. The policy goes on to state that development will be assessed in terms of its impact upon the Areas of Separation including any harm to the effectiveness of the gap between settlements and, in particular, the degree to which the development proposed would compromise the function of the Areas of Separation in protecting the identity and distinctiveness of settlements.
28. Policy EN8 states that proposals affecting a heritage asset or its setting will be permitted where, as is of relevance in this case, they accord with national policy on the historic environment and the relevant Historic England guidance, make a positive contribution to the character and local distinctiveness through high quality new design that responds to its context; are accompanied by a satisfactory Heritage Statement; and sustain, conserve and, where appropriate, enhance the significance, appearance, character and setting of the heritage asset itself and the surrounding historic environment and where they have considered the scale, layout, and appearance to the heritage asset and its setting.

29. Policy EN9 states that proposals should be designed with regard to the principles that are set out and explained in the Central Lancashire Design Guide SPD, and that applications will be approved where they accord with its principles and guidance set, the relevant policies in the Core Strategy, national policy on the historic environment and Design Council Cabe guidance; make a positive contribution to the character and local distinctiveness of the area through high quality new design that responds to its context; and are accompanied by a satisfactory Design and Access Statement.

NDP

30. The NDP contains objectives which include, amongst others, the rural setting, development, environment and heritage and open countryside. The NDP also provides an extract from the Local Plan Policies Map which identifies the settlement boundary for Broughton.
31. Policy NE1 concerns local green spaces, which are designated as Glebe Field between the Parish Church of St John Baptist and the Vicarage, and land between Blundell Brook and Broughton Bypass. In these areas there is a presumption against any development which is not ancillary to the use of these spaces and reduces their character or openness. Only when very special circumstances can be demonstrated will development be allowed.
32. Policy NE2 states that the visual impact of new development particularly that on the edge of the defined settlement of Broughton when viewed from approaching routes should be minimised by landscape screening and tree planting. Policy NE3 sets out that sustainable drainage schemes shall be used to drain land wherever possible for development.
33. Policy CF1 states that development which impacts on the Guild Wheel, public footpaths and bridleways shall not have a detrimental impact on the safety of users or the landscape setting of these routes. Proposals which improve these facilities and benefit users will be supported in principle.
34. General Policy HE sets out that the heritage assets identified in the Heritage Register for the plan and any subsequent reviews shall be protected in accordance with policies EN8 and EN9 in the Local Plan and national guidance. A figure associated with this policy identifies a number of views which the policy considers to have significance in terms of the historic setting of the village. The policy goes on to explain that proposals will be considered in relation to the need to protect these historic settings and will be resisted where it results in a significant detrimental impact.
35. Policy AI 2 provides for the Guild Wheel enhancement. It states that proposals to further enhance the popularity of this facility and to establish Broughton Village as a refreshment stop on this heavily used cyclist/pedestrian route will be supported. Proposals that would be to the detriment of the safety, amenity and enjoyment of users potentially reducing the numbers using this facility will not be permitted.

National Policy

36. The National Planning Policy Framework (2021) (the Framework) sets out **the Government's planning policies for England and how these should be applied**. Those chapters which are of particular relevance in this case are 2. Achieving

Sustainable Development, 4. Decision-making, 6. Building a strong, competitive economy, 8. Promoting healthy and safe communities, 9. Promoting sustainable transport, 11. Making effective use of land, 12. Achieving well designed places, 14. Meeting the challenge of climate change, flooding and coastal change, and 16 Conserving and enhancing the historic environment. The definitions set out in the Glossary concerning previously developed land and the setting of a heritage asset also have a specific bearing to the proposal.

37. The National Design Guide (2021) (NDG) provides planning guidance for beautiful, enduring and successful places. It sets out how such places can be achieved in practice and includes ten characteristics. Amongst these are context, identity, built form, movement, mix and resources. *(ID 17)*
38. The main parties accept that the proposal will affect the setting of at least one listed building. Accordingly, Section 66(1) of the LBCA Act is engaged. This requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. *(ID 31 Appendix A, paragraph 129)*

Local Guidance

39. The Central Lancashire Design Guide Supplementary Planning Document (2012) (SPD) provides an overview of what in design terms that the Central Lancashire authorities will employ when considering planning proposals. Of particular relevance is the guidance that it employs over design principles and design review. *(CD A5)*
40. The Local Heritage List for the rural areas of Preston includes buildings, structures and areas of some historical and architectural interest that contributes to the character of an area and is valued by local people. It includes a number of **properties along D'Urton Lane**. *(ID 8)*

Planning History

41. The planning history of the site relates to its function as the associated temporary construction compound and storage area for James Towers Way. This was approved by Lancashire County Council (LCC) in 2013 under planning reference 06/13/0528, which itself was a renewal of an earlier permission. The bypass itself has been the subject of numerous permissions, as well as Orders made by the Secretary of State for the Department of Transport, including under the Highways Act 1980 and the Acquisition of Land Act 1981. *(CD H2 Appendices APC8 to APC15, H9)*
42. A further planning permission by way of a variation of condition was subsequently granted by LCC under planning reference LCC/2019/0006 to the 2013 permission, as well as to a permission under planning reference LCC/2014/0112, that included a turning head from the temporary access to the compound area into the wider scheme. The approved works for James Towers Way include landscape enhancement and mitigation. *(CD H2 Appendix APC16, ID 16)*

The Proposal

43. The proposal is described on the planning application form as "*the construction of a new build mosque, with ancillary features including parking facilities and access works from the existing track off D'Urton Lane.*" (CD C1)
44. The proposal is shown on the submitted plans and there are also a number of indicative 3 dimensional views. (CD C2 to C12)¹
45. The proposed building would be located in the south-west corner of the site. It would be an oval shaped building that would rise to a height of 12 metres (m) and include a minaret that would be of a height of 30m. The construction would be of curved precast concrete panels that would be clad in brickwork, with triangular glazing features. Internally, the ground floor would accommodate the entrance and lobby areas, a prayer room and ablution room. On the first floor there would be a multi-purpose hall, adult Quran classroom, Mihrab, female ablution room, kitchen and crèche. A relaxation room, meeting room, Islamic library and a gallery would be found on the second floor.
46. Externally, there would be a courtyard area. There would be a car park of 150 spaces **to serve the proposal that would be accessed off D'Urton Lane.** This is at the same point as the current access to the site. There would also be cycle parking adjacent to the building and a service building located along the northern boundary of the site. A separate pedestrian access would be formed from the north-west corner of the site, near to James Towers Way. A segregated pedestrian/cycleway is also proposed along the site frontage from the western end of **D'Urton Lane** towards its eastern end and would include raised table junctions with cycleway priority over the access into the site and that of neighbouring housing.
47. The principal use of the proposal would be just after lunchtimes on Fridays for Jumah Prayer, the equivalent of Sunday mornings for Christians. This would involve 2 prayer sessions and last around 20 minutes each. They would take place one after the other with a short gap in between to allow worshippers to depart and arrive. On arrival, worshippers would enter the ablution area and then the prayer room. After the Jumah Prayer, worshippers would then leave the building. At other times, attendance for worship would be considerably less. The proposed minaret would be an architectural feature and would not be used for call for prayers. (CD H1 4.33 to 4.38)

The Case for the Applicant: Cassidy + Ashton Group Ltd

48. The applicant's **case is fully set out in its evidence, and in its opening and closing submissions** which were delivered orally and are in the electronic documents. The main points are set out below. (CD G7, ID 21, ID 31)

Introduction

49. The inquiry concerns a community facility comprised of a place of worship proposed to be situated on despoiled left-over land isolated between the M55 and a recently constructed dual carriageway, James Towers Way. The bypass was

¹ The applicant informed at the inquiry that CD C3 and C4 are the same.

constructed by LCC including because the Parish of Broughton, strongly desired to re-route traffic previously travelling through that village away from, and around, the village and to the south of the listed church rather than to its west.

50. The construction of the bypass, quite recently authorised by the Secretary of State for Transport (taking account of the historic and natural environment) in the public interest, fundamentally changed the particular nature of the area to the north and south of the bypass. An area of previously developed land, which now comprises the application site, has been left in its present isolated situation as a result of construction-related use.. *(CD H9, ID 19, ID 26)*
51. In that fundamentally changed actual context, and in the context, also, of the Framework, which states that good design is indivisible from good planning, an international competition for a place of worship was held to meet an accepted need by local worshippers. This was judged by an independent expert panel, including by experienced RIBA architect designers, to be a proposal for a place of **worship of "exceptional" quality, raising standards of design over a wide area.** Also following proper evaluation of the proposal and wide public consultation, the Local Planning Authority properly resolved to grant planning permission for the place of worship.
52. The proposal aligns with national policy, that of the local authority, and that of **the neighbourhood forum, as well as relevant listed buildings' legislation.** Planning conditions have been agreed to secure its design quality, infrastructure improvements to the Guild Wheel, a planning obligation and travel plan. The proposal aligns with the development plan, taken as a whole. In particular, the development of a place of worship in this particular isolated location would be consistent with the NDP as well as being supported in the public interest by national policy for places of worship in a multi-faith nation. The development also satisfies paragraph 202 of the Framework.
53. Consequently, the requirement of section 66(1) of the LBCA Act is satisfied and so too are the associated policy provisions. On a proper balance, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the Local Planning **Authority's resolution** would properly result in a conditional grant of planning permission for this exceptional place of worship in the proper public interest. *(ID 31 Appendix A pages 26 and 28)*
54. The **applicant's** evidence supports the grant of conditional planning permission in this application because the proposal accords with the development plan (taken as a whole), and is reinforced by material considerations. Such a conclusion can be properly drawn where either the proposal complies with all policies or some pull in different directions. In the event that there is disagreement with this conclusion as not complying with the development plan permission falls to be granted because material considerations indicate and show so and the proposal gains support from a number of development plan policies. *(CD H1 to H13, K1 to K4)*
55. The proposal would be a simply brilliant place of worship in the form of a mosque for a great City. Bold yet subtle, that would result in social inclusion and cohesion. That is sustainable development at its very best: economic, social, and environmental intertwined for the future. The inquiry forum itself has been an effective and proactive process by which to ensure active social inclusion and cohesion by all, with all, of the whole community.

Submissions

56. The proposal complies with the development plan taken as a whole and is supported further by the relevant provisions of the Framework. Development plan policies may pull in different directions and notwithstanding this, a proposal may nevertheless comply with the plan taken as a whole. It is now clear that the proposal satisfies plan policies that expressly support and require planning permission to be granted, whereas no applicable policy expressly prohibits planning permission being granted. The Framework also encourages and adds significant weight to a range of considerations in favour of the proposal. Reliance is also placed **on the Officer's Report** that evaluates the proposal as not complying with the plan but instead being strongly supported by the Framework and plan policies to arrive at the same conclusion: a conditional grant of planning permission. *(CD E1 section 3.8)*
57. The proposal would result in limited harm to the setting of the Church, that bears moderate weight against it, and that weight falls to be weighed against the public benefits. There are no residual safety issues in relation to transportation matters. Rather, the proposal would improve safety by ensuring segregation of **cycle traffic along D'Urton Lane from other vehicle traffic by means of a dedicated footway and cycle way**. That is a public benefit. It ensures at its entrance that a raised table and priority signage so that cycle and user safety can be maintained.
58. The proposal is an extraordinarily high-quality piece of architecture that is **without doubt locally distinct, being "bold yet subtle", and an icon for this strategic gateway**, raising design standards regionally if not also nationally. This is a public interest benefit. The site is an urbanised piece of left over and despoiled highway construction land. It is devoid of landscape character, of a previously developed nature and has not blended into the landscape. It is not the subject of restoration under development management procedures. The proposal would bring that land back into active and productive use. There is a demonstrable need. This is a public benefit. Overall, public and other benefits outweigh the identified harm.

The Application Site and its Nature

59. The site comprises land remaining from the recent and necessary construction of the bypass that had been much sought after by the Parish Council *(CD C27, Aerial Photographs 2001, 2007, and 2013 on pages 11, 10 and 9)*
60. That need arose from a combination of traffic congestion in the defined settlement of Broughton Village and air quality impacts along Garstang Road (Policy IN2 of the Local Plan). *(CD A1 page 29, CD A6 page 43 paragraph 10.4.1-2 & page 77 paragraphs 12.1.1-5)*
61. The A6 bisects the M55 on the strategic road network on the north side of Preston, which forms a northern gateway to the city. It is an actual gateway because the M55 is raised at that location. The construction of the new bypass resulted in a dual carriageway sweeping north from that gateway in a classic bypass configuration. Air quality improvements along Garstang Road have resulted and there is a significantly reduced volume of traffic along this road. Thus, the defined settlement of Broughton at the northmost end of Garstang Road is a lot quieter today.

62. The result of the foregoing physical change is to have left the site sandwiched between the raised M55, the M55/A6 roundabout and the dual carriageway. Between the dual carriageway and the **site lies D'Urton Lane**, a cul-de-sac. **That road itself is also changed, being a 1960's** highway that straightened out the previous winding lane. The road follows the existing contours and descends gently downwards to the end of the cul-de-sac where the road stops and its footway element crosses the new bypass at a crossing that allows non-vehicle traffic to then reach the Garstang Road.
63. A renowned circular route around Preston known as the Guild Wheel also runs along these two roads. Up to the **eastern end of D'Urton Lane**, the Guild Wheel remains a shared cycle/pedestrian route segregated from the carriageway vehicular traffic. Along Garstang Road, it ceases to be segregated from vehicular traffic as it reaches the bypass. **Thus, along D'Urton Lane**, it is not currently differentiated and so cycle traffic must adhere to the highway whereas pedestrians have a single narrow footpath along one side of that road.
64. The bypass construction left little of the pre-existing situation of the site or its locality. All that remains immediately adjacent the site are three large trees on the south side **of D'Urton Lane and a retaining wall that runs along the highway** boundary for a short length.

Demonstrable Need

65. This remains a community facility and not a commercial development. There is a qualifying demonstrable need for the proposal and no requirement in policy or law to first show the absence of alternatives.
66. Policy 25 of the Core Strategy requires there to be a demonstrable need for a community facility. The application includes the existing and potential further need for a new place of worship as a result of the identified and the potential households. The site location is close to that need as evidenced by the plan showing the disposition of the worshippers who would use the proposed place of worship. *(CD C30, C31, H2 Appendix 18)*
67. Interested parties gave evidence on the need to express their faith in the proposed place of worship, as well as what a mosque means. Ultimately, a mosque is a facility for the community. It is also a basis for social cohesion, cultural wellbeing and inclusion, and so would satisfy paragraphs 8(b), 92 and 93; and 130(f) of the Framework. Unlike other places of worship, the genesis of a mosque derives from the location of the worshippers and not the other way around. As the local demographic has evolved, it has revealed a latent (now patent) need for a mosque in North Preston. Clearly, Policy 25 of the Core Strategy is satisfied. *(CD A4 page 121)*
68. There is a geographical area of demonstrable need. There is no policy requirement in the development plan nor in the Framework to show that there are no alternative sites for a community facility. If anything, paragraphs 84(d) and 85 of the Framework encourages their development rather than asserting a need to show alternatives and impeding the development of land for such facilities. *(CD H2 Appendix 18)*
69. The NDP evidences the need for a multi-use community building for local groups and the proposal would be open to all, subject as with all forms of places of

worship to cultural matters alone. There is a Scout Group that would like to use the proposal. (CD A6 Paragraph 10.1.5, bullet point 3)

70. The site is well-related to public transport comprised of buses regularly traveling along Garstang Road to and from Preston City centre. A map of the walking and catchment area has been provided. A Technical Note shows the number of cyclists using the Guild Wheel. The site is also ideally located for access to the North Lancashire motorway network, being close to a principal road. The City Council Officer Report has evaluated the site as having good accessibility by public transport. The site lies on the Guild Wheel route and so is immediately accessible on foot and cycle. (CD A6 page 76 paragraph 12.1.7 & 12.1.1, C24 Table 2, C32, E1 page 46)
71. Policy 25(a) and (b) are satisfied. There is no evidence that another community facility in the form of a mosque would be lost as a result of the proposal. Policy 25(d) is not relevant. It follows that Policy 25 requires the decision maker to provide the community facility where there is a demonstrable need through looking favourably on the planning application. There is no evidence of any other available community facility proximate to its engendering worshipping community to meet that demonstrable need other than the site. That is not a question of alternatives. The core point is the mosque location derives from and follows the population demographic location. (CD A4 page 121)

The Previously Developed Nature of the Site

72. LCC had available after the conclusion of the construction of its bypass left-over land next to the M55 and A6 interaction. This land was acquired for the proposal to meet the demonstrable need. Policy 25 requires that need be met. The site qualifies within the definition of previously developed land in Annex 2 of the Framework. (CD A4 Page 121)
73. Before 1992 the appeal site was in some kind of agricultural use, together with a cluster of buildings, situated in the location of the existing crossing. In 1992, LCC acquired the land and records its use as 3 dwellings with land subject to a grazing licence. The site was not from 1992 in agricultural use but was by then developed for residential use and development within the Town and Country Planning Act 1990. This is not, therefore, an undeveloped site. Nor is the site undeveloped from built development. The Google Map aerial views of the site clearly show the presence of buildings and evidence of the then lawful land use. (ID19 Aerial View Photographs)
74. By 2017, similar maps show the fundamental change as a result of the bypass construction. The site was land formed by its re-profiling with rock aggregate to form a construction compound for the bypass construction, along with an associated access. That development was permitted development. Google Map images show the presence of tarmac fixed surface infrastructure laid out as a car park atop ground strengthening aggregate as well as storage containers, and a **sweeping accessway from D'Urton Lane up to that largely flat platform**. Detailed contour plans from LCC show the shape of the fill before the actual land formation of the site, and the presence of now-infilled voids. The Secretary of **State's decision and Inspector's Report** into the bypass describe the pre-existing situation and the effects from the delivery of the dual carriageway. The core resulting effect was to fundamentally change the actual physical environment of

the gateway and urbanize the locality of the site. (*CD C27 page 8, K1 page 29; Appendix 4, H9*)

75. Thus, it remains important to recall that the very nature of the site is artificial and itself derives from the fundamental change considered as necessary as the price for a quieter Garstang Road, of better air quality along that road, and of a de-congested and quiet defined Broughton settlement.
76. The bypass has been completed and its required environmental mitigation in the form of a treed corridor remains partly carried out but to be completed in accordance with the plans. The approved plans clearly do not cover the appeal site, apart from two slim curved areas either side of the sloped site access. (*ID16*)
77. There is no evidence that the restoration of the site was required by any planning permission nor that, aside from compulsory purchase plans, the land use permitted by the permitted development regime was temporary. Rather, like a multitude of former brownfield sites, the site appears to have had the tarmac grubbed up and a scattering of soil applied to it possibly with some seeds. A walk over immediately reveals the nature of the underlying aggregate and the uneven nature of the actual ground. Over that ground, the site has a superficial growth of weed species.
78. The site is self-evidently previously developed land, has no countryside characteristics, remains unmanaged and has no actual land use. It is degraded and despoiled, does not display any landscape characteristics, and does not have any linkages. It is a leftover and despoiled piece of land and is fundamentally a construction storage platform.
79. This evidence shows that the site properly satisfies the Framework definition of previously developed land. It cannot be excluded from that definition because the land fill of the site by highway aggregate was not accompanied by development management procedures (apart from the two slim curves along part of the access) for the whole of the site. It cannot be properly said to have blended into the landscape. Whilst superficially green coloured, it remains brownfield in common with numerous brownfield sites in England that have become overgrown.
80. The local highway authority has evaluated the site as having good accessibility to public transport provision within desirable walking distances. It is fortunate to be located within 400m of bus routes on the A6 Garstang Road. The NDP also picks up on the bus stops. Paragraph 85 of the Framework requires that the use of previously developed land should be encouraged where suitable opportunities exist. The application has resulted in such a suitable opportunity in the right location. Similarly, in line with paragraph 85, the site is also well-related physically to the existing settlement of Preston and further satisfies that paragraph for that reason also. (*CD A6, D26 page 3*)
81. Policy 25 of the Core Strategy requires the demonstrable need to be met and, in this case, the site provides to meet that locational need. Objection to the location of the site for a place of worship runs counter to the Framework and Policy 25. Similarly, paragraph 84(d) of the Framework requires the community facility location to be recognized because the site is accessible in supporting a

prosperous rural economy. Overall, the site is the right location for the proposed development. (CD A4 page 121, E1 page 45)

The Proposed Development & Design

82. A place of worship is a type of community facility referred to in paragraph 84(d) and with regard to paragraph 85 of the Framework, as community needs. But, by contrast with those paragraphs, such a facility is not expressed as a shop, a venue, a building or a pub, but as a place. It is not merely a building but is a place that includes hard and soft landscaping in which is set a form of a mosque itself constituted by an elliptical drum with a slender tower on its south-west side nearest to the gateway of north Preston. (CD C2 to C11)
83. The Officer Report evaluates the building of the highest design quality at this strategic gateway to the city to create a landmark building, and that it would create a strong, bold and iconic structure. The proposal resulted from an international competition that attracted some 300 expressions of interest, 213 entries and 5 shortlisted entries. The five that made Phase II were subject to an evaluation that aligned with the detailed examination envisaged by the local design review but, appropriately for the identification of an exceptionally high quality design, was not confined to mere parochial evaluation. The wider competition evaluation remains appropriate because the site is simultaneously a strategic gateway location for Preston, at the intersection of the A6 and the M55 and adjacent to the bypass. The proposal must thus respond to a variety of scales including national as well as regional, City-wide, and immediately parochial. (CD C17, E1 pages 40-41, H5 sections 04 and 05)
84. This aligns with Table 1, Design Principle 6: Architecture and Townscape of the SPD, that "*Development should be visually attractive as a result of good architecture and appropriate landscaping*". Column 4 states that "*New development should enrich the qualities of existing urban places. This means encouraging a distinctive response that arises from and complements its setting. This applies at every scale: the region; the city; the town; the neighbourhood; and the street*". The SPD reinforces that Principle 6 is concerned with a "*development that responds positively to its surroundings through its external appearance and form*". (CD A5 Table 1 page 28, page 27)
85. **Table 1 also refers to "Character: a place with its own identity". "Surroundings" is not confined to the north point of the Parish compass but encompasses all points, including the highway infrastructure and Preston. "A place" is not confined to a notional narrowly confined 'cone of place' extending north from the site exclusively to the nearby Church. That approach is directly contrary to the NDG and to Principle 6 of the SPD that require a wider (and rounder) evaluation of "place" to be undertaken.** (CD A5 Table 1 page 28, ID 17)
86. Neither Design Principle 6 or Table 1 is artificially so confined that local relates only to the immediate and north facing notional corridor beyond the site, and not to exclude the wider local surroundings of the highway infrastructure that dominates the site itself and the elevated M55. But instead it expressly requires a wider recognition of scale.
87. The filtering by experienced RIBA Approved Independent Panellists has resulted in a bold yet subtle proposal that is outstanding, innovative and promotes high levels of sustainability as a result of its intrinsic design. It would also help raise

the standard of design more generally in the area. An exceptional design can simultaneously be a landmark or icon and be sensitive to the surrounding context by being bold yet subtle and here has been evaluated by experienced designers in an independent Panel as such a design. And following consideration, and rejection, of 212 others of a necessarily lesser quality. *(CD H5 section 06)*

88. With regard to there being no cotton mills in Broughton, Design Principle 6 **requires consideration of scale beyond the "neighbourhood" and to** also include instead the street, the town, the City and the Region. Only by having regard to such wider context can a true locally distinct exceptionally high quality design result because the context of the site engenders different touchstones for local. What is local for the strategic road network or for the City is not the same as that which may be local to the neighbourhood. *(CD A5 Table 1 page 28)*
89. There is no requirement for a local design review, including in national or local guidance. The purpose of such a review is to ensure high quality of development. The high standard of design is not disputed, but rather its location. The design review purpose can properly be ensured by non-local means and here was so by means of an independent International Competition.
90. In line with paragraph 132 of the Framework design quality was in fact considered in the evolution and assessment of the proposal from its filtering from the 213 original entrants and through the Phase II review by the Panel. Those **potentially affected in D'Urton Lane** have had their concerns resolved by surface water and foul drainage conditions. A Car Park Management Plan and its related Technical Notes, and as refined, would result in practical local traffic management **of D'Urton Lane**. The two Highway Authorities have expressed no objection after careful scrutiny. The Environmental Health Officer has evaluated local amenity considerations **and the Officer's Report evaluated these** and the proposal would not result in significant nor unacceptable adverse impacts, including noise. *(CD C15, C16-20, 22-26, E1 page 45)*
91. The Friends of Guild Wheel request was addressed and would result in a new shared segregated surface to fill the Guild Wheel physical infrastructure gap **along D'Urton Lane**. As an affected group, the design has been refined to provide a cross-over platform at the site entrance to ensure priority for cyclists and also their safety. The applicant has thus worked with those affected as well as those interested. Both the Parish Council and the Local Planning Authority have been able to express a view during the application and have done so. The Local Planning Authority found the proposal to comply with relevant Framework and development plan policies, including EN9 and EN8 in the Local Plan. *(CD D1 to D6, D13, C12, E1 pages 39 to 45)*
92. Further, COVID precluded by dint of the national lockdown other kinds of early, proactive and effective engagement with the community. The proposal was subject to consultation with the worshipping population and, through the International Competition, with the wider community. Throughout, the applicant has been responsive so as to result in effective engagement. Consequently, paragraph 132 of the Framework has been properly satisfied. In consequence, that paragraph requires that the application be looked on more favourably than those that cannot demonstrate such engagement. *(CD E1)*
93. Paragraph 133 of the Framework requires no more than that the Local Planning Authority has access to, and make appropriate use of tools and processes for

assessing and improving the design of development. Those tools and processes are not confined by the Framework to local design review panels and do not exclude the use of the International Competition by the applicant as a tool and process which has ensured the highest quality of design, above and beyond what might emerge from a local review. Indeed, paragraph 133 is focused toward housing development and not to places of worship. Similarly, the Framework does not confine itself to local design review panels, nor to local design advice or local review. The application here was assessed by the Local Planning Authority in light of the outcome of the International Competition and has properly satisfies paragraphs 133-134 of the Framework. (CD E1 pages 39&41)

94. The Local Planning Authority also evaluated the proposal against paragraph 130(a)-(f) of the Framework, the NDG and the SPD before reaching its conclusion. The proposal satisfies the NDG by reference to the headings which that guidance uses. The applicant is also agreeable to a materials condition to ensure the place of worship maintains its described quality as an undoubtedly **outstanding "place" far and above the good** design required of paragraph 128 of the Framework. (CD E1 pages 39 to 42)
95. Consequently, there can be no doubt that that the proposal would be a most exceptional place of worship of the highest possible design quality, that satisfies relevant design guides and paragraph 134(a) and (b) of the Framework to which, significant weight should be given.

Traffic and the Guild Wheel

96. The Guild Wheel is an existing rights of way network as described in paragraph 100 of the Framework and is also described in Policy CF1 of the NDP as a facility. The NDP evidences a public need to address safety of cyclists and use of footways; and describes the Guild Wheel **as "hugely popular"**. (CD A6 page 43, 12.3.1 (a&d))
97. Paragraph 85 of the Framework does not require the application to satisfy the second sentence because the site is well served by public transport. Nevertheless, so exceptional is the design that it proposes also to exploit opportunities to improve the scope and nature of access on foot and by cycle by volunteering improvements to the Guild Wheel **along D'Urton Lane and close to** the site. These improvements are benefits in the public interest because they cannot be categorized as mitigation nor a policy requirement. (CD E1 page 46)
98. The improvements were requested by the Friends of Guild Wheel and would comprise provision of its length along the **south side of D'Urton Lane that would connect the current 'stump' of that Wheel at the** eastern end of the Lane with the crossing at the western end. These are self-evidently improvements and not mitigation because, beyond the immediate entrance to the site, there is no effect of the proposal on pedestrians, nor on the use, by cycles, of the highway otherwise along the Lane. (CD C12, D13)
99. The ensured provision of the improved Guild Wheel would be an enhancement in accordance with paragraph 100 of the Framework. It would also be an improvement to the facility that would benefit users because it would segregate cycle traffic from vehicle road users. It follows that the proposal complies with Policy CF1. The reasoned justification evidences the public interest nature of this kind of improvement to that facility also. (CD A6 paragraphs 10.5.1 and 10.5.2)

100. There would be no safety issue arising because the proposal would ensure a raised table at its entrance by which priority in favour of cyclists would be provided (in line with the Highway Code) by signage. This layout accords with Local Transport Note 1/20 (July 2020) Cycle Infrastructure Design (Local Transport Note 1/20) Figure 10.13 and also satisfies the paragraph 10.5.7 provision to enable cyclists to maintain momentum safely, meeting the core design outcomes of safety, directness and comfort. Given that the Friends of the Guild Wheel can be taken to be knowledgeable of their own users' needs, and have requested the raised table and prioritisation, it can be concluded that **the proposal would provide for safe use of D'Urton Lane by contrast with the existing situation at the site entrance.** It follows that Policy CF1 is satisfied because the proposal would have a beneficial impact on the safety of users of the Guild Wheel **along D'Urton Lane.** (CD A6 page 43, ID 11 figure 10.13 & paragraph 10.5.7)
101. Policy AI 2 of the NDP would also be satisfied because the safety of the Guild Wheel would be improved and the amenity and enjoyment of the route along this stretch would be increased as a result of the segregation of cyclists from other vehicular road users. The reasoned justification in paragraphs 12.4.9-10 also evidences the very real public interest in the improvement of the Guild Wheel. There are no residual safety concerns. There is compliance with Policy 2 in the Core Strategy and Policy ST2, in the Local Plan as well as paragraph 111 of the Framework. (CD A page 91, A4, page 55, A6 paragraphs 12.4.9 & 12.4.10, E1 pages 45-46)
102. The net width of the highway after the Guild Wheel improvements would still leave sufficient room for 3 private cars and an emergency vehicle to pass even in the theoretical situation of a chance worshipper seeking to attend worship without having first booked a parking place in accordance with the proposed internet booking system. Car parking management is itself the subject of a planning obligation. The use of 3 marshals during prayers for traffic and parking management at the site and its immediate vicinity in the cul-de sac would also ensure no traffic issues. Vehicles would be able to turn around at the western **end of D'Urton Lane and no parking issues** would arise as a result of the wider net width along the Lane when evaluated against lane width and vehicle parameters. (ID32)

Landscape and Character and Appearance

103. The development plan includes spatial policies, and landscape and character policies but not all of these policies actually apply to the site. The reasoned justification cannot override the policy but at most can inform but not rewrite its terms. Further, the meaning of policy is an objective question of law and no party can make the terms of the policy make what they want the policy to mean.
104. The terms of Policy EN4 in the Local Plan cannot apply because the terms expressly refer to Areas of Separation shown on the Policies Map and not to any other coverage. The Map shows the Area that relates to Broughton but that **Area's** easternmost extent does not cover land farther east than the western edge of the roundabout adjacent to the site. Therefore, as a matter of law, Policy EN4 cannot apply to the site. (CD A1 page 98, A2, A3)
105. The terms of Policy EN1 in the Local Plan are also expressly referred to by reference to what is shown on the Policies Map and does cover the site. But Policy EN1 does not on its face expressly prohibit development of the site. It can

be properly interpreted to mean by implication that development not within its terms would not accord with the policy.

106. However, in the particular location of the site, Policy AD1(a) is also relevant and material. It expressly extends over any land that can be evaluated as in close proximity to the Existing Residential Area of the City of Preston. The reasoned justification informs what it means. The Map does not specifically identify Policy AD1(a). Instead, it is clear from the justification that the Area equates to the land and buildings in the main urban area of Preston and the existing urban area. That area is clearly directly south of the site. i.e. it abuts that area, being adjoined to it by the M55 or only separated from it by that road. The site can be and is within the scope of Policy AD1(a) because it is in close proximity to that area. It follows that Policy AD1(a) expressly permits the proposal, in the event that it meets the relevant criteria of (a)-(d), as is the case here. *(CD A1 page 42 & paragraphs 4.22 to 4.24, A2, A3)*
107. **The Officer's Report also evidences that the criteria are satisfied.** Policy AD1(a) also relates to design and Policy EN9 in the Local Plan relates to that as well. **The Officer's Report evaluated** that the proposal complies with Policy EN9. Criteria (c) and (d) of Policy AD1(a) would not be breached because the proposal would not over-concentrate places of worship as there is none in D'Urton Lane nor nearby; and the site would not be "over-intensified" because the car parking is capped by planning condition and a condition could also limit the land use of the place of worship to a mosque. Therefore, Policy AD1(a) can be properly said to be satisfied. *(CD A1 page 111, E1 pages 38 to 43 & 45, H1 paragraphs 5.19 to 5.22)*
108. Consequently, Policy AD1(a) expressly permits the proposal and that leaves no room for an implied prohibition under Policy EN1 as a result of not according with the categories of development expressly permitted. In this way also, the Policies AD1(a) and EN1 can properly align without conflict. Of course, in a different location where Policy AD1(a) were not to apply, but Policy EN1 were to apply, then significant weight may be given to non-compliance with Policy EN1. But this is not such a case. Instead, significant weight can be given to compliance with Policy AD1(a) even where Policy EN1 applies. This aligns also with the approach in paragraphs 84(d) and 85 of the Framework. Further, unlike Policy EN1, Policy AD1(a) is also a policy that relates to character and appearance. By contrast, Policy EN1 is silent as to character and appearance. However, Policy AD1(a) is also a spatial policy because it uses a close proximity criterion as its trigger. *(CD A1 pages 95 & 111)*
109. The site does not have any countryside characteristics but is a road construction site, having a curved shape, being in a noisy environment and having no active land use. Instead, it is a degraded, despoiled site that does not display any landscape characteristics and has no linkages, notwithstanding that in pure policy terms the open countryside policy designation covers it. The Aecom Report was evidently aware of the planned bypass because it shows it by way of **the report's** diagram of the area. It is an isolated site and its landscape can be summarized in that it has some mature trees on its boundary and that it has no rural land use. *(CD H11 paragraph 8.2, K4 page 9)*
110. The site plays no part in the separation between the settlement of Broughton and Preston, whereas the actual separation gap is further west. The site is also not able to be appreciated in respect of the Policy EN4 gap because it is to the rear when one is travelling along Garstang Road. The site is also separate from the

Broughton settlement. It is not situated in a valued landscape nor within the setting of an Area of Outstanding Natural Beauty. It has no intrinsic value either because it remains a degraded and despoiled former highway construction compound site previously serving as a car park and storage area for highway construction. There are no designated views. (CD A2, A3, H11 paragraph 5.5, H12 Appendix A)

111. The proposal would be a modern interpretation of a mosque, with a tall slender element integral with its design that is very much appropriate for its particular setting and appropriate for its place. The mosque and church are only seen at the same time if travelling along Garstang Road and the tunnel of trees makes it very difficult to see both in the same views. When experienced from the correct height of a person, at 1.5m or sitting in a private car, the viewer almost never experiences the church and minaret tower in the same view. Instead, the bypass has caused a fundamental change to the situation of the church within the area. (CD H11 paragraph 5.11)
112. In View Point 10, from Footpath F4, the church tower and minaret tower would be visible. However, over time the viewer would not notice the change as the minaret tower would become part of the scene in much the same way as the church tower is today. The minaret tower would not dominate or be overbearing **but would be "there"**. The views from the Guild Wheel, such as can be obtained at all, would be of an attractive place to gather in, and appropriate for a building of this scale. (CD H11 paragraphs 5.11, 8.11 & 8.39, H12 Appendix E)
113. The proposal within the site would be attractive and appropriate, with a landscape comprised of hard and soft elements. It provides an opportunity for a high quality building set in a high quality public realm that is as important as the building element. This can be ensured by condition also, so as to be given considerable weight. The genius of the proposal is that the building does deliver an icon whilst simultaneously responding appropriately to its context. It is a dovetailing of design. The landscape is there to complement, to enhance, the building and not to screen it. That is not mitigation but enhancement. There is no evidence of Ash Die back (and also few if any Ash trees in the locality).

Trees and Landscaping

114. The application is made in outline and reserves landscaping for future determination. An illustrative masterplan shows what may be situated on the site. However, there is also an environmental plan for the bypass and the disposition of trees must be adhered to in line with the planning permission. A site inspection reveals that the approved bypass landscape scheme remains currently incomplete. Policy NE2 in the NDP requires that the visual impact of new development be minimized by landscape screening and tree planting. The application is accompanied by an Arboricultural Report identifying the extent of tree and hedgerow retention. (CD A6 page 15, C14, H12 Appendix F, ID 16)
115. The application offers an opportunity, to amplify that approved landscaping by means of additional tree planting on the site to ensure the visual impact of the bypass, as well as the proposal, is minimized. This can be secured by a planning condition binding the illustrative site plan and thereby details of that illustrative scheme would remain for reserved matters and in line with the envisaged scheme, as opposed to a different scheme. In that way, the proposal could also be properly said to comply with Policy NE2.

Heritage

116. Paragraph 202 of the Framework applies to the proposal because, however evaluated, there is some harm to the setting of the church tower. The extent of that harm falls exclusively within the scope of that paragraph, however many effects may or may not rise here. The issue is therefore limited to the degree of weight. The key question remains whether the setting of a particular heritage asset can be experienced in relation to the proposal, as per the definition of a setting of a heritage asset that is set out in the Glossary to the Framework. If it cannot, then the setting cannot be affected.
117. The International Competition included a drone flight over the environs of the site that included the church. The architect visited the site before the Phase II evaluation of the design. The church is listed Grade II* and so attracts the operation of section 66(1) of the LBCA Act, but in relation to the evaluation of setting alone. The minaret would be visible in the same view as the tower in Panorama 1 and some harm would result from that co-visibility, so that limited harm would occur to the setting of the church tower but would attract moderate weight. No other setting or heritage asset would be affected by the proposal. Paragraph 203 of the Framework is not relevant. *(CD H7 Section 9, H8 pages 14 to 15 & 19)*
118. The law is now clear on the evaluation of harm. Great weight must be given to the exercise of the duty, whereas the weight that falls to be attributed to the particular harm arising (and that falls within paragraph 202) is a matter of fact sensitive evaluation whose lower bench line is not determined by the Framework. **"Conservation" is not the same as "preservation"**. Conservation can be secured by either preservation or enhancement. Consequently, the lowest (and highest) bench line **for weight is not, in law, "great" such that the weight can only** increase from that point but is a spectrum required to be evaluated in the normal way by the decision maker as a matter of planning judgement. Rather, the great weight is the weight given to and discharged by the carrying out of the section 66(1) duty by means of the careful evaluation (special attention) of the situation. *(CD G7 paragraphs 73 to 80)*
119. The Local Planning Authority has evaluated no effects on any heritage asset other than the Church tower, and considers negligible effect would result upon the setting. The applicant has evaluated the effect as limited. *(CD E1, pages 43 to 45, D15, H7 paragraph 6.1)*
120. The panoramas of the applicant are taken at real eye level of 1.5m. They are not an artificially high genesis of viewpoints that engenders views of the church tower in situations that would otherwise not be actually observable, and inflated to great or very great weight. The **applicant's** attribution of weight must be preferred to that of the Parish Council. Limited harm to the setting of the church tower in Panorama 1 as a result of the co-visibility of the proposed minaret in the same view as the Church tower would fail to preserve the setting of that heritage asset. This is because of the harm to that setting and its consequent effect to reduce by a limited amount the significance of the tower. That limited harm and resulting failure to preserve the listed building is attributed moderate weight because the effect of the bypass construction is to reduce the setting of the church tower *(CD H7 paragraph 9.11)*

121. Consequently, paragraph 202 of the Framework requires that the public benefits be weighed against that moderately weighted limited harm, which under paragraph 202 is termed less than substantial harm. A Statement of Public Benefits evidences these benefits of the proposal. **The Officer's Report identifies two public benefits, a much-needed place of worship; and the outstanding design.** A further public benefit is the improvement of the Guild Wheel. Consequently, the proposal complies with Policy EN9 in the Local Plan and also with General Policy HE in the NDP, first paragraph. No view identified in the second part of Policy HE is affected. (CD A1 page 111, A6 page 60, C36, E1 page 44)

Drainage

122. The previously developed nature of the site also results in potential drainage issues and its previous use means, understandably, it has no drainage connection. The application is accompanied by a Drainage Strategy which explains how, when landscaped, green field run off rates can be ensured. A SuDS Pro-Forma survey shows how surface water would be dealt with. Drainage concerns cannot go to the principle of development in this outline application because the surface water drainage and attenuation is shown and a planning condition now ensures that foul drainage would be resolved through submission of further details. (CD C19, C25, C34)

Other Aspects of Sustainability

123. The Framework makes clear that the concept of sustainability is not exclusively concerned with mechanical and electrical installations, or artificial scoring systems, in development. The Design and Access Statement explains how good design is embedded in the building fabric by means of a hypocaust passive cooling system in the external wall design and the requirement to include photovoltaic cells on the flat roof. There is no requirement for such exceptional design. It is volunteered by the proposal. (CD C17)

124. Policy 27 in the Core Strategy requires what (at least) BREEAM describes as a "very good" **standard as a policy requirement.** The proposal complies with that policy by means of a planning condition and no more is required. The proposal by its exceptional design is also voluntarily highly sustainable. The intention of such passive systems embedded in the fabric of the design ensures that ongoing operational costs are minimized for future generations. That too, is an aspect of sustainability, albeit also immeasurable. (CD A4 page 128)

Biodiversity

125. Paragraph 174(d) of The Framework supports the provision of a net gain in biodiversity. The Ecological Report concludes that the site has potential to increase biodiversity by means of tree planting as part of the landscaping scheme. A condition ensures a minimum net gain for biodiversity from the existing low conservation value and with the limited ecological value of the site. (CD C35)

Travel Plan

126. A transport assessment accompanied the application, and highways technical notes. The macro transport effects of the development has been reviewed and evaluated as acceptable by the County and Strategic Highway Authorities. The

Officer Report evaluates the transport effects as acceptable. (CD C22 to C24, C38, D16 to 20, D22 to 26, E1 pages 46 to 49)

127. In line with an outline application, the Travel Plan shows what can be secured at the site and a planning condition ensures that further detail is engendered on application to the Local Planning Authority in due course. The Car Parking Management Plan Technical Note records the maximum number of car parking spaces would be 150 and that figure is derived from the maximum of 248 prayer mats that would be situated in the place of worship. Additional numbers of users above that 248 would be low due to cultural factors by which women pray separately in the building and are not required to be at all prayers. (CD C16 paragraph 1.1.3, C39)

Planning Conditions and Obligations

128. The application would be subject to a series of conditions and an obligation in relation to the travel plan and operations. The Local Planning Authority and Highway Authorities endorse the conditions and obligation. (ID32)

Conclusions

129. The proposal complies with the development plan and the material consideration of the Framework reinforces that conditional planning permission be granted for this most exceptional high quality place of worship. Further and in any event, the proposal should be granted for the reasons and evaluation set out in the **Officer's Report** to like effect, as amplified by the inquiry evidence itself. (CD E1)

The Case for Preston City Council

130. The City **Council's case is fully set out in its evidence**, and in its opening and closing submissions. A summary of the main points are set out below. (ID30)

Introduction

131. This site is situated at a strategic gateway to the city of Preston and provides an opportunity for a landmark building which reflects the image and identity of Preston. It is a city which is proud of its industrial heritage, the socially and religiously diverse community that lives in it and wants to further develop Preston in a sustainable and attractive way. Social inclusion is a foundation of this community and this Council, and it is a principle that the City Council views as being enshrined in this proposal.

The extent to which the proposed development is consistent with the development plan for the area

132. It is common ground that as the **site sits within the 'open countryside'** the scheme would be contrary to Policy 1 in the Core Strategy and Policy EN1 in the Local Plan. The centrality of these policies to the spatial strategy renders the proposal as contrary to the development plan as a whole. The site should not be considered previously developed land because, although the land was previously developed, it has since blended into the landscape. (CD I2 Section 4.2)
133. However, this does not mean that there is no support for the proposal from the development plan. There are multiple policies which the proposal accords with, as set out in the SoCG. It accords with Policy 25 which is the most specific policy in the development plan in relation to places of worship. Policy 25 concerns

'community facilities' which is defined as including 'places of worship'. The aim of the policy is to ensure that there is a sufficient community provision by development proposals achieving several criteria including meeting defined need at a location which is accessible by all means of transport. *(CD A4 page 121, B15 paragraph 22)*

134. That the proposal conflicts **with the 'Areas of Separation' policies due to the** location of the site near to, but not within such an Area, is not the correct interpretation of the policies. They are triggered and concerned with development within those policy defined areas of separation. Policies 19 and EN4 have no relevance to this determination. *(CD A4 page 109, A1 page 98)*
135. Statements of policy are to be interpreted objectively in accordance with the language used and in its proper context. The supporting text is an aid to the interpretation of its policies but it does not form part of the policy and cannot override it. A concern was raised that the City Council had not had sufficient regard to the NDP. The 3 relevant policies raised (NE2, CF1, General Policy HE) are either not triggered or actively support the proposal.
136. In relation to NE2, there are two elements to the policy. There is a more general requirement that **"The visual impact of new development... should be minimised by landscape screening and tree planting"** and a more specific element **"particularly that on the edge of the defined settlement of Broughton when viewed from approaching routes"**. **The 'defined settlement of Broughton' refers** to the settlement boundary of Broughton Village. On that basis, it cannot be said that the site sits on the edge of the defined boundary given it sits a significant distance away from it. The specific element of NE2 is not triggered. *(CD A6, page 15, paragraph 8.2.5 – red hatching)*
137. Instead, the only relevant element under the policy is a general requirement to minimise (rather than entirely negate) the visual impact of new development. This is a matter that can and will be dealt with at the reserved matters stage when dealing with landscape. The illustrative landscape masterplan which shows tree and hedge planting around the building showing the intention to provide screening and planting. There is no conflict with Policy NE2 and at this outline stage it has little relevance. *(CD H12 Appendix F, 12 paragraph 4.6.5.)*
138. In relation to Policy CF1, the proposal would derive support. The proposal through the provision of a 3m segregated cycleway/footway, where currently none, exists would enhance it. The Friends of the Guild Wheel after initially raising concerns noted that they were content with the proposal. *(CD A6 page 43, D12, D13)*
139. General Policy HE has 2 different elements. The more specific element is the second paragraph which concerns specific views set out on a map and whether the proposal would have a significant detrimental impact. The views which the second paragraph of the policy concerns are only those shown on the map rather than any wider views. The only potentially relevant view on this basis could be VP8. But it cannot be said that this scheme would have even a detrimental impact and certainly not a significant one. The proposal would not conflict with the second paragraph of General Policy HE. *(CD A6 paragraph 11.4.1, CD H12 Appendix E)*
140. Therefore, the City Council has had regard to the NDP as part of their original determination and as part of their positive case at this inquiry. There is no policy

within the NDP that would directly conflict with the proposal. Instead, they are either not directly relevant or actively support the proposal. (CD E1)

141. Overall, the proposal would conflict with the development plan as a whole due to the conflict with Policy 1 in the Core Strategy and Policy EN1 in the Local Plan. Thus, it will require material considerations to depart from it. But this should not be interpreted as meaning that the development plan should be set to one side. It remains the case that there are multiple policies within the plan which support the proposal and from which it can therefore draw support.

The effect on the significance of designated heritage assets, in particular the Church of St John the Baptist, Broughton C of E Primary School and the Church Cottage Museum

142. This proposal would have only a negligible impact on the Church of St John the Baptist. This impact arises from that there will be a limited visual connection between the Church and the proposed building, and therefore the site will be within the setting of the Church. This setting has been significantly altered and affected by the construction of James Towers Way which sits between the Church and the site. The effect of this was recognised in the Bypass Report to the Secretary of State for Transport as having an "urbanising" effect on the setting which would be part of the "fundamental changes" to the area. The site must be viewed in its current context which is one dominated and defined by the surrounding local and strategic road network. (CD H9 paragraphs 7.62 & 7.63)
143. The proposal would not be featured in any designated views of the Church, and the views from the churchyard to the site over the bypass would be heavily filtered by trees and would be further minimised if the screening planting as part of the bypass permission is fully delivered by LCC. It is LCC who are responsible for the enforcement of these works, not the City Council. Co-visibility does not automatically equate to harm. The heritage impact is negligible. (ID 5 paragraphs IR6.102, IR12.32 to IR12.34; ID16)
144. However, a **negligible level of harm is still a harm, and it is a 'less than substantial' harm. It therefore must be given 'great weight' (per Framework paragraph 199)**, it still triggers the statutory duty under Section 66 of the LBCA Act, and it still must be weighed against the public benefits (per Framework paragraph 202). This exercise results in the position that permission should be granted despite the less than substantial harm to the Church.

The effect on highway safety by way of traffic generation, car parking and the Guild Wheel cycling and walking route

145. The Transport Assessment, Technical Highways Note and Car Park Management Plan show that the proposal would not have either an unacceptable impact on highway safety, nor a residual severe cumulative effect on the road network. There is no basis for a refusal under the Framework paragraph 111. (CD C15, C22-24, C38)
146. While the car park does not provide the maximum figure set out in policy, this will operate to encourage a modal shift to more sustainable travel methods. Furthermore, the level of parking provision reflects the fact that the nature of worship and the Muslim faith mean that it is very common for worshippers to car share and travel to the mosque with others. The additional controls placed on parking through the management plan which requires pre-booking and is

enforced by stewards on site, and off-site by the double yellow lines on both sides all **the way down this section of D'Urton Lane means** there is confidence that no parking issues will be caused.

147. The proposal will also provide improvements to the Guild Wheel through the provision of a segregated shared cycle and footway, and the introduction of raised table junctions with cycleway priority. These will be a safety improvements on the current situation and should be viewed as a standalone benefit and not **only mitigation against the increased vehicular use of D'Urton Lane.** (CD C12)

The design quality of the proposed development

148. The design of the proposal is an outstanding and innovative design which the City Council gives significant weight to in accordance with the Framework paragraph 134 b). The design was chosen after a RIBA-organised international competition which had 213 submissions and of which this was the unanimous winner. This is reflected in the quality of the design of the proposal. The design achieves its aspirations for this to be a landmark building which provides a strong identity for Preston. This is a critical benefit given the location of the site at a strategic gateway to the city. **The City Council agree with the applicant's assessment.**
149. Whether the design should have undergone an independent design review **through the 'Places Matter' regional design review panel** is not a policy requirement. The closest the development plan gets to this is where the supporting text to Policy EN9 in the Local Plan notes that the City Council can "encourage" design to go through the process. The Framework paragraph 133 simply encourages local planning authorities to make "appropriate use" of tools such as design reviews. This is hardly a clear policy directive that the proposal should have been designed reviewed at the regional level to be considered acceptable. It would not have been appropriate to further design review the design in the context of a proposal that had been the subject of an international design competition **(the 2nd stage of which was 'much closer' to a design review)** and accorded with the NDG. (CD A1 paragraph 8.46 , I2 paragraphs 4.5.3 to 4.5.5)
150. Emphasis is to be placed on the sustainability of the design. The focus on the **BREEAM energy efficiency standard of 'Very Good' as being average that is both a misinterpretation of BREEAM standard ('Very Good' is not 'Average'), and directly equates sustainability with BREEAM.** However, there is a broader meaning to sustainability. This design should be viewed as sustainable because of the predominantly natural ventilation (with mechanical ventilation only triggering in a period of high occupation), the intention to incorporate horizontal ground source heat pumps and the incorporation of PV panels. This is embedded in the wider design of the building and underlies that the sustainability of the design is an important feature of it. (ID I2 paragraph 4.9.1)
151. This is exactly the type of outstanding and innovative design that national and local policy promotes and which Preston deserves. It is a significant benefit to this proposal.

The effect on the character and appearance of the area, including the countryside and Broughton village

152. It is important to judge the site as it appears on the ground rather than according to any policy designation. Policy EN1 is a spatial policy and does not itself have

any direct relevance to landscape or visual matters. This was a matter that was previously explored and determined in the Goosnargh appeals. (*ID 22 paragraph 42*)

153. The Site does not contribute to either the open countryside or the village of Broughton. The reason being that it is separated from the former (in perception terms) by the local and strategic road infrastructure, and from the latter by both the road network and by around half a mile of distance. The development of this site would therefore not have an adverse effect on either the character and appearance of the area or on Broughton village. (*Examination in Chief Ms Holden*)

Planning balance, including need and the benefits of the scheme, as well as drainage and other considerations

154. It is important to highlight the other benefits which would arise from the proposal. It will first and foremost be a mosque which will cater to the evidenced local needs of the community. The evidence of the applicant is accepted in that there is a need for a mosque in this location. This is illustrated by the fact that the current distribution of mosques in Preston is focused on the centre with only one northerly mosque. There are at least 311 Muslim households where a mosque at this location would become their closest mosque. (*CD C30, I2 Section 4.8*)
155. This position has then been further enhanced by the significant amount of consultation responses to the original application/inquiry and the interested parties who appeared at the inquiry to give heartfelt and genuine evidence as to the benefit a mosque in this location would bring to their lives. There is a clear evidenced local community need for the proposal.
156. Another key benefit of this scheme is social inclusion. Supporters of the proposal spoke of how the Muslim faith is an open and inclusive one where charity and community outreach are key principles. The proposal would both welcome those who wished to explore and understand the Muslim faith, and through its multi-purpose hall that will be open to all it will provide a space for the wider community to use. It will encourage the engagement of people of different faiths and backgrounds. This is important because it is a key principle for the City Council to allow for the creation of equal and cohesive communities and increase **diversity. This reflects the 'social' objective which forms one of the three** overarching objectives of sustainable development which sits at the heart of the Framework. (*CD I2 paragraphs 4.81 to 4.8.2*)
157. That the proposal contributes so strongly to the social objective by both meeting a local need and promoting social inclusion and cohesion is something the City Council give at least moderate weight to.
158. There are also the environmental benefits which come from the sustainable design (which should carry significant weight) and the unchallenged economic benefits that come from the creation of employment during the construction phase (which should carry moderate weight).
159. Drainage can be dealt with both by noting that there is a detailed condition that will require the submission and approval of a suitable drainage strategy (both surface and foul) before the proposal is commenced. This will ensure that there is an acceptable drainage solution. This is a widely used approach to drainage as is reflected in the fact that both United Utilities and the Lead Local Flood

Authority have no objection. There are no concerns that an appropriate drainage solution could be accommodated on the site. (CD D27 to D29)

160. As religion/belief is a protected characteristic under the Equality Act 2010 there is a duty via section 149 to have due regard to the need to eliminate discrimination/harassment/victimisation, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Although the Public Sector Equality Duty is not a duty to achieve results but simply a duty to have due regard to the need to achieve the goals identified in paras (a) to (c) of section 149(1), the proposal would clearly achieve the aims and objectives of the 2010 Act and s.149 (1) in particular. The proposal will through its promotion of social inclusion – help to eliminate discrimination, advance equality of opportunity, and foster good relations between those of the Muslim faith and non-Muslims.
161. The material considerations are the cumulative benefits that arise. It is outstanding and innovatively designed, with sustainability incorporated into it, that it will meet an evidenced local community need while also promoting social inclusion, that it will bring an economic benefit and improve the Guild Wheel. Together these benefits are fundamental and constitute the material considerations that indicate that permission should be granted despite the conflict with the development plan.
162. The proposal is to be welcomed at a gateway to the City of Preston. It would provide a landmark telling those arriving that this is a city proud of its heritage, its socially diverse and inclusive community, and its outstandingly designed and sustainable build form. It was rightly granted permission by Members, and one which respectfully the Secretary of State should do the same.

The Case for the Rule 6 Party: The Broughton in Amounderness Parish Council

163. The Parish **Council's case is fully set out in its evidence, and in its opening and closing submissions.** A summary of the main points are set out below. (ID29)

Introduction and Summary

164. The Parish Council covers a significant rural area to the north of Preston including the site. The proposal is contrary to the policies in three adopted, up to date plans. The harms are multiple and at the high end of the scale. The benefits were merely assumed and accepted at face value with no scrutiny and little or no supporting evidence. The proposal is not interested in the rural context of the site, or its allocation as open countryside in the adopted development plan, and consultation with the local community has not been considered important over either the site or design.
165. There is confusion as to what functions would be included, and there is no evidence even on the maximum number of people that might be on site which makes an accurate estimate of potential traffic and other effects impossible. The lack of consultation over need, potential uses (before the RIBA competition), the site itself, or alternatives is concerning.

166. The local plan led approach is democratic, and it sets rules for all development to follow. No special treatment or unequal treatment can arise by implementing such an approach which is subject to round after round of consultation. As the local MP Ben Wallace has stated, "Rules is Rules".
167. The proposal would harm the landscape and listed heritage assets. It can either have no landscape impact or be iconic. Common sense suggests it cannot be both. Jumping the M55 into designated open countryside to the north is clearly wrong. If approved, the local and neighbourhood plans may as well be discarded and Localism abandoned. It would be contrary to the very principle of local plans and Localism.
168. A more suitably located mosque would come with all the benefits and none of the harms that are apparent on this site. It is an unpopular proposal that on every level: policy, spatial, visual, cultural, practical, highway, heritage, and rural open character, is wrong. There is potential use for prayer and other activities at the new community centre at the Toll Bar Cottage in Broughton, which is considered a generous offer. A consensus is not actually that far out of reach. But this necessitates a refusal of the proposal, and setting aside any thoughts of judicial review, for a more ideal solution to the location to be found to resolve disagreement.

Parish Council

169. The Parish Council is a very active one. There was an extensive public consultation exercise to determine the needs and wishes of everyone in the area, which culminated in the adoption in December 2018 of the NDP. A further exercise in 2020 involved every household to check if the priorities in the Parish Action Plan (PAP) were up to date. There is no evidence that either the NDP or PAP are anything other than up to date and prepared in accordance with all relevant legislation, including the Equalities Act. The Parish did all they were required to, and more, to engage the local community and find out the needs and views of local residents. No-one had come forward requesting a facility for any faith either during the NDP process or PAP consultation, even though there was ample opportunity. *(CD J4 paragraphs 1.1&5.2, ID 13 paragraph 56 from Extract)*

Current Status of the Site

170. Before temporary use for by-pass construction, the site had been in agricultural use with a small part of it under farm buildings. After the bypass was completed, the site was levelled and seeded, and is currently grassland subject to a management plan. This is consistent with some of the rough ground underfoot. Permitted development rights in part 4 of the General Permitted Development Order 2015 require the land to be reinstated to its condition before the temporary development was carried out and LCC suggested that "*this requirement has been complied regarding the removal of buildings / plant and surfacing materials and replacement of soils.*" The City Council do not consider **that it is 'previously developed'**. The site is green and open, and certainly not derelict. It contributes to the separation of the rural village of Broughton and the built-up area of Preston. *(ID 20 third paragraph in email from LCC)*
171. When the site was auctioned, any potential purchaser would have been aware that it was designated as open countryside under a very restrictive policy and that prospects of securing consent for any development that did not meet the

policy exemptions were remote. It is essentially a speculative planning application.

172. The site does not abut the edge of the built-up area of Preston. It is separated from the village of Broughton by the green enclave that includes the brook, church, and other listed heritage assets. To the south, the M55 provides a major barrier that separates it from the North West Preston Development area and the wider built-up area of Preston. The M55 acts as a barrier to anyone who would want to access the proposal from Preston, particularly on foot but also by car. (CD A7 page 465)

Is the proposed development consistent with the development plan?

173. It is agreed that the proposal is in conflict with Policy 1(f) and Policy EN1. These are the most important policies at play in the development plan as they seek to direct development to urban areas and away from open countryside. The proposal would harm the intention to provide a clear limit to the City of Preston. Although the site area is small the proposal is promoted as a landmark structure and is considered to be a major development. (CD J2 paragraph 4.4, 4.16 & 4.19)
174. The NDP was only adopted 4 years ago. It is a material consideration, and the proposal has been progressed without due regard to policies within it including NE2, CF1 and HE1. The exhaustive process that led to them has been explained and their significance has also been explained in evidence. All 3 development plans say directly and indirectly that this is an inappropriate place for this proposal. The application should be determined in line with these plans, otherwise what is the point of a plan-led system. (CD J2 paragraphs 4.38-4.40)
175. The NDP is not silent on places of worship. There are several policies to encourage and control development that may not have been anticipated, and the current proposal runs clearly counter to these. There is therefore no need for the Framework paragraph 84d to speak into a gap that does not exist. In any case, paragraph 84 is concerned with the rural economy, and Broughton is a semi-rural village just outside Preston. (CD A6 Section 10)
176. The Goosnargh appeal decisions do not aid the case for the proposal. While the **Inspector's interpretation is that the primary purpose of Policy EN1 in the Local Plan is to "support the spatial strategy in directing development to more sustainable higher order centres"**, he also states that it is "axiomatic that a restriction on built development in the open countryside would protect openness and character". If there is a need for the proposal, Policy EN1 is correct in directing it to a more sustainable higher order centre and it is also axiomatic that preventing this large and intrusive major development in the open countryside would protect its openness and character, although it is acknowledged that the appeal decisions do not consider the latter to be the primary purpose of the policy. Both appeals were turned down as being contrary to Policy EN1 because they were in designated open countryside and due to the change they would make to the character of the village. (ID 22 paragraph 42)

The effect on the significance of designated heritage assets, in particular the Church, Broughton School and the Church Cottage Museum

177. There was agreement **that there was harm in the category 'less than substantial'** to the setting of the Grade II* listed church and that this should be weighed in the planning balance. The policies related to the heritage assets in the NDP were

created with rigour. A detailed Heritage and Character Assessment was commissioned in full knowledge of the bypass construction. While the new road has affected the setting, the removal of trees has opened up additional views which are a benefit in some ways, and this makes the cluster more vulnerable to domination by the proposal. (CD J5 paragraph 4.7, K4 Appendix A)

178. Some urbanisation of the setting by the road does not mean that the rural character stops. **There is a residual rural character that goes through to D'Urton Lane and the site. After the bypass was built, the quiet nature of D'Urton Lane,** the scattered dwellings and the application site provide a mitigation which retains a rural character and provides a rural context.
179. Other listed structures formed part of the setting as they were experienced in a group, and that direct visual contact was not necessary as, for instance standing in the churchyard you would be aware of the church and the assets would be experienced as a group. Apart from the church, these include the Grade II listed Broughton C of E Primary School and the Church Cottage Museum, Sundial, Village Stocks and Mounting Block. (CD J5 paragraphs 1.4, 3.2 to 3.8)
180. **Broughton means 'Settlement on a Brook', and the original church is medieval.** The museum and original school are 16th century. The church enclave is the original village core. (CD J5 paragraph 3.14)
181. The locally listed buildings (Church Hill Cottage/Farm, White Cottage and Springfield Cottage) are immediately adjacent to the site and would be seen with the proposal as these heritage assets are walked past. Paragraph 194 of the Framework is clear that all heritage assets require assessment. This includes undesignated heritage assets. **D'Urton Lane would gain a 3m wide raised cycleway** with various traffic management markings and equipment and potentially separated by bollards (to prevent unauthorised parking). The proposed 30m minaret would tower over the leafy lane. (ID 8 **under 'Broughton'**, CD J5 paragraphs 1.5&3.9)
182. With regard to mill chimneys as a regional characteristic and the citing of Cromford, this is in the Midlands. The hinterland of Preston, including Broughton has never had this sort of mill or chimney.

The effect on highway safety by way of traffic generation, car parking and the Guild Wheel cycling and walking route

183. The transport assessment was based on 150 parking spaces and 248 prayer mats reserved for men only. The proposal would not meet the parking standards required by the Local Plan. There will be an undetermined number of additional people including women, children, and people to manage the building and car parking. Some of these may be counted in the 248, but others may not be – for instance a car parking attendant might supervise parking at both sessions or need to stay on duty to supervise late arrivals. The maximum number of people on-site is not known but could be considerably higher than 248. (CD A1 Appendix B, C38 paragraph 3.1)
184. The resultant access and parking arrangements are convoluted, and the plans assume a high level of car sharing and walking and bus access. **D'Urton Lane** could become a chaos of cars, pedestrians, cyclists, and unauthorised parking. There were no concerns about traffic on the general highway network, and it was possible that the car parking management solution might work in theory.

However, there was no slack at all in the proposals and the imperative to pray would mean that people without bookings would still arrive, and park anyway. While other mosques might have a safety valve of sides streets or alternative car parks, this was not the situation here. The theoretical solution is that worshippers would need to be turned around either before or after the barrier. But in practice they would cause traffic congestion and unauthorised parking in **D'Urton Lane**, out of sight of the stewards or in the wider residential area.

185. An interested party identified that the site would be ideal for people driving on the M55 stopping off to pray. While this is not the intention of the applicant, it is easy to see the attraction, and the potential to cause further problems.
186. While theoretically heavy-handed traffic enforcement might work, this would be difficult in practice. Things that are known would fail cannot be allowed. Emergency services might also have difficulty accessing the building.
187. From the south of the M55 (where most demand will arise), a walking route would require a tortuous and unpleasant crossing under the M55. There are relatively few potential attendees from north of the M55, but access to the mosque from this direction would also require crossing either the four-lane bypass or a major roundabout.
188. In summary, the unusual nature of the development from a traffic generation and parking point of view and the strict nature of the arrangements needed to mitigate these mean that there are still significant residual transport issues and very little headroom to solve them.

Guild Wheel

189. It is claimed that a new shared footway/cycleway will be a scheme benefit. However, there has not been a count or survey of users and it is derived from a general request for segregated facilities along the whole route. The raised route is a response to the proposed significant increase in traffic on a currently quiet rural cul-de-sac with little traffic. The changes are mitigation for the increase in inconvenience and danger posed by this increase in traffic and cannot be regarded as a genuine benefit. The shared footway/cycleway would also need to be protected by further measures such as bollards to prevent unauthorised parking. (CD J9)

Design Quality

190. In parts of Preston this building could be an asset. What is questionable is the architectural brief, the exclusion of the local Broughton community from it, and the obviously cramped and inappropriate site. The intention of the design is to mimic mills and their chimneys. While these may be typical of the urban town of Preston, mills and their chimneys of this sort have never existed in Broughton or its immediate surroundings. They form no part of the local context. What the site represents is residual rural elements, important in landscape and spatial terms for its rural nature. The design has not been shaped by its context.
191. The applicant design witness was part of the RIBA competition panel and considered that the minaret was a crucial part of the design and that removing the minaret or making it less prominent would compromise the design. It was also suggested that the scheme might even be of national importance and

confirmed that the intention was that it should be a landmark building. This is all the more reason for it to conform to national policy.

192. It is contended that in light of the RIBA competition process it was not necessary to use the approach specified in the Framework and the SPD. Covid-19 was also invoked as a reason for lack of local consultation. This did not seem to prevent an exhibition being held of designs for the potential congregation. It has to be emphasised that the RIBA panel is not a review panel, and the process that was gone through is not a Design Review. It is not simply true to assert that it worked very much as a Design Review panel would. The RIBA panel member is there for process reasons, not evaluation. (CD A5 paragraphs 4.23 to 4.26)
193. Design guidance within the Framework is clear that developments should be sympathetic to local character and history, including the landscape setting and should be subject to appropriate design review and should be open to proactive and effective engagement with those communities affected. Despite this, it was contended that a Design Review process was not necessary.
194. It is incorrect to consider that the design had been Design Reviewed by RIBA. There was not any sort of assessment or advice during the course of the application, which seems strange for such a major, iconic proposal.

The effect on the character and appearance of the area, including the countryside and Broughton village

195. Policy AD1(a) of the Local Plan requires that the design and scale of development should be sensitive to and in keeping with the character and appearance of the area. But the design brief makes no mention that the site is within the setting of a highly graded heritage asset and locally listed buildings, and the landscape context of the site is not mentioned. It is not surprising that the final design does not take account of the character and appearance of the area. (CD A1 page 42)
196. The proposal has been designed as a prominent, iconic, structure that by definition will dominate. Yet it is claimed it will not affect the residual rural and open character and appearance of the site and its surroundings. It cannot be an iconic structure that is also unobtrusive in the landscape.

Planning balance including need and the benefits

Need

197. Only after this application was presented to the Planning Committee and was deferred did the applicant produce a map showing which Muslim households would have the application site as their nearest mosque. The great majority of the potential users live south of the M55 and very few live north of the M55. It is not known how many of the households plotted would transfer. There has not been any checking or validation of this data. Submissions of those who said they would use a new mosque were heartfelt, but these submissions are anecdotal and do not objectively establish need. (CD C30)
198. It was said that the mosque would provide a base for a scout troop, but also confirmed that the group does not need to be based at a mosque. It is understood that there is capacity to base a troop at the existing scout hut in Broughton. This might be preferable from a community integration point of view.

Interested parties suggested that there was a need for a Faith School and also childcare. These are potential uses that are not part of the application and suggests that more research is required on need, after which a search for a suitable site could be made.

199. The applicant has not proven a need for their scheme. There may be a need for enlarged or more mosques overall for the Muslim community in north Preston, but this should be a joint exercise with the City Council to identify appropriate areas and land. During the three separate, extensive consultations on the three development plans, the plan making process has not identified a need for a mosque. The work undertaken by the applicant following the Planning Committee, is an exercise to justify a site that has already been chosen. (CD J2 Section 5)

Wider community facilities

200. The wider community of Broughton may visit on open days, but any other wider use will inevitably be limited. The need for a community facility set out in the NDP has been met by the Toll Bar Cottage community meeting rooms and café, the use of the school halls and the Broughton club concert hall, as well as by hotels. There is currently no unmet wider community need. (CD A6 Section 10)

Sustainability

201. The sustainability, BREEAM, climate change or renewable energy has not been checked with those who might have had those skills to see if the claims were justified. There was not any sort of quantification such as carbon calculations.
202. **The building would meet BREEAM 'very good', which is the middle of the scale, and just policy compliant.** This is disappointing given that the Cambridge Mosque **has achieved 'Excellent'**. Policy compliance is not evidence of excellence or innovation.
203. **The only committed 'sustainable' features** were solar panels of unknown rating, and a passive ventilation stack (although a gas boiler was still required). There was an aspiration (only) to provide a horizontal ground-source heat pump which was subject to feasibility and funding. These need a large underground area which might interfere with the drainage arrangements, and are inefficient when shaded, so its provision must be in doubt even if it was funded.
204. There has been a failure to demonstrate that this is anything other than a very **ordinary 'business as usual' building that will have a high carbon footprint in both** its concrete construction and be a fossil-fuelled and car-based operation with a minimal level of renewable energy. (CD J2 Section 9)

Drainage

205. Surface water could be adequately dealt with by condition. However, the proposal cannot connect to the foul water drainage system and there is significant uncertainty as to the maximum occupancy of the mosque, both during prayers and for other events. No calculations have been provided as to the amount of foul water, or how this would be stored and treated to a standard that it could be discharged to surface water drainage. In the absence of these details, it has not been shown that foul water could be effectively dealt with within the site. (CD J2 Section 9)

Conclusion

206. The Parish Council has tried to work constructively with the City Council and the applicant on this application and would support a consultation in conjunction with the other rural parishes to identify an appropriate site for a new mosque in North Preston.
207. It has been contended that need, community facilities, architecture, sustainability, and the Guild Wheel cycle route are positive in the planning balance. But none of these benefits are proven, and do not make up the exceptional circumstances that would be necessary to over-ride the three adopted development plans for the site.
208. The Muslim community should have the facilities it needs. But this is a sensitive site that is not only not allocated for development but where planning policies actively deter development. The proposal is on an open, green site that would run counter to the policies in three adopted and up to date development plans that seek to protect open countryside and heritage assets. It falls into none of the policy exemptions. It would appear as an overly dominant addition in the landscape, cause harm to heritage assets, cause parking issues, and is cramped and shoehorned into its plot. It is a speculative application on a piece of land in designated open countryside that the applicant owns. The application should be refused.

Interested Parties

209. A number of interested parties addressed the inquiry, summarised as follows.
210. *Alf Clempson on behalf of Ben Wallace MP*, in objection. Requested and welcomed the calling in of the planning application. The site is designated open countryside under the Local Plan and the NDP. This is in order to protect its open nature from any sort of development. The NDP upheld the designation as open countryside. There are concerns over the visual impact, the effect on local residents, and the scale and landmark design of the proposal. Planning decisions should follow the rules and the development plans should be upheld.
211. *Simon Watson*, in objection. The proposal will drain into a new drain installed as part of the Broughton Bypass construction. Further to matters which arose out of the construction of that drain, it has not been designed to the specification stated, and does not meet the 1 in 100 year design capacity. The drain enters the Blundell Brook. The brook levels are regularly above the top of that non-return valve and flooded some properties, as well as the bypass. The drain has not been surveyed, after it was reinstalled. There has been little or no questioning of drainage, and the City Council rely on consultee replies. An alternative solution might be to connect to a public sewer just beyond the motorway roundabout. The proposal would also be directly blocking properties line of site to Winter Hill creating a telecommunication shadow with regard to television and mobile signals, and extensive mitigation should be incorporated. The turning head **along D'Urton Lane**, where the proposed access would be, is regularly obstructed including by Heavy Goods Vehicles. There has also been a lack of respect for the local community with regard to the use of the turning head. Permits for residents parking and an alternative access should be incorporated, leaving the turning head to act as intended as a lightly accessed

- agricultural entrance. Double yellow lines would cause residents further issues. (ID6)
212. *Dr Peter Bunting*, in objection. It is accepted that there is a need for a mosque, but this is the wrong site. Visually, the site is open countryside and acts as a separation which should remain. The M55 acts as a natural barrier and protects the village from overdevelopment. Highway safety concerns would arise. There should have been local representation on the RIBA panel and the design is not acceptable. There are better sites in north Preston.
213. *Mike Booth*, in objection. It is the wrong location with regard to traffic and parking, heritage, need and the NDP. It is agreed that there is a need, but not in Broughton and it will result in congestion and gridlock. There will also be visibility resulting from the height of the minaret. That the applicant has bought the site is not a consideration.
214. *Sumaiya Moreea*, in support. Has to travel into the centre of Preston at present to a mosque. The proposal will act as a base for community work, which Broughton lacks. Users will be able to walk or cycle to it. It is ideally located for 300 plus Muslim families.
215. *Les Brown*, in objection. The listed church is of historical value and contains graves for servicemen. The NDP has allowed local people to have a say in the development plan. The size, scale and location would be apparent over the whole Parish, overshadow the church hamlet and dominate the skyline. It would cause traffic and parking on nearby roads. The brook cannot handle drainage and the bypass floods. There is no demand in the Parish for the proposal, and a village hall and allotments are more important.
216. *Tina Murtza*, in support. It is important to have separate facilities from those in Preston, as worshippers are having to cross the city centre at present to access suitable facilities. The proposal will be walkable for local Muslim residents and there are bus links close-by. The mosque will be used for more than just prayer, it will offer support groups and classes, including for new Muslims, and support friendships. There is a need for the Muslim community and there will be open days for the wider community. **D'Urton Lane** is already used for car parking for car sharers, as well as the school and there have been no particular issues.
217. *Fatima Ismail*, in support. There are more than 300 Muslim families in the vicinity and there is a lack of a local place of worship. Members of the Muslim youth scout group are also local. This includes girls and now allows for those in Broughton to join up. The proposal would provide a venue. It would also provide recreational and spiritual classes and so benefit mental health. It could also be a visual attraction.
218. *Muhammed Javid*, in support. There is a need for the proposal, as there is a larger Muslim community in the area, including Broughton. Traffic would occur at the times of day when the roads would be less busy due to when prayers would be held at the mosque. If it is not provided, users will have to travel elsewhere and create more traffic.
219. *Vali Patel*, in support. Residents are looking for a better life and so have moved into north Preston and so there are greater numbers needing a mosque as the population grows. The City Council should have been allowed to decide on the application. The mosque will not exacerbate problems in the area. With regard

- to traffic, users have to travel currently to a mosque 2½ miles away². In architectural terms, it is reminiscent of the RAC building and the minaret will be an icon for Preston, like the bus station. It will be good for the community and cooperation.
220. *Zuber Isap*, in support. Query why the application has been called in, given the type of development. There is no objection from a neighbouring gated housing development. It is out of the way and close to the bypass, and not in the village. It is within easy reach of north and east Preston, as well as the M55 in relation to stopping off from prayer. It is a wasteland at the end of a road. It is ideally located for Muslim families who have nowhere to worship. There are over 300 Muslim households, and a third of Storey Homes residential development in north Preston are Muslim households. Prayer times are when there would be less traffic and it would not affect the village. It will not compete with the church, as it would be separated from it by James Towers Way and it will serve different communities.
221. *Gordon Hayward*, in objection. Attendees would increase traffic at a busy road junction, with effects on emergency services and accidents. The proposal is unsuitable and visitors would express disbelief at it.
222. *Scott Sergeant*, in objection. Traffic already results from the new homes being built and on **the D'Urton Lane link**. The bypass can already back up, with traffic then utilising the village, causing queues. There are already more houses on **D'Urton Lane** and traffic drives down this cul-de-sac then having to turn around. This has been observed, as a user of the lane. **D'Urton Lane** does not permit 2 way/through traffic.
223. *Dr Afzal*, in support. The Fulwood foodbank is currently based at a mosque, showing the importance of foundation and fellowship. The proposal would provide space for the community and an opportunity to bring people together, as well as a legacy and a place for faith leaders to meet.
224. *Seema Bux*, in support. Scouts would benefit with growing numbers from this area of Preston and for those who cannot access places of worship and education. It would be a stopping place on the Guild Wheel and scout groups would want to be taken to the proposal. It is for all faiths.
225. *Shoayb Bux*, in support. With the Covid-19 pandemic, mosques became a place of sanctuary in the community. The site is left over land from the bypass construction. Many Muslims would benefit from the location.
226. *Khalid Ibrahim*, in support. With regard to traffic, drainage and effects on neighbours, Islam respects the rights of neighbours, irrespective. It will be of value to the local community, and residents will use the facility.
227. *Jamel Murtza*, in support. It is fair that people have somewhere to worship. In policing terms, mosques cause the least issues. Change is not something to be afraid of. With regard to need, 1100 houses have been built in north Preston.

² Majid e Salaam Mosque, Watling Street Road, Preston PR2 8EA

228. *Mr Bapu*, in support. It will not be just a place of worship. It will be a safe house, amongst other functions. In certain situations, policies must be set aside and this is the right thing to do, including where there are hundreds of new homes and so therefore potential worshippers.
229. *Mr Khazi*, in support. **It will embrace diversity and 'level up'** where families are moving in and will contribute to the area. In heritage terms, it will compliment the area and users will carry out domestic functions at home, with regard to the effect on drainage. Sustainability and carbon footprint will be addressed, and this has been less of an issue when other buildings have been considered through planning in the area. It will preserve the quality of life and walkers will appreciate it.
230. *Mr Zinga*, in support. There is need for a place of prayer and gathering, including with regard to the number of houses in the area and Muslim families along **D'Urton Lane. There are also wider** community benefits associated with mosques, such as foodbanks and community work. In terms of the location, the City Council has decided that it is acceptable.
231. *Dr Ahmed*, in support. It will help doctors and families to worship and as it will avoid peak hours, it would not be in conflict in this regard. It will also help scout groups.
232. *Mr Horne*. Raised matters in relation to scout group usage, security with regard to refuge and cyberattacks, investment, the best interests of users and residents, water, use of renewable energy sources, heat pumps, car park run-off and traffic.

Written Representations

233. A significant number of representations were made on the application when it was with the City Council, and more were made as part of the consultation process that closed prior to the inquiry. Many of the points raised in those representations are also contained in the cases of the main parties and those interested parties who spoke at the inquiry.

Interested Parties – In Objection

234. A summary of the representation of the RT Hon Ben Wallace MP is as follows:
- **The level of traffic using D'Urton Lane, a narrow residential lane;**
 - Impact on the Guild Wheel cycle route;
 - The visual impact of the new building;
 - Impact of **the new building on the nearby listed St John's Church;**
 - The site is located within open countryside, so the application is contrary to the policies of the Local Plan.
235. A summary of the remainder of the representations is as follows:
- Highway Safety: Congestion on the local and strategic highway network, car and cycle parking, turning, cycle and pedestrian safety/Guild Wheel, usage, distraction, insufficient public transport, and cumulative effects with primary school and other development.

- Open Countryside: Loss of, not comply with development plan requirements, no exceptions should be made, inappropriate and unsustainable location, and encroachment of the city boundary into a rural location.
- Character and Appearance: Effect on rural character, dominant design, the effect on the skyline and entrance to Preston, scale and on elevated land, visual impact, over development and a lack of screening.
- Heritage: Effect on Broughton St John Baptist Church, graveyard, Church Cottage and the Primary School.
- Living Conditions: Noise, overlooking, outlook and visual impact, privacy, air quality and litter.
- Other: Lack of electric vehicle charging points, loss of agricultural land, flooding and drainage, need in location and who will benefit, effect on ecology, potential for alternative uses of the site, will increase social tension and better other locations.

Interested Parties - In Support

236. A summary of these representations is as follows:

- Need: Will serve the need of local people and a growing population, and other mosques are at full capacity.
- Community Facility: A source of community integration, will create a stronger sense of community spirit and part of a neighbourhood watch programme.
- Character and Appearance: Attractive building and has been the subject of a RIBA competition.
- Highway Safety: A lack of through traffic, substantial car park, will reduce traffic elsewhere, highly accessible as close to bypass and M55, congestion no worse than housing and the Guild Wheel will encourage users to cycle.
- Other: The existing site is of little benefit as open countryside and agricultural land, economic activity and employment, less emissions due to travel time and precedent elsewhere

Consultee Responses

237. The most up to date position of internal City Council and external consultees in relation to the planning application consultations that the City Council carried out is set out below, in summary. (CD D1 to D29)

238. *Parish Council:* Object for a number of reasons as it is wholly inappropriate for the proposed site and is not in the interests of the Broughton community. The reasons concern the NDP, a documented lack of need, excessive traffic and noise mitigation, overdevelopment of the site, Broughton community, supplemental guidance, integration, financial benefit, external sahn, hours of opening, air quality, heritage, scale, drainage, factual inaccuracies in paperwork, information access, Core Strategy, escalation and the public benefit statement. Also

responded on the need for the proposed development and the impact on the Parish Church hamlet.

239. *LCC (Highway Authority)*: On receipt of a Transport Assessment, Car Park Management Plan and a Technical Note, no objection to the proposal subject to the applicant being agreeable to a Section 106 obligation concerning the use of the site during Friday Jumrah Prayer, the Car Park Management Plan and the delivery of the proposed double yellow lines, and conditions.
240. *National Highways*: Following the submission of a Glint and Glare Survey and amended plans, no objections raised subject to conditions.
241. *Historic England*: Do not wish to offer comments.
242. *Friends of the Guild Wheel*: Concerns have been addressed, following a request for a 3m wide two-way segregated shared footway/cycleway that runs the full length of the cul-de-sac, from the existing segregated shared footway/cycleway **on D'Urton Lane to the crossing at James Towers Way**. This should be at a raised level along its full length and have priority at both the entrance to the proposed new car park and the entrance to the recent housing development.
243. *CPRE*: Objection on the grounds of tackling climate change, design, effect on the historic environment, flooding, highway safety, rural character and appearance, biodiversity, conflict with development plan policy, the open countryside, areas of separation and cumulative effects.
244. *Lead Local Flood Authority*: No objections subject to conditions.
245. *United Utilities*: Acceptable in principle. As not sufficient detail of the drainage design, request conditions.
246. *City Council (Environmental Health)*: Recommend condition as part of the approval if granted.
247. *City Council (Waste Management)*: The swept path provided is acceptable.
248. *Greater Manchester Ecology Unit*: No objection and no further surveys required. Recommendations over trees, vegetation clearance and landscaping.
249. *Growth Lancashire*: Refer to the Section 66(1) Duty stating that it will be down to the Local Planning Authority to consider whether the benefits generated by the development outweigh the negligible level of harm caused to the significance of the Church.

Planning Conditions

250. A schedule of planning conditions was drawn up by the City Council and the applicant prior to the inquiry. The Parish Council have also made comments on the conditions schedule. A revised condition 6 to incorporate foul water drainage was also submitted by the City Council during the course of the inquiry. The discussion at the related round table session (RTS) proceeded on this basis. I have also considered the suggested conditions in light of paragraph 56 of the Framework, which states that conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. (CD B13, J11, ID24)

251. The conditions that I recommend to the Secretary of State are set out in Annex Three, if planning permission is to be granted. The numbering does not entirely accord with that within the aforementioned schedule as some conditions have not been recommended. For the avoidance of doubt the condition numbers used in the below concur with those in Annex Three.
252. Conditions 1 to 3 concern the statutory time limit and the reserved matter, landscaping. In the interests of certainty, condition 4 concerns the approved plans for the proposal. Condition 5 relates to a landscaping and an ecological enhancement plan. This is in the interests of both character and appearance, and biodiversity. Biodiversity net gain is incorporated following the discussion at the RTS, in accordance with Section 15 of the Framework. While the applicant submitted an illustrative public realm plan, the reserved matter should not be bound by such a plan as it is illustrative. I have considered it on this basis.
253. A condition concerning hours of opening is not necessary and reasonable as the proposal relates to a place of worship. Matters in relation to noise associated with the proposal are covered by separate conditions. Condition 6 involves a drainage strategy, in the interests of providing satisfactory drainage and minimising flooding. It incorporates both surface and foul water drainage arrangements. Condition 7 relates to a construction surface water management plan, also in the interests of minimising flood risk. Reference to consultation on the details to be submitted is not necessary, as this is for the Local Planning Authority to decide as the body that will ultimately discharge the condition. The same also applies in subsequent conditions, where acceptance by consultees was also referred to in the schedule.
254. Condition 8 concerns the means of enclosure. This is in the interests of highway safety, and character and appearance. Condition 9 deals with a construction plan working method statement, also in the interests of highway safety, whilst condition 10 relates to a construction environmental management plan that is applied in the interests of highway safety and living conditions. It provides for hours of working to be agreed first with the Local Planning Authority, so exact hours do not need to be included.
255. Condition 11 involves levels details, in the interests of character and appearance. Specifying details of the heights of the proposal is not necessary as this is already shown on the submitted elevational drawings that would be read with the levels details. Condition 12 concerns energy efficiency, in the interests of combating climate change. It relates to the standard under Core Strategy Policy 27 as regards the BREEAM rating and so is reasonable and necessary.
256. Condition 13 concerns off-site highway works within the parameter of the details already submitted, for the reason of highway safety. Prior to first occupation of the proposal is a reasonable trigger for implementation as these works relate to dealing with highway matters that arise at that stage. Condition 14 deals with tree protection, in the interests of protecting the amenity value of trees. In order to ensure existing trees and hedges are protected, the details require to be submitted before construction begins and the wording has been adjusted accordingly. The condition does not need to be any more exact, as the Local Planning Authority will deal with those details in discharge of the condition.
257. Condition 15 and 16 refer to the management and maintenance of the sustainable drainage system, in the interests of minimising flood risk for the

lifetime of the development. Condition 17 concerns a car park barrier, in the interests of highway safety, whilst condition 18 requires the provision of electric car charging points, in the interests of combating climate change. At least four such points is reasonable and necessary with regard to provision, and which the City Council stated at the RTS was related to the development plan. Condition 19 concerns the external materials, in the interests of design quality, and character and appearance.

258. Condition 20 relates to car parking as proposed, in the interests of highway safety, and Condition 21 concerns cycle parking, in the interests of promoting non-car modes of transport. There is no policy requirement for the cycle parking to be covered or secured. Condition 22, and 23 further concern drainage, in the interests of providing satisfactory drainage and minimising flooding. I have not included conditions which duplicate requirements for separate surface and foul water systems, and concern no works on National Highways land because no such works are proposed, as the applicant informed at the inquiry.
259. Condition 24 concerns external lighting matters in relation to the operation of the motorway, in the interests of highway safety and living conditions. It is reasonable and necessary for this condition also to include all other forms of external lighting (if any) to be provided with subsequent landscaping reserved matters. Condition 25 deals with unexpected land contamination, in the interests of protecting public health.
260. Conditions 26 and 27 concern matters related to the control of noise, in the interests of protecting living conditions. It is not reasonable and necessary to expand the remit of condition 28 to cover other external announcements apart from no call to prayer, because the condition already prevents external speakers being installed.
261. Condition 28 concerns the use of the proposal as a mosque. There was broad agreement at the RTS that such a condition was reasonable and necessary. The particular case that has been put forward specifically relates to a mosque use, and not any other use within Use Class F1, as were the effects that were the subject of evidence at the inquiry. This condition would not prevent ancillary uses to the mosque use that are community related. A condition concerning archaeological remains would not be reasonable and necessary, as there is not substantive evidence on the likelihood that the site would hold such remains, in particular with its former use as a construction compound.

Planning Obligations

262. The obligations in the Section 106 Agreement bind the owner to covenants with the City Council. The obligations relate to car parking management concerning the Jumah (Friday) Prayer and a travel plan. The Parish Council also commented on the draft Section 106 Agreement that was the subject of a round table session at the inquiry. The final version of the Section 106 Agreement was submitted a short time after the inquiry had closed. (CD B14, J12, ID32)
263. With regard to car parking management planning obligations, 2 separate Jumah Prayer services would be held on the same day (Friday). Arrangements are also

put in place for the timings of the respective prayer services, so that there shall not be less than 45 minutes between the start of the respective prayer services, and timings with any Asar Prayer³.

264. The obligations also provide for a minimum 150 marked car parking spaces comprising a minimum 77 spaces for car sharing, 12 mobility spaces, 47 standard spaces, 10 VIP/staff spaces and 4 electric vehicle charging spaces in the car park for those attending Jumah Prayer. No more than 248 adults are to worship on the ground floor of the building and only in the Prayer Area. No other activities are to take place at the same time as Jumah Prayer from 20 minutes before the start of the first service and until the end of the second service. No adults are to worship on the first floor of the building for Jumah Prayer unless they are prevented from worshipping on the ground floor for spiritual or cultural reasons. *(ID 32 The Schedule 1.1-1.7)*
265. At least 3 stewards who have full knowledge of the obligations are to be present on site at least 20 minutes before the start of the first service and until the start of the second service. During Jumah Prayer, all vehicles are to be parked in the car parking spaces and none are to be parked outside of these spaces. All occupied spaces must be booked in advance via an on-line booking system and no vehicle will be permitted entry if confirmation of the booking cannot be provided. An associated Automatic Number Plate Recognition System must also be provided. No person will be permitted entry if their vehicle is parked on the **length of D'Urton Lane within the Visibility from the Site Entrance**, which is defined as near the entire length of the **D'Urton Lane** cul-de-sac. *(ID 32 The Schedule 2-6 & Plan 4)*
266. The obligations also include a Travel Plan which comprises a package of measures aimed at promoting sustainable travel in connection with the proposal, both to and from the site. This has an emphasis on reducing single car occupancy through the use of a Travel Plan Coordinator to further the aims of the Travel Plan, annual targets for reducing single car occupancy for travel and monitoring, modifications of the targets and consequences for not meeting the targets. Travel surveys are also to be carried out in relation to the occupation of the spaces and correlation with the booking system. Time periods are also set for review and the timings of the travel surveys. The Travel Plan is to be submitted and approved in writing by the City Council before the development is to be used. *(ID 32 Operative Provisions 1.1 & The Schedule 7 to 8)*
267. **According to the City Council's Compliance Statement**, the car park management plan obligation would provide sufficient measures to control the use of the car park in accordance with Policies 3 of the Core Strategy and ST2 of the Local Plan, **in order to prevent issues with parking along D'Urton Lane**. The Travel Plan is said to provide a safe and suitable means of access to the site, and make walking and cycling an attractive and realistic choice. The obligation is thereby said to encourage more sustainable forms of transport and reduce the need to travel by car, in accordance with the Framework. *(ID 27)*
268. The Community Infrastructure Levy Regulations (as amended, 2019) (CIL Regulations) require that any planning obligation must be necessary to make the

³ The published time at which any prayers are to be held on Fridays

development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. These are the same tests as set out in the Framework. The S106 agreement is fit for purpose and can be relied on to deliver its commitments. Whether it would meet the tests is a consideration in my conclusions as it closely relates to highway safety and encouraging non-car modes of transport.

Inspector's Conclusions

Introduction

269. I have used references in square brackets to cross refer to earlier paragraphs in the report which are of relevance to my conclusions. This includes dealing with the substantive points that the parties have raised in evidence, both for and against the proposal, in order to inform the Secretary of State.
270. The proposal comprises a mosque with ancillary facilities including parking and access. The site is not currently in use, but was last in use as a construction compound for the nearby A6 Broughton bypass (James Towers Way) and much of its planning history relates to this previous use. Since the previous use, a large proportion of the site has been taken over by ruderal vegetation. There is also not an insignificant amount of trees and vegetation around parts of its boundaries.
271. The track from the site access **from D'Urton Lane** leads up to an area of loose stone on the site. The site is elevated **over D'Urton Lane**, James Towers Way and the M55/A6 junction roundabout, which is found directly to the south-west. **D'Urton Lane consists of occasional development, interspersed with open land.** Beyond James Towers Way, lies the Blundell Brook and then a cluster of listed buildings, including the Church of St John the Baptist.
272. My conclusions are structured to reflect the matters on which the Secretary of State particularly wished to be informed for the purpose of his consideration of the application, namely *a) The extent to which the proposed development is consistent with the development plan for the area.* With regard to *b) any other matters the Inspector considers relevant*, I found these to be the following, based on a review of the submissions and the Case Management Conference (CMC) that was held on 31 May 2022:
- the effect on the significance of designated heritage assets, in particular the Church of St John the Baptist, Broughton C of E Primary School and the Church Cottage Museum;
 - the effect on highway safety by way of traffic generation, car parking and the Guild Wheel cycling and walking route;
 - the design quality of the proposed development;
 - the effect on the character and appearance of the area, including the countryside and Broughton village; and
 - planning balance including need and the benefits of the scheme, as well as drainage and other considerations, and the conclusion.

First though, there is need to address whether the site constitutes previously developed land for the purposes of the definition that is set out in the Glossary of the Framework.

Whether the site is previously developed land

273. There was much evidence at the inquiry on this matter because on the one hand, the applicant considers that the site constitutes previously developed land, whereas the City Council take a different view. The Parish Council has also referred to **the City Council's position on this matter**. Policy 1 of the Core Strategy refers to focusing growth and investment on well located brownfield sites, while also setting out that some Greenfield development will be required on the fringes of the main urban areas. In addition, chapters 6 and 11 of the Framework encourage the use of previously developed land, although not precluding the use of land which is not previously developed. [18, 36, 78, 132, 170]
274. The applicant makes the point that the site is artificial. The applicant is correct in the sense that land in the area has substantially changed due to the construction of the bypass and the formation of the site as the construction compound for these works, including associated reprofiling. This has resulted in a substantial change and there is no sign now of the development that was cleared to make way for the works, including the 3 dwellings and land that is understood to have been used for grazing. In terms of the construction compound works themselves, I was referred at the inquiry to a tarmac car park over aggregate and storage containers on a level platform that was served by the accessway off **D'Urton Lane**. I was also referred to the infilling of voids and that the landscaping for the bypass also has a limited effect on the site, save for two modest narrow areas alongside the accessway. [73, 74, 76]
275. Apart from where the approved landscaping for the bypass impacts on a small portion of the site, there is also not substantive evidence that restoration post-construction was a particular facet of what was approved, based on the planning history of the site. [41, 42, 77]
276. That being said, it was evident from my site visit that there have been significant changes on the site since it was in use as a construction compound. The tarmac is no longer in place apart from at **the D'Urton Lane access and there is no sign of storage containers**. There are still signs of aggregate, but this is only appreciably noticeable on the track and where it opens up into what is a fairly modest sized area within the site. Elsewhere, and covering the vast majority of the site, is now the ruderal vegetation. There are also the not insignificant levels of trees and vegetation on the boundaries with the M55 and **M55/A6 roundabout, D'Urton Lane** and along the boundaries with houses to the east.
277. The applicant considers there is underlying aggregate and this has given rise to the uneven nature of the site. Even if that is accepted to be the case, it has been taken over by the ruderal vegetation and so there are limited noticeable signs of the aggregate in this regard. [77]
278. The definition of previously developed land under the Framework first refers to "*Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface*". **Despite the**

absence of formal site restoration, a construction compound is a temporary use because it relates to the provision of a development, rather than being a permanent development in its own right. Rather this land was last occupied permanently in conjunction with the 3 dwellings and grazing, and so it is that use which attracts merit in applying the definition to the site itself, despite the considerable subsequent changes on the site and in the area due to the bypass. [36]

279. The definition includes a number of exceptions, and the City Council has pointed to "*land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.*" On the basis that there are no signs of any permanent structure or fixed surface structure associated with the dwellings and grazing, this exception applies. If the Secretary of State is of the view that the construction compound should be **considered 'permanent' in the absence of** formal site restoration, then this exception should still apply because the site has largely been taken over by ruderal vegetation so that it does blend back into the landscape. [132]
280. The applicant considers that if the site is found not to be previously developed land that it could set a precedent for brownfield sites that become overgrown. However, such a consideration depends on the particular site circumstances and so would not easily be replicated from one site to another. The Secretary of State can thus be content that no such precedent would be set if the site is found not to be previously developed. [79]
281. In conclusion, I consider that the site would not meet the definition of previously developed land under the Glossary to the Framework and so would not attract support from Policy 1 where it refers to focusing growth and investment on well located brownfield sites. It would also not attract support from where the Framework encourages the use of previously developed land. If the Secretary of State takes a different view, then the proposal would attract support from Policy 1 and the Framework in this regard.

The extent to which the proposed development is consistent with the development plan for the area

282. I focus my considerations here on policies that concern the spatial strategy, as they have a large bearing on whether the proposal would be contrary to the development plan as a whole, and so the extent to which the proposed development is consistent with the development plan for the area. I deal with other relevant policies in the development plan in the later considerations, before then coming to an overall conclusion.
283. It is not a particular matter of dispute between the main parties that the proposal would not comply with Policy 1 of the Core Strategy and Policy EN1 of the Local Plan. The SoCG between the applicant and the City Council states **that** "*The development does not accord with Core Strategy Policy 1(f) and Preston Local Plan Policy EN1.*" The applicant however places some emphasis on the provisions of Policy AD1(a) of the Local Plan and how this interacts with the application of Policy EN1. [B15 paragraph 23, 106, 132, 173]
284. Policy 1 forms the spatial strategy for the plan area and apportions development on a hierarchical basis. The site falls to be considered on the lowest rung of the hierarchy, as '(f) In other places'. The types of development that are stated

- under (f) are typically small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional reasons for larger scale redevelopment schemes. The proposal does not fall into any of these types of development. [18]
285. Under the Local Plan Policies Map, the site falls within open countryside. It lies well outside of the defined settlement limit of Broughton which lies some distance to the north. Under Policy EN1, again, development is limited to defined types and which the proposal does not fall into. The applicant has sought to contend that Policy EN1 does not expressly prohibit the development of the site. That is true, but it is limited to the types of development which the policy sets out. Development not within its terms would not accord with the policy. [26, 30, 105, 234]
286. Citing the location of the site, the applicant has also referred to where Policy AD1(a) permits development within or in close proximity to the Existing Residential Area. On the Local Plan Policies Map and Key, the nearest such area lies on the opposite side (south) of the M55. **The properties along D'Urton Lane** do not fall within such an area. **There is no definition of 'close proximity' under the policy.** In this instance, it is separated by major highway infrastructure associated with part of the strategic road network, the M55 and the M55/A6 motorway junction. Within this context, I find that Policy AD1(a) does not factor when considering the proposal. [24, 106 to 108]
287. Even if the proposal would be considered to be in close proximity to the Existing Residential Area, Policy AD1(a) does not have a bearing on the operation of Policy EN1. Neither policy EN1 or AD1(a) makes reference to the other and so they are to be applied independently, notwithstanding that the applicant takes a different position. The proposal would conflict with Policy EN1, regardless of Policy AD1(a). [108]
288. In the event that the Secretary of State disagrees and finds the proposal in close proximity to the Existing Residential Area, the criteria of the policy would then need to be applied so as to decide on whether the proposal would be in accordance. These concern character and appearance, living conditions and highway safety related matters, and so the remaining considerations that I set out would be of relevance as to whether the proposal would then comply with this policy.
289. Policies 19 of the Core Strategy and EN4 of the Local Plan have a spatial element to them because they seek to maintain the openness of the countryside and ensure that settlements do not merge and are kept distinct. Policy 19 provides for areas of separation to be provided, and this has been achieved in the plan area by way of Policy EN4 which specifically designates areas of separation. The designated area of separation on the Policies Map between Preston and Broughton, whilst located in the vicinity of the site, is found on the opposite side of James Towers Way. It expressly does not include the site. [20, 27]
290. There is nothing to suggest in Policy EN4 that it is to be applied outside of the designated areas of separation. If it did, it would seem to render the designation of these areas somewhat inconsequential. It should not reasonably be inferred, or read into the policy, that by virtue of the proximity of the Area of Separation, that it has some bearing on the site. Neither Policy 19 nor Policy EN4 applies in this case and so the proposal is not in conflict with these policies. [104, 134]

291. Policy NE1 of the NDP designates green spaces. On similar lines to the above, whilst these areas are in proximity to the site, in particular the land between Blundell Brook and the bypass, the site lies outside of this designation and so it does not apply. Policy NE2 of the NDP has a spatial aspect to it, where it refers to the visual impact of new development, particularly that on the 'edge' of the defined settlement of Broughton. This 'edge', however, lies some distance from the site as the settlement boundary reflects the concentration of the built form in the village that is well to the north. The site is not thus on the 'edge' of the defined settlement and so this part of Policy NE2 also does not apply. [30, 31, 32, 136]
292. In conclusion, Policies 1 and EN1 are central to the spatial strategy of the development plan and there would be conflict between the proposal and these policies. Accordingly, I agree in particular with the position of the City Council and the Parish Council that the proposal would be contrary to the development plan as a whole, notwithstanding that I have not found conflict with NDP policies that have a spatial element to them. [132, 173]
293. Still, this does not mean in itself that there is no support from the policies in the development plan for the proposal. Nor does it mean that there may also not be further conflict with those policies. I explore these matters in the considerations that follow.

The effect on the significance of designated heritage assets, in particular the Church of St John the Baptist, Broughton C of E Primary School and the Church Cottage Museum

Church of St John the Baptist

294. The Church of St John the Baptist is a Grade II* listed building. It is the Parish Church, of a sandstone construction and dates from the 16th century. It contains a 3 stage tower which rises to a height of 18.5m, beyond which is the 19th century nave, and then the later chancel and offices. The various phases of its construction give rise to its architectural interest and value.
295. Whilst it is located now some distance from the centre of Broughton village, it derives significance as a landmark within this part of the Parish, albeit tempered by its height, that it is relatively well enclosed by tree coverage and as it sits on lower land close to the Blundell Brook.
296. The setting of the Church relates to local views, where it can be appreciated in respect of the dispersed pattern of development and open land in what once would have been a more intact rural hinterland. This includes the application site. A linear view is also formed down Church Lane (from Garstang Road) towards the Church tower. There is not though a distinct linear view towards the site, due to the presence of tree coverage and James Towers Way. The Church is also clearly experienced in its immediate vicinity from its associated graveyard. It is these elements which make up the setting of the heritage asset for the purposes of the definition under the Glossary to the Framework. [36]
297. It is not in dispute between the main parties that harm would arise to the setting of the Church as a result of the proposal. There is agreement that 'less than substantial harm' **would occur** to the significance of this designated heritage asset, for the purposes of paragraph 202 of the Framework. Nonetheless, there is disagreement over the level of effect and the attribution of weight. The City

Council considers the effect would be 'negligible' and the applicant 'limited', whilst the Parish Council find a 'medium' level of less than substantial harm. Both the City and Parish Council points to 'great' weight to the harm that would arise, while the applicant's **position** is 'moderate' weight. Some interested parties also consider there would be a visual impact on the church (118-120, 144, CD J5 paragraph 6.3, 234)

298. There would be some disruption to the setting of the Church because the proposal would involve building on open land that once formed part of the rural hinterland of the church, with regard to its historical and functional association. The proposal would involve a building of not insignificant size and scale. Nevertheless, the setting has already been markedly altered by the construction of James Towers Way that dissects the land between the Church and the site. The effect that this major element of road infrastructure has had on the setting of the Church is not to be downplayed, and this is consistent with findings of the Bypass Report itself to the Secretary of State for Transport. (142)
299. In relation to visual effects, there would also be a distinct sense of separation. Not only would the Church and the site be separated by James Towers Way, but by other open land in between, tree coverage, the school car park and the works associated with the construction of the bypass.
300. Nor would designated views be affected, including any of the views which General Policy HE of the NDP considers to have significance. There would be some visibility of the proposed minaret and the Church together from the north-east, **as is shown in the applicant's Panorama 1**. The minaret would be seen as a higher structure and on elevated land. However, this panorama is taken some distance in particular from the site and it also demonstrates the separation and degree of tree coverage around the church, compared to its height. Whilst not **provided to the same exact methodology, the Parish Council's viewpoint** (Figure 1) taken from the north-east along James Towers Way illustrates a similar point. [34, 120, CD J7]
301. Closer to the site, the Church and the proposal would be in view along Garstang Road, although divergent in their presence (Panorama 2, Figure 4). At the junction of Garstang Road and James Towers Way, the proposal would be prominent in view but again divergent in view from the Church. Moreover, the highways infrastructure at the James Towers Way and Garstang Road junction would be prominent in the foreground (Panorama 3, Figure 2) [CD H8, J7]
302. The Heritage and Character Assessment that was commissioned for the NDP was aware of the bypass construction. Yet, this does not take my consideration much further on the effect of the setting on the Church. The removal of trees for James Towers Way would have opened up additional views, but such views are drawn to the bypass itself, rather than the Church with the site. Overall, I find the effect on the significance of the Church would be at the lower end of the scale of less than substantial harm. [177]
303. The disagreement over the weight to be attached to the harm stems from the application of where paragraph 199 of the Framework states that "*When considering the impact of a proposed development on the significance of a designated heritage asset, great **weight should be given to the asset's conservation** (and the more important the asset, the greater the weight should be).*" It is not in dispute that great weight must be given to the duty under

Section 66(1) of the LBCA Act, but rather there is a dispute over the weight that falls to be attributed to the particular harm. Based on the *Bramshill Court of Appeal* judgment, paragraph 199⁴ “*does not predetermine the appropriate amount of weight to be given to the “conservation” of the heritage asset in a particular case. Resolving that question is left to the decision-maker as a matter of planning judgment on the facts of the case”* (118, CD G7 paragraph 73)

304. I have given great weight to the statutory duty. In applying the facts of this case, the Church is a grade II* building and so even though the level of harm would be limited, I still find that great weight should be attributed to that particular harm. It will be for the Secretary of State to decide on the statutory duty and over the weight to be given to the particular harm, as per the Bramshill Court of Appeal judgment.

Broughton C of E Primary School

305. The school is a single storey sandstone and slate building which dates from the 19th century. It faces the church and is separated from it by Church Lane. It is Grade II listed. It is in a Jacobean style and has been extended, and new classrooms have been erected. Its significance derives from that it represents an educational building and learning from that era in relation to its cultural value, as well as its obvious association with the Church as a Church of England school. The more modern school car park is physically separate.

306. The site lies well beyond what can be reasonably considered the setting of the school, given the intervening distance, the Church, the school car park and James Towers Way, as well as the tree coverage. It would also be effectively screened from the site. On its own, there is no apparent historical connection. Hence, no harm would arise to the significance of the school.

Church Cottage Museum

307. The museum is a brick building with a steeply pitched roof. It is part 2 storey and part 1½ storey. It is Grade II listed and lies next to the church and school. The listing description dates it from the 19th century, although there is some evidence that it may be earlier. It has had a variety of uses, including as a school house, a public house and home to the sextons, as well as a museum. Its significance is derived from its construction, as well as connections to the school and church.

308. Again, the site lies well beyond what can reasonably be considered the setting of the museum. It is too remote from it and there is no apparent historical linkage. No harm would arise to the significance of the museum.

Other Listed Buildings

309. The Parish Council also raised concerns in evidence with regard to a Sundial, Mounting Block and the Village Stocks. They are all Grade II listed and lie within the grounds of the Church, or adjacent to it.

⁴ Paragraph 193 of the version of the Framework that was in place at the time of the Judgment

310. They are diminutive structures and their significance derives from their location in relation to the buildings around them, and as part of the function of this modest cluster of buildings. There is no obvious connection to the site and they would be screened from it, especially with their modest scale. No harm would arise to the significance of these structures.

Grouping

311. All of the listed buildings above form part of what is historically known as the Broughton hamlet, notwithstanding more modern definitions of this term. They have group value as a 'cluster' and in providing a number of village functions, and so have historical and communal significance in this regard. The cluster is centred on the Church as the more dominant building. The Heritage and Character Assessment identifies the grouping as sensitive, but as they are listed buildings this is perhaps unsurprising. However, this grouping can still be appreciated as the original village core. [180]
312. Where they are experienced as a group is when the viewer is located close to them, including on Church Lane and in the grounds of the Church itself. The setting contributes to their significance through the relationship of the buildings to each other as this is how the grouping is appreciated. They form an attractive cluster of buildings. However, this does not stretch into the area beyond, apart from Church Lane and the Glebe Field. [179]
313. The setting of the Church should not be confused with the grouping. As I have set out above, the setting of the Church does include the site. The setting of the grouping does not because it reflects the historical relationship between the buildings themselves, rather than large areas of land beyond, i.e. it is how these buildings relate to one another. No harm would therefore arise to the significance of the group of listed buildings from the proposal.
314. The grouping is not a conservation area and whilst it has been stated in evidence that it is worthy of such a designation, it was also confirmed that the designation has not been taken forward in light of protection afforded by the existing listings. [ID12]

Conclusion

315. Taking account of the above, as a degree of harm would arise, the proposal would have an unacceptable effect on the significance of a designated heritage asset, the Church of St John the Baptist. As such, it would not comply in this regard with Policies 16 and 17 of the Core Strategy and with Policy EN8 of the Local Plan where they afford protection to the historic environment, as regards this asset, as well as with General Policy HE of the NDP in relation to the general protection that it applies.
316. The proposal would not though have an unacceptable effect on the significance of other designated heritage assets, namely the Broughton C of E Primary School, the Church Cottage Museum, the Sundial, Mounting Block and the Village Stocks, as well as the grouping of listed buildings. As regards these assets, the proposal would accord in this regard with Policies 16 and 17, Policy EN8 and General Policy HE. I have also paid special regard to the desirability of preserving listed buildings or their setting under Section 66(1) of the LBCA Act.

The effect on Highway Safety by way of Traffic Generation, Car Parking and the Guild Wheel Cycling and Walking Route

Traffic Generation

317. Where there is a dispute over traffic generation between the main parties is over the effect on **the D'Urton Lane** cul-de-sac, and not the general highway network. The cul-de sac, or spur of **D'Urton Lane**, is the part from where it joins a further **stretch of D'Urton Lane** at a junction to the east to where it becomes a dead-end to the west, in front of the site and close to James Towers Way. National Highways and LCC, as the local highway authority, have not raised concerns over the effect on the broader network, subject to conditions. [126, 184, 239, 240]
318. The transport assessment was based on traffic generation related to 150 car parking spaces and 248 prayer mats, as this was intended to give an indication of the usage of the proposal. Conceivably, the number could be higher due to cultural factors and the presence of on-site parking stewards. However, from the evidence I was given, I consider that it would be unlikely that any increase would be significant. Accordingly, the transport assessment provides a fair evaluation. [183]
319. Moreover, this level of traffic generation would be for periods limited to 2 prayers sessions on Fridays (Jumah Prayer) that would take place one after the other. For the remainder of the week, the likely traffic generation would be significantly lower. If the proposal would be used occasionally for other related events, this would be little different from what other faiths use their places of worship for. It would not be reasonable for this to count against the proposal. [46]
320. **D'Urton Lane** cul-de-sac is not a main route, although its width permits 2 way traffic for at least car sized vehicles. It would still do so, even with the proposed Guild Wheel improvements. The proposed double yellow lines **along D'Urton Lane** would also prevent vehicles lawfully causing an obstruction on the lane, and this would also benefit access by emergency vehicles, rather than creating a difficulty. Whilst no doubt there would be a steady **stream of traffic along D'Urton Lane** around the times of the Jumah Prayer, it would not cause undue traffic congestion or chaos. Turning of vehicles would take place within the site and so **there would not be a need for worshippers to attempt to turn on D'Urton Lane** itself. **D'Urton Lane would ably be able** to accommodate the likely traffic generation. [102, 184, 186, 234]

Car Parking

321. The 150 car parking spaces would be the subject of the car parking management plan planning obligations. Parking would only be able to be booked via an on-line booking system, and entry would not be permitted if a space has not been booked. Just over half the spaces would be reserved for car sharing. There would also be on-site parking attendants. If the proposal did attract worshippers using the M55, they would be subject to the same booking system and so this should not result in a particular parking issue. [185, 263 to 265]
322. The car parking standards set out in Appendix B to the Local Plan are considered by the City Council to be to maximum and they are the subject of some flexibility, based on accessibility. The car parking provided would be less than the Appendix B standard, but this is a proposal which includes a detailed level of car parking management through the planning obligations. The parking stewards

would also be **looking out for unauthorised parking on D'Urton Lane** under the planning obligations, notwithstanding in any event that it would be the subject of double yellow line restrictions. Double yellow lines would also be likely not to be an undue restriction for local residents because, based on what I observed, most have their own off-street parking. [25, 265]

323. Due to the detailed nature of the car parking management plan, there is limited scope for 'theoretical issues' to occur and nor can it be said to be 'heavy handed' because it deals with the car parking requirements of the proposal. There is not a need to propose alternatives or a back-up and that there are few other parking opportunities in the area has a limited significance. [184, 186]
324. Furthermore, the site is also well located with regard to cycling due to its proximity to the Guild Wheel route which links Preston with Broughton village. There is also a dedicated pedestrian access through and under the M55/A6 roundabout and even if that is considered unappealing, the Guild Wheel route is also available for pedestrians. The crossing over James Towers Way provides ready access to bus stops with services to Preston and Broughton village. [80, 146, 187]
325. As the Section 106 Agreement also contains a planning obligation that requires a Travel Plan, this would further encourage the use of non-car modes of transport. It would also include travel surveys in relation to the car parking booking system and for monitoring. Overall, the management plan and the travel plan provisions provide a robust package of measures to address car parking. [127, 266]

Guild Wheel Cycling and Walking Route

326. For the most part, **the D'Urton Lane cul-de-sac**, whilst forming part of the Guild Wheel route, does not contain a dedicated pedestrian/cycleway. It has a narrow footway found on its northern side and small sections of dedicated cycleway at either end. As the NDP states, the route is hugely popular. Policy CF1 of the NDP seeks for development not to have a detrimental impact on users of the Guild Wheel, and the same approach in this regard is taken by Policy AI 2. Where, the proposal would cross the site access, cyclists and pedestrians would have priority because the proposed dedicated pedestrian/cycleway would be raised over the proposed access. [33, 35]
327. During times when the proposal would be busier around Jumah Prayer, this would provide a safe means of use of the Guild Wheel route. Cyclists and pedestrians would be separated from motorised traffic and they would have a continuous route with priority, in accordance with Local Transport Note 1/20. These site access arrangements and the dedicated pedestrian/cycleway would provide adequate mitigation. [100]
328. The view of the Friends of the Guild Wheel is of significance, given the **organisation's** particular interest as regards the route. The improvements originated from a request from this group and on receipt of such plans showing the dedicated pedestrian/cycleway as now proposed, the group consider earlier concerns over safety have been addressed. [99, 100, 234, 242]

Conclusion

329. I conclude that the proposal would not have an unacceptable effect on highway safety by way of traffic generation, car parking and the Guild Wheel cycling and walking route. It would comply with Policies 2 and 3 of the Core Strategy in relation to the related infrastructure that would be required and how the travel impacts would be managed. The proposal would also comply with Policy ST1 because of the flexibility it applies in relation to parking standards, because of the car parking management plan, the accessibility of the site and the travel plan. It would comply with Policy ST2 of the Local Plan as there would not be safety issues and also when considering the accessibility of the site, and with Policies CF1 and AI 2 because it would not have a detrimental effect on the Guild Wheel route, including safety. [19, 25, 33, 35]
330. The proposal would also accord with the Framework with regard to promoting sustainable transport. Under paragraph 111, there would not be an unacceptable impact on highway safety, and nor would the residual cumulative impacts on the road network be severe. [36, 267]
331. In light of the above, the planning obligations are reasonable, necessary and directly related to the proposed development. As a consequence, they comply with Regulation 122 of the CIL Regulations. [268]

The Design Quality of the Proposed Development

332. The design of the proposal has arisen from an independent RIBA international design competition. This attracted 300 expressions of interest, 213 entries and these were then whittled down to 5 shortlisted entries. The 5 entries which made it through to Phase II of the competition were then subject to detailed design review by experienced RIBA Approved Independent Panellists. In selecting the design of the best quality that was entered in the competition, 212 entries that the panel considered were of a lesser design quality were rejected. This was a robust and comprehensive design process. [87]
333. The site is found in a gateway location with its juxtaposition to the M55, the junction of the M55 and the A6, and as the site landform is raised. In these terms, it is a location that would befit a landmark building. To say that the site represents residual rural elements and is rural in nature is to underplay the influence of the M55 and A6. The Heritage and Character Assessment identifies indicatively at least part of the site falling within a gateway/node. [190, CD K4 page 9]
334. The proposed building would take the form of an elliptical drum that would be positioned nearest the M55 and A6 intersection. The slender minaret tower would be the closest part of the building to this intersection. This would enhance the presence of the building in relation to this gateway. The minaret is designed as a particular feature to augment the landmark status. This would satisfy the NDG in this respect, in relation to creating character and design, with distinctive form of the proposed building. [37, 94]
335. The external finish to the proposed building would be brick interspersed with triangular glazing features, to give rise to what has been referred to colloquially as a **'brick veil' finish**. This ably describes what would be a building of high design quality in terms of its location and appearance. It would provide a strong identity for Preston. With regard to the outside, there would be an expansive

courtyard area. The car parking area would be typical for such a feature, but would not detract from the overall design quality. These outside areas ably demonstrate that the proposal would not be cramped. [45, 82, 148, 190]

336. There was some phraseology expressed at the inquiry and through evidence describing the proposed building as *"bold yet subtle"* and *"it cannot be an iconic structure that is also unobtrusive in the landscape"*, and the like. These are not especially helpful in considering the design quality for planning decision-making, and which I have set out above in more precise terms. [87, 196]
337. There are differing views over whether a design review process was necessary, and whether Phase II of the competition amounted to such a review. The SPD sets out the design review arrangements in place through Places Matter!, the regional design service for the North West. It states that the City Council will identify such schemes at the pre-application stage or alternatively that an applicant can request a review direct. The supporting text to Policy EN9 of the Local Plan simply states that the City Council can encourage design to go through that process. Similar guidance is provided under paragraph 133 of the Framework. Hence, there is no compulsion to go through this process. even if for some projects it may be seen as beneficial. Neither the City Council nor the applicant felt it necessary in this case. [39, 93, 149]
338. Given that the design had already been subject to a robust design competition, **the City Council and applicant's position is understandable** over what a design review could substantively add to the process. Phase II of the competition involved a review because the designs would have to be reviewed in order to come up with the winning design. Designs were refined throughout the process, as was explained at the inquiry in evidence. [93, 192, 194]
339. Where there is more understandable concern is over how the applicant has sought to engage with the local community over the design. This is a separate matter from the RIBA competition because that involved only a small number of panel members. The applicant restricted consultation to the potential users of the building and then relied on the consultation process that the City Council carried out in its statutory function when it was considering the planning application. [190, 192]
340. The applicant has pointed to that pre-application consultation coincided with the restrictions during the Covid-19 pandemic. Yet, that did not stop the applicant consulting with potential users and so it is not evident why that could not have been extended to other residents and the Parish Council, even if by electronic means. If the applicant had done this and considered the responses raised prior to the submission of the application, it may have placated some of the markedly differing views on the proposal that have been subsequently expressed. [92]
341. However, this does not in itself diminish from the design quality of what is proposed. The chosen design of the proposed building is of high quality, when considering its location and appearance. While such broader consultation would have been of benefit in terms of local engagement, the applicant is not compelled to carry wider consultation out.
342. I conclude that the design quality of the proposed development would be high. Context is also an important consideration and I turn to this matter in further detail next.

The effect on the character and appearance of the area, including the countryside and Broughton village

The Countryside

343. The site has countryside characteristics only in as far as it now has the appearance of undeveloped land. It clearly is not though agricultural land as it is not in this use, and so there would be no loss of it. The immediate context is provided by the M55 and the A6, and the associated interchange. The noise of what are not insignificant levels of traffic on these major roads are most apparent on the site. The effect of James Towers Way has also been to create an enclave of buildings and land which effectively forms the **D'Urton lane cul-de sac**. The Bypass Report to the Secretary of State recognised the urbanising effect of James Towers Way. The site is best described in character and appearance terms as semi-urban. [109, 142]
344. That the site lies in open countryside as shown on the Local Plan Policies Map has a limited bearing on this consideration. As has been explained, Policies 1 and EN1 are spatial policies. The same conclusion was also reached in the Goosnargh appeal decisions, where it was recognised that their primary purpose is not related to character and appearance matters. Rather, this is performed by Policies 17, 21 and EN9 of those respective plans that concern design and context. [20, 21, 29, 152, 176]
345. It was acknowledged at the inquiry that the Heritage and Character Assessment that was prepared for the NDP, was the most up to date document as regards character analysis. That document also references the bypass, which was under construction at the time of its preparation, and sets out that it will have a significant effect on the openness and the rural qualities of views of the surrounding landscape. [CD K4 page 19]
346. The effect is that land that can be considered to be truly countryside in character lies some distance from the site, either further along the bypass to the north-east or on the opposite side of Garstang Road and to the north-west. These areas display a rural character because they are formed of an open and rolling agricultural landscape, interspersed with farmsteads and isolated buildings. The site performs no role in this regard with the separation involved and the presence of James Towers Way. Therefore, the proposal would not have an discernible effect on their countryside character.
347. A Public Right of Way (Footpath F4) leads from near James Towers Way into the countryside to the north-east. As this land rises, **the applicant's** Viewpoint 10 shows the site in the distance on the far side of Blundell Brook and James Towers Way and away from the more immediate rural-like setting of the Church. The countryside is in the foreground. Beyond is James Towers Way, buildings along **D'Urton Lane** are in view and then the site. The M55 is to the rear of the site. The proposal would have an adverse effect in that it would involve a new building in that viewpoint. However, such an effect would be minor as regards the effect on the countryside character and so it would not be unacceptable in relation to its visual impact. [112, 234]
348. The views **from the Guild Wheel and along D'Urton Lane would clearly change**, but would not result in a loss of countryside character because these shorter

range views of the site are not defined by land that is countryside in character, but semi-urban, due to the presence of the M55 and James Towers Way. [112]

Broughton Village

349. Broughton village lies some distance north of the site along Garstang Road. It is focussed on a crossroads, where there is a fairly high density of development. From the crossroads, development stretches out in a linear fashion. In the direction of the site, development becomes gradually more occasional. This was ably demonstrated by my unaccompanied site visit, based on the itinerary route provided by the Parish Council. The only cluster of note is the grouping around the church, but this lies away from the village. A new housing site that is under construction lies much closer to the village. The site does not play a discernible role in the character and appearance of the village. [110]
350. With the intervening distance, there would be little discernible impact from the proposal on the character and appearance of the village in this regard. In relation to the effect on the rural setting of the village, as I have set out, the site displays little of rural characteristics and it is closer to the M55 and then the main built up area of Preston. The proposal would not unacceptably impact on the rural setting of the village.
351. As well as its spatial element concerning the edge of the village, Policy NE2 contains a more general provision in relation to landscape screening and tree planting. Clearly, this is a proposal which is designed to be seen but this would be most evident along the M55 and the A6 intersection. Views along both Garstang Road and James Towers Way would be filtered by trees and vegetation, as is shown in Viewpoints 5,6 and 10, even at the times of leaf fall. [32, CD H12 Appendix E]
352. The design of the proposal has sought to suggest Lancashire cotton mills, in particular by way of the minaret evoking a chimney. These have historically been a feature of Preston and the broader region, although not specifically of Broughton village. In terms of what context means, the applicant has sought to apply this on a variety of scales up to regional due to the gateway location of the site. There is some support in this approach from the SPD's Design Principle: Architecture and Townscape where it requires consideration at neighbourhood, street, town and region level. The NDG sees context in a similar way. [88, 90, ID 17 page 10]
353. Context is thus not simply about the immediate surroundings or where boundaries are drawn. The site lies between the built up part of the village of Broughton and the main built up area of Preston. It is nearer to the latter. It is located next to the M55 and the A6. The city and the region have a history of cotton mills, including chimneys, and that the proposal has sought to evoke a chimney means that its design has been shaped by its context. Mills in other parts of the country have no bearing, but this does not change that they are a feature of the context of the site in this regard. [182, 190]

Conclusion

354. I conclude that the proposal would not have an unacceptable effect on the character and appearance of the area, including the countryside and Broughton village. Accordingly, it would comply in this regard with Policies 17 and 21 of the Core Strategy and Policy EN9 of the Local Plan where they concern the design of

new buildings, landscape character, settlement patterns, character, local distinctiveness and the design principles of the SPD. [20, 21, 29]

355. The proposal would also comply with Policy NE2 of the NDP where it involves landscape screening and tree planting. It would also comply with Policies CF1 and AI 2 as it would not have a detrimental effect on the setting of the Guild Wheel route nor be to the detriment of users in this regard. [32, 33, 35]
356. The proposal would also accord with the SPD and the design principles it contains, including on architecture and townscape. Similarly, it would accord with the NDG, including where it involves context and identity, and with Section 14 of the Framework where it concerns the overall quality of the area, good architecture, local character and history and landscape setting, amongst other design considerations. As there are no mandatory requirements over design review and consultation, it would also not fall foul of the SPD and the Framework in this respect. [36, 37, 39]
357. I have also been referred to Policy 13 of the Core Strategy which involves the rural economy. This is not of strict relevance as the proposal does not readily fall within that category of development. In the event that the Secretary of State finds that it is worthy of consideration, the proposal would comply with the policy where it refers to design and character. [19]

Planning balance including need and the benefits of the scheme, as well as drainage and other considerations

Need

358. The proposal would give worshippers a facility in order to practice their faith. The need for the facility derives from the location of the worshippers and evidence has been submitted of the number of households in north Preston and Broughton that would potentially use the proposal. In fact, it exceeds the number of prayer mats proposed at the venue and 2 Jumah Prayer sessions are proposed to deal with the potential demand. It demonstrates a geographical area of demonstrable need. [66 to 68]
359. While clearly there are residents who live very close to the site that are of the Muslim faith and stated at the inquiry that they would use the proposal, the need for such facilities is not bound by the administrative boundary between Broughton and the rest of the Preston City Council area. If it was, it would not be readily possible to plan for such facilities based on where there is likely demand and people simply do not carry out their day to day activities on the basis of where such boundaries may be, including for worship. That being said, the plan showing where the potential users live shows not insignificant numbers in the part of the Parish Council area that lies in the built up area of Preston to the south of the M55. Much of this relates to new housing under the North West Preston Masterplan. [66]
360. Interested parties in favour of the proposal spoke persuasively in terms of what a mosque means to them in relation to worship and community. It would bring benefit to their lives and the main parties accept that such submissions were heartfelt. This is of relevance to need because it also identifies a qualitative aspect. [67, 155, 197]

361. Interested parties who spoke in support of the proposal said that they are having to travel to other parts of Preston to worship at present. There is also no such facility that relates to the mapped area of evidence of need that the applicant submitted. Rather, the nearest existing mosque lies to the north of the city centre and it does not offer convenient access to the potential users with regard to either walking or cycling catchments, in particular. The existing distribution of mosques is focused on the city centre. While the Parish Council raised the Toll Bar Cottage venue, there is not substantive evidence that this would be able to cater for the need and it lies further away again from where the need has been identified, as I observed on my unaccompanied site visit. *[66, 71, 154, 168]*
362. The principle focus of the use of the building would be for worship. Other uses have also been identified, in particular by Interested Parties in relation to a Scout Group, recreational and spiritual activities, and support networks. Whilst these may be less quantifiable, they do not diminish from the need for a place of worship. A faith school does not form part of the proposal. Concerns were also expressed over whether the proposal would be used for events, such as weddings. Such events are not untypical activities for religious establishments. Nor is there substantive evidence that it would not be available for wider community use, in particular with regard to the proposed multi-purpose hall. None of these potential associated uses diminishes from the need case, but instead supplement it. *[156, 198]*
363. Policy 25 of the Core Strategy is permissive with regard to community facilities, including places of worship because it seeks to ensure that local communities have sufficient provision. Working with public, private and voluntary sector providers to meet demonstrable need has been ably established in this case, as all have been involved. I have already set out that it would be in a location that is accessible by all modes of transport. The other criteria of this policy are not of relevance. *[21, 71]*
364. The NDP is not silent on community facility provision and it identifies a deficiency in relation to a multi-use community building. The Parish Council has referred to the new community centre at Toll Bar Cottage in this regard. The proposal would be a community building and have the potential to be multi-use when worship is not taking place. There is though no exclusion on increasing community facility provision under the NDP. *[69, 175, 200]*
365. Much emphasis on those opposing the proposal has been placed on that a need for a mosque was not identified during the preparation of any of the development plans. The latest of these plans is the NDP from 2018, and so in practice the consultations which informed these plans are becoming dated. The Parish Council has carried out subsequent surveys but it is open to question to what extent this grapples with mosque provision, in particular where the need may transcend the Parish Council boundary. The need evidence submitted by the applicant is also more recent than the evidence which informed development plan preparation. *[66, 169]*
366. Accordingly, the need evidence is to be considered in its own right and is not bound by the evidence that underpinned development plan preparation, in particular as it is more up-to-date. Nor is development precluded from coming forward under the planning system by waiting for future development plan preparation to see if a site is identified. Section 4 of the Framework cautions

against prematurity arguments. Ultimately, this all falls to be considered in the planning balance. [36, 199]

367. Section 8 of the Framework in particular is supportive of community facility provision, including places of worship, and planning policies and decisions are to enable the development of such facilities and plan positively in this regard. Concerning whether the Framework fills a void in the development plans, the plans in any event are supportive in principle of community facility development. If they were not, they would not be consistent with the Framework and so less weight would be attributed to any conflict with them. The Framework sets out **the Government's planning policies for England and how these should be applied**. It is a material consideration in the planning decision that the Secretary of State will make. [36, 67, 175]
368. There is not a requirement under either the development plan or the Framework to consider alternative sites. The task is to consider the planning merits of the particular application for planning permission, not whether the proposal may be more appropriately located at an alternative site. As such, the applicant is not bound to consider alternatives. There are not exceptional circumstances that justify taking a different approach. The same applies as regards considering alternative uses for the site itself. [65, 235]
369. In conclusion, there is a demonstrable need for the proposal and the need is compelling. It is not therefore a 'speculative application'. The proposal would comply with Policy 25, the NDP and the Framework with the need that has been identified, as well as with the support they provide for community facilities, including places of worship. [21, 36, 208]
370. The Secretary of State is advised that the publication of the 2021 census is due shortly. This will have a bearing over need because it will likely show the number of Muslim households in the area at the time of the census.

Drainage

371. The site does not currently benefit from a connection to the foul water drainage system. The applicant proposes this would be dealt with through the grant of permission by way of a planning condition. This is not an untypical solution and there is not substantive evidence that the site would not be able to be adequately foul water drained. As I have set out earlier in my report, the number of prayer mats gives an indication of the likely usage and whilst this number could be higher due to cultural factors and on-site parking stewards, the difference would be unlikely to be significant. In the circumstances the evidence indicates foul water drainage could be adequately accommodated. The statutory consultee also did not raise objection on these grounds, subject to condition. [122, 205, 245, 253, 258, 321]
372. The main parties agree that surface water drainage could be dealt with through condition. In that regard, a Drainage Strategy and a SuDS pro forma has been submitted, as well as indicative details of the surface water drainage proposals, which show how surface water drainage would be dealt with. Interested parties have made me aware of issues that have arisen as a result of the bypass construction. Whilst I am not unsympathetic in this regard, I am satisfied from the available information that the proposal itself would be able to be adequately drained. It should not be charged with resolving broader drainage issues in the

area, beyond adequately dealing with the surface water that would be discharged. This would be achieved through the imposition of the suggested conditions. [122, 205, 211, 253, 257, 258].

373. On this basis, I conclude that the proposal would comply with Policies 29 of the Core Strategy and NE3 of the NDP as subject to conditions it would satisfactorily provide foul and surface water management and as it does intend to incorporate sustainable drainage schemes. [23, 32]

Other Considerations

Energy Efficiency and Renewable Energy

374. The proposal involves energy efficiency measures by way of a hypocaust passive cooling system within the fabric of the building and photovoltaic cells on the flat roofed element of the main building. The cooling system would make use of natural ventilation embedded in the design of the building. Whilst the potential for a heat pump system was also discussed at the inquiry, it was apparent that it would be subject to feasibility and funding. It should therefore have a limited bearing. [123, 150, 203]
375. The proposal has been designed to meet a BREEAM standard of 'very good'. This equates to the minimum standard that is set out under Policy 27 of the Core Strategy. In terms of whether the energy efficiency measures have been 'checked', as stated above, they form part of the proposal. It is not a case which is reliant on subsequent details of what measures are to be utilised. Comparisons with a mosque in Cambridge do not thus take this consideration further because what would result is dependent on the particular design of the proposal. [22, 201, 202]
376. Policy 27 does not require the submission of carbon calculations and no party has provided such information. Hence, it should not be considered that the proposal would have a high, or indeed low, carbon footprint in relation to its construction and operation. It would however incorporate renewable energy by way of the solar panels. Electric vehicle charging points would also be provided by way of the suggested conditions, as would the energy efficiency standard. The integral nature of the energy efficiency measures would further evidence that the design quality of the proposed development would be high. The proposal would accord with the requirements of Policy 27. [150, 204, 235, 255, 257]

Non-Designated Heritage Assets

377. The Parish Council also submitted evidence over the effect on non-designated heritage assets in relation to Church Hill Cottage and Farm Buildings, White Cottage and ancillary buildings, and Springfield Cottage, **that lie on D'Urton Lane**. They appear to date from the 19th century with their significance as residual elements to Broughton village and its then rural context. They are well separated from the Church hamlet and a considerable distance from the main village itself. The Church hamlet is not an identified non-designated heritage asset. [40, 181]
378. The immediate agricultural and rural context is much diminished with the advent of the M55 and James Towers Way. As the site itself is not in agricultural use and lies in a semi-urban context, it does not fall into such a context now for these non-designated heritage assets. There is also the new housing between Church Hill Cottage and the site, whilst White Cottage lies on the opposite side of the

road, and opposite the housing site. Springfield Cottage lies further along D'Urton Lane again. As such, and even though there is not a great deal of distance between the site and these non-designated heritage assets, it does not make any contribution in terms of setting to their significance.

379. The proposal would thus not have an unacceptable effect on the significance of non-designated heritage assets and so it would comply with the protections that are afforded to the historic environment in this regard through Policies 16 and 17 of the Core Strategy, Policy EN8 of the Local Plan and General Policy HE of the NDP. [20, 28, 34]
380. As no harm would arise, there is not a need to carry out a balancing exercise under paragraph 203 of the Framework.

Living Conditions

381. **The nearest residential properties lie on the opposite side of D'Urton Lane** to the site and adjacent to it on the new housing development. There would be no external amplified noise and no call for prayer by way of the suggested planning condition. Instead, worshippers would be expected to make their way to the proposal at the appropriate times and simply then make their way from the car park into the proposed building. There would not be a particular reason for them to congregate outdoors in respect of transient noise. [260]
382. There would be likely some traffic noise as vehicles arrive and depart, but this would be largely confined to the short period around Jumah Prayer on Fridays, when attendance would be at its highest. It is also not an environment that is free from vehicular noise, due to the presence of the M55 and James Towers Way. It was confirmed verbally at the inquiry that the site does not lie in an air quality management area and there is not substantive evidence that traffic emissions would be unacceptable in this regard. [235]
383. As the proposed building would be located in the part of the site nearest the M55/A6 junction, it would be some distance from the nearest residential properties so as to prevent undue overlooking. The activities would also largely take place at ground floor level and there would be no obvious reason why worshippers would seek to look over into the nearest properties, even if this proves possible. Hence, the effect on privacy levels would not be unacceptable. While clearly **the outlook from the nearest properties to the site on D'Urton Lane** would change, as well as those on the nearest part of Garstang Road, bearing in mind the design quality of the proposal and that it is a semi-urban location, this would not be unacceptable. [235]
384. There is no apparent reason why associated littering with the proposal would occur because as a place of worship it would not obviously generate such debris. Concerning the potential to impact on television signals and telecommunications, the highest part of the proposal, the proposed minaret, would be a slender structure and so it would be unlikely to cause harm in this regard. [211, 235]

Biodiversity

385. The PEA demonstrates that the site has limited ecological value. It is not the subject of related designations and nor is there an identified need to carry out further survey work. The PEA identifies that there is the potential to increase biodiversity through landscaping by way of tree planting. The proposal would

provide a biodiversity net gain in accordance with the Framework, and this is contained in the suggested planning conditions. [125, 248, 252]

Minerals Safeguarding

386. The northern part of the site lies within a minerals safeguarding area under the minerals and waste development plans, as do a number of residential properties on D'Urton Lane themselves and James Towers Way. The part of the proposal contained within this area comprises broadly the access, part of the car park and the service building. **Given the site's** semi-urban location and its proximity to other development, it is extremely unlikely that the mineral would be extracted, and thus is considered no longer of any value. As a result, there would not be conflict with minerals safeguarding. [15]

Benefits

387. Need There is a demonstrable need for a mosque in this location. It would fulfil the worship requirements of the local Muslim community and be in a location that would be accessible to its likely users. It would also provide a social and community point of contact. Whilst its primary function would be for worship, it would also be available for other members of the local community as a community facility.
388. Related to the need benefit is that of social inclusion. Places of worship, regardless of their denomination, are open and inclusive because they are a community facility. The proposal would also allow for the creation of equal and cohesive communities, and increase diversity. This is understandably a City Council corporate objective. Nor would the proposal result in social tension. Quite the opposite would occur, based on a fair and reasonable understanding of the proposal.
389. The need case is compelling. Not only does the proposal accord with development plan policies, but is supported by Policy 25 of the Core Strategy because it would ensure that local communities have sufficient community facilities provision. For similar reasons, the proposal attracts support from the Framework as it would allow for a planning decision to plan positively for a place of worship. It would strongly support the social objective of sustainable development under the Framework. The need for the proposal attracts significant weight as a benefit.
390. Design Quality It is rare in my experience for a proposal to be the subject of an international design competition and further still, where it has whittled down from some 213 entries to one. The brick veil description ably describes what is proposed with the arrangement of brickwork and glazing features. The proposed minaret would be evocative of a cotton mill chimney, which is part of the regional context. The site by virtue of its gateway status needs a design that would give the proposal landmark status. This would be pleasingly achieved. I have expressed some reservations about the local consultation that the applicant carried out, but nevertheless this would not diminish from the particular design quality of what is proposed.
391. Furthermore, the proposal would manage to achieve this without compromising either the character and appearance of the countryside, or of Broughton village.

It has managed to successfully balance what are often two conflicting objectives, a landmark design and context.

392. The thrust of development plan policies is to support high quality design and the proposal would accomplish and indeed exceed this aspiration. The Framework sets out to achieve well designed places and the proposal would ably meet and surpass this aspect of national planning policy. It would strongly support the social objective of sustainable development under the Framework in this regard. The design quality of the proposal attracts significant weight as a benefit.
393. Guild Wheel The proposed segregated pedestrian/cycleway would connect two such sections of the Guild Wheel, so that users would not have to share road space with motorised vehicles. It would also provide a raised table priority over the neighbouring housing development access, as well as the site itself. The Guild Wheel improvements go beyond simply mitigation for the proposal because they would benefit cyclists and pedestrians when there is not the peak traffic movements associated with the proposal on early Friday afternoons.
394. The proposal goes beyond complying with Policies CF1 and AI2 of the NDP because it would be supported by these policies as it would improve the Guild Wheel facility and benefit users, and so also enhance its popularity. The improvements to the Guild Wheel attract moderate weight as a benefit.
395. Sustainability The proposal would incorporate energy efficiency and renewable energy measures. This would achieve compliance with Policy 27 of the Core Strategy with regard to the required BREEAM rating. Similarly, the proposal would be accessible as regards non-car modes of transport, but this is also needed for the proposal to accord with Policy 25.
396. Nevertheless, energy efficiency and renewable energy measures are integral to the design of the proposal. Some thought has clearly gone into this through the design process and such measures have not been treated as an afterthought to try to demonstrate policy compliance. The proposal would therefore support the environmental objective of sustainable development under the Framework. The measures attract moderate weight as a benefit.
397. Economic Benefit These would arise principally through the construction phase, including related employment and use of businesses. The proposal is not insignificant as a development in relation to the construction that would be required. It would support the economic objective of sustainable development under the Framework. This attracts moderate weight as a benefit.

Planning Balance and Conclusion

398. **Paragraph 202 of the Framework states that** *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”* The Church of St John the Baptist is Grade II* and the harm to its significance must be given great importance and weight.
399. The public benefits in this case attract very considerable weight. The proposal would provide a place of worship for a not insignificant number of people to practice their faith and promote social inclusion as a place of worship. It would also be of high architectural design quality, provide for an improvement of the

Guild Wheel for cyclists and pedestrians, and have energy efficiency and renewable energy credentials. There would also be benefits to the local economy, in particular during the construction phase. On this basis, I consider that the public benefits would outweigh the less than substantial harm to The Church of St John the Baptist. [121, 144]

400. The Secretary of State wishes to be informed of "*The extent to which the proposed development is consistent with the development plan for the area*". The proposal would not comply with Policies 1 of the Core Strategy and EN1 of the Local Plan. As these policies are central to the spatial strategy of the development plan, the proposed development would be contrary to the development plan as a whole. As regards the Church of St John the Baptist only, there would be conflict with Policies 16 and 17 of the Core Strategy, Policy EN8 of the Local Plan and General Policy HE of the NDP.
401. There would not be conflict with the remaining policies of the Core Strategy, the Local Plan and the NDP. The proposal would not be unacceptable with regard to "*any other matters the Inspector considers relevant*" by way of designated heritage matters other than The Church of St John the Baptist, highway safety, character and appearance and the other considerations. In the event that the Secretary of State considers that the proposal falls to be considered against Policy AD1(a) of the Local Plan, there would be compliance with its criteria as regards character and appearance, living conditions and highway safety related matters.
402. The proposal would elicit support from Policy 25 of the Core Strategy due to need; the design policies of the development plan in particular Policy EN9 of the Local Plan because of the design quality; and, with Policies CF1 and AI2 of the NDP as a consequence of the Guild Wheel improvements. Overall, this is the extent to which the proposed development is consistent with the development plan for the area.
403. I have also not found conflict with the Framework, and it lends support to the proposal as regards its economic, social and environmental objectives, notwithstanding that they are not criteria against which every decision can or should be judged. The site is not previously developed land but it is not a case where this further counts against the proposal because I have already found conflict with Policy 1 for the reasons that I have given. The Framework also does not preclude the development of greenfield land and the site is not countryside as regards its character. The proposal would also accord with the NDG, as well as the SPD.
404. Therefore, the harm which arises in this case relates to the conflict with the spatial strategy of the development plan and the development plan as a whole, and the effect on The Church of St John the Baptist and the conflict with the associated development plan policies as regards this asset. Set against this would be the compelling case as regards need, the high design quality, the improvements to the Guild Wheel, and the associated support from development plan policy and the Framework. The sustainability credentials and the economic benefits also favour the proposal. Overall, these benefits attract very significant weight. All other matters attract neutral weight, including those that can be dealt with through the planning obligations and the suggested planning conditions.

405. With regard to planning decision-making, the application of Section 38(6) of the Planning and Compulsory Purchase Act 2004 applies. This states that *"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."*
406. In conclusion, I find this is a case where there are material considerations that indicate that the application should be determined otherwise than in accordance with the development plan.
407. In coming to my recommendation, I have also had regard to Articles 9 and 14 of the Human Rights Act 1998 (HRA) which concern respectively freedom of thought, conscience and religion, and the prohibition of discrimination. Article 9 is a qualified right. Dealing with a qualified right involves balancing the fundamental rights of individuals against the legitimate interests of others and the wider public interest. Article 14 does not confer any free-standing right, but it should rather be taken as informing all actions (including failures to act) by public authorities.
408. I have also had due regard to Section 149(1) of the Equality Act 2010 (EA) which imposes a Public Sector Equality Duty (PSED) on a public authority in the exercise of its functions, including the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the EA; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it; and fostering good relations between persons who share a relevant protected characteristic and persons who do not share it. **A 'protected characteristic' is defined to include religion.**
409. Under the PSED, due regard means a duty to ensure that any decision giving rise to any negative impacts in relation to these aims is informed and made with regard to any less harmful alternative outcome, and a duty to seek to achieve a positive outcome in respect of these aims where possible.
410. If the Secretary of State is minded to take a different position from my recommendation, he will need to consider under the HRA and PSED whether the wider public interest can only be safeguarded if the proposal does not proceed and if not granting planning permission would be a proportionate response that would not violate the worshippers' human rights.

Inspector's Recommendation

411. It is recommended that planning permission be granted for the proposal, subject to the planning obligations in their entirety in the S106 Agreement and the planning conditions that are set out in Annex Three.

Darren Hendley

INSPECTOR

ANNEX ONE: APPEARANCES

FOR THE APPLICANT:

Mr Christiaan Zwart

Of Counsel, instructed by Alban Cassidy, Cassidy + Ashton

He called

Melanie Lloyd Morris Dip. Arch Cons, IHBC, MRTPI

Timothy Russell BSc (Hons), MIHT
Jonathan Carter BArch RIBA FRSA

Alban Cassidy BA (Hons) Cert. Ecol. MSc MIEMA MRTPI C.Env

Stuart Ryder, BA (Hons) CMLI

Consultant, Mel Morris Conservation Heritage

Associate Director, Eddisons

Director, Rolfe Judd

Director and Head of Town Planning, Cassidy + Ashton

Director of Ryder Landscape Consultants Ltd

FOR THE LOCAL PLANNING AUTHORITY:

Mr Piers Riley-Smith

Of Counsel, instructed by Wendy Kearns, Preston City Council

He called

Laura Holden MPLAN, LRTPI

Senior Planning Officer (Development Management), Preston City Council

James Mercer

Principal Planning Officer, Preston City Council (spoke during the Character and Appearance, Planning Obligations and Planning Conditions Round Table Sessions)

Ian Blinkho

Senior Legal Officer, Preston City Council (spoke during the Planning Obligations Round Table Session)

FOR THE RULE 6 PARTY (BROUGHTON IN AMOUDERNESS PARISH COUNCIL):

Mr Peter Black

Advocate, instructed by Broughton in Amounderness Parish Council

He called

Cllr Pat Hastings RN, RT, BSc, PGDE

Jackie Copley MA, BA (Hons), PgCert, MRTPI

Ian Millership, CMILT, MIHT, MSc, BSc (Hons)

Rob Burns Archaeology, PG Planning and Urban Design

Chair, Broughton in Amounderness Parish Council

Planning Director, CPRE (but acting independently)

Transport Planner, CTS Traffic & Transportation Ltd

Heritage Consultant

INTERESTED PARTIES:

Alf Clempson	On Behalf of Rt Hon Ben Wallace MP
Simon Watson	Resident
Dr Peter Bunting	Resident
Mike Booth	Resident
Sumaiya Moreea	Resident
Les Brown	Resident
Tina Murtza	Resident
Fatima Ismail	Resident
Muhammad Javid	Resident
Vali Patel	Resident
Zuber Isap	Resident
Gordan Hayward	Resident
Scott Sargeant	Resident
Dr Afzal	Resident
Seema Bux	Resident
Shoayb Bux	Resident
Khalid Ibrahim	Resident
Jamel Murtza	Resident
Mr Bapu	Resident
Mr Khazi	Resident
Mr Zinga	Resident
Dr Ahmed	Resident
Mr Horne	Resident
Taalib Shamsuddin	Resident

ANNEX TWO: DOCUMENTS

CORE DOCUMENTS

Planning Policy Documents and Other Material Consideration

- A1 Preston Local Plan – 2012-2026
- A2 Appendix A – Preston Local Plan Policies Map
- A3 Preston Local Plan Policies Map Key
- A4 Central Lancashire Core Strategy
- A5 Central Lancashire Design Guide SPD
- A6 Broughton Neighbourhood Development Plan
- A7 North West Preston Masterplan

Inquiry Documents (Prior to Inquiry)

- B1 Applicant Statement of Case
- B2 Applicant Statement of Case Appendices
- B3 Appendix CA1 – SoS Holding Direction
- B4 Appendix CA2 – Call-In Letters
- B5 Appendix CA3 – Start Date Letters
- B6 Appendix CA4 – Updated Preliminary Ecological Assessment
- B7 Appendix CA5 – **Copy of Approved Scheme at D’Urton Lane** – Parts 1 and 2
- B8 Appendix CA6 – Planning Policy Context
- B9 Appendix CA7 – Pre-Application with LCC
- B10 Appendix CA8 – Growth Lancashire Consultation Response
- B11 Appendix CA9 – Similar Applications – Parts 1 and 2
- B12 Local Planning Authority Statement of Case
- B13 Appendix A – Agreed Draft Conditions
- B14 Appendix B – Agreed Draft Section 106 Obligation
- B15 Agreed Statement of Common Ground between PCC and CA
- B16 Rule 6 Party Statement of Case – Broughton Parish Council

Planning Application Documents and Plans

- C1 Application form and ownership certificate
- C2 Location Plan
- C3 Site Plan - 1
- C4 Site Plan – 2
- C5 Elevations
- C6 Roof Plan
- C7 Proposed Plans & Elevations (Service Building)
- C8 Proposed 3D View (1)
- C9 Proposed 3D View (2)
- C10 Proposed 3D View (3)
- C11 Proposed 3D View (Aerial)
- C12 Proposed Access and Highway Improvements
- C13 Refuse Vehicle Tracking
- C14 Arboricultural Impact Assessment
- C15 Car Park Management Plan
- C16 Car Park Management Plan Technical Note
- C17 Design and Access Statement
- C18 Draft Head of Terms

- C19 Drainage Strategy
- C20 Glint and Glare Study
- C21 Heritage Statement
- C22 Highways Technical Note
- C23 Highways Technical Note 2
- C24 Highways Technical Note 3
- C25 Indicative Surface Water Drainage Proposals
- C26 Land Contamination Assessment
- C27 Land Contamination Assessment – Appendix 1
- C28 Land Contamination Assessment – Appendix 2A
- C29 Land Contamination Assessment – Appendix 2B
- C30 Maps of Households Expected to Attend Mosque
- C31 Map of Housing Developments in North Preston
- C32 Map of Walking and Driving Catchment Areas
- C33 Noise Assessment
- C34 NW SuDS Pro-forma – **D’Urton Lane, Preston**
- C35 Preliminary Ecological Assessment
- C36 Statement of public benefit
- C37 Table of UK Mosques
- C38 Transport Assessment
- C39 Travel Plan
- C40 Tree Complaints Data
- C41 Utilities Statement Plan
- C42 Utilities Statement
- C43 Addresses of Expected Local Attendees (redacted)

Consultee Responses

- D1 Broughton Parish Council 1
- D2 Broughton Parish Council 1a
- D3 Broughton Parish Council 2
- D4 Broughton Parish Council 2a
- D5 Broughton Parish Council 2b
- D6 Broughton Parish Council 3
- D7 Waste Management 1
- D8 Waste Management 2
- D9 CPRE
- D10 Environmental Health 1
- D11 Environmental Health 2
- D12 Friends of the Guild Wheel 1
- D13 Friends of the Guild Wheel 2
- D14 Greater Manchester Ecology Unit
- D15 Growth Lancashire 1
- D16 Highways England 1
- D17 Highways England 2
- D18 Highways England 3
- D19 Highways England 4
- D20 Highways England 5
- D21 Historic England
- D22 LCC Highways 1
- D23 LCC Highways 2
- D24 LCC Highways 3

- D25 LCC Highways 4
- D26 LCC Highways 5
- D27 LLFA 1
- D28 LLFA 2
- D29 United Utilities

Committee Report and Minutes

- E1 Planning Committee Report – 3 February 2022
- E2 Planning Committee Late Changes – 3 February 2022
- E3 Planning Committee Printed Minutes – 3 February 2022
- E4 Planning Committee Report – 8 July 2021
- E5 Planning Committee Late Changes – 8 July 2021
- E6 Planning Committee Printed Minutes – 8 July 2021

Call-In Documents

- F1 **Inspector's Pre Conference Note**
- F2 Case Management Conference (CMC) Joining Instructions
- F3 Case Management Conference Agenda
- F4 Case Management Conference Post Conference Note

Relevant Case Law

- G1 The Setting of Heritage Assets
- G2 Regina (Palmer) v Herefordshire Council (2017)
- G3 East Northamptonshire District Council v Secretary of State for Communities and Local Government (2015)
- G4 Bramshill House Decision
- G5 Catesby Estates and SSCLG v Steer Judgement (18 July 2018)
- G6 South Lakeland District Council v SSE and another respondents House of Lords (30 January 1992)
- G7 City and Country Bramshill Ltd v Secretary of State for Housing Communities and Local Government (2021)

Applicant's Proof of Evidence

- H1 APC Proof of Evidence
- H2 Appendices to APC Proof of Evidence (Part 1 – Part 7)
- H3 Summary Transport Proof of Evidence
- H4 Transport Proof of Evidence
- H5 Design Assessment
- H6 Heritage Summary Proof
- H7 Heritage Proof of Evidence
- H8 Heritage Appendix 1 – Heritage Statement
- H9 Report to the Secretary of State for Transport
- H10 Summary Landscape Proof of Evidence
- H11 Landscape Proof of Evidence
- H12 Appendix Report to Proof of Evidence on Landscape and Visual Matters and LVA
- H13 Landscape and Visual Appraisal

LPA's Proof of Evidence

- I1 Summary of Proof of Evidence
- I2 Proof of Evidence

BPC's Proof of Evidence

- J1 Final Planning Proof of Evidence Summary
- J2 Final Planning Proof of Evidence
- J3 BNDP Executive Summary
- J4 BNDP Proof Draft
- J5 Heritage Report
- J6 Broughton Appendix 1
- J7 Broughton Appendix 2 – Viewpoints
- J8 Broughton PC – SOC – Review of Transport Documents Presented in Support of Application Summary
- J9 Broughton PC - Review of latest transport documents and resurvey of current local mosque operation (May 2022)
- J10 Rule 6 Party – Comments on Statement of Common Ground
- J11 Appendix A – Draft Conditions
- J12 Appendix B – S106 Final
- J13 Rule 6 Party Itinerary

Applicant's Rebuttal Proofs

- K1 APC Rebuttal
- K2 Heritage Rebuttal
- K3 Heritage Rebuttal Appendix Title Page
- K4 Heritage Rebuttal Appendix

INQUIRY DOCUMENTS

- ID1 Rob Burns response to Rebuttal Proof of Evidence of Melanie Lloyd Morris
- ID2 **Applicant's Opening Statement**
- ID3 Opening Submissions on Behalf of the Council (City Council)
- ID4 Opening Statement – Rule 6 party
- ID5 APP/H5390/V/21/3277137 Section 77 Application – Edith Summerskill House, Clem Atlee Court, London SW6 7TW. Decision and Inspectors Report.
- ID6 Transcript of speech of Simon Watson (interested party)
- ID7 Email dated 2 August 2022 from Taalib Shamsuddin
- ID8 Preston City Council, Local Heritage list for the rural areas of Preston
- ID9 Melanie Lloyd Morris further response to Rob Burns, dated 2 August 2022
- ID10 Amended Summary Proof of Cllr Pat Hastings
- ID11 Department of Transport, Local Transport Note 1/20 Cycle Infrastructure Design, July 2020
- ID12 Email from Cllr Pat Hastings concerning church hamlet conservation area status, dated 3 August 2022
- ID13 Communities and Local Government Localism Bill: neighbourhood plans Equalities impact assessment and associated extract from **Examiner's Report** into the Neighbourhood Development Plan
- ID14 Joint Lancashire Minerals and Waste Development Framework, Core Strategy DPD (February 2009)

- ID15 Joint Lancashire Minerals and Waste Local Plan, Site Allocation and Development Management Policies – Part One (September 2013).
- ID16 Drawing ref: CHA 1 E0252-3000-01 Proposed Landscape Enhancement and Mitigation Scheme Broughton Bypass dated June 2015 Scale 1:500
- ID17 National Design Guide
- ID18 Broughton-in-Amounderness Neighbourhood Development Plan Second Examiners Report (26 June 2018)
- ID19 Bundle of documents from the applicant submitted 5 August 2022 concerning construction and aerial photos of the site, and email correspondence with Lancashire County Council
- ID20 Email from Cllr Pat Hastings concerning the construction compound and Lancashire County Council, dated 8 August 2022
- ID21 *The Queen on the application of Cherkley Campaign Limited and Mole Valley District Council and Longshot Cherkley Court Limited* [2014] EWCA Civ 567
- ID22 Cojoined appeal decision refs APP/N2345/W/20/3258890 and 3258894 Whittingham Lane, Goosnargh
- ID23 Melanie Lloyd Morris Clarification Note concerning Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, dated 7/8/2022
- ID24 Email from City Council concerning Revised Condition 6 – drainage, dated 9 August 2022
- ID25 Bundle of documents from the applicant submitted 9 August 2022 concerning a housing site to north of the application site
- ID26 Bundle of documents from the applicant submitted 9 August 2022 concerning further site information
- ID27 Preston City Council, CIL Compliance Statement
- ID28 Draft Agreement under section 106 Town and Country Planning Act 1990 **relating to land to the South of D'Urton Lane, Broughton, Preston, PR3 5LD**
- ID29 Closing statement – Rule 6 Party
- ID30 Closing Submissions on Behalf of Council (City Council)
- ID31 **Applicant's Closing Submissions**
- ID32 Agreement under section 106 Town and Country Planning Act 1990 relating to **land to the South of D'Urton Lane, Broughton, Preston, PR3 5LD – Final certified version**

ANNEX THREE: SCHEDULE OF CONDITIONS

- 1) Details of the landscaping (hereinafter called "the reserved matter") shall be submitted to and approved in writing by the Local Planning Authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matter shall be made to the Local Planning Authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the reserved matter to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the following approved plans:
 - L01 – Location Plan
 - 001 Rev C – Proposed Access and Highway Improvements
 - 002 Rev A – Proposed Refuse Vehicle Tracking
 - Proposed Roof Plan dated November 2021
 - Proposed Site Plan dated November 2021
 - Proposed Floor Plans - Service Building dated October 2021
 - Proposed North Elevation – Service Building dated October 2021
 - Proposed South Elevation – Service Building dated October 2021
 - Proposed East and West Elevation – Service Building dated October 2021
 - Proposed Cross Section – Service Building dated October 2021
 - Proposed West Elevation – Mosque dated October 2021
 - Proposed South Elevation – Mosque dated October 2021
 - Proposed East Elevation – Mosque dated October 2021
 - Proposed North Elevation – Mosque dated October 2021
- 5) Any future application for reserved matters shall include a Landscaping and Ecological Enhancement Plan which shall provide for a biodiversity net gain.
- 6) No development hereby permitted shall commence until a detailed, final foul and surface water sustainable drainage strategy for the site has been submitted to, and approved in writing by, the Local Planning Authority. The detailed sustainable drainage strategy shall be based upon the site-specific indicative sustainable drainage strategy submitted and sustainable drainage principles and requirements set out in the National Planning Policy Framework, Planning Practice Guidance and Defra Technical Standards for Sustainable Drainage Systems and no surface water shall be allowed to discharge to the public foul sewer(s), directly or indirectly. The details of the drainage strategy to be submitted for approval shall include, as a minimum:
 - a) Sustainable drainage calculations for peak flow control and volume control (1 in 1 year, 1 in 30 year and 1 in 100 year + 40% climate change storm events), with a 10% allowance for urban creep;
 - b) Final sustainable drainage plans appropriately labelled to include, as a minimum:
 - i. Plan identifying areas contributing to the drainage network, including surface water flows from outside the curtilage as necessary;
 - ii. Sustainable drainage system layout showing all pipe and structure references, dimensions, design levels;

- iii. Details of all sustainable drainage components, including landscape drawings showing topography and slope gradient as appropriate;
 - iv. Drainage plan showing flood water exceedance routes in accordance with Defra Technical Standards for Sustainable Drainage Systems;
 - v. Finished Floor Levels (FFL) in AOD with adjacent ground levels for all sides of each building and connecting cover levels to confirm minimum 150mm+ difference for FFL;
 - vi. Details of proposals to collect and mitigate surface water runoff from the development boundary; and
 - vii. Measures taken to manage the quality of the surface water runoff to prevent pollution, protect groundwater and surface waters, and deliver suitably clean water to sustainable drainage components;
- c) Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltration rates and groundwater levels in accordance with BRE 365 or Falling Head Permeability Test;
 - d) Evidence of an assessment of the existing on-site drainage features to be used, (if any) to confirm that these systems are in sufficient condition and have sufficient capacity to accept surface water runoff generated from the development;
 - e) Evidence that a free-flowing outfall can be achieved. If this is not possible, evidence of a surcharged outfall applied to the sustainable drainage calculations will be required; and
 - f) Details of the design and specification of the foul water treatment plant or any tertiary treatment plants.

The sustainable drainage strategy shall be implemented prior to first use of the development hereby permitted in accordance with the approved details and thereafter maintained.

- 7) No development hereby permitted shall commence until a Construction Surface Water Management Plan, detailing how surface water and storm water will be managed on the site during construction, including demolition and site clearance operations, has been submitted to and approved in writing by the Local Planning Authority. The details of the plan to be submitted for approval shall include for each phase, as a minimum:
 - a) Measures taken to ensure surface water flows are retained on-site during construction phase(s), including temporary drainage systems, and, if surface water flows are to be discharged, they are done so at a restricted rate that must not exceed the equivalent greenfield runoff rate from the site; and
 - b) Measures taken to prevent siltation and pollutants from the site into any receiving groundwater and/or surface waters, including watercourses, with reference to published guidance.The Construction Surface Water Management Plan shall be implemented and thereafter managed and maintained as approved for the duration of construction.
- 8) No development hereby permitted shall commence until:

(a) A plan showing the alignment and elevational treatment of a temporary fence during the construction period for the whole site and a permanent close-boarded fence or similar of not less than two metres in height to be erected along the boundary of the development site where it fronts the motorway or slip road (or at least one metre from any part of the existing motorway fence where the boundary lies within one metre of this) along with a timetable for implementation shall be submitted to and agreed in writing by the Local Planning Authority; and

(b) The fences approved by part (a) of this condition has been erected in accordance with the agreed details.

The temporary fence shall remain in situ for the construction period only. Thereafter, the permanent fence shall remain in situ and only be repaired or replaced in accordance with the requirements of this condition and be thereafter retained.

Details of boundary treatment for the remainder of the site shall be submitted alongside the landscaping details at reserved matters stage.

- 9) No development hereby permitted shall commence until a detailed construction plan working method statement relating to site development earthworks and drainage alongside the M55 motorway in accordance with the relevant design standards has been submitted to and approved in writing by the Local Planning Authority. The approved detailed construction plan working method statement shall be adhered to throughout the construction period for the development hereby permitted.
- 10) No development hereby permitted shall commence until a Construction Environmental Management Plan (CEMP) is submitted to and agreed in writing by the Local Planning Authority. The CEMP shall provide for: (i) The means of highway access and parking for construction vehicles, plant and construction workers' vehicles and sustainable travel methods for construction workers, (ii) loading and unloading of plant and materials, (iii) storage of plant and materials used in constructing the development, (iv) storage, disposal and removal of spoil and waste arising out of the construction works, (v) hours of working, (vi) site security arrangements, including hoardings and other means of enclosure, (vii) piling methods, if used, (viii) wheel cleaning facilities, (ix) measures to control the emission of dust and dirt during construction, (x) measures to control the emission of noise. The approved CEMP shall be adhered to throughout the construction phase of the development.
- 11) No development shall commence until details of the proposed finished floor levels; ridge and eaves heights of the buildings hereby permitted have been submitted to and approved in writing by the Local Planning Authority. The submitted levels details shall be measured against a fixed datum and shall show the existing and finished ground levels, eaves and ridge heights of surrounding property. The development hereby permitted shall be carried out in accordance with the approved details.
- 12) Within three months of the commencement of development on site, a BRE Interim Certificate confirming that the development shall achieve a post-construction Building Research Establishment Environmental Assessment **Method (BREEAM) rating of at least 'very good' shall be submitted to and approved in writing by the Local Planning Authority.** The development shall

thereafter be carried out in accordance with the approved details and a BRE Final Code Certificate shall be submitted to and approved in writing by the Local Planning Authority prior to first use of the development hereby permitted.

- 13) No development hereby permitted shall commence until a scheme for the construction of the site access and the off-site works of highway mitigation has been submitted to, and approved in writing by the Local Planning Authority. The highway works as indicated on drawing 001 Rev C shall include:

- **3m shared cycle/footway across the full site frontage and up to the junction with the D'Urton Lane (through route);**
- **Any other appropriate traffic management necessary for the proposed pedestrian/cycleway;**
- **Proposed** raised table junction with cycleway priority at the site access and D'Urton Yard; and
- **Proposed double yellow lines** - to extended double yellow lines on both sides of carriageway for the full length of the cul-de-sac section of D'Urton Lane.

The approved highway works shall be implemented prior to the first use of the development hereby permitted and thereafter retained.

- 14) No development hereby permitted shall commence until details of the means of protecting trees and hedges (including root structure within and immediately adjacent to the site) from injury or damage prior to or during the development works have been submitted to and approved in writing by the Local Planning Authority. Such protection measures shall be implemented in accordance with the approved details before any works are carried out, and retained during building operations and furthermore, no excavation, site works, trenches or channels shall be cut or laid or soil, waste or other materials deposited so as to cause damage or injury to the root structure of the trees or hedges.
- 15) Prior to the first use of the development hereby permitted a site-specific Operation and Maintenance Manual for the lifetime of the development, pertaining to the surface water drainage system and prepared by a suitably competent person, shall be submitted to and approved in writing by the Local Planning Authority. The details of the manual to be submitted for approval shall include, as a minimum:
- a) A timetable for its implementation;
 - b) Details of SuDS components and connecting drainage structures and maintenance, operational and access requirement for each component;
 - c) Pro-forma to allow the recording of each inspection and maintenance activity, as well as allowing any faults to be recorded and actions taken to rectify issues;
 - d) The arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme in perpetuity;

e) Details of financial management including arrangements for the replacement of major components at the end of the manufacturer's recommended design life;

f) Details of whom to contact in the event that pollution is seen in the system or if it is not working correctly; and

g) Means of access for maintenance and easements.

Thereafter the drainage system shall be retained, managed and maintained in accordance with the approved details.

- 16) Prior to the first use of the development hereby permitted a site-specific verification report, pertaining to the surface water drainage system and prepared by a suitably competent person, shall be submitted to and approved in writing by the Local Planning Authority. The verification report must, as a minimum, demonstrate that the sustainable drainage system has been constructed in accordance with the approved drawing(s) (or detail any minor variations) and is fit for purpose. The report shall contain information and evidence, including photographs, of details and locations (including national grid references) of critical drainage infrastructure (including inlets, outlets and control structures) and full as built drawings. The scheme shall thereafter be maintained in perpetuity.
- 17) Prior to the first use of the development hereby permitted, specific details of the proposed barrier/gate to the car park shall be submitted to and approved in writing by the Local Planning Authority. Any proposed barrier or gate erected at the access shall be positioned 5m behind the nearside edge of the highway (top of the ramp formed by highway turning head). The gates/barrier shall not open towards the highway. The development hereby permitted shall be carried out in accordance with the approved details prior to first use and thereafter retained.
- 18) Prior to the first use of the development hereby permitted, at least four parking bays must be marked out for use by electric vehicles only, together with a dedicated free standing weatherproof charger, charging infrastructure and cabling in accordance with details that have been previously submitted to, and approved in writing by, the Local Planning Authority. The electric vehicle charging points shall be retained for that purpose thereafter.
- 19) Prior to any above ground works commencing on the site, samples of the materials to be used in the construction of the external elevations of the proposed buildings shall be submitted to, and approved in writing by the Local Planning Authority. The development hereby permitted shall thereafter be carried out in accordance with the approved details.
- 20) Prior to the first use of the development hereby permitted, the car/vehicle parking area (and any associated turning space) shown on the approved plan ref: Proposed Site Plan dated November 2021 shall be completed. The parking (and manoeuvring) area(s) shall thereafter always remain available for parking of vehicles associated with the permitted use. Vehicle parking areas must be properly consolidated and surfaced in bound porous materials, (not loose stone, gravel or grasscrete) and subsequently retained for the lifetime of the development.

- 21) Prior to the first use of the development hereby permitted, the cycle parking provision shown on the approved plan ref: Proposed Site Plan dated November 2021 shall be completed. The area shall thereafter be kept free of obstruction and available for the parking of cycles only at all times.
- 22) The development hereby permitted by this planning permission shall be carried out in accordance with the principles set out within sustainable drainage strategy D3490-L-01 produced by PSA Design on 12th March 2021. The measures shall be fully implemented prior to the first use of the development and in accordance with the timing / phasing arrangements embodied within the scheme and thereafter maintained.
- 23) There shall be no connection between the drainage system of the site and the drainage system of the M55 motorway, nor shall there be any surface water runoff from the site onto the motorway or verge.
- 24) No external lighting column or other structure associated, other than the approved mosque and minaret itself, with this development hereby permitted shall be erected where any part of the structure is to be situated a distance from the motorway boundary that is less than the height of said structure above ground unless and until details of said structure have been submitted to and approved in writing by the Local Planning Authority in accordance with standard CG300 of the Design Manual for Roads and Bridges.

Details of external lighting (if any) for the remainder of the site shall be submitted alongside the landscaping details at reserved matters stage. Any approved external lighting details shall be implemented in accordance with the approved details and thereafter retained.
- 25) If during site preparation or development works, contamination is encountered or is suspected in areas where it had not been anticipated, then a scheme for detailed investigation, risk assessment, remediation and verification shall be submitted for the written approval of the Local Planning Authority prior to all but urgent remediation works necessary to secure the area. The remediation scheme shall be carried out in accordance with the approved details.
- 26) The rating levels of noise arising from the use of any plant or machinery associated with the development hereby permitted shall not exceed 10 decibels (measured in dB(A)) below the background noise level at the nearest noise sensitive premises to the proposed development, as assessed in accordance with British Standard 4142 (2014) (as amended).
- 27) No external amplified calls to prayer shall be made from the premises, no external speakers shall be installed at the premises and no calls to prayer or religious services shall be audible at any boundary of the site.
- 28) The premises shall be used for a mosque and for no other purpose (including any other purpose in Class F1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).



Department for Levelling Up, Housing & Communities

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RIGHT TO CHALLENGE THE DECISION IN THE HIGH COURT

These notes are provided for guidance only and apply only to challenges under the legislation specified. If you require further advice on making any High Court challenge, or making an application for Judicial Review, you should consult a solicitor or other advisor or contact the Crown Office at the Royal Courts of Justice, Queens Bench Division, Strand, London, WC2 2LL (0207 947 6000).

The attached decision is final unless it is successfully challenged in the Courts. The Secretary of State cannot amend or interpret the decision. It may be redetermined by the Secretary of State only if the decision is quashed by the Courts. However, if it is redetermined, it does not necessarily follow that the original decision will be reversed.

SECTION 1: PLANNING APPEALS AND CALLED-IN PLANNING APPLICATIONS

The decision may be challenged by making an application for permission to the High Court under section 288 of the Town and Country Planning Act 1990 (the TCP Act).

Challenges under Section 288 of the TCP Act

With the permission of the High Court under section 288 of the TCP Act, decisions on called-in applications under section 77 of the TCP Act (planning), appeals under section 78 (planning) may be challenged. Any person aggrieved by the decision may question the validity of the decision on the grounds that it is not within the powers of the Act or that any of the relevant requirements have not been complied with in relation to the decision. An application for leave under this section must be made within six weeks from the day after the date of the decision.

SECTION 2: ENFORCEMENT APPEALS

Challenges under Section 289 of the TCP Act

Decisions on recovered enforcement appeals under all grounds can be challenged under section 289 of the TCP Act. To challenge the enforcement decision, permission must first be obtained from the Court. If the Court does not consider that there is an arguable case, it may refuse permission. Application for leave to make a challenge must be received by the Administrative Court within 28 days of the decision, unless the Court extends this period.

SECTION 3: AWARDS OF COSTS

A challenge to the decision on an application for an award of costs which is connected with a decision under section 77 or 78 of the TCP Act can be made under section 288 of the TCP Act if permission of the High Court is granted.

SECTION 4: INSPECTION OF DOCUMENTS

Where an inquiry or hearing has been held any person who is entitled to be notified of the decision has a statutory right to view the documents, photographs and plans listed in the appendix to the Inspector's report of the inquiry or hearing within 6 weeks of the day after the date of the decision. If you are such a person and you wish to view the documents you should get in touch with the office at the address from which the decision was issued, as shown on the letterhead on the decision letter, quoting the reference number and stating the day and time you wish to visit. At least 3 days notice should be given, if possible.

APPENDIX 7:

06/2023/0030 – Policy Compliance Matrix

Appendix 7 – 06/2023/0030 Policy Compliance Matrix

Policy Reference	Policy Summary	Compliance
Central Lancashire Core Strategy (2012)		
<p>Policy 1 Locating Growth</p>	<p>Policy 1 seeks to focus growth and investment on well located brownfield sites and the Strategic Location of Central Preston, the Key Service Centres of Chorley and Leyland and the other main urban areas in South Ribble, whilst protecting the character of suburban and rural areas.</p> <p>It acknowledges that some Greenfield development will be required on the fringes of the main urban areas. To promote vibrant local communities and support services, an appropriate scale of growth and investment will be encouraged in identified Local Service Centres, providing it is in keeping with their local character and setting, and at certain other key locations outside the main urban areas.</p> <p>Strand (f) of the settlement hierarchy states that in other places, - smaller villages, substantially built-up frontages and Major Developed Sites - development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional reasons for larger scale redevelopment schemes.</p>	<p>It is acknowledged that the proposed development does not comply with Policy 1 of the CLCS insofar as it is not located on a brownfield site, nor within the Strategic Local of Central Preston or Key Service Centres of Chorley.</p> <p>The acceptability of the proposed development against Policy 1 is however disputed as Policy 1 does not explicitly prohibit development in Broughton for the character of development proposed.</p> <p>The proposed development is considered to accord with Policy 1.</p>
<p>Policy 3 Travel Policy</p>	<p>The core strategy travel policy promotes the most sustainable modes of transport encouraging walking, cycling, efficient public transport and managing car usage.</p> <p>It encourages new developments to provide safe pedestrian routes and cycleways. They should further link to local services such as public transport to promote sustainable modes of transport.</p>	<p>The proposed development is within walking distance of the centre of the Broughton settlement and its associated amenity offering, as well as key transport infrastructure. The proposed development also provides a direct link onto the Guild Wheel cycle route to the north.</p> <p>Further details of connectivity and means of promoting sustainable forms of travel would be provided at reserved matters stage.</p> <p>It should be noted that no objections were received in respect of the proposed development from LCC or National Highways.</p> <p>The proposed development therefore accords with Policy 3.</p>

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<p>Policy 4</p> <p>Housing Delivery</p>	<p>Policy 4 sets out the minimum requirements for new homes, as follows:</p> <p>Preston – 500 dwellings per annum South Ribble – 417 dwellings per annum Chorley – 417 dwellings per annum</p> <p>It sets out that prior under-provision of 702 dwellings will also be made up over the remainder of the plan period equating to a total of 22,158 dwellings over the 2010-2026 period.</p>	<p>This policy is out of date as established through various appeal decisions and as acknowledged within the Planning Committee Report.</p> <p>The Standard Method therefore applies and is the principle means of reference for housing need at present.</p> <p>Policy 4 is out-of-date.</p>
<p>Policy 5</p> <p>Housing density</p>	<p>Density is a key consideration for new development proposals, and it is important that the proposal matches and responds to the character and landscape of the area, while maintaining high quality.</p> <p>It sets out that it is important to consider the sustainability of the land. There should be no detrimental impact on the on the amenity, character, appearance, distinctiveness, and environmental quality of the area.</p>	<p>The proposed development sits at circa 19 dwellings per hectare. No objection was received from the PCC's Landscape Architect nor was it raised as an issue within the Planning Committee Report and therefore it is considered that the proposed density is appropriate and thus compliant.</p> <p>The proposed development therefore accords with Policy 5.</p>
<p>Policy 6</p> <p>Housing Quality</p>	<p>The design of new development housing should be high quality, sustainable and functional and set a good standard for the community and environment. This will be achieved by:</p> <ul style="list-style-type: none"> (a) Targeting housing improvements in areas of greatest need ie Inner East Preston, and combine this intervention with wider regeneration initiatives such as in Leyland town centre; (b) Encouraging the re-use of empty housing for residential purposes through either their re-occupation or conversion including sub-division and amalgamation into other types of housing or to allow a change to other uses complementary to the residential area; (c) Facilitating the greater provision of accessible housing and neighbourhoods and use of higher standards of construction. 	<p>Strands (a) and (b) are not applicable in this instance. However the proposed development does seek to provide a significant quantum of accessible and adaptable housing, and would seek to deliver high quality homes, meeting and exceeding applicable standards where possible.</p> <p>Further details in respect of housing quality would be provided at reserved matters stage.</p> <p>The proposed development therefore accords with Policy 6.</p>
<p>Policy 7</p>	<p>Policy 7 sets out how sufficient provision of affordable and special housing to meet identified needs will be delivered.</p>	<p>The proposed development seeks to provide 40% of the total number of homes as affordable on-site. The Planning Committee Report acknowledges that this meets and exceeds policy requirements.</p>

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<p>Affordable and special needs housing policy</p>	<p>(a) Subject to such site and development considerations as financial viability and contributions to community services, to achieve a target from market housing schemes of 30% in the urban parts of Preston, South Ribble and Chorley, and of 35% in rural areas on sites in or adjoining villages which have, or will have, a suitable range of services; on any rural exception sites including those in the Green Belt there will be a requirement of 100%.</p> <p>(b) Aside from rural exception sites the minimum site size threshold will be 15 dwellings (0.5 hectares or part thereof) but a lower threshold of 5 dwellings (0.15 hectares or part thereof) is required in rural areas.</p> <p>(c) Where robustly justified, off-site provision or financial contributions of a broadly equivalent value instead of on-site provision will be acceptable where the site or location is unsustainable for affordable or special housing.</p> <p>(d) Special needs housing including extra care accommodation will be required to be well located in communities in terms of reducing the need to travel to care and other service provision and a proportion of these properties will be sought to be affordable subject to such site and development considerations as financial viability and contributions to community services.</p> <p>(e) Special needs housing including extra care accommodation will be required to be well located in communities in terms of reducing the need to travel to care and other service provision and a proportion of these properties will be required to be affordable.</p>	<p>In respect of special needs housing, the proposed development also seeks to provide housing for over 55s, housing for BAME households and accessible and adaptable homes. This is to meet an identified need in a highly sustainable location which has significant local amenity provision (as well as being in close proximity to the city of Preston) to negate the need to travel larger distances for end users.</p> <p>The proposed development meets and exceeds the requirements of Policy 7 and is therefore wholly in accordance with it.</p>
<p>Policy 14 Education Policy</p>	<p>New developments should consider nearby school capacities, to ensure there are sufficient places in schools to accommodate additional children. It sets out that developments should contribute to the provision of school places if the development will affect the current capacity at existing schools.</p>	<p>The Appellant is committed to entering into a suitably worded S106 Agreement to secure a financial contribution towards 19 primary school places and 8 secondary school places in line with Policy 14.</p> <p>The proposed development is therefore in accordance with Policy 14.</p>
<p>Policy 16 Heritage Assets</p>	<p>New developments should protect and seek opportunities to enhance the historic environment and heritage assets.</p>	<p>The Planning Committee Report confirms that the proposed scheme would comply with Policy 16, subject to the conditioning of the</p>

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	They should support development that protects and enhances the local character and history and improve assets that are in poor condition or at risk.	parameters plan to ensure the mitigation measures are delivered as presented. The proposed development therefore fully complies with Policy 16.
Policy 17 Design of new buildings policy	In considering development proposals, new development building designs will take account of the character and appearance of the local area. Where it can, development will avoid harm to the amenities of the local area and enhance the public space for land users and occupiers.	The application was submitted in outline with all matters reserved except for access. Full details of the design of the new homes would be provided at reserved matters stage. Notwithstanding the above, the proposed development detailed design will take into account the character and appearance of the local area and will provide public open space in line with the submitted parameter plan. The proposed development fully complies with Policy 16.
Policy 18 Green infrastructure	Development will be expected to protect and improve the natural environment to keep the network of green infrastructure. Where development may cause loss or damage to the green infrastructure network, the council will require compensation to be provided or mitigation to be secured.	The current condition of the site is noted and the key green characteristics will be retained and enhanced as part of the proposals to preserve the network of green infrastructure. The provision of public open space and the delivery of a 33% biodiversity net gain (against the 2.0 Metric Calculator) across the site will further reinforce the landscape-first approach to the proposed development design. The proposed development therefore accords with Policy 18.
Policy 19 Areas of separation and major open space	In considering development proposals the council must consider the designated areas of separation and major open space in order to maintain the openness of the countryside and prevent coalescence between settlements in the area. This policy applies to all forms of development. Areas of Separation will be designated around the following northern settlements: (a) Broughton; (b) Goosnargh/Whittingham; and (c) Grimsargh;	The Planning Committee report confirms that the proposed development would not compromise the Area of Separation gap and therefore would preserve the identity and distinctiveness of the village of Broughton. The Landscape Design Officer raised no objection to the proposed development on the grounds of Policy 19. The proposed development therefore accords with Policy 19.

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<p>Policy 21</p> <p>Landscape Character Areas</p>	<p>In considering development proposals the council will require that new development is appropriate to the landscape character and positively contributes towards its preservation, improvement, or the addition of new features.</p>	<p>The Planning Committee Report confirms that the proposed development would not have a significant adverse impact on the landscape character of the area due to the sites containment visually as well as other site-specific conditions.</p> <p>The proposed development therefore accords with Policy 21.</p>
<p>Policy 22</p> <p>Biodiversity and geodiversity</p>	<p>In considering development proposals the council will require that the biological and geological assets of the area be conserved and protected. This will be achieved by:</p> <ul style="list-style-type: none"> (a) Promoting the conservation and enhancement of biological diversity, having particular regard to the favourable condition, restoration and re-establishment of priority habitats and species populations; (b) Seeking opportunities to conserve, enhance and expand ecological networks; (c) Safeguarding geological assets that are of strategic and local importance. 	<p>No objection was received from Greater Manchester Ecology Unit in respect of the ecological inputs submitted as part of the application. Suitably worded conditions were recommended.</p> <p>Further details in respect of biodiversity and geodiversity enhancements to be integrated into the proposed development would be provided at reserved matters stage.</p> <p>The proposed development therefore accords with Policy 22.</p>
<p>Policy 26</p> <p>Crime and Community Safety</p>	<p>Development will be expected to improve community safety and plan for reduced levels of crime. Development can play a part in crime prevention by adhering to 'secured by design' principles, which focus on factors such as natural surveillance and lighting.</p> <p>Furthermore, to reduce anti-social behaviour, development can provide leisure and community activities. New development should consider cooperation between various agencies to enhance safety and well-being.</p>	<p>No objections were received in respect of the proposed development regarding Policy 26.</p> <p>The application was submitted in outline with all matters reserved except for access. Full details of the design of the new homes from a crime and community perspective would be provided at reserved matters stage. The intention is to work to 'secured by design' principles.</p> <p>The proposed development therefore accords with Policy 26.</p>
<p>Policy 27</p> <p>Sustainable resources and new developments</p>	<p>Development will be expected to incorporate sustainable resources. Planning permission for new built development will only be granted on proposals for 5 or more dwellings or non-residential units of 500sqm or more where all of the following criteria are satisfied:</p> <ul style="list-style-type: none"> (a) Evidence is set out to demonstrate that the design, orientation and layout of the building minimises energy use, maximises energy efficiency and is flexible enough to withstand climate change; (b) appropriate decentralised, renewable or low carbon energy sources are installed and implemented to reduce 	<p>The application was submitted in outline with all matters reserved except for access. Full details of the design of the new homes and wider site from a sustainable resource perspective would be provided at reserved matters stage.</p> <p>The intention is to design new homes to meet the new Part L reductions in CO2 emissions.</p> <p>The proposed development therefore accords with Policy 27 in its intent.</p>

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	<p>the carbon dioxide emissions of predicted energy use by at least 15%;</p> <p>(c) Appropriate storage space is to be provided for recyclable waste materials and composting;</p>	
Policy 29 Water management	Development should improve water quality, water management and reduce the risk of flooding, integrating <i>inter alia</i> sustainable urban drainage systems and maximisation of green infrastructure to contribute to flood relief.	<p>The LLFA initially objected but following the issue of revised information pertaining to the drainage strategy, the objection was removed.</p> <p>The proposed development is therefore in accordance with Policy 29.</p>
Policy 30 Air Quality	Policy 30 sets out that to improve air quality, delivery of green infrastructure initiatives will be encouraged in tandem with prioritisation of measures to reduce road traffic congestion.	<p>The proposed development will seek to promote active and sustainable forms of transport to deter car reliance for future residents. Full details of the means by which this will be achieved would be provided at reserved matters stage.</p> <p>PCC's environmental health officer did not object to the proposed development on air quality grounds.</p> <p>The proposed development is therefore in accordance with Policy 30.</p>
Policy 31 Agricultural Land	Policy 31 seeks to protect the best and most versatile agricultural land from irreversible damage to the soil.	<p>The application site is grade 3b agricultural land. The Planning Committee Report confirms that the proposed development would not lead to the loss of the highest value of agricultural land.</p> <p>The proposed development is therefore in accordance with Policy 31.</p>
Preston Local Plan (2015)		
Policy AD1 (a) Development within (or in close proximity to) the Existing Residential Area	<p>Development will be permitted provided that it meets the criteria listed below:</p> <ul style="list-style-type: none"> a) the design and scale of development is sensitive to, and in keeping with, the character and appearance of the area; b) there would be no adverse impact on residential amenity, particularly by reason of noise, general disturbance and loss of privacy due to the activity under consideration or the vehicular/pedestrian movement it generates; c) the proposal would not lead to an over-concentration of non-residential uses, detrimental to residential character and amenity, and; d) the proposal would not lead to an over-intensification of use of the site. 	<p>AD1 is shown on the Preston Proposals Map as covering the settlement area of Broughton.</p> <p>It is common ground that the proposals do not conflict with AD1.</p>

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Policy AD1 (b)	Development within Existing Villages (including the development of brownfield sites) will also be permitted provided that it meets with the criteria above. In all cases, favourable consideration will be given to proposals containing measures likely to result in an overall improvement to the environment and amenity of the area.	
Policy ST1 Parking Standards	Developments shall provide car parking in accordance with the parking standards adopted by the council.	No objection on parking grounds was received from LCC or National Highways. Full details in respect of the proposed parking provision would be provided at reserved matters stage and will be designed to the Council's adopted standards. The proposed development is therefore in accordance with Policy ST1.
Policy ST2 General Transport Considerations	All development proposals will need to demonstrate that: (a) road safety and the efficient and convenient movement of all highway users (including bus passengers, cyclists, pedestrians and equestrians) is not prejudiced; (b) appropriate provision is made for public transport services; (c) appropriate measures are included to facilitate access on cycle or foot; (d) where practicable, ensure existing pedestrian, cycle and equestrian routes are protected and extended; (e) the needs of disabled people are fully provided for; (f) corridors which could be developed as future transport routes (e.g. disused railway lines) are not prejudiced.	The proposed development is within walking distance of the centre of the Broughton settlement and its associated amenity offering, as well as key transport infrastructure. The proposed development also provides a direct link onto the Guild Wheel cycle route to the north. Further details of connectivity and means of promoting sustainable forms of travel would be provided at reserved matters stage. It should be noted that no objections were received in respect of the proposed development from LCC or National Highways. The proposed development is therefore in accordance with Policy ST2.
Policy EN1 Development in the Open Countryside	PCC will not permit proposals which go against open countryside policy. Development is to be limited to: - That needed for purposes of agriculture or forestry or uses appropriate to diversify the rural economy. - The re-use or re-habitation of existing buildings - Infilling within groups of buildings in smaller rural settlements	It is acknowledged that the proposed development conflicts with Policy EN1 in respect of the types of development thought to be acceptable within Open Countryside. It is accepted that the proposed development conflicts with Policy EN1, however Policy EN1 is to be afforded limited weight if applied correctly alongside CLCS Policy 1 provisions.
Policy EN2 Protection and enhancement of green infrastructure	Development proposals should seek to protect and enhance existing green infrastructure as identified on the Policies Map. Proposals which would involve the loss of green infrastructure will only be granted planning permission where: a) it can be clearly shown that the site is surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or	The proposed development seeks to protect and enhance the existing green infrastructure associated with the site. No conflict with Policy EN2 is identified within the Planning Committee Report. The proposed development is therefore in accordance with Policy EN2.

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	<p>c) the development itself is for alternative green infrastructure provision, the needs for which clearly outweigh the loss; and</p> <p>d) policy EN10 is adhered to where the site is part of an ecological network.</p>	
<p>Policy EN4</p> <p>Areas of Separation</p>	<p>Areas of Separation, shown on the Policies Map, are designated between:</p> <ul style="list-style-type: none"> • Broughton and the Preston Urban Area • Goosnargh Whittingham and Grimsargh • Grimsargh and the Preston Urban Area <p>Development will be assessed in terms of its impact upon the Area of Separation including any harm to the effectiveness of the gap between settlements and, in particular, the degree to which the development proposed would compromise the function of the Area of Separation in protecting the identity and distinctiveness of settlements.</p>	<p>The Planning Committee report confirms that the proposed development would not compromise the Area of Separation gap and therefore would preserve the identity and distinctiveness of the village of Broughton.</p> <p>The Landscape Design Officer raised no objection to the proposed development on the grounds of Policy 19.</p> <p>The proposed development is therefore in accordance with Policy EN4.</p>
<p>Policy EN7</p> <p>Land Quality</p>	<p>New development should demonstrate that:</p> <p>a) any existing contamination of the land will be addressed by appropriate mitigation measures to ensure that the site is suitable for the proposed use and that there is no unacceptable risk of pollution within the site or in the surrounding area; and</p> <p>b) the proposed development will not cause the land to become contaminated, to the detriment of future use or restoration of the site or so that it would cause pollution in the surrounding area. 1</p>	<p>The preliminary Phase 1 Desk Study recommends a Phase 2 intrusive geo-environmental site investigation. The Planning Committee Report confirms this investigation can be secured via condition and therefore there is no conflict with Policy EN7.</p> <p>The proposed development is therefore in accordance with Policy EN7.</p>
<p>Policy EN8</p> <p>Development and Heritage Assets</p>	<p>Policy EN8 states that proposals affecting a heritage asset or its setting will be permitted where they make a positive contribution to the character and local distinctiveness through high quality new design that responds to its context, are accompanied by a satisfactory Heritage Statement that fully explains the impact of the proposal on the significance of the heritage asset and sustain, conserve and, where appropriate enhance the significance, appearance, character and setting of the heritage asset itself and the surrounding historic environment.</p>	<p>The Planning Committee Report confirms that the proposed scheme would comply with Policy EN8, subject to the conditioning of the parameters plan to ensure the mitigation measures are delivered as presented.</p> <p>The proposed development is therefore in accordance with Policy EN8.</p>

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<p>Policy EN9</p> <p>Design of New Development</p>	<p>Policy EN9 of the Adopted Local Plan states that all new development proposals should be designed with regard to the principles set out and explained in the Central Lancashire Design Guide SPD, which are movement and legibility; mix of uses and tenures; adaptability and resilience; resources and efficiency; architecture and townscape.</p>	<p>The application was submitted in outline with all matters reserved except for access. Full details of the design of the new homes would be provided at reserved matters stage.</p> <p>Notwithstanding the above, the proposed development detailed design will take into account the character and appearance of the local area and will provide public open space in line with the submitted parameter plan.</p> <p>The proposed development is therefore in accordance with Policy EN9.</p>
<p>Policy EN10</p> <p>Biodiversity and Nature Conservation</p>	<p>In Preston, Biodiversity and Ecological Network resources will be protected, conserved, restored and enhanced:</p> <p>Priority will be given to (inter alia)</p> <ul style="list-style-type: none"> - The ecology of the site and the surrounding area (safeguarding existing habitats/features such as but not exclusive to trees, hedgerows, ponds and streams), unless justified otherwise. - When considering applications for planning permission, protecting, conserving, restoring and enhancing Preston's ecological network and providing links to the network from and/or through the proposed development site. <p>In additional developments must adhere to the following provisions:</p> <ul style="list-style-type: none"> a. The production of a net gain in biodiversity where possible by designing in wildlife and by ensuring that any adverse impacts are avoided or if unavoidable are reduced or appropriately mitigated and/or compensated; b. The provision of opportunities for habitats and species to adapt to climate change; c. The support and encouragement of enhancements which contribute to habitat restoration; d. Where there is reason to suspect that there may be protected habitats/ species on or close to a proposed development site, the developer will be expected to carry out all necessary surveys in the first instance; planning 	<p>No objection was received from Greater Manchester Ecology Unit in respect of the ecological inputs submitted as part of the application. Suitably worded conditions were recommended.</p> <p>Further details in respect of biodiversity and geodiversity enhancements to be integrated into the proposed development would be provided at reserved matters stage.</p> <p>The current condition of the site is noted and the key green characteristics will be retained and enhanced as part of the proposals to preserve the network of green infrastructure.</p> <p>The provision of public open space and the delivery of a 33% biodiversity net gain across the site will further reinforce the landscape-first approach to the proposed development design.</p> <p>The proposed development is therefore in accordance with Policy EN10.</p>

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	<p>applications must then be accompanied by a survey assessing the presence of such habitats/species and, where appropriate, make provision for their needs;</p> <p>e. In exceptional cases, where the need for development in social or economic terms is considered to significantly outweigh the impact on the natural environment, appropriate and proportionate mitigation measures and/or compensatory habitat creation and/or restoration of at least equal area, quality and diversity will be required through planning conditions and/or planning obligations.</p>															
<p>Policy EN11</p> <p>Species Protection</p>	<p>Policy EN11 states that planning permission will not be granted for development which would have an adverse effect on a protected species unless the benefits of the development outweigh the need to maintain the population of the species in situ. Should development be permitted that might have an effect on a protected species planning conditions or agreements will be used to:</p> <p>a) Facilitate the survival of the individual species affected;</p> <p>b) Reduce the disturbance to a minimum; and</p> <p>c) Provide adequate alternative habitats to sustain the viability of the local population of that species.</p>	<p>The proposed development would not have an adverse effect on protected species. All required mitigation measures will be put in place to ensure ongoing protection during construction phases, with creation of new habitats forming part of future reserved matters applications.</p> <p>The proposed development is therefore in accordance with Policy EN11.</p>														
<p>Policy HS3</p> <p>Green Infrastructure in New Housing Developments</p>	<p>All new residential development resulting in a net gain of dwellings will be required to provide sufficient public open space to meet the recreational needs of the development, in accordance with the standards set out below:</p> <table border="1" data-bbox="349 1062 1196 1469"> <thead> <tr> <th>Typology</th> <th>Provision Standard</th> </tr> </thead> <tbody> <tr> <td>Parks, gardens</td> <td>1.81ha per 1000 population</td> </tr> <tr> <td>Semi-natural greenspace</td> <td>1.78ha per 1000 population</td> </tr> <tr> <td>Amenity greenspace</td> <td>0.54ha per 1000 population</td> </tr> <tr> <td>Provision for children and young people</td> <td>0.02ha per 1000 population</td> </tr> <tr> <td>Allotments</td> <td>0.17ha per 1000 population</td> </tr> <tr> <td>Playing pitches</td> <td>1.01ha per 1000 population</td> </tr> </tbody> </table>	Typology	Provision Standard	Parks, gardens	1.81ha per 1000 population	Semi-natural greenspace	1.78ha per 1000 population	Amenity greenspace	0.54ha per 1000 population	Provision for children and young people	0.02ha per 1000 population	Allotments	0.17ha per 1000 population	Playing pitches	1.01ha per 1000 population	<p>The proposed development integrates 1.62 hectares of public open space and landscaping.</p> <p>The Planning Committee Report raises no issues with the proposed development's provision of such space against their standards as set out in Policy HS3.</p> <p>The proposed development is therefore in accordance with Policy HS3.</p>
Typology	Provision Standard															
Parks, gardens	1.81ha per 1000 population															
Semi-natural greenspace	1.78ha per 1000 population															
Amenity greenspace	0.54ha per 1000 population															
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Broughton-in-Amounderness Neighbourhood Plan		
Policy NE2 Visual Impact of New Development	The visual impact of new development particularly that on the edge of the defined settlement of Broughton when viewed from approaching routes should be minimised by landscape screening and tree planting.	No objection was received from PCC's Landscape Officer in respect of the visual impact of the proposed development. The proposed development is therefore in accordance with Policy NE2.
Policy RES1 Broughton Village – Housing Development Sites as an extension to the defined settlement boundary.	Small-scale housing developments will be permitted on the following sites, as a rounding off of the village form, within an extended village settlement boundary, as shown on the Plan below. <ol style="list-style-type: none"> 1. 522 Garstang Road - field to front of bungalow – 1.45 has 2. Park House and disused former football field to the east and to the south and east of Broughton District Sports and Social Club - 1.5 has 3. Land to east and South of Broughton District Sports and Social Club-0.75 has <p>Other proposed development within designated Open Countryside will be heavily restricted in accordance with Central Lancashire Core Strategy Policies 1 and 19 and Preston Local Plan Policies EN1 and EN4.</p>	It is acknowledged that the proposed development conflicts with Policy RES1 as it does not comprise 1 of the 3 sites identified for development. The issue of 'rounding off' is however in dispute as the proposed development follows the form of recent approvals in the vicinity of the site that have been implemented but sit at odds with the rounding off approach set out within the Neighbourhood Plan. It is acknowledged that the proposed development conflicts with Policy RES1 insofar as it is not allocated for development, however Policy RES1 is to be afforded limited weight if applied correctly alongside CLCS Policy 1 provisions.
Policy RES2 Broughton Village Housing Mix	Residential development of more than 10 dwellings shall provide a range of housing to meet local needs as identified in the latest objective assessment of local housing needs.	The proposed development seeks to provide 40% of the total number of homes as affordable on-site. The Planning Committee Report acknowledges that this meets and exceeds policy requirements. In respect of special needs housing, the proposed development also seeks to provide housing for over 55s, housing for BAME households and accessible and adaptable homes. This is to meet an identified need in a highly sustainable location which has significant local amenity provision (as well as being in close proximity to the city of Preston) to negate the need to travel larger distances for end users. The proposed development therefore accords with Policy RES2.
Policy NE3 Drainage	Sustainable drainage schemes shall be used to drain land wherever possible: <ul style="list-style-type: none"> - For development - where waterlogging is an obstacle to use of public open spaces or to enjoyment and use of public rights of way 	The proposed development will integrate sustainable urban drainage systems to manage surface run-off and provide betterment overall. The proposed development therefore accords with Policy NE3.

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<p>Policy CF1</p> <p>Guild Wheel, Public Footpaths and Bridleways</p>	<p>- to provide wildlife areas.</p> <p>Development which impacts on the Guild Wheel, public footpaths and bridleways shall not have a detrimental impact on the safety of users or the landscape setting of these routes.</p> <p>Proposals which improve these facilities and benefit users will be supported in principle.</p>	<p>The proposed development includes a direct link to the Guild Wheel to the north. No Public Rights of Way are impinged by the proposed development.</p> <p>The proposed development therefore accords with Policy CF1.</p>
<p>Central Lancashire Design Guide SPD</p>		
<p>The Central Lancashire Design Guide provides an overview of the design principles that the Central Lancashire authorities will employ when considering planning proposals. A key objective of the SPD is to raised the level and quality of design of new buildings within the built environment across Central Lancashire and in so doing reinforce its unique character. It sets a benchmark for design quality by endorsing best practice and requiring new development to enhance the character of the area through good design.</p> <p>The Design Guide seeks to achieve this by 6 key design principles, as follows:</p> <ol style="list-style-type: none"> 1. Movement and legibility – A place that is easy to get to, move through and is easy to understand 2. Space and enclosure – A place with attractive, sustainable and successful outdoor areas where public and private spaces are clearly distinguished 3. Mix of Uses and Tenures – A development that promotes a variety and choice in terms of uses and ownerships in respect to local needs 4. Adaptability and resilience – A development that can adapt and respond to changing economic, social and technological conditions 5. Resources and efficiency – How the development contributes to tackling climate change and adapting to and mitigating its effects both in its construction and operation 6. Architecture and Townscape - A development that responds positively to its surrounding environment through its external appearance and form 	<p>The application was submitted in outline with all matters reserved except for access.</p> <p>The submitted parameters plan sets out the overarching principles to be adhered to in respect of layout and access and egress to / from the site.</p> <p>Full details in respect of the proposed development against the key design principles would be provided as part of a reserved matters submission. It is the intention to design the proposed development to these standards.</p> <p>The proposed development will therefore accord with this SPD.</p>	
<p>Central Lancashire Affordable Housing SPD</p>		
<p>The purpose of this SPD is to provide advice on how the Councils' affordable housing policy, as set out in DPDs, is to be implemented. This includes guidance on a range of approaches, standards and mechanisms required to deliver a range of affordable housing to meet local needs.</p>	<p>The proposed development delivers 40% affordable housing in a range of types and tenures. This exceeds the adopted policy requirements.</p>	

Appendix 7 – 06/2023/0030 Policy Compliance Matrix

	<p>The proposed development will therefore accord with this SPD.</p>
<p>Central Lancashire Employment Skills SPD</p>	
<p>One of Central Lancashire's priorities is to encourage economic growth within Central Lancashire that benefits the people and businesses in the three boroughs. The SPD seeks to:</p> <ul style="list-style-type: none"> • Increase employment opportunities by helping local businesses to improve, grow and take on more staff • Help businesses to find suitable staff and suppliers, especially local ones • Improve the skills of local people to enable them to take advantage of the resulting employment opportunities • help businesses already located in Central Lancashire to grow and attract new businesses into the area 	<p>The Appellant is committed to entering into a suitably worded S106 Agreement to secure an Employment and Skills Plan.</p> <p>The proposed development will therefore accord with this SPD.</p>
<p>Central Lancashire Open Space and Playing Space Strategy</p>	
<p>The purpose of this SPD is to provide advice on how the Councils' open space and playing pitch policies, as set out in the Local Plans, are to be implemented. This includes guidance on provision standards and how they will be applied. It sets out that all new residential development will be required to contribute towards open space and playing pitch provision with the exception of the following: nursing / rest homes; sheltered accommodation; and replacement dwellings.</p> <p>The SPD sets out the methodology for calculating the contribution requirements or quantum of open space to be provided on site.</p>	<p>The proposed development integrates 1.62 hectares of public open space and landscaping.</p> <p>The Planning Committee Report raises no issues with the proposed development's provision of such space against their standards.</p> <p>The proposed development will therefore accord with this SPD.</p>

APPENDIX 8:

PCC Housing Needs & Demand Assessment (Arc4) (2022)

Housing Need and Demand Assessment 2022

Preston City Council

Final Report
December 2022

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Please note that in this report some of the tables include rounded figures. This can result in some column or row totals not adding up to 100 or to the anticipated row or column 'total' due to the use of rounded decimal figures. We include this description here as it covers all tables and associated textual commentary included. If tables or figures are to be used in-house then we recommend the addition of a similarly worded statement being included as a note to each table used.

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Executive Summary

Introduction

The City of Preston Housing Need and Demand Assessment (HNDA) 2022 provides the Council with up to date evidence on housing need across all sections of the community over the period 2021 to 2038. The evidence will inform the update of the Central Lancashire joint Local Plan, other strategies, policies and decisions of the council and its partners.

The HNDA has been prepared in accordance with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).

This report has been prepared during the COVID-19 pandemic. The impact this may have on population projections, the economy and dwelling need will emerge in due course.

Data have been produced at settlement/parish level where possible.

The HNDA report complements the Central Lancashire Housing Needs Assessment prepared by DLP Planning and Edge Analytics. The objective of the study is to identify the level and distribution of future housing needs across Central Lancashire for the period 2023 to 2038 and provides a robust and up to date evidence base to inform the emerging Central Lancashire Local Plan.

Dwelling stock

There are an estimated 65,220 dwellings and 58,524 households across the city in 2021. The vacancy rate is 4.3% which is higher than the rate for England (2.7%). Most dwellings are houses (73.7%), 20.1% are flats and 6.2% are bungalows. 67.1% of households are owner occupiers, 12% privately rent and 20.9% live in affordable housing. There are around 515 affordable home ownership properties in the City of Preston.

House prices and rents

In 2020, lower quartile prices were £98,000 (North West £119,500 and England £164,000) and median prices were £150,000 (North West £170,000 and England £249,000).

In 2020, lower quartile private rents were £494 each month (£524 North West and England £724) and median rents were £594 (North West £676 England £1,148).

Future dwelling mix and development priorities

The HNDA has carefully considered the future population and household projections over the period 2021 to 2038, the range of dwellings lived in by different households and their dwelling aspirations (likes) and expectations. This helps to determine an appropriate mix of dwellings to inform future development priorities to better reflect the housing needs of communities across the City of Preston.

The Central Lancashire Housing Needs Assessment calculates housing need across Central Lancashire. This study establishes an annual need for 490 dwellings across the City of Preston over the plan period.

There is an annual need for 395 affordable homes each year across the city which justifies the need for a robust affordable housing policy. Planning Practice Guidance is clear that it expects councils to facilitate the delivery of affordable housing to help meet identified need but as actual delivery is subject to economic viability, not all of this identified need is expected to be met or indeed is often possible to be met.

An overall affordable tenure split for new affordable housing is 88% rented and 12% affordable home ownership. If First Homes is considered, the overall tenure split adjusts to 68% rented and 32% affordable home ownership. The shift towards home ownership reflects the impact of First Homes on overall tenure split and a specific need for affordable home ownership products evidenced in the 2021 household survey.

Given the level of affordable need, the Local Plan needs a robust affordable housing policy setting out targets and tenure split which takes into account First Homes. The affordable housing policy will continue to support the ongoing delivery of affordable housing and diversify the affordable products available to local residents to reflect identified needs. The analysis has shown a specific need for bungalow/level-access affordable rented dwellings.

The overall dwelling mix recommendations by tenure are set out in Table ES1.

Table ES1 Summary of overall dwelling mix by tenure

Dwelling type/size	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1-bedroom house	0-2%	2-5%	0-2%	0-2%
2-bedroom house	10-15%	20-25%	10-15%	15-20%
3-bedroom house	35-40%	20-25%	25-30%	35-40%
4 or more-bedroom house	15-20%	5-10%	30-35%	20-25%
1-bedroom flat	0-2%	10-15%	2-5%	5-10%
2-bedroom flat	0-2%	15-20%	5-10%	5-10%
3 or more -bedroom flat	0-2%	0-2%	0-2%	2-5%
1-bedroom bungalow/level-access	2-5%	10-15%	0-2%	0-2%
2-bedroom bungalow/level-access	10-15%	5-10%	5-10%	5-10%
3 or more-bedroom bungalow/level-access	10-15%	2-5%	5-10%	5-10%
Dwelling type	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
House	70-75%	50-55%	75-80%	70-75%
Flat	2-5%	25-30%	5-10%	15-20%
Bungalow/level-access	25-30%	15-20%	10-15%	5-10%
Number of bedrooms	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1	5-10%	20-25%	2-5%	10-15%
2	25-30%	40-45%	25-30%	25-30%
3	50-55%	20-25%	35-40%	40-45%
4	15-20%	5-10%	30-35%	20-25%

Regarding student housing, any future purpose-built student housing needs to be carefully considered by the council and the University of Central Lancashire and should be to address gaps in quality of provision rather than to meet a growing student demand.

The needs of other groups

Particular needs which have been identified in the HNDA are:

- Increasing and diversifying the supply of specialist housing for older people. There is a need for 1,903 more units of accommodation for older people by 2038. This includes sheltered/retirement, Extra Care, co-housing and residential care.
- There is a specific need from BAME households, particularly from Asian community households who need larger dwellings.
- Based on an assessment of additional needs and longer-term demographics, 4% of new dwellings (20 each year) should be built to M4(3) wheelchair accessible standard; and all other new dwellings should be built to M4(2) accessible and adaptable standard.

The Lancashire Market Position Statement includes the following housing priorities:

- Less reliance on residential care and more Extra Care schemes;
- Improved Supported Living options for younger adults
- More bespoke options including Shared Lives including Home Share which enables people who need support to live in a family setting.

Note that there is overlap between affordable, specialist older person and M4(3) need, so for instance the development of an older person's level access, wheelchair accessible affordable dwelling would help address three aspects of housing need.

Summary of policy recommendations

Theme	Data	Action
Overall housing need	490 each year 2023-2038 based on Central Lancashire Housing Needs Assessment	Housing need figure to be noted
Affordable housing need	Annual imbalance of 395 which justifies need for robust affordable housing policy and delivery	Affordable housing policy to maximise delivery on market sites subject to viability and consider new ways of delivering affordable, particularly social rented housing.
	Affordable tenure mix of 88% rented and 12% affordable home but if First Homes are included the tenure split is 68% rented and 32% affordable home ownership	Impact of First Homes needs careful evaluation and methods to maximise social rented housing to be considered
Needs of different groups	4% of new dwellings to be M4(3) wheelchair accessible All new affordable and market dwellings to be built to M4(2) standard	Update relevant policies
	1,903 additional units of accommodation for older people by 2038 or 106 each year	Diversify range of older persons accommodation including sheltered/retirement, Extra Care and cohousing. Continue to review need for residential care Strengthen policies to enable people to live in their own homes for longer with appropriate support and adaptation

Theme	Data	Action
	There is a specific need from BAME households, particularly Asian community households for larger dwellings	7.5% of new affordable dwellings should have 4 bedrooms and 1.1% have 5 or more bedrooms to meet the needs of larger families, particularly those from the Asian community.
	Other needs groups	Ongoing review of need for specialist housing and build upon the needs evidence in this HNDS

1. Introduction

Background, aims and objectives

- 1.1 The City of Preston Need and Demand Assessment (HNDA) 2022 provides the Council with up to date evidence on housing need across all sections of the community over the period 2021 to 2038. A similar study has been prepared for Chorley Borough Council and South Ribble Borough Council. The evidence will inform the update of the Central Lancashire joint Local Plan, other strategies, policies and decisions of the council and its partners. The study builds upon the findings of the Central Lancashire Housing study 2020 which provided a strategic overview of housing need across the three districts of Preston, Chorley and South Ribble.
- 1.2 The HNDA report complements the Central Lancashire Housing Needs Assessment prepared by DLP Planning and Edge Analytics. The objective of the study is to identify the level and distribution of future housing needs across Central Lancashire for the period 2023 to 2038 and provides a robust and up to date evidence base to inform the emerging Central Lancashire Local Plan.

National Planning Policy Framework

- 1.3 The evidence base needs to take account of the requirements of the National Planning Policy Framework (NPPF). The latest version was published in July 2021 and supported by Planning Practice Guidance (PPG). The NPPF 2021 sets out the government's planning policies for England and how these are expected to be applied. Paragraph 11 of the NPPF states that plans, and decisions should apply a **'presumption in favour of sustainable development'**. As part of this, in relation to plan-making, it sets out that this means that **'strategic policies should, as a minimum, provide for objectively assessed needs for housing...'**
- 1.4 Paragraph 60 provides an important context to the policy for housing delivery, as follows:
'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'
- 1.5 Paragraphs 61 to 63 relate to the evidence base requirements which underpin this study:
Paragraph 61: **'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'**

Paragraph 62: **‘Within this context, the size, type and tenure of housing need for different groups in the community, should be assessed and reflected in planning policies including but not limited to: those who require affordable housing; families with children; older people; students; people with disabilities; service families; travellers; people who rent their homes; and people wishing to commission or build their own homes.’**

Paragraph 63: **‘where a need for affordable housing is identified, planning policies should specify the type of affordable housing required’.**

- 1.6 Paragraph 65 requires that: **‘strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.’**
- 1.7 The Localism Act 2010 introduced the ‘Duty to Co-operate’ as a replacement for Regional Spatial Strategy and this requirement is also established in National Planning Policy (NPPF 2019, Paragraphs 24-27). Section 110 requires local authorities and other bodies, including Local Enterprise Partnerships to co-operate in maximising the effectiveness of strategic matters within development plan documents. The provision of housing development is a strategic priority and the council will have to ensure that it is legally compliant with the Localism Act at Local Plan examination.
- 1.8 The NPPF 2021 sets out affordable housing definitions which are presented at Technical Appendix A.

Local policy context

- 1.9 Preston City Council, South Ribble Council and Chorley Council have a history of joint working and commissioning of evidence to support Local Plan preparation. arc4 prepared a Local Housing Need Assessment for South Ribble in 2019 to complement the studies being prepared for Preston and Chorley.

Central Lancashire Core Strategy

- 1.10 The Core Strategy prepared jointly by Preston City Council, Chorley Council and South Ribble Council and was adopted in July 2012. It is due for revision before 2026. The housing strategic objectives are:
- SO 5 To make available and maintain within Central Lancashire a ready supply of residential development land ... to help deliver sufficient new housing of appropriate types to meet future requirements.
 - SO 6 To achieve densities for new housing that respect the local character of surrounding areas, whilst making efficient use of land.

- SO 7 To improve the quality of existing housing, especially in Inner East Preston and pockets of poor stock in South Ribble and Chorley, and to bring empty properties back into use.
 - SO 8 To significantly increase the supply of affordable housing and special needs housing particularly in places of greatest need such as in more rural areas.
 - SO 9 To guide the provision of pitches for Gypsies, Travellers and Travelling Showpeople in appropriate locations if genuine need arises.
- 1.11 The strategy's age has resulted in the Affordable and Special Needs policy being revised by the NPPF's 2018 changes. 35% affordable housing contributions will continue to be sought for developments incorporating 10 dwellings or more, or with a site area of 0.5 hectares or more, within the rural areas of Central Lancashire.

City of Preston Corporate policy

- 1.12 Preston has a vision as a growing and vibrant city in the North West. It is often referred to as a beacon demonstrating progressive policies via the "Preston Model". It has three priority areas.
- Your City – "Securing investment; improving assets and infrastructure; attracting high quality jobs; creating a city with a strong cultural and leisure offer."
 - Fairness for you – "Fairness at the heart of decision making; an economy supporting prosperity and promoting fairness in working lives and practices; accessibility to affordable energy and decent affordable homes." This is particularly evident from the Community Wealth Building strategy funded with £100k which favours a local real living wage, local procurement and co-operatives.
 - "Your Council - Providing well run value for money services; demonstrating good governance, openness, transparency and a strong democratic process."

Towns Fund

- 1.13 Preston has secured £21 million through the Towns Fund for non-housing projects in the city centre by 2026. These complement the city living aspirations and include:
- Re-imagining the Harris provide an innovative environment in which museum, library and art gallery
 - Preston Youth Zone is a facility for young people aged 8-19 years covering social, sporting and artistic spaces, including an all-weather pitch, large sports hall, etc.
 - Animate is a new cinema and leisure scheme at the heart of the city centre.
 - Renewal of Harris Quarter Assets provides an opportunity to regenerate City Council-owned assets such as the Guildhall and Amounderness House.

- Harris Quarter Illuminate and Integrate and Animation of Public Spaces to improve the appearance of public spaces and their capacity for event hosting.
- City Centre Skills Spaces which concentrates skills and careers advisory services in Harris Quarter.
- Cultural Capacity Building especially for local community organisations.
- Health and Wellbeing Capacity Building.

Stoneygate Urban Village and the City Living Strategy

- 1.14 The council proposes 1,600 new homes as part of the 25 hectare Stoneygate Urban Village to be delivered in a 15 year trajectory to 2035. The Council's City living target markets are in lifestage order:
- Students and postgraduates
 - Young professionals due to the area's strong employment opportunities.
 - Families and couples
 - Retired drawn by central amenities
- 1.15 The award winning City Living Strategy involves the 'de-risking' of more than 50 brownfield sites to attract private investment and will lead to the building of over 3,000 homes, many of which will be affordable. However, it should be noted these are pre-pandemic aspirations and will have to be calibrated against for example any changes in the direct delivery of higher education and the potential for change from the "race for space" aspiration for out of town housing. The Council is in the process of considering how the City Living Strategy can be reviewed to take account of changes since its launch.

City Deal

- 1.16 City Deal status was introduced by the Government as a way of harnessing the economic growth potential of key cities. The City Deal represents an agreement between the Government, Preston City Council, South Ribble Borough Council and Lancashire County Council to invest in the expansion of infrastructure in the City Deal area to create jobs and generate significant housing growth. The City Deal was signed in September 2013 for an initial ten years.

Economic development

- 1.17 Preston is part of the Lancashire Local Enterprise Partnership (LEP) area. The Lancashire Strategic Economic Plan was published in 2014 which seeks to improve the capability and capacity of our local economy, seizing new opportunities and overcoming barriers that constrain growth to help re-establish Lancashire as a national economic leader. Following the COVID19 pandemic, a Lancashire Economic Recovery Plan has been published. This plan recognises that the impact of COVID19 is yet to be fully realised and plan seeks to:

- Identify the sectors, occupations and places most severely impacted and bring forward immediate solutions to arrest and deflate the intensity of impact;
- Build and share with government, a real-time granular view of the impact of COVID19 on our businesses, workers and places;
- Accelerate capital investment schemes which will generate new jobs, in the near-term, with the help of government; and
- Bring forward a delivery programme which responds to the differential needs of our prime sectors, with a clear focus on business growth, job creation, skills and employment.

General policy context

The White Paper: Levelling Up the United Kingdom

- 1.18 Housing has a key role in the government's Levelling Up proposals. Housing is one of 12 missions, namely:
- **By 2030, renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas**
- 1.19 The proposal for a new minimum standard for privately rented homes will have an impact, but only if the standards from the Decent Homes Review are ambitious and local authorities have the resources to enforce them.
- 1.20 The scrapping of the '80/20' rule, which sees some Homes England housing funds channelled to areas of the highest unaffordability will presumably mean the South East will receive a lower share, if not level of funds.
- 1.21 The encouragement of "county deals" for resource allocation and coordination will place an onus on the district and county to work effectively together.
- 1.22 The White Paper has many, wide-ranging ambitions. However, there is limited detail on how the various targets, objectives and missions are to be achieved.

National Housing Market changes including COVID19 impact

- 1.23 Although not a policy change, and whilst it is too soon to be definitive, the pandemic may be generating new and significant structural alterations in housing markets. It will be important that the pre-pandemic aspirations of extant policies are recalibrated in the light of four emerging phenomena :
- The so called "race for space" linked in part with the emergence of more remote working (notwithstanding the anticipated emerging return of demand from marginal workers in cities)
 - The persisting aspiration for out of town housing in less populated locations
 - The decline in town centre retail and replacement with web based purchasing and

- Possible changes in Higher Education residential requirements driven by more remote teaching approaches
- 1.24 The lack of job security, lower employment and lower economic activity, plus fiscal changes like the 1.25% Health and Social Care Levy, are predicted to depress sale prices in the medium term. Shortages in skilled labour (HGV drivers and construction trades) and unskilled labour have created a 10% rise in median wage costs since February 2020. Added to input cost increases and combined with supply chain shortages an increase in house prices and slower house building is likely in the coming months.
- 1.25 The sharp rise in inflation and now stepping up of Bank Rate (which is predicted to continue) will be important determinants of sales volume and affordability in the short term.

Climate change and energy use

- 1.26 The Government's original 10 Point Plan has now developed along three routes:
- The Net Zero Strategy
 - The Heat and Building's Strategy
 - Wider Decarbonisation
- 1.27 Housing was not mentioned within the Glasgow Climate Pact's 20 pages. However, a third of emissions are ascribed to housing.
- 1.28 Funding is a key challenge. The Commons' Climate Change Committee has said that public investment for the transition needs to double. However, only around £7bn of new investment was announced in the Net Zero Strategy.
- 1.29 The 2021 Heat and Buildings Strategy is allocating a £450m budget for £5,000 grants for heat pumps from April 2022. However, this is only 10% of the scale of public funding required. Similarly, there is no funding for home insulation for the 60% of UK households, who own their own home and are not fuel poor.
- 1.30 The strategy signals the government's intention "to phase out the installation of new natural gas boilers (currently present in 85% of homes) from 2035". However, the alternative is not defined at this point. A proposal was announced to launch a Hydrogen Village trial to inform a decision on the role of that fuel in heating by 2026.
- 1.31 £3.9bn was allocated to support housing decarbonisation of which £800m was for the Social Housing Decarbonisation Fund. This is £3 billion *below* the 2019 manifesto commitment.
- 1.32 Notwithstanding these commitments to spending, heat and buildings remain a significant investment gap in green spending, with nearly £10bn additional investment needed this Parliament to get on track to net zero.
- 1.33 In December 2021, the Department for Levelling Up, Homes and Communities (DLUHC) announced changes to building regulations operational from October 2022 which will require new CO2 emissions from new build homes to be around 30% lower than current standards.

- 1.34 The £320 million Heat Networks Investment Project (HNIP), which supports the development of heat networks (e.g. derived from water courses) across England and Wales, allocated £19 million in 2022 for projects in Liverpool, Kensington and Chelsea, Bristol and Worthing.
- 1.35 The National Infrastructure Bank will fund investment via a new green gilt potentially covering an additional £16bn of green major *infrastructure* spending.

Geography

- 1.36 The City of Preston is located in Central Lancashire and along with Chorley and South Ribble forms a common Housing Market Area. The city occupies a prime strategic location with excellent road connectivity to elsewhere in Lancashire; and regional and national rail connectivity.
- 1.37 The resident population of the City of Preston was estimated to be **142,960** (source: ONS 2018 based population projections for 2020) in 2021.
- 1.38 For the purposes of the HNDA, the City of Preston has been divided into four urban sub-areas and two rural sub-areas (Map 1.1).
- 1.39 The HNDA also presents some data at Lower Super Output Area (LSOA) and parish level to provide a fine-grained analysis of selected household and housing market data.

Future housing need

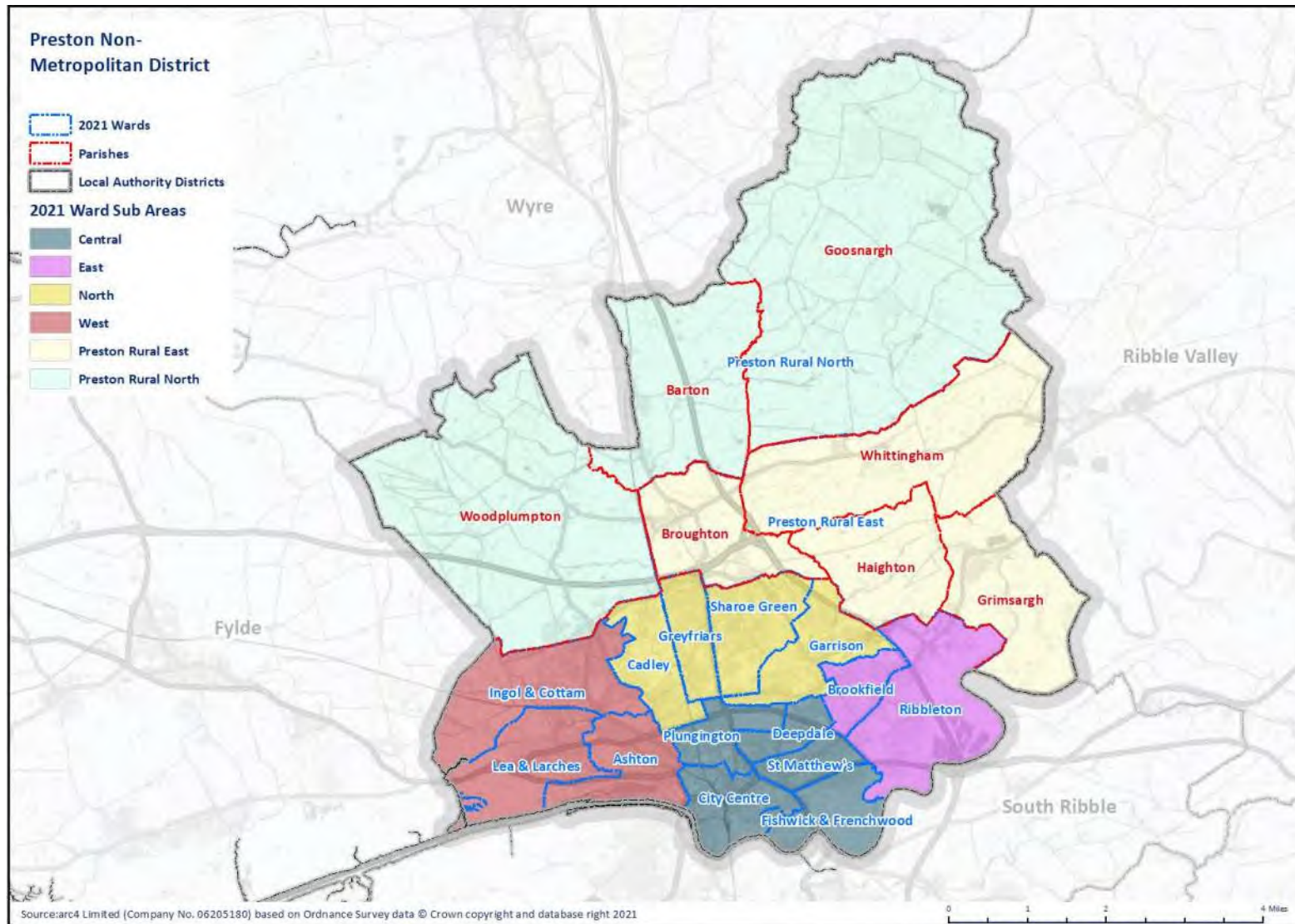
- 1.40 Work on a joint Local Plan for Central Lancashire continues with a target adoption date of the end of 2023. Table 1.1. sets out the annual housing need from the Central Lancashire Housing Needs Assessment prepared by DLP Planning and Edge Analytics.

Table 1.1 Annual housing need 2023 to 2038 across Central Lancashire

Authority	Annual Housing Need
Preston	490
South Ribble	416
Chorley	428
Total	1,334

Source: Central Lancashire Housing Needs Assessment Table 26 Employment-led housing need scenario summary

Map 1.1 City of Preston sub-areas



Research methodology

- 1.41 A multi-method approach has been used to prepare the 2022 HNDA comprising:
- An online survey of stakeholders which included five representatives from strategic and local organisations.
 - Interviews with estate and letting agents operating across the City of Preston.
 - A review of relevant secondary data including the 2011 Census, house price trends, ONS sub-national population projections and DLUHC/ONS household projections, CORE lettings data and DLUHC statistics.
 - A comprehensive online household survey. 16,425 households were contacted across the city and 1,563 responses were achieved representing a 10% response rate and a +/-2.4% sample error.
 - A review of particular client groups relevant to NPPF Paragraph 61, including hard to reach and vulnerable groups.
- 1.42 Further information on the research methodology is presented in Technical Appendix A.

Presentation of data

- 1.43 Data are clearly sourced throughout the HNDA report. Where possible, data are 'triangulated' which means several sources are drawn upon to establish a robust output.

Report structure

- 1.44 The City of Preston HNDA 2022 report is structured as follows:
- Chapter 2 considers the housing market key drivers focusing on dwelling stock, demographic drivers, household characteristics including income, economic drivers and migration.
 - Chapter 3 provides analysis of prices, rents and affordability.
 - Chapter 4 considers the needs of different groups as referenced in the NPPF.
 - Chapter 5 considers overall housing need, affordable need, dwelling type and mix.
 - Chapter 6 concludes the report with a summary of key findings and a consideration of strategic and policy issues.
- 1.45 The main report is accompanied by a separate technical appendix which provides detailed material that underpins the core outputs of the HNDA. The technical appendix material includes:
- Affordable housing tenure definitions (Appendix A).
 - Research methodology (Appendix B).

- Affordable housing need calculations (Appendix C).
 - Dwelling mix analysis (Appendix D).
 - Stakeholder consultation and agent review (Appendix E).
- 1.46 Please note that any references to data from the government department responsible for housing and planning matters has been standardised to the Department for Levelling Up, Housing and Communities (DLUHC).

2. Housing market and key drivers

Introduction

- 2.1 This chapter provides a detailed background to dwelling stock and tenure and the underlying economic, demographic and household drivers across the City of Preston.

Dwelling stock, vacant stock and household estimates

- 2.2 Current estimates of dwelling stock, vacant stock and households from multiple sources are presented in Table 2.1. For the purposes of the 2022 HNDA, the total dwelling stock base is assumed to be **65,220** based on the most recent council tax figure derived from actual council data and the number of households as **58,524**. Around 4.3% of dwellings are vacant compared with the national rate of 2.7% based in DLUHC data. Table 2.2 shows the number of dwellings and household estimates for smaller geographies.

Table 2.1 Dwelling stock and household estimates

Dwelling stock	Dwellings	Source
2020 Valuation Office Agency (all dwellings)	63,200	VOA Table CTSOP3.0
2020 Valuation Office Agency (excluding annex and unknown)	62,670	VOA Table CTSOP3.0
2020 DLUHC Dwelling Stock Estimates	64,847	DLUHC Live Tables
2021 Council Tax data	65,220	Council Tax
Vacant stock	Dwellings	Source
2020 DLUHC Vacancy estimate (all dwellings)	2,812 (4.3%)	DLUHC Table LT_615
2019 DLUHC Long-term vacancy estimate (all dwellings)	1,304 (2.0%)	DLUHC Table LT_615
Households	Households	Source
2014-based DCLG Household Projections 2021 figure	59,514	DLUHC
2018-based ONS Household Projections 2021 figure	58,524	ONS

Table 2.2 Dwelling stock and household estimate by sub-area and parish

Sub-area	Dwellings Number	Dwellings %	Households Number	Households %
Central	23,949	36.7	21,490	36.7
East	7,242	11.1	6,499	11.1
North	14,911	22.9	13,380	22.9
West	12,824	19.7	11,507	19.7
Preston Rural East	3,431	5.3	3,079	5.3
Preston Rural North	2,863	4.4	2,569	4.4
Total	65,220	100.0	58,524	100.0
Preston Rural East/ North Parishes	Dwellings Number	Dwellings %	Households Number	Households %
Barton	610	0.9	548	0.9
Broughton	991	1.5	889	1.5
Goosnargh	535	0.8	480	0.8
Grimsargh	1,157	1.8	1,038	1.8
Haighton	79	0.1	71	0.1
Whittingham	1,204	1.8	1,080	1.8
Woodplumpton	1,718	2.6	1,542	2.6
Total	6,294	9.7	5,648	9.7

Source: Dwellings 2021 Council Tax; households based on 58,524 from 2018-based household projections 2021 figure apportioned across the City in the ratio of 0.8973 households to dwellings (58,524/65,220)

Dwelling type and size

- 2.3 The 2020 Valuation Office Agency data provides details on overall dwelling stock by type, number of bedrooms and council tax band. Table 2.3 presents the overall dwelling stock profile of the city compared with Central Lancashire, the North West and England. Table 2.4 summarises dwelling type and size data for the city.
- 2.4 In summary, Tables 2.3 to 2.4 show:
- 66% of dwellings in the City of Preston are council tax band A or B properties and 34% are band C or above;
 - 73.6% of dwellings are houses (34.5% terraced, 25.5% semi-detached and 13.6% detached), 20.1% are flats and 6.2% are bungalows; and
 - 12.1% of dwellings have one bedroom, 26.5% two bedrooms, 47.6% three bedrooms and 13.9% four or more bedrooms.
- 2.5 Preston has a much higher proportion of Band A properties than Central Lancashire, the North West and England and a much lower proportion of Band C and above properties. Although this may translate to a supply of housing that is affordable, there is an issue of stock condition associated with Band A and B older terraced properties
- 2.6 Map 2.1 illustrates the predominant dwelling type and size by LSOA based on 2020 Valuation Office Agency data.

Table 2.3 Dwelling type, number of bedrooms and council tax band for the City of Preston and comparator areas

Dwelling type and number of bedrooms	Band A	Band B	Bands C-E	Bands F+	City of Preston Total	Central Lancs Total	North West Total	England Total
Bungalow 1-bedroom	0.7%	0.1%	0.0%	0.0%	0.8%	0.8%	1.0%	1.1%
Bungalow 2-bedrooms	0.2%	0.8%	2.2%	0.0%	3.3%	5.2%	4.1%	4.7%
Bungalow 3-bedrooms	0.0%	0.0%	1.7%	0.1%	1.8%	4.2%	2.8%	3.0%
Bungalow 4 or more -bedrooms	0.0%	0.0%	0.2%	0.1%	0.3%	0.7%	0.6%	0.6%
Flat 1-bedroom	10.7%	0.2%	0.0%	0.0%	10.9%	6.7%	8.2%	10.8%
Flat 2-bedrooms	4.4%	2.2%	0.6%	0.0%	7.2%	5.8%	7.9%	10.6%
Flat 3-bedrooms	0.4%	0.0%	0.0%	0.0%	0.5%	0.4%	0.7%	1.8%
Flat 4 or more-bedrooms	0.6%	0.4%	0.5%	0.0%	1.5%	0.6%	0.4%	0.5%
Terraced house 1-bedroom	0.2%	0.0%	0.0%	0.0%	0.3%	0.3%	0.3%	0.5%
Terraced house 2-bedrooms	10.6%	1.6%	0.1%	0.0%	12.3%	10.9%	13.0%	8.8%
Terraced house 3-bedrooms	13.8%	5.0%	1.3%	0.0%	20.1%	15.1%	16.4%	15.0%
Terraced house 4 or more-bedrooms	0.5%	0.7%	0.7%	0.0%	1.9%	1.4%	2.2%	2.4%
Semi-detached house 1-bedroom	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%
Semi-detached house 2-bedrooms	0.4%	2.1%	0.8%	0.0%	3.3%	4.1%	4.0%	3.8%
Semi-detached house 3-bedrooms	3.4%	6.5%	10.2%	0.0%	20.1%	22.2%	21.9%	17.7%
Semi-detached house 4 or more-bedrooms	0.1%	0.1%	1.8%	0.1%	2.0%	2.1%	2.9%	2.6%
Detached house 1-bedroom	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Detached house 2-bedrooms	0.0%	0.0%	0.3%	0.0%	0.3%	0.7%	0.4%	0.7%
Detached house 3-bedrooms	0.0%	0.0%	4.6%	0.4%	5.1%	7.0%	5.0%	5.9%
Detached house 4 or more-bedrooms	0.0%	0.0%	5.2%	3.0%	8.2%	11.6%	7.8%	9.3%
City of Preston Total	46.1%	19.9%	30.3%	3.7%	100.0%	-	-	-
Central Lancashire Total	32.4%	22.9%	40.0%	4.7%	-	100.0%	-	-
North West Total	40.5%	20.4%	34.1%	5.0%	-	-	100.0%	-
England Total	23.7%	19.7%	47.4%	9.1%	-	-	-	100.0%

Base: Preston 62,670, Central Lancashire 163,444 NW 3,284,200, England 24,165,880 (excludes annex, other and missing)

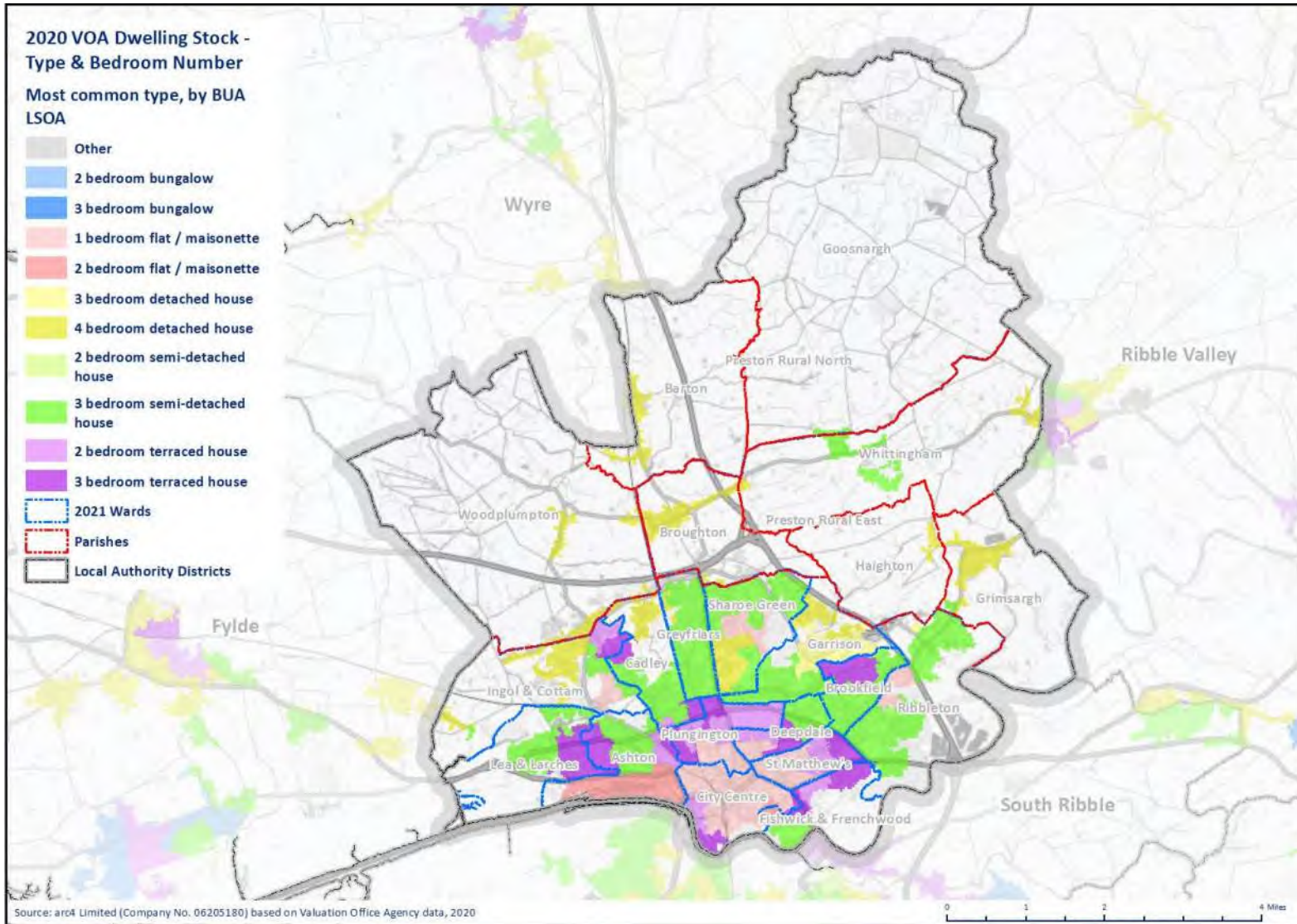
Source: VOA 2020

Table 2.4 Dwelling type, number of bedrooms and council tax band summary

Dwelling type	Council Tax Band A	Council Tax Band B	Council Tax Bands C-E	Council Tax Bands F+	City of Preston Total
Bungalow	0.9%	0.9%	4.1%	0.2%	6.2%
Flat	16.1%	2.9%	1.2%	0.0%	20.1%
Terraced	25.2%	7.3%	2.1%	0.0%	34.5%
Semi-detached	4.0%	8.7%	12.8%	0.1%	25.5%
Detached	0.0%	0.0%	10.1%	3.5%	13.6%
Total	46.1%	19.9%	30.3%	3.7%	100.0%
Number of bedrooms	A	B	C-E	F+	City of Preston Total
1-bedroom	11.7%	0.3%	0.1%	0.0%	12.1%
2-bedrooms	15.6%	6.8%	4.0%	0.0%	26.5%
3-bedrooms	17.7%	11.6%	17.7%	0.5%	47.6%
4-bedrooms (or more)	1.1%	1.1%	8.5%	3.2%	13.9%
Total	46.1%	19.9%	30.3%	3.7%	100.0%

Source: VOA 2020

Map 2.1 Predominant dwelling type and size by built-up areas within LSOAs: City of Preston



Source: Valuation Office Agency 2020

- 2.7 There are an estimated 3,500 houses in multiple occupancy according to 2019/20 Local Authority Housing Statistics of which 116 are licenced. There are 208 properties listed on the council's online HMO register.

Property age and condition

The age and condition of City of Preston's housing

- 2.8 The age profile of the dwelling stock in the city is summarised in Table 2.5. 42.9% of dwellings were built before 1945, 32.2% between 1945 and 1982 and 24.9% since 1983.

Table 2.5 Age of dwelling

Age of Dwellings	Number	%
pre-1919	14,370	24.7%
1919-44	10,590	18.2%
1945-64	9,280	16.0%
1965-82	9,430	16.2%
1983-99	8,690	15.0%
post 1999	5,730	9.9%
Total	58,090	100.0%
Unknown	490	-
Grand Total	58,580	-

Source: VOA 2020

- 2.9 The English Housing Survey (EHS) produces national data on dwelling condition. Applying national trends to the stock profile of the City of Preston (Table 2.6) would suggest that around 18.9% of dwelling stock is non-decent, which is lower than the national average of 20.6%. The number of dwellings likely to fail the minimum standard of decent homes criteria is estimated to be 11.3% (compared with 11.9% nationally).
- 2.10 A full definition of what constitutes a decent home is available from DLUHC (source: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7812/138355.pdf) but in summary a decent home meets the following four criteria:
- it meets the current statutory minimum for housing;
 - it is in a reasonable state of repair;
 - it has reasonably modern facilities and services; and
 - it provides a reasonable degree of thermal comfort.
- 2.11 A 2019 analysis for Preston City Council by the Building Research Establishment concluded
- 7,793 dwellings in the private sector have category 1 Housing Health and Safety Rating System (HHSRS) hazards (16% of properties).

- 2,512 dwellings in the private rented sector have category 1 HHSRS hazards (16% of properties in the private rented sector)
 - Highest concentrations of all HHSRS hazards were in Preston Rural North, Deepdale and Fishwick & Frenchwood Wards.
- 2.12 The 2021 household survey provides an indication of household satisfaction with the state of repair of accommodation. Overall 72.1% of respondents expressed satisfaction (34.3% were very satisfied and 37.8% were satisfied); 16.7% were neither satisfied nor dissatisfied. A total of 11.2% expressed degrees of dissatisfaction, of whom 8.1% were dissatisfied and 3.1% were very dissatisfied.
- 2.13 Table 2.7 considers how dissatisfaction with state of repair varies by tenure, property type, age and location. Dissatisfaction was highest amongst those living in affordable housing (which is more reflective of tenant expectations of landlord responses to repairs rather than the actual state of repair) and private renters; those in flats/apartments/maisonettes and terraced houses; and those in properties built before 1945.

Table 2.6a Dwelling stock condition in England estimates (percentage)

Dwelling age (ehs)	Non-decent	Fails Decent Homes Minimum Standard (%)	Fails Decent Homes Repair (%)	Fails Decent Homes Modern facilities and services(%)	Fails Decent Homes Thermal Comfort (%)	All dwellings in group (000s)	% dwellings
pre-1919	33.5	23.3	7.4	3.9	9.7	4,952	20.5
1919-44	20.1	12.1	5.0	2.2	6.5	3,694	15.3
1945-64	17.2	9.0	4.8	1.9	5.0	4,621	19.1
1965-80	13.7	7.1	1.0	0.9	6.5	4,732	19.6
1981-90	18.0	4.2	.7	3.0	12.3	1,946	8.1
post 1990	2.7	2.5	*	*	*	4,228	17.5
Total	20.6	11.9	4.6	1.9	7.5	24,173	100.0

Table 2.6b Dwelling stock condition in City of Preston estimates (number)

Dwelling age (ehs)	Dwelling age (voa)	Non-decent	Fails Decent Homes Minimum Standard	Fails Decent Homes Repair	Fails Decent Homes Modern facilities and services	Fails Decent Homes Thermal Comfort	All dwellings in group (000s)	% dwellings
pre-1919	pre-1919	4,814	3,348	1,063	560	1,394	14,370	24.7%
1919-44	1919-44	2,129	1,281	530	233	688	10,590	18.2%
1945-64	1945-64	1,596	835	445	176	464	9,280	16.0%
1965-80	1965-82	1,292	670	94	85	613	9,430	16.2%
1981-90	1983-1992	898	210	35	150	614	4,990	8.6%
post 1990	Post 1992	255	236	*	*	*	9,430	16.2%
Total	-	10,983	6,580	2,168	1,204	3,773	58,090	100.0%
% of all stock	-	18.9	11.3	3.7	2.1	6.5	-	-
National %	-	20.6	11.9	4.6	1.9	7.5	-	-

Source: English Housing Survey 2013 data applied to 2020 Valuation Office Agency dwelling stock age

Note ‘*’ indicates sample size too small for reliable estimate

Table 2.7 Dissatisfaction with quality of accommodation by tenure, property type and property age

Tenure	No. dissatisfied	% Dissatisfied	Base (households)
Owner occupier	2,882	7.3%	39,285
Private rented	1,230	17.5%	7,021
Affordable housing	2,465	20.2%	12,218
Total (all responses)	6,577	11.2%	58,524
Missing cases	-	-	0
Total (all households)	-	-	58,524
Property Type	No. dissatisfied	% Dissatisfied	Base (households)
Detached house	565	4.5%	12,420
Semi-detached house	1,877	11.2%	16,804
Terraced house / town house	2,546	14.1%	18,077
Bungalow	239	8.0%	2,986
Maisonette	86	36.9%	234
Flat / apartment	1,256	17.2%	7,323
Caravan/part home / other	8	1.3%	592
Total (all responses)	6,577	11.3%	58,438
Missing cases	-	-	86
Total (all households)	-	-	58,524
Property Age	No. dissatisfied	% Dissatisfied	Base (households)
Pre 1919	1,006	10.4%	9,638
1919 to 1944	1,641	16.6%	9,884
1945 to 1964	253	4.4%	5,713
1965 to 1984	408	5.2%	7,880
1985 to 2004	644	6.4%	10,093
2005 onwards	199	4.7%	4,282
Don't know	2,425	22.0%	11,008
Total (all responses)	6,577	11.2%	58,498
Missing cases	-	-	26
Total (all households)	-	-	58,524
Sub-Area	No. dissatisfied	% Dissatisfied	Base (households)
Central	3,659	17.0%	21,490
East	512	7.9%	6,499
North	1,116	8.3%	13,380
West	1,158	10.1%	11,507
Preston Rural East	61	2.0%	3,079
Preston Rural North	71	2.7%	2,569
City of Preston Total	6,577	11.2%	58,524

Source: 2021 household survey

Housing tenure

- 2.14 The tenure profile by sub-area is presented in Table 2.8. This is based on the 2011 Census overall but also takes into account growth in the private rented sector. 60.6% of occupied dwellings are owner-occupied, 19.5% are private rented (including tied accommodation and student housing) and 19.9% are affordable (including social rented from a council or housing association and shared ownership). There are considerable variations in tenure profile by sub-area. For instance, the proportion of affordable dwellings is highest in the East, West and Central sub-areas; and private renting highest in the Central sub-area (which is influenced by the student rental market). The proportion of owner occupied dwellings is highest in the rural areas and the North sub-area.

Table 2.8 Tenure profile by sub-area (%)

Sub-area	Owner occupied	Private rented	Affordable	Total	Base
Central	43.2%	35.8%	21.0%	100.0%	21,615
East	50.6%	17.2%	32.3%	100.0%	6,547
North	82.0%	10.4%	7.6%	100.0%	13,060
West	65.7%	11.6%	22.7%	100.0%	11,690
Preston Rural East	87.7%	9.3%	3.0%	100.0%	3,034
Preston Rural North	88.0%	9.9%	2.0%	100.0%	2,578
City of Preston Total	60.6%	19.5%	19.9%	100.0%	58,524

Source: 2011 Census KS402EW and 2021 household estimate

- 2.15 Variations in the characteristics of properties and households by tenure are explored in Table Tables 2.9 (properties), 2.10 (households) and 2.11 (economic activity and income).

Table 2.9 Characteristics of properties by tenure

Dwelling type	Owner occupied %	Private rented %	Affordable %	All tenures %
1 or 2 bedroom terraced house	6.7	19.3	12.6	9.4
1 or 2 bedroom semi-detached/detached house	3.8	9.8	11.1	6.0
3 bedroom terraced house	15.0	22.9	11.7	15.2
3 bedroom semi-detached/detached house	27.8	10.9	22.1	24.6
4 or more bedroom terraced house	6.0	3.4	1.5	4.7
4 or more bedroom semi-detached/detached house	31.6	0.5	2.2	21.8
1 bedroom flat/maisonette	0.4	5.3	20.3	5.1
2 bedroom flat/maisonette	2.8	15.4	11.6	6.1
3 or more bedroom flat/maisonette	0.0	10.1	0.7	1.3
1 bedroom bungalow/other	0.0	0.0	4.0	0.8
2 bedroom bungalow/other	2.5	2.4	1.3	2.2
3 or more bedroom bungalow/other	3.5	0.0	0.9	2.6
Total	100.0	100.0	100.0	100.0
Property age	Owner occupied %	Private rented %	Affordable %	All tenures %
Pre 1919	21.5	42.3	2.2	19.6
1919 to 1944	22.0	18.7	14.1	20.4
1945 to 1964	10.8	12.7	18.7	12.3
1965 to 1984	17.2	3.1	18.6	16.5
1985 to 2004	20.9	16.6	26.4	21.5
2005 onwards	7.6	6.7	20.0	9.6
Total	100.0	100.0	100.0	100.0
Base	39,285	7,021	12,218	58,524

Table 2.10 Characteristics of households by tenure: household type, length of residence and ethnicity

Household type	Owner occupied %	Private rented %	Affordable %	All tenures %
Single adult (under 65)	11.7	25.6	24.6	16.0
Single adult (65 or over)	7.5	5.1	15.9	9.0
Couple only (both under 65)	19.6	22.7	9.8	17.9
Couple only (one or both over 65)	16.3	2.2	6.3	12.6
Couple with at least 1 or 2 child(ren) under 18	18.7	14.1	9.5	16.3
Couple with 3 or more children under 18	4.8	5.1	6.1	5.1
Couple with child(ren) aged 18+	11.9	3.2	3.1	9.1
Lone parent with at least 1 or 2 child(ren) under 18	2.2	3.9	12.0	4.4
Lone parent with 3 or more children under 18	0.2	0.0	5.4	1.2
Lone parent with child(ren) aged 18+	2.2	2.7	1.4	2.1
Student household	0.3	12.0	0.0	1.6
Other type of household	4.5	3.6	5.8	4.7
Total	100.0	100.0	100.0	100.0
Length of residence	Owner occupied %	Private rented %	Affordable %	All tenures %
Less than 5 years	20.7	76.9	34.5	30.4
5 years or more	79.3	23.1	65.5	69.6
Total	100.0	100.0	100.0	100.0
Ethnicity	Owner occupied %	Private rented %	Affordable %	All tenures %
White	80.6	64.3	76.5	77.9
BAME	19.4	35.7	23.5	22.1
Total	100.0	100.0	100.0	100.0
Base	39,285	7,021	12,218	58,524

Table 2.11 Characteristics of households by tenure: economic activity and income

Economic activity of respondent	Owner occupied %	Private rented %	Affordable %	All tenures %
Working full-time (30 or more hours each week)	45.7	45.3	29.7	42.3
Working part-time (between 16 and up to 30 hours each week)	10.7	11.1	10.0	10.6
Working part-time (up to 16 hours each week)	2.5	6.0	5.2	3.5
Self-employed (full or part-time)	5.1	3.0	3.2	4.5
On government supported training programme	0.0	1.9	0.0	0.2
In full-time education (at school, college, university)	0.3	12.2	2.4	2.1
Unemployed and available for work	0.7	3.8	3.0	1.6
Permanently sick/disabled	2.7	5.5	12.4	5.0
Wholly retired from work	28.0	6.4	18.4	23.5
Looking after the home and/or children	2.6	4.8	8.6	4.1
Full-time carer or volunteer	1.8	0.0	7.1	2.7
Total	100.0	100.0	100.0	100.0
Household income	Owner occupied %	Private rented %	Affordable %	All tenures %
Up to £300 each week /£15,600 each year	10.7	36.9	51.6	22.0
between £300 and £500 each week / £15,600 to £26,000 each year	18.0	25.2	24.8	20.2
Between £500 and £750 each week / £26,000 to £39,000 each year	22.3	10.5	14.2	19.2
Between £750 and £1,150 each week / £39,000 to £59,800 each year	23.7	18.8	8.2	20.0
£1,150 each week / £59,800 each year or more	25.3	8.6	1.3	18.5
Base	39,285	7,021	12,218	58,524

The owner-occupied sector

- 2.16 An analysis of house prices and trends over time is presented in Chapter 3.
- 2.17 A detailed analysis of the characteristics of properties and households living in the owner occupied sector (Tables 2.9 to 2.11) indicates that:
- 59.4% of dwellings are semi-detached and detached properties with 3 or more bedrooms. The remaining properties tend to be terraced houses, with 3.2% flats and 6% bungalows.
 - There is a broad range of property ages and 28.5% of owner occupied properties have been built since 1985.
 - Owner occupier households tend to be couples under 65 and couples under 65 with families (55%) and older singles and couples (23.8%).
 - Most (79.3%) had lived in their accommodation for at least 5 years.
 - The private rented sector is the least ethnically diverse tenure, with 19.4% of household reference people from a BAME ethnicity.
 - 64% of household reference people were working either full or part-time and 28% are wholly retired from work.
 - Household incomes tend to be higher, with 49% having an annual income of at least £39,000.

Stakeholder views on the owner-occupied sector

- 2.18 A full analysis of the findings of the online stakeholder survey and from discussions with estate agents is set out in Technical Appendix E. Key points raised by stakeholders include:
- Build a range of property types to meet demand.
 - Main shortage is two and three-bedroom market houses and apartments.
 - A wide range of sites are needed to provide a diverse range of dwellings.
 - Development of bungalows can be challenging financially but need within the city is recognised.
- 2.19 Appendix E provides a summary of market activity by sub-area.

The private rented sector

- 2.20 The private rented sector has become an important tenure in both meeting people's housing needs and providing flexible housing options for those moving for employment and to respond to changing circumstances. Across the City of Preston, the proportion of households renting increased from 11% in 2001 to around 19.9% in 2018 (ONS tenure estimates). Increasing house prices pre-2007 and the struggling sales market when the downturn came are both factors that have underpinned the growth of the rental market for both 'active choice' renters and 'frustrated would-be' homeowners. Tenure reform and less accessible social rented housing are also likely to be an increasing factor to the growth in the private rented sector and the sector clearly now plays a vital role

in meeting housing need, affordable need as well as providing an alternative to homeownership.

- 2.21 A detailed analysis of the characteristics of properties and households living in the private rented sector (Tables 2.9 to 2.11) indicates that:
- around 46% of dwellings are terraced properties, with 22.9% of all private rented properties 3 bedroom terraced houses; 31% are flats, particularly two and three bedroom.
 - Properties tend to be older, with 42.3% built before 1919 although 22.3% were built after 1985 and reflects the underlying profile of older terraced and newly-built flats.
 - 30.7% of private renters are single person households and 12% are student households; the sector also accommodates a range of household types.
 - Most (76.9%) had lived in their accommodation for less than 5 years.
 - The private rented sector is the most ethnically diverse tenure, with 35.7% of household reference people from a BAME ethnicity.
 - 65.4% of household reference people were working either full or part-time and 12% were in full-time education.
 - The private rented sector provides for a range of income groups. Although 36.9% of households had an income of less than £15,600 each year, 27.4% had an income of at least £39,000 each year.
- 2.22 Local authorities have an important enabling and regulatory role in ensuring that the private rented sector helps to meet housing need. Balancing good quality supply with demand will help to stabilise rents and encouraging good quality management will improve the reputation of the sector and encourage longer term lets and lower turnover. However, this is a challenging task where existing partners need to be encouraged to participate and new partners and investors need to be identified.

Build to Rent

- 2.23 Build to Rent schemes have a number of benefits. Schemes can quickly increase supply and provide improved quality and wider choice in housing markets; the accommodation and service offer provide better tenure options for households looking to rent longer term compared to what is available in the current PRS. Standards are more professional, tenancies longer and by introducing an affordable offer (minimum 20% below market rents), these schemes can meet an identified and specific need as affordable rental accommodation.
- 2.24 Local authorities already have tools and powers at their disposal to support Build to Rent. For example, as part of their plan making and decision taking processes, authorities can:
- Identify sites in their Strategic Land Availability Assessments which might be well suited to particular types of development.
 - Include policies in their Local Plans on Build to Rent

- Choose whether or not to deploy the nationally described space standard, taking into account viability and need considerations.
- 2.25 Local authorities also have non-planning powers at their disposal through which they can support Build to Rent, such as using their own council land holdings.

Stakeholder views on the private rented sector

- 2.26 Stakeholders commented:
- Demand for rental products including Build to Rent across all areas, particularly affordable market rent.

Affordable housing

- 2.27 There are 12,220 affordable dwellings across the City of Preston according to the Regulator of Social Housing Statistical Data Return 2020 data:
- 10,209 general needs rented units;
 - 1,496 supported housing/housing for older people units; and
 - 515 low-cost home ownership units.
- 2.28 A detailed analysis of the characteristics of properties and households living in affordable housing (Tables 2.9 to 2.11) indicates that:
- Around 32.6% of dwellings are flats, with 23.7% smaller 1 and 2 bedroom houses, 37.5% larger 3 or more bedroom houses and 6.1% are bungalows.
 - 37.4% of properties were built between 1945 and 1984, 46.4% have been built since 1985 and 16.2% were built before 1945.
 - 40.5% of affordable housing residents are single person households, 18.8% are lone parents and 34.8% are couples or couples with children and 5.8% are other household types.
 - 65.5% had lived in their accommodation for more than 5 years.
 - 23.5% of household reference people have a BAME ethnicity.
 - Affordable housing household reference people are less likely to be in work compared with other tenures (48.1%) and more likely to be permanently sick/disabled (12.4%) and looking after the home/family or caring for someone (15.7%).
 - Incomes tend to be low, with 51.6% of households with an income less than £15,600 each year.

Stakeholder views on affordable housing

- 2.29 A full analysis of the findings of the online stakeholder survey is set out in Technical Appendix E. A short summary for the affordable sector is provided here.
- 2.30 Stakeholders commented that:

- Specific need for 1 bedroom flats, bungalows and 2, 3 and 4 bedroom houses.
- A need for adapted ground floor accommodation.
- Limited availability of affordable bungalows.
- There is demand for shared ownership but supply needs to be balanced against affordability, for instance there may be demand for 4-bedroom shared ownership properties but these may not be affordable.
- There is a particular need for larger properties.

Past trends in housing delivery

2.31 Over the past 11 years (2010/11 to 2020/21) 5,372 net new dwellings have been built across the City of Preston (Table 2.12), over half of which have been built in the five years to 2021/22. In the past 5 years, an annual average of 828 net completions have been achieved. A comparison of annual completions with the annual housing requirement is presented in Figure 2.1. The distribution of newbuild activity since 2007 is shown in Map 2.2.

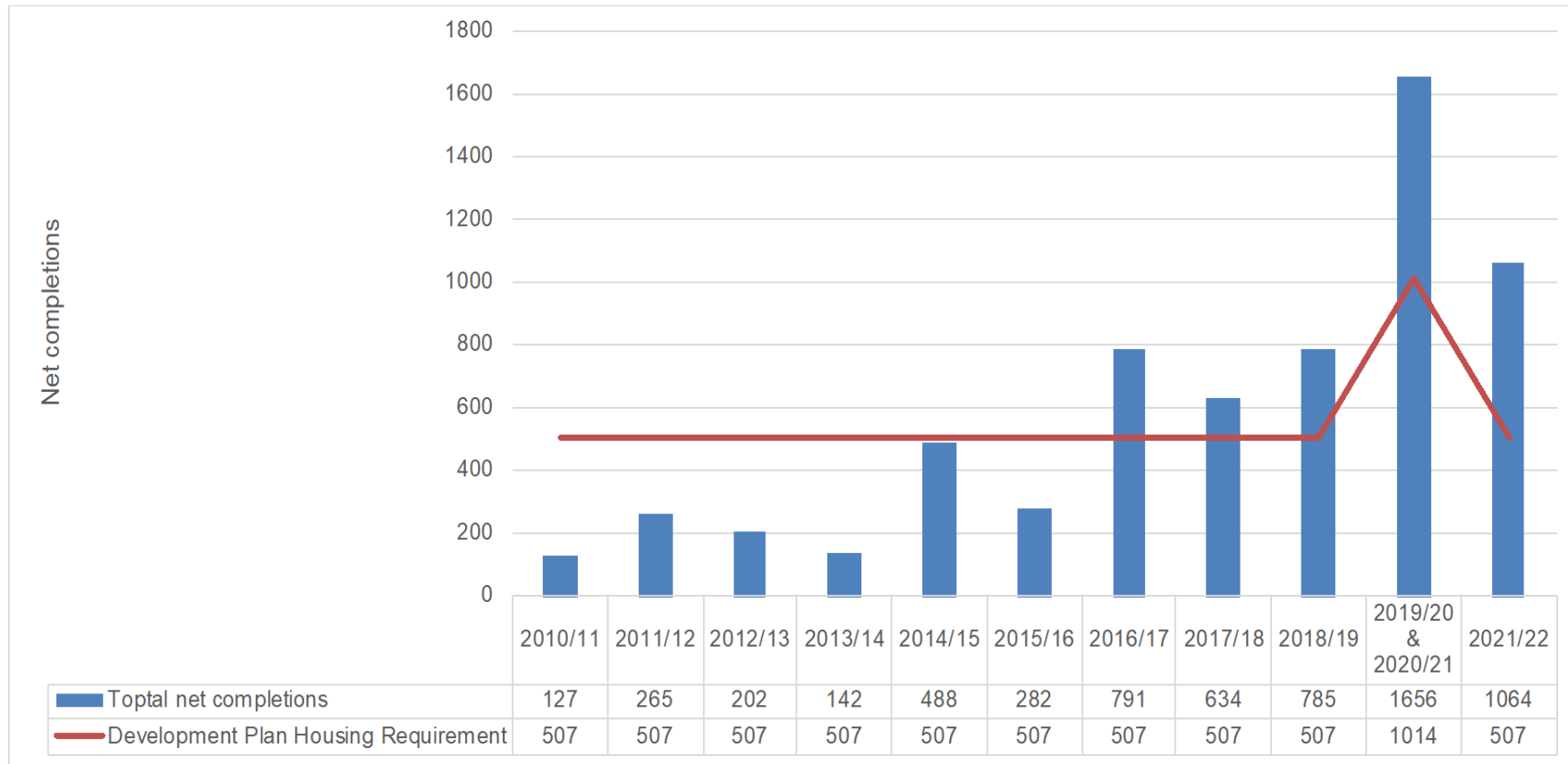
Table 2.12 Dwelling completions 2010/11 to 2021/22

Year	Total net completions	Development Plan Housing Requirement	Net completion minus Housing Requirement	Gross Affordable completions
2010/11	127	507	-380	0
2011/12	265	507	-242	38
2012/13	202	507	-305	66
2013/14	142	507	-365	35
2014/15	488	507	-19	16
2015/16	282	507	-225	178
2016/17	791	507	284	137
2017/18	634	507	127	197
2018/19	785	507	278	213
2019/20 & 2020/21	1656	1014	642	430
2021/22	1064	507	557	259
TOTAL (12 years)	6436	6084	352	1569
Annual average (12 years)	536	507	29	131
Total (past 5 years)	4139	2535	1604	1099
Annual average (past 5 years)	828	507	321	220

Sources: Preston City Council Annual Monitoring Reports and council data

Note that COVID19 impacted on standard monitoring practices so data for 2019/20 and 2020/21 were combined which is also reflected in a higher development plan housing requirement for combined years

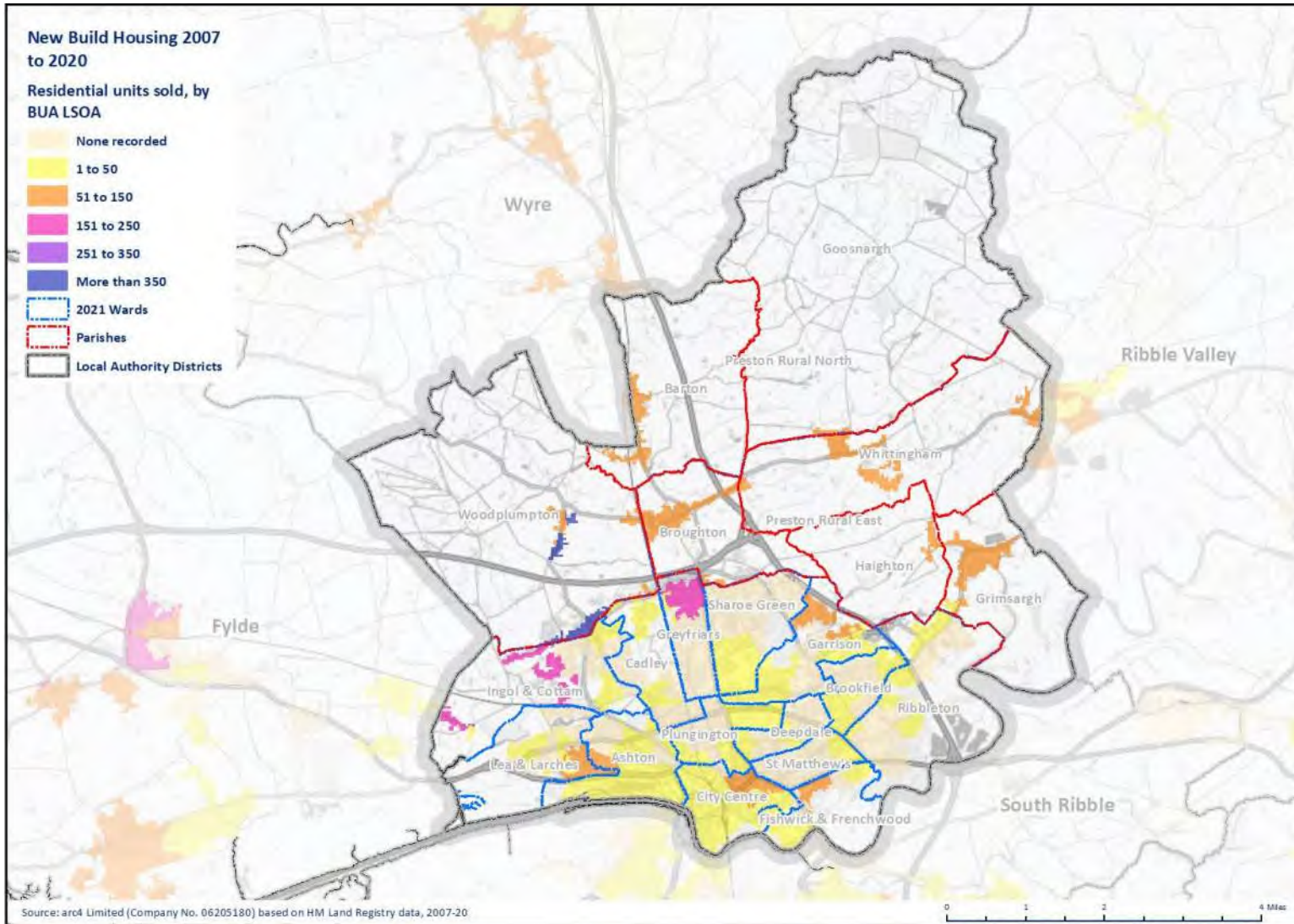
Figure 2.1 Dwelling completions compared with the annual requirement, 2010/11 to 2021/22



Source: Preston City Council Annual Monitoring Reports

Note: COVID19 impacted on standard monitoring practices so data for 2019/20 and 2020/21 are combined

Map 2.2 Newbuild dwellings by LSOA over period 2007-2020



Source: Land Registry © Crown copyright 2020

Demographic drivers: population and households

Population projections

- 2.32 The ONS produces population projections every two years. The latest 2018-based principal ONS population projections report a 2021 population of 142,960 across the city which is expected to increase by 5,010 (3.5%) to 147,970 by 2038 (Table 2.13). There is an increase across most age cohorts but mainly across older age groups, although there is reduction in the 55-64 cohort. Table 2.11 also shows the 2014-based ONS population projection totals. These projections underpin the 2014-based DLUHC household projections which inform the standard method to calculate housing need. They show a lower level of population growth compared with the 2018-based projections.

Table 2.13 Change in population 2021-2038 by age

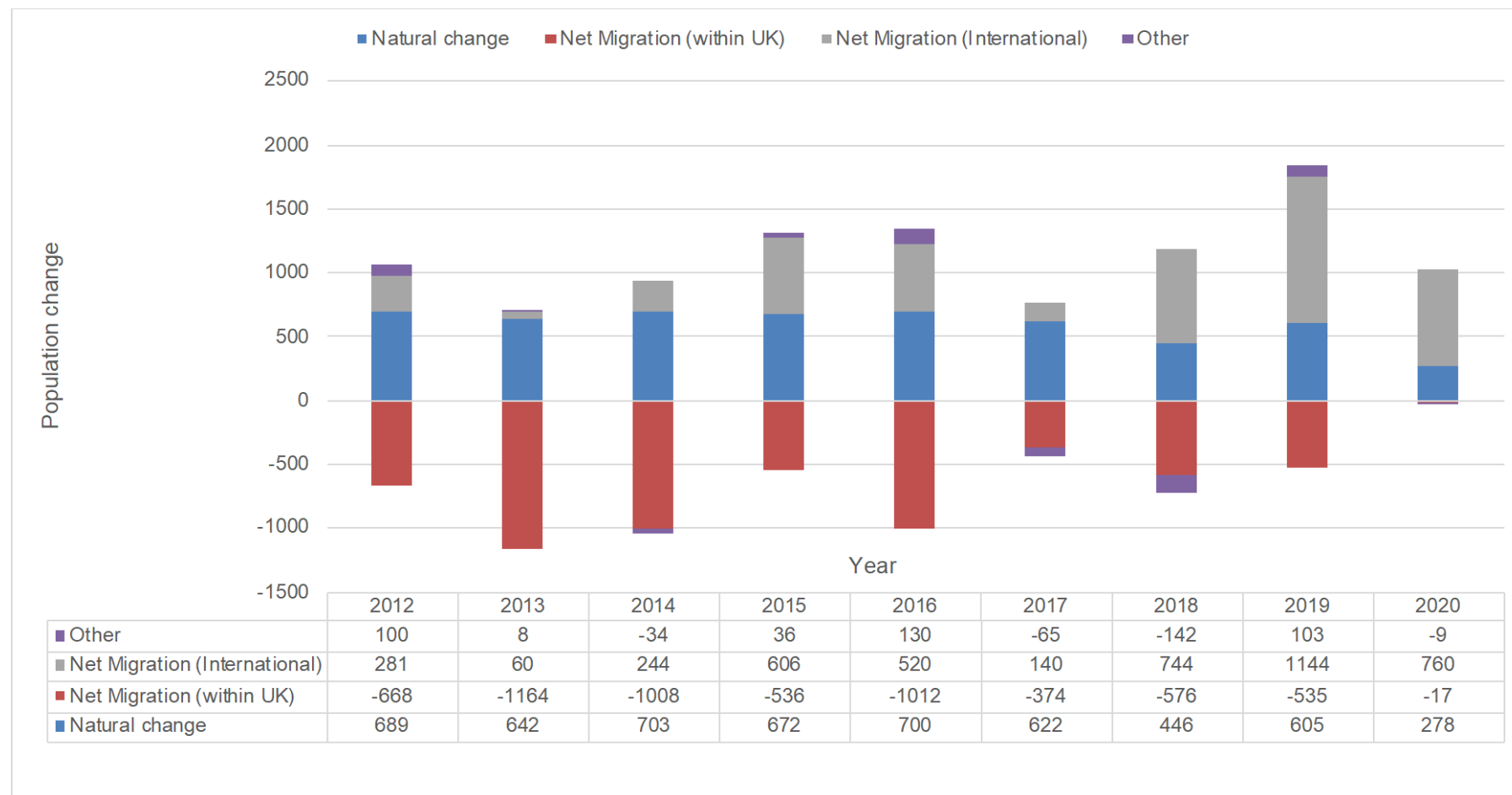
Age groups	2018-based ONS projections 2021	2018-based ONS projections 2038	2018-based ONS projections Number change 2021-2038	2018-based ONS projections % change 2021-2038
0-19	36,962	36,549	-412	-1.1%
20-39	42,966	43,735	769	1.8%
40-54	25,411	26,127	716	2.8%
55-64	16,428	14,398	-2,030	-12.4%
65-74	11,612	14,248	2,636	22.7%
75-84	6,897	9,352	2,455	35.6%
85+	2,685	3,561	876	32.6%
All Ages	142,960	147,970	5,010	3.5%
Age groups	2014-based ONS projections 2021	2014-based ONS projections 2038	2014-based ONS projections Number change 2021-2038	2014-based ONS projections % change 2021-2038
All Ages	142,100	145,400	3,300	2.3%

Source: 2018-based and 2014-based ONS population projections

Components of population change

- 2.33 The ONS publish mid-year population estimates at local authority level which includes an analysis of components of population change which takes account of natural change (births minus deaths), national migration and international migration. The component analysis also includes 'other' change which can include boundary adjustment and military population moves. The data for the City of Preston 2011-2020 is shown in Figure 2.2. Over the period 2011 to 2020, net in-migration has consistently had the greatest impact on population change.

Figure 2.2 Components of population change 2011 to 2020



Source: ONS Components of Change

Migration trends 2011-2019

- 2.34 Table 2.14 presents a detailed analysis of internal and international migration by year and Table 2.15 summarises the data by broad age and year groups. The base numbers may differ slightly from the ONS components of change analysis due to rounding but provides useful insight into the age group of migrants, their origins and destinations and the relative importance of international migration.
- 2.35 Key trends in migration over the period 2011 to 2019 include:
- The overall annual level of population movement has varied, with net in-migration in 4 years and outflows in 5 years, with the highest net outflow of 1,104 in 2013 and highest net inflow of 609 in 2019.
 - Strongest interactions are with districts in Lancashire and Greater Manchester.
 - Consistent net outflows to the rest of Central Lancashire, Fylde and Wyre (averaging 435 each year); and a general outflow to Lancashire as a whole (averaging 434 each year) but there is a consistent net inflow from the rest of Lancashire to Preston (averaging 160 each year).
 - Overall, there is a net outflow from Preston to other areas of the UK (averaging 690 each year)
 - International migration has had a positive impact on population (averaging 489 each year), with net in-flows in all years and highest in 2019.
 - In terms of migration by age group:
 - During 2011-19, the key inflows were people in the under 30, driven by international net-migration. There were also net inflows from the 'rest of Lancashire' but outflows to Central Lancashire along with elsewhere in England and increasing net outflows to Greater Manchester.
 - Consistent outflows of the 30-64 age group, with moves tending to be within the North West and mainly to Central Lancashire and Fylde.
 - Consistent outflow of 65+ age group but involving a smaller number of people compared with the other age groups. Particular outflow to Fylde and the rest of England.
- 2.36 An analysis of migration flows indicates a general net outflow to other areas, mainly in the North West with a particular emphasis of flows to elsewhere in Central Lancashire and Fylde. International migration has helped to sustain population and a key driver in the growth of the under 30 population across the City of Preston.

Table 2.14 National and international migration by year

YEAR	Preston	CENTRAL LANCs			LANCASHIRE						GREATER MANCHESTER				OTHER NEIGHBOURING AREAS / ELSEWHERE UK					TOTAL (UK Internal)	International	TOTAL (Internal & International)
		Chorley	South Ribble	Central Lancs TOTAL	Fylde	Ribble Valley	West Lancashire	Wyre	Rest of Lancashire	Lancashire TOTAL	Wigan	Bolton	Rest of Greater Manchester	Greater Manchester TOTAL	Rest of North West Region	ENGLAND (rest of)	SCOTLAND	NORTHERN IRELAND	WALES			
2011	Migrated OUT to	368	1,058	1,426	314	290	73	258	850	3,211	133	138	717	989	757	2,551	186	41	141	7,874	894	8,768
	Migrated IN from	224	822	1,046	206	268	98	206	895	2,719	140	171	778	1,089	924	2,571	127	69	134	7,632	1,560	9,192
	NET	-144	-236	-380	-108	-21	25	-52	45	-492	6	32	62	100	167	20	-59	28	-7	-242	666	424
2012	Migrated OUT to	449	1,310	1,759	321	283	113	290	851	3,616	191	204	930	1,324	922	2,750	184	44	176	9,016	790	9,806
	Migrated IN from	233	912	1,145	238	237	115	264	1,028	3,026	181	192	914	1,287	1,112	2,566	128	74	155	8,348	1,071	9,419
	NET	-215	-398	-614	-83	-46	2	-26	178	-589	-10	-12	-16	-38	190	-184	-56	30	-20	-668	281	-387
2013	Migrated OUT to	439	1,202	1,641	369	247	87	310	900	3,553	182	174	909	1,265	950	2,712	190	50	155	8,877	1,060	9,937
	Migrated IN from	256	888	1,144	183	269	92	239	1,091	3,017	151	207	854	1,212	884	2,278	116	52	155	7,713	1,120	8,833
	NI I	-183	-314	-497	-186	22	5	-72	191	-536	-31	33	-55	-54	-67	-435	-74	2	-1	-1,164	60	-1,104
2014	Migrated OUT to	445	1,247	1,692	406	362	119	349	853	3,781	203	201	1,002	1,406	991	2,661	205	35	138	9,217	1,107	10,324
	Migrated IN from	319	955	1,274	220	258	93	351	1,038	3,234	147	196	887	1,230	1,039	2,362	136	45	163	8,209	1,351	9,560
	NET	-126	-292	-418	-185	-105	-26	2	185	-547	-56	-5	-115	-176	47	-298	-69	10	25	-1,008	244	-764
2015	Migrated OUT to	435	1,351	1,785	412	345	93	314	783	3,733	146	181	979	1,306	983	2,569	183	58	177	9,009	1,000	10,009
	Migrated IN from	329	960	1,289	272	251	111	272	1,060	3,254	141	226	885	1,253	891	2,679	160	52	183	8,473	1,606	10,079
	NET	-106	-391	-497	-140	-95	18	-42	277	-478	-6	47	-94	-53	-91	110	-23	-7	6	-536	606	70
2016	Migrated OUT to	463	1,331	1,794	391	360	135	364	972	4,016	158	157	969	1,285	968	2,576	180	62	172	9,259	1,164	10,423
	Migrated IN from	354	861	1,215	309	281	120	195	1,056	3,175	158	221	863	1,242	949	2,510	159	49	163	8,247	1,684	9,931
	NET	-109	-470	-579	-82	-79	-16	-169	84	-841	0	64	-107	-43	-20	-66	-21	-13	-9	-1,012	520	-492
2017	Migrated OUT to	427	1,237	1,664	362	306	92	312	885	3,620	140	191	1,039	1,371	994	2,884	160	40	184	9,253	1,308	10,561
	Migrated IN from	323	846	1,169	250	353	142	225	1,088	3,228	159	180	1,023	1,363	1,009	2,973	97	49	160	8,879	1,448	10,327
	NET	-104	-391	-495	-111	47	51	-87	203	-393	18	-11	-16	-8	15	89	-62	9	-24	-374	140	-234
2018	Migrated OUT to	410	1,177	1,587	391	308	114	369	1,001	3,769	166	192	1,043	1,401	947	2,907	126	37	158	9,346	1,106	10,452
	Migrated IN from	353	967	1,320	278	324	122	225	1,135	3,405	124	226	925	1,275	911	2,794	139	46	200	8,770	1,850	10,620
	NI I	-56	-210	-266	-113	16	8	-144	134	-365	-42	34	-117	-125	-36	-113	13	8	42	-576	744	168
2019	Migrated OUT to	401	1,173	1,574	396	344	136	314	1,023	3,786	145	232	1,088	1,465	957	2,858	148	51	179	9,443	638	10,081
	Migrated IN from	417	987	1,404	258	350	153	250	1,166	3,581	145	175	847	1,167	937	2,889	154	38	142	8,908	1,782	10,690
	NET	16	-185	-169	-138	6	17	-64	142	-205	0	-57	-242	-299	-20	31	7	-13	-36	-535	1,144	609

Sources:

Internal: ONS detailed estimates of by origin and destination by local authorities age and sex

International: ONS Detailed time series 2001 -2019 (Table: MYEB2)

Table 2.15 Summary of national and international migration by year group and age group

PERIOD	AGE GROUP	Preston	CENTRAL LANCs			LANCASHIRE						GREATER MANCHESTER				OTHER NEIGHBOURING AREAS / ELSEWHERE UK					TOTAL (UK internal)	International	TOTAL (Internal & international)	
			Chorley	South Ribble	Central Lancs TOTAL	Fylde	Ribble Valley	West Lancashire	Wyre	Rest of Lancashire	Lancashire TOTAL	Wigan	Bolton	Rest of Greater Manchester	Greater Manchester TOTAL	Rest of North West Region	ENGLAND (rest of)	SCOTLAND	NORTHERN IRELAND	WALES				
2011-2013	<30	Migrated OUT to	700	1,926	2,626	444	400	190	399	1,686	5,744	375	396	2,060	2,831	2,090	6,153	330	104	355	17,607	1,533	19,140	
		Migrated IN from	394	1,423	1,817	333	388	219	409	2,065	5,231	375	454	2,180	3,009	2,484	6,032	238	154	349	17,498	2,938	20,436	
		NET	-306	-502	-809	-111	-12	29	10	380	-513	0	58	120	178	394	-121	-91	51	-6	-109	1,405	1,296	
	30-64	Migrated OUT to	483	1,400	1,883	435	343	73	352	808	3,895	126	118	470	714	488	1,651	204	27	102	7,081	1,154	8,235	
		Migrated IN from	265	1,031	1,295	253	307	76	247	877	3,056	93	109	351	553	393	1,265	117	41	81	5,506	758	6,264	
		NET	-219	-369	-588	-182	-36	3	-105	69	-838	-33	-9	-118	-161	-95	-387	-87	13	-21	-1,575	-396	-1,971	
	65+	Migrated OUT to	72	244	316	125	77	10	106	107	741	6	3	25	34	51	209	26	4	15	1,080	57	1,137	
		Migrated IN from	55	167	222	40	79	10	52	72	475	3	7	37	47	57	115	15	0	14	724	55	779	
		NET	-17	-77	-94	-85	2	0	-54	-35	-266	-4	5	11	13	7	-94	-11	-4	-1	-356	-2	-358	
	2014-2016	<30	Migrated OUT to	687	1,948	2,635	496	522	248	493	1,738	6,131	394	424	2,415	3,233	2,352	6,059	337	114	356	18,582	1,758	20,340
			Migrated IN from	530	1,431	1,961	408	382	233	456	2,069	5,509	358	520	2,194	3,072	2,375	5,843	303	128	412	17,642	3,477	21,119
			NET	-157	-517	-673	-88	-140	-15	-38	331	-622	-36	96	-221	-161	22	-216	-34	14	56	-940	1,719	779
30-64		Migrated OUT to	545	1,692	2,237	542	418	85	400	789	4,472	105	107	506	717	508	1,565	197	39	119	7,617	1,404	9,021	
		Migrated IN from	391	1,066	1,456	333	328	74	291	985	3,466	79	114	399	592	452	1,550	132	10	80	6,282	1,084	7,366	
		NET	-155	-626	-781	-209	-90	-11	-109	196	-1,005	-26	8	-107	-125	-56	-15	-65	-29	-39	-1,335	-320	-1,655	
65+		Migrated OUT to	111	289	399	171	127	15	134	81	927	8	8	30	46	82	181	35	3	11	1,286	109	1,395	
		Migrated IN from	81	279	360	61	79	17	72	101	688	6	9	57	72	48	152	17	5	22	1,003	80	1,083	
		NET	-30	-10	-39	-110	-48	2	-63	20	-239	-3	2	27	26	-35	-30	-18	2	10	-283	-29	-312	
2017-2019		<30	Migrated OUT to	600	1,694	2,294	450	488	244	411	1,885	5,772	341	422	2,469	3,232	2,117	6,526	236	86	369	18,338	1,742	20,080
			Migrated IN from	565	1,328	1,894	380	534	296	397	2,112	5,611	306	424	2,176	2,906	2,118	6,394	235	112	373	17,750	3,725	21,475
			NET	-35	-366	-401	-71	46	52	-14	227	-161	-35	2	-293	-326	1	-132	-1	26	4	-588	1,983	1,395
	30-64	Migrated OUT to	511	1,571	2,082	510	356	79	426	918	4,371	104	179	671	954	692	1,877	171	39	136	8,240	1,239	9,479	
		Migrated IN from	436	1,172	1,608	332	409	101	248	1,169	3,866	118	138	584	840	660	2,090	128	21	114	7,720	1,270	8,990	
		NET	-75	-399	-474	-178	53	22	-179	251	-505	14	-41	-87	-113	-31	213	-43	-18	-22	-520	31	-489	
	65+	Migrated OUT to	126	322	448	188	113	19	157	106	1,032	6	15	31	52	90	246	26	3	15	1,464	71	1,535	
		Migrated IN from	93	300	393	75	84	21	55	108	736	8	19	44	71	73	167	31	4	14	1,096	85	1,181	
		NET	-33	-22	-55	-113	-29	2	-103	2	-297	1	5	13	19	-17	-79	5	1	-1	-368	14	-354	

Sources:

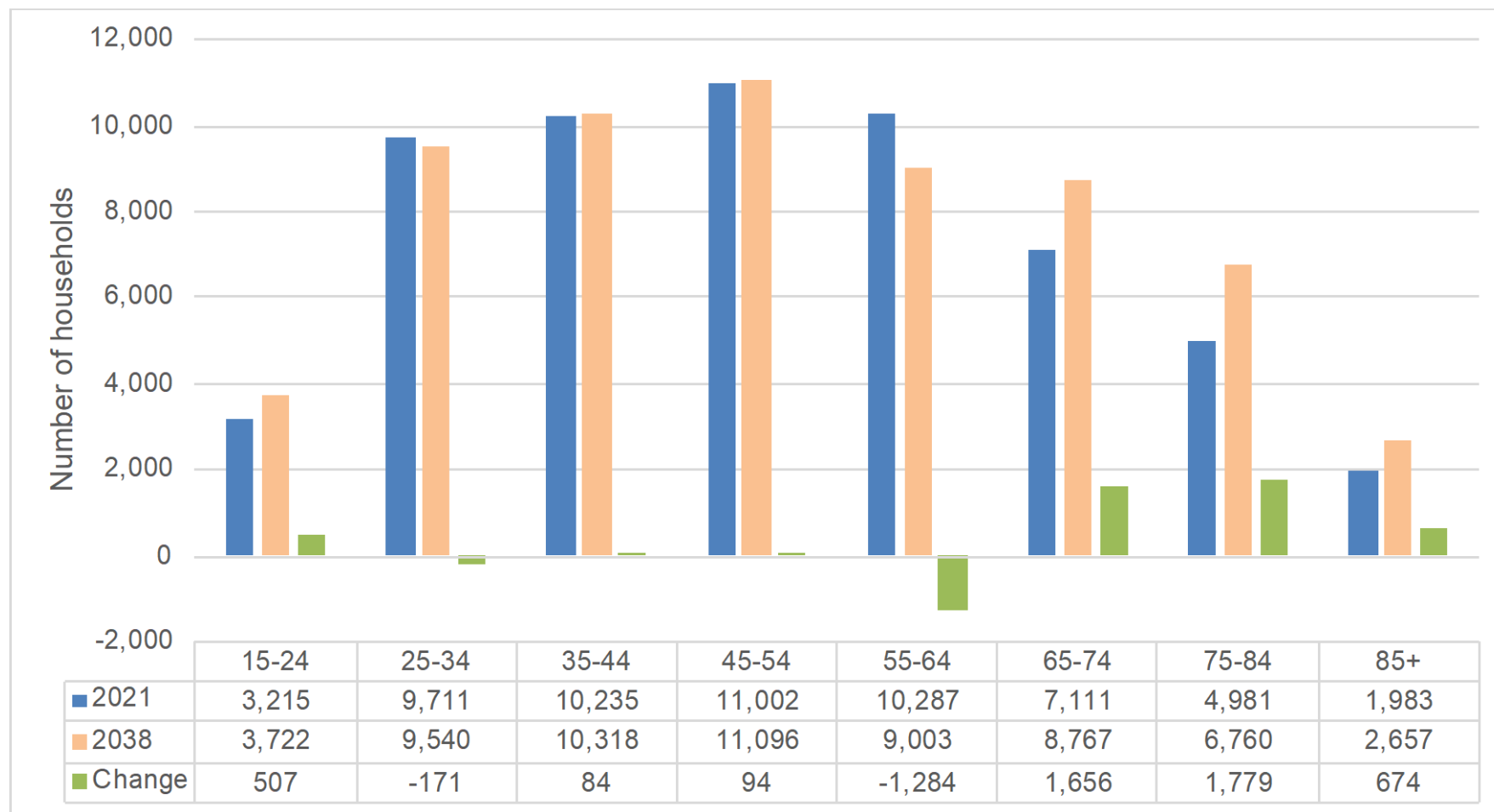
Internal: ONS detailed estimates of by origin and destination by local authorities age and sex

International: ONS Detailed time series 2001 -2019 (Table: MYEB2)

Household projections

- 2.37 The ONS produces household projections which are based on population projections. The ONS estimates the proportions of people who are likely to be household reference people by age, gender and household type based on census data. Variant household projections are also produced.
- 2.38 According to the 2018-based principal ONS household projections there are 58,524 households across the city in 2021 and this is projected to increase by 3,338 (5.7%) to 61,863 by 2038.
- 2.39 Table 2.16 provides a detailed breakdown of household type by the age of Household Reference Person to 2038. Currently available data shows that the overall household type profile is not expected to change over the 2021 to 2038 period, with the dominant household types being 'other households' with two or more adults and 'one person' households. However, as illustrated in Figure 2.3, there will be a marked increase in the number of households where the Household Reference Person is aged 65 or over.

Figure 2.3 Profile of households by age of Household Reference Person 2021 and 2038 projections



Source: 2018-based ONS household projections

Table 2.16a Household types and change 2021 (HRP = Household Reference Person)

Household type	HRP age 15-24	HRP age 25-34	HRP age 35-44	HRP age 45-54	HRP age 55-64	HRP age 65-74	HRP age 75-84	HRP age 85+	TOTAL	%
One Person	1,292	3,251	3,403	3,700	3,800	3,046	2,416	1,294	22,202	37.9%
Household with 1 dependent child	611	1,833	1,928	1,827	854	186	60	14	7,313	12.5%
Household with 2 dependent children	234	1,295	1,973	1,402	359	28	5	0	5,295	9.0%
Household with 3 or more dependent children	112	888	1,252	565	98	10	4	1	2,931	5.0%
Other households with two or more adults	967	2,444	1,678	3,508	5,176	3,841	2,496	674	20,784	35.5%
Total	3,215	9,711	10,235	11,002	10,287	7,111	4,981	1,983	58,524	100.0%

Table 2.16b Household types and change 2038 (HRP = Household Reference Person)

Household type	HRP age 15-24	HRP age 25-34	HRP age 35-44	HRP age 45-54	HRP age 55-64	HRP age 65-74	HRP age 75-84	HRP age 85+	TOTAL	%
One Person	1,496	3,214	3,443	3,702	3,309	3,734	3,243	1,709	23,849	38.6%
Household with 1 dependent child	710	1,789	1,914	1,858	737	226	82	18	7,334	11.9%
Household with 2 dependent children	272	1,263	1,996	1,464	307	34	7	0	5,344	8.6%
Household with 3 or more dependent children	131	861	1,262	590	81	12	6	2	2,944	4.8%
Other households with two or more adults	1,114	2,413	1,703	3,482	4,569	4,761	3,423	929	22,392	36.2%
Total	3,722	9,540	10,318	11,096	9,003	8,767	6,760	2,657	61,863	100.0%

Table 2.16c Household types and change 2021 to 2038 (HRP = Household Reference Person)

Household type	HRP age 15-24	HRP age 25-34	HRP age 35-44	HRP age 45-54	HRP age 55-64	HRP age 65-74	HRP age 75-84	HRP age 85+	TOTAL	%
One Person	204	-36	40	1	-491	688	827	415	1,647	49.3%
Household with 1 dependent child	99	-45	-14	31	-117	40	22	5	21	0.6%
Household with 2 dependent children	38	-31	23	62	-52	6	2	0	49	1.5%
Household with 3 or more dependent children	18	-27	10	25	-17	2	1	1	13	0.4%
Other households with two or more adults	147	-32	25	-26	-607	920	927	254	1,608	48.2%
Total	507	-171	84	94	-1,284	1,656	1,779	674	3,338	100.0%

Source: 2018-based ONS household projections

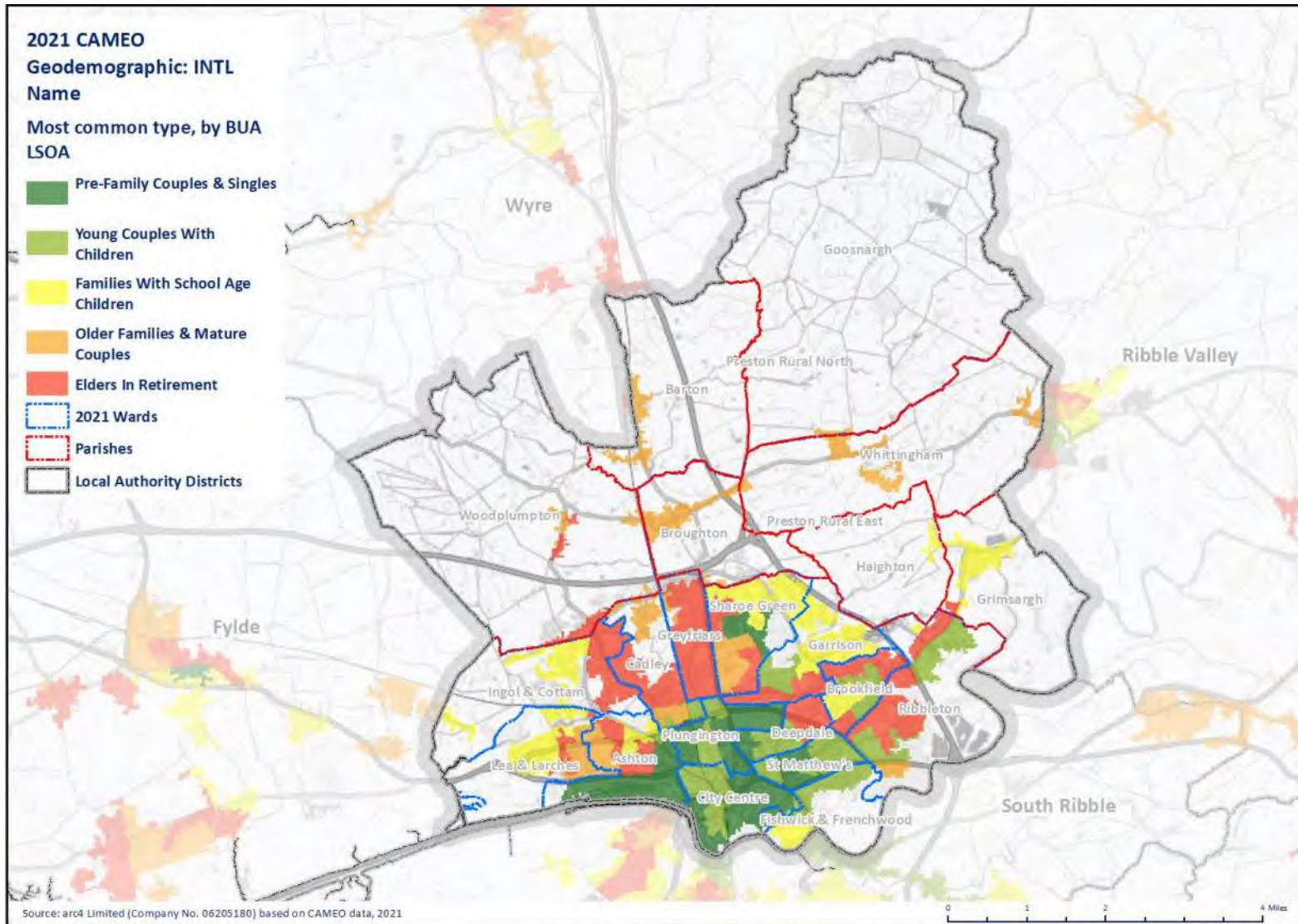
Defining the Housing Market Area

- 2.40 PPG asks councils to consider the extent to which their local authority area is a self-contained housing market area. This remains an important consideration for the council as the degree of interaction may require policy responses.
- 2.41 Considerable work which considers migration and travel to work data has been carried out in other studies which demonstrate that the City of Preston is part of a wider Central Lancashire Housing Market Area. For instance, the 2020 Central Lancashire Housing Study concluded that 'the SHMA definition of the Central Lancashire HMA as comprising Preston, Chorley and South Ribble' remains appropriate.

General household characteristics

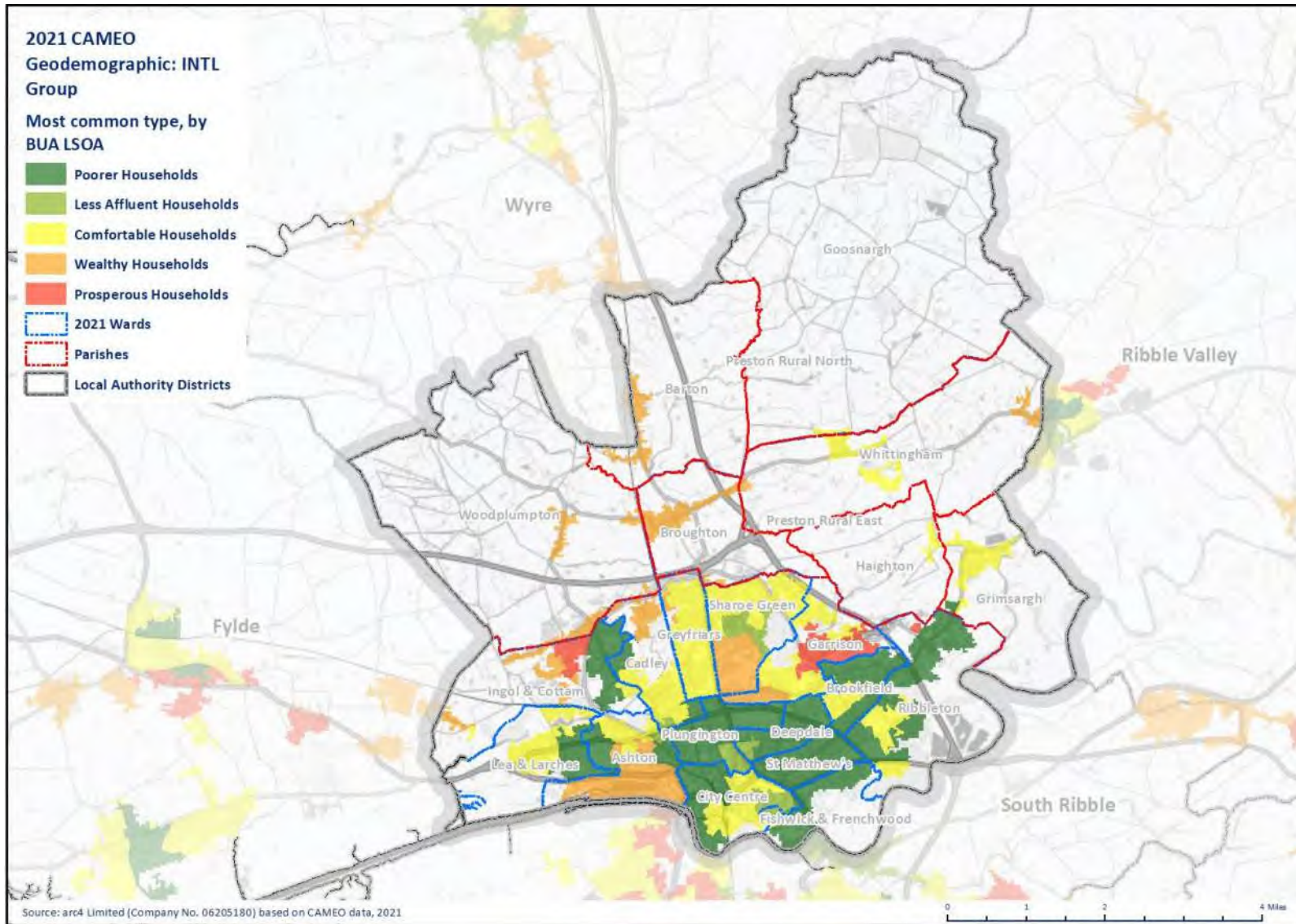
- 2.42 The range of households living in the City of Preston is illustrated in Maps 2.3 and 2.4. Map 2.3 illustrates the distribution of key household typologies and indicates a predominance of younger household groups in the inner urban areas of Preston, families and older groups in suburban and rural areas.
- 2.43 Map 2.4 considers income groups, broadly illustrating that higher income groups live in rural and suburban areas and lower income groups in urban areas.

Map 2.3 Household characteristics: household type by LSOA, 2021



Source: CAMEO UK

Map 2.4 Household characteristics: income type, by LSOA, 2021



Source: CAMEO UK

Income data

- 2.44 There are a range of income data sources available to inform this study which are now summarised. 2021 CAMEO income data provide range, quartile and average data of gross household income by sub-area. ONS Annual Survey of Hours and Earnings data provides gross earnings of economically active residents at district level.
- 2.45 Table 2.17 summarises gross income by sub-area using 2020 CAMEO UK data and indicates a city-wide lower quartile household income of £15,000 and an average of £26,796.
- 2.46 The 2021 Annual Survey of Hours and Earnings resident-based data indicates lower quartile earnings are £21,333, median earnings are £27,425 and average earnings are £31,910 across the City of Preston.

Table 2.17 Gross household income by sub-area, ward and rural parish

Sub-area	Ward	Annual gross household income								Lower Quartile	Median	Average
		<£10k	£10k to <£20k	£20k - <£30k	£30k- <£40k	£40k- <£50k	£50k- <£75k	£75k or more	Total			
Central	City Centre	18.0%	60.9%	17.6%	3.4%	0.1%	0.0%	0.0%	100.0%	£5,000	£15,000	£15,447
	Deepdale	4.5%	86.5%	8.7%	0.2%	0.1%	0.0%	0.0%	100.0%	£15,000	£15,000	£15,625
	Fishwick & Frenchwood	15.6%	69.4%	12.7%	1.9%	0.0%	0.4%	0.0%	100.0%	£15,000	£15,000	£15,625
	Plungington	15.3%	53.4%	28.3%	3.0%	0.1%	0.0%	0.0%	100.0%	£5,000	£15,000	£16,675
	St Matthew's	22.7%	69.9%	7.3%	0.1%	0.1%	0.0%	0.0%	100.0%	£5,000	£15,000	£13,586
	TOTAL		15.7%	66.8%	15.4%	1.8%	0.1%	0.1%	0.0%	100.0%	£5,000	£15,000
East	Brookfield	7.4%	65.0%	23.7%	2.3%	1.6%	0.0%	0.0%	100.0%	£15,000	£15,000	£17,197
	Ribbleton	8.8%	68.4%	15.6%	6.7%	0.5%	0.0%	0.0%	100.0%	£15,000	£15,000	£16,173
	TOTAL	8.2%	66.8%	19.4%	4.6%	1.0%	0.0%	0.0%	100.0%	£15,000	£15,000	£16,633
North	Cadley	4.0%	20.4%	37.1%	21.9%	9.7%	6.4%	0.5%	100.0%	£15,000	£25,000	£29,877
	Garrison	7.4%	9.3%	14.7%	17.9%	30.2%	20.2%	0.3%	100.0%	£25,000	£35,000	£38,333
	Greyfriars	0.0%	4.6%	16.6%	48.9%	21.7%	8.2%	0.0%	100.0%	£35,000	£35,000	£38,364
	Sharoe Green	4.0%	6.3%	13.8%	47.0%	24.0%	4.8%	0.1%	100.0%	£25,000	£35,000	£35,172
	TOTAL	3.9%	10.4%	21.0%	33.7%	21.1%	9.7%	0.2%	100.0%	£25,000	£35,000	£35,621
West	Ashton	1.5%	14.2%	40.1%	22.8%	14.9%	6.5%	0.0%	100.0%	£25,000	£25,000	£31,500
	Ingol & Cottam	9.8%	42.4%	9.4%	7.8%	18.3%	12.2%	0.1%	100.0%	£15,000	£25,000	£31,563
	Lea & Larches	4.0%	49.4%	21.3%	13.6%	11.3%	0.5%	0.0%	100.0%	£15,000	£15,000	£23,697
	TOTAL	5.0%	34.9%	24.1%	15.0%	14.8%	6.3%	0.0%	100.0%	£15,000	£25,000	£28,961
Sub-area	Parish	Annual gross household income								Lower Quartile	Median	Average
		<£10k	£10k to <£20k	£20k - <£30k	£30k- <£40k	£40k- <£50k	£50k- <£75k	£75k or more	Total			
Rural East	Broughton	0.0%	12.5%	29.5%	14.0%	26.9%	14.5%	2.5%	100.0%	£25,000	£45,000	£44,898
	Grimstargh	0.0%	0.0%	13.8%	24.4%	37.0%	24.7%	0.1%	100.0%	£35,000	£45,000	£45,909
	Haighton	0.0%	0.0%	0.0%	6.7%	28.0%	50.7%	14.7%	100.0%	£35,000	£45,000	£56,250
	Whittingham	0.0%	0.1%	8.3%	36.9%	35.7%	18.5%	0.5%	100.0%	£35,000	£45,000	£42,091
	TOTAL	0.0%	3.6%	16.1%	24.8%	33.5%	20.7%	1.3%	100.0%	£35,000	£45,000	£44,712
Rural North	Barton	0.8%	0.0%	0.0%	21.3%	47.9%	28.7%	1.2%	100.0%	£42,500	£45,000	£50,147
	Goosnargh	0.0%	0.0%	0.4%	23.1%	34.5%	39.8%	2.2%	100.0%	£35,000	£45,000	£52,031
	Woodplumpton	1.5%	0.0%	0.1%	19.4%	28.8%	43.5%	6.7%	100.0%	£45,000	£45,000	£50,742
	TOTAL	0.9%	0.0%	0.2%	20.9%	35.4%	38.6%	4.1%	100.0%	£45,000	£45,000	£50,983
Preston		8.6%	41.7%	18.6%	14.1%	10.9%	5.8%	0.2%	100.0%	£15,000	£25,000	£26,796

Source: CAMEO UK 2021. Note: data is show for broad income bands and sometime lower quartile and median earnings fall within the same band.

Summary

- 2.47 Across the City of Preston there are an estimated 65,220 dwellings and 58,524 households and 4.3% of dwellings are vacant.
- 2.48 In terms of dwelling stock:
- 60.6% of occupied dwellings are owner occupied, 19.5% are private rented and 19.9% are affordable (including social/affordable renting and shared ownership);
 - 73.6% of dwellings are houses (34.5% terraced, 25.5% semi-detached and 13.6% detached), 20.1% are flats and 6.2% are bungalows; and
 - 12.1% of dwellings have one bedroom, 26.5% two bedrooms, 47.6% three bedrooms and 13.9% four or more bedrooms; and
 - 43% of dwellings were built before 1945, 32.2% between 1945 and 1982 and 24.8% since 1983. An estimated 18.9% of all dwelling stock is non-decent.
- 2.49 Over the 11 years 2010/11 to 2020/21, 5,372 net new dwellings have been built across the City of Preston. In the past 5 years to 2020/21, an annual net average of 773 dwellings have been built across the city.
- 2.50 The population in 2021 was 142,960 and this is projected to increase by 4,658 to 147,970 by 2038, with the largest increases across older age groups. Latest 2018-based ONS household projections suggest a total of 58,524 households in 2021 and this is projected to increase by 3,338 (5.7%) to 61,863 by 2038. Largest increases will be one person and other households with two or more adults, and households with a Household Reference Person aged 65 and over.
- 2.51 An analysis of migration flows indicates a general net outflow to other areas, mainly in the North West with a particular emphasis of flows to elsewhere in Central Lancashire and Fylde. International migration has helped to sustain population and a key driver in the growth of the under 30 population across the City of Preston.
- 2.52 Existing studies have demonstrated that the City of Preston is part of the Central Lancashire Housing Market Area.

3. Price, rents and affordability

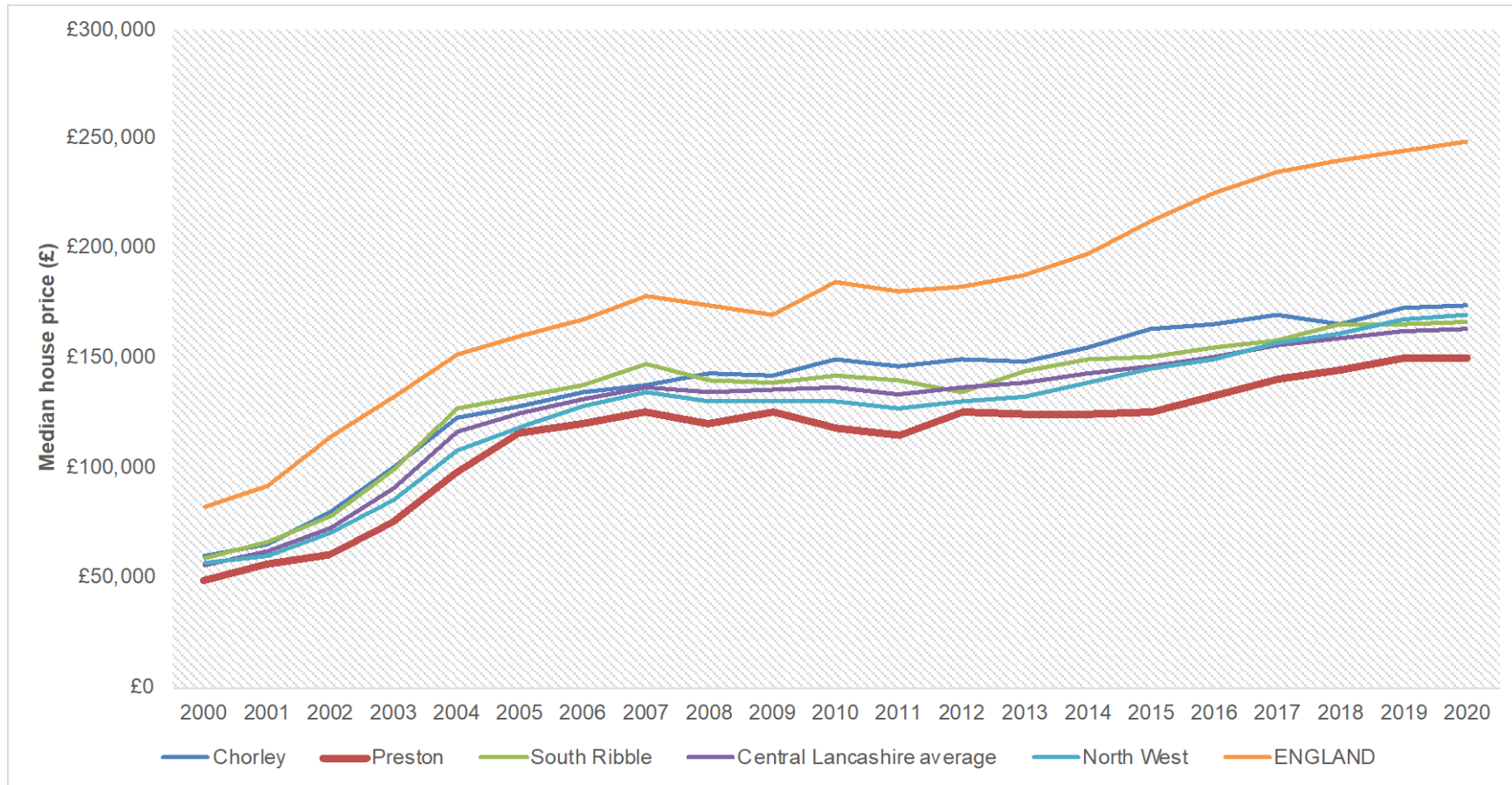
Introduction

- 3.1 This chapter sets out the cost of buying and renting properties across the City of Preston. The affordability of tenure options is then considered with reference to local incomes along with the incomes of key workers and households on minimum/living wages. Data relates to 2020 and therefore does not take into account any market or income changes relating to the COVID-19 pandemic.

House price trends

- 3.2 Figure 3.1 shows how house prices in the City of Preston have changed over the years 2000 to 2020, based on full-year Land Registry price paid data. This is compared with the Central Lancashire authorities and England.
- 3.3 Median house prices across the City of Preston have consistently been lower than other areas of Central Lancashire, the North West and England. Overall, median prices have increased from £49,011 in 2000 to £150,000 in 2020, an increase of +205.7%. LQ prices have increased from £34,000 in 2000 to £98,000 in 2020. Tables 3.1 and 3.2 show how price change in the City of Preston compares with its neighbouring areas, the region and England.

Figure 3.1 Median house price trends 2000 to 2020: City of Preston, Central Lancashire, North West and England



Source: Data produced by Land Registry © Crown copyright 2021

Table 3.1 Comparative median house price change 2000-2020 with neighbouring districts, North West and England

Location	Median Price (£) 2000	Median Price (£) 2020	% Change 2000-2020
ENGLAND	£82,000	£249,000	203.7
Ribble Valley	£68,500	£231,000	237.2
Fylde	£71,500	£205,000	186.7
West Lancashire	£69,950	£184,950	164.4
Chorley	£60,000	£174,500	190.8
North West	£56,500	£170,000	200.9
South Ribble	£58,500	£167,000	185.5
Wyre	£60,000	£164,500	174.2
Central Lancashire	£55,837	£163,833	193.4
City of Preston	£49,011	£150,000	206.1
Wigan	£49,000	£147,000	200.0
Bolton	£46,950	£145,000	208.8

Source: Data produced by Land Registry © Crown copyright 2021

Table 3.2 Comparative lower quartile (LQ) house price change 2000-2020 with neighbouring districts, North West and England

Location	LQ Price (£) 2000	LQ Price (£) 2020	% Change 2000-2020
Ribble Valley	£48,500	£166,000	242.3
ENGLAND	£54,000	£164,000	203.7
Fylde	£52,500	£146,000	178.1
West Lancashire	£52,500	£137,000	161.0
South Ribble	£45,000	£130,000	188.9
Chorley	£44,000	£128,500	192.0
Wyre	£46,500	£125,000	168.8
North West	£37,000	£119,448	222.8
Central Lancashire	£41,000	£118,833	189.8
Wigan	£33,000	£105,000	218.2
Bolton	£30,000	£102,500	241.7
City of Preston	£34,000	£ 98,000	188.2

Source: Data produced by Land Registry © Crown copyright 2021

- 3.4 Table 3.3 sets out the change in house prices by settlement/parish over the period 2007 to 2020 (Note: Land Registry ward level analysis is only possible from 2007). During this period, median prices increased by +19% overall but varies considerably at ward/parish level. Table 3.3 also sets out LQ data for the same period, with an overall increase of +1.6% and considerable variation within the city.
- 3.5 Maps 3.1 and 3.2 provide an illustration of LQ and median prices using Lower Super Output Area. The maps show a range of market prices, with highest prices in rural areas and lowest in the inner urban areas of Preston.

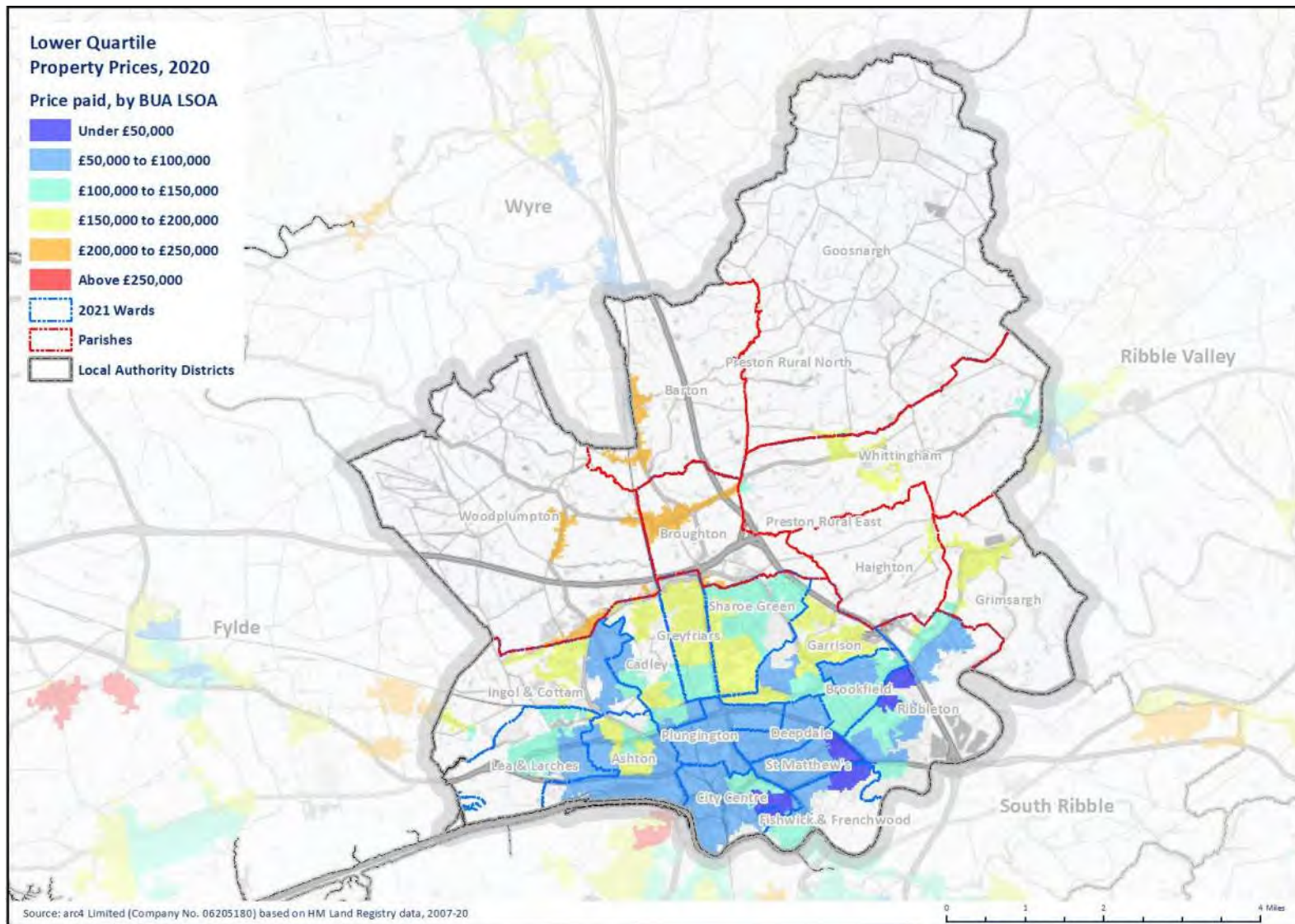
Table 3.3 Comparative lower quartile and median house price change 2007-2020 for sub-areas, wards and rural parishes

Sub-area	Ward/Parish	LQ price 2007	LQ price 2020	LQ price % change	Median price 2007	Median price 2020	Median price % change
Central	City Centre	£95,500	£75,000	-21.5%	£120,000	£108,500	-9.6%
Central	Deepdale	£80,000	£73,375	-8.3%	£94,000	£88,000	-6.4%
Central	Fishwick & Frenchwood	£72,000	£55,000	-23.6%	£89,000	£75,500	-15.2%
Central	Plungington	£97,500	£80,000	-17.9%	£118,000	£97,500	-17.4%
Central	St Matthew's	£73,750	£52,500	-28.8%	£84,000	£68,500	-18.5%
CENTRAL	TOTAL	£84,500	£68,000	-19.5%	£103,000	£87,000	-15.5%
East	Brookfield	£84,750	£100,000	18.0%	£107,250	£122,000	13.8%
East	Ribbleton	£88,000	£85,625	-2.7%	£108,500	£109,500	0.9%
EAST	TOTAL	£86,500	£94,250	9.0%	£108,000	£117,000	8.3%
North	Cadley	£115,000	£109,963	-4.4%	£137,500	£148,750	8.2%
North	Garrison	£158,625	£155,000	-2.3%	£190,000	£201,000	5.8%
North	Greyfriars	£165,250	£160,000	-3.2%	£189,850	£188,249	-0.8%
North	Sharoe Green	£137,875	£145,000	5.2%	£161,000	£183,750	14.1%
NORTH	TOTAL	£138,750	£145,000	4.5%	£170,000	£178,000	4.7%
West	Ashton	£108,875	£96,000	-11.8%	£125,000	£133,250	6.6%
West	Ingol & Cottam	£100,250	£116,950	16.7%	£139,975	£187,000	33.6%
West	Lea & Larches	£105,963	£98,000	-7.5%	£126,500	£125,000	-1.2%
WEST	TOTAL	£105,988	£100,000	-5.6%	£129,975	£134,950	3.8%
Rural East	Broughton	£215,000	£216,249	0.6%	£262,500	£260,000	-1.0%
Rural East	Grimstargh	£166,238	£177,000	6.5%	£221,000	£225,000	1.8%
Rural East	Haighton	£183,750	#	#	£319,500	#	#
Rural East	Whittingham	£165,000	£180,000	9.1%	£214,250	£250,000	16.7%
RURAL EAST	TOTAL	£175,500	£186,500	6.3%	£225,000	£237,498	5.6%
Rural North	Barton	£248,000	£187,000	-24.6%	£290,000	£264,950	-8.6%
Rural North	Goosnargh	£284,800	£425,000	49.2%	£411,000	£490,000	19.2%
Rural North	Woodplumpton	£193,750	£205,000	5.8%	£332,500	£249,950	-24.8%
RURAL NORTH	TOTAL	£241,875	£208,000	-14.0%	£333,250	£253,000	-24.1%
PRESTON	TOTAL	£96,500	£98,000	1.6%	£126,000	£150,000	19.0%

Source: Data produced by Land Registry © Crown copyright 2021. # Too few sales

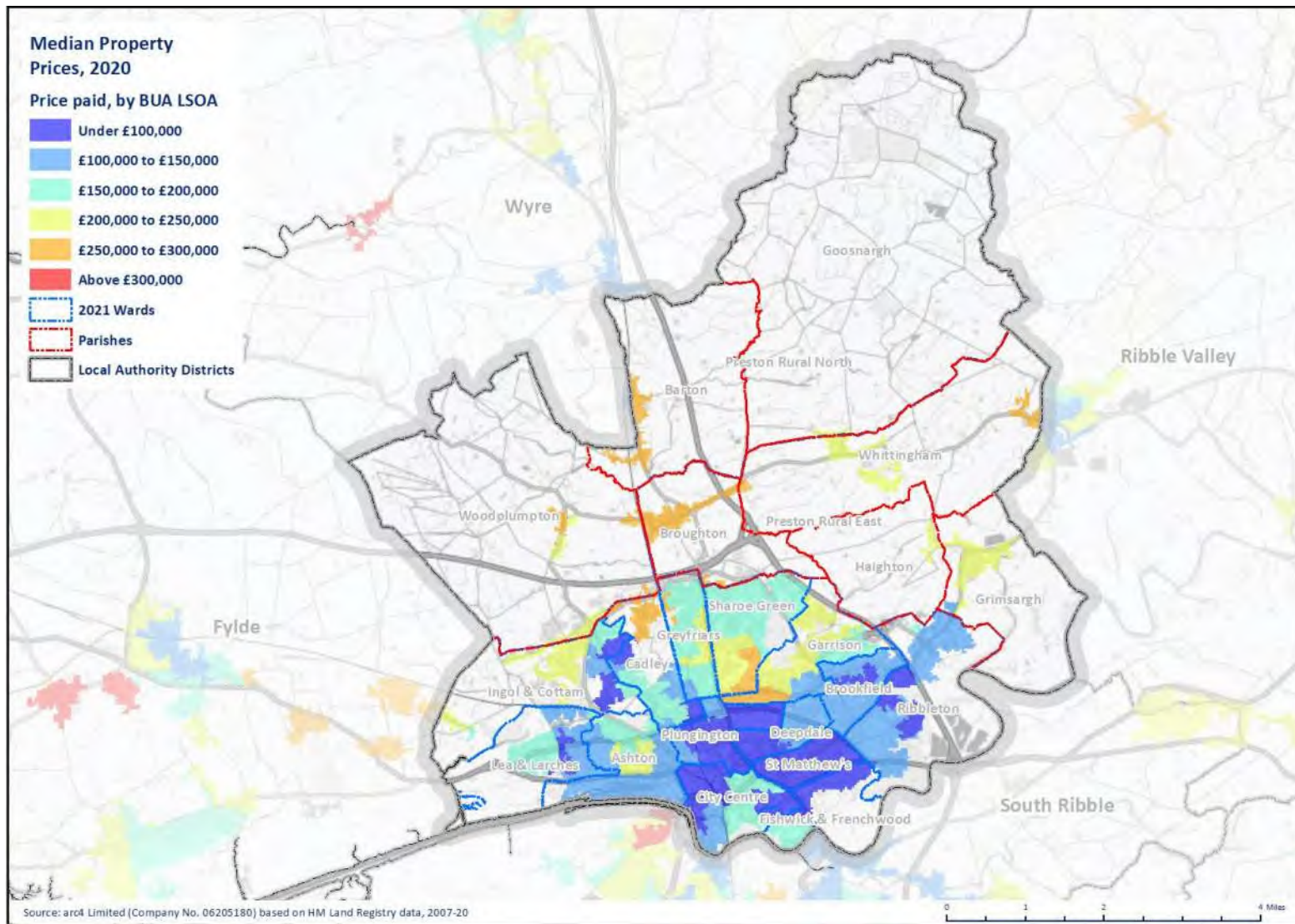
Note: 2021 Preston sales data - lower quartile £98,000 and median £145,000

Map 3.1 Lower quartile house prices 2020 by built-up areas within the LSOAs of the City of Preston



Source: Data produced by Land Registry © Crown copyright 2021

Map 3.2 Median house prices 2020 by built-up areas within the LSOAs of the City of Preston



Source: Data produced by Land Registry © Crown copyright 2021

Private renting

- 3.6 Table 3.4 provides an overview of the cost of renting privately across the City of Preston and compares prices with the North West and England over the period 2010 to 2020. Over this time lower quartile rents have increased by 4.7% and median rents have increased by 13.4%. These increases are below those experienced across the North West and England. Table 3.5 summarises 2020 price data by sub-areas, wards and rural parishes.

Table 3.4 Comparative lower quartile and median rental price 2010-2020

Location	Lower Quartile Price 2010	Lower Quartile Price 2020	Lower Quartile % change 2010-2020
City of Preston	£472	£494	4.7
North West	£472	£524	11.0
England	£598	£724	21.1
Location	Median Price 2010	Median Price 2020	Median % change 2010-2020
City of Preston	£524	£594	13.4
North West	£546	£676	23.8
England	£893	£1,148	28.6

Source: Zoopla PPD 2021

- 3.7 The private rented sector accommodates a proportion of low income households that are eligible for assistance with rental costs. Map 3.5 illustrates the proportion of households in receipt of housing benefit assistance across the city. This shows particular concentrations in the inner urban areas of Preston.

Table 3.5 Lower quartile and median rents by sub-area, ward and rural parish 2020

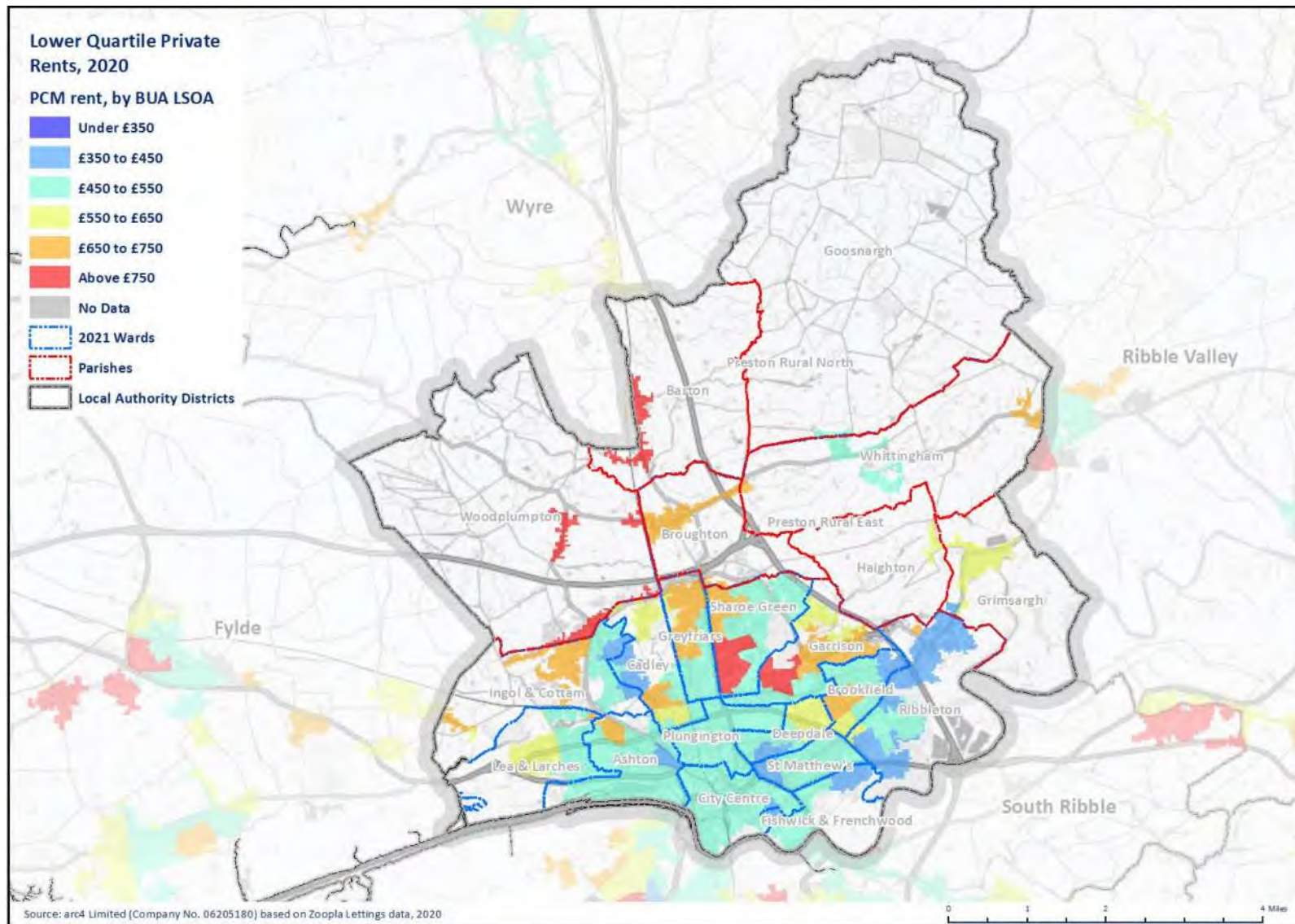
Sub-area	Ward/Parish	Lower quartile (£ each month)	Median (£ each month)
Central	City Centre	£498	£598
Central	Deepdale	£451	£589
Central	Fishwick & Frenchwood	£425	£494
Central	Plungington	£494	£594
Central	St Matthew's	£459	£498
CENTRAL	TOTAL	£477	£576
East	Brookfield	£550	£594
East	Ribbleton	£446	£537
EAST	TOTAL	£481	£576
North	Cadley	£494	£594
North	Garrison	£576	£693
North	Greyfriars	£598	£737
North	Sharoe Green	£550	£693
NORTH	TOTAL	£550	£676
West	Ashton	£494	£550
West	Ingol & Cottam	£454	£598
West	Lea & Larches	£524	£598
WEST	TOTAL	£494	£550
Rural East	Broughton	£722	£875
Rural East	Grimstargh	£536	£624
Rural East	Haighton	#	#
Rural East	Whittingham	£537	£624
RURAL EAST	TOTAL	£550	£693
Rural North	Barton	£793	£1,001
Rural North	Goosnargh	£748	£748
Rural North	Woodplumpton	£793	£849
RURAL NORTH	TOTAL	£793	£849
PRESTON	TOTAL	£494	£594
North West (region)	TOTAL	£524	£676
ENGLAND	TOTAL	£724	£1,148

Source: Zoopla PPD 2021

Too few rentals

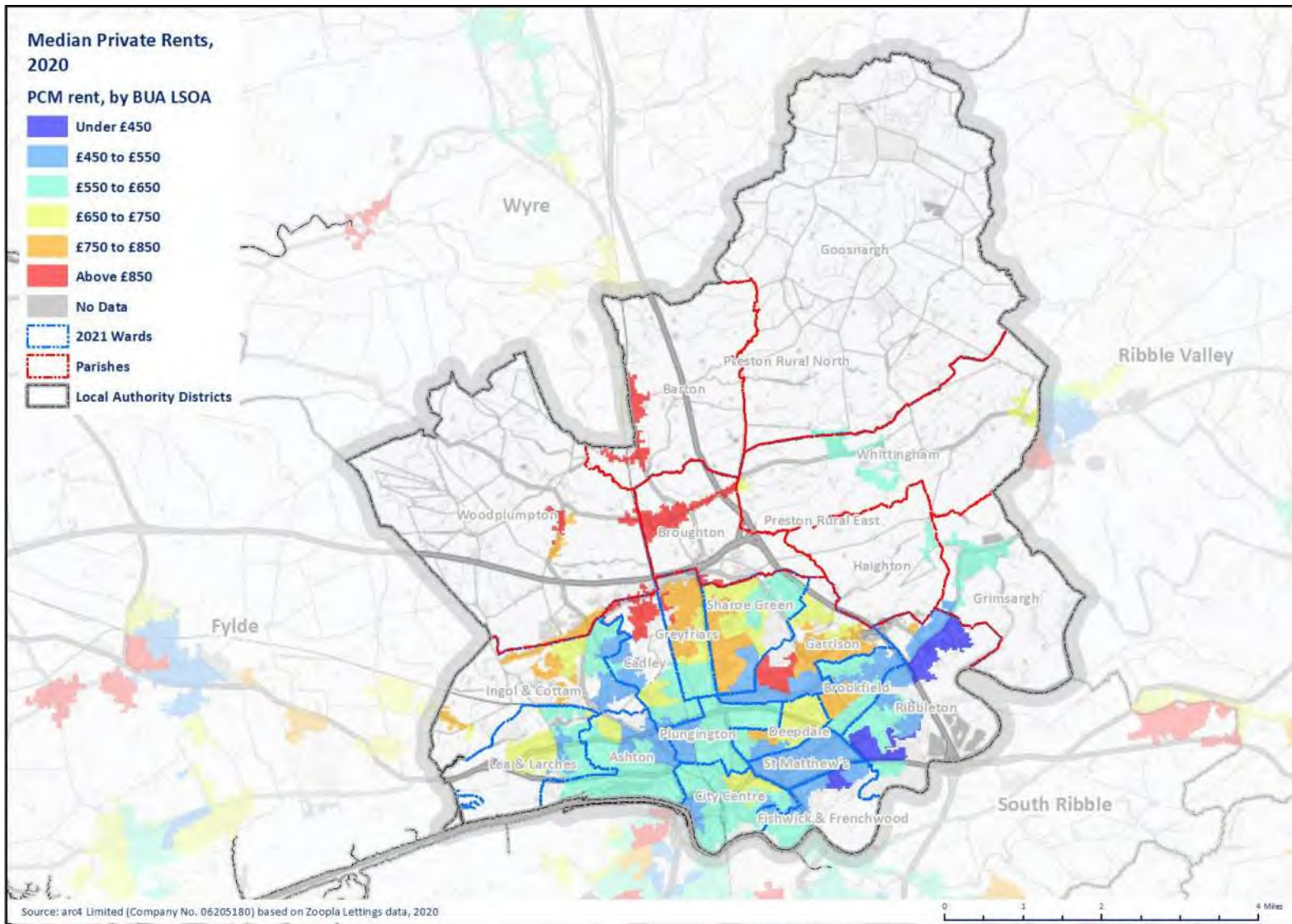
3.8 More detailed rental price data at a small area level (Lower Super Output Areas) are presented in Map 3.3 (lower quartile) and Map 3.4 (median). This illustrates rents are generally lower in inner urban areas and higher in suburban and rural areas.

Map 3.3 2020 lower quartile rents across the City of Preston by built up areas within LSOAs



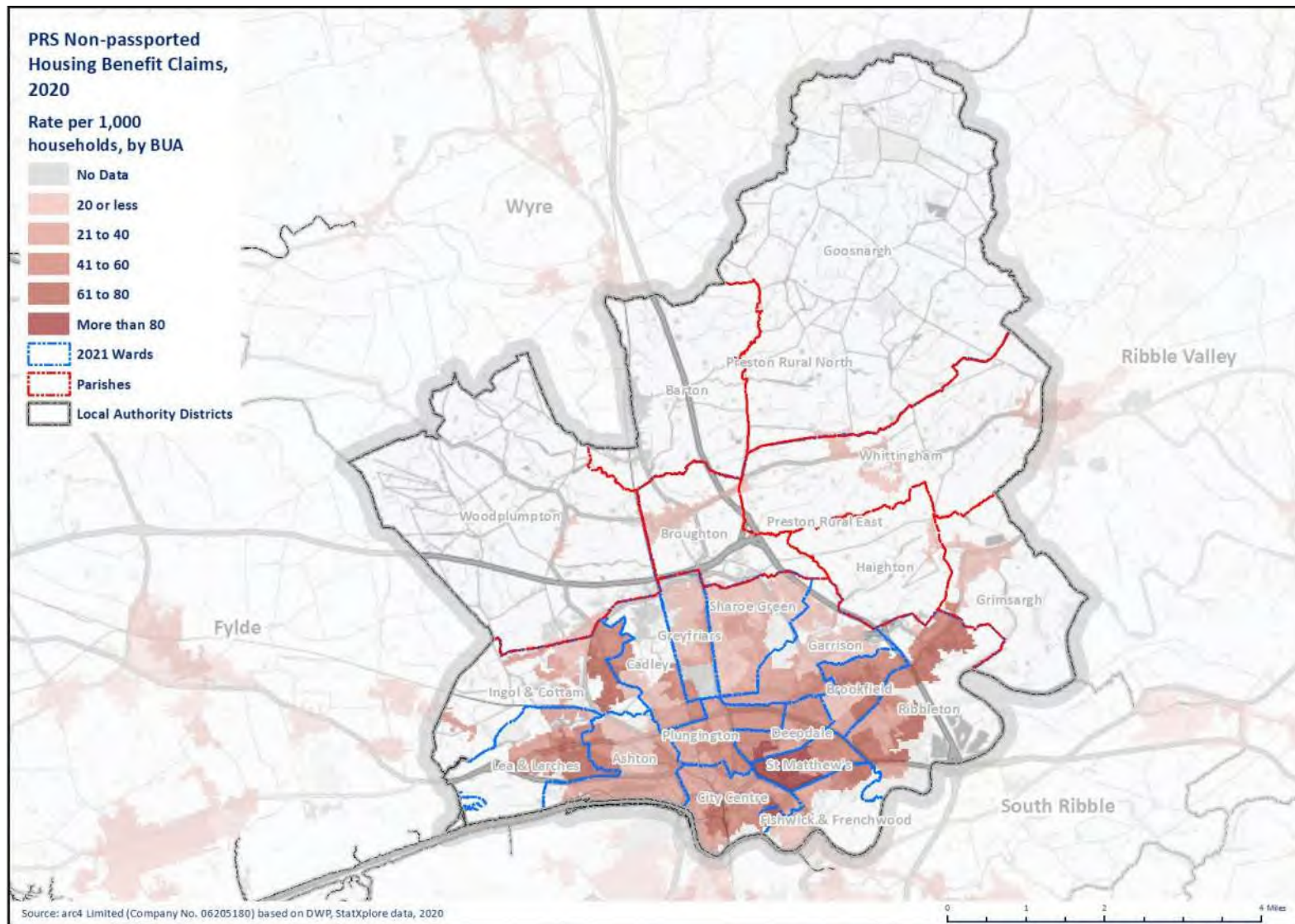
Source: Zoopla PPD 2021

Map 3.4 2020 median rents across the City of Preston by built up areas within LSOAs



Source: Zoopla PPD 2021

Map 3.5 Private rented sector Non-Passported Housing Benefit 2020



Source: 2021 DWP Stat explore

- 3.9 The amount that can be claimed for assistance with rental costs is capped to a local allowance that varies by area. The cap is estimated by the VOA and published in the form of a Local Housing Allowance (LHA) rate for a broad market area (BRMA). The City of Preston is located within the Central Lancashire BRMA. Table 3.6 summaries the LHA for the city and the variance between lower quartile rents and the LHA. This shows that LHA is not generally meeting the costs of renting lower quartile properties across the city.

Table 3.6 Broad Rental Market Area Local Housing Allowance Rates (April 2020)

No. of Bedrooms	Weekly LHA rate (£)	Monthly LHA rate (£)	2020 monthly LQ rent (£)	Variance between LQ rent and LHA
Shared Accommodation	£66.74	£289	£451	-£162
1 Bedroom	£90.90	£394	£394	£0
2 Bedroom	£110.47	£479	£498	-£19
3 Bedroom	£136.93	£593	£576	£17
4 Bedroom	£184.11	£798	£901	-£103

Source: Valuation Office Agency

NB: Figures in red represent a shortfall in LHA against LQ rent

Relative affordability

- 3.10 The ONS produces national data on the ratio of earnings to house prices. Two sets of data are available: workplace-based and resident-based. For each, lower quartile and median ratios are produced. The data are based on Land Registry Price Paid data and ONS Annual Survey of Hours and Earnings data.
- 3.11 Table 3.7 sets out the 2020 lower quartile and median affordability ratios for the City of Preston and compares these with neighbouring authorities, the North West and England. Using workplace-based median ratios to illustrate the data, prices are 5.57x income in the City of Preston. This ratio is lower than the regional and national ratios and lower than most neighbouring authorities.

Table 3.7 Relative affordability of lower quartile and median prices by local authority area, North West and England (workplace-based and residence-based)

Locality	2020 LQ Workplace-based	2020 LQ Residence-based	2020 Median Workplace-based	2020 Median Residence-based
Chorley	5.98	5.92	6.28	5.61
Preston	4.72	4.56	5.57	5.57
South Ribble	5.89	6.02	5.43	5.61
Fylde	6.42	5.54	5.83	5.68
Ribble Valley	6.44	7.28	6.03	6.66
West Lancashire	6.23	6.41	6.22	6.20
Wyre	6.65	5.97	6.29	6.04
Bolton	5.21	4.85	5.71	5.35
Wigan	5.28	4.78	5.61	4.92
North West	5.55	5.53	5.75	5.72
ENGLAND	7.15	7.15	7.84	7.84

Source: ONS

Relative affordability of housing tenure options and defining genuinely affordable housing

- 3.12 The relative cost of alternative housing options across the city and housing market sub-areas has been considered from two perspectives. Firstly, analysis considers prevailing prices at housing market sub-area level across a range of market and affordable tenures and the incomes required to afford these properties. Secondly, analysis considers what is genuinely affordable to households based on local incomes and assumptions around the proportion of income that should be spent on renting and the multiples of income for buying. The analysis of what is genuinely affordable also considers the incomes of selected key workers and those on minimum and living wages.
- 3.13 The thresholds for what is affordable and not affordable are as follows:
- For renting, 25% of gross household income is used as the ‘tipping point’ for affordability, with properties not affordable if more than 25% of income is spent on rent. There is no official guidance on what proportion of income should be used. Former CLG SHMA Practice Guidance (2007) recommended 25% and Shelter suggest using 35% of net income; and
 - For buying, affordability is based on a 3.5x gross household income multiple. Former CLG SHMA Practice Guidance (2007) recommended a 3.5x multiple for a household with a single earner and 2.9x for a dual earner.
- 3.14 Table 3.8 sets out the range of market and affordable tenures considered in analysis and any assumptions relating to the cost of properties. The cost of alternative affordable and market tenure options by sub-area is set out in Table 3.9. Table 3.9 also shows the gross household incomes needed to afford the tenure based on the 25% rental and 3.5x income multiples. Table 3.10 considers the impact of deposits on sale price.

Table 3.8 Summary of tenure (including affordable options), price assumptions and data sources

Tenure	Tenure price assumptions	Affordability assumptions	Data Source
Social rent	2020 average prices	25% of income	Regulator of Social Housing Statistical Data Return 2020
Affordable Rent	2020 average prices which are based on Local Housing Allowance rates	25% of income	Regulator of Social Housing Statistical Data Return 2020
Market Rent – lower quartile	2020 prices	25% of income	Zoopla 2020
Market Rent – median	2020 prices	25% of income	Zoopla 2020
Market Sale – lower quartile	2020 prices	90% LTV, 3.5x income	Land Registry Price Paid
Market Sale – median	2020 prices	90% LTV, 3.5x income	Land Registry Price Paid
Market Sale – average	2020 prices	90% LTV, 3.5x income	Land Registry Price Paid
Shared ownership (50%)	Total price based on median price and 50% ownership. Mortgage based on 40%. 10% deposit required; annual service charge £395, Annual rent based on 2.75% of remaining equity	90% LTV, 3.5x income for equity and 25% of income for rental element	Assumptions applied to Land Registry Price Paid data
Shared ownership (25%)	Total price based on median price and 25% ownership. Mortgage based on 20%, 5% deposit required, annual service charge £395. Annual rent based on 2.75% of remaining equity	90% LTV, 3.5x income for equity and 25% of income for rental element	Assumptions applied to Land Registry Price Paid data

Continued overleaf/...

Tenure	Tenure price assumptions	Affordability assumptions	Data Source
Help to buy	Total price based on median price. Mortgage based on 75% equity. 20% loan and deposit of 5%. Loan fee of 1.75% in year 6 of outstanding equity loan increasing annually from yr7 at RPI+1%	70% LTV, 3.5x income	Assumptions applied to Land Registry Price Paid data
Discounted home ownership 30%	70% of median price (note this is comparable to the proposed government <u>First Home</u> tenure option). Mortgage based on discounted price, minus 10% deposit on discounted price.	Discounted home ownership 30%	Assumptions applied to Land Registry Price Paid data
Discounted home ownership 25%	75% of median price mortgage based on discounted price, minus 10% deposit on discounted price.	Discounted home ownership 25%	Assumptions applied to Land Registry Price Paid data
Discounted home ownership 20%	80% of median price mortgage based on discounted price, minus 10% deposit on discounted price.	Discounted home ownership 20%	Assumptions applied to Land Registry Price Paid data

Table 3.9 Cost of alternative tenures and income required by sub-area and City of Preston

Tenure option	Price (2020) by sub-area						
	Preston City	Central	East	North	West	Rural East	Rural North
Social Rent (average)	£337	£337	£337	£337	£337	£337	£337
Affordable Rent (monthly cost)	£475	£461	£461	£541	£440	£554	£679
Market Rent - Lower Quartile	£494	£477	£481	£550	£494	£550	£793
Market Rent - Median	£594	£576	£576	£676	£550	£693	£849
Market Rent - Average	£744	£772	£595	£717	£620	£754	£940
Market Sale - Lower Quartile	£91,000	£68,000	£94,250	£145,000	£100,000	£186,500	£208,000
Market Sale - Median	£135,000	£87,000	£117,000	£178,000	£134,950	£237,498	£253,000
Market Sale - Average	£181,540	£137,297	£119,414	£206,827	£164,668	£296,074	£319,829
Shared ownership (50%)	£67,500	£43,500	£58,500	£89,000	£67,475	£118,749	£126,500
Shared ownership (25%)	£33,750	£21,750	£29,250	£44,500	£33,738	£59,374	£63,250
Help to buy	£135,000	£87,000	£117,000	£178,000	£134,950	£237,498	£253,000
Discounted Home Ownership (30%)	£94,500	£60,900	£81,900	£124,600	£94,465	£166,248	£177,100
Discounted Home Ownership (25%)	£101,250	£65,250	£87,750	£133,500	£101,213	£178,123	£189,750
Discounted Home Ownership (20%)	£108,000	£69,600	£93,600	£142,400	£107,960	£189,998	£202,400
Tenure option	Income (2020) by sub-area						
	Preston City	Central	East	North	West	Rural East	Rural North
Social Rent (average)	£16,162	£16,162	£16,162	£16,162	£16,162	£16,162	£16,162
Affordable Rent (monthly cost)	£22,810	£22,118	£22,118	£25,958	£21,120	£26,611	£32,602
Market Rent - Lower Quartile	£23,712	£22,896	£23,100	£26,400	£23,712	£26,400	£38,064
Market Rent - Median	£28,512	£27,648	£27,648	£32,448	£26,400	£33,264	£40,752
Market Rent - Average	£35,710	£37,066	£28,561	£34,438	£29,741	£36,182	£45,138
Market Sale - Lower Quartile	£23,400	£17,486	£24,236	£37,286	£25,714	£47,957	£53,486
Market Sale - Median	£34,714	£22,371	£30,086	£45,771	£34,701	£61,071	£65,057
Market Sale - Average	£46,682	£35,305	£30,706	£53,184	£42,343	£76,133	£82,242
Shared ownership (50%)	£26,222	£17,411	£22,918	£34,116	£26,213	£45,566	£48,460
Shared ownership (25%)	£21,738	£14,521	£19,032	£28,204	£21,731	£37,677	£40,056
Help to buy	£27,000	£17,400	£23,400	£35,600	£26,990	£47,500	£50,600
Discounted Home Ownership (30%)	£25,650	£16,530	£22,230	£33,820	£25,641	£45,125	£48,070
Discounted Home Ownership (25%)	£27,482	£17,711	£23,818	£36,236	£27,472	£48,348	£51,504
Discounted Home Ownership (20%)	£29,314	£18,891	£25,406	£38,651	£29,303	£51,571	£54,937

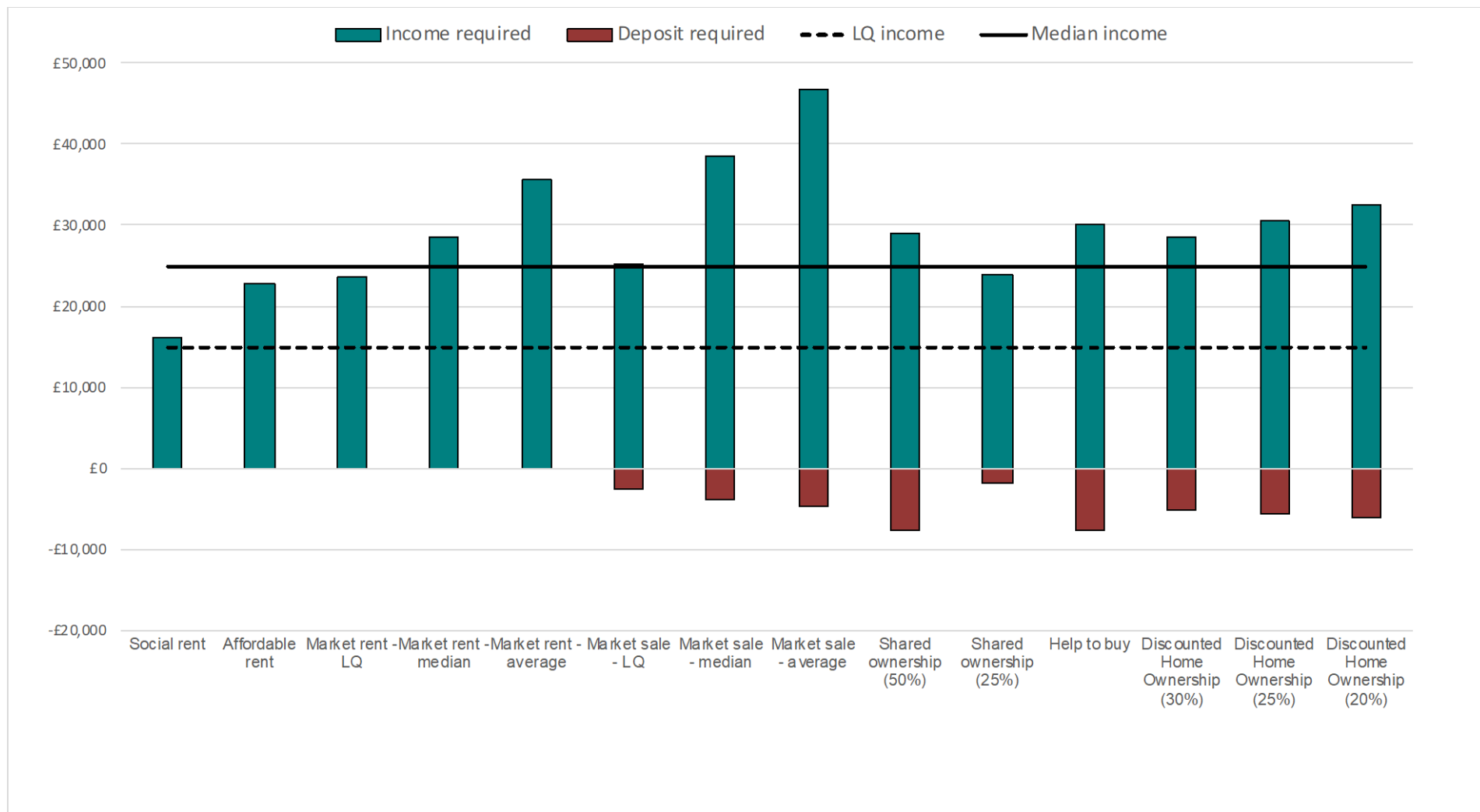
Source: Data produced by Land Registry © Crown copyright 2020, Zoopla PPD 2020, DLUHC, RSH SDR 2020

Table 3.10 Impact of alternative deposits on sale price and income required for open market properties

Market sale price	Deposit 10%	Deposit 20%	Deposit 30%	Deposit 40%	City Average Price
Market sale - lower quartile	£88,200	£78,400	£68,600	£58,800	£98,000
Market sale - median	£135,000	£120,000	£105,000	£90,000	£150,000
Market sale - average	£163,386	£145,232	£127,078	£108,924	£181,540
Household income required (3.5x multiple)	Deposit 10%	Deposit 20%	Deposit 30%	Deposit 40%	-
Market sale - lower quartile	£25,200	£22,400	£19,600	£16,800	-
Market sale - median	£38,571	£34,286	£30,000	£25,714	-
Market sale - average	£46,682	£41,495	£36,308	£31,121	-
Household income required (5x multiple)	Deposit 10%	Deposit 20%	Deposit 30%	Deposit 40%	-
Market sale - lower quartile	£17,640	£15,680	£13,720	£11,760	-
Market sale - median	£27,000	£24,000	£21,000	£18,000	-
Market sale - average	£32,677	£29,046	£25,416	£21,785	-

- 3.15 Figure 3.2 summarises in graphical form the relative affordability of alternative tenures at the city level, setting out the incomes and deposits required for different options set against prevailing lower quartile and median earnings derived from 2021 CAMEO data.
- 3.16 This indicates that households on lower quartile incomes can afford social, affordable and private lower quartile rents. For households on median incomes, lower renting is affordable along with some affordable home ownership options and lower quartile open market prices.

Figure 3.2 City of Preston household income and housing costs



Source: Data produced by Land Registry © Crown copyright 2020, RSH SDR 2020, Zoopla PPD 2020

What is genuinely affordable housing in the City of Preston context?

- 3.17 Having considered what a household needs to earn to afford alternative tenures, consideration is now given to the actual incomes of households across the city and how this relates to prevailing prices. This analysis helps to establish what is genuinely affordable based on reasonable income multipliers for renting and buying. The analysis takes into account:
- lower quartile and median household incomes from the 2020 CAMEO data;
 - 2020 entry-level incomes from a range of key worker occupations;
 - incomes associated with 2020 minimum and living wages (using single, dual income and 1.5x income measures);
 - the proportion of income a household would need to spend on rent;
 - the extent to which affordable rental options are genuinely affordable to households; and
 - the extent to which households could afford home ownership based on multiples of household income, with up to 3.5x being affordable.

Genuinely affordable rents

- 3.18 Table 3.11 focuses on the affordability of market renting and shows the cost of renting a lower quartile and median priced property by sub-area, ward and rural parish and city; how this compares with incomes; and what would be genuinely affordable based on local incomes. For example, lower quartile rents are £494 across the City of Preston where the lower quartile income is £1,250. This means that a household is spending 39.5% of income on rent. To be genuinely affordable, that is, costing no more than 25% of gross income, a lower quartile rent should be £313 each month and median rent should be £521 each month. However, there are affordability issues in the urban areas of Preston in particular.
- 3.19 Table 3.12 focuses on the affordability of home ownership and shows the cost of buying a lower quartile and median-priced property. This shows that prices are in excess of 3.5x household incomes across all areas and city-wide a property should cost no more than £52,500 to be affordable to households on lower quartile incomes and £87,500 to households on median incomes.

Table 3.11 Affordability of private rents by sub-area, ward and rural parish

Geography		LQ Rent and Income				Median rent and income			
		Actual LQ rent 2020	LQ Gross household income 2021 (Monthly £)	% LQ income required to be spent on LQ rent	What would be an affordable rent based on actual LQ income	Actual Median rent 2020	Median Gross household income 2021 (Monthly £)	% median income required to be spent on median rent	What would be an affordable rent based on actual median income
District	Preston	£494	£1,250	39.5	£313	£594	£2,083	28.5	£521
Ward sub-areas	Central	£477	£417	114.5	£104	£576	£1,250	46.1	£313
	East	£481	£1,250	38.5	£313	£576	£1,250	46.1	£313
	North	£550	£2,083	26.4	£521	£676	£2,917	23.2	£729
	West	£494	£1,250	39.5	£313	£550	£2,083	26.4	£521
	Ashton	£494	£2,083	23.7	£521	£550	£2,083	26.4	£521
Wards	Brookfield	£550	£1,250	44.0	£313	£594	£1,250	47.5	£313
	Cadley	£494	£1,250	39.5	£313	£594	£2,083	28.5	£521
	City Centre	£498	£417	119.5	£104	£598	£1,250	47.8	£313
	Deepdale	£451	£1,250	36.1	£313	£589	£1,250	47.1	£313
	Fishwick & Frenchwood	£425	£1,250	34.0	£313	£494	£1,250	39.5	£313
	Garrison	£576	£2,083	27.6	£521	£693	£2,917	23.8	£729
	Greyfriars	£598	£2,917	20.5	£729	£737	£2,917	25.3	£729
	Ingol & Cottam	£454	£1,250	36.3	£313	£598	£2,083	28.7	£521
	Lea & Larches	£524	£1,250	41.9	£313	£598	£1,250	47.8	£313
	Plungington	£494	£417	118.6	£104	£594	£1,250	47.5	£313
	Ribbleton	£446	£1,250	35.7	£313	£537	£1,250	43.0	£313
	Sharoe Green	£550	£2,083	26.4	£521	£693	£2,917	23.8	£729
	St Matthew's	£459	£417	110.2	£104	£498	£1,250	39.8	£313
Parish sub-areas	Rural East	£550	£2,917	18.9	£729	£693	£3,750	18.5	£938
	Rural North	£793	£3,750	21.1	£938	£849	£3,750	22.6	£938
Parishes	Barton	£793	£3,542	22.4	£885	£1,001	£3,750	26.7	£938
	Broughton	£722	£2,083	34.6	£521	£875	£3,750	23.3	£938
	Grimsargh	£536	£2,917	18.4	£729	£624	£3,750	16.6	£938
	Goosnargh	#	£2,917	#	£729	£748	£3,750	19.9	£938
	Haighton	#	£2,917	#	£729	#	£3,750	#	£938
	Whittingham	£537	£2,917	18.4	£729	£624	£3,750	16.6	£938
	Woodplumpton	£793	£3,750	21.1	£938	£849	£3,750	22.6	£938

Key

Up to and including 25%	24
Between 25% and 35%	32
35% or more	40

Sources: Zoopla PPD 2020, household income from 2021 CAMEO. Note in some areas rents exceed lower quartile incomes which reflects the level of deprivation across several inner areas of Preston # = no data

Table 3.12 Affordability of owner occupation by sub-area and rural parish

Geography		Actual LQ price 2020	LQ Gross household income 2021 (Annual £)	Income multiple required (assumes 10% deposit)	What would be an affordable property based on a 3.5x income multiple	Actual median price 2020	Median Gross household income 2021 (Annual £)	Income multiple required (assumes 10% deposit)	What would be an affordable property based on a 3.5x income multiple
District	Preston	£91,000	£15,000	5.5	£52,500	£135,000	£25,000	4.9	£87,500
Ward sub-areas	Central	£68,000	£5,000	12.2	£17,500	£87,000	£15,000	5.2	£52,500
	East	£94,250	£15,000	5.7	£52,500	£117,000	£15,000	7.0	£52,500
	North	£145,000	£25,000	5.2	£87,500	£178,000	£35,000	4.6	£122,500
	West	£100,000	£15,000	6.0	£52,500	£134,950	£25,000	4.9	£87,500
Wards	Ashton	£96,000	£25,000	3.5	£87,500	£133,250	£25,000	4.8	£87,500
	Brookfield	£100,000	£15,000	6.0	£52,500	£122,000	£15,000	7.3	£52,500
	Cadley	£109,963	£15,000	6.6	£52,500	£148,750	£25,000	5.4	£87,500
	City Centre	£75,000	£5,000	13.5	£17,500	£108,500	£15,000	6.5	£52,500
	Deepdale	£73,375	£15,000	4.4	£52,500	£88,000	£15,000	5.3	£52,500
	Fishwick & Frenchwood	£55,000	£15,000	3.3	£52,500	£75,500	£15,000	4.5	£52,500
	Garrison	£155,000	£25,000	5.6	£87,500	£201,000	£35,000	5.2	£122,500
	Greyfriars	£160,000	£35,000	4.1	£122,500	£188,249	£35,000	4.8	£122,500
	Ingol & Cottam	£116,950	£15,000	7.0	£52,500	£187,000	£25,000	6.7	£87,500
	Lea & Larches	£98,000	£15,000	5.9	£52,500	£125,000	£15,000	7.5	£52,500
	Plungington	£80,000	£5,000	14.4	£17,500	£97,500	£15,000	5.9	£52,500
	Ribbleton	£85,625	£15,000	5.1	£52,500	£109,500	£15,000	6.6	£52,500
	Sharoe Green	£145,000	£25,000	5.2	£87,500	£183,750	£35,000	4.7	£122,500
St Matthew's	£52,500	£5,000	9.5	£17,500	£68,500	£15,000	4.1	£52,500	
Parish sub-areas	Rural East	£186,500	£35,000	4.8	£122,500	£237,498	£45,000	4.7	£157,500
	Rural North	£208,000	£45,000	4.2	£157,500	£253,000	£45,000	5.1	£157,500
Parishes	Barton	£187,000	£42,500	4.0	£148,750	£264,950	£45,000	5.3	£157,500
	Broughton	£216,249	£25,000	7.8	£87,500	£260,000	£45,000	5.2	£157,500
	Grimstargh	£177,000	£35,000	4.6	£122,500	£225,000	£45,000	4.5	£157,500
	Goosnargh	£425,000	£35,000	10.9	£122,500	£490,000	£45,000	9.8	£157,500
	Haighton	£603,000	£35,000	15.5	£122,500	£603,500	£45,000	12.1	£157,500
	Whittingham	£180,000	£35,000	4.6	£122,500	£250,000	£45,000	5.0	£157,500
	Woodplumpton	£205,000	£45,000	4.1	£157,500	£249,950	£45,000	5.0	£157,500

Key:

Up to 3.5x	2.9
Between 3.5x and 5x	4.2
5x or more	6.5

Sources: Land Registry © Crown copyright 2020, household income from 2021 CAMEO

Affordability of prices and rents to selected key workers and households on minimum/living wages

- 3.20 The extent to which city-wide open market rents are affordable to selected keyworkers and households on minimum and living wages are explored in Table 3.13. Key workers on entry-level grades are generally having to spend more than 25% of their income on rent although for several occupations and grades properties are affordable.
- 3.21 Table 3.14 considers the income multiples needed to buy a property based on the incomes of selected key workers and households on minimum/living wages. Analysis assumed that a 10% deposit was available and indicates that multiples in excess of 3.5x were generally needed when buying a property. Prices that are genuinely affordable were also considered based on a 3.5x income multiple.

Table 3.13 Incomes of key workers and households on minimum/living wage and rental affordability

Income/Occupation/ Wage	Gross household income 2021 (Annual £)	Gross household income 2021 (Monthly £)	% LQ Income for LQ rent	% Median income for median rent	LQ Rent	Median Rent
Police officer	-	-	-	-	-	-
Pay Point 0	£21,402	£1,784	27.7	33.3	£494	£594
Pay Point 2	£25,902	£2,159	22.9	27.5	£494	£594
Pay Point 4	£28,158	£2,347	21.1	25.3	£494	£594
Nurse	-	-	-	-	-	-
Band 1	£18,546	£1,546	32.0	38.4	£494	£594
Band 3	£20,330	£1,694	29.2	35.1	£494	£594
Band 5	£25,655	£2,138	23.1	27.8	£494	£594
Fire officer	-	-	-	-	-	-
Trainee	£24,191	£2,016	24.5	29.5	£494	£594
Competent	£32,244	£2,687	18.4	22.1	£494	£594
Teacher	-	-	-	-	-	-
Unqualified (min)	£18,169	£1,514	32.6	39.2	£494	£594
Main pay range (min)	£25,714	£2,143	23.1	27.7	£494	£594
Minimum/Living Wage	-	-	-	-	-	-
Age 23 and over	-	-	-	-	-	-
Single household	£16,038	£1,337	37.0	44.4	£494	£594
1xFull-time, 1xPart-time	£24,057	£2,005	24.6	29.6	£494	£594
Two working adults	£32,076	£2,673	18.5	22.2	£494	£594
Age 21 and 22	-	-	-	-	-	-
Single household	£15,048	£1,254	39.4	47.4	£494	£594
1xFull-time, 1xPart-time	£22,572	£1,881	26.3	31.6	£494	£594
Two working adults	£30,096	£2,508	19.7	23.7	£494	£594

Key

	More than 35% of income spent on rent
	Between 25% and 35% of income spent on rent
	Less than 25% of income spent on rent

Table 3.14 Incomes of households, selected key workers and households on minimum/living wage and open market prices

Income/Occupation/Wage		Gross household income 2021 (Annual £)	Gross household income 2021 (Monthly £)	LQ Rent	Median Rent	LQ Rent	Median Rent
				% income needed	% income needed		
CAMEO UK Household Income	LQ income	£15,000	£1,250	39.5	47.5	£494	£594
	Median income	£25,000	£2,083	23.7	28.5	£494	£594
	Average income	£26,796	£2,233	22.1	26.6	£494	£594
ONS Annual Survey of Hours and	ASHE LQ	£21,488	£1,791	27.6	33.2	£494	£594
	ASHE Median	£26,918	£2,243	22.0	26.5	£494	£594
	ASHE Average	£32,451	£2,704	18.3	22.0	£494	£594
Police officer							
	Pay Point 0	£21,402	£1,784	27.7	33.3	£494	£594
	Pay Point 2	£25,902	£2,159	22.9	27.5	£494	£594
	Pay Point 4	£28,158	£2,347	21.1	25.3	£494	£594
Nurse							
	Band 1	£18,546	£1,546	32.0	38.4	£494	£594
	Band 3	£20,330	£1,694	29.2	35.1	£494	£594
	Band 5	£25,655	£2,138	23.1	27.8	£494	£594
Fire officer							
	Trainee	£24,191	£2,016	24.5	29.5	£494	£594
	Competent	£32,244	£2,687	18.4	22.1	£494	£594
Teacher							
	Unqualified (min)	£18,169	£1,514	32.6	39.2	£494	£594
	Main pay range (min)	£25,714	£2,143	23.1	27.7	£494	£594
Minimum/Living Wage							
	Single household (23 and over)	£16,038	£1,337	37.0	44.4	£494	£594
	1xFull-time, 1xPart-time	£24,057	£2,005	24.6	29.6	£494	£594
	Two working adults	£32,076	£2,673	18.5	22.2	£494	£594
	Single household (21-22)	£15,048	£1,254	39.4	47.4	£494	£594
	1xFull-time, 1xPart-time	£22,572	£1,881	26.3	31.6	£494	£594
	Two working adults	£30,096	£2,508	19.7	23.7	£494	£594

Key

	More than 4.5x income multiple required
	Between 3.5x and 4.5x income multiple required
	Less than 3.5x income multiple required

Concluding comments

- 3.22 In 2020, lower quartile house prices were £98,000 and median prices were £150,000 across the City of Preston. These prices are lower than elsewhere in Central Lancashire, the North West and England. Lower quartile private rents in 2020 were £494 and median rents were £524.
- 3.23 The relative affordability of dwellings to buy or rent was explored at sub-area, ward and rural parish level. This calculation assumed that a rent is affordable if no more than 25% of household income is spent on rent and if buying a property should cost no more than 3.5x household income.
- 3.24 Across the City of Preston, the minimum income required for entry-level/lower quartile renting was £25,200. Overall, households had to spend 39.5% of lower quartile income on a lower quartile rent and 28.5% of median income for median rents. There were notable affordability pressures in the urban areas of Preston, with rents exceeding 40% of income. The overall affordability picture is mixed, but the greatest affordability pressures are in urban areas, with properties least affordable in the Central sub-area based on local prices and incomes. Properties were most affordable in Rural East and Rural North, bearing in mind this analysis is based on local incomes which tend to be higher in the rural areas, but there are still substantial affordable needs in these areas.
- 3.25 For buying an entry-level/lower quartile property, the minimum income required was £38,571. The ratio of lower quartile income to price across the City of Preston was 5.4x and for median income to median price it was 5.9x. Both ratios are above the benchmark of 3.5x income and ratio. Ratios are much higher in some urban and rural areas and without substantial deposits the ability to buy is a challenge to many households. Based on lower quartile local incomes and house prices, the most affordable sub-area for buying was the North, Rural East and Rural North; the Central sub-area was the least affordable.
- 3.26 Specific analysis of the affordability of renting and buying for key worker incomes and those on minimum/living wages was carried out. Key workers on entry-level grades are generally having to spend more than 25% of their income on rent although for several occupations and grades properties are affordable.
- 3.27 Private renting was generally affordable to households who had multiple earners on minimum/living wage. However, single earners on minimum/living wage had to spend upwards of 35% of income on lower quartile rents.
- 3.28 For buying, analysis assumed that a 10% deposit was available but indicated that income multiples in excess of 3.5x were needed to buy on the open market.
- 3.29 Using the evidence presented in this chapter, it is possible to establish what would be a genuinely affordable rent and purchase price across the City of Preston (Table 3.15). This is based on local incomes and assumes that no more than 25% of income is spent on rent and a household income multiple of 3.5x is applied to local household incomes when testing the affordability of buying. This provides a clear, evidence-based appreciation of entry-level rental and buying prices that could be afforded by households based on local household incomes.

Table 3.15 Genuinely affordable rents and purchase prices by sub-area, ward and parish

District	LQ rents (25% of income)	Median rents (25% of income)	LQ purchase (3.5x income multiple)	Median purchase (3.5x income multiple)
Preston	£313	£594	£52,500	£87,500
Ward sub-areas	LQ rents (25% of income)	Median rents (25% of income)	LQ purchase (3.5x income multiple)	Median purchase (3.5x income multiple)
Central	£104	£576	£17,500	£52,500
East	£313	£576	£52,500	£52,500
North	£521	£676	£87,500	£122,500
West	£313	£550	£52,500	£87,500
Wards	LQ rents (25% of income)	Median rents (25% of income)	LQ purchase (3.5x income multiple)	Median purchase (3.5x income multiple)
Ashton	£521	£550	£87,500	£87,500
Brookfield	£313	£594	£52,500	£52,500
Cadley	£313	£594	£52,500	£87,500
City Centre	£104	£598	£17,500	£52,500
Deepdale	£313	£589	£52,500	£52,500
Fishwick & Frenchwood	£313	£494	£52,500	£52,500
Garrison	£521	£693	£87,500	£122,500
Greyfriars	£729	£737	£122,500	£122,500
Ingol & Cottam	£313	£598	£52,500	£87,500
Lea & Larches	£313	£598	£52,500	£52,500
Plungington	£104	£594	£17,500	£52,500
Ribbleton	£313	£537	£52,500	£52,500
Sharoe Green	£521	£693	£87,500	£122,500
St Matthew's	£104	£498	£17,500	£52,500
Parish sub-areas	LQ rents (25% of income)	Median rents (25% of income)	LQ purchase (3.5x income multiple)	Median purchase (3.5x income multiple)
Rural East	£729	£693	£122,500	£157,500
Rural North	£938	£849	£157,500	£157,500
Parishes	LQ rents (25% of income)	Median rents (25% of income)	LQ purchase (3.5x income multiple)	Median purchase (3.5x income multiple)
Barton	£885	£1,001	£148,750	£157,500
Broughton	£521	£875	£87,500	£157,500
Grimsargh	£729	£624	£122,500	£157,500
Goosnargh	£729	£748	£122,500	£157,500
Haighton	£729	Too few sales	£122,500	£157,500
Whittingham	£729	£624	£122,500	£157,500
Woodplumpton	£938	£849	£157,500	£157,500

Sources: Household income from 2021 CAMEO

4. The needs of different groups

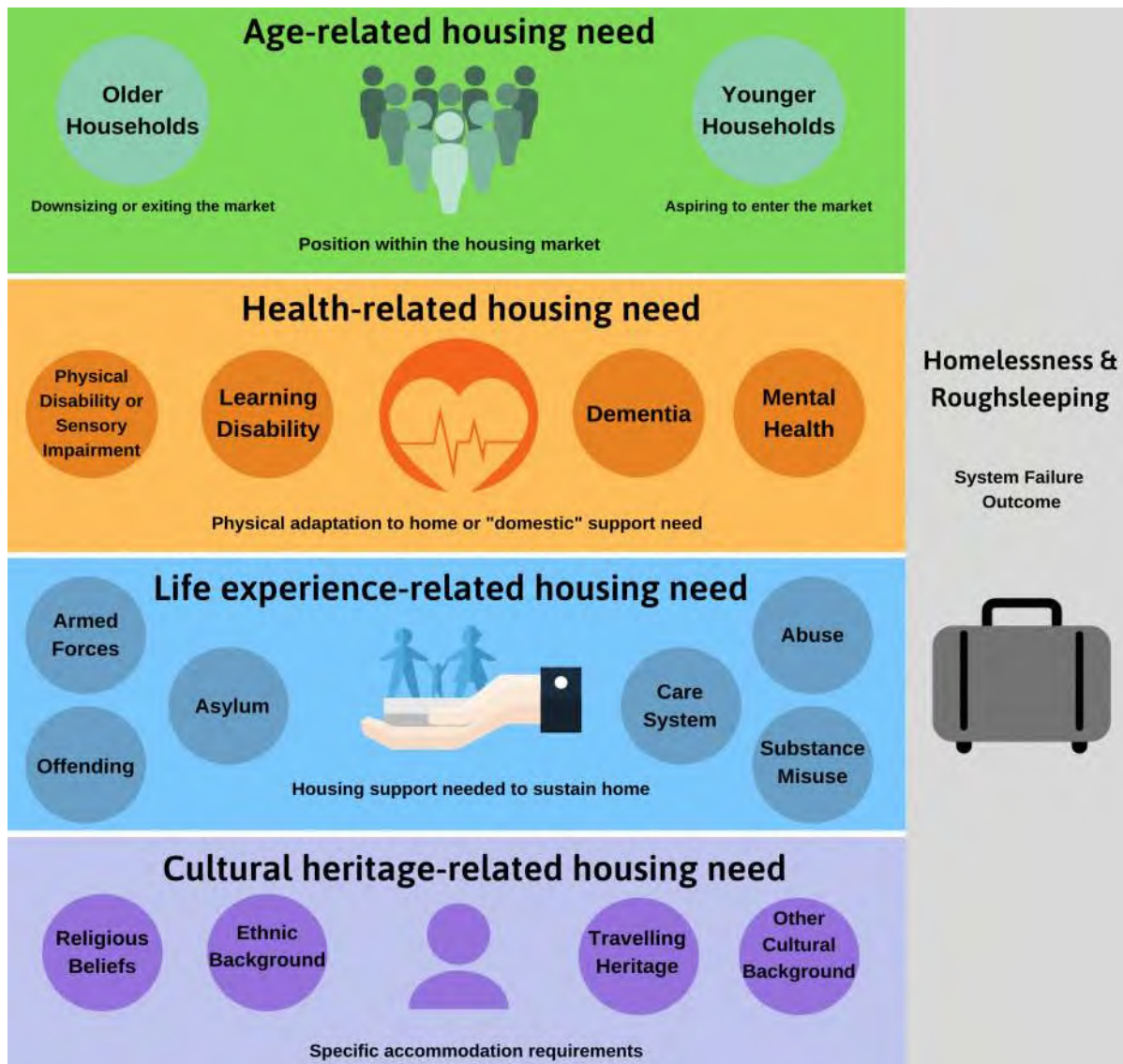
Introduction

4.1 Paragraph 62 of the NPPF refers to housing needs for different groups in the community and these fall into two broad groups: housing for people with additional needs and housing for specific household types.

Housing for people with additional needs

4.2 These groups include older people and accommodation for people with disabilities which are further sub-divided into those with health-related and life-experience related needs as summarised in Figure 4.1.

Figure 4.1 Establishing need associated with age, health and life experience



- 4.3 The evidence base relating to additional needs groups has been established based around these broad principles:
- people with additional needs are generally accommodated in mainstream housing and provided with care and support when needed;
 - some people will have complex and multiple needs and therefore may fall into several different categories of need;
 - some people require long-term accommodation to provide support for ongoing needs; and some require short-term supported housing which aims to support people for a period of time before moving on/back into mainstream housing; and
 - most people with additional needs will not need specialist supported housing but they may need adaptations to their homes and/or care and support provided in other ways.
- 4.4 The Lancashire County Council Market Position Statement 2019 for adult social care provides a wealth of information on the needs of different groups and relevant information is presented in this chapter ([click here for link to Position Statement](#)).
- 4.5 Some of the material in the MPS relates to multiple groups:
- Lancashire County Council funds 1,091 daytime support places each week for people with learning disabilities, mental health and physical disabilities. This is expected to grow to 1,680 by 2021/22.
 - Providers should develop daytime support which offers innovative and creative support including employment support.
 - The development of newer, more innovative and flexible Supported Living accommodation for people with a learning or physical disability, and/or mental health condition.
 - Current funding of around 5,700 individuals in long-term residential and nursing care supporting older people, people with mental health needs and people with a learning or physical disability, or sensory impairment.
 - A residential and nursing care strategy is to be developed.
 - The County Council are the largest provider of residential care with 717 residential care places across 17 homes.

Age-related housing need

- 4.6 Age-related housing need relates to the needs of specific age groups in the housing market due to life events and the impact this has on the need for dwellings of particular sizes/types and affordability. For older households this includes 'rightsizing' and adaptation of existing dwellings. For younger households, affordability is a particular concern and this has been considered elsewhere in the report. For this section we therefore focus upon the needs of older persons for particular unit types.

Housing for older people

- 4.7 The NPPF Annex 2 defines older people as **‘people over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing can encompass accessible, adaptable general needs housing through to the full range of retirement and specialist housing for those with care and support needs.’**
- 4.8 PPG recommends the following are considered in an assessment of older persons need:
- The future need for specialist accommodation (including but not restricted to age-restricted general market housing, retirement living or sheltered accommodation, Extra Care or housing with care), broken down by type and tenure.
 - The need for care in residential care and nursing homes (C2).
 - The need for co-housing communities.
 - The role of general housing and in particular bungalows and homes that can be adapted to meet a change in needs.
- 4.9 PPG notes that **‘plan-making authorities will need to count housing provided for older people against their housing requirement’** (source: PPG June 2019 Paragraph: 016 Reference ID: 63-016-20190626).
- 4.10 Over the period 2021 to 2038, the number of people aged 65 and over is expected to increase by 28.2% and by 2038 there will be an additional 5,967 residents aged 65 and over. The number of households headed by someone aged 65 or over is expected to increase by 4,109 (29.2%) by 2038.
- 4.11 The 2021 household survey indicates that 46.7% of older people want to remain in their current home with help and support when needed (Table 4.1). There is also interest in a range of options including open market, rented from a housing association/council, sheltered and co-housing.

Table 4.1 Older persons' housing preferences by age group

Housing option	65-74 (%)	75-84 (%)	85+ (%)	All 65+ (%)
Continue to live in current home with support when needed	50.5%	78.8%	58.9%	46.7%
Buying a dwelling on the open market	30.5%	11.8%	0.0%	25.4%
Rent a dwelling from a private landlord	2.3%	2.9%	0.0%	6.3%
Rent from housing association	10.2%	4.3%	0.0%	17.7%
Rent from the council	10.2%	5.6%	0.0%	16.1%
Sheltered accommodation - To rent	7.2%	6.5%	1.0%	10.8%
Sheltered accommodation - To buy	5.9%	13.6%	1.0%	5.7%
Sheltered accommodation - Part rent/buy (shared ownership)	4.0%	8.4%	49.3%	4.6%
Extra Care housing - To rent	6.0%	2.5%	4.8%	7.1%
Extra Care housing - To buy	1.5%	2.9%	1.0%	3.7%
Extra Care housing - Part rent/buy (shared ownership)	2.4%	0.4%	33.5%	4.0%
Supported housing for people with learning disabilities and autism	0.0%	0.0%	1.0%	0.9%
Supported housing for mental health conditions	0.3%	2.0%	0.0%	2.3%
Residential nursing/care home	4.9%	20.3%	18.9%	5.9%
Co-housing - your own home in a small community which shares facilities (e.g. laundry) and activities	12.4%	0.9%	0.0%	9.2%
Go to live with children or other relatives/friends	2.1%	5.3%	33.5%	7.5%
Other	3.2%	2.8%	6.5%	6.0%
<i>Base (total households responding)</i>	5,188	1,599	672	7,459

Source: 2021 household survey

4.12 The 2021 household survey indicates 47% of older people planning to move would like to move to a property with fewer bedrooms, 41.5% would like to move to a property with the same number of bedrooms and 11.5% would like a larger property (Table 4.2). The general conclusion is that smaller dwellings are needed to accommodate older movers but there are households who would require the same or even an increase in the number of bedrooms in their properties.

Table 4.2 Future housing choices of older households (rightsizing)

Housing choice	Aspiration (%)	Expectation (%)
Downsizing (moving to a smaller property)	47.0%	46.3%
Staying same	41.5%	49.9%
Upsizing (moving to larger property)	11.5%	3.8%
Total	100.0%	100.0%
Base (households responding)	2,947	2,846

Source: 2021 household survey

Future need for specialist older person accommodation and residential care provision

- 4.13 Across the City of Preston there are around 5,474 units of specialist older persons accommodation comprising 3,078 specialist older accommodation (C3 planning use class) and 2,396 units of residential care (C2 use class). Map 4.1 and Table 4.3 shows the current number of older persons units of accommodation across the city using data provided by the Elderly Accommodation Counsel.

Table 4.3 Categories of older person accommodation

Category (and planning use category)	Current number of units	Description
Age-exclusive housing (C3)	641	<p>EAC definition: Schemes or developments that cater exclusively for older people, usually incorporate design features helpful to older people and may have communal facilities such as a residents' lounge, guest suite and shared garden, but do not provide any regular on-site support to residents.</p> <p>PPG definition: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.</p>
Care homes (C2)	1,143	<p>EAC definition: A residential setting where a number of older people live, usually in single rooms, and have access to on-site care services. Since April 2002 all homes in England, Scotland and Wales are known as 'care homes', but are registered to provide different levels of care. A home registered simply as a care home will provide personal care only - help with washing, dressing and giving medication.</p> <p>PPG definition: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.</p>
Care home with nursing (C2)	1,253	A home registered as a care home with nursing will provide the same personal care but also have a qualified nurse on duty twenty-four hours a day to carry out nursing tasks. These homes are for people who are physically or mentally frail or people who need regular attention from a nurse.
Enhanced sheltered/close case (C3)	82	Sheltered housing that provides more in facilities and services than traditional sheltered housing but does not offer the full range of provision that is found in an Extra Care housing scheme

Category (and planning use category)	Current number of units	Description
Retirement/Sheltered housing (C3)	2,243 R	<p>EAC definition: Sheltered housing (S) means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. Retirement housing (R) means housing developments of a similar type to sheltered housing, but built for sale, usually on a leasehold basis. The term sheltered housing is now largely superseded by retirement housing.</p> <p>PPG definition: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.</p>
Extra Care housing or housing with care (C3)	112	<p>EAC definition: Extra Care Housing is housing designed with the needs of frailer older people in mind and with varying levels of care and support available on site. People who live in Extra Care Housing have their own self-contained homes, their own front doors and a legal right to occupy the property. Extra Care Housing is also known as very sheltered housing, assisted living, or simply as 'housing with care'. It comes in many built forms, including blocks of flats, bungalow estates and retirement villages. It is a popular choice among older people because it can sometimes provide an alternative to a care home.</p> <p>PPG definition: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.</p> <p>Note Extra Care can also provide accommodation for people with additional needs who are not older people</p>
Total	5,474	

Source: EAC data 2021

- 4.14 Given the ageing of the population, the need for specialist older person accommodation is expected to increase. Based on population projections there is a need for 1,903 additional units of specialist older persons' accommodation by 2038 (Table 4.4).
- 4.15 The Lancashire Market Position Statement includes the following housing priorities:
- Less reliance on residential care and more Extra Care schemes.
 - Daytime support for 'younger' older people to engage people with their communities to reduce social isolation.
 - A need for more Elderly Mentally Infirm (EMI) and Elderly Mental Dementia (EMD) for older people.
 - Technology-enabled care to maximise independence, reduce reliance on formal supports and improve outcomes for people.
- 4.16 The total additional need for specialist older person (C3) dwellings is projected to be 1,070 by 2038 (59 each year). C3 housing is part of the overall annual housing need to be delivered across the city. There is an additional need for 833 residential care units (46 each year).

Table 4.4 Analysis of future need for specialist older person accommodation 2021-2038

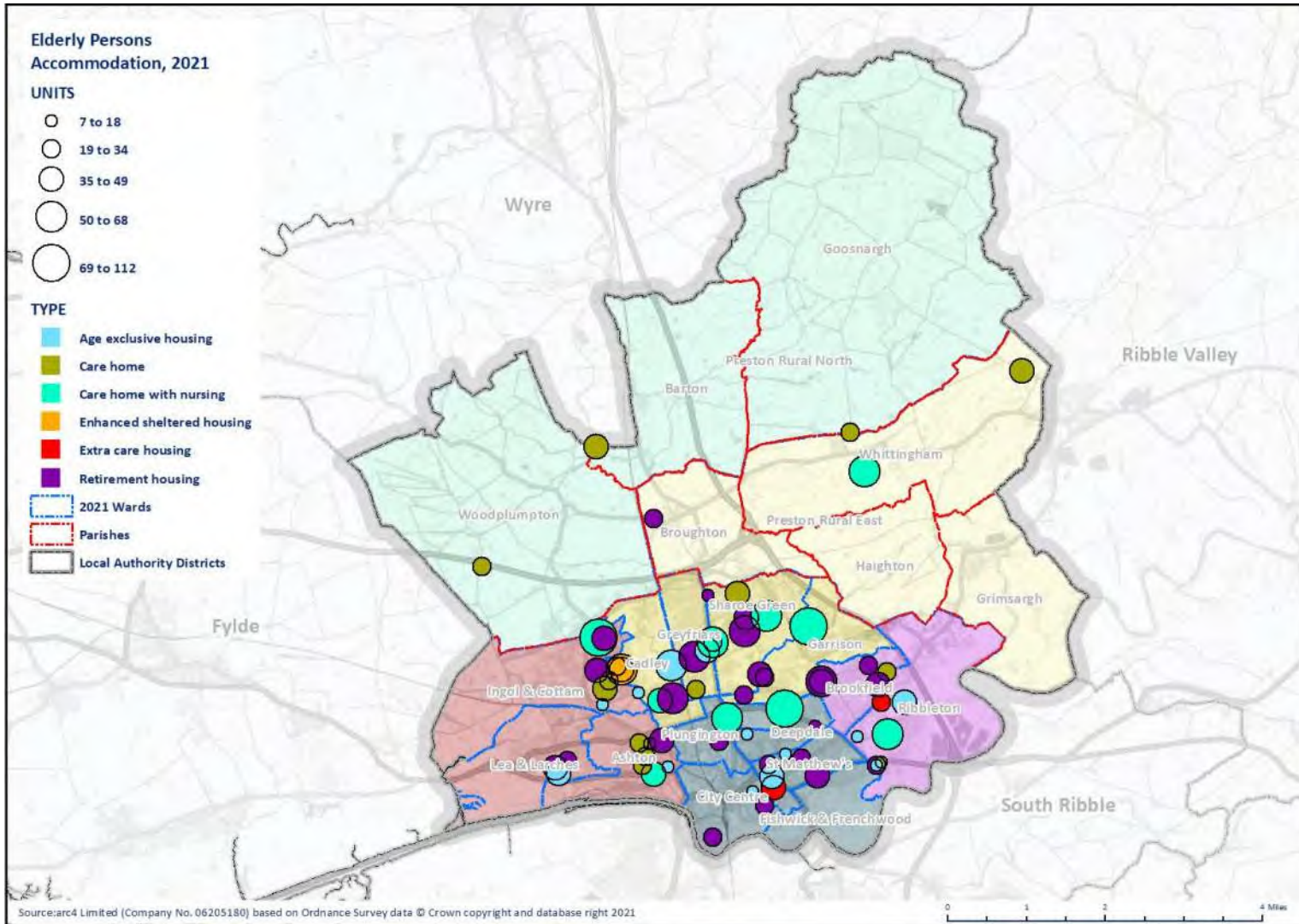
Current provision (and planning use class)	Number of units 2021	Number aged 75 and over 2021	Number aged 75 and over 2038 (projected)	Change in need
-	-	9,582	12,913	-
Current provision (and planning use class)	Number of units 2021	Ratio of population to current provision	Ratio of population applied to 2038 population	Change in need
Specialist older person (C3)	3,078	0.32123	4,148	1,070
Residential Care (C2)	2,396	0.25005	3,229	833
Total	5,474	-	7,377	1,903

Source: EAC data, 2018-based population projections

Senior cohousing communities

- 4.17 Senior cohousing is specifically mentioned in PPG as a housing option for older people: 'Senior co-housing communities are created and run by residents, based on the intention to live with a group of people of a similar age. The sites often consist of self-contained private homes as well as shared community space. Some communities offer an additional option for informal care.'
- 4.18 This option should be considered by the council as part of a diverse range of accommodation for older people. The household survey identified a total of 1,686 households interested in co-housing, with a particular interest in 1 and 2-bedroom dwellings and a range of dwelling types including houses, flats and bungalows.

Map 4.1 Current older persons accommodation across the City of Preston



Source: Elderly Accommodation Counsel 2021

People with dementia and early onset dementia

- 4.19 The PPG makes specific reference to dementia and that **‘there should be a range of housing options and tenures available to people with dementia, including mainstream and specialist housing. Innovative and diverse housing models should be considered where appropriate’** (source: June 2019 PPG Paragraph: 019 Reference ID: 63-019-20190626).
- 4.20 The PPG also outlines the characteristics of dementia- friendly communities:
- easy to navigate physical environment;
 - appropriate transport;
 - communities shaped around the views of people with dementia and their carers;
 - good orientation and familiarity;
 - reduction in unnecessary clutter; and
 - reduction in disorienting visual and auditory stimuli.
- 4.21 Lancashire County Council has a Dementia Friendly Strategy [click here for link to Dementia Friendly Strategy](#).
- 4.22 2020 POPPI/PANSI data estimates there are 35 people with early onset dementia and 1,445 people aged 65 and over with dementia (Table 4.5). By 2038, the number of people aged 65 and over with dementia is projected to increase by 32.4%, The number with early onset dementia is expected to reduce slightly.

Table 4.5 People with dementia

Dementia	2020	2038	% Change 2020-2038
Early onset dementia (30-64)	35	32	-8.0%
Dementia (65-74)	267	333	24.8%
Dementia (75-84)	567	769	35.7%
Dementia (85 and over)	611	810	32.6%
Dementia (total 65+)	1,445	1,913	32.4%

Source: POPPI/PANSI applied to 2018-based population projections

- 4.23 A report by the All Party Parliamentary Group (APPT) on Housing and Care for Older People published a report on Housing for People with Dementia in July 2021 [click here for report](#)
- 4.24 This set out 23 recommendations which included:
- Recognise potential future loneliness and how we can maintain our family connections and wider social networks in the communities we live in before or after diagnosis.
 - Consider whether to move whilst we are able: rightsizing and moving to the right place and environment whilst able to still develop new routes and make new friends.

- Make preventive changes, incrementally, to the home environment; such as when upgrading property or installing new technology, or where we require additional personal care and support to help us to live independently.
- 4.25 Regarding housing and planning, the report recommended:
- Support increased provision of Extra Care housing / assisted living accommodation and retirement housing that is dementia-ready, with top-sliced grant-aid through Homes England.
 - Strengthen DLUHC guidance to local planning authorities. LPAs should respond to demographic change and the need for more homes designed for older people, including those with dementia, through Local Plans specifying requirements for age-friendly housing.

The role of general housing and in particular bungalows and homes that can be adapted to meet a change in needs

- 4.26 The profile of dwellings occupied by households aged 65 and over by age group, based on the 2021 household survey, is summarised in Table 4.6. This shows that the majority (72.5%) live in houses, particularly with 3 or more bedrooms; 10.5% live in bungalows, 13.6% in flats and 3.3% in other dwelling types.

Table 4.6 Dwellings occupied by households where the HRP is aged 65 and over

Dwelling type and size	65 to 74 (%)	75 to 84 (%)	85+ (%)	Total (%)
1 or 2-bedroom house	11.8	6.3	18.3	11.0
3 bedroom house	37.9	40.3	25.0	37.5
4 or-more bedroom house	28.3	18.1	3.6	24.0
1-bedroom bungalow	3.3	0.6	0.6	2.4
2 or more-bedroom bungalow	6.9	10.8	10.8	8.1
1-bedroom flat	5.0	9.5	20.5	7.2
2 or more-bedroom flat	6.7	7.6	0.0	6.4
Other	0.1	6.8	21.1	3.3
Total	100.0	100.0	100.0	100.0
Base	9,893	3,426	1,099	14,418

Source: 2021 household survey

- 4.27 The provision of appropriate adaptations to existing dwelling stock can help people lead independent lives. PPG also asks councils to consider the extent to which existing dwelling stock can help meet the needs of older people (source: PPG 2019 Paragraph: 017 Reference ID: 2a-017-20190220).
- 4.28 Given that the majority of older people want to remain in their own homes with help and support when needed, the 2021 household survey provides a useful insight into the proportion of households who need care and support and the extent to which properties are adapted (Table 4.7).

- 4.29 Table 4.7 shows that 8.6% of all households require care and support to enable them to stay in their home. Of households with a household reference person aged 85 and over, 31.5% require help and support to enable them to stay in their own home. Table 4.8 presents this data at sub-area level.
- 4.30 61.7% of households have sufficient space for a carer to stay overnight if needed – but this reduces to 54% in the 85+ age group. Owner occupiers were most likely to have space available, but private and in particular social renters were less likely. Around 34% of respondents in affordable housing had sufficient space for a carer.
- 4.31 Around 7.8% of all dwellings had been adapted or purpose-built for a person with a long-term illness, health problem or disability. This was highest amongst affordable housing occupants (15.7%) and lowest amongst owner occupiers (5.8%). Older people were more likely to live in an adapted home, with 15.4% of households with a HRP aged 75-84 and 19.8% with a HRP aged 85+ living in adapted homes.
- 4.32 Around 14.2% of households need facilities on one floor (living room, kitchen, bathroom and bedroom) and this increases to 57.1% of households with a HRP aged 85+.

Table 4.7 Adaptations, support needs and space for carer by tenure and age group

	Is there sufficient space in your home for a carer to stay overnight, if this was needed?	Do you, or any other members of your household, require care or support to enable you/them to stay in this home?	Has your current home been adapted or purpose-built for a person with a long-term illness, health problem or disability?	Do you or someone in your household need all facilities on one floor (living room, bathroom, kitchen, bedroom)?
Tenure	YES (%)	YES (%)	YES (%)	YES (%)
Owner Occupied	71.1	6.6	5.8	9.7
Private Rented	56.6	6.7	6.0	16.2
Affordable	33.8	16.2	15.7	28.4
All tenures	61.7	8.6	7.8	14.2
	Is there sufficient space in your home for a carer to stay overnight, if this was needed?	Do you, or any other members of your household, require care or support to enable you/them to stay in this home?	Has your current home been adapted or purpose-built for a person with a long-term illness, health problem or disability?	Do you or someone in your household need all facilities on one floor (living room, bathroom, kitchen, bedroom)?
Age of household reference person	YES (%)	YES (%)	YES (%)	YES (%)
Under 65	56.8	8.0	6.9	11.8
65 to 74	79.2	9.3	7.6	17.5
75 to 84	74.7	6.6	15.4	21.2
85 and over	54.0	31.5	19.8	57.1
All age groups	61.7	8.6	7.8	14.2

Source: 2021 household survey

Table 4.8 Adaptations, support needs and space for carer by sub-area

	Is there sufficient space in your home for a carer to stay overnight, if this was needed?	Do you, or any other members of your household, require care or support to enable you/them to stay in this home?	Has your current home been adapted or purpose-built for a person with a long-term illness, health problem or disability?	Do you or someone in your household need all facilities on one floor (living room, bathroom, kitchen, bedroom)?
Tenure	YES (%)	YES (%)	YES (%)	YES (%)
Central	50.4%	10.2%	7.4%	17.9%
East	54.1%	9.0%	12.5%	11.1%
North	72.2%	11.2%	6.7%	12.9%
West	82.5%	3.6%	3.9%	6.4%
Preston Rural East	86.4%	3.5%	3.9%	3.5%
Preston Rural North	64.6%	5.6%	10.5%	14.0%
City of Preston Total	61.7%	8.6%	8.6%	14.2%

Source: 2021 household survey

Estimating future need for adaptations and home improvement

- 4.33 The 2021 household survey provides evidence of the range of adaptations and home improvements needs based on the age group of the household reference person (Table 4.9).
- 4.34 Better heating, more insulation and double glazing were most frequently mentioned improvements needed.
- 4.35 Regarding adaptations, these were mainly mentioned by older households and most frequently mentioned were bathroom adaptations, internal and external handrails/grabrails and kitchen adaptations. The need for adaptations was generally highest amongst the 75+ age group.
- 4.36 These requirements are self-determined by residents responding to the household survey and may not necessarily reflect actual requirements following an independent assessment in the home.
- 4.37 Whilst energy efficiency improvements to existing dwellings are undoubtedly beneficial to the individual, as improved thermal efficiency reduces fuel poverty as well as cold related accidents and ill health, there are also significant climate change benefits to be accrued. 25% of carbon emissions result from the domestic sector. The challenge in Preston is the scale of retrofit required within the existing stock, much of which is older and inherently inefficient, when relatively little funding is available to households to undertake the required works. Preston is currently part of the Lancashire collaborative partnership, Cosy Homes in Lancashire, which draws down bid funding from central Government to undertake energy efficiency improvements for low income households. However, these funds are short term in nature and inevitably fail to keep up with the scale of retrofit required.

Table 4.9 Adaptations and home improvements required by age group

Home improvement required	Under 65 (% of households)	65-74 (% of households)	75+ (% of households)	Total (% of households)
More insulation (loft, wall cavities)	20.1%	10.0%	9.3%	17.5%
Community alarm service	4.6%	5.0%	5.9%	4.8%
Better heating	20.1%	15.9%	9.4%	18.5%
Double glazing	18.0%	7.2%	9.7%	15.6%
Improved ventilation	11.8%	3.1%	5.2%	9.8%
Downstairs WC	9.7%	6.1%	9.0%	9.1%
Increase the size of property (e.g. extension, loft conversion)	14.0%	1.7%	2.5%	11.0%
Base (all households)	44,054	9,901	4,569	58,524
Adaptation required	Under 65 (% of households)	65-74 (% of households)	75+ (% of households)	Total (% of households)
Adaptations to bathroom	12.8%	20.5%	16.9%	14.4%
Adaptations to kitchen	7.0%	15.2%	19.4%	9.3%
External handrails /grab rails	12.4%	5.2%	9.0%	10.9%
Internal handrails /grab rails	5.0%	6.4%	13.5%	5.9%
Stair lift / vertical lift	4.7%	7.8%	12.3%	5.8%
Adaptations relating to sensory needs	4.0%	1.2%	8.9%	3.9%
Improvements to access (e.g. level access in and around home)	6.1%	4.5%	8.2%	6.0%
Wheelchair adaptations (including door widening and ramps)	3.8%	1.4%	10.0%	3.9%
Lever door handles	4.1%	4.9%	9.4%	4.6%
Room for a carer	4.4%	3.1%	1.6%	3.9%
Base (all households)	44,054	9,901	4,569	58,524

Source: 2021 household survey

- 4.38 There is a wealth of evidence to show the value gained from adapting people's existing accommodation. This could be expressed either in terms of improving outcomes for older people, the majority of whom wish to remain independent in their own homes, or the savings to be gained within the health economy by reduced dependence on expensive residential care or fewer accidents in the home setting.
- 4.39 One source of funding for adaption is the Disabled Facilities Grant which is a significant capital programme of work for the council. Each year between 150-200 properties in the existing stock in Preston are adapted, the vast majority delivering the adaptations listed in Table 4.9. Whilst the grants are 'means tested', the current levels of funding, plus the council's approved flexibility around the means test, mean that in practice very few applicants make any contribution at all. Whilst DFG's are reliant on central government grant allocation, there is no expectation that these funds will diminish in the foreseeable future.

- 4.40 Alternative sources of funding, such as equity loans, could also be considered to finance remedial measures required by older person households.

Assistance in the home

- 4.41 The 2021 household survey also provides information on a range of practical assistance required from households by age group (Table 4.10). Overall, the highest level of need is for help with repair and maintenance of home. For all types of assistance, the level of need increases with age which includes the need for company/friendship, mentioned by 26.2% of people aged 75 and over.

Table 4.10 Type of assistance required by age group of household reference person (HRP)

Type of help needed now or in next 5 years	Under 65 (%)	65-74 (%)	75+ (%)	All (%)
Help with repair and maintenance of home	30.8%	44.2%	50.6%	34.6%
Help with gardening	16.4%	34.5%	48.8%	22.0%
Help with cleaning home	14.1%	25.4%	46.9%	18.5%
Help with other practical tasks	11.9%	20.0%	32.9%	14.9%
Help with personal care	10.4%	9.5%	32.9%	12.0%
Want company / friendship	10.5%	9.7%	26.2%	11.6%
Base (all households)	44,054	9,901	4,569	58,524

Source: 2021 household survey

Health-related housing need

- 4.42 A range of sources can be drawn upon to establish the overall scale of disability/support needs across the City of Preston. In summary:
- The 2011 Census reported that across the city 80.7% were in very good or good health, 13.2% were in fair health and 6% in bad/very bad health (particularly across older age groups). A total of 25,914 residents (19.2%) were in fair/bad/very bad health which compares with 18.3% across England.
 - 8.7% of residents reported that their daily activities were limited 'a lot' and 9.3% 'a little' which compares with 8.3% and 9.3% respectively across England. This is mainly associated with older age groups.
 - 3,560 people received Disability Living Allowance in 2018 or 2.5% of the population.
 - The ONS Family Resources Survey 2018/19 estimates that around 21% of the population nationally has a disability and provides estimates by age group. Applying these estimates to the City of Preston's population, this translates to around 26,233 across the City in 2021 and is projected to increase to around 28,230 by 2038.
- 4.43 The 2021 household survey data considered illness/disability. There was at least one person with an illness/disability in 25,164 (43%) of households. The survey estimated a total of 55,619 people or 38.9% had an illness/disability

which is higher than the ONS estimates. Table 4.11 shows the number of people stating an illness/disability and the type of illness/disability. The most frequently mentioned illness/disability was long-standing illness or health condition (32.2%) followed by physical/mobility impairment (17.2%) and mental health issue (14.2%).

Table 4.11 Number of people stating illness/disability

Illness/disability	Number of people	% of total Population
Physical/mobility impairment	7,861	17.2%
Learning disabilities	1,329	2.9%
Autism	1,544	3.4%
Mental health issue	6,504	14.2%
Visual impairment	2,707	5.9%
Hearing impairment	4,552	10.0%
Long-standing illness or health condition	14,703	32.2%
Older age related illness or disability (e.g. dementia, stroke)	3,839	8.4%
Other	2,678	5.9%
Total population	142,960	100%
Total number of people with an illness/disability	45,717	37.9%
Households with at least one person with an illness/disability	Number of households	% of households
Total	24,991	42.7%

Source: 2021 household survey

Physical disability

- 4.44 POPPI and PANSI (Projecting Older People Population Information/Projecting Adult Needs and Service Information, Oxford Brookes University/Institute of Public Care) provides data on the likely prevalence in 2020 of a range of physical disabilities and how this is expected to change by 2038 (Table 4.12). In 2020, there were an estimated 8,206 people with mobility issues across all age groups which is projected to increase to 9,149 by 2038 mainly due to an increase in the number of people aged 65 with mobility issues.

Table 4.12 Physical disability prevalence

Disability (age group)	2020	2038	% change 2020-2038
Impaired mobility (18-64)	4,394	4,148	-5.6%
Mobility (unable to manage at least one activity on own) (65+)	3,812	5,002	31.2%
Moderate or serious personal care disability (18-64)	3,905	3,719	-4.8%
Serious visual impairment (18-64)	58	58	-0.3%
Moderate or severe visual impairment (65+)	1,828	2,365	29.4%
Severe hearing loss (18-64)	469	442	-5.7%
Severe hearing loss (65+)	1,638	2,167	32.3%
All with mobility issues (impaired mobility 18-64 and mobility 65+)	8,206	9,149	11.5%

Source: POPPI/PANSI; 2018-based ONS population projections

Learning disability and autism

- 4.45 The number of people across all age groups with moderate or severe learning disabilities is estimated to be around 558 in 2020 rising to 576 by 2038, (Table 4.13). There is a notable growth in the number of people aged 65 and over with learning disabilities. Around 1,109 people have autistic spectrum disorders in 2020 and this is expected to increase to 1,166 by 2038.

Table 4.13 Learning disability and autism

Learning disability (age group)	2020	2038	% change 2020-2038
Total (18-64)	2,192	2,197	0.2%
Total (65+)	438	567	29.4%
Moderate or severe (18-64)	499	501	0.4%
Moderate or severe (65+)	59	76	28.0%
Moderate or severe (all ages)	558	576	3.3%
People with LD living with a parent (18-64)	199	206	3.3%
Downs syndrome (18+)	57	57	0.4%
Challenging behaviour (18-64)	40	40	0.0%
Autistic spectrum disorders (18-64)	910	909	-0.2%
Autistic spectrum disorders (65+)	199	258	29.5%
Autistic spectrum disorders (all ages)	1,109	1,166	5.2%

Source: POPPI/PANSI and 2018-based ONS population projections

- 4.46 The Lancashire County Council Market Position Statement 2019 for adult social care notes:
- A need to develop crisis provision across Lancashire for people with learning disability and/or autism.

- Encourage the development of newer, more innovative and flexible Supported Living accommodation for people with a learning or physical disability, and/or mental health condition.
- 1,091 daytime support places each week are funded for people with learning disabilities, mental health and physical disabilities.
- The County Council has an in-house Supported Living service to support people with a learning disability and/or autism to live in their own home with support and a nationally recognised Shared Lives service which enables people who need support to live in a family setting. These include residential care places, daytime support, respite and rehabilitation beds.

Mental health

- 4.47 2020 POPPI/PANSI data estimates there are around 16,712 residents with a common mental health disorder (Table 4.14). The number of people aged 18-64 with a common mental health disorder is expected to reduce by 0.2% over the period to 2038. However, depression amongst people aged 65 or over is expected to increase considerably.

Table 4.14 Mental health disorder prevalence

Mental health 18-64	2020	2038	% change 2020-2038
Common mental disorder	16,712	16,672	-0.2%
Borderline personality disorder	2,123	2,118	-0.2%
Antisocial personality disorder	3,022	3,015	-0.2%
Psychotic disorder	623	622	-0.2%
Psychotic disorders (2 or more)	6,400	6,385	-0.2%
Older people with depression	2020	2038	% change 2020-2038
Depression 65+	1,807	2,341	30%
Severe depression (65+)	568	742	31%

Source: POPPI/PANSI and 2018-based ONS population projections

Accessible and wheelchair standard housing

- 4.48 PPG states that **‘where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the NPPF). To help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:**
- **M4(1) Category 1: VISIBLE dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement);**
 - **M4(2) Category 2: Accessible and adaptable dwellings; and**
 - **M4(3) Category 3: Wheelchair user dwellings**

‘Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors ’ (source: PPG Paragraphs: 008 Reference ID: 56-008-20160519 & 009 Reference ID: 56-009-20150327).

4.49 Regarding evidencing the need for accessible housing, PPG states:

‘Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- **the likely future need for housing for older and disabled people (including wheelchair user dwellings).**
- **size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).**
- **the accessibility and adaptability of existing housing stock.**
- **how needs vary across different housing tenures.**
- **the overall impact on viability.’** (source: Para: 007 Reference ID: 56-007-20150327).

4.50 Optional accessibility standards for dwellings were introduced by the government in 2015 to provide a mechanism for improving accessibility of housing for those with additional needs. National standards have been established and contained within Part M Volume 1 of the Building Regulations [click here for Building Regulations](#) as set out in Table 4.15. Only one accessible housing standard can apply to any dwelling. The M4(2) accessible and adaptable dwelling standard is based on, and in 2015 effectively replaced, the ‘Lifetime Homes’ standard.

Table 4.15 Summary of accessible housing standards

Standard Label	Standard title	Level of accessibility provided	Mandatory or optional
M4(1)	Visitable dwellings	Level access not necessarily provided into the dwellings – few accessibility features	Mandatory
M4(2)	Accessible and adaptable dwellings	Level access is provided into the dwelling – easy to adapt to make more accessible – not suitable for most wheelchair users	Optional
M4(3)	Wheelchair user dwellings	Dwellings suitable for wheelchair users: either wheelchair adaptable (a) or wheelchair accessible (b)	Optional

4.51 It should be noted that Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily

adapted to meet the needs of a household including wheelchair users) dwellings (source: PPG Paragraph: 009 Reference ID: 56-009-20150327).

M4(3) wheelchair accessible standard need

- 4.52 In order to establish an appropriate target for M4(3) dwellings, Table 4.16 sets out a series of assumptions regarding wheelchair use from the English Housing Survey and a report by Aspire Housing Association. Applying these assumptions would suggest a target of 4% of newbuild to meet M4(3) wheelchair accessible standard is required.
- 4.53 According to PPG (source: PPG Paragraph: 009 Reference ID: 56-009-20150327), 'Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.' This would imply that the onus on wheelchair accessible housing delivery is with the local authority/registered providers, but private developers should also be encouraged to build to M4(3) wheelchair accessible or adaptable homes where appropriate. Any final targets should be set within the context of likely levels of delivery.

Table 4.16 Wheelchair use assumptions and resulting annual need

Assumption	% requirement	Number each year (based on 490 annual housing need)
Wheelchair use from the English Housing Survey 2018/19 – households using wheelchair all the time	0.6%	3
Wheelchair use from the English Housing Survey 2018/19 – households using wheelchair either indoors or outdoors	3.0%	15
City of Preston has 1,288 current users of wheelchairs inside and outside the home based on 2021 household survey. This equates to 2.2% of households.	2.2%	11
Aspire report on wheelchair accessible housing (*)	10%	49
Average of indicators	3.8%	19

(*) Wheelchair Accessible Housing: Waiting for appropriate housing in England, Aspire October 2014 recommends that the national government should set a minimum requirement of 10% of all new build properties across all tenures to be wheelchair accessible.

- 4.54 Table 4.17 considers the profile of wheelchair accessible or adaptable dwellings needed by number of bedrooms and age group of the Household Reference Person.

Table 4.17a Wheelchair dwellings needed by age group and number of bedrooms (table percentage)

Age group	1	2	3	Total
Under 65	16.4	36.3	27.1	79.8
65 and over	20.2	0.0	0.0	20.2
Total	36.6	36.3	27.1	100

Table 4.17b Wheelchair dwellings needed by age group and number of bedrooms (needed each year by age group)

Age group	1	2	3	Total
Under 65	3	7	5	15
65 and over	4	0	4	4
Total	7	7	9	19

Source: 2021 household survey

Note: The annualised figure of 19 is based on the average of indicators in Table 4.16.

M4(2) accessible and adaptable homes

4.55 This standard is effectively the 'lifetime homes' standard. Features of an M4(2) home include:

- Within the curtilage of the dwelling, or of the building containing the dwelling, it is possible to approach and gain step-free access to the dwelling and to any associated parking space and communal facilities intended for the occupants to use.
- There is step-free access to the WC and other accommodation within the entrance storey and to any associated private outdoor space directly connected to the entrance storey.
- A wide range of people, including older and disabled people and some wheelchair users, are able to use the accommodation and its sanitary features.
- Features are provided to enable common adaptations to be carried out in the future to increase the accessibility and functionality of the dwelling.
- Wall mounted switches, socket outlets and other controls are reasonably accessible to people who have reduced reach.

4.56 Table 4.18 provides a summary of indicators to help establish the need for M4(2) adapted accommodation.

Table 4.18 Indicators of the need for adapted accommodation

Indicator	Data	Source
Population aged 65 and over	15% in 2021 increasing to 22.8% by 2038	ONS 2018-based population projections
% population with mobility issues	18% (2020) and 18.2% (2040)	PANSI
% population with long-term health problem or disability (day to day activities limited a little or a lot)	18%	2021 Census

4.57 Given the ageing demographic of the City of Preston and the identified levels of disability amongst the population, it is recommended that a policy to provide new homes built to accessibility standards is included in the Local Plan. On the basis of available evidence which takes into account the requirements of PPG, it is recommended that:

- 4% of new dwellings are built to M4(3) wheelchair accessible standard (this would imply an average target of around 19 each year); and
- All remaining dwellings are built to M4(2) accessible and adaptable standards to take account of the ageing demographics of the borough. This will ensure that new dwellings can be occupied and also visited by people needing accessible/adaptable dwellings.

4.58 It should be noted however that any percentage requirements for accessible housing are subject to cumulative viability testing. It is also recommended that needs are monitored closely given the ageing population over the plan period.

Stakeholder views on specialist housing

4.59 As general points, stakeholders commented that :

- There needs to be focus on building 1 and 2 bedroom specialist dwellings for smaller family units and singles.
- Provision of Extra Care type accommodation for younger adults with support needs is a particular priority.
- Space standards in properties need to be adequate for ease of movement for elderly and visually/physically impaired.
- Consideration given to fixtures and fittings for elderly, visually/physically impaired and people experiencing dementia.
- General support to tackle social isolation and loneliness would be welcome.

Life experience-related housing need

Armed forces

- 4.60 The council is a signatory to the Armed Forces Covenant which seeks to provide support in a range of areas including housing to in-service and ex-service personnel.
- 4.61 The Government's First Homes policy identifies people connected with the Armed Forces as an eligible group for First Homes.

Cultural heritage related housing need

- 4.62 For those from a minority ethnic background there may be cultural heritage or religion related determined needs which impact on the type of accommodation required. This would include the specific needs of particular Black, Asian and Minority ethnic (BAME – households not identifying as 'White British') households as well as those from Travelling communities.

BAME population and households

- 4.63 Around 19.8% of the population in the City of Preston identify as BAME. The distribution of BAME people within the City is shown in Table 4.19. The majority of BAME people live in the central and eastern sub-areas and particularly in City Centre, Deepdale and Fishwick & Frenchwood wards.
- 4.64 The household survey identified 12,619 households (21.8%) where the household reference person identified as BAME. Overall, 26.6% of BAME households were in some form of housing need compared with 19.1% of all households. Key reasons for BAME housing need included overcrowding and separate families sharing kitchens and bathrooms.
- 4.65 Further analysis of BAME need indicates that 29.6% of households would consider moving to a market property, 17.4% an affordable rented and 19.7% an affordable home ownership property. The overall range of dwellings being considered is summarised in Table 4.21 which shows a strong demand for 3 and 4 or more bedroom dwellings.

Table 4.19 Distribution of BAME households across the City of Preston

Sub-area	Ward/Parish	BAME residents	% of BAME residents in each area	% of all residents in each area who are BAME	All residents
Central	City Centre	3,016	10.9%	27.5%	10,962
Central	Deepdale	5,308	19.1%	56.0%	9,485
Central	Fishwick & Frenchwood	4,685	16.9%	47.5%	9,856
Central	Plungington	2,081	7.5%	17.2%	12,077
Central	St Matthew's	3,608	13.0%	36.7%	9,843
CENTRAL	TOTAL	18,698	67.3%	35.8%	52,223
East	Brookfield	972	3.5%	12.2%	7,981
East	Ribbleton	802	2.9%	9.0%	8,884
EAST	TOTAL	1,774	6.4%	10.5%	16,865
North	Cadley	746	2.7%	8.9%	8,412
North	Garrison	2,055	7.4%	22.4%	9,156
North	Greyfriars	1,065	3.8%	14.0%	7,582
North	Sharoe Green	1,338	4.8%	16.3%	8,204
NORTH	TOTAL	5,204	18.7%	15.6%	33,354
West	Ashton	791	2.8%	8.7%	9,044
West	Ingol & Cottam	546	2.0%	6.5%	8,395
West	Lea & Larches	452	1.6%	5.0%	9,097
WEST	TOTAL	1,789	6.4%	6.7%	26,536
Rural East	Broughton	92	0.3%	5.3%	1,722
Rural East	Grimsargh	54	0.2%	2.0%	2,653
Rural East	Haighton	8	0.0%	4.0%	202
Rural East	Whittingham	30	0.1%	1.5%	2,027
RURAL EAST	TOTAL	184	0.7%	2.8%	6,604
Rural North	Barton	30	0.1%	2.6%	1,150
Rural North	Goosnargh	21	0.1%	1.6%	1,316
Rural North	Woodplumpton	87	0.3%	4.0%	2,154
RURAL NORTH	TOTAL	138	0.5%	3.0%	4,620
PRESTON	TOTAL	27,787	100.0%	19.8%	140,202

Source: 2011 Census

Table 4.20 Summary of BAME dwelling likes and expectations

Dwelling type and size	Like %	Expect %	Blend of like/expect %
1 bedroom house	0.0	0.0	0.0
2 bedroom house	15.9	16.9	16.4
3 bedroom house	29.1	33.9	31.5
4+ bedroom house	40.7	33.9	37.3
1 bedroom flat	1.6	1.6	1.6
2 bedroom flat	4.6	8.0	6.3
3+ bedroom flat	2.4	1.0	1.7
1 bedroom bungalow	0.0	0.0	0.0
2 bedroom bungalow	3.9	3.9	3.9
3+ bedroom bungalow	1.7	0.8	1.3
Total	100.0	100.0	100.0
Base	5,323	5,335	5,329

Source: 2021 household survey

4.66 Overall, 33.4% of households who are in housing need identify as BAME. Table 4.21 considers the number of bedrooms needed compared with all households who are in housing need. This demonstrates that around 30% of BAME households require a property with 4 or more bedrooms.

Table 4.21 Households in housing need: number of bedrooms required by ethnicity

Number of bedrooms needed	BAME %	Non-BAME %	Total %
1	14.3	53.6	40.4
2	26.0	25.5	25.6
3	29.9	15.3	20.2
4	26.2	5.6	12.5
5 or more	3.7	0.0	1.2
Total	100.0	100.0	100.0
Base	3,434	6,812	10,246

4.67 As part of stakeholder consultation, a focus group discussion took place with the Preston Asian Housing Engagement Group to consider the specific needs of Asian heritage households. Key points raised included:

- A need to recognise the specific needs of the Asian community when considering housing need. The group were concerned that despite existing evidence of the needs from Asian households, this has not filtered into strategic thinking.
- There is a need for larger 5-6 bedroom dwellings, and the group reported about 30% of Asian households are overcrowded (which the 2021 survey confirmed was a key reason why households were in need).

- There are specific housing and support needs amongst Asian elders. Those living on their own can feel isolated. It may be appropriate to provide accommodation in a setting where people can interact and engage with others whilst maintaining their own independent homes.
- There needs to be a better understanding of the cultural and religious needs of Asian households. For instance, there is a lack of new provision for multi-generational families and living in proximity to mosques and temples is important. For younger people who move out of the family home, being close to their parents to provide support is important. This also supports community sustainability. Living in some areas is challenging due to racism and not being close to cultural facilities.
- Whilst Asian households like to own their own homes, there are social and affordable home options – particularly for larger dwellings which should be considered. There are larger owner occupied and private rented homes but these are often in larger Victorian houses which may not meet aspirations, be of poor quality and too expensive to modernise. There is a lack of environmentally friendly accommodation.
- There is a lack of larger affordable dwellings available. There is also a lack of understanding within the community about affordable home ownership options.
- The group strongly recommends that a housing association considers the development of some larger dwellings to reflect the underlying needs of the Asian community which are evidenced by the Housing Engagement Group and also from the 2021 household survey. Households tend to apply for affordable housing if it's likely be available – hence registers tend to have applicants for smaller properties. If 5 bed properties are not available, people are not necessarily going to apply for them.

4.68 Given the ethnic profile of Preston and long-standing concerns of a lack of appropriate housing provision for BAME groups, in particular from the Asian Community, it is recommended that that the council takes into account the specific needs of BAME communities and reflected in housing and planning policies. It is recommended that:

- The specific need for larger family accommodation with at least 5 bedrooms is recognised to meet the needs of some BAME households, particularly in the central area of Preston.
- A programme for delivering larger affordable dwellings is developed. A specific target should be set for the delivery of larger properties based on the evidence in Table 4.21 and the overall gross affordable need set out in Table C.10. There is an overall gross need for 8.6% of all affordable dwellings to have 4 or more bedrooms.
- To recognise the specific needs of BAME communities, 7.5% of new affordable dwellings should have 4 bedrooms and 1.1% of all new affordable dwellings should have 5 or more bedrooms. Table 4.22 sets out how this figure is derived.

Table 4.22 Calculating the need for larger affordable dwellings

Report Table	Data
From Table 4.21	A. 26.2% of BAME households in housing need require 4 bedrooms and 3.7% require 5 or more bedrooms. This sums to 29.9%. B. This translates to 87.6% need 4 bedrooms and 12.4% need 5 or more bedrooms
From Table C.10	8.6% of gross need is for affordable dwellings with 4 or more bedrooms. Based on the BAME need summarised at B., 87.6% of the 8.6% gross need is for 4 bedroom dwellings (7.5%) and 12.4% of the gross need is for 5 bedroom dwellings (1.1%)

Gypsy, Traveller and Travelling Showperson need

- 4.69 The 2019 Central Lancashire Gypsy and Traveller Accommodation Assessment identified an overall need for 30 residential pitches over the period 2019/20 to 2035/36, of whom 28 are for households who have a nomadic habit of life and meet the definition of Traveller in the Planning Policy for Traveller Sites. No need was identified for Travelling Showperson plots. There was a need for 5 transit pitches accommodating up to 10 caravans but it was recommended this could be met through a sub-regional transit site. A new GTAA is currently being prepared as part of the Central Lancashire Local Plan review.

Other groups with particular housing requirements

- 4.70 This chapter concludes with a summary of the other household groups who have particular housing requirements in the City of Preston.

People who rent their homes

- 4.71 Chapter 4 presents a range of data on the characteristics of households who rent their homes – either privately or from a social housing provider.

Self-build and custom housebuilding

- 4.72 The NPPF 2021 set out that the government wants to enable more people to build their own homes and wants to make this form of housing a mainstream housing option.
- 4.73 There are currently 4 households on the council's self-build register who tend to prefer living in rural areas.

Student housing need

- 4.74 A comprehensive assessment of student housing need was carried out by Cushman and Wakefield in 2019. This report concluded that:
- Student numbers at the University of Central Lancashire (UCLan) have not grown as anticipated by the 2012 Local Plan. Despite this, purpose-built

student accommodation (PBSA) has and continues to be developed. Over 1,000 PBSA bedspaces have been built since 2016 at a time when bedspace demand has been falling.

- The development of pipeline PBSA is not being driven by student demand but by development appraisals and perceived financial returns.
- Falling numbers of students living in HMOs.
- An unhealthy student to bed ratio in Preston has resulted in a large number of voids in purpose-built stock.
- A lack of quality in the general market.
- There continues to be a need to deliver better quality, largely en-suite schemes that support modern student living habits and enhance the student experience.

4.75 Regarding future policy, the report concluded:

- There is a need for UCLan to work proactively with the council to oppose unsuitable schemes going forward.
- The university should consider guaranteeing accommodation to first year students which is a key tool in recruiting students.
- Students wish to live as close to campus as possible. Priority should be given to applications close to campus, with a presumption against those located more than 10 minutes from the campus edge.
- There is a lack of quality in the PBSA market, with a lack of social and amenity spaces. The council may look to impose minimum standards in terms of the amount of social space offered by developments so that new schemes can only raise the quality of stock of Preston.
- Limited demand for studio bed spaces which is reflected in void levels and change of use to house key workers.
- The council should prepare for a reduction in the number of students in HMOs, but with potential for higher quality schemes overall.

Conclusion

4.76 In accordance with PPG, this housing need and demand study has considered the future need for specialist accommodation, the need for residential care and considered the role of general housing in meeting needs, in particular bungalows and homes that can be adapted to meet a change in needs.

4.77 The number of households headed by someone aged 65 or over is expected to increase by 4,109 (29.2%) by 2038. According to the 2021 household survey, 46.7% of older people want to remain in their current home with help and support when needed, such as help with repair and maintenance. There is also interest in a range of options including open market, rented from a housing association/council, sheltered and co-housing. There is a need to deliver a range of smaller dwellings (particularly level-access accommodation) for older people across all tenures and specialist older persons housing provision.

- 4.78 Across the City of Preston there are around 5,474 units of specialist older persons accommodation comprising 3,078 specialist older accommodation (C3 planning use class) and 2,396 units of residential care (C2 use class)
- 4.79 Based on population projections, there is a need for 1,903 additional units of specialist older persons' accommodation by 2038.
- 4.80 The HNDA does not specify the precise nature of specialist older person dwellings to be built. This is to allow flexibility in delivery and PPG states that 'any single development may contain a range of different types of specialist housing' (source: PPG June 2019 Paragraph: 010 Reference ID: 63-010-20190626).
- 4.81 A key conclusion is that there needs to be a broader housing offer for older people across the city and the HNDA has provided evidence of the scale and range of dwellings needed.
- 4.82 A wealth of information has been assembled from various sources which helps to scope out the likely level of disability across the city's population. Although it is a challenge to quantify the precise accommodation and support requirements, the HNDA has helped to scope out where needs are arising and has provided indicators of specific needs across various needs groups.
- 4.83 It is estimated there are around 26,233 people with a disability across the City of Preston based on ONS disability estimates but the 2021 household survey suggested a much higher figure of 55,619. Regarding housing for people with disabilities, the 2021 household survey suggests around 7.8% of households live in properties which have either been purpose-built or adapted for someone with an illness or disability. 14.2% of households need all facilities (living room, bathroom, kitchen and bedroom) to be on one floor.
- 4.84 Given the ageing population of the city and the identified levels of disability amongst the population, it is recommended that 4% of new dwellings are built to wheelchair accessible M4(3) standard. All social rented and 20% of market dwellings should be built to M4(2) accessible and adaptable standard, to take account of the ageing demographics of the City of Preston.
- 4.85 There is limited need for self-build plots.
- 4.86 The need for student accommodation continues but future delivery needs to be carefully considered. There is an oversupply of student accommodation reflected in void rates and reduced demand. Some existing purpose-built student accommodation does not meet the aspirational standards of students, leading to voids in studio units. Any future PBSA needs to be carefully considered by the council and UCLan and should be to address gaps in quality of provision rather than meet a growing student demand.
- 4.87 There is a specific need from BAME communities, particularly Asian households, for larger dwellings. It is recommended that 7.5% of new affordable dwellings have 4 bedrooms and 1.1% have 5 or more bedrooms to help meet the needs of Asian households.

5. Overall housing need, dwelling type and mix

Introduction

- 5.1 This chapter considers overall housing need, affordable need and establishes an overall dwelling type, size and tenure mix for the City of Preston. The detailed analysis underpinning this chapter is presented in Technical Appendix D.

Overall housing need

- 5.2 The Central Lancashire Housing Needs Assessment 2022 has identified an annual need for 490 dwellings across the City of Preston over the plan period 2023 to 2038.

Affordable housing need

- 5.3 A detailed analysis of affordable housing need in accordance with PPG is presented at Technical Appendix C. **This establishes an overall gross affordable need of 1,227 and after taking into account affordable lettings and newbuild the net shortfall is 395 each year.**
- 5.4 Analysis in the HNDA would suggest an overall affordable tenure split of 88% social/affordable rented and 12% affordable home ownership across the City of Preston excluding an allowance for First Homes. With First Homes, the tenure split is 68% rented and 32% affordable home ownership.

Dwelling type and mix

- 5.5 Dwelling mix analysis is underpinned by a demographic scenario model which takes into account projected household change to 2038 using 2018-based ONS household projections. To support flexibility in delivery, dwelling type and mix by tenure is presented as a broad range. Further detail of the modelling is presented at Technical Appendix D. Analysis also considers the range of dwellings by sub-area and tenure,
- 5.6 There are four main data sources which underpin the analysis:
- household projections;
 - dwelling stock information;
 - data identifying the relationships between households and dwellings derived from the 2021 household survey; and
 - data derived from affordable housing need analysis.
- 5.7 Modelling also considers the dwelling type aspirations and expectations of households and the number of bedrooms needed.
- 5.8 Table 5.1 provides an overview of the range of dwellings needed across the City of Preston annually. This helps to establish the broad range of dwellings needed for all households in line the requirements of the NPPF. So, as an example, for market dwellings it would be appropriate for the overall profile of

dwellings built each year to be 10-15% 2 bedroom houses, 30-35% 3 bedroom houses etc. It does not mean that every scheme brought forward needs to meet this dwelling type and mix, but rather the overall range of dwellings built should seek to reflect this profile.

- 5.9 Further analysis set out in Table 5.2 to 5.4 set out the dwelling mix by sub-areas for affordable/social rented dwellings (Table 5.2), affordable home ownership (Table 5.3) and Market dwellings (Table 5.4).
- 5.10 It is important that both planners and developers maintain a flexible approach to what is built within the City of Preston and recognise that in some areas development may be restricted to particular types of dwelling, but this analysis helps determine the relative priorities of development in particular sub-areas and parishes.

Table 5.1 Summary of overall dwelling mix by tenure

Dwelling type/size	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1-bedroom house	0-2%	2-5%	0-2%	0-2%
2-bedroom house	10-15%	20-25%	10-15%	15-20%
3-bedroom house	35-40%	20-25%	25-30%	35-40%
4 or more-bedroom house	15-20%	5-10%	30-35%	20-25%
1-bedroom flat	0-2%	10-15%	2-5%	5-10%
2-bedroom flat	0-2%	15-20%	5-10%	5-10%
3 or more -bedroom flat	0-2%	0-2%	0-2%	2-5%
1-bedroom bungalow/level-access/other	2-5%	10-15%	0-2%	0-2%
2-bedroom bungalow/level-access/other	10-15%	5-10%	5-10%	5-10%
3 or more-bedroom bungalow/ level-access/other	10-15%	2-5%	5-10%	5-0%
Dwelling type	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
House	70-75%	50-55%	75-80%	70-75%
Flat	2-5%	25-30%	5-10%	15-20%
Bungalow/level-access/other	25-30%	15-20%	10-15%	5-10%
Number of bedrooms	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1	5-10%	20-25%	2-5%	10-15%
2	25-30%	40-45%	25-30%	25-30%
3	50-55%	20-25%	35-40%	40-45%
4	15-20%	5-10%	30-35%	20-25%

Table 5.2 Affordable (social/rented) need by sub-area and rural parish

Sub Area	1- bedroom house	2- bedroom house	3- bedroom house	4 or more - bedroom house	1- bedroom flat	2- bedroom flat	3 or more- bedroom flat	1- bedroom bungalow*	2- bedroom bungalow*	3 or more bedroom- bungalow*
Central	5-10%	10-15%	15-20%	10-15%	10-15%	20-25%	0-2%	10-15%	2-5%	2-5%
East	0-2%	25-30%	25-30%	5-10%	5-10%	15-20%	0-2%	2-5%	2-5%	5-10%
North	2-5%	15-20%	15-20%	2-5%	15-20%	5-10%	0-2%	15-20%	15-20%	5-10%
West	0-2%	40-45%	20-25%	0-2%	10-15%	2-5%	0-2%	10-15%	5-10%	0-2%
Preston Rural East	2-5%	0-2%	50-55%	2-5%	15-20%	2-5%	0-2%	10-15%	5-10%	2-5%
Preston Rural North	2-5%	5-10%	20-25%	25-30%	15-20%	5-10%	0-2%	5-10%	5-10%	0-2%
Preston City Total	2-5%	20-25%	20-25%	5-10%	10-15%	15-20%	0-2%	10-15%	5-10%	2-5%
Parish	1- bedroom house	2- bedroom house	3- bedroom house	4 or more - bedroom house	1- bedroom flat	2- bedroom flat	3 or more- bedroom flat	1- bedroom bungalow*	2- bedroom bungalow*	3 or more bedroom- bungalow*
Barton	2-5%	5-10%	40-45%	30-35%	0-2%	2-5%	0-2%	2-5%	5-10%	2-5%
Broughton	0-2%	5-10%	30-35%	15-20%	2-5%	10-15%	0-2%	0-2%	5-10%	10-15%
Goosnargh	2-5%	10-15%	45-50%	5-10%	15-20%	5-10%	0-2%	0-2%	0-2%	5-10%
Grimsargh	0-2%	5-10%	25-30%	20-25%	5-10%	2-5%	0-2%	5-10%	20-25%	5-10%
Haighton	2-5%	5-10%	45-50%	30-35%	5-10%	2-5%	0-2%	0-2%	0-2%	2-5%
Whittingham	0-2%	2-5%	25-30%	15-20%	15-20%	5-10%	0-2%	2-5%	10-15%	15-20%
Woodplumpton	0-2%	2-5%	25-30%	30-35%	5-10%	15-20%	0-2%	0-2%	10-15%	0-2%

Source: 2021 household survey

*bungalow/level-access/other

Table 5.3 Affordable (affordable home ownership) need by sub-area and rural parish

Sub Area	1- bedroom house	2- bedroom house	3- bedroom house	4 or more - bedroom house	1- bedroom flat	2- bedroom flat	3 or more- bedroom flat	1- bedroom bungalow*	2- bedroom bungalow*	3 or more bedroom- bungalow*
Central	0-2%	15-20%	25-30%	35-40%	0-2%	5-10%	0-2%	0-2%	2-5%	0-2%
East	0-2%	0-2%	20-25%	40-45%	15-20%	0-2%	0-2%	0-2%	0-2%	15-20%
North	0-2%	2-5%	20-25%	25-30%	0-2%	2-5%	0-2%	0-2%	15-20%	20-25%
West	0-2%	15-20%	50-55%	15-20%	0-2%	0-2%	0-2%	0-2%	0-2%	10-15%
Preston Rural East	0-2%	10-15%	25-30%	30-35%	0-2%	0-2%	0-2%	0-2%	10-15%	10-15%
Preston Rural North	0-2%	10-15%	25-30%	30-35%	0-2%	10-15%	0-2%	0-2%	10-15%	0-2%
Preston City Total	0-2%	10-15%	25-30%	30-35%	2-5%	5-10%	0-2%	0-2%	5-10%	5-10%
Parish	1- bedroom house	2- bedroom house	3- bedroom house	4 or more - bedroom house	1- bedroom flat	2- bedroom flat	3 or more- bedroom flat	1- bedroom bungalow*	2- bedroom bungalow*	3 or more bedroom- bungalow*
Barton	0-2%	10-15%	25-30%	30-35%	0-2%	10-15%	0-2%	0-2%	10-15%	0-2%
Broughton	0-2%	10-15%	25-30%	30-35%	0-2%	0-2%	0-2%	0-2%	10-15%	10-15%
Goosnargh	0-2%	10-15%	25-30%	30-35%	0-2%	10-15%	0-2%	0-2%	10-15%	0-2%
Grimsargh	0-2%	10-15%	25-30%	30-35%	0-2%	0-2%	0-2%	0-2%	10-15%	10-15%
Haighton	0-2%	10-15%	25-30%	30-35%	0-2%	0-2%	0-2%	0-2%	10-15%	10-15%
Whittingham	0-2%	10-15%	25-30%	30-35%	0-2%	0-2%	0-2%	0-2%	10-15%	10-15%
Woodplumpton	0-2%	10-15%	25-30%	30-35%	0-2%	10-15%	0-2%	0-2%	10-15%	0-2%

Source: 2021 household survey

Note: The data for individual parishes were based on small samples to data for corresponding rural ward have been used to express the range of affordable home ownership dwelling types and sizes

*bungalow/level-access/other

Table 5.4 Market mix by sub-area and rural parish

Sub Area	1- bedroom house	2- bedroom house	3- bedroom house	4 or more - bedroom house	1- bedroom flat	2- bedroom flat	3 or more- bedroom flat	1- bedroom bungalow*	2- bedroom bungalow*	3 or more bedroom- bungalow*
Central	0-2%	20-25%	30-35%	20-25%	0-2%	5-10%	0-2%	0-2%	5-10%	2-5%
East	0-2%	0-2%	35-40%	25-30%	10-15%	0-2%	0-2%	0-2%	10-15%	10-15%
North	0-2%	5-10%	25-30%	25-30%	0-2%	2-5%	0-2%	0-2%	10-15%	20-25%
West	0-2%	10-15%	35-40%	15-20%	0-2%	0-2%	0-2%	2-5%	10-15%	10-15%
Preston Rural East	0-2%	2-5%	15-20%	40-45%	0-2%	2-5%	0-2%	0-2%	10-15%	15-20%
Preston Rural North	0-2%	5-10%	25-30%	35-40%	0-2%	0-2%	0-2%	0-2%	10-15%	10-15%
Preston City Total	0-2%	10-15%	35-40%	15-20%	0-2%	0-2%	0-2%	2-5%	10-15%	10-15%
Parish	1- bedroom house	2- bedroom house	3- bedroom house	4 or more - bedroom house	1- bedroom flat	2- bedroom flat	3 or more- bedroom flat	1- bedroom bungalow*	2- bedroom bungalow*	3 or more bedroom- bungalow*
Barton	0-2%	10-15%	30-35%	20-25%	0-2%	5-10%	0-2%	0-2%	10-15%	10-15%
Broughton	0-2%	5-10%	25-30%	40-45%	0-2%	2-5%	0-2%	0-2%	2-5%	10-15%
Goosnargh	0-2%	15-20%	75-80%	0-2%	0-2%	0-2%	0-2%	0-2%	0-2%	5-10%
Grimsargh	2-5%	0-2%	15-20%	40-45%	2-5%	0-2%	0-2%	0-2%	20-25%	5-10%
Haighton	0-2%	0-2%	0-2%	50-55%	0-2%	0-2%	0-2%	0-2%	0-2%	50-55%
Whittingham	0-2%	5-10%	15-20%	40-45%	2-5%	2-5%	0-2%	0-2%	5-10%	15-20%
Woodplumpton	0-2%	0-2%	10-15%	50-55%	0-2%	2-5%	0-2%	0-2%	15-20%	10-15%

Source: 2021 household survey

*bungalow/level-access/other

Conclusions

- 5.11 The Central Lancashire Housing Needs Study 2019 has established an annual need for 490 dwellings across the City of Preston over the plan period 2023 to 2038.
- 5.12 The HNDA has established future household change and the implications this has for dwelling type, size and tenure mix. This helps the council and its partners make informed decisions on the range and size of dwellings to be built to meet need over the period to 2038.
- 5.13 Given the level of affordable need (395 each year), the Local Plan needs to maintain a robust affordable housing policy setting out targets and tenure split. An affordable policy should therefore continue to support the ongoing delivery of affordable housing and diversify the affordable products available to local residents to reflect identified needs.

6. Conclusion: policy and strategic issues

- 6.1 This document has been prepared to equip the council and their partners with robust, defensible and transparent information to help inform strategic decision-making and the formulation of appropriate housing and planning policies. The work also takes account of existing and emerging government policy and guidance.
- 6.2 The City of Preston HNDA will help the council plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Specifically, the HNDA identifies the size, type and tenure of housing required by considering current market demand relative to supply; and also identifies a continued affordable housing imbalance across the city.
- 6.3 This concluding chapter summarises key messages from the research findings, structured around a commentary on the current and future housing markets and key local strategic issues.

Overall Housing need

- 6.4 The Central Lancashire Housing Needs Assessment 2022 has identified an annual need for 490 dwellings across the City of Preston over the plan period 2023 to 2038.

Dwelling type, tenure and mix

- 6.5 The relationship between household change and dwelling type/size and tenure requirements have been fully explored. The evidence will help the council deliver an appropriate range of dwelling stock for residents over the plan period. The overall dwelling mix is summarised in Table 6.1.

Table 6.1 Summary of overall annual dwelling mix required by tenure

Dwelling type/size	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1-bedroom house	0-2%	2-5%	0-2%	0-2%
2-bedroom house	10-15%	20-25%	10-15%	15-20%
3-bedroom house	35-40%	20-25%	25-30%	35-40%
4 or more-bedroom house	15-20%	5-10%	30-35%	20-25%
1-bedroom flat	0-2%	10-15%	2-5%	5-10%
2-bedroom flat	0-2%	15-20%	5-10%	5-10%
3 or more -bedroom flat	0-2%	0-2%	0-2%	2-5%
1-bedroom bungalow/level-access	2-5%	10-15%	0-2%	0-2%
2-bedroom bungalow/level-access	10-15%	5-10%	5-10%	5-10%
3 or more-bedroom bungalow/level-access	10-15%	2-5%	5-10%	5-10%
Dwelling type	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
House	70-75%	50-55%	75-80%	70-75%
Flat	2-5%	25-30%	5-10%	15-20%
Bungalow/level-access	25-30%	15-20%	10-15%	5-10%
Number of bedrooms	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1	5-10%	20-25%	2-5%	10-15%
2	25-30%	40-45%	25-30%	25-30%
3	50-55%	20-25%	35-40%	40-45%
4	15-20%	5-10%	30-35%	20-25%

6.6 Regarding affordable need, there is an annual net shortfall of 395 dwellings. However, delivery of affordable housing is subject to economic viability and the council does not need to plan to meet this number in full. The current affordable housing target is set out in the Council's Affordable Housing Supplementary Planning Document (SPD):

- 30% on market housing schemes in urban areas;
- 35% in rural areas on site in or adjoining villages which have or will have a suitable range of services; and
- 100% on any rural exception sites, including those in the green belt.

6.7 A recommended affordable tenure split for the City of Preston is 68% rented and 32% affordable home ownership including First Homes.

Meeting the needs of older people and those with disabilities

- 6.8 There is evidence to support a programme of accommodation delivery to help meet the needs of older people and those with disabilities. Although the majority of older people want to remain in their own home with support when needed, there is a need to diversify options available to older people wanting to move to more appropriate accommodation.
- 6.9 Currently there are around 5,474 units of specialist older person accommodation comprising 2,396 units of residential care (C2 use class) dwellings and 3,078 units of specialist older person dwellings (C3 use class) such as sheltered and Extra Care. Analysis of demographic change would suggest a need for an additional 1,903 units comprising 833 residential (C2) units and 1,070 older person (C3) dwelling units by 2038. The C3 units should be included in the overall housing targets: the annual need is 59 (based on the period 2021 to 2038) which represents 12% of the 490 annual housing need for 2023 to 2038. Delivery of C2 units would be in addition to this figure.
- 6.10 A key conclusion is that there needs to be a broader housing offer for older people across the City of Preston and this HNDA has provided evidence of scale and range of dwellings needed.
- 6.11 A range of information has been assembled from various sources which helps to scope out the likely level of disability across the City of Preston's population. The strategic need for different types of accommodation has been evidenced using available information including the Lancashire County Council Market Position Statement.
- 6.12 Given the ageing population of the city and the identified levels of disability amongst the population, it is recommended that 4% of new dwellings are built to M4(3) wheelchair accessible and adaptable standard. All other dwellings should be built to M4(2) accessible and adaptable standard to take account of the ageing demographics of the City of Preston.
- 6.13 It is expected that some of this need will be met through the development of C3 accommodation and there is overlap between affordable, specialist older person and M4(3) need. For instance the development of an older person's level access, wheelchair accessible affordable dwelling would help address three aspects of housing need.
- 6.14 It is also assumed that there will be ongoing adaptation of existing dwellings to support those with additional needs.

Summary of policy recommendations

Theme	Data	Action
Overall housing need	490 each year 2023-2038 based on Central Lancashire Housing Needs Assessment	Housing need figure to be noted
Affordable housing need	Annual imbalance of 395 which justifies need for robust affordable housing policy and delivery	Affordable housing policy to maximise delivery on market sites subject to viability and consider new ways of delivering affordable, particularly social rented housing.
	Affordable tenure mix of 88% rented and 12% affordable home but if First Homes are included the tenure split is 68% rented and 32% affordable home ownership	Impact of First Homes needs careful evaluation and methods to maximise social rented housing to be considered
Needs of different groups	4% of new dwellings to be M4(3) wheelchair accessible All new affordable and market dwellings to be built to M4(2) standard	Update relevant policies
	1,903 additional units of accommodation for older people by 2038 or 106 each year	Diversify range of older persons accommodation including sheltered/retirement, Extra Care and cohousing. Continue to review need for residential care Strengthen policies to enable people to live in their own homes for longer with appropriate support and adaptation
	There is a specific need from BAME households, particularly Asian community households for larger dwellings	7.5% of new affordable dwellings should have 4 bedrooms and 1.1% have 5 or more bedrooms to meet the needs of larger families, particularly those from the Asian community.
	Other needs groups	Ongoing review of need for specialist housing and build upon the needs evidence in this HNDS

Final comments

- 6.15 The evidence presented in this HNDA suggests that there are three main policy areas that require particular attention from both a planning policy and social policy perspective:
- the challenge of enabling the quantity and mix of housing that needs to be delivered, including an appropriate level of affordable housing;
 - the challenge of ensuring that the housing and support needs of older people are met going forward; and
 - the challenge of ensuring that the needs of people with disabilities is appropriately addressed.

Technical Appendix A: Research methodology

Overall approach

- A.1 A multi-method approach was adopted in order to prepare a robust and credible housing needs assessment for the City of Preston:
- a comprehensive household survey which achieved 1,563 responses, from 16,425 households, representing a response rate of 10% and a sample error of +/- 2.4%
 - a survey of key stakeholders including representatives from the council, neighbouring local authorities, housing associations, specialist housing providers, estate agents, adult social care and developers;
 - interviews with estate and letting agents operating within the city;
 - a review of relevant secondary data including the 2011 Census, house price trends, CORE lettings data and DLUHC Statistics.

Technical Appendix B: Affordable housing definitions

Affordable housing definitions

Definitions relating to affordable housing are presented in the NPPF 2021 (Annex 2):

Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the government's rent policy for social rent or affordable rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes, affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and Rent to Buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to government or the relevant authority specified in the funding agreement.

Technical Appendix C: Housing need calculations

Introduction

- C.1 Identifying the scale of affordable housing need is a key consideration of planning practice guidance. This is a separate calculation to the overall housing need figure derived using the standard model and set out in PPG paragraphs 18 (Reference ID: 2a-018-20190220) to 24 (Reference ID: 2a-024-20190220). The affordable housing need analysis helps to establish the overall scale of affordable housing need by location, type, size and tenure and whether the council should plan for more dwellings to help meet the need for affordable housing.
- C.2 PPG states that ‘all households whose needs are not met by the market can be considered in affordable housing need (PPG Paragraph: 018 Reference ID: 2a-018-20190220). PPG then considers how affordable housing need should be calculated:
- ‘Strategic policy-makers will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments).’* (PPG Paragraph: 019 Reference ID: 2a-019-20190220).
- C.3 The PPG focuses on the use of existing (secondary data) but does not preclude the use of primary survey evidence.
- C.4 There are four broad components to the needs assessment method. These have remained relatively unchanged through the different guidance issued by government and focus on:
- Step A. Existing households in need (current unmet gross need).
 - Step B. Future households in need.
 - Step C. Affordable supply.
 - Step D. Annual need for affordable housing.

Affordability assumptions

- C.5 As part of the affordable needs assessment, the extent to which households in need cannot afford open market prices or rents is considered. PPG does not specify what household income should be spent for a property to be affordable although does state the ‘need to identify the minimum household income required to access lower quartile (entry level) market housing’ PPG 2019 Paragraph 021 Reference ID 2a-021-20190220. The last guidance to consider affordable prices/rents was published in the 2007 DCLG Strategic Housing Market Assessments Practice Guidance Version 2 August 2007, which stated that gross household incomes should be used to assess affordability and:
- a household can be considered able to afford to buy a home if it costs 3.5x the gross income of a single earner or 2.9x the gross income for dual-income households; and
 - a household can be considered able to afford market renting where the rent payable was up to 25% of gross household income.

- C.6 The former guidance did note that local circumstances could justify higher figures being used for affordable renting and that allowances should be made for access to capital that could be used towards the cost of home ownership.
- C.7 Mortgage lending practices would suggest that 4.75x a single or joint income could be considered This is the maximum single or joint household income multiple offered by First Direct July 2020.
- C.8 Based on this data, the principle assumption considered by arc4 with reference to affordability is:
- for buying up to 3.5x gross household income; and
 - for renting up to 25% gross household income.

Step A: Current unmet gross need

- C.9 PPG Paragraph: 020 Reference ID: 2a-021-20190220 states that ‘strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:
- the number of homeless households;
 - the number of those in priority need who are currently housed in temporary accommodation;
 - the number of households in over-crowded housing;
 - the number of concealed households;
 - the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and
 - the number of households from other tenures in need and those that cannot afford their own homes, either to rent or to own if that is their aspiration.’
- C.10 PPG notes that care should be taken to avoid double-counting and to only include those households who cannot afford to access suitable housing in the market. Table C1. Sets out the overall scale of current need before affordability of market housing is considered.

Table C1 Current gross unmet need (before affordability testing)

Reason for need	Total in need	Comment	Source
A1 Homeless households	569	Number of households identified as homeless 2019/20	DLUHC Live tables
A2 Priority need / temporary accommodation	662	Households identified as threatened with homelessness in 2019/20 plus households living in temporary accommodation (based on quarterly average) in 2019/20	DLUHC Live tables
A3 Overcrowded	2,544	2011 Census data households	2011 Census LC4108EW
-	1,423		2021 household survey
A4 Concealed household	814	Census definition refers to couples and lone parents living within another family unit.	2011 Census LC1110EW
-	1,668	-	2021 household survey
A5 Existing affordable tenants in need	2,317	-	2021 household survey
A6 Other tenures in need	5,288	-	2021 household survey
A7 Sum of households in A3 to A6 with one or more needs	10,696	Sum of A3 to A6 BOLD figures	-
A8 Total in A7 adjusted to remove any double counting	10,246	This is the total number of households with one or more needs	-
A9. All households in need (A1+A2+A8) rounded	11,477	Represents 19.6% of all households.	-

Note table subject to rounding

Further Notes to Table C1:

A3. Overcrowding

The extent to which households are overcrowded is measured using the 'bedroom standard'. This allocates a standard number of bedrooms to each household in accordance with its age/sex/marital status composition. A separate bedroom is allocated to each married couple, any other person aged 21 or over, each pair of adolescents aged 10-20 of the same sex and each pair of children under 10. Any unpaired person aged 10-20 is paired if possible, with a child under 10 of the same sex, or, if that is not possible, is given a separate bedroom, as is any unpaired child under 10. This standard is then compared with the actual number of bedrooms (including bedsits) available for the sole use of the household.

A4. Concealed households

The number of couples and lone parents living within a household.

Note that the combined need from A3 and A4 is 3,358 using the 2011 Census and 3,091 using 2021 household survey evidence.

A5. Existing affordable tenants in need and A6. Other tenures in need

Households in need based on the numbers who have one or more of the following needs: under notice, real threat of notice or lease coming to an end; too expensive; too difficult to maintain; sharing facilities; unsuitable due to age/mobility impairment; lacking facilities; major disrepair; harassment/threat of harassment from neighbours.

A7 and A8. Sum of households

A7 is the sum of households who are overcrowded, concealed, are existing tenants in need or other tenures in need. A8 adjusts this total to remove double counting to give a figure for the total number of households with one or more housing need. This final figure takes account of any duplicates (so if the household is overcrowded and has another need, it is only counted once as a household in need).

Affordability of open market options

C.11 Table C2 sets out urban sub-area and parish lower quartile prices and rents.

Table C2 Lower quartile house prices and rents by sub-area/parish

Sub-area	Lower Quartile Price 2020	Lower Quartile private rent 2020
Central	£68,000	£477
East	£94,250	£481
North	£145,000	£550
West	£100,000	£494
Preston Rural East	£186,500	£550
Preston Rural North	£208,000	£793
City of Preston Total	£98,000	£494
Preston Rural East Parishes	Lower Quartile Price 2020	Lower Quartile private rent 2020
Broughton	£216,249	£722
Grimsargh	£177,000	£536
Haighton	£603,500	No data
Whittingham	£180,000	£537
Preston Rural North Parishes	Lower Quartile Price 2020	Lower Quartile private rent 2020
Barton	£187,000	£793
Goosnargh	£425,000	£748
Woodplumpton	£205,000	£793

Source: Data produced by Land Registry © Crown copyright 2020, Zoopla 2020

C.12 Table C3 sets out the proportion of households in need who could not afford open market prices or rents. Where no prices/rents are available, city-wide average

prices/rents have been used. The affordability analysis uses data on ward-level lower quartile prices and rents and assumes that a property is affordable if up to 25% of household income is spent on rent and buying costs up to 3.5x household income.

- C.13 It is reasonably assumed that all households in A1 (homeless) and A2 (priority need/in temporary accommodation) cannot afford open market prices or rents given their housing circumstances (and income information is not available from secondary data source).
- C.14 The affordability of open market options is tested on the remaining households in need (rows A3 to A6 in Table C1) based on 2021 household survey data.
- C.15 Analysis concludes that **6,707** households across the City of Preston are in housing need and cannot afford to buy or rent at lower quartile market prices.

Table C3 Affordability of open market housing for households in need

Needs groups	Number of households	% cannot afford to buy or rent	Number cannot afford to buy or rent
Sum of A1 and A2 households	1,231	100%	1,231
Sum of households in A3 to A6 with one or more needs	10,246	53.4%	5,476
Total cannot afford to buy or rent			6,747

Step B: Future households in need

- C.16 **PPG Paragraph 021 Reference ID: 2a-021029190220** states that ‘projections of affordable housing need will have to reflect new household formation, the proportion of newly-forming households unable to buy or rent in the market area, and an estimate of the number of existing households falling into need. The process will need to identify the minimum household income required to access lower quartile (entry level) market housing. It can then assess what proportion of newly-forming households will be unable to access market housing.’

New household formation

- C.17 The most useful data sources for assessing the level of new household formation are:
- DLUHC/ONS household projections, from which an annual net increase in households can be derived; and
 - the English Housing Survey, from which a national gross household formation rate can be derived and referenced as a data source in the PPG.
- C.18 Based on the requirements of PPG, the gross annual formation rate used in analysis is 859. This is the household formation rate derived from a range of projections set out in Table C4. Through the standard method of calculating need, allowance is made for increasing the level of housing delivery to support household formation through the affordability adjustment.

Table C4 Net and gross household formation 2021-2031

Scenario	Annual household formation	Notes	Source
A. DLUHC 2014-based household projections	231	2,309 NET increase between 2021 and 2031	DLUHC 2014-based household projections
B. ONS 2018-based household projections	172	1,715 NET increase between 2021 and 2031	ONS 2018-based household projections
C. Average gross household formation rate based on applying national rate to total households over the period 2021-2031 (2014-based projections)	868	Gross household formation rate of 1.435%	English Housing Survey 3- year average 2017/18 to 2019/20
D. Average gross household formation rate based on applying national rate to total households over the period 2021-2031 (2018-based projections)	850	Gross household formation rate of 1.439%	English Housing Survey 3 year average 2017/18 to 2019/20
E. Blended rate of gross household formation (C, D)	859	-	-

New households likely to be in affordable housing need

- C.19 Analysis of the incomes of households who have formed in the past 5 years using the 2021 household survey concludes that 34.1% could not afford buying or renting lower quartile (entry level) properties. Based on a gross formation rate of **859**, 293 households are estimated to be in affordable housing need.

Existing households expected to fall into need

- C.20 The 2021 household survey identifies 259 households who have fallen into need in the past 5 years and require affordable housing or 52 each year.

Total newly arising affordable housing need (gross per year)

- C.21 Total newly arising need is therefore 552 each year as summarised in Table C5.

Table C5 Total newly-arising affordable housing need

Households	Percentage	Number
A. Number of newly-forming households	-	859
B. Proportion unable to afford market housing	34.1%	293
C. Existing households falling into need	-	259
Total newly arising affordable need (B+C) each year	-	552

Step C: Affordable housing supply

C.22 PPG Paragraph 022 Reference ID: 2a-022-20190220 notes that ‘there will be a current supply of housing stock that can be used to accommodate households in affordable housing need as well as future supply. There are five aspects to affordable supply to be considered as set out in Table C6.

Table C6 Affordable housing supply

Source of supply/stock loss	Data source	Data
The number of affordable dwellings that are going to be vacated by occupiers that are fit for use by other households in need	RP lettings data over most recent 3-year period	Annual average of 622 general needs affordable dwellings have been let 2017/18 to 2019/20.
Suitable surplus stock (vacant properties)	DLUHC vacant dwelling statistics	201 vacant affordable (council and housing association excluding not available for letting) dwellings reported as vacant in 2020 or 1.97% of total affordable stock. This is below transactional rate of around 2% to allow movement in stock so no suitable surplus stock available
The committed supply of new net affordable homes at the point of assessment (number and size)	Council data	Total of 916 pipeline affordable dwellings. Assume all built over 5 years. Annual of 183 used in supply calculation as proxy for committed supply
Supply of affordable home ownership through <u>resale</u>	English Housing Survey Table FA4131	EHS indicates 5.9% of owner occupiers with a mortgage moved to their accommodation in the past year. This is used as a basis for estimating the number of resales of affordable home ownership products at 5% each year. Based on 241 dwellings there are an estimated 12 resales each year
Units taken out of management	Local authority data	None identified
Total annual supply	Calculation	622 lettings + 0 vacant + 183 newbuild +26 AHO resales – 0 units taken out of management = 831 each year

Note: stock losses through right to buy are not referenced in PPG and not included in this table. Any losses through right to buy would increase the shortfall.

- C.23 Overall, the model assumes a total annual affordable housing stock supply of **831** dwellings.

Step D: Total annual need and breakdown by size and tenure

- C.24 Table C7 summarises the total annual need for affordable housing across the City of Preston which establishes a gross annual need of 1,227 and after taking into account supply, a net need of 395 affordable dwellings each year assuming a clearance of gross unmet need over 10 years. Table C8 presents the data for wards and rural parishes.

Table C7 Gross and net annual affordable need

Model Stage	Factor	Number	Data source/assumption
A1	Current gross unmet need (before affordability test)	11,477	Table C1 row A9
A2	Current gross unmet need (after affordability test)	6,747	Table C3 Housing register – assumes all of this need should be met
A3	Annualised need	675	Assume unmet need is cleared over a 10-year period to reflect the standard method 10 year time period
B	Newly-arising annual need	552	Table C5
TGN	Total gross need	1,227	A3+B
C	Affordable annual housing supply	831	Table C6
-	Total annual net need	395	TGN – C

Notes: Table subject to rounding errors

Table C8 Gross and net annual affordable need by sub-area and parish

Factor	A1	A2	A3	B	TGN	C	-
-	Current gross unmet need (before affordability test)	Current gross unmet need (after affordability test)	Annualised need	Newly-arising annual need	Total gross need	Affordable annual housing supply	Total annual net need
Number	11,477	6,747	675	552	1,227	831	395
Sub-area	Table C1 row A9	Table C3	5 year clearance	Table C5	A3+B	Table C6	Total gross need - C
Central	5,227	2,926	293	133	426	250	176
East	1,220	1,125	112	242	354	328	27
North	2,569	1,252	125	43	168	65	104
West	1,885	1,086	109	96	205	180	24
Preston Rural East	310	202	20	24	44	5	39
Preston Rural North	266	156	16	14	30	3	27
Total	11,477	6,747	675	552	1,227	831	395
Factor	A1	A2	A3	B	TGN	C	-
-	Current gross unmet need (before affordability test)	Current gross unmet need (after affordability test)	Annualised need	Newly-arising annual need	Total gross need	Affordable annual housing supply	Total annual net need
Number	11,477	6,747	675	552	1,227	831	395
Rural East and Rural North Parishes	Table C1 row A9	Table C3	5 year clearance	Table C5	A3+B	Table C6	Total gross need - C
Barton	56	35	3	6	10	1	8
Broughton	91	56	6	6	12	1	11
Goosnargh	49	30	3	1	4	0	3
Grimsargh	106	66	7	7	13	1	12
Haighton	7	4	0	4	4	1	3
Whittingham	110	68	7	4	11	1	10
Woodplumpton	157	98	10	11	20	2	18
Total	576	357	36	38	74	8	65

Notes: Table subject to rounding errors

C.25 According to DLUHC statistics, there are 850 households on the housing register for the City of Preston. Table C9 summaries the number of bedrooms needed.

Table C9 Affordable need based on the Housing Register by number of bedrooms needed

Location	1	2	3	4 or more	Base
City of Preston	51.1%	31.7%	12.7%	4.5%	2,857

Source: DLUHC Local Authority Housing Statistics 2019/20

Note: Percentages use a base of 2,717 as for 140 applicants the number of bedrooms needed was unspecified.

Comparison of current housing stock and current/future needs

C.26 PPG states that 'strategic policy-making authorities will need to look at the current stock of houses of different sizes and assess whether these match current and future need (PPG Paragraph 023 Reference ID: 2a-023-20190220). Table C10 sets out this comparison and shows there is a particular shortfall of 2 and 4 or more bedroom affordable dwellings.

Table C10 Comparison between current supply and annual gross need

Number of bedrooms	Current supply %	Annual gross need %	Variance %
1-bedroom	29.9	25.3	-4.7
2-bedroom	35.5	47.2	11.7
3-bedroom	32.0	18.9	-13.1
4 or more-bedroom	2.5	8.6	6.1
Total	100.0	100.0	-

Source: 2020 SDR; 2021 household survey

Tenure mix and First Homes

C.27 Analysis needs to consider the range of affordable tenures as set out in Annex 2 of the NPPF that may be appropriate for existing households in need and newly-forming households.

C.28 For need arising from homeless households and those in temporary accommodation, it is assumed they all require social rented accommodation. For newly-forming households and existing households in need, a split between affordable rented and affordable home ownership should be considered. This is based on the tenure preference stated by existing households in need and newly-formed households. The household survey data has also been used to establish the proportions of households who could afford social rent, affordable rent and affordable home ownership options.

C.29 A minimum of 25% of all affordable housing units secured through developer contributions should be First Homes (**Paragraph 013 Reference ID: 70-013-20210425**). Then, PPG says 'once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the Local Plan. The remainder of the affordable housing tenures should be

delivered in line with the proportions set out in the Local Plan policy (**Paragraph 15 reference ID: 70-015-20210524**).

- C.30 Analysis has carefully considered the range of affordable tenures that may be appropriate for existing households in need and newly-forming households. Table C11 summarises the overall tenure split between affordable rented options (social and affordable rent) and affordable home ownership solutions (including shared ownership, discounted for sale and other tenures as set out in Annex 2 of the NPPF).

Table C11 Affordable tenure split recommendations by sub-area and parish

Sub-area	Social Rented (%)	Affordable Rented (%)	Affordable Home Ownership (%)
Central	46.0	39.7	14.3
East	46.8	40.4	12.8
North	44.2	38.1	17.6
West	49.7	42.9	7.4
Preston Rural East	50.7	43.7	5.5
Preston Rural North	49.3	42.5	8.2
City of Preston Total	47.1	40.6	12.4
Parish	Social Rented (%)	Affordable Rented (%)	Affordable Home Ownership (%)
Barton	49.1	42.4	8.5
Broughton	50.8	43.8	5.5
Goosnargh	49.4	42.6	8.1
Grimsargh	50.8	43.8	5.4
Haighton	50.4	43.4	6.2
Whittingham	51.0	44.0	5.0
Woodplumpton	49.2	42.4	8.4

Source: 2021 household survey

- C.31 Analysis would suggest an overall tenure split of 88% social/affordable rented and 12% affordable home ownership across the City of Preston.
- C.32 In terms of the split between social and affordable rented, the incomes of existing and newly-forming households have been considered against the costs of social and affordable renting. This results in a split of 65% social rented and 35% affordable rented.
- C.33 Table C12 sets out the steps to derive a final tenure split which takes into First Homes. The final affordable tenure split for the City of Preston is set out in Table C13.

Table C12 Detailed calculation of tenure split including First Homes

Step 1	Total affordable %	Overall affordable	100.0				
Step 2			Affordable tenure split				First Homes
	This splits the 100% into 75% affordable tenures and 25% First Homes	Affordable/First Homes Split	75.0				25.0
Step 3	Suggested policy breakdown		Social Rent	Affordable Rent	Affordable Home Ownership	AR + AHO	
	The current affordable policy is set out here. This is total split by SR, AR and AHO EXCLUDING FH		47.1	40.6	12.4	52.9	
	At this point, need to recognise that SR need and FH is ringfenced		RINGFENCED				RINGFENCED
	RINGFENCED % Split		47.1				25.0
Step 4	This step calculates how the AR and AHO units are apportioned.			21.4	6.5	27.9	
Step 5	Final affordable split is now set out		Social Rent	Affordable Rent	Affordable Home Ownership		First Homes
	Final position		47.1	21.4	6.5		25.0
	And then rounded to nearest whole number		Rounded %	47	21	7	

Table C13 Affordable tenure split for City of Preston

Social Rent	Affordable rent	Affordable home ownership	First Homes
47%	21%	7%	25%
Affordable rent total		Affordable home ownership total	
68% Rented options		32% Affordable Home Ownership options	

C.34 The final split of affordable tenures is 47% social rented, 21% affordable rented and 32% affordable home ownership (25% first homes and 7% other affordable home ownership options).

Affordable dwelling mix

C.35 The 2021 household survey has provided information on the number of bedrooms needed by households in affordable need and dwelling type aspirations and expectations. This is shown in Table C14. The actual annual need by tenure, bedroom size and dwelling type by sub-area and parish is shown in Table C15 to C17.

Table C14 Summary of affordable dwelling need by bedroom size and dwelling type by sub-area and parish: percentage of all affordable need

Sub-area	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom bungalow	2-bedroom bungalow	3 or more-bedroom bungalow	Total
Central	4.5%	14.4%	20.1%	21.3%	7.7%	16.3%	1.4%	8.6%	3.3%	2.4%	100.0%
East	0.6%	19.6%	26.2%	17.8%	9.6%	12.4%	0.0%	2.8%	2.4%	8.6%	100.0%
North	1.8%	12.7%	18.1%	12.2%	11.4%	5.0%	0.0%	10.2%	17.3%	11.4%	100.0%
West	0.0%	35.6%	28.7%	6.5%	9.6%	2.5%	0.0%	7.1%	5.8%	4.2%	100.0%
Preston Rural East	1.3%	4.8%	46.1%	14.3%	10.0%	2.2%	0.0%	7.3%	9.1%	5.0%	100.0%
Preston Rural North	2.6%	9.1%	23.8%	29.7%	10.6%	7.8%	0.0%	6.9%	8.5%	1.0%	100.0%
TOTAL	2.8%	14.3%	23.3%	17.6%	9.3%	10.3%	0.6%	8.3%	8.0%	5.4%	100.0%

Parish	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom bungalow	2-bedroom bungalow	3 or more-bedroom bungalow	Total
Barton	1.8%	7.6%	37.8%	32.7%	0.7%	4.8%	0.0%	1.7%	10.9%	2.0%	100.0%
Broughton	1.2%	10.1%	32.0%	23.3%	3.3%	8.6%	0.0%	0.0%	10.5%	11.1%	100.0%
Goosnargh	1.7%	13.6%	40.8%	13.9%	12.9%	7.7%	0.0%	0.0%	4.3%	5.2%	100.0%
Grimstargh	1.1%	7.2%	27.4%	25.7%	5.3%	2.8%	0.0%	4.0%	19.5%	7.2%	100.0%
Haighton	1.9%	7.5%	39.9%	31.8%	4.9%	3.5%	0.0%	0.0%	4.1%	6.3%	100.0%
Whittingham	0.8%	5.3%	24.8%	20.2%	10.9%	6.2%	0.0%	2.3%	14.5%	17.0%	100.0%
Woodplumpton	1.2%	6.0%	28.3%	32.4%	4.8%	14.5%	0.0%	0.0%	12.8%	0.0%	100.0%

Table C15 Summary of affordable dwelling need by bedroom size and dwelling type by sub-area and parish: social/affordable rented

Sub-area	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom bungalow	2-bedroom bungalow	3 or more-bedroom bungalow	Total
Central	7	14	21	16	13	24	2	15	4	3	118
East	0	5	5	1	1	3	0	1	1	1	18
North	2	12	10	2	12	4	0	11	12	3	68
West	0	7	3	0	2	1	0	2	1	0	17
Preston Rural East	1	0	14	1	4	1	0	3	2	1	26
Preston Rural North	1	2	4	5	3	1	0	2	1	0	19
TOTAL	10	40	57	26	35	34	2	33	20	9	266
Parish	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom bungalow	2-bedroom bungalow	3 or more-bedroom bungalow	Total
Barton	0	0	3	2	0	0	0	0	1	0	6
Broughton	0	1	3	1	0	1	0	0	1	1	8
Goosnargh	0	0	1	0	0	0	0	0	0	0	2
Grimsargh	0	0	2	2	1	0	0	0	2	1	9
Haighton	0	0	1	1	0	0	0	0	0	0	3
Whittingham	0	0	2	1	1	1	0	0	1	1	7
Woodplumpton	0	0	3	4	1	2	0	0	1	0	12

Table C16 Summary of affordable dwelling need by bedroom size and dwelling type by sub-area and parish: affordable home ownership

Sub-area	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom bungalow	2-bedroom bungalow	3 or more-bedroom bungalow	Total
Central	1	11	15	22	1	4	1	0	2	1	57
East	0	0	2	3	2	0	0	0	0	1	8
North	0	1	9	11	0	1	0	0	6	8	36
West	0	1	3	1	0	0	0	0	0	1	7
Preston Rural East	0	2	4	4	0	0	0	0	2	1	13
Preston Rural North	0	1	2	3	0	1	0	0	1	0	8
TOTAL	1	16	35	44	2	7	1	0	11	13	129
Parish	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom bungalow	2-bedroom bungalow	3 or more-bedroom bungalow	Total
Barton	0	0	1	1	0	0	0	0	0	0	3
Broughton	0	0	1	1	0	0	0	0	0	0	3
Goosnargh	0	0	0	0	0	0	0	0	0	0	1
Grimsargh	0	0	1	1	0	0	0	0	0	0	3
Haighton	0	0	0	0	0	0	0	0	0	0	1
Whittingham	0	0	1	1	0	0	0	0	0	0	3
Woodplumpton	0	1	1	2	0	1	0	0	1	0	5

Table C17 Summary of affordable dwelling need by bedroom size and dwelling type by sub-area and parish: all affordable

Sub-area	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom bungalow	2-bedroom bungalow	3 or more-bedroom bungalow	Total
Central	8	25	35	37	14	29	2	15	6	4	176
East	0	5	7	5	3	3	0	1	1	2	27
North	2	13	19	13	12	5	0	11	18	12	104
West	0	9	7	2	2	1	0	2	1	1	24
Preston Rural East	1	2	18	6	4	1	0	3	4	2	39
Preston Rural North	1	2	6	8	3	2	0	2	2	0	27
TOTAL	11	57	92	70	37	41	2	33	32	21	395
Parish	1-bedroom house	2-bedroom house	3-bedroom house	4 or more-bedroom house	1-bedroom flat	2-bedroom flat	3 or more-bedroom flat	1-bedroom bungalow	2-bedroom bungalow	3 or more-bedroom bungalow	Total
Barton	0	1	3	3	0	0	0	0	1	0	9
Broughton	0	1	3	2	0	1	0	0	1	1	11
Goosnargh	0	0	1	0	0	0	0	0	0	0	3
Grimsargh	0	1	3	3	1	0	0	0	2	1	12
Haighton	0	0	1	1	0	0	0	0	0	0	4
Whittingham	0	1	3	2	1	1	0	0	1	2	10
Woodplumpton	0	1	5	5	1	2	0	0	2	0	17

Technical Appendix D: Dwelling mix and modelling

Introduction

- D.1 This technical appendix describes the method used by arc4 to establish future dwelling type and size mix across the city. It presents the baseline data used as a starting point for the analysis and how data are interpreted to establish a reasonable view on dwelling type and mix.

Starting points

- D.2 There are four main data sources which underpin the analysis:
- household projections;
 - dwelling stock information;
 - data identifying the relationships between households and dwellings derived from the 2021 household survey; and
 - data derived from affordable housing need analysis.

Household projections

- D.3 These are used to establish the number of households by Household Reference Persons (HRP) and household type using the 2018-based data, and how this is expected to change over the period 2021 to 2038.
- D.4 The change in the number of households over this period can be established and, assuming that the dwelling needs of these households do not change significantly over the plan period, the potential impact on type and number of bedrooms of future dwellings can be determined.

Relationship between households and dwellings

- D.5 The relationship between the age of Household Reference Person, household type and dwellings occupied by type and size can be derived from the 2021 household survey.
- D.6 The data available is summarised in Table D1. For each age group, the proportion of Household Reference Persons (HRPs) by household type living in different type/size and size of dwelling has been estimated.
- D.7 The 2021 household survey also provides data on household aspirations and what households would expect to move to. This data can also be broken down by HRP age group and household type.
- D.8 By combining this range of data, it is possible to model the likely change in dwelling type/size requirements with reference to:
- the current relationship between HRP/household type and dwelling type/size and this remains constant over the plan period (demographic baseline);
 - household aspirations by HRP/household type (aspirations); and
 - what households would expect by HRP/household type (expect).

Table D1 Age groups, household type and dwelling types used

Age group of Household Reference Person	Household type	Dwelling type and number of bedrooms
15 to 24	One-person household	1-bedroom house
25 to 34	Household with 1 dependent child	2-bedroom house
35 to 44	Household with 2 dependent children	3-bedroom house
45 to 54	Household with 3 dependent children	4 or more-bedroom house
55 to 64	Other households with two or more adults	1-bedroom flat
65 to 74	All	2-bedroom flat
75 to 84	All	3 or more-bedroom flat
85+	All	1-bedroom bungalow
All	All	2-bedroom bungalow
All	All	3 or more-bedroom bungalow
All	All	All

Applying the data at authority level

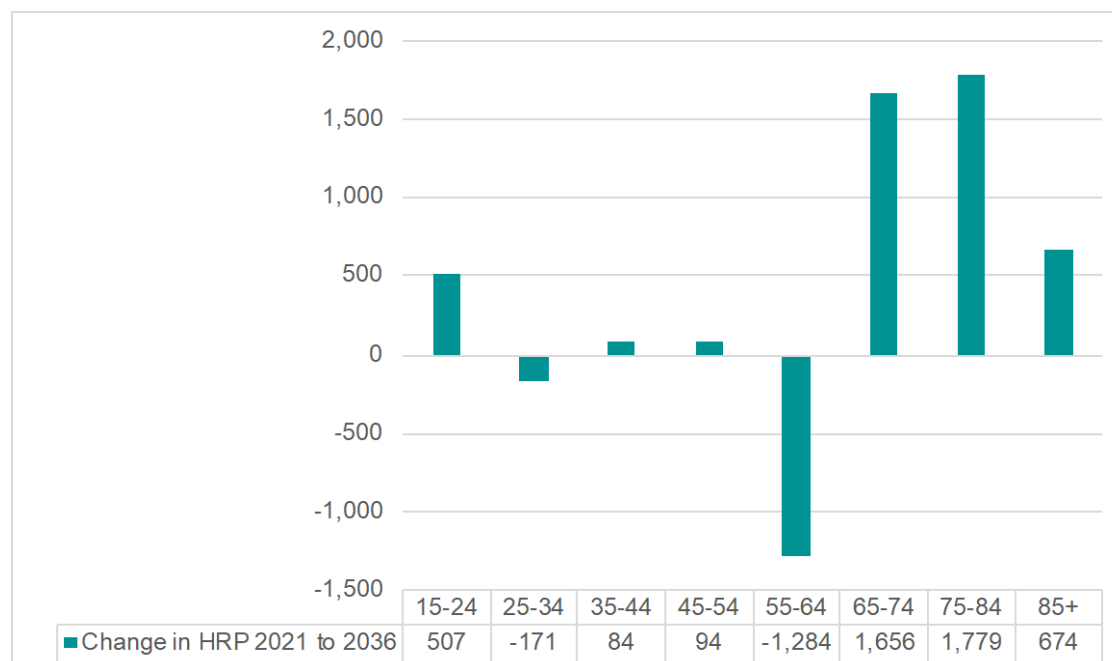
- D.9 Applying the data at authority level is done in a systematic way. Firstly, the change in the number of households by age group and household type is established from household projections. Assuming that the dwelling needs of these households do not change over the plan period, the overall impact on type/size of dwellings can be determined.
- D.10 Table D2 presents the baseline demographic data for the City of Preston. The total number of households is expected to increase by around 2,934 over the period 2021-2038 using 2018-based ONS household projections. Growth is mainly expected across older age cohorts, with absolute declines in HRP's aged 25-44 and 45-64. Figure D1 illustrates how the number of households by HRP age is expected to change over the plan period 2021-2038.

Table D2 Change in number of households by age group and household type 2021 to 2038

2021	One Person	Household with 1 dependent child	Household with 2 dependent children	Household with 3 or more dependent children	Other households with two or more adults	Total
15-24	1,292	611	234	112	967	3,215
25-34	3,251	1,833	1,295	888	2,444	9,711
35-44	3,403	1,928	1,973	1,252	1,678	10,235
45-54	3,700	1,827	1,402	565	3,508	11,002
55-64	3,800	854	359	98	5,176	10,287
65-74	3,046	186	28	10	3,841	7,111
75-84	2,416	60	5	4	2,496	4,981
85+	1,294	14	0	1	674	1,983
TOTAL	22,202	7,313	5,295	2,931	20,784	58,524
2038	One Person	Household with 1 dependent child	Household with 2 dependent children	Household with 3 or more dependent children	Other households with two or more adults	Total
15-24	1,496	710	272	131	1,114	3,722
25-34	3,214	1,789	1,263	861	2,413	9,540
35-44	3,443	1,914	1,996	1,262	1,703	10,318
45-54	3,702	1,858	1,464	590	3,482	11,096
55-64	3,309	737	307	81	4,569	9,003
65-74	3,734	226	34	12	4,761	8,767
75-84	3,243	82	7	6	3,423	6,760
85+	1,709	18	0	2	929	2,657
TOTAL	23,849	7,334	5,344	2,944	22,392	61,863
Change 2021-2038	One Person	Household with 1 dependent child	Household with 2 dependent children	Household with 3 or more dependent children	Other households with two or more adults	Total
15-24	204	99	38	18	147	507
25-34	-36	-45	-31	-27	-32	-171
35-44	40	-14	23	10	25	84
45-54	1	31	62	25	-26	94
55-64	-491	-117	-52	-17	-607	-1,284
65-74	688	40	6	2	920	1,656
75-84	827	22	2	1	927	1,779
85+	415	5	0	1	254	674
TOTAL	1,647	21	49	13	1,608	3,338

Source: ONS 2018-based household projections

Figure D1 Change in HRP age groups 2021-2038



Source: 2018-based ONS household projections

D.11 Table D3 applies household survey data on dwelling occupancy to the demographic profile in 2038. The two right hand columns indicate the likely change in demand for dwelling types and sizes and how this translates to an overall percentage dwelling requirement.

Table D3 Impact of change in households by age group of Household Reference Person (HRP) on dwellings occupied by 2038

Dwelling type and size	15-24	25-34	35-44	45-54	55-64	65-74	75-84	85+	TOTAL	%
1-bedroom bungalow/level access	4	2	36	122	70	270	36	16	596	1.0
1-bedroom flat	781	398	1,093	526	418	504	680	489	5,047	8.2
1-bedroom house	6	215	132	75	72	60	41	0	618	1.0
1-bedroom other	0	161	3	0	10	249	0	0	425	0.7
2-bedroom bungalow/level access	31	112	114	251	270	186	434	0	1,323	2.1
2-bedroom flat	790	787	893	610	295	589	544	92	4,717	7.6
2-bedroom house	628	3,134	1,744	1,529	1,029	1,059	434	478	10,087	16.3
2-bedroom other	9	21	13	29	6	53	423	0	551	0.9
3-bedroom house	356	3,742	3,690	4,710	3,515	3,171	2,631	1,007	22,771	36.8
3 or more-bedroom bungalow/level access	42	41	108	156	207	374	242	259	1,473	2.4
3 or more-bedroom flat	717	53	288	63	95	47	119	0	1,353	2.2
3 or more-bedroom other	22	9	11	0	18	6	58	18	137	0.2
4 or more-bedroom house	337	865	2,193	3,027	2,997	2,200	1,118	298	12,763	20.6
Total	3,722	9,540	10,318	11,096	9,003	8,767	6,760	2,657	61,862	100.0

Number of bedrooms	15-24	25-34	35-44	45-54	55-64	65-74	75-84	85+	TOTAL	%
1	791	777	1264	722	569	1082	757	505	6,467	10.5
2	1,458	4,053	2,764	2,418	1,601	1,888	1,835	570	16,587	26.8
3	1,136	3,845	4,097	4,928	3,835	3,598	3,050	1,283	25,774	41.7
4 or more	337	865	2193	3027	2997	2200	1118	298	13,034	21.1
Total	3,722	9,540	10,318	11,096	9,003	8,767	6,760	2,657	61,862	100.0

Note totals by age group may vary slightly due to rounding errors; Source: ONS 2018-based household projections and 2021 household survey

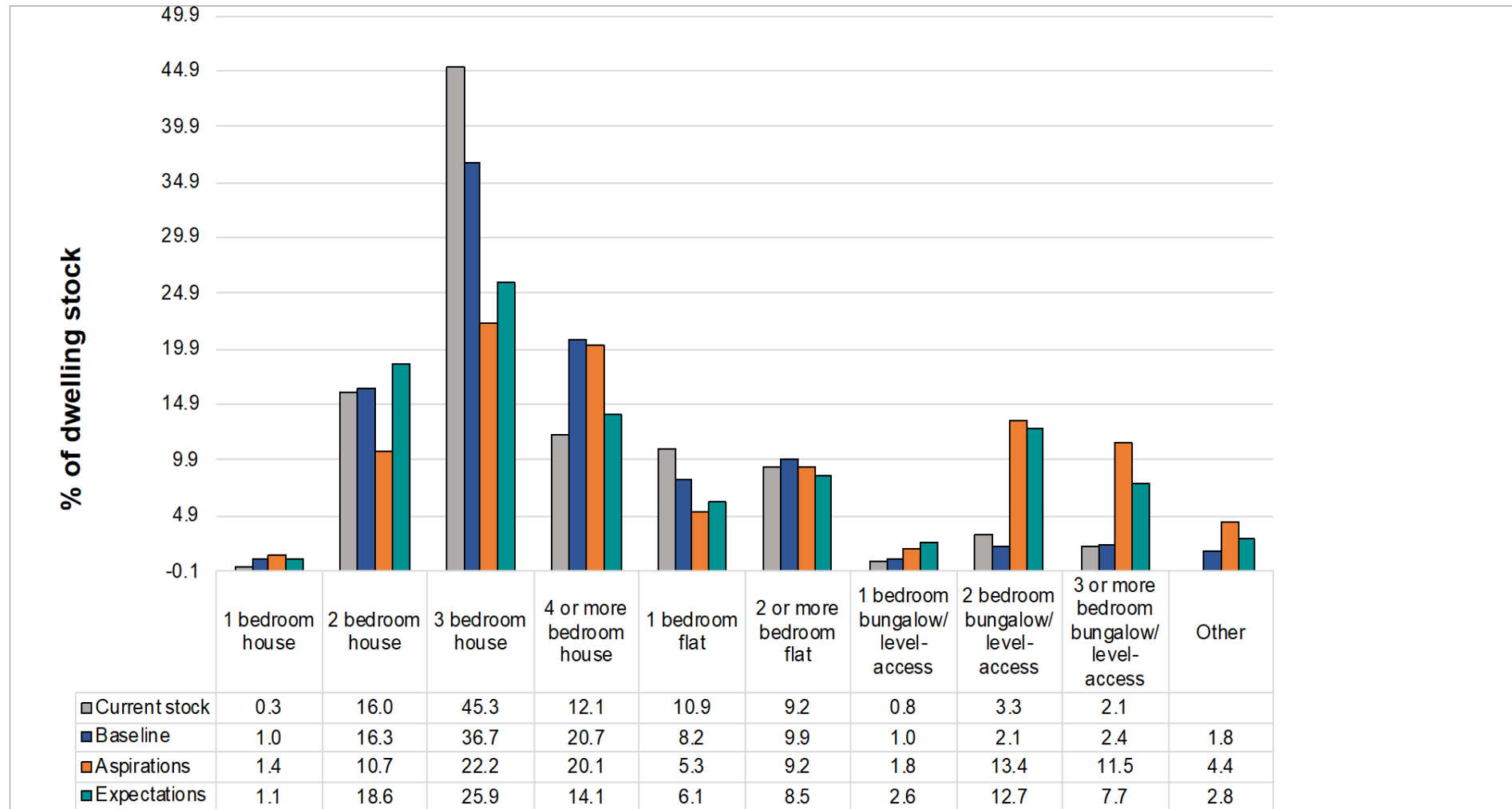
D.12 Table D4 sets out how the profile of dwelling stock changes when aspirations and expectations of households are considered. This indicates a shift towards bungalow/level-access accommodation and a need for two bedroom dwellings.

Table D4 Dwelling type and size outcomes under aspiration and expectation scenarios

Dwelling type and size	Demographic	Aspirations	Expectations
1 bedroom house	1.0%	1.4%	1.1%
2 bedroom house	16.3%	10.5%	18.4%
3 bedroom house	36.8%	22.1%	25.9%
4 or more bedroom house	20.6%	20.2%	14.1%
1 bedroom flat	8.2%	5.4%	6.1%
2 or more bedroom flat	9.8%	9.3%	8.6%
1 bedroom bungalow/level-access	1.0%	1.9%	2.5%
2 bedroom bungalow/level-access	2.1%	13.4%	12.7%
3 or more bedroom bungalow/level-access	2.4%	11.5%	7.7%
Other	1.8%	4.4%	2.8%
TOTAL	100.0%	100.0%	100.0%
Dwelling type	Demographic	Aspirations	Expectations
House	74.7%	54.3%	59.4%
Flat	18.0%	14.7%	14.8%
Bungalow/level access	5.5%	26.7%	22.9%
Other	1.8%	4.4%	2.8%
Total	100.0%	100.0%	100.0%
Number of bedrooms	Demographic	Aspirations	Expectations
1	11.0%	10.8%	11.2%
2	27.0%	33.9%	39.6%
3	41.4%	35.1%	35.2%
4	20.6%	20.2%	14.1%
Total	100.0%	100.0%	100.0%

D.13 Figure D2 summarises the dwelling profiles under the scenarios considered and compares this with current dwelling stock. Under the baseline demographic scenario, the majority of newbuild should be houses (particularly 3-bedroom) and some flats and bungalows/level-access accommodation. Under the aspirations and expectations scenarios, there is an increasing emphasis on bungalows/level-access.

Figure D2 Summary of dwelling types in current stock and under baseline demographic, aspiration and expectation scenarios



Source: 2021 household survey and 2018-based household projections

Overall dwelling mix by tenure

- D.14 Table D5 summarises dwelling type/size mix based on the demographic scenario. This analysis assumes an annual target of 257 dwellings based over the period 2021-2038, a minimum 30% affordable housing targets in urban areas and 35% in rural areas and an affordable tenure split of around 71% rented and 29% affordable home ownership. The analysis factors in the dwelling type/size analysis carried out as part of the affordable housing needs calculation and also the dwelling type/size choices of households considering affordable home ownership solutions based on the range of dwellings currently available.
- D.15 The analysis can be revised if annual targets and affordable housing delivery targets are updated.
- D.16 Data for sub-areas and parishes is presented in Chapter 6 of the main report.

Table D5 Summary of overall dwelling mix by tenure

Dwelling type/size	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1-bedroom house	0-2%	2-5%	0-2%	0-2%
2-bedroom house	10-15%	20-25%	10-15%	15-20%
3-bedroom house	35-40%	20-25%	25-30%	35-40%
4 or more-bedroom house	15-20%	5-10%	30-35%	20-25%
1-bedroom flat	0-2%	10-15%	2-5%	5-10%
2-bedroom flat	0-2%	15-20%	5-10%	5-10%
3 or more -bedroom flat	0-2%	0-2%	0-2%	2-5%
1-bedroom bungalow/level-access	2-5%	10-15%	0-2%	0-2%
2-bedroom bungalow/level-access	10-15%	5-10%	5-10%	2-5%
3 or more-bedroom bungalow/level-access	10-15%	2-5%	5-10%	0.2%
Dwelling type	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
House	70-75%	50-55%	75-80%	70-75%
Flat	2-5%	25-30%	5-10%	15-20%
Bungalow/level-access	25-30%	15-20%	10-15%	5-10%
Number of bedrooms	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1	5-10%	20-25%	2-5%	10-15%
2	25-30%	40-45%	25-30%	25-30%
3	50-55%	20-25%	35-40%	40-45%
4	15-20%	5-10%	30-35%	20-25%

Technical Appendix E: Stakeholder consultation responses and agent review

General stakeholder responses summary

- E.1 Stakeholders were invited to participate in a general questionnaire survey aimed at identifying a range of information, including establishing the key perceived housing market issues in Preston. Stakeholders were asked to respond to any of the questions within the survey that they felt related to their area of knowledge or experience and certain sections of the survey related to certain stakeholder groups. A total of five separate responses to the stakeholder consultation were obtained. Respondents were asked to answer only the questions that they felt were relevant to their knowledge and experience. This is a qualitative summary of the views expressed by stakeholders responding to the online survey and is split into the different stakeholder groups. 100% of stakeholders responding to the survey stated that they work within the Preston area.

Registered Providers

- E.2 Registered Providers were asked whether there were any shortfalls in supply in Preston. Registered Providers felt there was a shortage of 1 bed flats, bungalows and 2, 3 and 4 bed houses. It was also noted the need for adapted ground floor accommodation.
- E.3 Registered Providers were asked what could be done to improve the housing market in Preston, the following comments were received:
- Flexible approach to the delivery of affordable housing and prioritising affordable housing over other contributions and CIL where viability is an issue.
 - Requiring developers and house builders to partner with a Registered Provider so that the Registered Provider can influence the type of affordable housing that comes forward rather than what is most cost effective to provide.
 - More information and support provided to applicants regarding the private rented sector.
- E.4 The survey asked Registered Providers what should be considered when setting future housing standards, the following were mentioned:
- Housing standards become dated almost instantaneously. Flexibility allows developers and house builders to respond to market demand. House builders only want to build what is in demand and similarly Registered Providers only want affordable housing which they know there is demand for.
 - Lifetime homes standard.
 - More off road parking.
- E.5 Registered Providers were asked what the main concerns were regarding existing and future affordable and specialist housing and whether there is

enough, too much, is it of the right size, of a good quality and in the right place. The following comments were received:

- No one is building social rented houses.
- Limited availability of affordable bungalows.
- More Local Lettings Plans need to be introduced to address anti-social behaviour issues for new developments, particularly the larger sites.
- Sites where there is a balanced mix of flats and houses are needed.

E.6 Registered Providers were asked whether there is any demand for affordable housing products, such as shared ownership and discounted for sale. The following comments were made:

- There is demand for shared ownership and this will continue. Demand needs to be balanced against affordability considerations i.e. there may be demand for 4 bed shared ownership properties but these actually unaffordable for some people.
- Demand also leans towards larger properties in Preston with less demand for 2 bed properties.

E.7 The survey asked what needs to happen to improve the provision of affordable housing for rent and sale in Preston. Registered Providers confirmed that there needs to be more flexibility in the application of existing standards regarding the tenure of affordable housing. Also there is a need for more sites to deliver 100% affordable homes as opposed to acquisition via Section 106 agreements.

E.8 Registered Providers were asked whether they have any significant housing developments proposed in Preston, the following schemes were mentioned:

- Jigsaw - Tom Benson Way in Preston (89 units for affordable rent, mixed property types and 17 units for Shared Ownership)
- Jigsaw - Ingol Golf Club, Preston (10 units affordable rent and 4 for Shared Ownership).

Developers and Housebuilders

E.9 The survey asked Developers and Housebuilders to confirm what were the gaps in supply of housing in Preston. The comments received are detailed below:

- New developments to accommodate affordable mix tenure and open market housing 2/3 bed and possibly apartments.
- In terms of affordable housing, the 2017 SHMA found an annual net need of 239 affordable homes per annum in Preston between 2014 and 2034. Affordable delivery to date has resulted in a shortfall of some -507 affordable homes against this requirement. More recently, the 2020 Housing Study found a need for 250 net rented affordable homes per annum in Preston between 2018 and 2036. There is already a shortfall in the delivery of affordable housing of some -101 affordable homes against this identified need.

- E.10 The survey asked developers and housebuilders to confirm what the type and size of housing is in the greatest demand in Preston. The comments received are detailed below:
- 2/3 bed including apartments.
- E.11 Developers and housebuilders were asked what the main challenges were facing the delivery of new homes in Preston. The comments received are detailed below:
- Land costs.
 - Availability of suitable land.
 - Costly and time-consuming appeal led process to progress residential applications.
 - There is a need for an up-to-date Local Plan which will give confidence to both developers and the council.
- E.12 Developers and housebuilders were asked what could be done to improve the housing market in Preston, the following were suggested:
- Deliver sufficient choice across the housing market and the council needs to identify the widest possible range of sites, by size and market location so that house builders of all types and sizes have access to suitable land to offer the widest possible range of products.
 - Flexible approach and support toward greenfield planning applications and planning process.
 - Increasing the supply and pace of delivery of new homes will help to match supply with demand. SME housebuilders should be actively encouraged and supported to help contribute to the supply of new homes.
 - The planning and pre-development processes should be streamlined and made quicker.
 - Allocated sites should be prioritised for development.
 - Choice in the market and sufficient flexibility of allocations above minimum housing requirements in development plans are essential.
- E.13 The survey asked developers and housebuilders what should be considered when setting future housing standards, the following were mentioned:
- Increasing the costs of housebuilding will reduce viability for developers, particularly SME housebuilders. Purchasers are turning to SME's to provide something different than the 'cookie cutter' homes volume builders deliver and on smaller sites rather than huge sites with hundreds of similar product. Purchasers want something different so there needs to be acceptance of this within reason of course.
- E.14 Developers and housebuilders were asked who the typical customers for new homes in Preston were and whether they were first-time buyers, second stage movers, down sizers, locals, people moving out of neighbouring cities. All stakeholders felt that the customers were generally, second stage movers and first-time buyers which is mixed dependant on demographics.

- E.15 Developers and housebuilders were then asked whether these customers are looking for rent or sale. Stakeholders felt that in Preston it was mixed dependant on the housing needs - affordable rent or open market were equally in demand.
- E.16 Developers and housebuilders were asked whether there would be any demand for 'Build to Rent' products and all mentioned there is a demand in all areas for rent products, particularly affordable market rent.
- E.17 Stakeholders were asked if there is any demand for custom or self-build homes in the area. The following comments were mentioned:
- There is demand for custom or self-build homes in more rural locations which are likely to offer a highly attractive living environment within a self-contained community.
 - The development of self-build homes tends to be slow and uncertain and it should not therefore be relied upon as a potentially material source of new housing supply.
- E.18 In addition the developers and housebuilders who responded to the survey mentioned the following in terms of increasing the delivery of new homes in Preston:
- Bungalows are land hungry and ultimately can result in making the development financially non-viable. Also demand for bungalows are dependent on the area and housing needs, adapted etc
 - Full support from the council to move quickly on the planning application process and open to support greenfield site where applicable to meet demand.
 - The council should consider the inclusion of flexible policies in the forthcoming review of the Central Lancashire Local Plan. This would enable sustainable development to come forward outside of defined built up areas, in turn allowing the council to remedy potential short-term supply shortfalls without the need to depart from the provisions of the development plan.
 - There needs to be equitable application of planning gain within allocated masterplan areas such as NW Preston. Allocated sites should be supported and encouraged to deliver new dwellings as soon as possible. There needs to be a joined up approach between the City and the County Councils.
 - Choice in the market; sufficient flexibility in land allocated in development plans. A buffer is essential.
- E.19 Developers and housebuilders were asked whether they had any significant housing developments proposed in Preston, the following schemes were mentioned:
- Gladman - Land north of Whittingham Lane, Goosnargh (Preston), 145 dwellings including 35% affordable housing.
 - Gladman - Land east of Garstang Road, Broughton (Preston), 95 dwellings including 35% affordable housing.
 - Hollins Strategic Land and Hollins Homes are involved in a number of residential development proposals for a mix of dwelling sizes, types and tenures – Lower Bartle (up to 195 dwellings), Adlington (25 dwellings), and others currently promoting.

E.20 Developers and housebuilders were asked how housing can contribute to the mitigation of climate change and whether they were planning for the implementation of the Future Homes Standard. The following comments were provided:

- Green roofs, solar shading, treat wooden doors, frames, sills or switch to resilient ones. Green spaces, harvest rainwater, replace timber floors with concrete were mentioned.
- All the sites should include a comprehensive packages of site-wide green infrastructure. Well-designed open spaces are key in supporting an active lifestyle, by encouraging people to walk and cycle. It can also assist in terms of climate change resilience, through the provision of tree planting providing shading and CO2 absorption.
- A package of pedestrian and cycle infrastructure which will promote sustainable transport, including a suite of practical measures aimed at reducing the use of the private car should be included on schemes.
- Sites should deliver new bus stops and facilitate electric vehicle charging points, subject to further discussion with relevant stakeholders.
- The Future Homes Standard will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency; it will be introduced by 2025. Renewable energy technologies will be considered at the detailed design stage. Buildings and infrastructure will be designed and constructed to follow energy performance and efficiency targets, using a fabric-first approach to construction with the aim of reducing CO2 emissions.

Specialist Housing Providers

E.21 The Specialist Housing Providers were asked what gaps in supply there was in the City of Preston. Age Concern advised that there is a need for social rent, affordable rent, and specialist housing for older people in the area.

E.22 The Specialist Housing Providers were asked what can be done to improve the housing market. The following comments were provided:

- Look to develop brownfield sites first for housing.
- Use employment training initiatives to work on empty housing to be brought back into use as affordable homes.
- Focus on 1 and 2 bedroom housing.

E.23 The Specialist Housing Providers were asked what should be considered when setting future housing standards, such as accessibility, size and quality for new housing in the city. The following comments were provided:

- One/two bedroom properties for smaller family units and sole occupation.
- Consideration given to space for ease of movement for elderly and visually/physically impaired.

- Consideration given to fixtures/fittings for elderly and visually/physically impaired and Dementia sufferers (increasing Dementia numbers including early onset).
- E.24 The Specialist Housing Providers were asked for older person's needs, is there a desire to move to smaller specialist housing, but which is non care housing. Age Concern advised that specialist housing is required but it need to be appropriately designed around floor-space needs and fittings, with the ability to utilise VCFSE provided care if required.
- E.25 The Specialist Housing Providers were asked whether they had any information on the current supply of accommodation and/or support for these age-related needs groups. Age Concern advised they have data from field staff who say older people with support needs are poorly catered for.
- E.26 The Specialist Housing Providers were asked whether there was any evidence of specific age related accommodation and/or support needs. The following comment was received.
- E.27 Social Isolation is a large and currently growing referral condition to Social Providing Link Workers evidenced from their monthly returns. This applies across all age groups but is often the most common issue in those falling into 50+ ages. General support to tackle Social Isolation and loneliness would be welcome. However creation of multiple unit accommodation aimed specifically at single occupancy would bring people into a community and reduce Isolation.

Preston Local Authority staff

- E.28 Local Authority staff were asked if there were any gaps in the supply of types of housing in the City of Preston. It was advised that there is need for more social rented properties, particular for those households with a physical disability. There is also a need for more larger 4 and 5 bed houses as these are in short supply.
- E.29 Local Authority staff were asked what could be done to improve the housing market. The following comments were made:
- Make more government funding available for empty homes projects. The scheme in Preston has produced great results, but only on a small scale due to funding constraints. It is currently funded via s106 developer contributions in lieu of affordable homes, rather than any external funding, which limits what can be achieved.
 - Increase LHA levels which currently allow households access to a limited number of properties.
 - Remove the remaining restrictions on the shared room rate for the over 25s.
 - Introduce a form of government led bond for life scheme which would offer eligible applicants an insurance backed bond for private rented accommodation. The council only has access to limited funding to help private renters and the funding and guarantees required from agents and landlords to secure a lettings is becoming more onerous as demand increases.
 - Review the exempt accommodation Housing Benefit provision which provides high rental returns to investors under the angle of providing

supported accommodation to vulnerable persons. Ideally this exemption should be removed. In Preston large numbers of properties are being taken on for HMO use under the exemption. This is an investment trend seen around the country and neighbourhoods have experienced the detrimental impacts of concentrating large numbers of vulnerable persons in HMOs and or in a locality without the specialist support such schemes promise. This leads to high levels of anti-social behaviour, property damage and neighbourhood issues when tenants with complex needs are placed in settled neighbourhoods without the necessary support. A better approach would be for there to be more self-contained social rented and private accommodation for the public to access.

- Strengthen local authority obligations nationally to provide permanent and transit pitches for travellers.

E.30 Local authority staff were asked what the main challenges facing the local authority were in terms of supporting the delivery of new homes. It was advised that currently due to current staffing structures and resources the council provides an advisory role only in terms of housing delivery. Local authority staff felt that if there were more resources then the council would be able to take a more leading and influential role initiating and supporting new development across different land types and tenure. This could include being more proactive in identifying sites for development through CPO.

E.31 Local authority staff were asked what the main challenges were with existing housing stock. It was advised that there is a lack of appropriate investment by owner/occupiers and private landlords in the older terraced properties in St Matthews, Fishwick and Deepdale, which has resulted in a general decline in the standard of housing in those areas. This has led to increasing levels of dissatisfaction by the tenants and increasing burden on services such as Housing Standards in enforcement activities. The areas of existing stock are also ageing and are inherently not energy efficient. Large scale retrofit projects could help alleviate some of this, but the council has no capacity to bid for funds and manage retrofit on the scale required. This leads to higher levels of fuel poverty, ill health and carbon emissions, all of which are detrimental to the overall state of the existing stock in the city.

E.32 Local authority staff were asked how the challenges could be addressed. The following comments were received:

- Introduce a national licencing scheme for private landlords to improve standards of property management and inspections.
- Link the amount of Housing Benefit payable on a property to its condition. Currently the same rate is payable for a newly built property as one in need of modernisation and repair.
- Vary Housing Benefit payable as an incentive to invest in improving properties.

E.33 Local Authority staff were asked if there were any cross-boundary issues facing the City of Preston's housing market areas. It was advised that most inward and outward housing needs in regards to social housing is between Preston and South Ribble.

- E.34 Local authority staff were asked what the strengths and weakness of the City of Preston’s housing market was. The following comments were made:
- For Preston, strengths include a buoyant market for new build properties in the north of Preston, a good demand for new and resale discounted market properties, and high rates of application for new build social rented units.
 - The area is also attracting several new social landlords providing rented and shared ownership.
 - The private rented sector has a reasonable proportion of properties in the LHA range of rents although these are mostly concentrated in the inner city and central wards.
 - The condition of the “affordable” private rented properties is often fair to basic and increasing disrepair enquiries from tenants is an ongoing problem as no additional resource is available to proactively deal with these aspects.

Selling and lettings agents

- E.35 The following views were obtained through a review of the current rental and sales market via Right Move and Zoopla and telephone interviews in July 2021:

Ashton – On- Ribble

- E.36 House prices in Ashton-on-Ribble have seen a steady increase over the past 5 years with some properties increasing by £40k in value. In July 2021, there were 120 properties up for sale in Ashton-on-Ribble. There was a wide range of available properties for sale including 4 bed houses from £450k, 3 bed properties from £370k, 2 bed properties from £220k, 2 bed flats from £170k and 1 bed flats from £105k.
- E.37 In terms of properties to rent there were 21 in Ashton-on-Ribble. The properties for rent included 5 bed properties from £1,842pm, 4 bed properties from £1,473pm, 3 bed properties from £1,005pm, 2 bed properties from £675pm and 1 bed properties from £520pm.
- E.38 The majority of the agents who were advertising properties in this area were based in Preston Centre. There is one active agents in Ashton-on-Ribble: Tiger Sales & Lettings.
- E.39 After speaking to one of the neighbouring agents in Preston they confirmed that Ashton-on-Ribble is a popular area due to its location just outside Preston town centre and also due to the River Ribble and Preston Mariana/Riverway area which is an attractive residential development that attracts couples and young professionals. The area also has a wide range of large houses and terraced properties which is attractive to families in particular first-time buyers. Agents advised that the rental market is also very buoyant, but there is limited supply that isn’t meeting the demand particularly around the docklands.

Preston Centre

- E.40 In July 2021, there were 178 properties up for sale in Preston Centre. There was a wide range of available properties for sale including 4 bed houses from £350k, 3 bed properties from £240k, 2 bed properties from £200k, 2 bed flats from £189k and 1 bed flats from £145k.
- E.41 In terms of properties to rent there were 182 in Preston Centre. The properties for rent included 3 bed houses from £750pm, 2 bed houses from £550pm and 1 bed houses from £325pm. In terms of apartments there were a number of luxury city centre apartments available including 1 beds from £1,100pm and 2 beds were from £1,350pm.
- E.42 The majority of the agents who were advertising properties in this area were within the Preston Centre area. There are nine active agents in Preston Centre: Entwistle Green, Frank Harrington, Farrell Heyworth, Hazelwells, Jones Cameron, Marie Holmes, Michael Bailey, Reeds Rains and Roberts & Co.
- E.43 After speaking to two of the agents they confirmed that Preston Centre is a very popular area which has increased in popularity over the past few years due to a number of new build luxury apartment developments for private rent which has attracted young professionals and couples to the area. Preston Centre is an area with high value properties to rent as well as some low cost rental properties above shops. Preston Centre is also the area where the majority of the student accommodation is located and there is a strong and vibrant student community located within the centre even during the pandemic. Agents felt that the purpose build student accommodation complemented the other developments comprising of luxury apartments as well as apartments for shared ownership, thus creating mixed communities in the area.

Fulwood

- E.44 House prices in Fulwood have seen a steady increase over the past 5 years with some properties increasing by £75k in value. In July 2021, there were 196 properties up for sale in Fulwood. There was a wide range of available properties for sale including 6 bed detached properties from £1.1m, 5 bed detached properties starting from £1.3m, 4 bed houses from £550k, 3 bed properties from £240k, 2 bed properties from £200k, 2 bed flats from £170k and 1 bed flats from £120k.
- E.45 In terms of properties to rent there were 31 in Fulwood. The properties for rent included 3 bed houses from £700pm, 2 bed houses from £575pm and 1 bed houses from £325pm. In terms of apartments, 1 beds were from £520pm and 2 beds were from £650pm.
- E.46 The majority of the agents who were advertising properties in this area were within the area of Fulwood and Preston Centre. There are five active agents in Fulwood: Dewhurst Homes, Easthams and Co, Entwistle Green, Farrell Heyworth and Kingsworth.
- E.47 After speaking to two of the agents they confirmed that Fulwood is a very popular area which has increased in popularity over the past few years due to a number of new build developments of high value large family 4 and 5 bed houses. Fulwood is an area with high value large properties and also affordable smaller properties so has something on offer for most. Fulwood is also an attractive area

due to being the greenest area in Preston and lots of households have recently moved to this area due to its semi-rural location and no longer needing to living in the city centre due to Covid-19 and homeworking. In addition it is the location of the Royal Preston Hospital so it popular for those that work at the hospital both in terms of sales and renting.

Longridge

- E.48 House prices in Longridge has seen a steady increased over the past 5 years, with some properties seeing a £50k increase during this time. In July 2021, there were 86 properties up for sale in the area. There was a wide range of available properties for sale including 6 bed property for £450k, 5 bed for £430k, 4 bed houses from £400k, 3 bed properties from £345k, 2 bed properties from £220k and 1 bed properties from £115k.
- E.49 In terms of properties to rent there were 2 in Longridge, 1x 2 bed bungalow for £1,100 and 1 studio flat for £433pm.
- E.50 The majority of the agents who were advertising properties in this area were based in Longridge, Preston or Fulwood. There are two active agents in Longridge: Dewhurst Homes and Go Estate Agency.
- E.51 After speaking to the one of the agents they confirmed that Longridge is a very popular and affordable area of Preston. The area has also seen a number of new build developments by Taylor Wimpey, Barratt Homes and David Wilson Homes offering large family 3, 4 and 5 bed homes for sale on semi-rural locations. These new developments have attracted both existing and new households to the area and particularly during the pandemic when households wanted more space for a home office and extended garden space. Agents also advised that there have been a number of new build shared ownership houses and bungalows built by Together Homes in the area which have been extremely popular, which shows that there is a further need for affordable homes in the area. Agents confirmed that the rental market is also popular, however there is a shortage of properties which is pushing the rental prices up in the area.

Summary

- E.52 From all of the challenges facing the Preston housing market, stakeholders were asked what the key priorities are for themselves or their organisation. The key priorities identified for are detailed below:
- Build more homes that meet with the demand and types of houses required.
 - Increase development opportunities with a good mixture of property types, LLPs agreed for larger developments to try to create a more balanced and sustainable community.
 - It is crucial that the council and developers work in a collaborative manner to bring forward suitable housing sites in sustainable locations across the local authority areas.

- The council should respond to the clear need for further market and affordable housing by ensuring an appropriate level of new growth is planned for in emerging Local Plan(s).
- Achieve viable and marketable planning permissions on suitable and sustainable sites in a timely fashion; to build high quality new homes; to create jobs and to grow sustainable businesses and communities.
- Offer products that is not just the same as volume builders, something different and unique, giving consumers more choice.
- Choice in the market; sufficient flexibility in land allocated in development plans. A buffer is essential.
- Work across communities to help anyone suffering from Dementia (including early onset), those who need community links to improve their living well capability and to ensure everyone ages well to live well. This includes support within the home.
- Focus more on carers, looking after their needs. If carers needs are better understood and supported by them being in a better place this will also be reflected in improved care delivery to those who need it. Carer respite and the provision of short or medium term accommodation for those with health related needs to enable respite for the carer is urgently needed.
- Prevent homelessness which would be more achievable if there was an improved supply of affordable private rented and social rented property.
- Reduce the incidences of rough sleeping by supporting service users into accommodation and working with a range of agencies e.g. health, voluntary sector, substance misuse to maintain housing.
- Maintaining, if not expanding, the housing regulatory function to try and address the worsening conditions found in the existing private sector stock, plus raising the profile of climate change and the retrofit agenda to try and draw additional resource into that area.

APPENDIX 9:

Central Lancashire Housing Study (DLP / Edge Analytics) (2022)



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
Chorley Council, Preston City Council and South Ribble Borough Council

Central Lancashire Housing Study

**Prepared by
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With Edge Analytics

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0.0 EXECUTIVE SUMMARY

- 0.1 This Housing Study identifies the level and proportional split of future housing needs across the three Central Lancashire (Chorley, Preston and South Ribble) for the period 2023 to 2038, comprising the sum of individual figures for the constituent local planning authorities.
- 0.2 The outputs and recommendations in this report should be considered by the Central Lancashire authorities in setting out housing requirement and distribution policy options in the Central Lancashire Local Plan.
- 0.3 Separate Housing Need and Demand Assessment reports have also been prepared by arc4 for each of the three Central Lancashire authorities. The arc4 reports identify affordable housing needs, housing mix and housing needs of different groups across Central Lancashire.
- 0.4 The Housing Study has been prepared in accordance with the National Planning Policy Framework (NPPF, 2021) and relevant Planning Practice Guidance (PPG), which sets out how strategic policy-making authorities should calculate the minimum number of homes needed in an area over the plan period.
- 0.5 The starting point for the assessment of housing need is the calculation of local housing need (LHN) using the Standard Method alongside an assessment of other relevant evidence, including future prospects for jobs growth.
- a) Defining the Housing Market Area (HMA)**
- 0.6 Within the PPG, housing market areas are defined as *“a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work”* (Ref. 61-018-20190315).
- 0.7 The review of evidence presented in this report confirms that Central Lancashire should be defined as a self-contained HMA.
- 0.8 This conclusion is consistent with the outcomes of previous work but has been prepared with reference to more recent data and considered against the current criteria outlined within the Planning Practice Guidance.
- b) Local Housing Need**
- 0.9 The starting point in assessing housing needs is the Government’s Standard Method, used to calculate a minimum annual Local Housing Need (LHN) figure for an area. The Standard Method results in a minimum LHN figure of **988 dwellings per annum** for Central Lancashire, which comprises figures of 542 for Chorley, 265 for Preston and 181 for South Ribble.
- c) Growth Scenarios**
- 0.10 It is important to consider the LHN figures within the wider demographic context to establish whether the LHN is an appropriate housing need figure for Central Lancashire. Edge Analytics has used POPGROUP (PG) technology to develop 13 demographic scenarios for each of the Central Lancashire authorities.
- 0.11 The benchmark scenario is the **Dwelling-led LHN** scenario, linked to the housing need figures derived using the government’s Standard Method.
- 0.12 The **SNPP-2014** scenario replicates the 2014-based projections, whilst the **SNPP-2018** scenario (and associated variants), replicates the 2018-based population projections. These scenarios have 2014 and 2018 base years respectively.
- 0.13 Three trend-based scenarios have also been developed, using alternative migration histories

from which to calibrate future growth assumptions. These 'PG' trend scenarios are based on a continuation of **short- (5-year)**, **medium- (10-year)** and **long-term (19-year)** migration histories and all incorporate a 2020 MYE base year. In these scenarios, fertility and mortality assumptions are drawn from the latest 2018-based ONS projection.

- 0.14 A final set of '**employment-led**' scenarios have also been developed, underpinned by the employment forecasts from Cambridge Econometrics (CE). These scenarios respond to the requirement to provide an assessment of market signals as part of exploring any different method to the Standard Method calculation.
- 0.15 Two 'commuting sensitivity' scenarios evaluate the impact of alternative commuting ratios on the growth outcomes of the Employment-led scenario. The first sensitivity scenario (**CR 2020**) utilises updated 2020-based commuting ratios. In the second sensitivity scenario, the 2020 commuting ratios have been adjusted in each year of the forecast on the assumption that future jobs growth is met on the basis of a **1:1 commuting ratio** (i.e., for every new job created in a district there is a worker available to fill it).
- 0.16 In the following table, each of the scenarios is summarised in terms of population and household growth for the 2023–2038 plan period, alongside the average annual net migration, and associated dwelling and employment growth outcomes. The benchmark LHN scenario is highlighted in grey.

Central Lancashire - Scenario outcomes, 2023–2038

Scenario	Change 2023–2038				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Employment	Dwellings
Employment-led CE (CR Census)	31,343	8.2%	19,647	12.0%	1,862	1,070	1,364
Employment-led CE (CR 2020)	30,879	8.1%	19,460	11.9%	1,835	1,070	1,351
Employment-led CE (CR 2020 1-to-1)	30,303	8.0%	19,208	11.8%	1,789	1,070	1,334
SNPP-2018-HIGH	26,455	7.0%	17,201	10.6%	1,525	980	1,195
PG-5Y	22,019	5.8%	15,848	9.7%	1,288	764	1,102
PG-Long-Term	19,140	5.0%	14,670	9.0%	1,093	776	1,020
Dwelling-led LHN	18,524	4.9%	14,226	8.8%	1,125	573	988
SNPP-2018	18,521	4.9%	13,935	8.6%	1,097	632	968
PG-10Y	17,146	4.5%	13,601	8.4%	1,031	586	945
SNPP-2014	14,935	4.0%	11,766	7.3%	370	245	817
SNPP-2018-ALTERNATIVE	11,587	3.1%	11,367	7.0%	746	362	789
SNPP-2018-LOW	10,582	2.8%	10,666	6.6%	668	283	741
SNPP-2018-10YR	7,515	2.0%	9,550	5.9%	503	244	663

- 0.17 Starting with the dwelling-led LHN and taking into account future employment growth results

in a scenario range of between 1,334 and 1,364 dwellings per annum. At 1,334 per year, the dwelling growth outcome resulting from the **Employment-led CE (CR 2020 1-to-1)** scenario is higher than the LHN but supports the projected levels of employment growth seen under the CE forecast.

d) Justification for Alternative Approaches to Assessing Housing Need

- 0.18 PPG identifies circumstances in which it may be appropriate to consider whether actual housing need is higher than the Standard Method. This includes circumstances where increases in housing need are likely to exceed past trends because of:
- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);
 - strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
 - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;
- 0.19 The PPG recognises that the Standard Method is sensitive to changes in the rate of housing delivery, stating that there may occasionally be situations where previous levels of housing delivery in an area are significantly greater than the outcome from the Standard Method. Calculation of the Standard Method also does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour (Reference ID: 2a-010-20201216). The Study utilises the PPG to inform an assessment of alternatives to the Standard Method.
- 0.20 The PPG specifies that these factors need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). For Joint Plan-making the PPG further specifies it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area (ID: 2a-013-20201216).
- 0.21 For the purposes of this Housing Study exceptional circumstances have not been identified that would support the exploration of any scenario that would result in a lower figure than the result of the Standard Method. Realistic assumptions for demographic growth, and resultant trends in household formation and composition considered in accordance with the 2014-based household projections, strongly indicate projected change greater than that provided by the starting point for the Standard Method calculation.
- 0.22 The following housing need scenarios were identified as reasonable alternative policy options:
- Standard Method (LHN) Baseline
 - POPGROUP 5-Year
 - POPGROUP Long-Term
 - Employment-led Projection (2020 Commuting Ratios held constant)
 - Employment-led Projection (1:1 commuting for new jobs)
- 0.23 These scenarios were individually assessed, following which the housing need scenario that is the recommended or preferred option is the **Employment-led CE (CR 2020 1-to-1) projection**. The justification for this is set out below.
- 0.24 At a total of 1,334 dpa, the housing need presented in this scenario is higher than the LHN baseline scenario of 988 dpa but is better aligned with the past completion trends and forecast levels of employment growth, and as such accords with appropriate circumstances

set out in PPG for justifying an alternative assessment of housing need that exceeds the result of the Standard Method.

- 0.25 All of the alternative scenarios considered reasonable for further exploration satisfy this criterion in terms of producing annual dwellings figures exceeding the total result of the Standard Method calculation for the Central Lancashire authorities. This supports exploring the proportional split of each scenario by authority. This reflects the extent to which applying alternative realistic assumptions for demographic growth affect the constituent Central Lancashire authorities differently and in effect generate a different 'distribution' of housing need based on the sum of the individual totals.
- 0.26 Whilst the overall need identified under this scenario is slightly lower than recent dwelling completion rates, it more closely aligns with average recent completions figures than any of the other tested scenarios. It also closely aligns with the existing Core Strategy requirement for each authority that was previously tested and found sound at examination, as well as the forecast average annual total deliverable supply across the three authorities of 1,614 dwellings per annum over the next five years (as at 31st March 2021).
- 0.27 A number of assumptions and adjustments have been applied in order to derive the housing need figures set out in this scenario. Most notably, this scenario assumes that future jobs growth is provided for under a **1:1 commuting ratio** i.e., for every new job created in a district there is a worker available to fill it. In practice, this assumes that each Central Lancashire authority provides sufficient growth in the resident labour force (adjusted for unemployment rates) so an increase in the number of jobs is matched on a 1:1 basis by the increase in resident workers in each constituent area.
- 0.28 This is considered more consistent with the PPG and the underlying objectives of the calculation of the Standard Method, which includes in the justification for its affordability adjustment increasing opportunities for people to live near where they work (Ref. 2a-006-20190220).
- 0.29 The NPPF also states that plans should *"provide a positive vision for the future of each area"* (paragraph 15) and should *"be prepared positively, in a way that is aspirational but deliverable"* (paragraph 16) and should make sufficient provision for both housing (including affordable housing) and employment (paragraph 20(a)).
- 0.30 This scenario therefore assumes no change in absolute levels of in-commuting or out-commuting alongside meeting the forecast additional jobs growth (which otherwise occurs when commuting ratios are held constant). This scenario reduces net additional in-commuting to Preston and net out-commuting from Chorley, leading to a change in the relative proportions of housing need at least partly attributable to previous trends in housing delivery between the Central Lancashire authorities (i.e., out-commuting from Chorley has increased since 2011 due to fewer new homes provided close to employment growth elsewhere in Central Lancashire). South Ribble does not experience any increase in in-commuting to meet baseline employment growth, which necessitates a significant uplift on previous delivery levels. The 1:1 commuting ratio adjustments that have been applied to this scenario are considered to be preferable to the employment-led projection that uses the 2020 commuting ratio.
- 0.31 The following table provides a breakdown of what this scenario means for each authority in terms of assumed population change, household change, net migration, employment and dwellings equivalent.

Employment-Led Housing Need Scenario Summary

Area	Change 2023 - 2038				Average per year		
	Population Change	Population Change%	Households Change	Households Change%	Net Migration	Dwellings	Employment
Central Lancashire	30,303	8.0%	19,208	11.8%	1,789	1,334	1,070
Chorley	9,508	7.8%	6,168	11.7%	866	428	328
Preston	10,263	7.0%	7,013	11.4%	160	490	378
South Ribble	10,531	9.3%	6,028	12.2%	763	416	363

e) Next Steps

- 0.32 The recommended housing need scenario set out in the above table (Employment-led CE (CR 2020 1-to-1) projection) provides a total housing need figure for the whole Central Lancashire Local Plan area (i.e. 1,334 dpa), which is the sum of individual housing need figures for the constituent local planning authorities. In accordance with PPG (ref. 2a-013-20201216) once this housing need figure has been agreed it will then be for the Central Lancashire authorities to determine how much of the overall need can be accommodated within Central Lancashire, and whether each district can accommodate its own need in full, before determining the housing requirement(s) for the plan area and each individual authority area.
- 0.33 It is recommended that an assessment of the size, type, and tenure of housing needed for different groups in Central Lancashire is considered as part of this process and used to inform policy-based decisions about the amount of housing to be planned for in each district.
- 0.34 The final housing requirement or requirements set in the Joint Local Plan may be different to the relative proportions within the recommended dwelling need scenario, depending on the Councils' further assessment of policy-on and plan-making considerations.
- 0.35 The findings and recommendations of this Housing Study can therefore be used to inform the preparation of planning policies including through exploring and identifying options for addressing housing need across the three authorities, and then setting out a preferred approach.

1.0 INTRODUCTION

a) Background

- 1.1 DLP Planning and Edge Analytics were appointed by the Central Lancashire Authorities (Chorley Council, Preston City Council and South Ribble Borough Council) to undertake a Housing Study for the area. The objective of the study is to identify the level and proportional distribution of future housing needs across Central Lancashire for the period 2023 to 2038. This Housing Study will provide a robust and up to date evidence base to inform the emerging Central Lancashire Local Plan.
- 1.2 This planned approach to meeting future housing needs will ensure communities in Central Lancashire have access to the right type of housing. The housing scenarios in this study have considered local needs and growth requirements, including taking account of future prospects for jobs growth.

b) National Policy Context

- 1.3 Paragraph 20 of the National Planning Policy Framework (NPPF2021) identifies that making sufficient provision for housing (including affordable housing) should be set out in strategic policies providing for the overall strategy in terms of the scale, pattern, and quality of development.
- 1.4 Planning Practice Guidance (PPG)¹ assists in terms of the evidence-gathering requirements for plan-making to build up a clear understanding of housing needs in the area. In summary, this approach encompasses:
- Definition of the Housing Market Area (HMA) most appropriate for the preparation of planning policies;
 - Establishing the overall housing need; and
 - Identifying the housing needs of different groups
- 1.5 These steps are reflected in paragraphs 61 and 62 of the NPPF2021, which set out how the minimum number of homes needed should be determined and how needs that cannot be met within neighbouring areas should be planned for, in preparing evidence to satisfy the Government's objective of boosting the supply of housing. This evidence should be used by strategic policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (NPPF2021, paragraph 66).
- 1.6 Paragraph 62 (NPPF2021) states that the housing needs of different groups should be set out in terms of the size, type and tenure of housing needed the context of the figure for local housing need.
- 1.7 Paragraph 66 (NPPF2021) also sets out that within the overall requirement relevant strategic policies should provide for the identification of a housing requirement for designated neighbourhood areas that reflects the overall strategy for the pattern and scale of development and any relevant allocations.

c) Study Scope and Structure

- 1.8 This report addresses the first two bullet points summarised above, relating to definition of the HMA and the objective assessment of housing need, comprising the sum of individual figures for the constituent local planning authorities and utilising the starting point provided by calculation of local housing need using the Standard Method alongside an assessment of

¹ PPG ID: 61-039-20190315

other relevant evidence.

- 1.9 The findings and recommendations of this Housing Study report can therefore be used to inform the preparation of planning policies including through exploring and identifying options for addressing housing need across the three authorities.
- 1.10 The outputs and recommendations in this report should be considered by the Central Lancashire authorities in setting out housing requirement and distribution policy options when preparing the Central Lancashire Local Plan. The approach to preparing this Housing Study considers previous evidence and the outcome of earlier plan-making stages (including relevant consultation responses) to ensure that the most recent understanding of issues is fully considered.
- 1.11 Separate Housing Need and Demand Assessment reports have also been prepared by arc4 for each of the three Central Lancashire authorities. The arc4 reports identify affordable housing needs, housing mix and housing needs of different groups across Central Lancashire within the context of the overall objectively assessed needs for housing considered within this Housing Study.
- 1.12 The structure of this Central Lancashire Housing Study is as follows:
 - **Section 2 – Context and Background to this Housing Study**

This section considers the relevant background to plan-making and existing evidence relating to the assessment of housing need and potential distribution options in Central Lancashire. This includes a review of the evidence base prepared for the Central Lancashire Councils that informed consultation on Issues and Options for the emerging Central Lancashire Local Plan in late 2019 / early 2020.
 - **Section 3 – Definition of the Housing Market Area**

This section clarifies the geographical extent of Central Lancashire’s housing market, drawing upon the findings of the 2017 SHMA and 2019 Housing Needs Study (updated March 2020), and having regard work carried out by neighbouring Local Authorities.
 - **Section 4 – Demographic Profile**

This section provides an overview of the current demographic profile of the constituent Central Lancashire Authorities and the plan area as a whole, including reflecting recent trends in components of population change. This section also compares differences in the official subnational population and household projections for the Central Lancashire Authorities, and the extent to which the 2014-based projections used as an input to the Standard Method reflect recent evidence.
 - **Section 5 – Local Housing Need**

This section undertakes the quantitative calculation of local housing need in accordance with the Standard Method in national planning practice guidance, indicating the minimum figure that should be planned for. This section also summarises qualitative evidence of housing needs as derived from engagement with stakeholders including that relating to the operation of the Standard Method in Central Lancashire.
 - **Section 6 – Growth Scenarios**

This section uses the analysis in preceding chapters to define and undertake scenario testing of alternative approaches for the assessment of local housing need in order to determine whether these are appropriate for the circumstances in the Central Lancashire. These scenarios also summarise the relationship between forecast economic and employment growth in terms of reflecting requirement for labour supply and demand as part of the local housing need assessment.

- **Section 7 – Justification for Alternative Approaches to Assessing Housing Need in Central Lancashire**

This section sets out the justification for applying alternative approaches for assessing housing need in Central Lancashire. This is explored in the context of national policy and guidance for the joint plan-making² together with setting out the circumstances for considering alternative approaches where it may be appropriate to plan for a higher housing need figure than the Standard Method indicates³. This section also provides consideration of whether there is an additional need identified through the requirements set out as part of City Deal for Preston and South Ribble, noting that this need is aspirational and tied to the delivery of key infrastructure across those areas in order for development to be realised.

- **Section 8 – Next Steps**

This section sets out recommended next steps and further work that may be required to inform the preparation of planning policies including exploring and identifying options for addressing housing need across the three authorities, and then setting out a preferred approach⁴.

² PPG ID: 2a-013-20201216

³ PPG ID: 2a-010-20201216

⁴ PPG ID: 61-034-20190315

2.0 CONTEXT AND BACKGROUND TO THIS HOUSING STUDY

2.1 This section considers the relevant background to plan-making and existing evidence relating to the assessment of housing need and potential distribution options in Central Lancashire. This includes a review of the evidence base prepared for the Central Lancashire Councils that informed consultation on Issues and Options for the emerging Central Lancashire Local Plan in late 2019 / early 2020.

a) Plan-Making Context – An Introduction

2.2 The three Councils of Preston, South Ribble and Chorley have reached a consensus that the Joint Core Strategy (JCS) (adopted July 2012) and the individual Local Plans it supports require a review of the policies and each local planning authority has taken a formal decision to commence this work, working collaboratively to produce a single Plan.

2.3 Work has commenced on this review, and the authorities consulted on an Issues and Options document between 18th November 2019 and 14th February 2020. Progress to-date has been informed by the findings of the 2017 SHMA and 2019 Housing Needs Study (updated March 2020).

2.4 This included a section on housing needs and how this should be distributed across the Plan area. This was informed by the Central Lancashire Housing Study (October 2019), which looked at how to manage Local Housing Need (LHN) based on the Government's allocation to each Council through the Standard Method. That study was prepared to inform work on updating an existing memorandum of understanding (MOU) between the three councils, to produce a new MOU (MOU2) looking at the role of the Standard Method in identifying housing needs for Central Lancashire. The original MOU (2017) recommended continuation of Policy 4 of the adopted Core Strategy.

2.5 There have also been a large number of planning appeals across the constituent Central Lancashire authorities where the evidence summarised above has been considered. Different appeals have come to different and at times inconsistent conclusions on the identification of the relevant housing requirement for the purposes of decision-taking, the determination of which falls outside the scope of this Housing Study. However, the observations of Inspectors relating to the assessment of housing need and weighing of relevant material considerations when presented with the evidence base for Central Lancashire are potentially relevant to informing the approach to the Housing Study.

2.6 There have been substantive changes to the context of national policy and guidance since this initial evidence was prepared and subsequent to engagement as part of the Memoranda of Understanding outlined above. The overarching application of national policy and guidance must be considered within this chronology, so far as it applies to the preparation and review of policies within Local Plans.

2.7 Paragraph 33 of the NPPF2021 states that reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Earlier review may be required if local housing need is expected to change significantly in the near future.

2.8 PPG (ID: 61-062-20190315) provides further detailed advice in answering the question "how often should plans be reviewed?". This indicates that where a review was undertaken prior to publication of the NPPF (27 July 2018) but within the last 5 years, then that plan will continue to constitute the up-to-date plan policies unless there have been significant changes. This can include changes to relevant cross-boundary matters and, read purposefully and as a whole, the Courts have held that there may be many material changes in the planning circumstances of a local authority's area which would properly render their existing plan policies out-of-date. This could include circumstances where the emergence of

a local housing need figure which is greatly reduced from that in an extant development plan policy constitutes a significant change (see paragraphs 42 and 43 of the judgment of Dove J in the High Court [2020] EWHC 2294 (Admin) *Wainhomes v SSCLG and South Ribble*).

- 2.9 These and other (non-exhaustive) considerations that local planning authorities may consider when determining whether a plan or policies within a plan should be updated are outlined in PPG (ID: 61-065-20190723) and include conformity with national planning policy; impacts of changes to higher order plans; changes to local circumstances (such as a change in Local Housing Need); and various indicators relating to housing delivery and the identification of social, economic and environmental priorities and how these may have changed.
- 2.10 The following sections provide a more detailed review of the background to plan-making and associated evidence and consultation.

b) Background to the Housing Requirement in Adopted Strategic Policies

- 2.11 The current adopted Central Lancashire Core Strategy (2012) was prepared in general conformity with the Regional Spatial Strategy for the North West, notwithstanding its pending revocation at the time of the Examination. This sets an important framework for the current circumstances for plan-making.
- 2.12 While Policy 4 ('Housing Delivery') of the adopted Core Strategy comprises provision within the existing development plan dealing with policy for housing needs and the housing requirement set out in adopted strategic policies (for the purposes of NPPF2021 paragraph 74) it cannot be read in isolation for the purposes of plan-making considerations relevant to preparation of the new Local Plan.
- 2.13 The Core Strategy Inspector's Report records the ambitious proposals for strategic growth put forward to provide for a sound spatial distribution of growth in accordance with the housing requirements set out in the Regional Plan. In principle these are set out through Policy 1 of the Core Strategy and relate back to the authorities' recent background as a 'Growth Point'. The spatial strategy focuses over 90% of growth within the central spine of the plan area, making provision for over 35% of delivery at strategic sites and prioritising the re-use of previously developed land (expected to comprise around 70% of delivery required under the Core Strategy).
- 2.14 The Preston/South Ribble Area represents the main focus for growth and led the identification of additional locations for strategic growth. Delivery of the spatial strategy has long been acknowledged as requiring the facilitation of significant levels of investment to provide for new and upgraded infrastructure to enable growth.
- 2.15 The potential for under-delivery in the early part of the Core Strategy period was acknowledged at the time of the Examination. Within this context, Policy 4 was regarded as making commendable provision to sustain economic growth while not seeking to prolong uncertainty surrounding the approach to assessing housing requirements following revocation of the Regional Plan. Identifying sufficient provision within the spatial strategy did, however, rely on the identification of strategic directions of growth requiring further definition as part of the process to prepare Site Allocations DPDs.
- 2.16 The housing requirement set out in the adopted strategic policies of the development plan therefore pre-dates successive changes to national planning policy and guidance. It has previously been recognised (for example in the Examination of the Chorley Local Plan 2012-2026) that notwithstanding revocation of the RSS there was close accord between official subnational population and household projections (at that time) together with the calculation of objectively assessed housing need and the figures in Policy 4.
- 2.17 The overarching outcome of recent cases is that in circumstances that the housing

requirement in adopted strategic policies is not applied for the purposes of decision-taking, the distributional consequences upon the spatial strategy (as set out through the Core Strategy) must be considered e.g., site selection and the weight to be accorded to policies dealing with safeguarded land. Paragraphs 37 to 38 of EWHC 2294 (Admin) address that the weight to be given to relevant policies is affected by acknowledging that the application of the Standard Method to Central Lancashire is anticipated to require “a future exercise of policy making, involving review and a fresh exercise of redistribution”.

2.18 This does not, however, alter the reality that delivery of the spatial strategy to-date cannot be separated from its relationship with the outputs of official subnational population and household projections. There are at least three key points to consider:

- The spatial distribution of housing delivery across Central Lancashire has been uneven over time and thus is unsurprising given the characteristics of the area and identified locations for housing growth.
- Calculation of minimum annual local housing need using the Government’s Standard Method relies on 2014-based population and household projections and while the Government considers this provides stability for plan-making at the authority level the trend period for these data ‘lock-in’ the specific circumstances for Central Lancashire at a given point in time.
- Wider market signals and necessary adjustments for the affordability uplift in accordance with the Standard Method are likely to be impacted by cross-boundary characteristics within the housing market.

2.19 Preparation of Statements of Common Ground between the constituent Central Lancashire authorities is currently ongoing as part of the Local Plan-making process.

c) **Preston and South Ribble City Deal**

2.20 Both the distribution of housing and the overall need for housing across Central Lancashire is intrinsically linked to economic growth and in particular the aspirations and outcomes generated as part of the City Deal. The City Deal was signed in 2013 and is bringing about investment of £434 million to expand transport infrastructure, create 20,000 new jobs and generate more than 17,000 new homes.

2.21 The expected creation of new jobs and new homes, directly as a result of the City Deal, will not necessarily be reflected in official projections including those informing the calculation of local housing need using the Standard Method. Accordingly, so as to reflect this investment in the area, the provisions set out in the PPG dictating where alternative approaches to the assessment of housing need may require assessment are engaged (ID: 2a-010-20201216).

2.22 The latest Infrastructure Delivery Update sets out the latest and planned infrastructure projects and demonstrates a focus on Preston and to some extent South Ribble when considering infrastructure improvements that are expected to assist with the delivery of housing. This uneven distribution of infrastructure to date is represented in recent trends in housing completions, although is not reflected in projections and will continue to steer the distribution of housing growth across Central Lancashire in the future. As such an assessment of committed and projected funding will need to form part of any assessment of the most appropriate distribution of growth alongside evidence of overall housing need.

2.23 The original target number of new homes in Preston on the City Deal sites is 9,579 which includes an additional 1,000 properties not allocated to specific sites. More information about the City Deal can be found on the Lancashire Economic Partnership (LEP) website⁵.

2.24 The City Deal Infrastructure Delivery Programme sets out the projects and programmes to

⁵ <https://lancashirelep.co.uk/key-initiatives/city-deal/>

be funded and the forecast resources. The City Deal is currently facing a funding gap in the delivery of the Preston Western Distributor road and A582.

- 2.25 Lancashire County Council are the accountable body. They project manage the schemes, take responsibility for the cash flow of the overall plan, and ultimately have the majority of the financial risk.
- 2.26 The City Deal's Executive and Stewardship Board initiated a comprehensive review in March 2018. This decision was driven by a number of factors, one of which being the commitment to review the Deal in its fifth year of implementation as per the original agreement with Government.
- 2.27 The City Deal was originally intended to be a 10-year programme (2014-2024) but has since been extended by a further 5 years to 2029 in order to ensure delivery of the outstanding priorities. It is currently uncertain whether it will be extended again, with this being a strategic matter subject to ongoing engagement by the constituent authorities as part of the plan-making process.

d) Pre-Existing Evidence Base to Inform the Issues and Options Consultation

i) Memorandum of Understanding 1 (September 2017)

- 2.28 In 2017 a Strategic Housing Market Assessment was carried out and a Memorandum of Understanding was agreed in September 2017 (MOU1). This agreement stated that the housing requirement figures in the Core Strategy had been reviewed and the figures did not need updating. It has been accepted by the Councils that in preparing the MOU1 a "review" of Strategic Policy 4 of the JCS has been undertaken and found not to require updating (for the purposes of current NPPF2021 paragraph 74 and footnote 37).
- 2.29 The conclusions of the MOU1 are rooted in the background to joint plan-making and material considerations that underpinned preparation of the Central Lancashire Core Strategy. In this context, the MOU drew upon reinforcing the conclusion that the area functions as one integrated local economy and travel to work area and is a single HMA. Containment levels approach 80% for travel to work and exceed 80% for housing moves when long distance moves are excluded. The MOU1 therefore concerns the proposed distribution within the HMA, as defined, and sought to outline an agreed approach to the distribution of housing prior to adoption of a new plan.
- 2.30 The contents of MOU1 are summarised by Inspector Mark Dakeyne in paragraph 30 of the Decision Letter for an Appeal at Land at Cardwell Farm, Garstang Road, Barton (PINS Ref: 3258889):

"MOU1 noted that continuing to apply the CLCS housing requirement would, amongst other things, reflect the spatial pattern of development set out in Policy 1 of the CLCS, including directing housing growth to priority areas such as Cottam and North West Preston where land had been allocated to deliver significant new housing in accordance with the Preston, South Ribble and Lancashire City Deal; that site allocations had been determined to meet the spatial pattern of development in the CLCS; that the CLCS requirement reflects the high levels of containment for both travel to work and housing market areas (HMA); and that the Policy 1 apportionment would help to address net out-migration from Preston to other parts of the HMA. That the Policy 4 figures were based on the defunct North West Regional Spatial Strategy and had a baseline date of 2003 were not factors that were referred to in MOU1 and, therefore, on the face of it were not given much weight."

- 2.31 These factors were considered by the same Inspector to remain relevant to the Cardwell Farm Decision Letter.

- 2.32 Other Inspectors have determined that completion of the MOU1 pre-dated publication of revisions to the NPPF (first issued July 2018), which introduced a Standard Method for assessing housing need. This outlined a fundamentally different approach to assessing housing need from that used when the 2017 SHMA was carried out.
- 2.33 The circumstances for preparation of the MOU1 have been concluded as having changed significantly, rendering MOU1 out of date and inconsistent with current national policy. Under the terms of the MOU1 this change in circumstances stipulates the requirement for its review based on the latest evidence of housing need.
- 2.34 The recently redetermined Chain House Decision Letter further concludes that the potential use of the figure for minimum annual local housing need (as enabled under national policy) represents a significant change of circumstances when considering Policy 4 as the basis for the housing requirement.
- ii) Central Lancashire Strategic Housing Market Assessment (Preston, South Ribble and Chorley Councils) (September 2017)**
- 2.35 Completion of the MOU1 described above was informed by the Strategic Housing Market Assessment (August 2017).
- 2.36 Both the MOU1 and 2017 SHMA were prepared under the regime of national policy and guidance provided under the NPPF2012 in relation to establishing full objectively assessed housing need for the HMA. The position established through the Courts is that the relevant area for assessment may not be the individual development control authority. The SHMA and MOU1 both have regard to the High Court judgment in *St Modwen Developments Ltd v SSCLG & East Riding of Yorkshire Council* [2016] EWHC 968 (Admin) and to the Court of Appeal judgment in *Oadby & Wigston Borough Council v SSCLG & Bloor Homes* [2016] EWCA Civ 1040.
- 2.37 The principle of the apportionment of housing need within the Central Lancashire HMA has subsequently been accepted by numerous Inspectors considering a range of circumstances in terms of the assessment of housing need and the approach to distribution and identification of the relevant housing requirement.
- 2.38 The 2017 SHMA, undertaken in accordance with the NPPF2012, indicated that if each LPA were to meet its own Objectively Assessed Need (OAN), the total requirement for Central Lancashire would only exceed the Central Lancashire Core Strategy Policy 4 requirement by some 20 dpa, albeit that different distributions would result depending on whether demographic or economic growth figures were used.
- 2.39 Nevertheless, the total of the individual OAN figures for Chorley and South Ribble (based on economic growth) and Preston (based on demographic growth) was found to exceed the OAN figure for the HMA as a whole by a margin of 15%. Within the context of this evidence a distribution of housing based on the current JCS requirements was found to ensure that there is a pattern of development that directs housing growth towards the priority areas, particularly the strategic sites and locations identified in Cottam and North West Preston, where land is already allocated to deliver significant new housing in accordance with the Preston, South Ribble and Lancashire City Deal agreement.
- 2.40 The principle of apportionment was considered in greater detail by Inspector Anne Jordan in her Decision Letter for a Planning Appeal at Land at Pear Tree Lane, Euxton, Chorley (PINS Ref: 3173275). At the time of this Appeal good reasons were identified to consider the JCS distribution to be acceptable in the context of the plan-led approach, and preferable to the Appellant's evidence that considered the OAN in greatest detail for Chorley only (in that case). Great weight was given to the point that the figures in the JCS nevertheless meet the OAN for the plan area as a whole.

- 2.41 A critical difference relating to the testing of the 2017 SHMA in the context of this Appeal relates to the position of guidance at the time, prior to the introduction of the Standard Method. Guidance in these circumstances accepted that the SHMA could not be thoroughly tested at Appeal in the same manner as evidence that has been thoroughly considered and tested prior to the adoption of strategic policies within the development plan.
- 2.42 This position is negated by the clarity provided by more recent revisions to the NPPF and the binary position to apply either the housing requirement in adopted strategic policies or calculation of minimum annual local housing need calculated using the Standard Method for the purposes of decision-taking.
- 2.43 On this basis, the maximum apportionment provided for under the MOU1 approach related to 102 dwellings between Chorley and Preston/South Ribble (the difference between an economic-led OAN of 519 dwellings and JCS Policy 4 requirement of 417 dwellings).
- 2.44 Notwithstanding the differences in methodology and the applicable policy and guidance there are a number of specific observations relating to the approach to assessing housing need in the 2017 SHMA that are of potential relevance to preparation of this Housing Study:
- The SHMA used the 2014-based household projections as the starting point for assessing housing need and is therefore in principle consistent with the starting point for the Standard Method.
 - The SHMA defines Central Lancashire as a self-contained Housing Market Area.
 - Household formation rates within the 2014-based projections were explored in detail. Growth in the Black and Minority Ethnic (BME) population was considered to account for the change in household formation rates in younger households, rather than simply affordability factors, and therefore no justification was identified for making an adjustment to take account of this (paragraphs 4.47 – 4.63).
 - Demographic-led scenarios of housing need consider longer-term changes in net migration within the individual Central Lancashire Authorities as part of a ‘rates based’ approach, where the share of migration is compared relative to the inputs to the 2014-based projections. The 15-year adjustment was considered the preferred approach to address the short-term impact on delivery rates within the 2009-2014 period, resulting in a more balanced distribution of migration flows across Central Lancashire (see paragraphs 4.38 – 4.39 and Tables 27-29). However, if it is noted that this approach was not accepted by the Inspector in the 2017 Pear Tree Lane appeal in Chorley.
 - The 2017 SHMA provides further economic-led details of housing need linked to jobs forecasts, taking account of baseline and planned-growth scenarios and adjustments to economic activity rates. These suggest potentially higher levels of housing need in Chorley (519dpa) and South Ribble (440dpa) compared to demographic-led scenarios. These indicators were provided to inform potential policy decisions, on the basis that at the HMA level a good match between demographic projections and job growth forecasts was identified. The 2017 SHMA identified a need to balance policy-making considerations relating to the economic need focussed growth in Chorley and South Ribble, and the demographic growth from the longer-term trends focused growth in Preston and Chorley (see Tables 40-42 and paragraphs 5.120 – 5.125).
- e) **Memorandum of Understanding & Statement of Cooperation (2020) (MOU2) and Summary of Outcomes**
- i) ***Approach to the Updated MOU***
- 2.45 The constituent Central Lancashire authorities prepared a Memorandum of Understanding, dated April 2020 (MOU2), which aggregates the minimum annual LHN Standard Method figures for the three LPAs and redistributes that housing need across the Central Lancashire

area.

- 2.46 The redistribution relies on evidence in the Central Lancashire Housing Study (March 2020) (CLHS), produced to inform the preparation of the emerging Local Plan, but also sought to provide for an interim set of district level housing requirements, which MOU2 states is ‘to reflect the most sustainable pattern of development in the sub-region’ and ‘to align with City Deal growth aspirations in Preston and South Ribble’. Subsequent updates, within a Statement of Cooperation published by the three Councils in May 2020, incorporated the most recent workplace-based affordability ratios released by the Office for National Statistics (ONS).
- 2.47 Table 1 below summarises the contents of MOU2, as informed by the recommendations of the Housing Study, relative to the calculation of Local Housing Need at the time of its preparation and previous evidence set out through MOU1 and the pre-existing 2017 SHMA.

Table 1 Background to Evidence-Base Housing Requirement Distribution

	LHN 2020		MOU2		MOU1 / CLCS		SHMA 2017	
	dpa	% Of Total	dpa	% Of Total	dpa	% Of Total	dpa	% Of Total
Chorley	569	56.3%	278	27.5%	417	31.1%	519	38.1%
Preston	191	18.9%	404	40.0%	507	37.8%	402	29.5%
South Ribble	250	24.8%	328	32.5%	417	31.1%	440	32.3%
Central Lancashire	1,010	100.0%	1,010	100.0%	1,341	100.0%	1,361	100.0%

Source: ONS; CLG; SPRU Analysis of Various Documents

- 2.48 It is not the purpose of this Housing Study to review in detail all aspects of consideration of the MOU2 in previous Appeals relevant to the circumstances in Central Lancashire. It is, however, important to note the context for Inspector Mike Hayden in the Decision Letter for Land at Pear Tree Lane, Euxton (PINS Ref: 3247136) in concluding that an apportionment of housing need in an emerging joint plan can be a material consideration in decision-making. The apportioned housing need figure based on the analysis in MOU2 and the weight that should be attached to it was considered principally on this basis. This makes the conclusions and approach to existing evidence within the Central Housing Study particularly relevant for review for the purposes of preparing this Housing Study.
- 2.49 The Central Lancashire authorities no longer seek to apply MOU2 (April 2020) dealing with an anticipated redistribution of local housing need for the purposes of decision-taking. One consistent theme arising from recent Appeal Decisions is that any re-distribution of housing requirement amongst the Central Lancashire authorities should not be conducted through decision making outside of the development plan making process. It is similarly the case that Paragraph 61 of the NPPF2021 and the definition of LHN in Annex 2 of the Framework permit an alternative approach to the Standard Method to be used to calculate the LHN in the context of preparing strategic policies only.

ii) Central Lancashire Housing Study – Final Report (Iceni, March 2020)

- 2.50 The Central Lancashire authorities commissioned a further housing study which was completed in March 2020. This comprised evidence to support preparation of the MOU2 described above.
- 2.51 The Central Lancashire Housing Study (CLHS) is acknowledged not to have assessed need in the same way that was explored in the pre-existing 2017 SHMA. The CLHS focuses upon LHN as a basis for the housing requirement, not on whether to plan for a higher level of need. In addition to findings in relation to affordable and other specific housing needs, it

recommended that, pending the adoption of a new local plan, LHN should be used as a basis for assessing five year housing supply and that the LHN should be redistributed.

2.52 The findings of the CLHS and implementation of its recommendations have also been criticised by stakeholders for not taking account of a review having already been undertaken for the purposes of national policy in footnote 39 of the NPPF2021 (even where the constituent Central Lancashire Councils have not continued to argue for the currency of that review).

2.53 Inspector Mike Hayden provides a summary of the approach to preparation of the CLHS at paragraph 27 of the Decision Letter (PINS Ref: 3247136):

“The CLHS considers a range of factors to inform the future distribution of the aggregated Standard Method LHN for the three Central Lancashire authorities. These include the distribution of population, jobs, workforce and affordable housing need across the sub-region, the relative affordability and urban capacity of each district, the existing spatial strategy for Central Lancashire and the proportion of land not subject to national policy constraints. The distributions for Chorley range from 18% for urban capacity to 36% for affordability.”

2.54 Inspector Hayden’s subsequent reasoning explored that the overall recommendation of 27.5% for Chorley (in that case) was dependent on judgement across the indicators considered, meaning that higher or lower alternatives within the range identified could potentially be justified. Further issues related to arguments concerning the potential impact on affordable housing delivery and that the CLHS does not address the potential influence of sub-market housing dynamics on need. These factors led to the conclusion that very little weight could be given to the position in the emerging MOU given the very early stage of plan-making and its potential to identify a ‘constrained’ housing requirement figure in Chorley.

iii) Consultation Outcomes Report relating to preparation of the updated MOU2

2.55 The MOU2 and Statement of Cooperation was subject to consultation on the provision and distribution of housing land and ran over a period of 7 weeks, from 4th November 2019 to 13th January 2020. The constituent Central Lancashire authorities acknowledged that the process for preparing the MOU2 was subject to significant and substantial outstanding objections, as set out in the Consultation Outcomes Report taken to the Central Lancashire Joint Advisory Committee (JAC) on 28th January 2020. This report is also relevant to understanding the role of the evidence base for the MOU2 in assessing housing need.

2.56 There are a number of themes arising from the Consultation Outcomes Report relevant in this regard, which can be briefly summarised as follows:

- Requesting the assumption that Central Lancashire still operates as a single HMA needs to be re-visited.
- Failure to reflect the influence of past delivery rates and the implications of the calculation of local housing need using the Standard Method as a minimum starting point, noting that this provides for a lower figure than the Core Strategy.
- Reliance on previous Appeal Decisions that support the apportionment of housing need (either within the context of the adopted Core Strategy and MOU1/SHMA 2017 (PINS Ref: 317275) or the ‘direction of travel’ towards use of the Standard Method (PINS Ref: 3234070 – subsequently quashed).
- Failure to fully assess the housing needs of different groups, including the delivery of affordable housing as a proportion of the proposed distribution of the housing requirement.
- Inadequate consideration given to growth strategies and strategic infrastructure

projects such as the City Deal.

f) Central Lancashire Local Plan Issues and Options Consultation and Summary of Outcomes

- 2.57 The constituent Central Lancashire Councils sought views on the Local Plan Issues and Options for Central Lancashire from Monday 18th November 2019 until Friday 14th February 2020.
- 2.58 Publication of the associated Issues and Options Consultation document for this stage in plan-making states that *“it is likely that the number of homes we must deliver for this plan period of 2021-2036 will be different”* to existing policy in Central Lancashire. The Standard Method-derived figures published for consultation within the document identified the minimum number of homes required across Central Lancashire as 1,033 dwellings per annum.
- 2.59 The ‘direction of travel’ towards use of the Standard Method outlined within the Issues and Options Consultation Document has been referred to in a number of recent Appeal Decisions. The evidence base for this consultation therefore looked beyond the pre-existing 2017 SHMA. This reflects the contents of the updated Memorandum of Understanding (‘MOU2’) (as summarised in the preceding sub-section) as also being under preparation alongside the Councils seeking views on the Issues and Options consultation.
- 2.60 The Issues and Options Consultation and its supporting evidence base, including a draft version of the CLHS available at that time, introduces the prospects for a redistribution of the housing requirement based on a range of factors including population, workforce and jobs distribution and constraints (including Green Belt).
- 2.61 At this early stage in plan-making the constituent Central Lancashire Councils acknowledge that the Issues and Options Consultation Document carries unresolved objections to the quantum, distribution and location of housing development. The Councils’ summary of ‘consultation outcomes’ on relevant questions relating to the topic of ‘Delivering Homes’ including the scale and distribution of the housing requirement note concerns from both residents and development stakeholders when these are considered relative to calculation of the Standard Method.
- 2.62 While only a limited number (15% of 611 responses) considered that minimum local housing need calculated by the Standard Method should be exceeded the following specific points were noted:
- The extent to which other factors such as the City Deal should be factored into the level of housing need to be provided for and seeking to align housing distribution to planned infrastructure and growth ambition.
 - The impact and opportunity of planning for further large-scale development.
 - Seeking to ensure alignment between the overall assessment of need and delivery of requirements by mix and tenure.
 - Enabling a more even distribution across the plan area to ensure each area can meet the needs of constituent authorities within Central Lancashire
 - Having regard to land-use constraints and maximising opportunities for development in built up areas, including previously developed land.

g) Studies of Housing Need and Demand Prepared at the Sub-Housing Market Area Level
i) South Ribble Local Housing Needs and Demand Study (arc4, 2020)

- 2.63 The South Ribble Local Housing Needs and Demand Study, prepared by arc4, was published

in January 2020. Rather than assessing overall housing need, the study focuses specifically on the need for affordable housing, the size, type and tenure of future housing, and the needs of particular groups.

- 2.64 The 2020 study identified an annual need for 296 affordable homes in South Ribble with a target of affordable housing provision of 30%, of which 20% should be social rented, 5% affordable rented and 5% intermediate tenure. The study also recommended the following profile of dwelling stock:
- 1-bedroom 11.6%, 2-bedroom (36.2%), 3-bedroom (40.7%) and 4 or more bedroom (11.6%).
 - A broad split of 55.1% houses, 26.3% bungalows, 17.5% flats and 1.0% other (or 55.1% houses and 44.9% level-access accommodation).
- 2.65 In terms of meeting the specialist housing needs of older people, the 2020 study recommended a need for an additional 382 units of residential (C2) accommodation and 652 units of specialist (C3) accommodation to 2026. The study also identified further specific needs including:
- At least one extra care scheme for older adults (based on Lancaster County Council (LCC) recommendations).
 - More modern flatted schemes for people with learning disabilities.
 - Clusters of self-contained units for people with mental health issues.
 - Meeting the needs of ex-service personnel which reflects the Armed Forces Community Covenant.
 - A range of move-on accommodation for care leavers.
- 2.66 It is understood that the modelling in the arc4 2020 study for South Ribble is to be updated to take account of the housing need figure recommended in this Housing Study report, as has previously been undertaken in the arc4 studies for Chorley and Preston (see below).
- ii) Chorley Housing Need and Demand Assessment (arc4, 2022)**
- 2.67 This Housing Need and Demand Assessment calculates an annual need for 113 affordable homes across Chorley with the detailed steps for the calculation of affordable housing need set out in Appendix C. Assumptions for gross household formation are derived from a blended rate of outputs from the official 2014-based and 2018-based household projections and thus independent from the minimum annual local housing need calculated in accordance with the Standard Method.
- 2.68 An overall affordable tenure split for new affordable housing (including a minimum First Homes requirement of 25%) is 39% social rented, 20% affordable rented, 16% affordable home ownership and 25% First Homes.
- 2.69 The assessment also identifies a need for 771 additional units of accommodation for older people by 2038, including sheltered/retirement, extra care, co-housing and residential care.
- 2.70 Based on an assessment of additional needs and longer-term demographics, 4.2% of new dwellings (11 each year) should be built to M4(3) wheelchair accessible standard; and all other new dwellings should be built to M4(2) accessible and adaptable standard.
- 2.71 Assessments of the housing needs of different groups derived within the arc4 Report are calculated using specific evidence of need and do not rely upon assumptions for the projected demographic and household characteristics of the area that would result from provision for housing provision in accordance with local housing need calculated using the Standard Method.

iii) Preston Housing Need and Demand Assessment (arc4, 2022)

- 2.72 This Housing Need and Demand Assessment states there is a net annual need for 377 affordable homes across Preston. The detailed steps for the calculation of affordable housing need set out in Appendix C. Assumptions for gross household formation are derived from a blended rate of outputs from the official 2014-based and 2018-based household projections and thus independent from the minimum annual local housing need calculated in accordance with the Standard Method.
- 2.73 An overall affordable tenure split for new affordable housing is 88% rented and 12% affordable home ownership. If First Homes is considered, the overall tenure split adjusts to 68% rented and 32% affordable home ownership. The shift towards home ownership reflects the impact of First Homes on overall tenure split and a specific need for affordable home ownership products evidenced in the 2021 household survey.
- 2.74 Regarding student housing, any future purpose-built student housing needs to be carefully considered by the council and the University of Central Lancashire and should be to address gaps in quality of provision rather than to meet a growing student demand.
- 2.75 There is a need to increase and diversify the supply of specialist housing for older people. There is a need for 1,903 more units of accommodation for older people by 2038. This includes sheltered/retirement, extra care, co-housing and residential care.
- 2.76 There is a specific need from BAME households, particularly from Asian community households who need for larger dwellings.
- 2.77 Based on an assessment of additional needs and longer-term demographics, 4% of new dwellings (10 each year) should be built to M4(3) wheelchair accessible standard; and all other new dwellings should be built to M4(2) accessible and adaptable standard.
- 2.78 As per the recently produced Need and Demand Assessment of the housing needs of different groups for Chorley Council, outputs derived within the arc4 Report are calculated using specific evidence of need and do not rely upon assumptions for the projected demographic and household characteristics of the area that would result from provision for housing provision in accordance with local housing need calculated using the Standard Method.

3.0 DEFINITION OF THE HOUSING MARKET AREA

- 3.1 This section of the report provides analysis for the Central Lancashire area (City of Preston, Borough of South Ribble and Borough of Chorley) with the objective of defining the geography of its housing market area (HMA) with reference to its relationship with neighbouring administrative areas. The findings from this section of the Housing Study forms part of initial conclusions from the analysis and assists in structuring the approach to the remainder of the study.
- 3.2 This Housing Study represents the most up-to-date analysis to establish the geography of housing market areas within the Central Lancashire area. The assessment utilises the latest available data on migration and commuting from the 2011 Census. While these data have been published for several years their contents are applied in the context of this study alongside other more recent information including details of house prices and annual estimates of internal migration flows.
- a) National Policy and Guidance**
- 3.3 The analysis is consistent with the most recent version of the Planning Practice Guidance (PPG) applicable to preparation of the study. Within the PPG, housing market areas are defined as:
- “a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.”* (ID: 61-018-20190315)
- 3.4 In the context of the preparation of strategic policies, where the figure for local housing need is calculated as the number of homes identified as being needed through the application of the *Standard Method* set out in PPG, each local authority administrative area is treated as forming its own housing market area. However, where strategic policies are being produced jointly the housing need figure for the plan area should be at least the sum of the local housing need for each local planning authority within that area. This combined housing need figure should then be translated into a housing requirement figure for the plan area (considering how much of the overall housing need can be accommodated) (PPG, ID: 2a-013-20201216). The relevant strategic policy-making authorities should then distribute the total housing requirement across the plan area (i.e. decide how much of the overall housing requirement will be met in each local authority) through strategic policies in the plan. The definition of the extent of the HMA is therefore important to understanding both the dynamics of the local housing market and policy options to address the level of identified housing need.
- 3.5 The HMA definition is also relevant to inform the housing policies of the plan including those identified by paragraph 62 of the NPPF 2021 in terms of assessing the housing needs of different groups. Definition of the HMA may also assist with the understanding of current and future demographic trends.
- 3.6 In relation to housing needs it is also relevant to highlight that national policy seeks to ensure that the preparation of strategic policies assists in supporting conclusions on whether development needs that cannot be met wholly within a particular plan area could be met elsewhere (NPPF 2021 paragraphs 26 and 61). This reflects the Localism Act 2011, which includes the statutory Duty to Cooperate on strategic planning for cross-boundary issues.
- 3.7 Paragraph 31 of the NPPF 2021 establishes that the evidence base for strategic policies should be “adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.” Setting out evidence for definition of the HMA is important in the context of satisfying these requirements for plan-making.

- 3.8 The PPG provides three key recommendations for analysis for broadly defining housing market areas:
- *“The relationship between housing demand and supply across different locations, using house prices and rates of change in house prices. This should identify areas which have clearly different price levels compared to surrounding areas.*
 - *Migration flow and housing search patterns. This can help identify the extent to which people move house within an area, in particular where a relatively high proportion of short household moves are contained, (due to connections to families, jobs, and schools).*
 - *Contextual data such as travel to work areas, retail and school catchment areas. These can provide information about the areas within which people move without changing other aspects of their lives (e.g., work or service use).” (ID: 61-018-20190315)*
- 3.9 The analysis within this section deals specifically with the first two bullets in the context of defining the geography of the HMA. The third bullet, reflecting a wider range of contextual data, is presented as part of a broader summary of findings from the assessment of other secondary sources. This includes brief consideration of retail and education catchments, although these are typically less relevant to the definition of sub-regional housing market geographies. Travel to work catchments and commuting flows are also relevant for consideration under the third bullet but findings on these data should be considered together with definition of the appropriate Functional Economic Market Area (FEMA) for Central Lancashire considered elsewhere in the Council’s evidence base, including in the Central Lancashire Employment Land Study (BE Group, 2022).
- 3.10 This reflects that the degree of competing factors affecting the definition of HMA boundaries is also reflected in guidance for the definition of Functional Economic Market Areas. Planning Practice Guidance identifies that the HMA may be one relevant factor to consider, but as patterns of economic activity vary from place to place a standard approach cannot be used to arrive at a definition. Criteria recommended for consideration by the PPG are stated as:
- *extent of any Local Enterprise Partnership within the area;*
 - *travel to work areas;*
 - *housing market area;*
 - *flow of goods, services, and information within the local economy;*
 - *service market for consumers;*
 - *administrative area;*
 - *catchment areas of facilities providing cultural and social well-being; and*
 - *transport network. (ID: 61-019-20190315)*
- 3.11 The three elements for definition of HMA boundaries are essentially unchanged from previous iterations of Planning Practice Guidance⁶ and earlier best practice advice, albeit this was more prescriptive in terms of suggested thresholds for identifying containment. This makes it reasonable to compare previous definitions of the HMA and utilise these as one source of evidence for this report but noting that the plan-making context and available data may be different.
- 3.12 This Housing Study must take account of revisions to PPG that specifically address the criteria for the definition of ‘self-containment’ relevant to definition of HMA boundaries.

⁶ See: Paragraph: 011 Reference ID: 2a-011-20140306

- 3.13 Iterations of PPG prior to September 2018 reflected recommendations identified in the 2007 CLG Advice Note 'Identifying Sub-Regional Housing Market Areas'. This advised a 70% threshold for containment of moves on the demand-side (i.e., 70% of all those moving into a dwelling have moved from that same area) and supply-side (i.e., 70% of all those moving out of a dwelling move within that same area). Planning Practice Guidance now states:

*"Migration flow and housing search patterns. This can help identify the extent to which people move house within an area, in particular where **a relatively high proportion of short household moves** are contained, (due to connections to families, jobs, and schools)." (ID: 61-018-20190315) (SPRU emphasis)*

- 3.14 The revisions to guidance to some extent better reflect the ability for flexibility and provide scope to respond to local circumstances when considering justification for HMA boundaries. Previous conclusions regarding the housing market area for Central Lancashire can therefore be reassessed in this context.

b) Summary of Previous Guidance and Best Practice

- 3.15 It is accepted that multiple potential outcomes may be justified when identifying relevant boundaries for HMAs. The relevant criteria that must be considered do not necessarily support identical conclusions in terms of the choice of individuals, comprising the population of an area, in terms of chosen locations for housing or employment. These choices can be affected by multiple factors not all of which are relevant to the criteria identified within guidance (e.g., physical geography) whereas aspects such as affordability can be a key driver. As a result, the potential boundaries of HMAs can and do overlap.
- 3.16 Given this potential variability in conclusions on definition of the relevant HMA boundary it is relevant to consider other examples of best practice. In 2015 the Planning Advisory Service (PAS) published its Technical Advice Note (2nd edition) 'Objectively Assessed Need and Housing Targets'. This recommended that using HMAs identified at the national level is a useful starting point for analysing HMAs at a Local Authority level. These recommendations remain useful notwithstanding that the overall approach to assessing housing need has been superseded by revisions to national policy.
- 3.17 The 'Geography of Housing Market Areas' was a report published by the Department for Communities and Local Government in 2010. The study was commissioned by the former National Housing and Planning Advice Unit (NHPAU) and undertaken by the Centre for Urban and Regional Development Studies (CURDS). The study recognised that whilst there was no single approach or data source that could provide a definitive solution to identifying HMAs, migration patterns and commuting flows were the most relevant sources of information when identifying upper tier HMAs, with house prices only becoming relevant at the more local/sub-market level.
- 3.18 In the context of the CURDS study, it is relevant to note that the guidance produced by PAS suggested that for the assessment of housing need the most useful direction for the definition of HMA boundaries is the single-tier 'silver standard' geography. This follows administrative local authority boundaries. The findings of the CURDS study in relation to Central Lancashire are presented alongside existing evidence for definition of the HMA.

c) Existing Evidence for Definition of the Housing Market Area

- 3.19 Prior to undertaking an assessment of the available data, it is relevant to assess the existing body of evidence dealing with the definition of housing market area boundaries for the Central Lancashire area. In order to structure this review of existing material and previous findings the following sources will be considered within this section:
- Geography of Housing Market Areas (CURDS / NHPAU, 2010)

- Evidence previously produced for the Central Lancashire area
- Previous Housing Market Assessments from neighbouring authorities

3.20 The summary of these sources is that a strong justification exists to determine that the HMA boundary for the Central Lancashire area should be identified to correspond with the administrative boundary for the combined authorities.

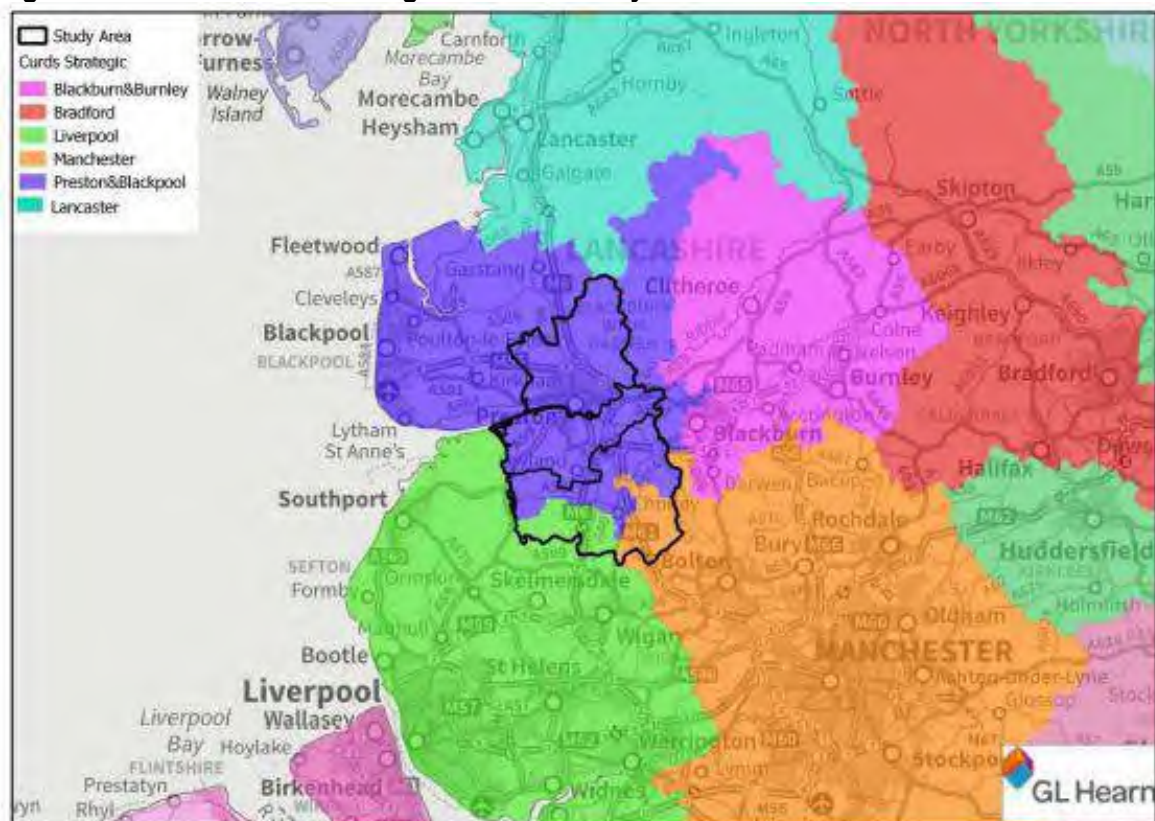
i) The Geography of Housing Market Areas (CURDS, 2010)

3.21 This study pre-dates data from the 2011 Census for England and Wales but provides a useful starting point for definition of housing market areas at the national level.

3.22 The Geography of Housing Market Areas identified a three-tiered hierarchy of HMAs; these were Strategic; Single-Tier; and Local Market Areas.

3.23 In the context of the Central Lancashire area, and in contrast to recommendations on housing market area geography in large parts of the rest of the country, at all levels the CURDS findings correlate closely with the administrative boundaries, as shown in Figure 1 below.

Figure 1 CURDS-defined strategic HMA boundary



Source: Central Lancashire Strategic Housing Market Area Assessment (GL Hearn, 2017, Figure 2, p.18)

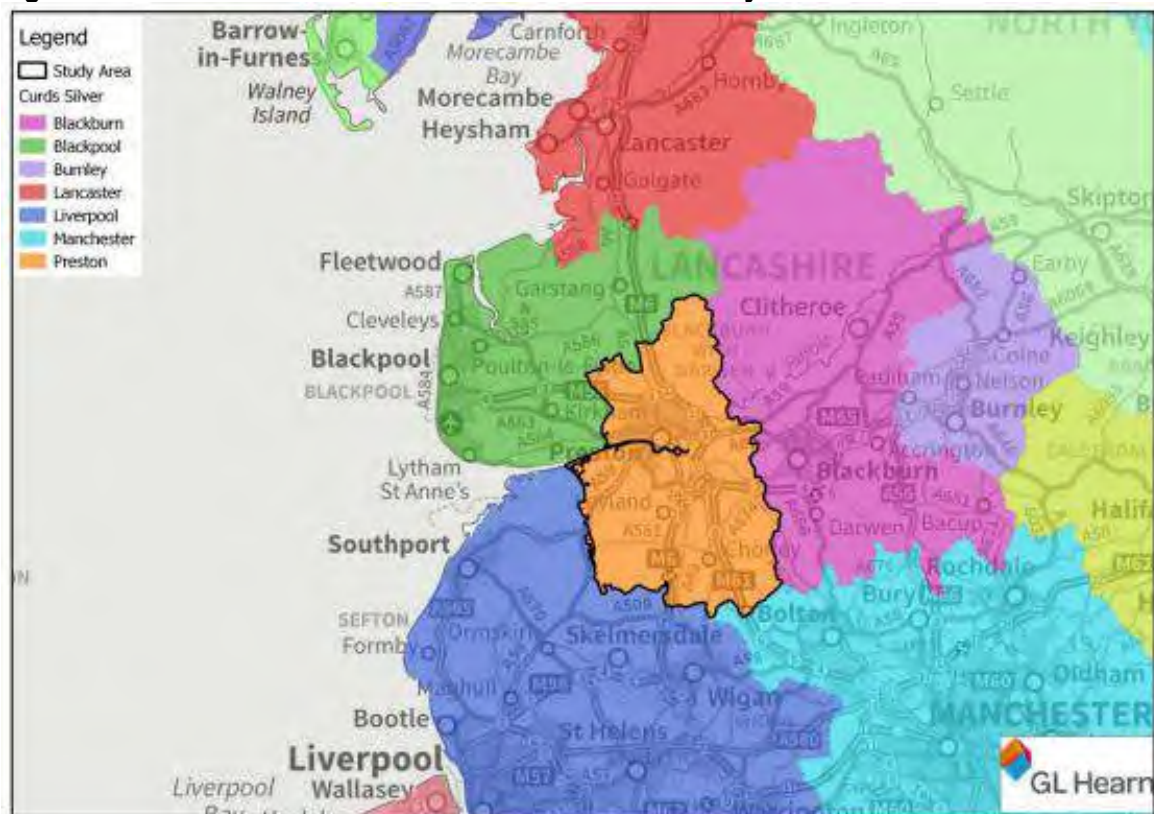
3.24 The first analysis considers the Strategic HMA boundary. This is based on long distance commuting flows and suggests that the majority of the Central Lancashire area sits within the Preston and Blackpool Strategic HMA. In the Chorley Council area there is a slight overlap with the Manchester HMA to the south east and with the Liverpool HMA to the south west. The analysis of Local Market Areas sits inside the findings of the Strategic HMA looking at containment of migration patterns within the Strategic HMA boundary.

3.25 The second analysis, using a single-tier geography defined by combining migration and commuting flows to define a single boundary where both criteria are met, also suggests that

the Central Lancashire area lies within a single HMA.

- 3.26 A 'silver-standard' output of the single-tier geography was produced where these outputs follow local authority boundaries, as shown in Figure 2. The Central Lancashire area is identified as a Preston HMA comprising the administrative boundaries of Preston City, Chorley Borough, and South Ribble Borough.

Figure 2 CURDS-defined 'Silver Standard' HMA boundary



Source: Central Lancashire Strategic Housing Market Area Assessment (GL Hearn, 2017, Figure 4, p.20)

ii) Previous Evidence Produced for Central Lancashire

- 3.27 The adopted Central Lancashire Core Strategy 2012 is based on the conclusion that the administrative area forms a single Housing Market Area. Subsequent plan-making activity in reviewing the JCS has sought to utilise the same definition of the HMA and reflects two main sources within the evidence base:
- Central Lancashire Strategic Housing Market Assessment (GL Hearn, 2017)
 - Central Lancashire Housing Study (Iceni Projects Ltd, 2020)
- 3.28 Both of these resources utilise data from the 2011 Census for England and Wales and it is not necessary to repeat the findings in detail given the reassessment undertaken in this report.
- 3.29 In brief however, the Central Lancashire Strategic Housing Market Assessment (SHMA) published in 2017 defines the HMA as a 'best fit' to the local authority boundaries of Preston, Chorley and South Ribble. This is based on a review of previous studies together with an updated assessment of house price, migration and commuter flow data. The 2017 SHMA identified broadly similar house prices across the Central Lancashire authorities as well as a high migration self-containment rate (including long distances) of 70-72%.

- 3.30 The largest gross migration flows for each local authority in the study area involved the other two authorities, illustrating strong inter-relationships between the three authorities of Chorley, South Ribble and Preston. In terms of commuting patterns, all three Central Lancashire authorities were found to fall entirely within the Preston Travel to Work Area (as published by ONS in 2015, based on 2011 Census data), which also contains parts of Wyre, Fylde and Ribble Valley local authority areas. Central Lancashire was found to have a resident self-containment rate of 71%, meaning that 71% of Central Lancashire's residents also work within Central Lancashire. On the basis of this analysis, GL Hearn conclude that, despite there being links with other adjoining areas, Chorley, Preston and South Ribble form part of a common and unique Housing Market Area.
- 3.31 The Central Lancashire Housing Study (Iceni Projects, 2020) sets out a brief review of the HMA as defined in the 2017 SHMA stating that there has been no change in Planning Practice Guidance since the SHMA was published, and besides changes in house prices much of the data on which the 2017 SHMA definition of the HMA was based remained the most recent available. Iceni therefore conclude that the SHMA definition of the Central Lancashire HMA as comprising Preston, Chorley and South Ribble remains appropriate.
- iii) Previous Definition of Housing Market Areas within Neighbouring Authorities**
- 3.32 As part of this section, it is useful to place the administrative geography of the Central Lancashire area within its wider sub-regional context. Figure 3 below shows the location of the Central Lancashire area alongside its boundaries with neighbouring authorities and proximity to the Greater Manchester and Merseyside sub-regions.

Figure 3 The Central Lancashire Context – Boundaries with Neighbouring Authorities



Source: SPRU

- 3.33 It is apparent that the greatest proportion of the immediate shared boundary between the three constituent Central Lancashire authorities with neighbouring areas is made up by Greater Manchester to the south east and Merseyside to the south west.
- 3.34 A number of HMA studies have previously been undertaken in the North West region which were used to inform housing allocations and to understand the link between housing and labour markets. These studies include:
- **Ecotec (2006) Study into the Identification of Housing Market Areas for the Development of the Regional Spatial Strategy in the North West** – In this report, Central Lancashire was found to sit entirely within a wider Preston HMA.
 - **Brown, P. J. B. and Hincks, S. (2008) ‘A Framework for Housing Market Area Delineation: Principles and Application’ Urban Studies, 45, 11, 2203-2223.** – In this research, Brown and Hincks also define the Central Lancashire authorities as falling within a wider Preston HMA.
 - **Nevin Leather Associates, Inner City Solutions, and University of Sheffield (2008) The definition of housing market areas in the North West region. Wigan, NWR** – This report defines a Central Lancashire HMA comprising the three Central Lancashire authorities of Preston, South Ribble and Chorley.

iv) Most Recent Definition of the Housing Market Area within Neighbouring Areas

3.35 Table 2 below provides a summary of recent evidence for the definition of HMA boundaries within surrounding local authority areas, none of which identifies any of the Central Lancashire authorities as falling within their respective HMAs.

Table 2 Summary of HMAs in Neighbouring Authorities Based on Recent Evidence

Authority	Definition of HMA	Source
<p>Central Lancashire</p>	<p>In market-terms (as reflected in the house price analysis) there are some distinctions particularly in relation to the urban areas of Preston and more rural areas of Chorley, South Ribble and indeed northern Preston.</p> <p>Both migration and Travel to Work patterns identify a degree of self-containment which exceeds expected thresholds for housing market areas. Preston has primacy within the study area with a high level of migration self-containment in its own right with the other local authorities' strongest migration patterns being with the City. The evidence however clearly shows close inter-relationships between the three authorities supporting the identification of a common housing market area.</p> <p>Preston is by far the largest employment location within the study area. This is also reflected in the ONS travel to work area definition which extends across the commissioning authorities and into parts of Wyre, Fylde and Ribble Valley administrative areas. The three authorities all fall within the Preston TTWA.</p> <p>In GL Hearn's view, the triangulation of the sources strongly supports defining a single HMA and FEMA across the Central Lancashire area. It is however important to recognise housing market overlaps between authorities in this area.</p>	<p>Central Lancashire Strategic Housing Market Assessment – Preston, South Ribble and Chorley Councils (GL Hearn, September 2017)</p>
<p>Greater Manchester</p>	<p>The SHMA identifies that Greater Manchester has a high rate of self-containment (81%), with only 1 in 10 people working in Greater Manchester commuting in from outside. Broadly the northern districts of Greater Manchester (Oldham, Wigan, Bolton, Rochdale and Tameside) have the highest levels of self-containment. Wigan is the only district where more than 15% of workers travel outside Greater Manchester to work, having strong connectivity with Merseyside and West Lancashire.</p> <p>Whilst some significant migratory links were identified between Bury and Rochdale and Chorley, and commuter flows from Chorley to Bolton and Wigan to Chorley, these were not significant enough to indicate that Chorley would form part of the Greater Manchester HMA. Indeed, the report concludes that Greater Manchester is sufficiently self-contained such that it forms a functional Housing Market Area.</p> <p>An update to the Greater Manchester SHMA was published</p>	<p>Greater Manchester Strategic Housing Market Assessment (GMCA, January 2019)</p> <p>Greater Manchester</p>

Authority	Definition of HMA	Source
	<p>in April 2021. As in the previous SHMA, Greater Manchester is defined as a single HMA for strategic planning purposes, despite having important and valuable relationships with neighbouring districts and areas further afield.</p>	<p>Strategic Housing Market Assessment Update (GMCA, April 2021)</p>
<p>Bolton</p>	<p>In Bolton over 77% of the moves are local and therefore the Borough is considered as a single market area. The 2001 Census and the 2006 Housing Needs Survey suggest that there are also sub-markets within the Borough.</p> <p>The 2006 Housing Needs Survey shows that Bolton has made significant population gains from areas such as Salford, Manchester, Bury and Wigan. In contrast there are only minor migration links with Blackburn and Darwen, Warrington/St. Helens and Chorley/Preston.</p>	<p>Bolton Strategic Housing Market Assessment (David Couttie Associates, 2008)</p>
	<p>The 2011 Census migration data suggests that 72.6% of households move within Bolton and 63.3% of residents in employment work within the Borough. The 2015 Household Survey found that 67.7% of moving households intend to move within Bolton Metropolitan Borough, 10.5% intend to move elsewhere within Greater Manchester and 21.8% outside Greater Manchester.</p> <p>Bolton can therefore be described as a self-contained housing market on the basis of migration. However, in the terms of travel to work it is in fact part of a wider functional 'Manchester' Strategic Housing Market Area.</p>	<p>Bolton Housing Study (arc4, March 2016)</p>
<p>Wigan</p>	<p>The draft Wigan SHMA was consulted on in late 2015 but did not progress to a final version due to work commencing on the Greater Manchester SHMA.</p> <p>The draft SHMA provided a detailed analysis of the local housing market in terms of Wigan's location within Greater Manchester and the North West, and looked in detail at both national and local issues that would influence the direction of the future housing market in the borough to 2026.</p> <p>As noted above, the Greater Manchester SHMA identifies Wigan as part of the Greater Manchester housing market area and assesses housing needs to 2035.</p>	<p>Draft Wigan Strategic Housing Market Assessment (2015)</p>
	<p>The Housing Study states that based on migration and travel to work data, the borough cannot be described as a highly self-contained housing market area. It also identifies strong economic interactions with the wider Manchester City Region.</p>	<p>Wigan Housing Study (arc4, 2020)</p>
<p>West Lancashire</p>	<p>The SHELMA defines two housing market areas which cover parts of the Liverpool City Region: a Liverpool HMA which includes the local authorities of Knowsley, Liverpool, Sefton, Wirral and West Lancashire; and a Mid Mersey HMA which includes Halton, St Helens and Warrington.</p> <p>The 2009 West Lancashire SHMA concludes that West Lancashire forms part of the Liverpool City Region in</p>	<p>Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA) (GL Hearn, March 2018)</p>

Authority	Definition of HMA	Source
	<p>housing market terms, identifying particularly links with Sefton. It also identified linkages to other areas, notably Wigan and St. Helens to the east and Central Lancashire to the north east.</p> <p>There are also flows between West Lancashire and both Merseyside and Central Lancashire; but the stronger links are towards Merseyside, particularly with Sefton. This supports the inclusion of West Lancashire within a Liverpool-focused HMA.</p> <p>Strong flows between authorities suggests that the definition of a broader strategic HMA is justified for the purposes of this LCR-level assessment. Liverpool, Wirral, Knowsley, Sefton, and West Lancashire together have a self-containment of around 90%.</p> <p>The ONS 2011 Travel to Work Areas (TTWAs) identify a Liverpool TTWA which covers Liverpool, Knowsley, Sefton and most of West Lancashire. Halton and St. Helens however are included within the Warrington and Wigan TTWA, while Wirral is included in the Birkenhead TTWA.</p> <p>Analysis suggests the definition of a Functional Economic Market Area (FEMA) which covers Halton, Knowsley, Liverpool, Sefton, St Helens, West Lancashire, and Wirral.</p>	
	<p>The 2017 HEDNA is a 'West Lancashire take' on the Liverpool City Region SHELMA. It uses information from government statistics (e.g., household projections) and from experts in fields such as employment forecasting to come up with an objectively assessed need for housing and employment land in West Lancashire over the period 2017-2037. Notably it does not seek to amend the definition of HMAs within the LCR. An update to the HEDNA was commenced in 2020 but has not yet been published.</p>	<p>West Lancashire Housing and Economic Development Needs Assessment (HEDNA) (GL Hearn, 2017)</p>
<p>Blackburn and Darwen</p>	<p>This study is a joint study assessing the future development needs for both housing and employment land across the Blackburn with Darwen and Hyndburn joint Housing Market Area. The most recent Housing and Economic Needs Assessment Study was commissioned jointly by Hyndburn and Blackburn with Darwen Borough Councils in 2018. The study was undertaken by GL Hearn and assesses the future development needs for housing (both market and affordable) and employment across the Blackburn with Darwen (BwD) and Hyndburn joint Housing Market Area. It does not seek to revisit the definition in the 2014 SHMA.</p>	<p>Blackburn with Darwen Housing and Economic Need Assessment (GL Hearn, December 2018)</p>
	<p>The 2009 SHMA covering BwD and Hyndburn considered both Boroughs as a single self-contained HMA. Excluding long-distance movements, an assessment of 2001 Census data on migration suggests that the Borough has a self-containment of comfortably over 70%, at around 75%. Given that the former CLG Guidance recognises that the</p>	<p>Strategic Housing Market Assessment and Housing Needs Study Final Report – Blackburn with Darwen and</p>

Authority	Definition of HMA	Source
	<p>level of self-containment in rural authorities is often lower than elsewhere, it is argued that the Boroughs represent a self-contained HMA.</p> <p>Research on migration patterns as set out in the HNS (2014), reinforced the high levels of self-containment in the Boroughs (at over 76%) at a regional scale. On this basis it was concluded that BwD and Hyndburn constituted a single HMA for the purpose of considering housing needs in the context of the Local Plans.</p>	<p>Hyndburn Borough Councils (Lichfields, 2014)</p>
<p>Ribble Valley</p>	<p>The Ribble Valley SHMA was published in 2013 and formed part of the evidence base that underpinned the Core Strategy (adopted December 2014). The SHMA does not seek to define the Housing Market Area within which Ribble Valley is located.</p>	<p>Ribble Valley Strategic Housing Market Assessment (Ribble Valley Borough Council, 2013)</p>
	<p>An earlier SHMA was published by Ribble Valley Borough Council in 2008. This report states that whilst previous research supports looking at Ribble Valley as a single housing market area, the borough does have clear linkages to neighbouring markets, including an indicative housing market area which extends out from Preston into the westernmost parts of Ribble Valley borough. The report concludes that Ribble Valley does not share a coherent housing market area with any single adjacent authority or group of authorities, but instead forms part of a complex pattern of economic and housing market linkages with other parts of the North West and adjoining Yorkshire authorities. It is noted that the North West Regional Assembly confirmed the decision to establish Ribble Valley as a single housing market area, which subsequently formed the basis for the 2008 SHMA.</p>	<p>Ribble Valley Strategic Housing Market Assessment (Ribble Valley Borough Council, 2008)</p>

Authority	Definition of HMA	Source
<p>Wyre Council and Fylde Council</p>	<p>A Strategic Housing Market Assessment (SHMA) for the Fylde coast authorities of Blackpool, Fylde and Wyre was published in February 2014. The assessment concludes that the three Fylde Coast authorities operate as a relatively strong and distinct housing market area. There was found to be a high level of self-containment with regards flows of commuters and the movement of people showing relatively limited flows with surrounding authorities.</p> <p>In terms of connections to surrounding areas, the analysis of commuting and migration patterns suggested that the Fylde Coast shared the strongest relationships with Preston and Lancaster. Individual authorities within the Fylde Coast also have comparatively established relationships with South Ribble, Pendle and Manchester.</p> <p>The report found that the high levels of containment in the Fylde Coast did however support the consideration of objectively assessed needs and demands for housing within this geography, recognising the evidenced linkages with a number of surrounding authorities.</p> <p>Two addenda to the 2014 SHMA were published in November 2014 and May 2015, neither of which sought to update the HMA definition.</p>	<p>Fylde Coast Strategic Housing Market Assessment – Blackpool Council, Fylde Council and Wyre Council (Turley Associates and Edge Analytics, 2014)</p>

3.36 The summary of previous evidence in this section strongly suggests that a standalone housing market area for the Central Lancashire area would represent a reasonable and effective option for the assessment of housing need. The next sub-section of this chapter will assess whether based upon up-to-date evidence the Central Lancashire area satisfies indicators identified within the PPG by reference to the supply and demand indicators of house price and housing search patterns.

d) Review of Criteria for Definition of the Housing Market Area

3.37 This section undertakes a review of the criteria identified within the PPG for the purpose of defining housing market area boundaries for the Central Lancashire area. Based on our summary of previous work and evidence from neighbouring areas this is focused upon reassessing the self-containment of the Central Lancashire area as a standalone Housing Market Area notwithstanding the links that do exist with adjoining authorities in terms of migration and commuting flows.

i) Housing Demand and Supply

3.38 Planning Practice Guidance recommends the analysis of house price data, including the rate of change in house prices, to assess the relationship between housing supply and demand across different areas. An objective of this analysis is to identify clear differences between price levels within an area and its surroundings.

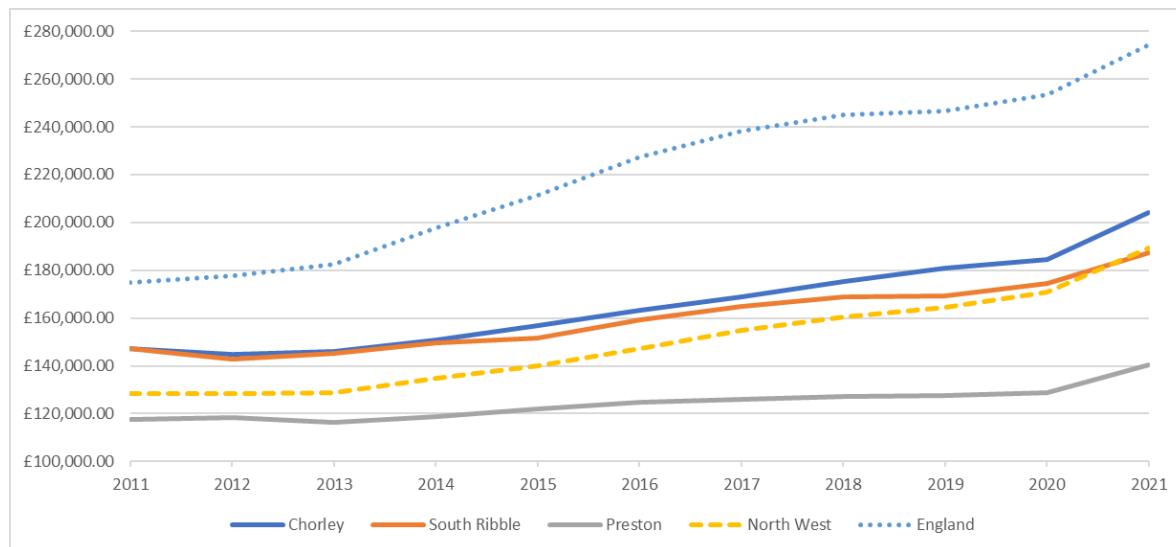
Comparison of Median Sales Price (All Dwellings)

3.39 The first stage is to look at differences from a comparison of median house sale prices at the Local Authority level. These data are available as part of House Price Index Statistics for small areas based on Office for National Statistics (ONS) analysis of Land Registry price-paid recorded transactions by administrative boundaries.

3.40 Figure 4 below provides a comparison of median sales price for all dwelling types for the

Central Lancashire authorities compared to the North West and England

Figure 4 Comparison of Median Sales Price (October 2011 – September 2021, All Dwellings)



Source: ONS; Land Registry; Edge Analysis

3.41 It can be seen that the median sales price in the three authorities falls quite significantly below that of England throughout the period 2011 to 2021. Average sale prices in Chorley and South Ribble are consistently higher than the average sale price in Preston, and this gap has widened in recent years as the median prices in South Ribble and to a greater extent Chorley have increased at a faster rate than median prices in Preston. Median sale prices in Preston also fall below the average for the North West, whilst prices in Chorley are consistently above the North West average. Average prices in South Ribble have recently dropped below the North West average for the first time since 2011.

Table 3 Median House Price Percentage Change – Central Lancashire Authorities

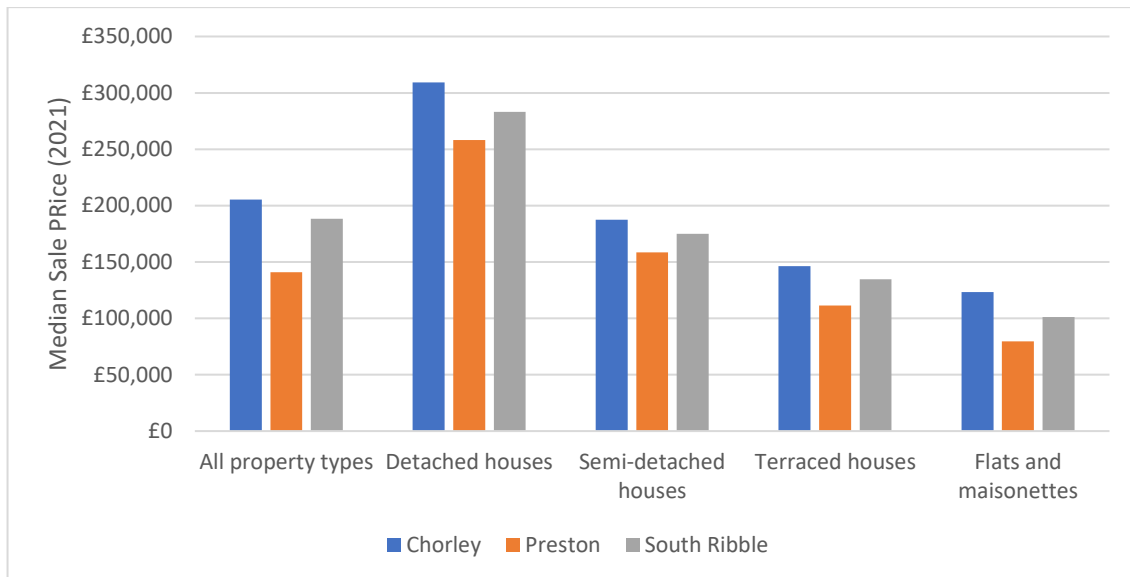
Local Authority Area	All Dwellings 2015 – 2020	New Build Dwellings Only 2015-2020
Chorley	17.7%	6.7%
Preston	5.6%	-8.5%
South Ribble	14.9%	22.5%

Source: ONS; Land Registry; SPRU Analysis

3.42 One further observation from these data is that when sales of ‘new build’ only dwellings are separated from the total series of transactions (as shown in Table 3 above) the trend in the rate of change in median prices is broadly reversed, with the greatest percentage increase identified in South Ribble and a decline in median ‘new build’ prices identified in Preston.

3.43 When considering median sales prices by individual dwelling type, as shown in Figure 5 below, this shows the comparatively higher median price in Chorley for all dwelling types, followed by South Ribble and then Preston, which has the lowest median sales price for all dwelling types.

Figure 5 Comparison of Median Sales Price by Dwelling Type (2021)

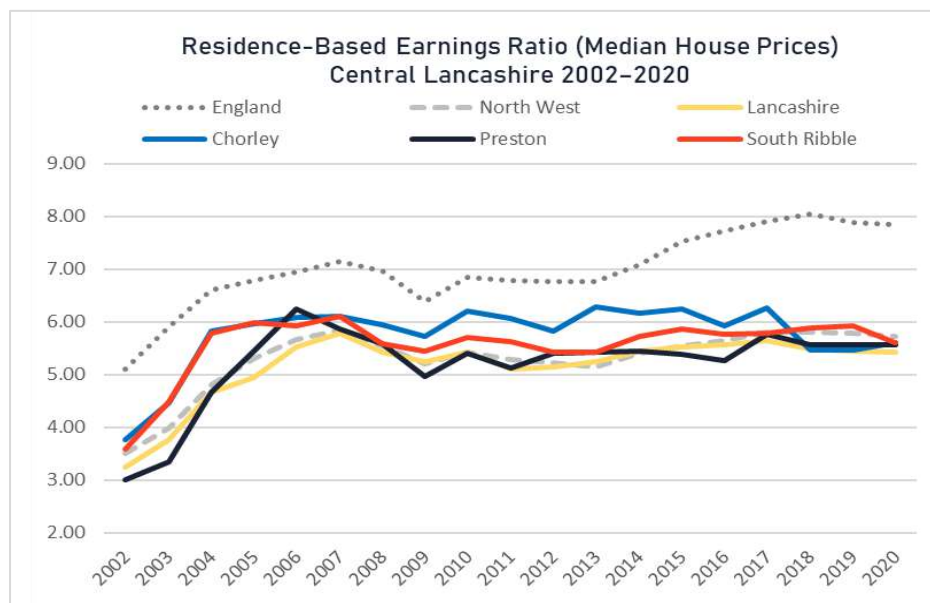


Source: Source: ONS; Land Registry; SPRU Analysis

Comparison of Affordability Ratios

3.44 Figure 6 below shows the ratio of median house prices to residence-based earnings in each of the Central Lancashire authorities compared with the equivalent regional and national figures. It is noted that England’s median values substantially exceed the equivalent value for all the Central Lancashire area and the North West. The three Central Lancashire authorities have a trend and values that do not deviate from each other too greatly, indicating similar levels of affordability.

Figure 6 Comparison of Affordability Ratios in Central Lancashire authorities



Source: ONS; Land Registry; Edge Analysis

3.45 While house price and affordability data as an indicator for supply and demand provides one potential source of evidence shared housing market area characteristics between the Central Lancashire authorities these, in isolation, are not sufficient to make recommendations on the

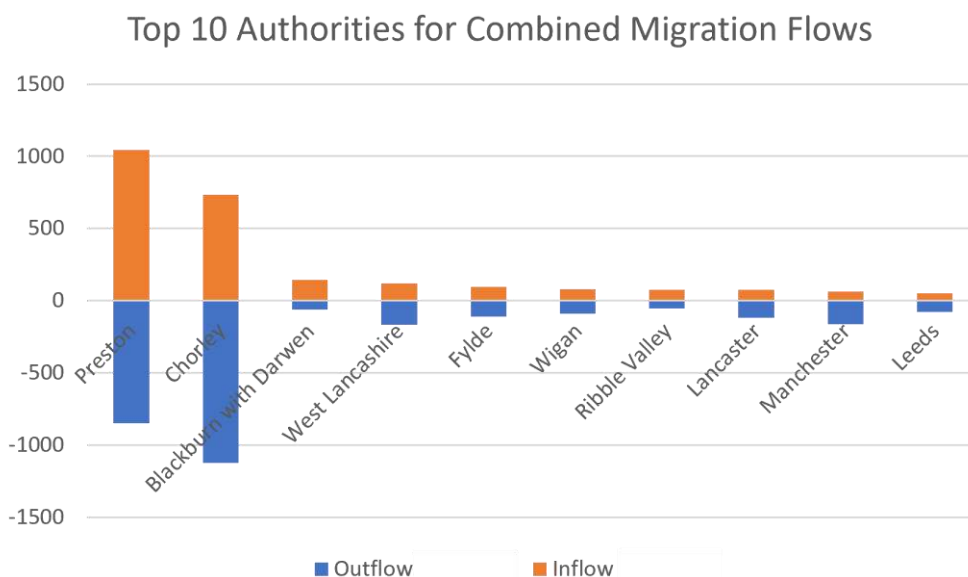
appropriate basis to assess housing needs. Further and potentially more significant criteria relating to migration flow and housing search patterns are set out in the following sub-section.

ii) Patterns of Housing Search and Migration Flows

- 3.46 Data from the 2011 Census for England and Wales is unchanged from the preparation of previous evidence seeking to identify housing market area geography in Central Lancashire. At the time of writing, migration flow data from the 2021 Census had not yet been published.
- 3.47 Data on change in usual residential address in the year before Census Day (i.e., 2010 to 2011) is the most useful for assessing supply-side and demand-side measures of self-containment based on household moves in accordance with the NPPG. This is because these data also capture moves within each of the three constituent Central Lancashire authorities. This is an important measure of containment in the housing market where a change in address is not associated with movement across administrative boundaries (but does represent containment of flows within Central Lancashire). Central Lancashire internal migration flows are further discussed in Section 4(iii) of this report in the context of assessing the demographic profile of the Housing Market Area.
- 3.48 In terms of origin-destination patterns of migration for movement between administrative geographies the 2011 Census data record the top 10 destinations and sources of inflow as follows based on the total combined movements. These data are presented separately for the three constituent Central Lancashire authorities.

South Ribble

Figure 7 Migration Links to South Ribble Based on 2010-11 Inflow and Outflow



Source: SPRU Analysis of 2011 Census Data

- 3.49 Figure 7 above does not include movements recorded within the South Ribble administrative area over the same period (4,666). This means the total of all movements recorded is 8,318. Internal movement within South Ribble represents some 56.1% of all demand-side moves and significantly exceeds cross-boundary moves with neighbouring authorities. Table 4 below shows the total percentage split of all internal moves and inflow to South Ribble, as a percentage of total moves.

Table 4 South Ribble – Breakdown of Internal Migration Flows and Inflow Migration

	Internal Flows and Inflow	%
South Ribble	4,666	56.1%
Preston	1,045	12.6%
Chorley	732	8.8%
Blackburn with Darwen	143	1.7%
West Lancashire	122	1.5%
Fylde	96	1.2%
Wigan	79	0.9%
Lancaster	74	0.9%
Ribble Valley	74	0.9%
Manchester	64	0.8%
Other Areas	1,223	14.7%
Total Moves	8,318	

Source: 2011 Census; SPRU Analysis

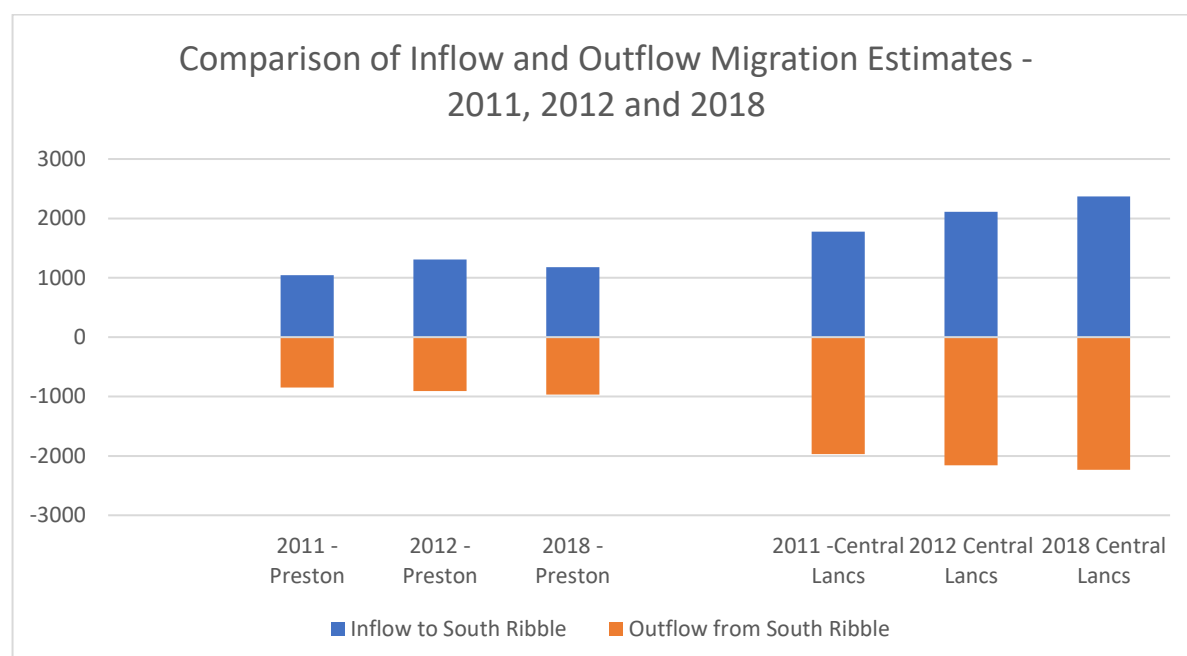
- 3.50 Figure 7 also shows that South Ribble has a materially greater outflow than inflow (a difference of -303 persons across the nine authorities assessed). Relatively significant inflow from Preston runs counter to the overall trend, with the most significant (and very substantial) net outflow (-391 persons) occurring south towards Chorley and to a lesser extent Manchester.
- 3.51 Combined inflows from Preston and Chorley comprise over 50% of all internal in-migration from outside of the administrative boundaries of South Ribble and no other individual authority comprises more than 2% of migration flows.
- 3.52 To provide updated analysis within this Report the most recent estimates for annual internal migration between local authorities have been compiled as part of the components of change published alongside Annual Mid-Year Population Estimates (MYPEs). The downside of these data is that they do not capture an annual estimate of person movements within administrative boundaries for which the 2011 Census remains the most comprehensive source.
- 3.53 It must be stated that the methodology for production of annual Mid-Year Population Estimates is different from the 2011 Census that seeks details of previous residential address in the year before the Census. This means that a degree of caution should be exercised with direct comparison of the data.
- 3.54 Figure 8 below presents inflow and outflow data for 2011, 2012 and 2018. Presenting data for 2011 and 2012 as consecutive years allows potential differences between the methodology for the Census and Mid-Year Population Estimates to be compared. It is also relevant to note as per Table 5 below, which compares internal migration as recorded in the 2011 Census and 2011 Mid-Year Population Estimates (using the example of South Ribble) the position of net outflow is slightly lower using data from the mid-year estimates. This comprises a combination of higher net inflow from Preston and lower net outflow to Chorley. The mid-year estimates also record a higher total in terms of movements.

Table 5 Comparison of Internal Migration Estimates – 2011 Census and Mid-Year Population Estimates (MYPEs)

	Inflow	Outflow	Net Flow
2011 Census – South Ribble and other Central Lancashire authorities	1,777	1,970	-193
2011 MYPE - South Ribble and other Central Lancashire authorities	1,863	1,921	-58

3.55 Analysis of the most recent estimates of internal migration flows has been conducted on the basis of the previous evidence of the strongest links to Preston and the combined Central Lancashire authorities. This is based on the previous history of research into sub-regional housing market links.

Figure 8 South Ribble - Estimates of Internal Migration Flows with Preston and combined Central Lancashire



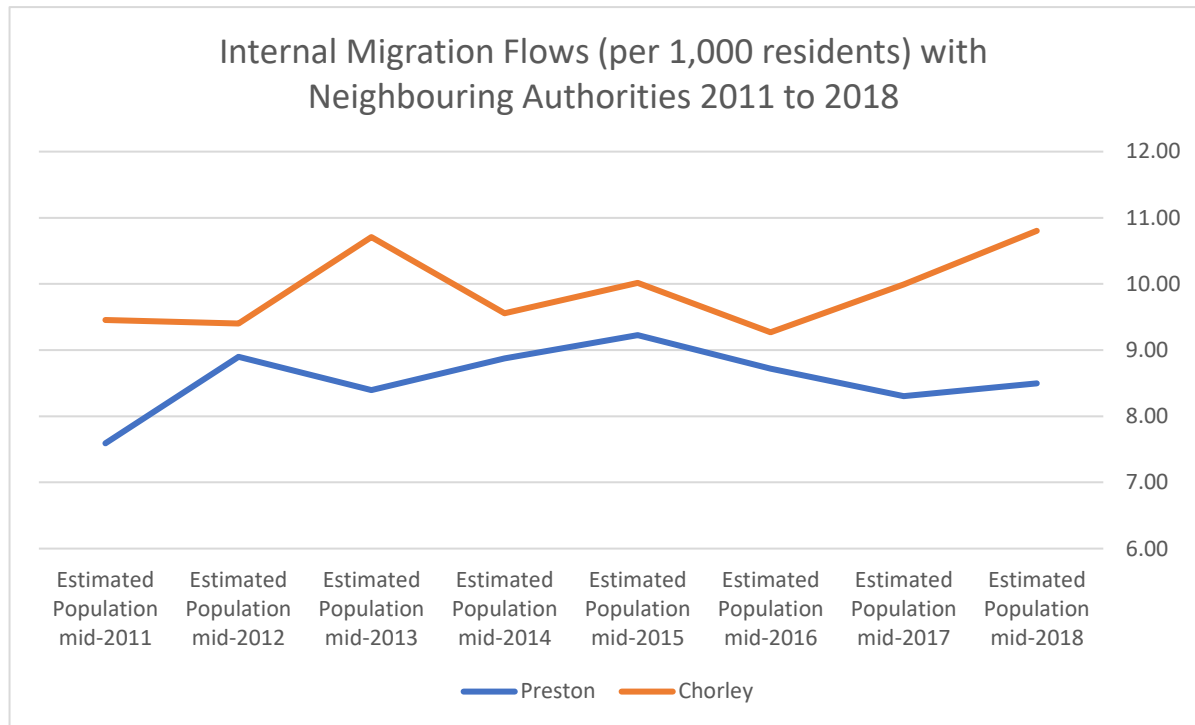
Source: 2011 Census; ONS Mid-Year Population Estimates; SPRU Analysis

3.56 These data reveal that there has been an increase in South Ribble’s internal migration flows with the other constituent Central Lancashire authorities over the years since the 2011 Census. Annual gross outflow from South Ribble has increased above 2011 Census levels (-1,970 persons vs -2,232 persons) comprising increased movements towards both Preston and Chorley. Annual gross inflow has increased more substantially, particularly driven by movements related to Chorley.

3.57 The increased gross flows during this period must take account of population growth between the 2011 Census and the most recent estimates of population. To do this one can consider the actual rate of movement per 1,000 residents as this accounts for changes in total population. This measure shows gross flows between the other constituent Central Lancashire authorities and South Ribble have increased slightly from 10.50 moves per 1,000 residents to 12.46 moves per 1,000 residents between 2011 and 2018. This indicates that the strength of links based on supply-side or demand-side indicators of migration has increased above the rate of population change over the same period.

3.58 While this analysis has focused on the beginning and end of the 2011 to 2018 series it is relevant to note trends calculated on this basis have fluctuated over the period, as shown in Figure 9 below but have consistently exceeded standardised flows measured against 2011 data.

Figure 9 Comparison of Standardised Internal Migration Flows



Source: 2011 Census; ONS Mid-Year Population Estimates; SPRU Analysis

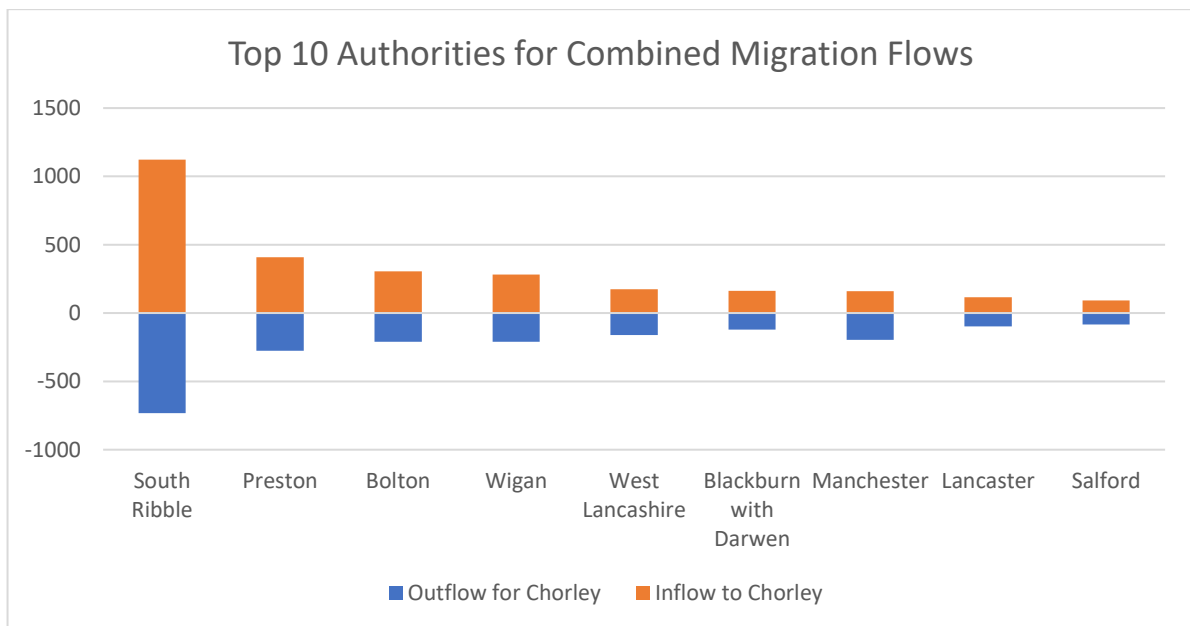
3.59 One observation of potential demand-side and supply-side migration links between South Ribble and the other constituent Central Lancashire authorities relates to differences in population change between the authorities when comparing the change in gross inflow and outflow. The data support the conclusion that a variety of factors may have acted to suppress total migration flows in the Census year and the immediate surrounding period. In the case of South Ribble gross outflows are recorded as increasing by around 14% between 2011 and 2018, despite only 1.5% population growth over the same period. This suggests the potential role of other 'push' (or supply-side) factors leading to increased out-migration.

3.60 Gross inflow is recorded as showing a more significant increase between 2011 and 2018 (+33%) although flows have fluctuated. This may be partly explained by higher rates of population growth elsewhere in Central Lancashire (in particular, Chorley: 9% 2011-2018 and to a lesser extent Preston: 2.2%) but also indicates potential 'pull' factors contributing to demand-side migration flows in excess of 2011 levels.

Chorley

3.61 The same analysis for Chorley echoes in reverse the very strong migration links with South Ribble, comprising around one-third of all gross inflow and 12.4% of total flows including movement within the Chorley administrative boundary. Figure 10 also reflects that Chorley experienced significant net population gain through internal migration links with the nine authorities assessed (+735 persons of which around 53% comprises net flows with South Ribble). Only Manchester generates a small net outflow of residents from Chorley.

Figure 10 Migration Links to Chorley Based on 2010-11 Inflow and Outflow



Source: 2011 Census; ONS Mid-Year Population Estimates; SPRU Analysis

3.62 Figure 10 above does not include movements recorded within the Chorley administrative area over the same period (5,313). This means the total of all movements recorded is 9,074. Internal movement within Chorley represents some 58.6% of all demand-side moves and significantly exceeds cross-boundary moves with neighbouring authorities. Table 6 below shows the total percentage split of all internal moves and inflow to Chorley, as a % of total moves.

Table 6 Chorley – Breakdown of Internal Migration Flows and Inflow Migration

	Internal Flows and Inflow	%
Chorley	5,313	58.6%
South Ribble	1,123	12.4%
Preston	408	4.5%
Bolton	306	3.4%
Wigan	282	3.1%
West Lancashire	174	1.9%
Blackburn with Darwen	163	1.8%
Manchester	161	1.8%
Lancaster	115	1.3%
Salford	93	1.0%
Other Areas	936	10.3%
Total Moves	9,074	

Source: 2011 Census; SPRU Analysis

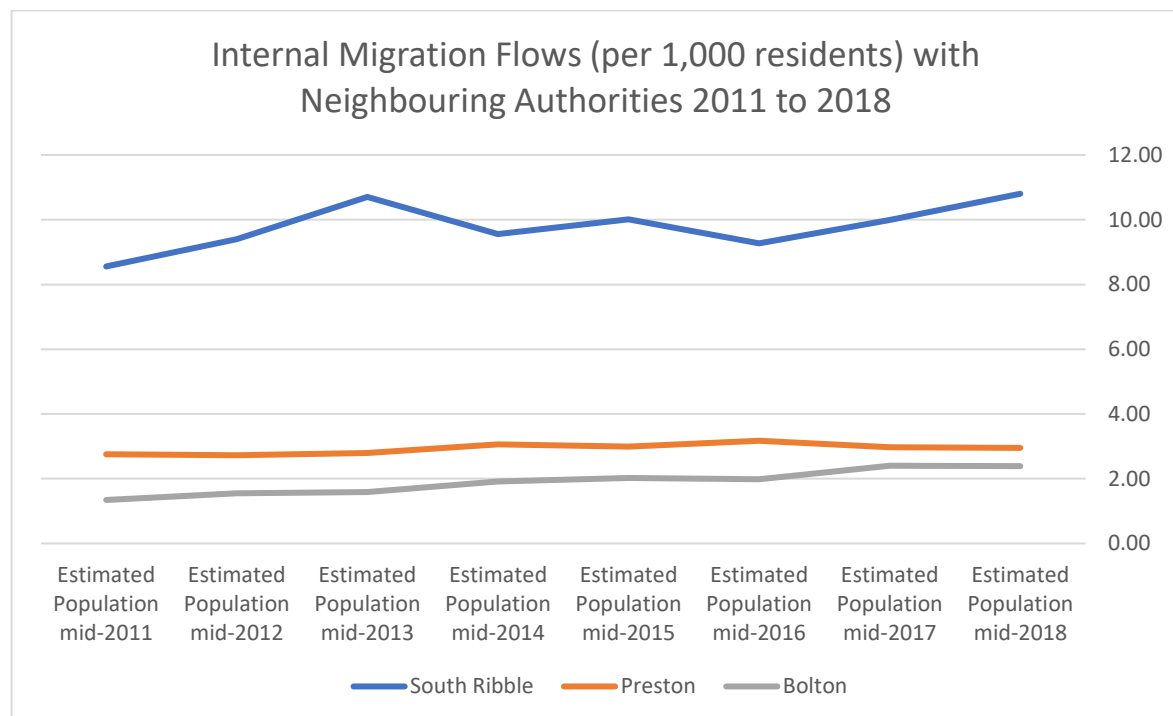
3.63 Combined inflows from Preston and South Ribble comprise around 40% of all internal in-migration from outside of the administrative boundaries of Chorley. Only Preston exceeds 4% of total inflows, with Bolton and Wigan comprising between 3 and 4% of flows and all other individual authorities comprising fewer than 2% of migration flows.

3.64 Analysis undertaken by the ONS on internal migration flows between 2011 and 2014 found

that only inflows from Preston, Bolton and South Ribble may be regarded as statistically significant, whereas only South Ribble generates statistically significant outflows between these dates.

- 3.65 Figure 11 below shows the same evidence of strengthening demand-side and supply-side links between Chorley and South Ribble between 2011 and 2018. Also shown are standardised rates of migration between Preston and Chorley, which have essentially been stable in-line with the population growth in both authorities. This is in contrast to standardised migration flows with more distant locations including Manchester and Lancaster, which both record fewer than one gross movement per 1,000 residents and that have weakened slightly against the standardised measure since 2011.
- 3.66 Standardised flows with Bolton show some strengthening between 2011 and 2018, principally as a result of demand-side changes (i.e., increased gross inflow from Bolton to Chorley). This indicates that two-way flows have not changed substantially, and outflow from Chorley to Bolton cannot be regarded as statistically significant.

Figure 11 Comparison of Standardised Internal Migration Flows

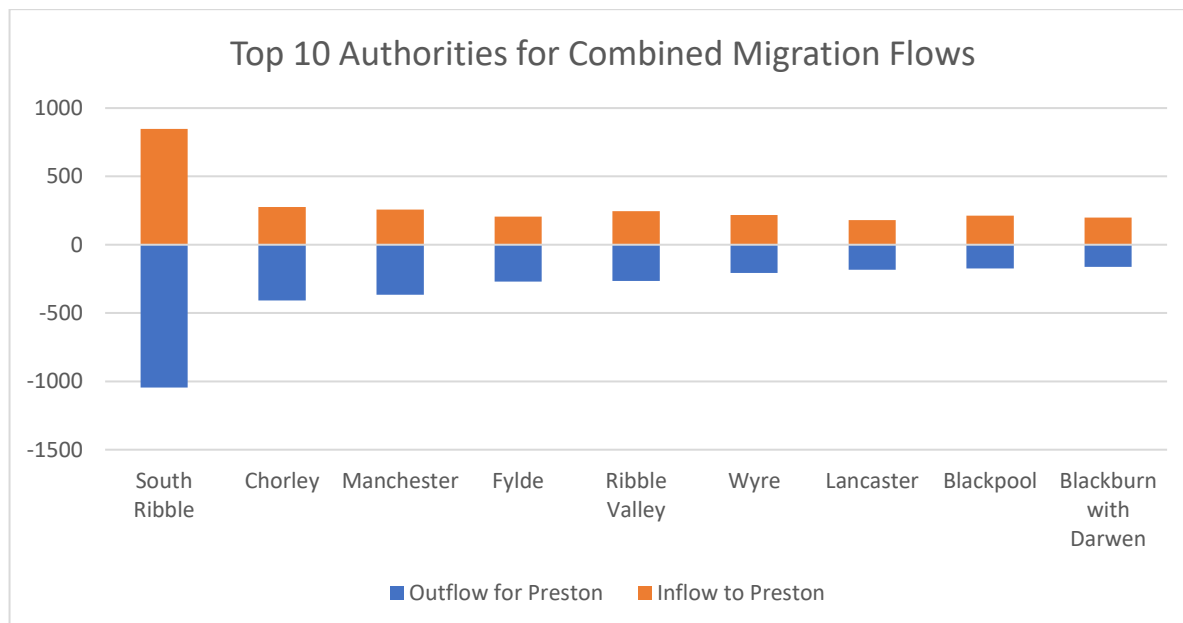


Source: 2011 Census; ONS Mid-Year Population Estimates; SPRU Analysis

Preston

- 3.67 Preston demonstrates statistically significant inflows with a wider range of neighbouring authorities as a result of its urban characteristics and status as a centre for higher education. This is not, however, reflected in the characteristics of out-migration where a substantially more uneven pattern emerges and previous ONS research has concluded that only outflow to South Ribble comprised a statistically significant total between 2011 and 2014.
- 3.68 Figure 12 reflects that Preston experienced a net outflow of migration through internal migration links with the nine authorities assessed (-441 persons which includes net outflow with South Ribble of -198 persons). Outflow to South Ribble comprises around one-third of total outflows from the nine authorities assessed with the second highest total comprising Chorley (-405 persons).

Figure 12 Migration Links to Preston Based on 2010-11 Inflow and Outflow



Source: 2011 Census; ONS Mid-Year Population Estimates; SPRU Analysis

- 3.69 Figure 12 above does not include movements recorded within the Preston administrative area over the same period (11,378). This means the total of all movements recorded is 18,924. Internal movement within Preston represents around 60% of all demand-side moves and significantly exceeds cross-boundary moves with neighbouring authorities.
- 3.70 Table 7 below shows the total percentage split of all internal moves and inflow to Preston, as a % of total moves. South Ribble comprises the only internal migration flow exceeding 4% of total movements but in practice represents only 11% of inflow from outside of the administrative boundary. Combined inflows from Chorley and South Ribble comprise around only 15% of all internal in-migration from outside of the administrative boundaries of Preston.
- 3.71 A notable feature is that flows are significantly more widely dispersed from outside of the nine other authorities assessed (around 26% compared with 14% in South Ribble and 10% for Chorley).

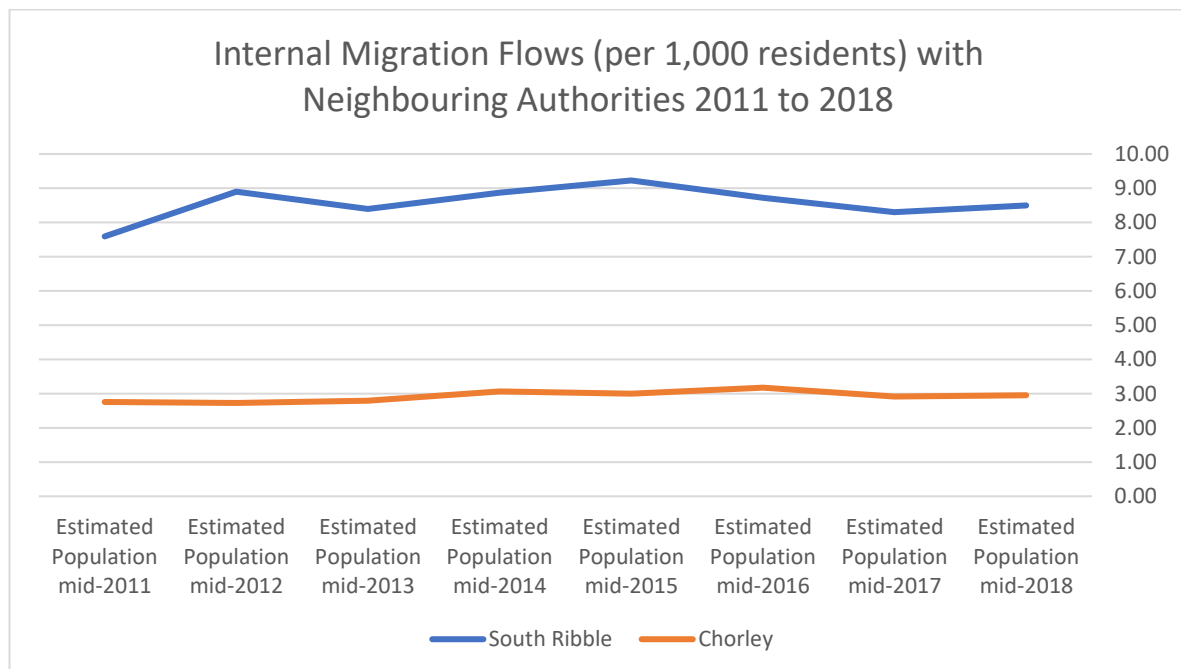
Table 7 Preston – Breakdown of Internal Migration Flows and Inflow Migration

	Internal Flows and Inflow	%
Preston	11,378	60.1%
South Ribble	847	4.5%
Chorley	275	1.5%
Manchester	257	1.4%
Ribble Valley	246	1.3%
Wyre	217	1.1%
Blackpool	213	1.1%
Fylde	206	1.1%
Blackburn with Darwen	199	1.1%
Lancaster	179	0.9%
Other Areas	4,907	25.9%
Total Moves	18,924	

Source: 2011 Census; SPRU Analysis

3.72 Figure 13 below shows that in terms of the relationship between the strength of demand-side and supply-side links between Preston and South Ribble or Preston and Chorley there has been very little change since 2011 when these are measured against standardised flows.

Figure 13 Comparison of Standardised Internal Migration Flows between Preston and South Ribble, and Preston and Chorley



Source: 2011 Census; ONS Mid-Year Population Estimates; SPRU Analysis

3.73 Broadly any changes relate to increased outflow from Preston to neighbouring South Ribble and Chorley. This is likely to relate to supply-side pressures in terms of housing search patterns and an increase in outflow from Preston aligned to population growth amongst younger age groups and thus some relative strengthening of these links. Patterns of inflow from the other constituent Central Lancashire authorities have been more stable, which is likely to reflect the wider range of authorities from which inflow to Preston is typically drawn

and are thus unlikely to reflect any change to the significance of links recorded in 2011 data based on trends in local search patterns.

iii) Overall Self-Containment of Migration Flows

3.74 Table 8 below replicates analysis based on migration flows into and out of Central Lancashire in the year before the 2011 Census. This shows that when the districts are assessed as a single housing market area, based on flows occurring wholly within the district as a proportion of total movements, levels of self-containment broadly satisfy the 70% threshold identified in earlier iterations of guidance.

Table 8 Self-Containment Rates – Household Moves within Central Lancashire (England and Wales Total)

Previous Address (origin) ('supply')				Rest of England and Wales (outflow)	Total (previous year – moves in)
Usual Residence – 2011 Census (destination) ('demand')	Chorley	Preston	South Ribble		
Chorley	5,313	408	1,123	3,123	9,967
Preston	275	11,378	847	6,203	18,703
South Ribble	732	1,045	4,666	1,827	8,270
Rest of England and Wales (outflow)	3,153	5,229	2,357		
Total (previous year – moves out)	9,473	18,060	8,993		
Self-Containment	Contained moves	All Moves	% Containment		
Demand-side (destination-based)	25,787	36,940	69.8%		
Supply-side (origin-based)	25,787	36,526	70.6%		
Overall (combined flows ⁷)	51,574	73,466	70.2%		

Source: SPRU analysis of ONS data

3.75 Analysis based on totals for England and Wales will capture a significant proportion of household moves that would not be considered short household movements in accordance with the most recent planning practice guidance. It is therefore relevant to consider the appropriate definition of short household moves in the context of Central Lancashire. In assessing this definition, Figure 3 above denotes that the Central Lancashire authorities only share administrative boundaries with other administrative geographies forming part of the North West region.

3.76 There is no definition of short household moves, but previous guidance published by the Planning Advisory Service in its 'Objectively Assessed Housing Need and Housing Targets' Technical Advice Note (2nd edition) stated unless an authority adjoined or was close to boundaries with neighbouring countries or regions these should probably be excluded. In the case of Central Lancashire, it appears reasonable to use this as the basis for a definition of short household moves.

3.77 Despite relatively high levels of self-containment on the basis of the Central Lancashire boundary (i.e., 70.2% overall from Table 8 above), just 11.5% of all other flows in England

⁷ For change of address within an individual administrative area origin-destination flows are counted twice as part of the combined total.

and Wales are to locations in the North West.

- 3.78 When analysis is undertaken of household moves within Central Lancashire as a percentage of combined flows within the North West region only, the figure for self-containment increases to 78.9%. This clearly satisfies the criteria for a relatively high proportion of moves as set out in the most recent version of the PPG and substantially exceeds the indicative threshold of 70% derived from earlier guidance and best practice. The results are set out in Table 9 below.

Table 9 Self-Containment Rates – Household Moves within Central Lancashire (North West Total)

Previous Address (origin) ('supply')				Rest of North West Region	Total (previous year – moves in)
Usual Residence – 2011 Census (destination) ('demand')	Chorley	Preston	South Ribble		
Chorley	5,313	408	1,123	2230	9,074
Preston	275	11,378	847	3781	16,281
South Ribble	732	1,045	4,666	1245	7,688
Rest of North West Region	1,990	3,089	1,431		
Total (previous year – moves out)	8,310	15,920	8,067		
Self-Containment	Contained moves	All Moves	% Containment		
Demand-side (destination-based)	25,787	33,043	78.0%		
Supply-side (origin-based)	25,787	32,297	79.8%		
Overall (combined flows ⁸)	51,574	65,340	78.9%		

Source: SPRU analysis of ONS data

- 3.79 This analysis further supports the definition of Central Lancashire as a self-contained Housing Market Area. When considered alongside the other criteria used to support identification of housing market geographies and the understanding of links with surrounding areas it is not considered that changes to self-containment where Central Lancashire is grouped with other neighbouring areas supports the definition of a wider HMA.
- 3.80 The analysis of housing search patterns therefore supports the identification of Central Lancashire as a self-contained housing market area.

e) Conclusions and Recommendations on the Housing Market Area

- 3.81 This section has addressed the relevant steps and considered evidence recommended by national and policy and guidance in order to support conclusions on the appropriate definition of the HMA. The outputs of this exercise define the administrative boundaries of the three Central Lancashire authorities as the most appropriate geography within which to prepare policies for meeting housing need.
- 3.82 The findings following this exercise support the definition of Central Lancashire as a self-contained HMA. This conclusion is consistent with the outcomes of previous work but has been prepared with reference to more recent data and considered against the current criteria outlined within the Planning Practice Guidance.

⁸ For change of address within an individual administrative area origin-destination flows are counted twice as part of the combined total

- 3.83 The most comprehensive available evidence to inform definition of the HMA boundary is obtained from the 2011 Census for England and Wales. All previous work taking this evidence into account has identified Central Lancashire as a self-contained HMA. Compared with previous Census data the 2011 outputs reinforce the view that links with the surrounding North West authorities are insufficiently strong to support definition of a broader HMA.
- 3.84 The current Planning Practice Guidance also assists in allowing a finer-grained definition of short household moves and judgement regarding the definition of what comprises a relatively high proportion of totals flows. Having undertaken the assessment on this basis, rather than against strict and potentially arbitrary numerical thresholds as set out in earlier iterations of guidance, the robustness of conclusions relating to Central Lancashire as a self-contained HMA are reinforced.
- 3.85 More recent evidence in relation to migration flow and housing search patterns has established that trends in house prices within Central Lancashire remain distinct from those in immediately adjoining authorities, notwithstanding high recent levels of housebuilding.
- 3.86 A comprehensive approach has been adopted to evaluate the strength of housing market links and the degree of change indicated by the most recent evidence. This exercise has established that individual indicators, such as relatively greater similarity in house prices or increases in the absolute number of estimated of person movements, should not be considered in isolation.
- 3.87 This view is consistent with the recent findings of evidence produced by neighbouring authorities, none of which supports the definition of a broader HMA incorporating Central Lancashire.
- 3.88 The remainder of this report will therefore set out findings on the basis of a standalone Central Lancashire HMA.

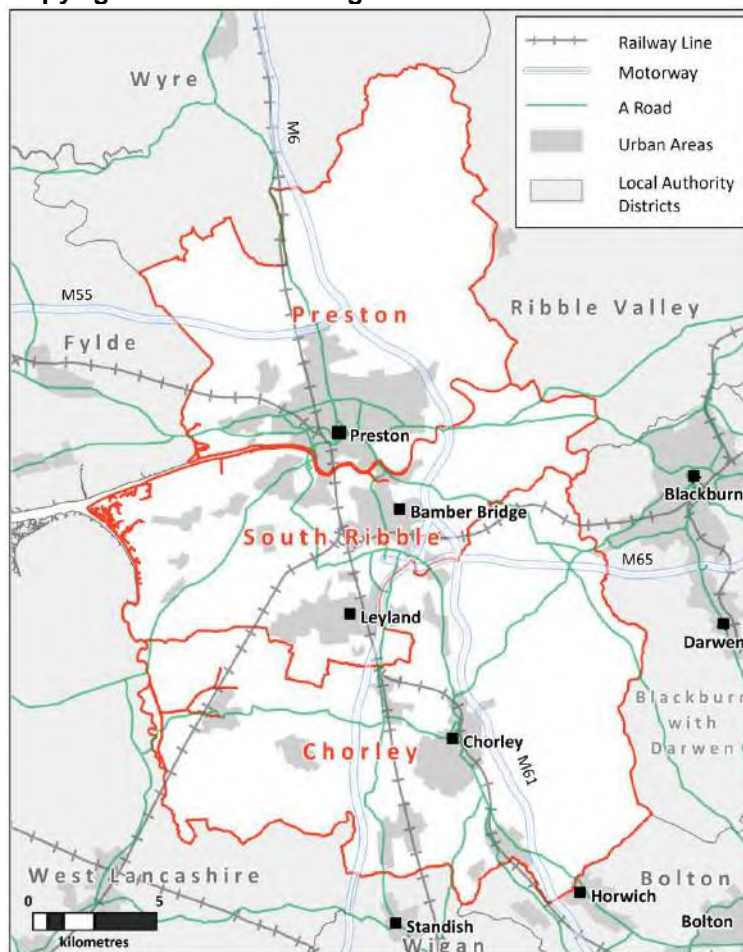
4.0 DEMOGRAPHIC PROFILE

4.1 This section provides an overview of the current demographic profile of the constituent Central Lancashire Authorities and the plan area as a whole, including reflecting recent trends in components of population change. This section also compares differences in the official subnational population and household projections for the Central Lancashire Authorities, and the extent to which the 2014-based projections used as an input to the Standard Method reflect recent evidence.

a) Population Change

4.2 The joint planning area of Central Lancashire covers the three local authority districts of Preston, South Ribble, and Chorley (Figure 14). ONS mid-year population estimates (MYE) show that as of mid-year 2020, the population of Central Lancashire was 374,103 persons. Preston has the largest population, at 144,147 (38% of the Central Lancashire total), followed by Chorley with 118,870 people (32%), and South Ribble, which has a population of 111,086 (30%).⁹

Figure 14 Central Lancashire districts and surrounding areas. Contains OS Data © Crown Copyright and database rights 2022.

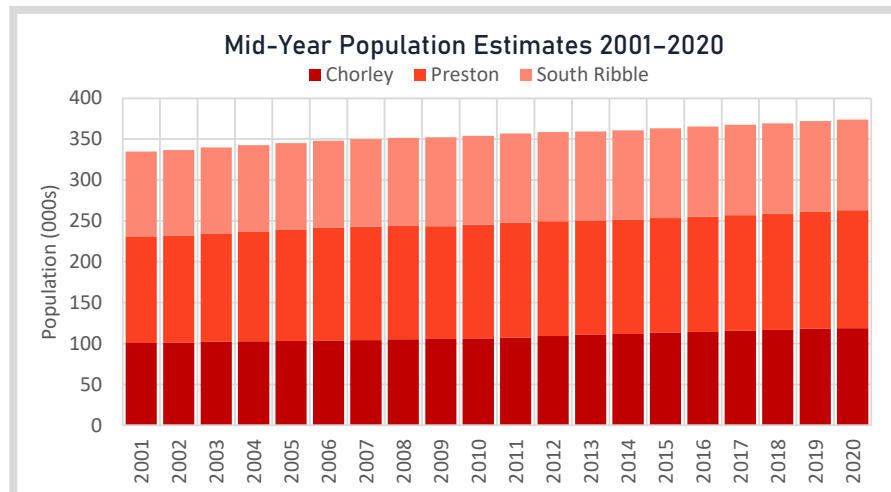


4.3 The population of Central Lancashire has grown by 11.7% since 2001, an increase of 39,223 people (Table 10). Chorley has seen the greatest increase in the size of its population, with an average growth rate of 0.88% per year between 2001 and 2020, compared to 0.53% per

⁹ ONS Population estimates for the UK, England and Wales, Scotland and Northern Ireland: mid-2020

year in Preston, and 0.35% per year in South Ribble.

Figure 15 Central Lancashire – Mid-year population estimates, 2001–2020



Source: ONS

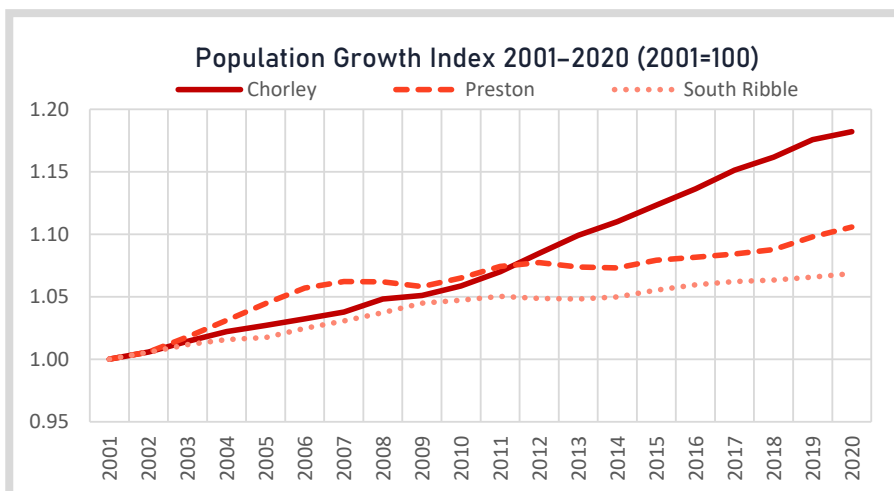
Table 10 Population growth, 2001–2020

District	Population 2001	Population 2020	Change	% Change	As a proportion of Central Lancs. growth
Chorley	100,559	118,870	18,311	18.2%	46.7%
Preston	130,372	144,147	13,775	10.6%	35.1%
South Ribble	103,949	111,086	7,137	6.9%	18.2%
Central Lancs.	334,880	374,103	39,223	11.7%	100%

Source: ONS MYEs

4.4 In Chorley and South Ribble, the population growth rates were similar up to 2009. Since then, the rate of population growth in Chorley has increased but remained relatively low in South Ribble (Figure 16). In Preston, the rate of growth has fluctuated, with more rapid growth seen between 2001 and 2006 and in the most recent years of the series from 2018.

Figure 16 Central Lancashire - Population growth profile, 2001/02–2019/20

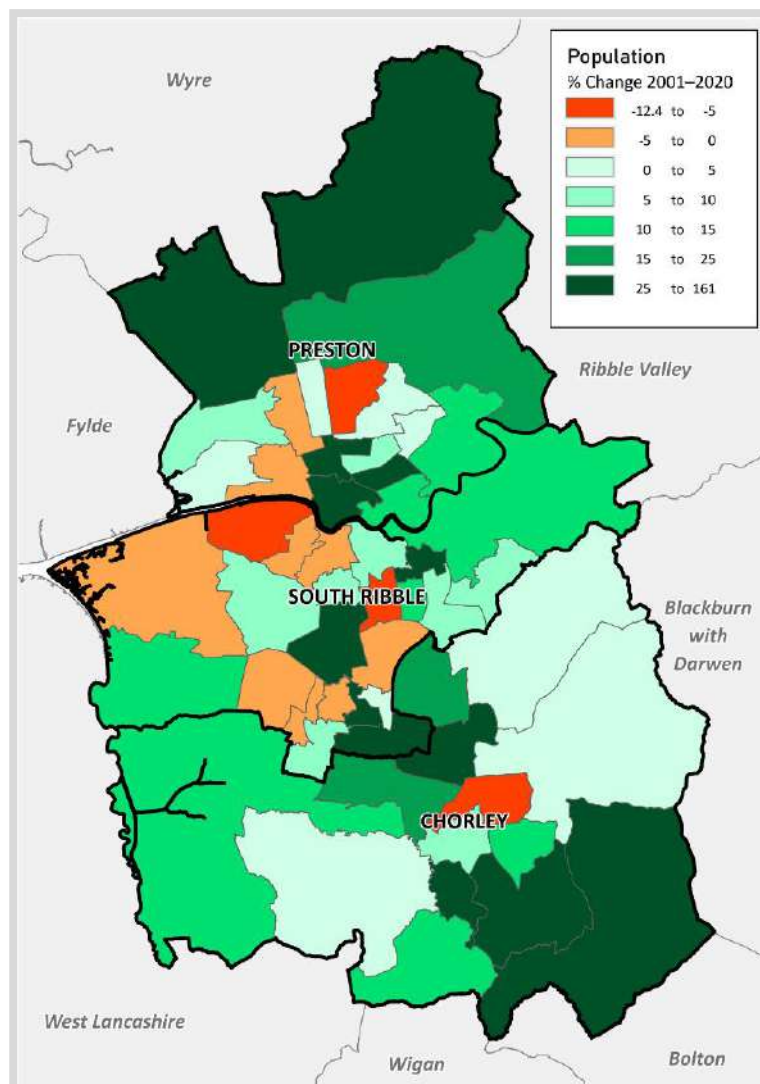


Source: ONS

- 4.5 These overall population increases at district-level mask the pattern of population growth and decline at a sub-district level. Figure 17 illustrates ward-level population change from 2001 to 2020.¹⁰ The highest level of population growth has been in Buckshaw and Whittle ward in Chorley, which has seen population increase by 161%, equivalent to an additional 5,500 people. The neighbouring ward of Buckshaw and Worden, over the border in South Ribble, has seen the next highest level of growth; in this ward the size of the population has nearly doubled since 2001.
- 4.6 Negative population change has been seen in 9 wards in South Ribble, particularly in the ward of Howick and Priory, which has seen population decline of approximately 7% (a loss of 540 people). However, across all of Central Lancashire, the ward of Sharoe Green in Preston has seen the greatest loss since 2001 at -12.4%, a reduction of 1,091 people.

¹⁰ [ONS Ward-level Population Estimates](#)

Figure 17 Population change (%) by ward, 2001–2020

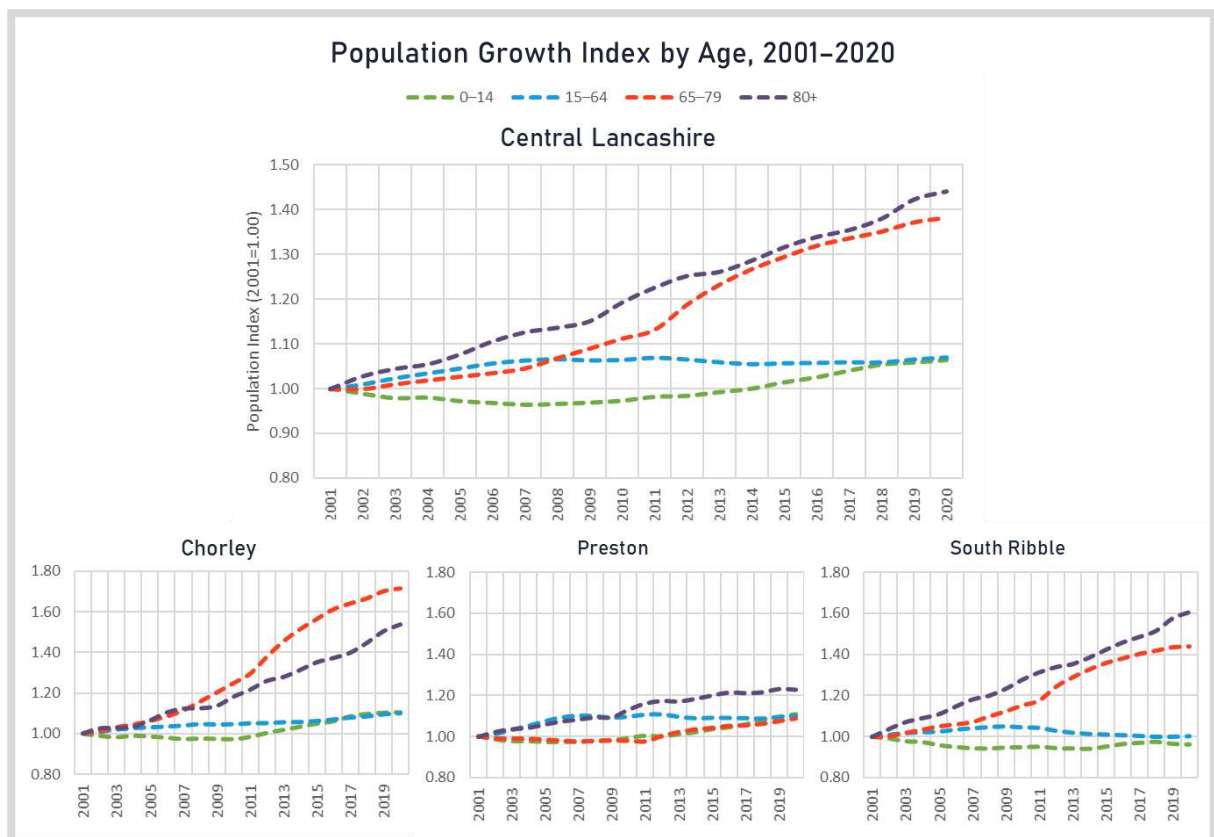


Source: ONS ward-level population estimates
Contains OS Data © Crown Copyright and database rights 2022.

i) Population Age Profile

- 4.7 The Central Lancashire population has seen largest growth in the older 65+ age group (Figure 18), with an increase of 40% since 2001, equivalent to approximately 20,000 additional people. At the same time, the size of the working age (15–64) population has increased by only 7%, equivalent to 15,500 additional people. This population ageing, which has accelerated since 2009, is an inevitable feature of population change across the UK, as the larger birth cohorts of the post-war period move into the retirement ages.
- 4.8 The aggregate picture hides the differences that exist between the individual local authorities. Preston has a more ‘youthful’ population than South Ribble and Chorley. Chorley and Preston have seen comparable growth rates in the 0–64 age groups, but growth in the older 65+ age groups has been considerably higher in Chorley. In South Ribble, there has been a slight decline in the size of the 0–64 population and, like with Chorley, considerable growth in the older 65+ age groups.

Figure 18 Central Lancashire - Population growth index by age group, 2001–2020



Source: ONS

4.9 Preston’s more youthful population age profile is emphasised by the Old Age Dependency (OAD) ratios for the three authorities (the OAD is the proportion of the population aged 65+ relative to the population aged 15–64). In Preston, this figure has remained the same since 2001, whereas both Chorley and South Ribble have seen considerable increases (Table 11). Preston also has a lower median age compared to the England average (35 versus 40); Chorley and South Ribble are higher than the England average, at 43 and 45 respectively.

Table 11 Population age profile characteristics by district, 2001 and 2020

Indicator	Chorley		Preston		South Ribble		England	
	2001	2020	2001	2020	2001	2020	2001	2020
Percentage 65+	14%	20%	15%	15%	16%	22%	16%	19%
Percentage 80+	4%	5%	4%	4%	4%	6%	4%	5%
Old age dependency ratio	21	32	22	22	24	35	24	29
Median age	39	43	35	35	39	45	38	40

Source: ONS. Note: Old Age Dependency Ratio is the proportion of the population aged 65+ relative to the population aged 15–64.

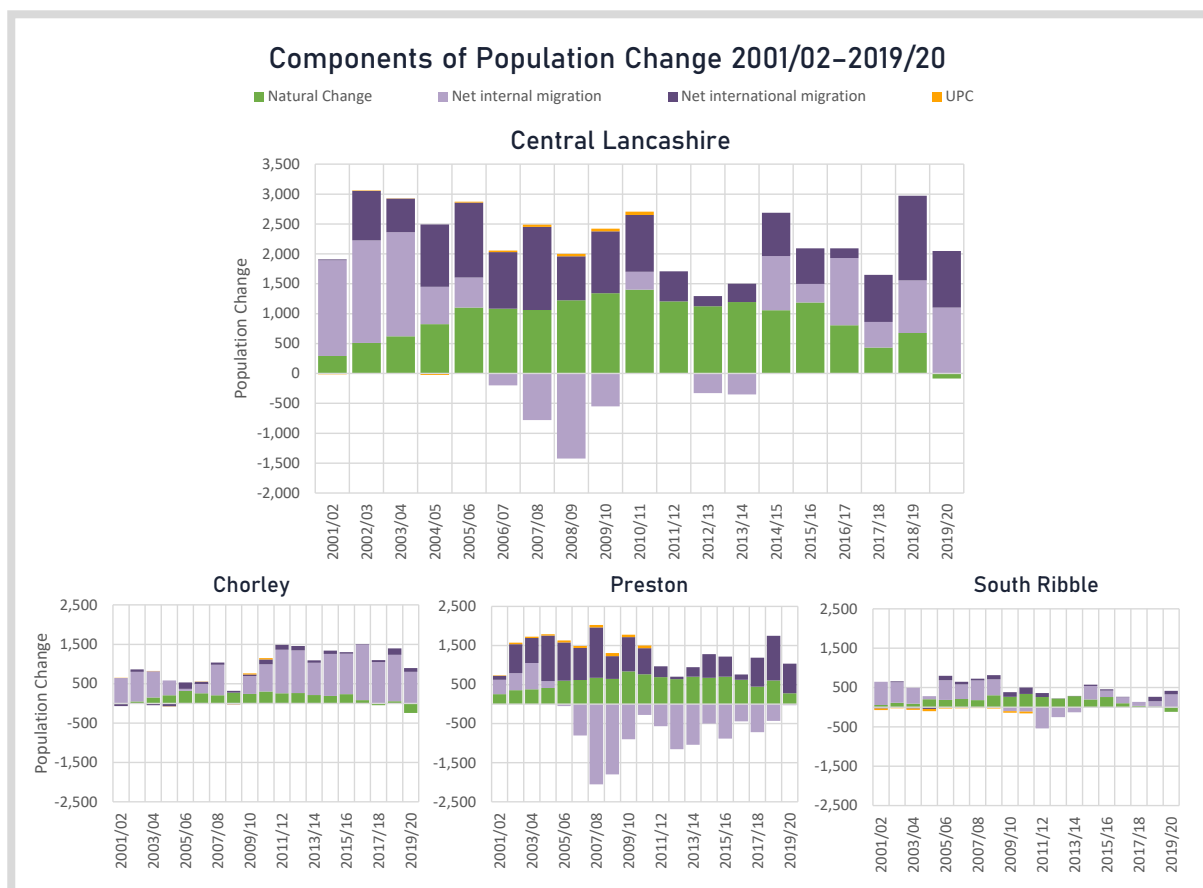
b) Drivers of Population Growth

i) Components of Change

4.10 Between successive Censuses, population estimation is necessary. Mid-year population estimates (MYEs) are derived by applying the ‘components of population change’ to the previous year’s MYE. These components of change are natural change (the balance between births and deaths), internal (domestic) migration, and international (overseas) migration.

4.11 Figure 19 presents an illustration of the components of change for Central Lancashire as a whole, as well as for the three constituent authorities, demonstrating the relative importance of each in driving historical population growth since 2001. Commentary on each of these components is provided below.

Figure 19 Components of change, 2001/02–2019/20



Source: ONS. Note: UPC refers to Unattributable Population Change¹¹

ii) Natural Change

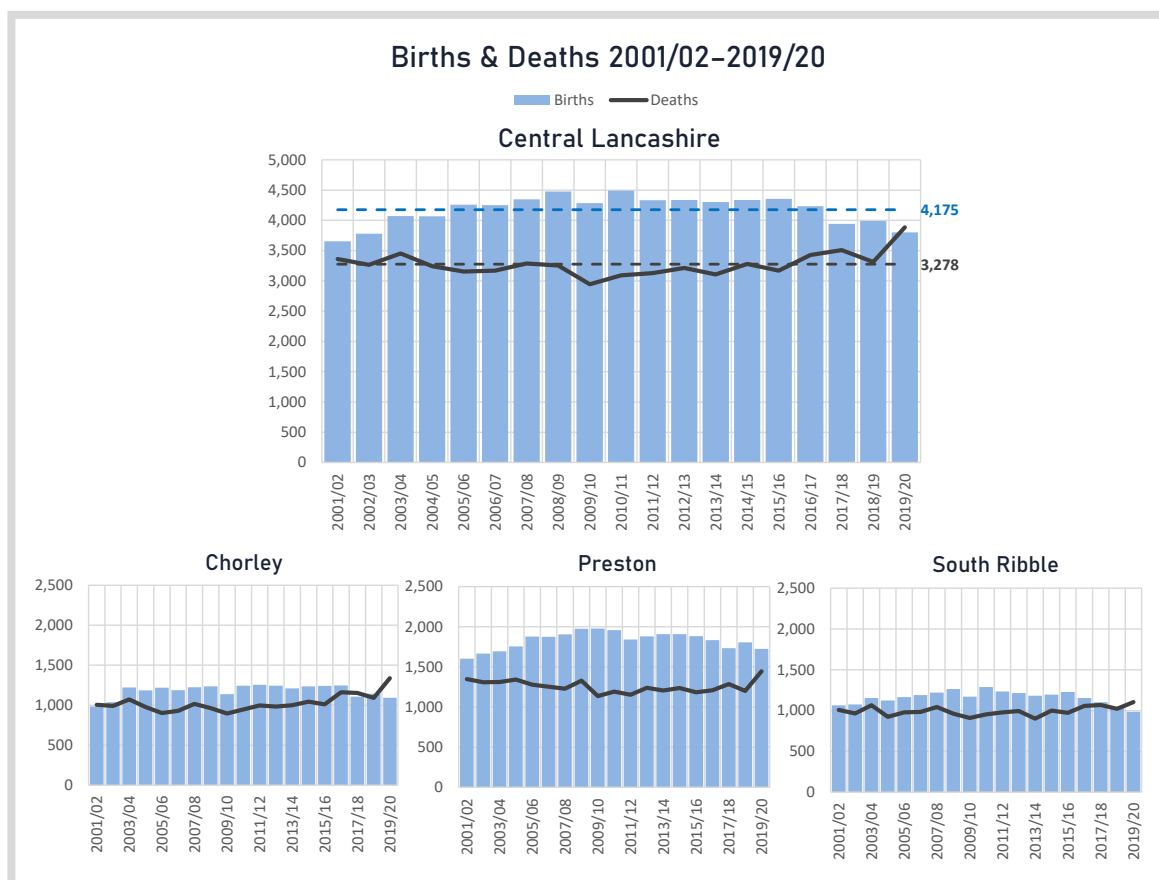
4.12 Until 2019/20, natural change had a positive impact upon annual population growth in Central Lancashire (see green bars in Figure 19), as the number of births exceeded the number of deaths (Figure 20). With its more youthful population profile, Preston has seen the highest level of population growth through natural change across the three authorities, with Chorley

¹¹ Following the 2011 Census, the 2002–2010 MYEs were rebased to align with the 2011 Census population count, with the adjustments referred to as ‘Unattributable Population Change’. ONS has not explicitly assigned the UPC adjustment to any one component of change, suggesting that UPC is likely due to issues around the estimation of international migration, internal migration, or the Census estimates themselves.

and South Ribble experiencing only small annual increases through natural change.

- 4.13 The number of births in Central Lancashire increased gradually from 2001/02, peaking at 4,492 in 2010/11. Since then, the number of births has begun to reduce, with numbers in the last 3 years below the long-term average of 4,175 per year (Figure 20).
- 4.14 Deaths have showed less variation, fluctuating around the long-term average of 3,278 per year. However, in 2019/20, there was a recorded uptick in the number of deaths, reflecting the impact of the first wave of the Covid-19 pandemic. For the UK as a whole, the year to mid-2020 saw the highest number of deaths since the year to mid-1986.¹² In this most recent year, the number of deaths exceeded the number of births in both Chorley and South Ribble.

Figure 20 Births and deaths, 2001/02–2019/20



Source: ONS

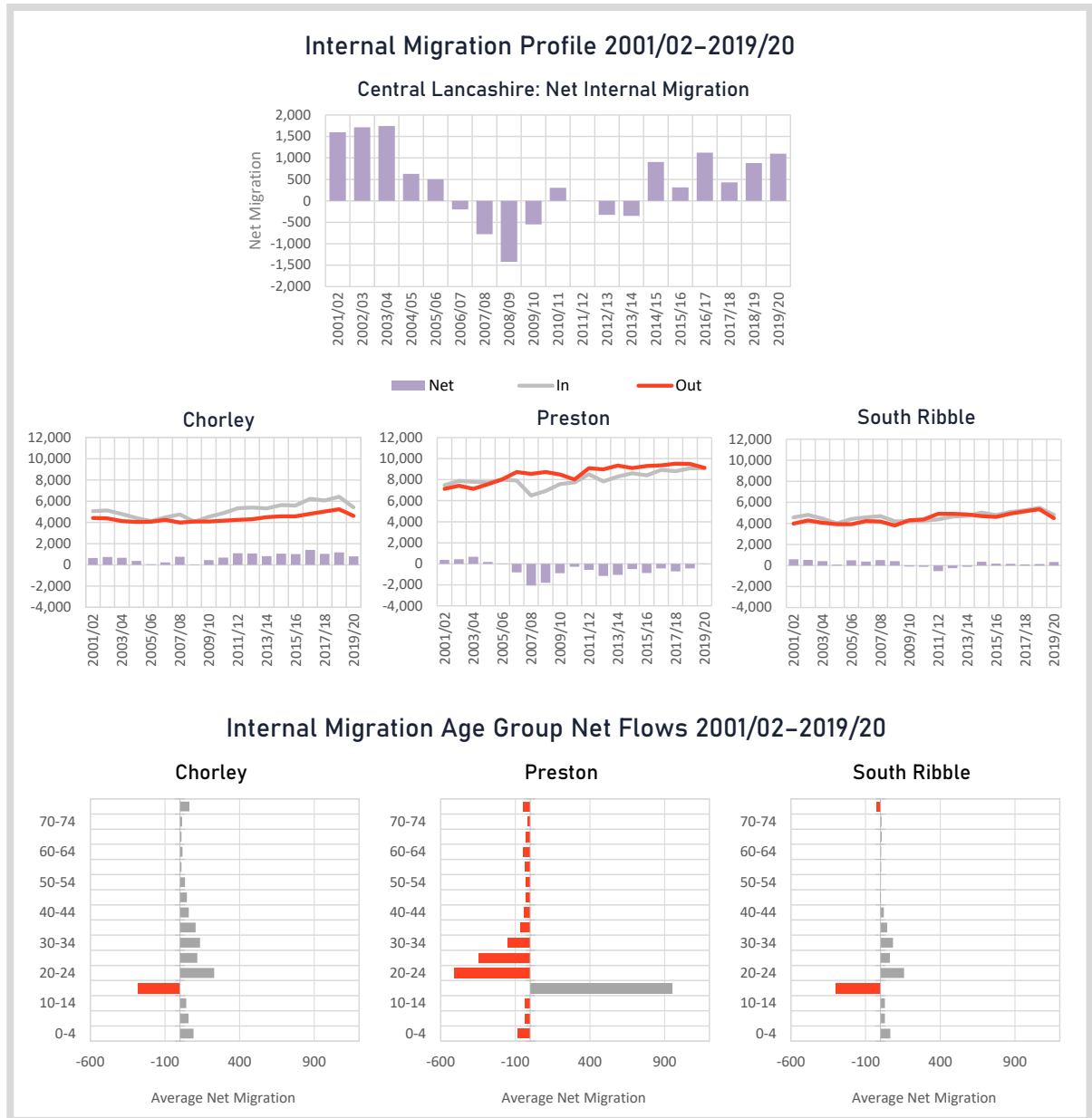
iii) Internal Migration

- 4.15 Net internal migration between Central Lancashire and elsewhere in the UK was positive between 2001/02 and 2005/06, and between 2014/15 and 2019/20. Between 2006/07 and 2013/14, the contribution of internal migration to population change was predominantly negative, as the flow of people leaving the Central Lancashire authorities exceeded the inflow (see pale purple bars in Figure 19).
- 4.16 Preston has seen the greatest in and out flows historically (around 8,000 per year), but with a larger outflow than inflow since 2005/06, net internal migration has largely been *negative* (Figure 21). Conversely, Chorley has experienced positive net internal migration (with the exception of 2008/09, when a small net outflow was estimated). South Ribble saw a net

¹² ONS Population estimates for the UK, England and Wales, Scotland and Northern Ireland: mid-2020

outflow between 2009/10 and 2013/14, but since then has experienced a net inflow.

Figure 21 Internal Migration Profile, 2001/02–2019/20



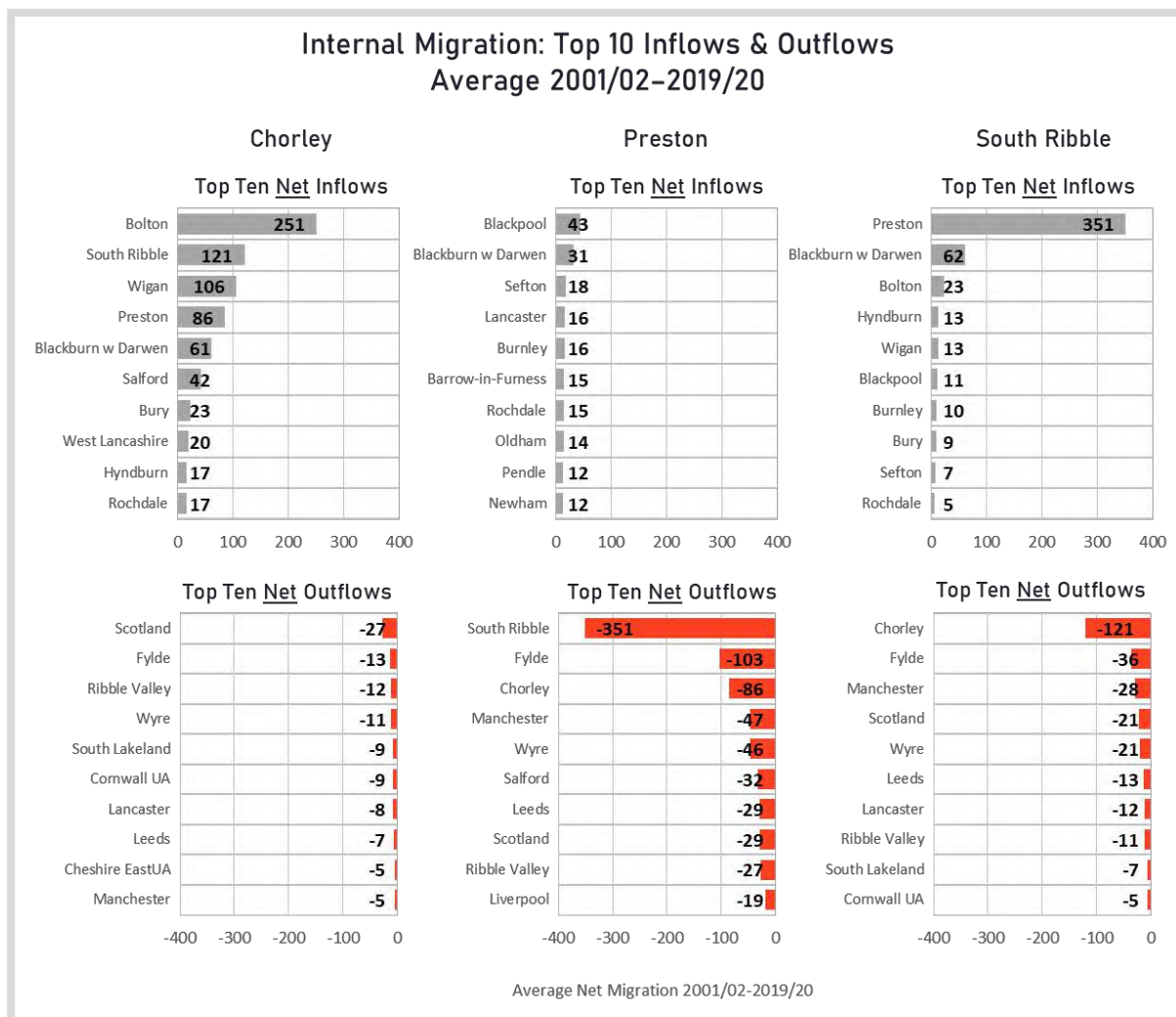
Source: ONS

4.17 When viewed by age, Preston has experienced a net *outflow* in all ages but the 15–19 group, reflecting the flow of student-age population moving to study in the authority. The 20–29 age groups see a net outflow, as students leave following graduation and as young people move elsewhere for work. In both Chorley and South Ribble, there is a net *outflow* in the 15–19 age group, again linked to the movement of the student-age population as people leave the authorities to study. Chorley has experienced a net inflow in the young working age groups, as has South Ribble.

4.18 The top 10 origins and destinations of internal migrants moving to/from Chorley, Preston and South Ribble are summarised in Figure 22, highlighting the importance of the migration flows between the three authorities. Preston records a net outflow to both South Ribble and Chorley, with a smaller net outflow seen between South Ribble to Chorley. The main net

inflow to Chorley is from neighbouring Bolton.

Figure 22 Top 10 net migration inflows and outflows, 2001/02–2019/20



Source: ONS

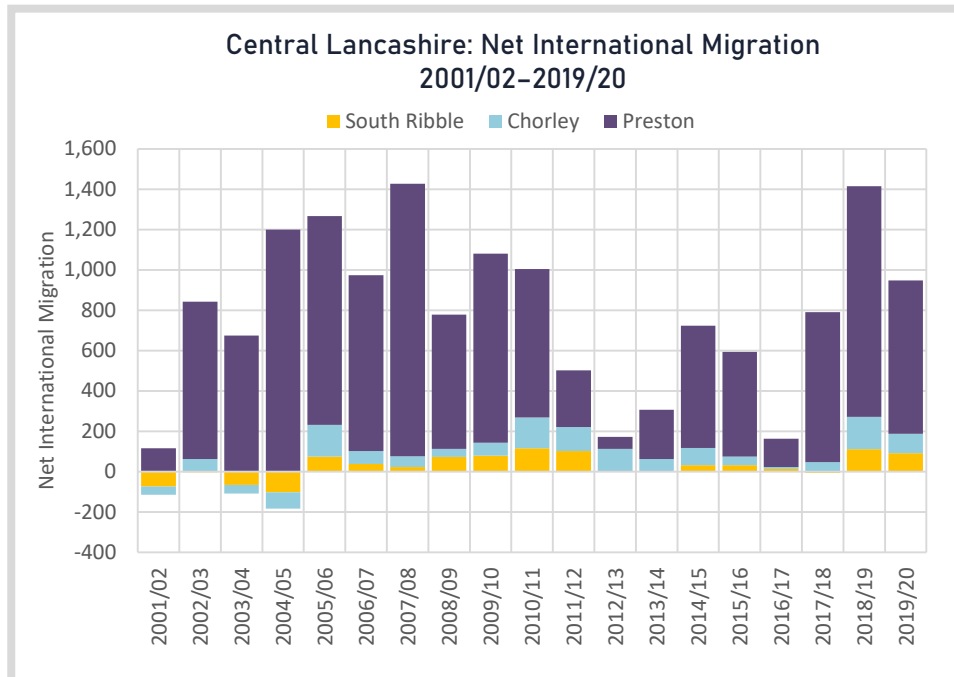
iv) International Migration

- 4.19 Net international migration (migration to/from overseas) has been positive in Central Lancashire throughout the 2001–2020 historical period, peaking in 2007/08 and 2018/19, with reduced net immigration between 2011/12 and 2016/17 (Figure 23).
- 4.20 Historically, net international migration has contributed little to population growth in both Chorley and South Ribble but has been the main driver of population growth in Preston. The reduction in net international migration between 2011/12 and 2016/17 was a result of an increased emigration flow from Preston. In more recent years, there has been a return to higher levels of net immigration, as emigration has reduced and immigration increased (Figure 24).
- 4.21 International migration continues to be the most difficult component of change to estimate robustly, with ONS downgrading its output to ‘experimental statistics’ status whilst improvements continue.¹³ The International Passenger Survey (IPS) provides the foundation of the UK’s immigration and emigration estimates, but this is being discontinued in favour of

¹³ Statement from ONS on the reclassification of international migration statistics, August 2019

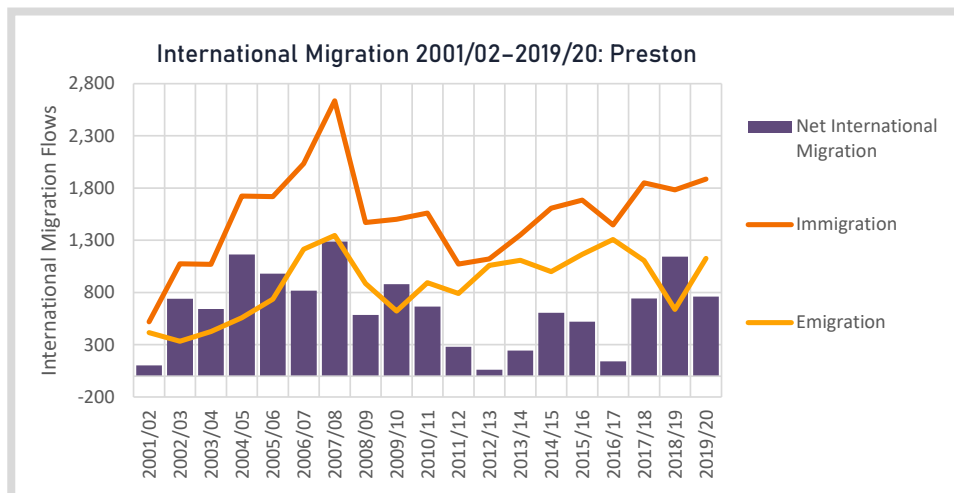
a mix of administrative datasets, including the patient register, higher education statistics and national insurance number (NINo) registrations.

Figure 23 Central Lancashire - Net international migration, 2001/02–2019/20



Source: ONS

Figure 24 Preston - International migration profile, 2001/02–2019/20



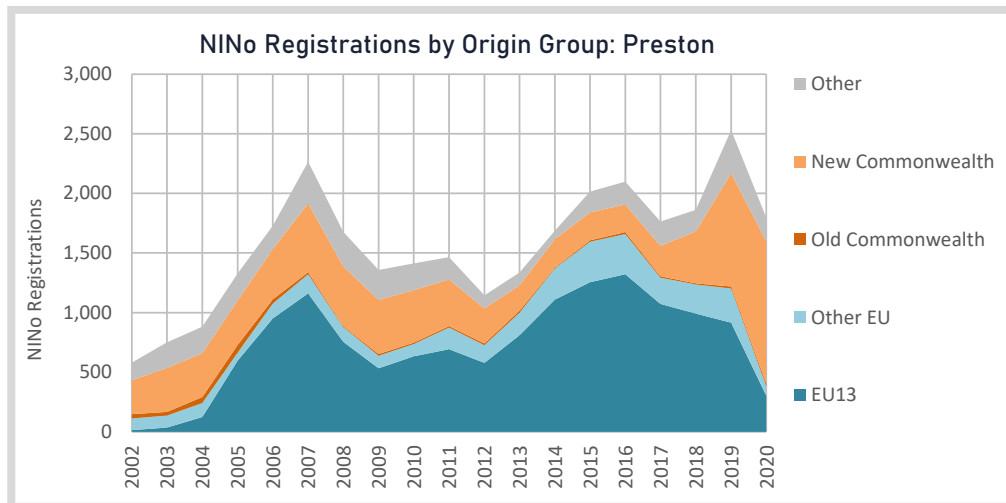
Source: ONS

4.22 The Department for Work and Pensions' (DWP) NINo statistics¹⁴ provide a complementary illustration of the international migration inflow to Preston. These statistics are different to the ONS migration estimates in that they refer only to work-based in-migration and include migrants whose stay may be shorter than 12 months. The NINo data does not record how many of these migrant workers have remained in Preston, moved elsewhere in the UK, or returned to their country of origin. Regardless of these differences, NINo registrations in Preston follow a similar pattern to the ONS MYE estimates, with two peaks in 2007 and 2019,

¹⁴ DWP National Insurance number allocations to adult overseas nationals entering the UK

and falling thereafter (Figure 25).

Figure 25 Preston - NINo registrations by country of origin category, 2002–2020



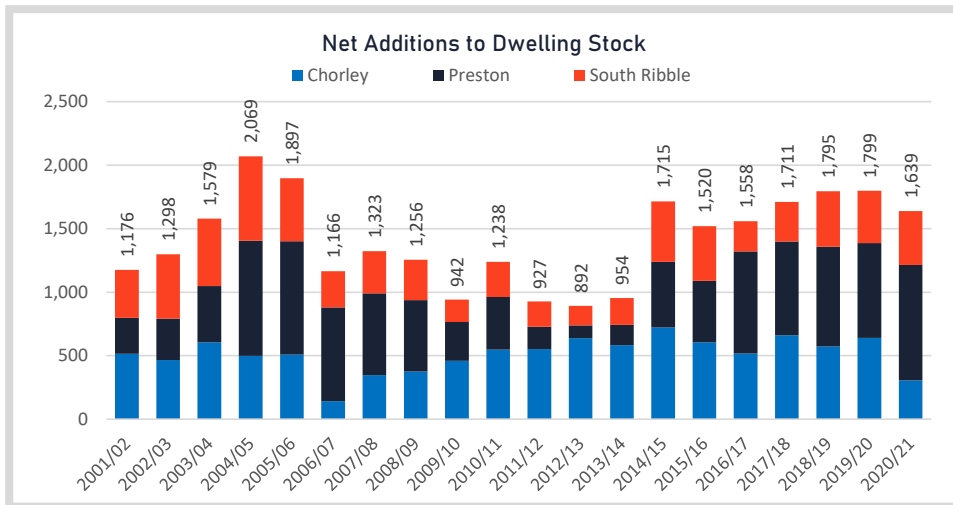
Source: DWP. Note: EU13 refers to countries who have joined the EU since 2004: Bulgaria, Croatia, Cyprus, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Romania, Slovakia and Slovenia.

- 4.23 A large proportion of NINo registrations have been associated with migrant workers from countries that have joined the EU since 2004. Migrants from Poland account for the largest number of NINo registrations since its accession to the EU, making up approximately 23% of all registrations in Preston between 2002 and 2020. Migrants from India have become the second largest group, accounting for 18% of NINo registrations, followed by Romania, at 10% of registrations.

v) Housing Completions

- 4.24 When considering the drivers of population growth, it is important to also consider the scale and distribution of housing growth, as an increase in housing supply can attract people to move to an area.
- 4.25 Since 2001, there have been, on average, 1,423 net additions to the dwelling stock each year in Central Lancashire (Figure 26), a net increase of 28,454 dwellings overall. Since 2014/15, the completion rate has been higher, averaging 1,677 per year. Between 2006/07 and 2013/14, completion rates were lower, driven mainly by lower rates of house building in Preston and South Ribble. Chorley has seen relatively consistent levels of housebuilding since around 2009/10, although growth dipped in 2020/21. Net additions to the dwelling stock have generally been lower in South Ribble than in Preston and Chorley, with the highest levels of growth seen between 2001/02 and 2005/06 in this authority.

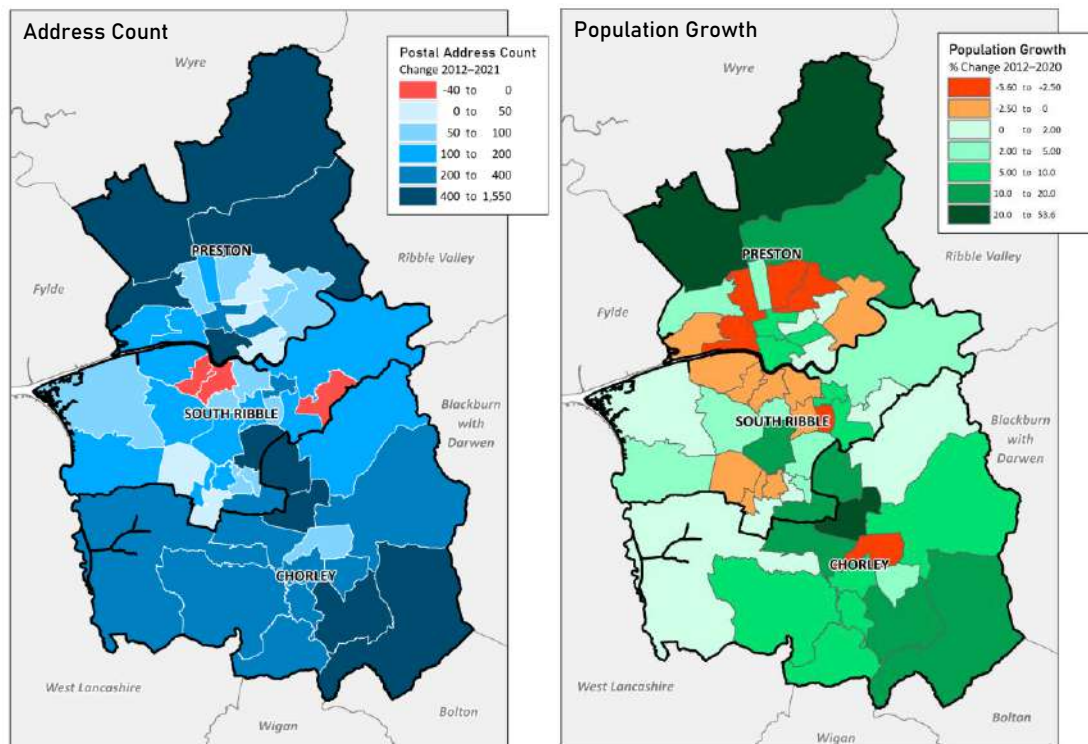
Figure 26 Net Additional Dwellings 2001/02–2020/21



Source: DLUHC Live Table 122¹⁵

4.26 The Royal Mail Postcode Address File¹⁶ (PAF) has been used to illustrate the change in the residential address count across Central Lancashire over the 2012–2020 time period (Figure 27).

Figure 27 LEFT: Address count change by ward, 2012–2020. RIGHT: Population growth (%) by ward, 2012–2020



Source: Royal Mail, ONS. Contains OS Data © Crown Copyright and database rights 2022.

4.27 The greatest increases in the address count (used as a proxy for the increase in the number

¹⁵ Department for Levelling Up, Housing and Communities (DLUHC) Live Table 122: Net Additional Dwellings

¹⁶ Royal Mail Postcode Address File (PAF)

of dwellings) have been in the wards to the north of Preston, and in the south of Chorley, and at the border of South Ribble and Chorley. There has been a slight reduction in the address count in three wards in South Ribble: Broad Oak, Coupe Green and Gregson Lane, and Middleforth. Those wards that have seen the greatest increases in the address count have also seen the highest levels of population growth. In wards with only modest increases in the address count (or slight reductions), population change has been negligible or negative.

vi) COVID-19 Context

4.28 The migration estimates presented above cover the time period to mid-year 2020, covering the first 3 months of the COVID-19 pandemic. For an indication of the impacts on the mobility and movement of people since the start of the pandemic, a range of data from Google, Land Registry and Royal Mail are presented below.

vii) Daily Mobility

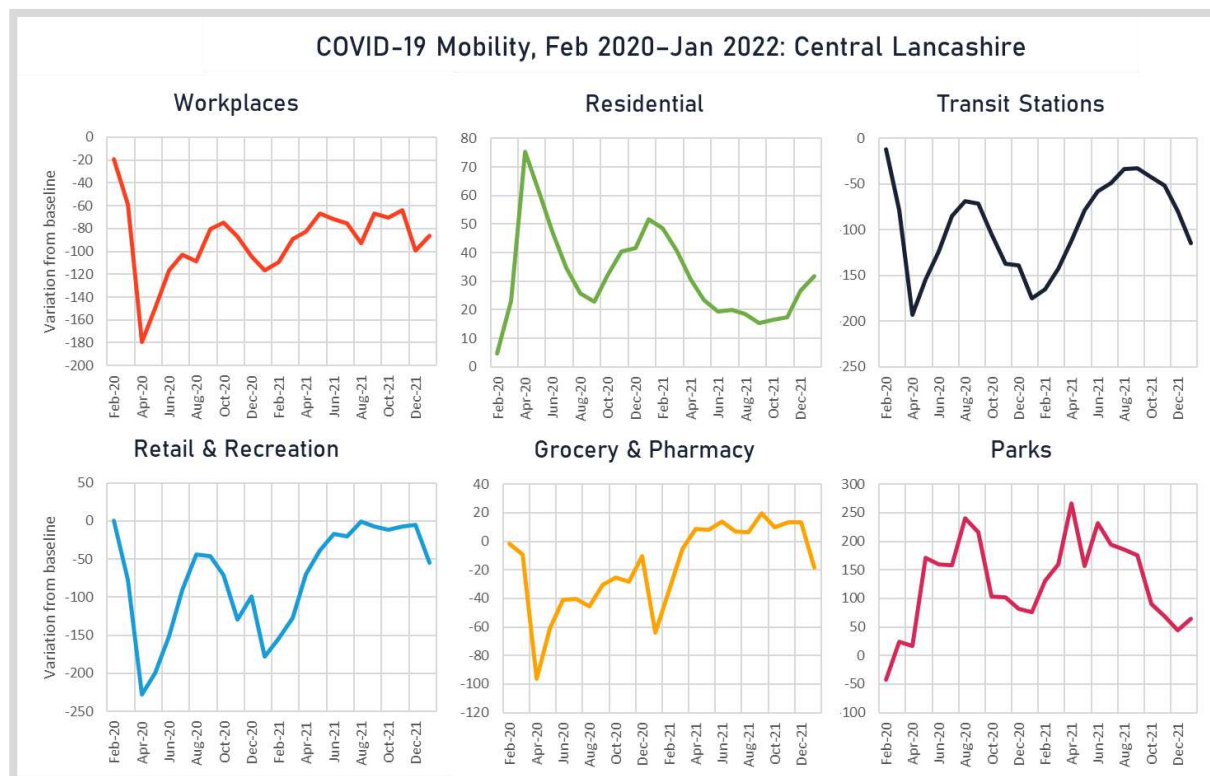
4.29 The unprecedented impact of COVID-19 is illustrated by community mobility statistics, which have been derived from aggregated and anonymised data from Google users. Google has made its data available for analysis during the pandemic through a series of 'Community Mobility Reports'¹⁷, showing the movement trends across different categories of place: **Workplace, Residential, Transit Stations, Retail & Recreation, Grocery & Pharmacy and Parks.**

4.30 For each category, the Google data illustrates the daily changes in mobility against a 'baseline', which represents a *normal* value for that day of the week (calculated from a 5-week period 3rd Jan–6th Feb 2020). For illustration, the daily statistics have been aggregated to produce a monthly profile for Central Lancashire (Figure 28).

4.31 From February 2020 to April 2020, a sharp reduction in movement was recorded in all places with the exception of Residential and Parks, reflecting the first national lockdown, with a similar pattern evident during the second and third lockdowns. From March to December 2021, movement in all places began to return to *normal* levels, with a deceleration in the recovery over the early months of winter likely to reflect at least in-part the seasonal resurgence in infection. Workplaces and Transit activities remain well below pre-pandemic levels.

¹⁷ Google Community Mobility Reports

Figure 28: Central Lancashire - Mobility Trends, Feb 2020–Jan 2022



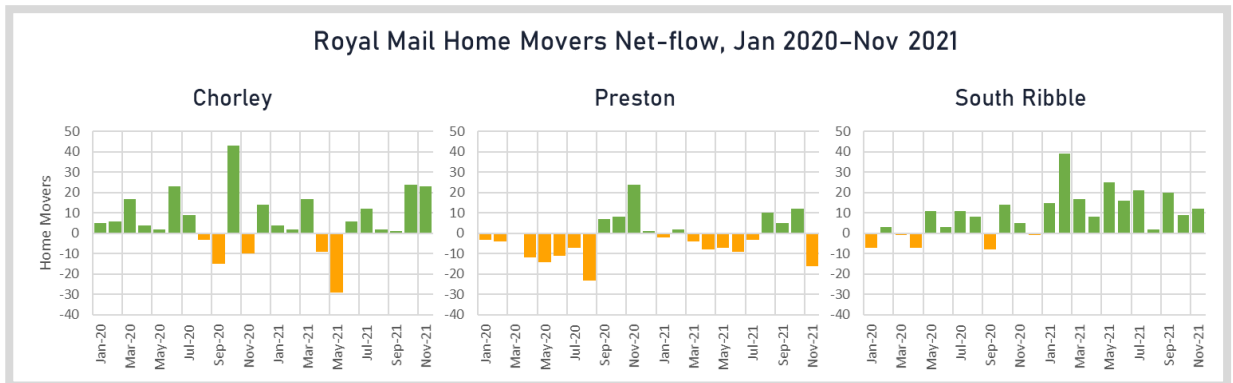
Source: Google

viii) Home Moves

4.32 The Royal Mail provides a mail redirection service to home movers (both owner-occupied and rented properties) and the data provides a proxy measure of migration within the UK during the COVID-19 pandemic¹⁸. In Chorley and South Ribble, the net balance of moves has generally been positive (i.e., a higher inflow than outflow), whilst Preston has seen more months with a negative net balance of moves across the two-year period from 2019. These patterns are in line with the trends seen in the recent ONS migration statistics. The sustained change in trends within South Ribble indicating an increase in population from migration, suggests a departure from the trend in recent years, and appears to have withstood the impact of the pandemic. This is indicative of no significant disruption to housing search patterns or rates of development.

¹⁸ Royal Mail Annual statistics for UK home movers

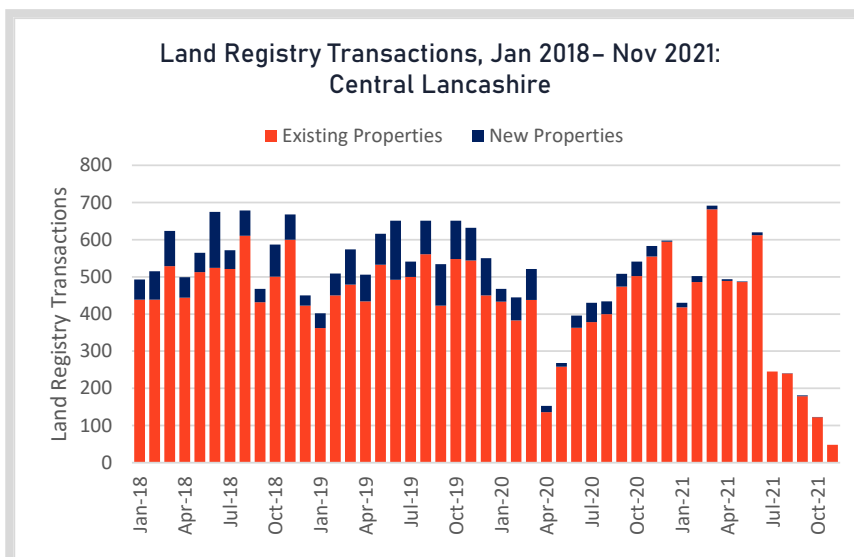
Figure 29 Home movers net-flow, January 2020–November 2021



Source: Royal Mail

4.33 Land Registry data provides an indication of how house sale transactions have been impacted by the COVID-19 pandemic, for both existing and new properties.¹⁹ Figure 30 illustrates the drop in transactions in Central Lancashire after March 2020, particularly for existing properties. The easing of lockdown restrictions in summer 2020 saw a rebound in property transactions, followed by a lesser decline during the third lockdown. According to Land Registry data, transactions of existing properties exceeded pre-pandemic levels in March 2021, although transactions for new properties have yet to recover.

Figure 30 Central Lancashire - Land registry transactions, January 2018–November 2021



Source: HM Land Registry. Note: due to a lag in data collection, the most recent months are likely to be artificially low.

c) Official Population Projections

4.34 The historical profile of growth and the relative scale and importance of each of the components of change have important implications for the formulation of future scenarios of population growth.

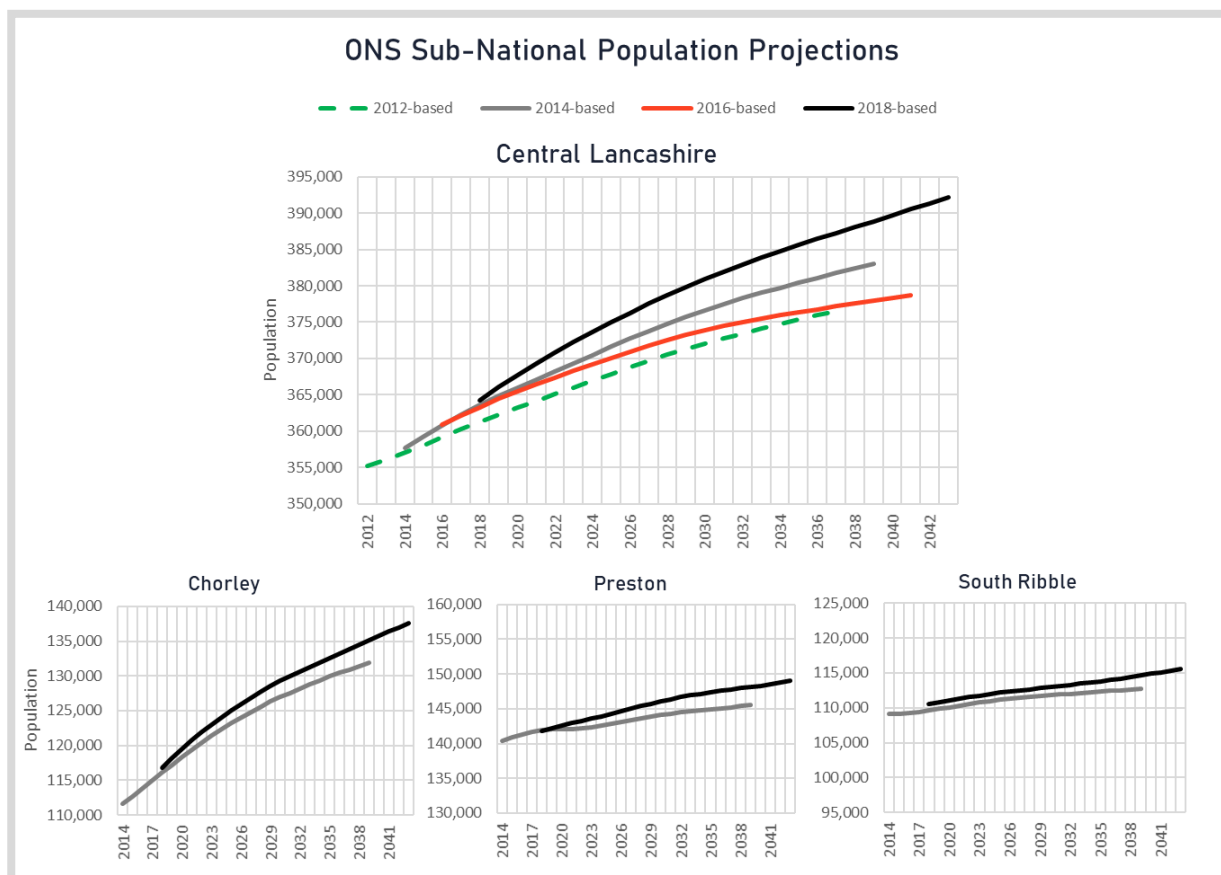
4.35 The official projections produced by ONS are trend-based, drawing their migration, fertility and mortality assumptions from the historical period preceding the base year (with no

¹⁹ HM Land Registry [Open Data](#)

adjustment to account for Unattributable Population Change²⁰ (UPC)). The latest 2018-based sub-national population projection (SNPP) for Central Lancashire in total projects average growth of 0.31% per year over its 25-year projection period, higher than the earlier 2016-based (0.20% per year), 2014-based (0.28% per year) and 2012-based projections (0.24% per year) (Figure 31).

- 4.36 Across all three districts, the latest 2018-based projection results in *higher* growth compared to the 2014-based (which underpins the 2014-based household projections used in the Standard Method). This is relatively unusual, occurring in around 35% of districts across England.

Figure 31 ONS sub-national population projections



Source: ONS²¹

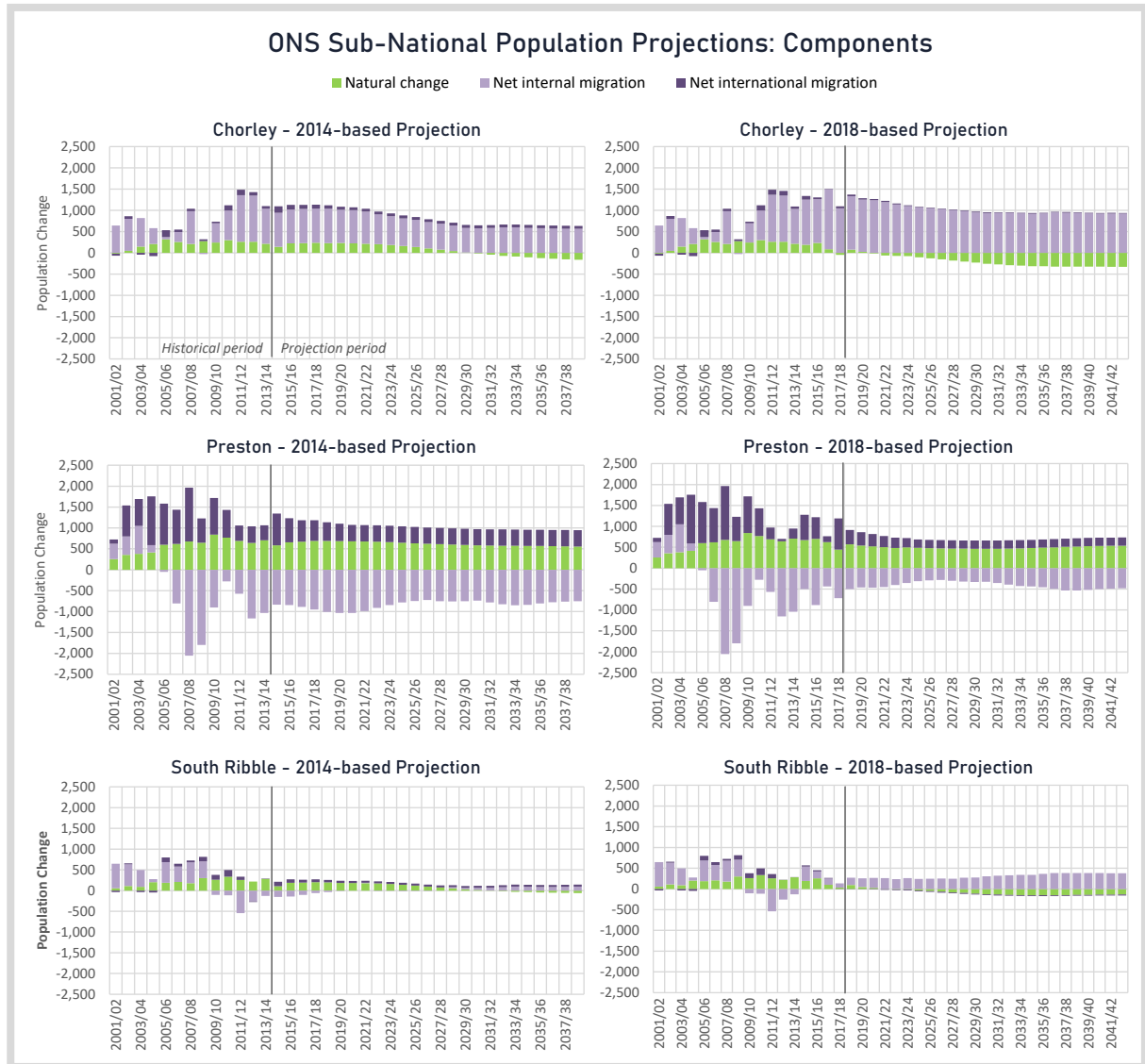
- 4.37 The differences between the 2014-based and 2018-based projections are a result of the different time periods from which ONS have calibrated the underpinning assumptions, along with methodological changes that have occurred between the two rounds of projections. Combined, this results in variations in the components of change between the two projections (Figure 32).
- 4.38 In the latest 2018-based projection, ONS has assumed a dampened fertility and mortality outlook, which, for Chorley and South Ribble (with their less youthful populations), results in population *loss* through natural change over the projection period. In Preston, with its more youthful population profile, and sustained international migration, growth through natural change is only slightly lower under the 2018-based projection compared to the earlier 2014-

²⁰ See Figure 6 and explanation at Footnote 5

²¹ ONS [Subnational population projections for England](#)

based projection.

Figure 32 ONS sub-national population projections: components of change



Source: ONS

4.39 In the latest 2018-based projections, internal migration assumptions have been drawn from the 2 years preceding the base year, rather than the usual 5-year period. This change was made by ONS following the introduction of its Higher Education Leavers Methodology (HELM), which aims to better account for the movement of people leaving higher education each year. ONS has applied this methodological change from 2016/17 onwards. HELM seeks “to increase the outflow of graduates from local authorities with higher education institutions at ages 22 and 23 years and to increase the inflow of graduates to local authorities that are popular graduate destinations (such as London and other major urban centres) at the same age”²². Whilst the HELM methodological changes are an important update, in that they go some way to correcting any potential over-estimation in the younger age groups, there is limited corroborative evidence to validate the new estimation method. The 2021 Census will therefore provide a timely update to the count of Central Lancashire’s population.

²² Population estimates for the UK, mid-2019 methods guide, July 2020

4.40 South Ribble records positive growth through internal migration in the 2 years preceding the 2018 base-year (Table 12), which results in positive growth when carried forward, compared to the earlier 2014-based projection (see Figure 32). Prior to 2014, net internal migration was *negative* in South Ribble; the contribution of this component in driving population growth is therefore negligible under the earlier projection but is the dominant driver of growth under the latest 2018-based projection.

Table 12 Average annual population growth by component of change

Component of Change	Average Annual Population Growth Preceding the Projection Base Year					
	Chorley		Preston		South Ribble	
	2014-based SNPP	2018-based SNPP	2014-based SNPP	2018-based SNPP	2014-based SNPP	2018-based SNPP
Natural change	255	135	728	629	270	172
Net internal migration*	832	1,231	-790	-579	-230	125
Net international migration	87	49	536	451	70	15

Source: ONS. *Note that the average annual growth figures are calculated over a 5-year historical period prior to the projection base year, apart from under the 2018-based SNPP, which uses a 2-year history for internal migration.

d) Labour Force & Employment Profile

i) Labour Force & Economic Activity Rates

4.41 At the 2011 Census, there were an estimated 185,731 people who were classified as 'economically active' across the three Central Lancashire authorities, equivalent to around 70% of the usually resident population (Table 13). This aligns with the economic activity rate for England.

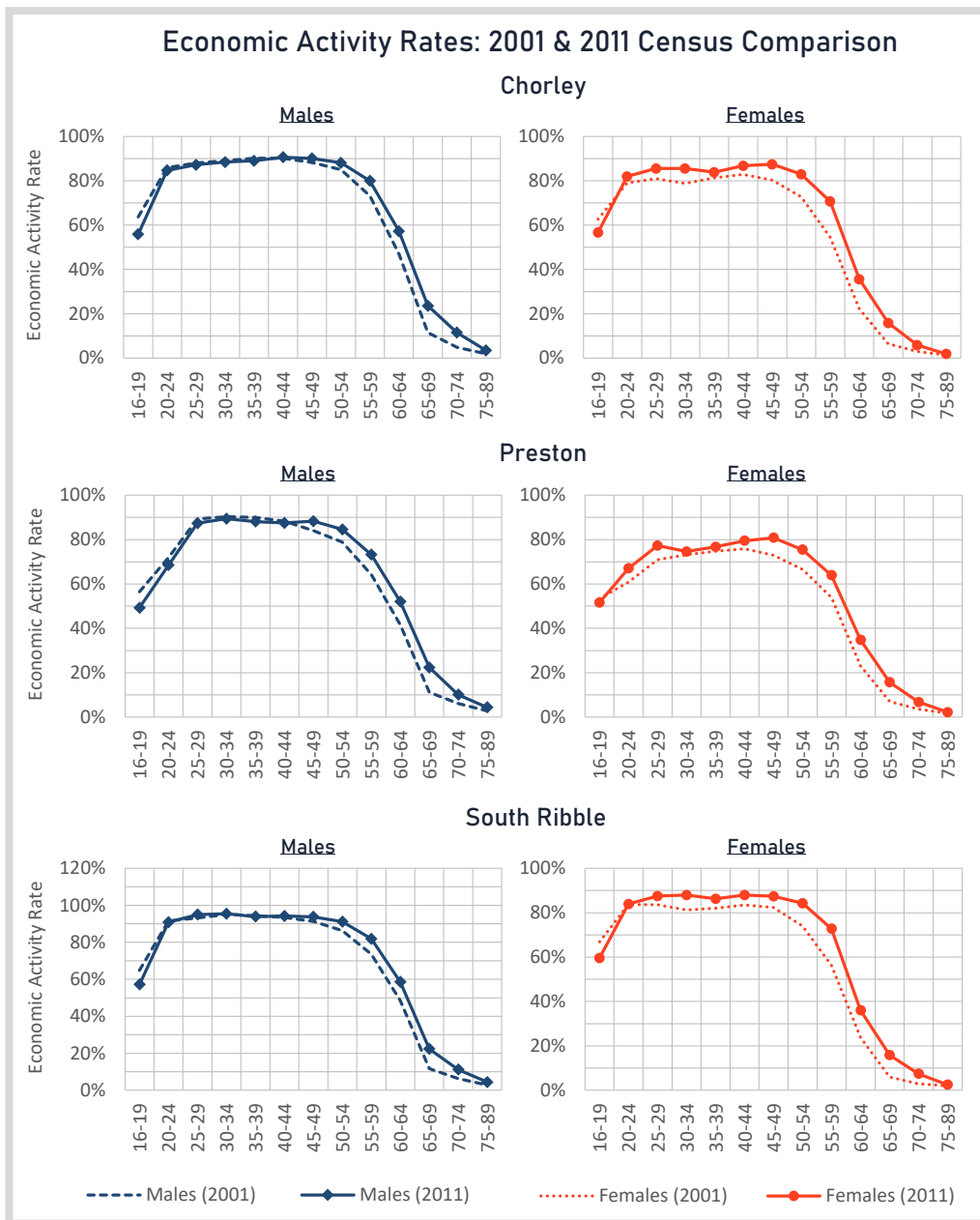
Table 13 2011 Census aggregate economic activity rates

	Chorley	Preston	South Ribble	Central Lancashire	England
Usually resident population (16–74)	79,951	104,085	80,458	264,494	38,881,374
Economically active population	56,645	70,509	58,577	185,731	27,183,134
Economically active population (%)	71%	68%	73%	70%	70%

Source: 2011 Census

4.42 The size and structure of the resident labour force is reflected in the economic activity rates. Figure 33 presents these rates by five-year age group (16–89) from the 2001 and 2011 Censuses, showing the difference between males and females and the changes over time. Economic activity rates have on the whole, increased since 2001, with the exception of the youngest 16–19 age group, in all three authorities. The reasons for the reduction in economic activity rates in the youngest age group is likely due to a combination of factors, including potential increased enrolment in Higher Education and pupils staying in education for longer, or due to a change in the wording of the Census questions.

Figure 33 Economic Activity Rates, 2001 & 2011



Source: 2001 & 2011 Census

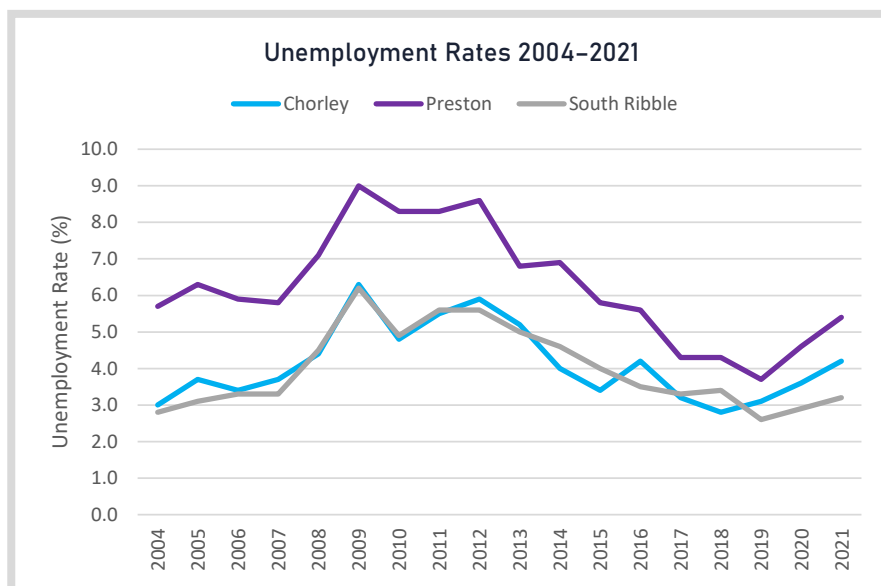
4.43 In terms of potential future changes to economic activity rates, evidence is drawn from the Office for Budget Responsibility’s (OBR) analysis of labour market trends. Within its 2018 Fiscal Sustainability Report²³, the OBR published its long-term labour force forecasts including estimated changes to age and sex-specific economic activity rates. These are informed by age and sex-specific population projections and historical economic activity rates, whilst also accounting for the rising state pension age and its impact upon the economic activity rates of older age groups. The OBR forecasts suggest that the increases seen between 2001 and 2011 will be continued, across all but the youngest age groups for females, and in the 40+ age groups for males.

²³ OBR Fiscal Sustainability Report, July 2018

ii) Unemployment

4.44 Unemployment rates measure the proportion of unemployed people within the resident labour force. Data from ONS shows out of the three districts, Preston has consistently had the highest unemployment rate since 2004, with rates in Chorley and South Ribble reasonably similar across the historical period (Figure 34).

Figure 34 Unemployment Rates (%), 2004–2021



Source: ONS

4.45 Across all three districts, unemployment rates rose sharply during the 2008 recession, peaking in 2009. Since then, the unemployment rates have dropped back down to pre-recession levels in Chorley and South Ribble, and lower than pre-recession in Preston. Rates have risen sharply in the most recent two years of data, most likely as a result of the economic impact of the COVID-19 pandemic, although the impact on rates of unemployment in South Ribble appears to have been relatively lower than for either Preston or Chorley.

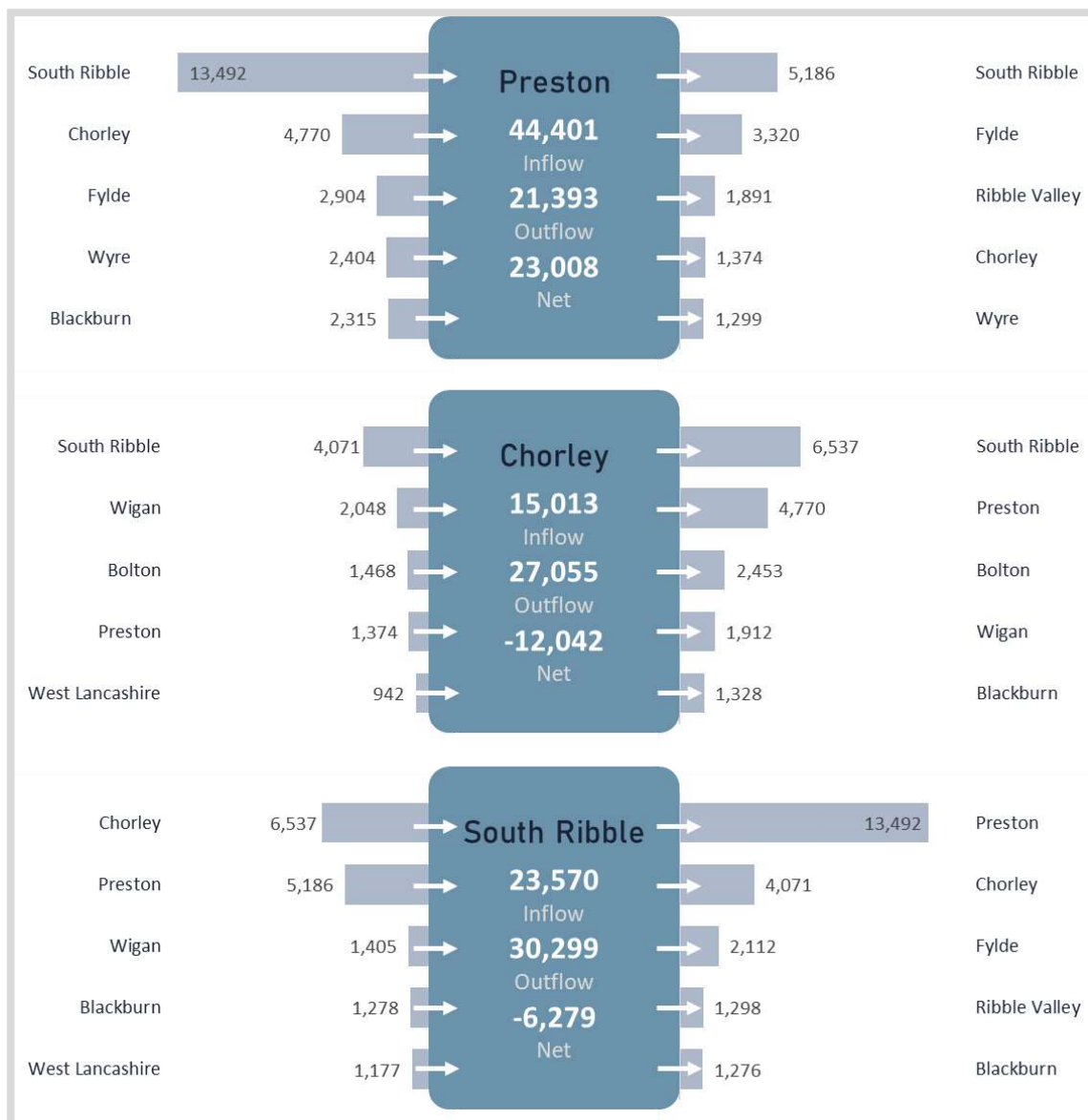
iii) Commuting Patterns including Commuting Ratios

4.46 Figure 35 presents the top 5 commuting inflows and outflows for the three Central Lancashire authorities, highlighting the high level of connectivity between each area. The largest flow of commuters at the 2011 Census was from South Ribble to Preston, with smaller but substantial flows from Chorley to South Ribble and Preston, and from Preston to South Ribble. Smaller flows are seen between the three authorities and the surrounding districts, including Fylde, Bolton, Wigan, Blackburn with Darwen, and West Lancashire.

4.47 The difference between the level of employment in an area and the size of the resident workforce (i.e., residents in employment) can be used to infer a 'commuting ratio'. A ratio higher than 1.00 indicates a net *out*-commute (the number of resident workers exceeds the level of employment in the area). A commuting ratio lower than 1.00 indicates the reverse: a net *in*-commute (the level of employment in the area exceeds the size of the resident workforce). The closer the ratio is to 1.00, the greater the balance between the size of the resident workforce and the level of employment.

4.48 In the case of Preston, the level of employment in the district *exceeds* the size of the resident workforce, indicating a net in-commute into the area. The opposite is the case in both Chorley and South Ribble, where the number of resident workers exceeds the level of employment, indicating a net out-commute (Table 14).

Figure 35 2011 Census commuting flows: Top 5 inflow and outflows



Source: 2011 Census

Table 14 2011 Census Commuting Ratios

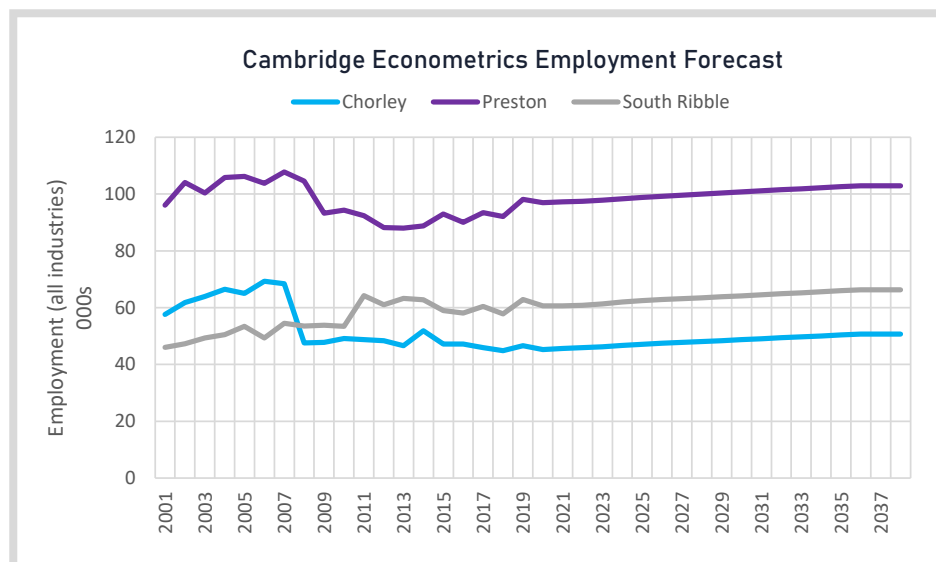
	Chorley	Preston	South Ribble
Resident workforce	53,890	64,462	56,036
Total employment	41,848	87,470	49,307
Commuting Ratio	1.29	0.74	1.14

Source: 2011 Census. Note that these figures are people-based.

iv) **Employment Forecast**

- 4.49 Cambridge Econometrics has produced an employment forecast for the three Central Lancashire authorities, using its demand-led Local Economy Forecasting Model (LEFM). The baseline projection is based on historical growth in the local area relative to the region or UK (depending on which area it has the strongest relationship with), on a sector-by-sector basis. The measure of employment is workplace-based jobs, which include full-time, part-time and self-employed.
- 4.50 Over the historical period to 2020, employment levels in Central Lancashire have fluctuated (Figure 36); in both Chorley and Preston, the reduction in total employment following the 2008 recession was more pronounced than in South Ribble. From 2020, employment growth is projected to average 0.5% per year in Chorley, 0.3% in Preston, and 0.5% in South Ribble.

Figure 36 Cambridge Econometrics Employment Forecasts



Source: Cambridge Econometrics LEFM

v) **2020 Commuting Ratio**

- 4.51 Travel to work and commuting data is not yet available from the 2021 Census. To evaluate how the commuting balance may have changed since 2011, a 2020 commuting ratio has therefore been derived.
- 4.52 As outlined above, the commuting ratio is the balance between the size of the resident workforce (i.e., people who live in the area and are in employment, either in the area or elsewhere), and the level of employment in an area. The 2020 employment figure has been drawn from the Cambridge Econometrics forecast for each of the 3 local authorities (adjusted to account for double jobbing – see **Appendix 1** for further detail). Through the application of the economic activity rates and the latest unemployment rates to the 2020 mid-year population estimate, the size of the resident workforce in each authority has been derived.
- 4.53 This analysis suggests that the commuting balance in Preston has remained unchanged, at 0.74 (indicating a net in-commute). In Chorley, the net out-commute has *increased*: the growth in the size of the resident workforce has been larger than the growth in the level of employment in Chorley. In South Ribble, the commuting balance has shifted from a net out-commute to a small net in-commute, predominantly as a result of a higher rate of job creation and relatively lower levels of housebuilding and population change over the 2011 to 2020 period (Table 15).

Table 15 2020 derived commuting ratios

		Chorley	Preston	South Ribble
A	CE Forecast Total Employment (2020)	45,232	96,986	60,686
B	Double Jobbing adjustment	4.5%	3.8%	3.3%
C	Total Employment ($A/1+B$)	43,281	93,478	58,747
D	Labour Force (2020)	62,950	73,358	59,592
E	Unemployment Rate	4.2%	5.4%	3.2%
F	Unemployed People ($D \times E$)	2,644	3,961	1,907
G	Resident workforce ($D-F$)	60,306	69,396	57,685
2020 Commuting Ratio (G/C)		1.39	0.74	0.98

Source: Cambridge Econometrics, ONS, 2011 Census, Edge Analytics, DLP

5.0 LOCAL HOUSING NEED

5.1 This section undertakes the quantitative calculation of local housing need in accordance with the Standard Method in national planning practice guidance. This section also summarises qualitative evidence of housing needs as derived from engagement with stakeholders, including observations regarding the suitability of the Standard Method to provide the starting point for plan-making.

a) Standard Method

5.2 The starting point in assessing housing needs is the Government's Standard Method, used to calculate a minimum annual Local Housing Need (LHN) figure for an area. The Standard Method combines the Ministry of Housing, Communities and Local Government (MHCLG) 2014-based official household projection (for a 10-year baseline period) with an adjustment to account for affordability, a cap to the level of increase based on the status of the Local Plan, and a 35% cities and urban centres adjustment²⁴. This final step is not applicable to the Central Lancashire authorities.

5.3 Using the approach detailed below, as outlined in PPG, the Standard Method results in a minimum LHN figure of **988** for Central Lancashire. The calculation steps and LHN figures for the individual authorities are summarised below in Table 16. In the next section, these LHN figures have been used to derive demographic projections for each of the three authorities, evaluating the household and population growth levels that could result if the annual LHN housing need figures were realised.

i) Step 1: Set the baseline

5.4 The baseline level of growth is calculated from the 2014-based sub-national household projections²⁵, with the average level of household growth calculated over a 10-year period (from 2022). The 2014-based projections are used to align with the government's housing growth ambitions and "to provide stability for planning authorities and communities [and] ensure that historic under-delivery and declining affordability are reflected".²⁶

5.5 For Central Lancashire, this results in a baseline figure of **859** per year.

ii) Step 2: Apply affordability adjustment

5.6 The baseline figure is adjusted to account for affordability, using the latest available median house price to workplace-based earnings ratios²⁷. No adjustment is applied where the affordability ratio is 4 or below. For each 1% the ratio is above 4, the average household growth baseline is increased by a quarter of a percent:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

5.7 For Central Lancashire, the local affordability ratio is highest in Chorley, at 7.02, and lowest in Preston, at 5.54 (see Table 16). Applying the resulting adjustment factors results in an adjusted figure of **988**.

iii) Step 3: Cap the level of increase

5.8 A cap is applied to limit the level of increase, depending upon the stage that the local authority is at with regards to its strategic policies for housing. Where the policies have been adopted within the last 5 years, the LHN figure is capped at 40% above the average annual housing

²⁴ The current Standard Method is summarised in PPG, paragraph 004 Reference ID: 2a-004-20190220.

²⁵ MHCLG [2014-based household projections](#) in England, 2014 to 2039, Live Table 406

²⁶ PPG paragraph 005 Reference ID: 2a-005-20190220

²⁷ ONS [House price to earnings ratios](#)

requirement figure as set out in the existing policies. Where the relevant policies were adopted more than 5 years ago (as is the case in Central Lancashire), the LHN is capped at 40% above whichever is higher of:

- the average annual projected household growth identified in Step 1; or
- the average annual housing requirement figure as set out in the most recently adopted strategic policies.

Table 16 Standard Method minimum Local Housing Need calculations

Calculation Step	Chorley	Preston	South Ribble
Step 1: Baseline			
Households 2022	51,692	59,706	48,394
Households 2032	56,248	62,128	50,008
10-year average	456	242	161
Step 2: Affordability Adjustment			
Median House Price	£192,750	£155,000	£181,000
Gross Annual Workplace-based Earnings	£27,439	£28,003	£30,291
Local Affordability Ratio	7.02	5.54	5.98
Adjustment Factor	1.19	1.10	1.12
Uncapped Growth	542	265	181
Step 3: Cap the level of increase			
Local Plan (Strategic Policies) Date Adopted	July 2012 (Central Lancashire Joint Core Strategy)		
Local Plan Adopted in Last 5 years?	No	No	No
Annual Local Plan Requirement (p.a.)	417	507	417
Capped Growth	542	265	181
Minimum Local Housing Need			
Final LHN Figure	542	265	181
Central Lancashire Total	988		
Proportional Split	55%	27%	18%

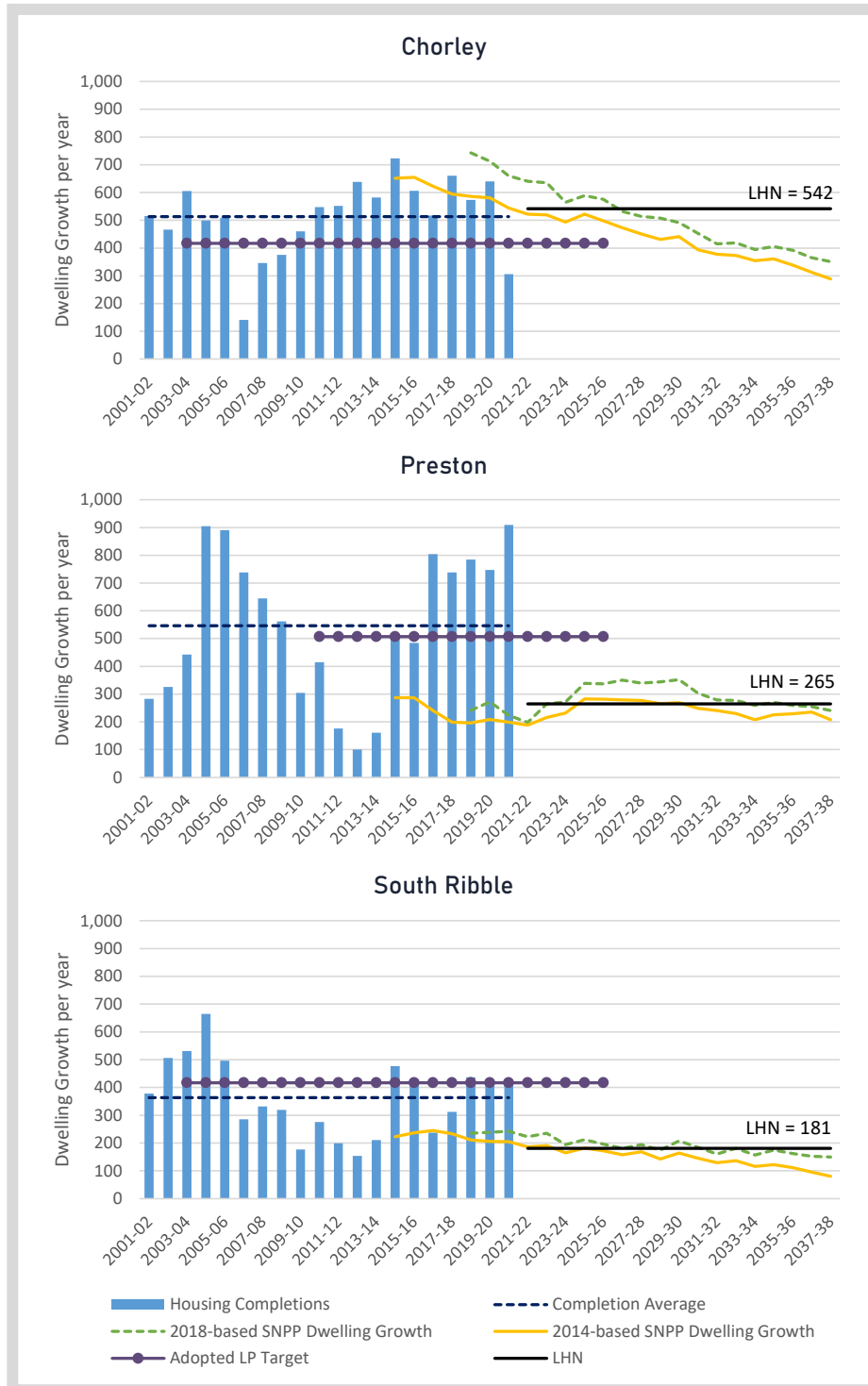
Source: MHCLG 2014-based subnational household projections, ONS House Price to Earnings Ratios, year ending Sept 2021.

b) Benchmarking the LHN

5.9 When compared to the adopted Local Plan housing requirements, the LHN figure is higher for Chorley, but lower for Preston and South Ribble (Figure 37). In both Preston and South Ribble, the LHN figures are also lower than the long-term (20-year) housing completion averages. In Chorley, the LHN figure of 542 is only slightly higher than the long-term completion average (513). The difference between LHN figure and completion rate is most pronounced in Preston where completions over the last 5 years have averaged 797 per year, considerably higher than the minimum housing need figure of 265. In the following section, the LHN figures for the Central Lancashire authorities have been used to derive a 'dwelling-led' demographic scenario, against which a range of alternative trend scenarios have been

compared.

Figure 37 Benchmarking the LHN figures



Source: ONS, Edge Analytics, Councils, MHCLG

c) Qualitative Assessment of Housing Needs – Stakeholder Engagement

5.10 A key part of the research to inform this study involved engaging directly with stakeholders with interests in the delivery of market and affordable housing. A total of 11 interviews were undertaken with senior individuals from a wide range of organisations and sectors including those listed below. In each interview the discussion was framed around a series of open questions to draw upon the expertise and locally-specific knowledge of each stakeholder.

- Council Officers from the three Central Lancashire Authorities and Lancashire County Council, including those working in housing strategy and affordable housing;
- Homes England;
- Estate and lettings agents;
- Registered and specialist housing providers;
- Lancashire Enterprise Partnership

5.11 In addition to these interviews, a questionnaire was distributed by email to developer stakeholders of large scale strategic sites setting out a request for observations on the scope of the study and seeking views on the factors most relevant to assessing the level and distribution of housing needs across Central Lancashire together with approaches to identifying and addressing the housing needs of different groups. The questionnaire also sought views on whether there are any gaps in market, affordable or specialist housing provision.

5.12 A summary of the key headline findings from the stakeholder engagement interviews is provided in Table 17 below.

Table 17 Stakeholder Response Summary

Theme	Stakeholder Response Summary
<p>Recent performance / changes in property market</p>	<p>Demand has always remained strong.</p> <p>Viability is an issue, but less so in Lancashire compared to other parts of the country. There are greenfield areas in all three authorities – market is performing well, market is rising.</p> <p>Brownfield sites are generally more complicated sites to deliver. Also, specialist needs are also more difficult to provide for through new development either as part of larger schemes or standalone developments. On these sites / for these types of developments there is generally a reliance on grants to deliver sites. Homes England’s role is to intervene in areas where the market will struggle to deliver by itself.</p> <p>Central Lancashire has been key growth area and going forwards continues to demonstrate some of the key characteristics and drivers for growth – for example the availability of land and prospects for employment growth in other key sectors (e.g., National Cyber Force proposals coming forward within the Plan Area). Growth likely to be focused northwards towards South Ribble and Preston in future. Don’t envisage growth in Chorley to continue at same rates as it has done in recent years.</p> <p>Increasing demand across the board – e.g., older people currently living at home looking after children who require supported living but are now too old to look after them themselves.</p> <p>Since market has opened up again post-Covid respondents have noticed larger number of young couples looking to purchase. Last year also had higher number of older single people who have divorced or going through a break-up.</p> <p>No seasonal changes now (which would have been seen previously), particularly since lockdowns have ended. Very busy on sales – sale prices have increased 5-10%. Rental prices have also gone up – regularly adding</p>

Theme	Stakeholder Response Summary
	<p>£50/month to rental prices when a property becomes vacant and they are still letting straight away.</p> <p>3-bedroom (and some 4-bed) properties are most in demand. 2-beds perform slightly less well.</p> <p>1-beds (especially apartments) – much slower market. Primarily due to large number that are being built in city centre in Preston.</p>
<p>Patterns of housing search and migration flows</p>	<p>Much of desire to move is personal circumstances – people who are retired and want to downsize. Bereavement can also be a trigger. Children often tend to be the drivers – often people in 40s/50s. Another driver is when people become less mobile and social circle begins to shrink, don't want to drive at night or drive very far. Moving to higher density housing areas provides sense of community around them – strong friendships and communities develop in these schemes.</p> <p>Lots of international migration – especially from Eastern Europe. These communities tend to focus in certain areas of Preston – New Hall Lane, Plungington, Ashton, Blackpool Road area. Less international migrants in Chorley.</p> <p>International migrants tend to come into rental areas to start with, then buy somewhere later.</p> <p>There is also lots of immigration from Manchester and Liverpool (especially to Chorley/Leyland). There is also immigration from areas further south (particularly associated with graduate retention at UCLAN).</p>
<p>Types and size of residential property most in demand by sector / location</p>	<p>Large number of families looking to move into Preston – central locations. Younger couples like being out in country - Cottam is most popular from purchasing perspective (especially 2 beds).</p> <p>Rental side – demand is for bigger family housing (3-4 beds). Location-wise – closer to town is more popular.</p> <p>From purchasing perspective, highest demand is 2 beds. Flats don't do as well – they do sell but often end up relaxing the criteria after 6 months. Some have been converted to rented because they haven't been able to sell them.</p> <p>Sales – biggest gaps in provision are for 3-4 bed houses. There are lots being built in Preston but they are selling even before they are completed.</p> <p>Also, shortage of first-time buyer houses - £100-160k. Properties in this price range are all rental properties currently, but they're not coming up for sale because the market for rental properties is so strong.</p> <p>As well as first-time buyer properties there is also a significant shortage of 'second-move' properties i.e., 3-4 bed properties.</p> <p>There is a shortage of properties in South Ribble and Chorley in particular, as there has been a mass out-migration from Manchester/Liverpool to these areas. Bolton is not particularly attractive so people are moving further north to Chorley, Leyland and Preston.</p> <p>Gaps in rental market – particularly gaps in provision of 'non-student' student accommodation i.e., private rental properties, rather than purpose built student accommodation (PBSA) as there is a growing trend of students who don't want to live in student halls (especially foreign students). Student halls (PBSA) built in last few years aren't full. There is therefore a shortage of city centre apartments to meet this demand. International students would require, for example, 2 bathrooms in a 2 bedroom flat rather than one shared bathroom.</p> <p>There is more demand for detached/semi-detached properties than other types. There is less demand for terraced housing (which tends to be older) – fewer owner-occupiers demanding these. Probably due to age and potential</p>

Theme	Stakeholder Response Summary
	<p>maintenance costs – especially 2-up-2-downs. If these terraced properties don't sell, the prices are dropped and then investors will purchase them as rental properties.</p>
<p>Gaps in provision of market housing</p>	<p>Gap in family homes incl. 3-5 bed houses. Specialist housing – significant lack of supported housing. Need and supply isn't coordinated enough at the moment. S106 agreements – rural areas tend to be more isolated than in other areas of the country so infrastructure requirements are higher.</p>
<p>Demand for affordable housing / gaps in provision</p>	<p>There are other factors that feed into attractiveness of schemes e.g., locality, on-site provision. Schemes that are managed well with on-site facilities are schemes that have a very high demand. Affordable housing schemes that have enough units to have a sensible service charge are really in demand.</p> <p>A housing association stated that during the pandemic, interest increased. People across entire housing portfolios were reviewing their housing needs. Huge boom in property market in past 18 months generally – people have reviewed living arrangements and feel that things need to change.</p> <p>Demand isn't driven by property type – all property types have significant waiting lists. Queen Street in Preston used to be a low demand area due to high levels of anti-social behaviour and poor quality of area, but this has significantly improved recently – last waiting list now has around 80 people on it.</p> <p>A housing association specified that when considering social housing – numbers of applicants are generally quite static.</p> <p>Priority banding for Band A changed – the number of people in Band A used to be a smaller number, but the 2018 Homelessness Reduction Act significantly increased the number of people in this band. There is now a larger pool of people getting homelessness priority but it means other people in lower bands aren't getting referrals.</p> <p>For social rented there has been quite an increase in demand looking at how the number of bids for properties has changed. For 2-bed and 3-bed new build schemes there are upwards of 200 bids (e.g., 238 bids for a recent property in Chorley; 150-190 in Preston; 181 in South Ribble).</p> <p>For some types of high rise flats and sheltered schemes levels of demand have been relatively lower. The Community Gateway scheme (Preston) is working to take out of service some of the older sheltered schemes (reducing lower age for tenancies) so levels of stock are reducing but levels of demand remain very high for some sheltered stock.</p> <p>There has been a surge in applications in priority tenants from the private sector now that the evictions cap has been lifted. Some tenants in this sector have previous tenancy arrears from the social rented sector so these can be difficult to re-house.</p> <p>Abandonments due to cost of living were a historic issue in Preston. It is unclear yet whether the cost of living crisis will lead to tenancy abandonments but this seems feasible particularly from the perspective of single-person tenancies. There is a household support fund that may help to provide relief in the short term. This will not necessarily assist benefit-capped families who have already need to move several times.</p>
<p>Demand for other specialist forms of accommodation / gaps in provision for</p>	<p>A housing association stated that very little supported housing in some areas (Majority of stock is concentrated just outside Preston city centre – e.g., Avon and Queen Street estates, other estates across Leyland, Bamber Bridge, Penwortham, also New Hall Lane (Preston city centre)) but across the city there is a distribution of sheltered schemes and one extra care facility. Local</p>

Theme	Stakeholder Response Summary
<p>specialist groups e.g., elderly, disabled, students</p>	<p>commissioners require 4 bedrooms+ as part of supported / older persons' housing schemes. Some of the existing supported housing has been decommissioned.</p> <p>There is a need is for 4 bed+ schemes – to meet the needs of people with learning disabilities and mental health concerns.</p> <p>There is shortage of accessible accommodation for people with physical disabilities generally across the board but specifically this adds to pressure across the housing stock with residents having to go into other specialist accommodation.</p> <p>Also increasing number of people with mental health issues who require supported living.</p> <p>Ageing population in Chorley will require more specialist supported housing.</p> <p>Primrose Gardens – specialist facility in Chorley. This filled very quickly. 2-3 times applicants as number of rooms available.</p> <p>Tatton Gardens – new scheme due to open, extra care facility for older tenants. This sits in commercial team – owned and managed by Council.</p> <p>In terms of University accommodation, many students end up in effectively private accommodation. This does not really seem like an appropriate mix. A lot of the University's stock is quite dated and will also need to be remodelled e.g., to improve the pastoral care and this is likely to lead to an overall reduction in bedroom numbers and a need to go out to the private market.</p>
<p>Potential strengths/opportunities for residential property market in Central Lancashire</p>	<p>Locations – most popular sites for retirement housing are in suburban locations with easy access to local town, high quality family housing around them. Most people want to retire in the community in which they already live – want to be close to family/friends/existing social circle. Location is dependent on target market – if delivering for lower end of market would need to be more urban location to be affordable.</p> <p>A housing association specified when talking about retirement housing that locations have to be much more targeted (e.g., Garstang, Preston – has grown rapidly), this is where targeted provision would be needed. Needs to be part of broader housing mix.</p> <p>Big opportunity to deliver retirement housing in town centres but needs other support / regeneration first.</p> <p>Repealing CIL on retirement bungalows would help, as these schemes are already providing a community infrastructure need.</p> <p>There is an emphasis from central government on bringing forward brownfield sites and a role in regeneration / levelling-up – this is a key opportunity, especially in Lancashire e.g., Preston city centre. This is coming through government policy.</p> <p>South Ribble / Chorley are more 'borough' authorities with larger commuter populations and smaller pockets of deprivation. Preston is more urban/suburban in nature with greater need for regeneration in inner city – growing in popularity, especially with HS2 due to arrive there.</p> <p>In terms of delivering the City Deal, the A582 needs to be delivered by South Ribble, but Preston would be putting in additional funds. Preston have identified at least three infrastructure projects that would need to be delivered with City Deal funding (two city centre schemes – Harris and Animate cinema-led leisure scheme, and Linear Park, North-West Preston).</p> <p>Main focus of LEP going forwards – enterprise zones incl. Samlesbury. Will have gravitational pull on security / cyber related industries going forward.</p> <p>Warton Enterprise Zone – more undeveloped enterprise zone, historically manufacturing, now more innovation-led technology industries. Has airfield</p>

Theme	Stakeholder Response Summary
	<p>and secure test facilities. Advanced mobility sectors e.g., drone technology, satellite / space.</p> <p>'Next Steps' social housing properties are outside of the normal allocations policies –these properties aim to help people build up a positive housing history so they are able to join housing register and get into permanent accommodation. There is a need for more intermediate accommodation which provides support for people in managing tenancies and gaining skills for independent living.</p> <p>Challenge around out-commuting from Lancashire – 130,000 out-commuters each day, of which 80,000 have NVQ Level 4+ qualifications. National Cyber Force creates new jobs at this level, aims to increase retention of workforce within Lancashire.</p>
<p>Potential barriers/threats for residential property market in Central Lancashire</p>	<p>'Gold plated' retirement villages - While these provide for an important component of specialist housing for older people (through models such as Extra Care and Integrated Retirement Communities) a potential disadvantage is their ability to serve others significant sectors of the market – will have much higher service charges that allow access to 2-3 hours' care which may not necessarily be needed by all residents potentially seeking specialist housing. Very expensive, 'top heavy' in terms of cost. Although there are longer-term recognised benefits in terms of reducing the number of years of ill-health and savings to the NHS residents may not see benefit of this for a number of years.</p> <p>Specialist accommodation providers mainly face issues acquiring land. Also, a frustration with planning classifications – should have separate designation between C2 and C3 – supported housing with some provision of care.</p> <p>Issue of need is not being grasped nationally e.g., Help to Buy has really stimulated first time buyer market, but hasn't been same emphasis at other end of line i.e., downsizing / needs for older persons housing. Needs to be a way to incentivise market to deliver retirement housing.</p> <p>Older persons housing is not a competitive product – there is looming housing crisis because of it. There is gulf between general needs housing and full residential care – little provision in the middle.</p> <p>House builders are having to become more 'savvy' – taking on zero carbon etc. but haven't allowed for this to date. Need for 'green' and stewardship aspect – how will this be viably delivered? Developers are being more accountable.</p> <p>County is most at risk under funding gap (unable to pay for highways / school delivery). Preston continuing to add funds to make up shortfall but will never make up all shortfall against the original list of priorities and commitments identified to secure the City Deal.</p> <p>Major outstanding issue could be a range of regeneration and public transport priorities. Sensibly these would be focused upon Preston and the other areas. May not be as costly, but need some money left over together with the Higher Education priorities.</p> <p>Build costs for housing have increased by 25% since 2018 – having viability implications</p> <p>The 'everyone in' scheme had an impact on seeking to reduce other forms of homelessness. Via hotels etc. this has led to increased pressure to provide permanent accommodation such as the Community Gateway scheme (from sheltered to supported accommodation – 20+ units). There is a sensitivity about making further suitable accommodation available to meet needs going forwards – as part of the Changing Futures programme.</p>

Theme	Stakeholder Response Summary
	<p>Fox Street shelter was previously providing shared temporary accommodation and was lost during the pandemic but this has been replaced.</p> <p>There is a limited pipeline of supported accommodation to meet future demand. Millbank and Foundations are the only other 2 schemes (plus two Social Services schemes for young people) – current provision is now working well to relieve pressure on housing stock from homeless 16-17 year olds (in the Foyer and Merryweather scheme) but will not necessarily meet future levels of need.</p>
<p>Impacts of Covid-19 on residential property market</p>	<p>During the pandemic, interest increased according to a housing association. People across entire housing portfolios were reviewing their housing needs. Huge boom in property market in past 18 months generally – people have reviewed living arrangements and feel that things need to change.</p> <p>During lockdown people reassessed needs, may have felt vulnerable and isolated outside a supportive community. People started looking at alternative options.</p> <p>Pandemic – lots of elderly deaths – have lost 50 tenants in one older persons' housing scheme. There is a stigma around care homes now so social housing providers are having some difficulty trying to fill these places. Lower demand for sheltered accommodation.</p> <p>Positive impact of pandemic – drive to get people off the street and into temporary accommodation. Extra demand for 1 bed properties to meet the needs of homeless population.</p> <p>A registered provider noted that they did change their criteria slightly with 3-beds – pre-pandemic it meant 2 of 3 bedrooms needed to be occupied. Now have changed criteria to reflect this – if couple can provide evidence, they're working from home they can be accepted for a 3-bed property now.</p> <p>There is a lack of movement through social housing sector, and people have been coming through service that would never previously have needed it (job loss / relationship breakdowns) – led to 'double whammy' of pressure on local authorities. Also lack of move-on opportunities for families e.g., going into mortgage debt / exploring shared ownership, due to economic hardship combined with inflation, increase in house prices.</p> <p>In the last year, buildings that have stood empty for a long time are now being redeveloped, especially in Preston City Centre e.g., for restaurants and new independent shops. Bigger units previously used for retail are being subdivided and used for other retail/leisure purposes. Seeing a bit of a 'boom' in Preston City Centre currently.</p> <p>Also, Chorley has recently had new cinema and bowling alley and redevelopment of existing shops. Leyland is also seeing growth in activity on its high street.</p> <p>Huge boom in property market in past 18 months generally – people have reviewed living arrangements and feel that things need to change.</p>
<p>Impacts of Brexit on residential property market</p>	<p>Biggest impact is loss of skills, high number of hard to fill vacancies – this has worsened because of Brexit. Less of an impact in Central Lancashire than areas on coast (where they have lost lots of Eastern European workers).</p>

5.13 The key headline findings from the developer and agent questionnaires are as follows:

- Strategic sites currently being promoted across Central Lancashire are primarily greenfield sites or urban extensions.
- Most strategic sites will deliver primarily market housing with a proportion of affordable housing (up to 35% in some cases).
- Developers have identified particular growing demand for housing in rural and semi-rural areas across Central Lancashire, particularly in areas of Chorley and South Ribble where recent growth has been relatively limited.
- Developers do not envisage fundamental changes to the scale and distribution of new housing supply based on demographics and existing market preferences. Any changes in distribution of growth would need to come through changes to planning policy and strategy.
- There is potential across Central Lancashire to respond to climate change by locating development in accessible locations close to strategic transport networks, encouraging sustainable travel and unlocking infrastructure improvements.
- There will continue to be a growing need to deliver both larger family housing as well as affordable homes for first-time buyers. The build-to-rent sector is also seeing continued levels of growth.
- Following the pandemic, there is growing demand for properties with sufficient outdoor space and space to facilitate home working.
- There is potential for housing delivery to equal or exceed rates seen over the past 10 years if it is not unduly constrained by lack of adequate supply.
- The housing market in Central Lancashire remains strong, despite the pandemic, and shows no signs of slowing down particularly given growing levels of demand for high quality homes. However, availability of construction materials and labour force is constraining build out rates to some extent.
- The biggest risks or constraints on delivery of housing in Central Lancashire going forwards are seen as being the planning system and planning regulation itself, lack of housing allocations and infrastructure constraints.

6.0 GROWTH SCENARIOS

- 6.1 This section uses the analysis in preceding chapters to define and undertake scenario testing of alternative approaches for the assessment of local housing need in order to determine whether these are appropriate for the circumstances in Central Lancashire. These scenarios also summarise the relationship between forecast economic and employment growth in terms of reflecting requirement for labour supply and demand as part of the local housing need assessment.
- 6.2 The LHN figures for the Central Lancashire authorities are based on the government's Standard Method, underpinned by the 2014-based household projections, which are linked to the 2014-based subnational population projections. As identified in Section 2 the latest 2018-based projections result in a *higher* level of population growth for each of the Central Lancashire authorities, with a different balance between the drivers of growth (natural change, internal, and international migration) compared to the 2014-based projections (see Figure 31 and Figure 32).
- 6.3 These differences are the result of the different historical time periods from which the projections draw their assumptions (as well as methodological changes made by ONS in the latest round of projections); the 5-year period preceding the 2014-based projections shows a lower level of population growth, likely influenced by lower housing completion rates over this time.
- 6.4 It is therefore important to consider the LHN figures within the wider demographic context, using the latest population statistics to establish whether (a) the LHN as calculated using the Standard Method adequately reflects each district's current and future demographic trends and market signals, and (b) whether calculating housing need using an alternative approach would better reflect each district's current and future demographic trends and market signals. It is also important to assess the size of each district's resident labour force, the level of jobs growth forecast, and whether more housing (than the Standard Method identifies) is required to support this.
- 6.5 Edge Analytics has used POPGROUP (PG) technology to develop a range of demographic scenarios for each of the Central Lancashire authorities. In the following section, the scenarios are defined. Further information on the POPGROUP methodology, data inputs and assumptions can be found in **Appendix 1**.
- a) Scenario Definition**
- 6.6 In POPGROUP, 13 scenarios have been configured, using the latest demographic statistics (Table 18). Analysis and presentation of these scenarios as part of this Housing Study responds to the requirements of national policy and guidance in circumstances where it would be appropriate to explore alternatives to the Standard Method. The justification for this is provided by the contents of this report, read as a whole, and specifically with reference to the background for plan-making outlined in Section 2. The range of scenarios identified reflect the context provided by the Planning Practice Guidance outlining that the Councils will be required to use the evidence provided by this Housing Study to demonstrate that any alternative approach adequately reflects current and future demographic trends and market signals (ID: 2a-015-20190220). The scenarios identified also allow further exploration of the qualification of the Standard Method provided by the PPG (ID: 2a-010-20201216) where it is recognised that the output of the calculation will not reflect changing economic circumstances or other factors that may impact upon demographic behaviour. The range of scenarios tested in this Housing Study also allow exploration of the relationship between levels of housing delivery and any difference compared to the Standard Method calculation.
- 6.7 The benchmark scenario is the 'Dwelling-led LHN' scenario, linked to the housing need

figures derived using the government's Standard Method. In a dwelling-led scenario, the annual change in the number of dwellings is used to derive a household and population growth profile, using key assumptions relating to dwelling vacancy, the communal population (i.e., population not in households), and rates of household formation (headship rates). Domestic migration is used to balance between population and dwelling growth; if the resident population is insufficient in size and structure to fill the additional dwellings, a higher level of net in-migration will result.

- 6.8 As the Standard Method (used to generate the LHN figures) includes an affordability uplift on top of the underpinning 2014-based household projections, the latest official projections are included here for comparison (and to highlight the additional level of migration needed to meet LHN above the baseline projection). The SNPP-2014 scenario replicates the 2014-based projections, whilst the SNPP-2018 scenario (and associated variants), replicates the 2018-based population projections. These scenarios have 2014 and 2018 base years respectively.
- 6.9 Three trend-based scenarios have also been developed, using alternative migration histories from which to calibrate future growth assumptions. These 'PG' trend scenarios are based on a continuation of short- (5-year), medium- (10-year) and long-term (19-year) migration histories and all incorporate a 2020 MYE base year. In these scenarios, fertility and mortality assumptions are drawn from the latest 2018-based ONS projection.
- 6.10 In all scenarios (including the **Dwelling-led LHN**), household and dwelling (housing) growth have been estimated using headship rate and communal establishment assumptions from the 2014-based household projection model (HH-14), and dwelling vacancy rates of 3.9% for Chorley, 4.6% for Preston and 3.4% for South Ribble, drawn from 2011 Census data. Note that in all scenarios (including the **Dwelling-led LHN**), no adjustments have been made to the underpinning headship rates; these are drawn directly from the 2014-based official projections. The scenario outcomes (e.g., population growth, annual net migration) are therefore comparable across all scenarios.
- 6.11 A final set of 'employment-led' scenarios have also been developed, underpinned by the employment forecasts from Cambridge Econometrics (CE) (see Section (e) below). These scenarios respond to the requirement to provide an assessment of market signals as part of exploring any different method to the Standard Method calculation (PPG ID: 2a-015-20190220; 2a-027-20190220). In these scenarios, the relationship between population and employment growth are modelled using key assumptions on economic activity rates, unemployment and commuting. Domestic migration is used to address any imbalance between the resident workforce and level of employment in the area. As with the dwelling-led scenario, a 5-year migration history has been used to derive future migration assumptions.
- 6.12 The economic activity rates (derived from Census statistics, with adjustments in line with OBR labour market analysis²⁸) determine the estimated annual change in size of the resident labour force, whilst the unemployment rates (from ONS) and commuting ratios (derived from Census statistics) link the labour force to workplace-based employment in each of the three local authorities.
- 6.13 Two 'commuting sensitivity' scenarios evaluate the impact of alternative commuting ratios on the growth outcomes of the Employment-led scenario. The first sensitivity (CR 2020), utilises updated 2020-based commuting ratios, as described in paragraphs 4.55 to 4.57. In the second sensitivity, the 2020 commuting ratios have been adjusted in each year of the forecast on the assumption that future jobs growth is provided for under a 1:1 commuting ratio (i.e., for every new job created in a district there is a resident worker available to fill it).

²⁸ OBR Fiscal Sustainability Report, July 2018

In practice, this assumes that each Central Lancashire authority provides sufficient growth in the resident labour force (adjusted for unemployment) so that the total growth in employed people indicated by the jobs forecast is matched (on a one-to-one basis) by growth in workers resident ('Resident Workers') in each constituent area. This scenario assumes that additional homes will be needed in the districts where additional jobs are created. In other words, the scenario assumes that all future employees will either need to live in the district where they work or already live there (i.e. there will be a sufficient resident workforce to support the jobs growth forecast by CE).

- 6.14 To derive the level of jobs growth that could be supported in each of the other scenarios, the economic activity rates, unemployment rate and baseline commuting ratio assumptions (i.e., the 2011 Census figures) have been applied to each of the scenario population growth trajectories.

Table 18 Scenario Definition

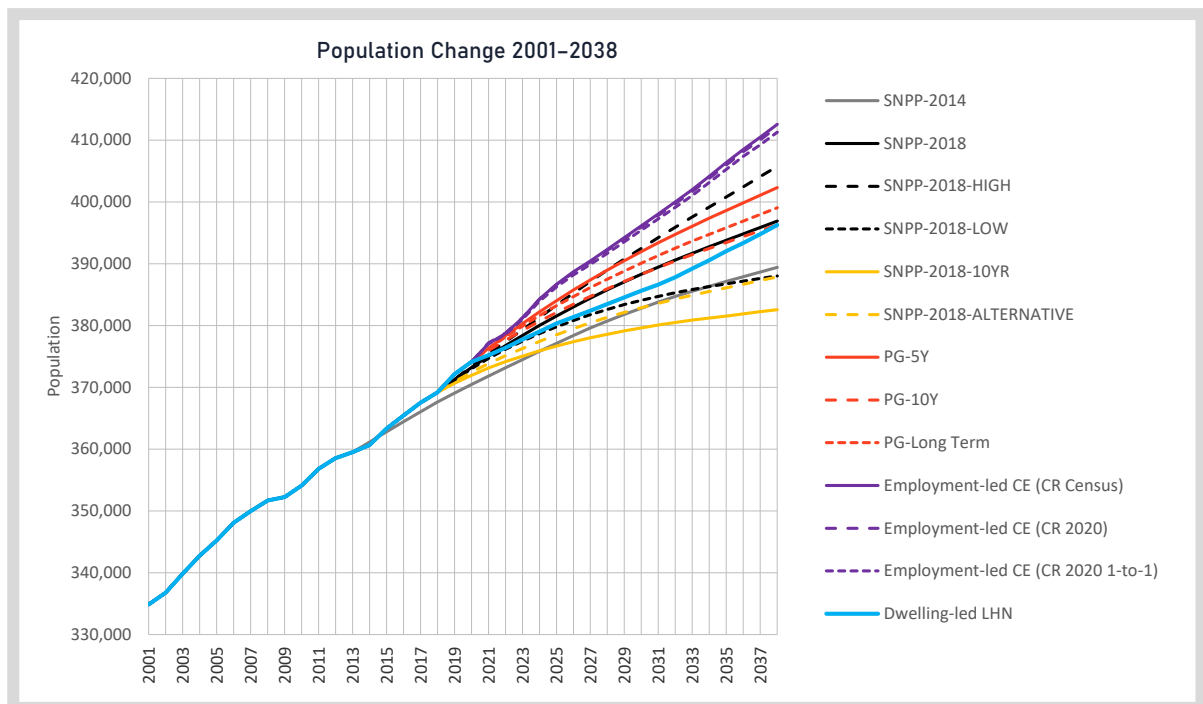
SNPP-2014	Replicates the ONS 2014-based SNPP population projection, using historical population evidence for 2001–2014.
SNPP-2018	Replicates the ONS 2018-based SNPP <i>Principal</i> population projection, using historical population evidence for 2001–2018, drawing internal migration assumptions from a two-year period (consistent with the new ONS HELM methodology).
SNPP-2018-HIGH	Replicates the ONS 2018-based SNPP <i>Higher Migration</i> population projection, using historical population evidence for 2001–2018. This variant assumes higher levels of net international migration.
SNPP-2018-LOW	Replicates the ONS 2018-based SNPP <i>Lower Migration</i> population projection, using historical population evidence for 2001–2018. This variant assumes lower levels of net international migration.
SNPP-2018-ALTERNATIVE	Replicates the ONS 2018-based SNPP <i>Alternative Internal Migration</i> population projection, using historical population evidence for 2001–2018. This variant uses five years of internal migration data to inform the projection: two years using ONS' new HELM methodology and three years using the previous ONS methodology.
SNPP-2018-10YR	Replicates the ONS 2018-based SNPP <i>10-year Migration</i> population projection, using historical evidence for 2001–2018. This variant uses 10 years of all migration data to inform the projection.
PG-5Y	Uses an ONS 2020 MYE base year, with migration assumptions calibrated from a 5-year historical period (2015/16–2019/20).
PG-10Y	Uses an ONS 2020 MYE base year, with migration assumptions calibrated from a 10-year historical period (2010/11–2019/20).
PG-Long-Term	Uses an ONS 2020 MYE base year, with migration assumptions calibrated from a 19-year historical period (2001/02–2019/20), including the UPC adjustment in the 2001/02–2010/11 MYEs.
Dwelling-led LHN	Models the population growth impact of the MHCLG's Standard Method target of +542 dpa for Chorley, +265 dpa for Preston and +181 dpa for South Ribble.
Employment-led CE (CR Census)	Models the population growth impact of an average employment growth of +328 per year for Chorley, +378 per year for Preston and +363 per year for South Ribble, as implied by the Cambridge Econometrics forecast. Uses 2011 Census commuting ratios fixed throughout the forecast period.
Employment-led CE (CR 2020)	Models the population growth impact of an average employment growth of +328 per year for Chorley, +378 per year for Preston and +363 per year for South Ribble, as implied by the Cambridge Econometrics forecast. Uses updated 2020 commuting ratios, fixed throughout the forecast period.
Employment-led CE (CR 2020 1-to-1)	Models the population growth impact of an average employment growth of +328 per year for Chorley, +378 per year for Preston and +363 per year for South Ribble, as implied by the Cambridge Econometrics forecast. Uses the updated 2020 commuting ratios, adjusted on the assumption that future jobs growth is provided for under a 1:1 commuting ratio.

b) Scenario Outcomes

i) Scenario Summary

6.15 The population growth trajectories for Central Lancashire are presented in Figure 38, from 2001 to 2038. In Table 19, each of the scenarios is summarised in terms of population and household growth for the 2023–2038 plan period, alongside the average annual net migration, and associated dwelling and employment growth outcomes. The benchmark LHN scenario is highlighted in grey. Comparable scenario outcomes for each of the three authorities are presented in **Appendix 2**.

Figure 38 Central Lancashire - Growth scenarios, 2001–2038



Source: ONS, Edge Analytics POPGROUP modelling

- 6.16 Population growth ranges from 2.0% under the **SNPP-2018-10YR** scenario, to 8.2% under the **Employment-led CE (CR Census)** scenario. This range of population growth equates to estimated dwelling growth outcomes between 663 and 1,364 dwellings per year (dpa). The LHN benchmark scenario (**Dwelling-led LHN**) sits in the middle of the range, resulting in a population growth outcome of 4.9% between 2023 and 2038, higher than both the latest official projections (albeit only slightly in the case of the 2018-based series) (**SNPP-2014** (4.0%) and **SNPP-2018** (4.9%)).
- 6.17 The **SNPP-2018-LOW**, **SNPP-2018-HIGH**, **SNPP-2018-ALTERNATIVE** and **SNPP-2018-10YR** scenarios provide alternative outcomes to the principal ONS **SNPP-2018** projection, incorporating variations in internal and international migration assumptions. With the exception of the **SNPP-2018-HIGH** projection (which assumes a higher level of net international migration), all result in *lower* growth outcomes than the central **SNPP-2018** scenario and the LHN benchmark.
- 6.18 The **PG-5Y**, **PG-10Y** and **PG-Long-Term** scenarios draw their migration assumptions from a 5-year, 10-year and 19-year history respectively, with a 2020 MYE base year. Growth is highest under the **PG-5Y** scenario, a reflection of the higher levels of population growth seen in the years preceding 2020 (see Figure 19, page 58). Under this scenario, an average

dwelling need figure of 1,102 per year is identified, linked to higher levels of net migration (1,288 per year) and higher levels of household growth compared to the LHN benchmark (9.7% growth compared to 8.8% growth). Only the **PG-5Y** and **PG-Long-Term** scenarios exceed the LHN growth outcomes, a reflection of the different population age structures that result from the varying migration flows.

- 6.19 For Central Lancashire as a whole, population and household growth outcomes are highest under the employment-led scenarios, a reflection of the higher levels of employment growth driving higher levels of net migration and changes to the population age structure. All employment-led scenarios result in dwelling growth outcomes that are higher than LHN and the scenarios based on the official projections series.
- 6.20 Employment growth under the trend scenarios ranges from 244 per year under the **SNPP-2018-10YR** scenario, to 980 per year under the **SNPP-2018-HIGH** scenario, all lower than the Cambridge Econometrics employment growth forecast (1,070 per year) i.e., the level of population growth implied by each scenario is insufficient to support the level of employment growth forecast by CE.

Table 19 Central Lancashire - Scenario outcomes, 2023–2038

Scenario	Change 2023–2038				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Employment	Dwellings
Employment-led CE (CR Census)	31,343	8.2%	19,647	12.0%	1,862	1,070	1,364
Employment-led CE (CR 2020)	30,879	8.1%	19,460	11.9%	1,835	1,070	1,351
Employment-led CE (CR 2020 1-to-1)	30,303	8.0%	19,208	11.8%	1,789	1,070	1,334
SNPP-2018-HIGH	26,455	7.0%	17,201	10.6%	1,525	980	1,195
PG-5Y	22,019	5.8%	15,848	9.7%	1,288	764	1,102
PG-Long-Term	19,140	5.0%	14,670	9.0%	1,093	776	1,020
Dwelling-led LHN	18,524	4.9%	14,226	8.8%	1,125	573	988
SNPP-2018	18,521	4.9%	13,935	8.6%	1,097	632	968
PG-10Y	17,146	4.5%	13,601	8.4%	1,031	586	945
SNPP-2014	14,935	4.0%	11,766	7.3%	370	245	817
SNPP-2018-ALTERNATIVE	11,587	3.1%	11,367	7.0%	746	362	789
SNPP-2018-LOW	10,582	2.8%	10,666	6.6%	668	283	741
SNPP-2018-10YR	7,515	2.0%	9,550	5.9%	503	244	663

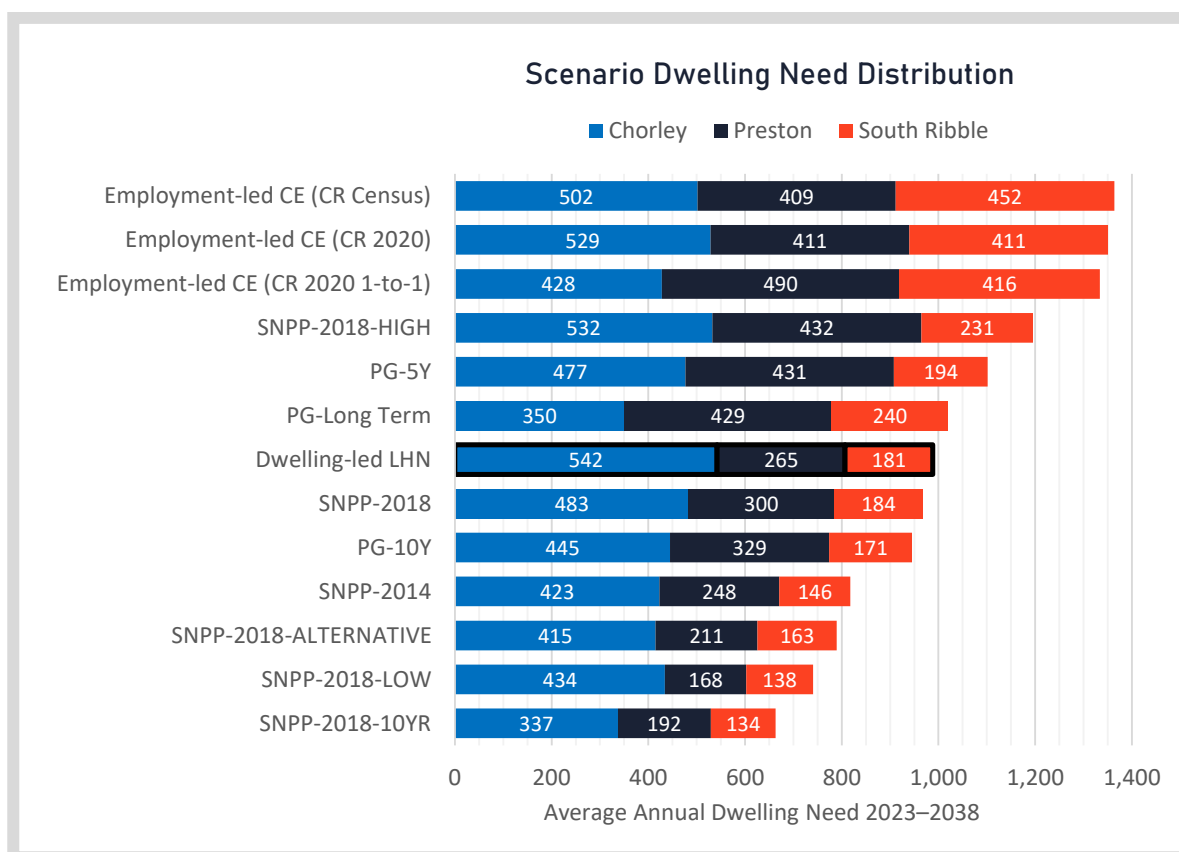
Source: ONS, Edge Analytics POPGROUP modelling. Note that employment growth outcomes under all trend and SNPP scenarios have been derived using the fixed 2011 Census commuting ratio assumptions.

ii) Housing Needs by Authority

- 6.21 When viewed at local authority level, the pattern of dwelling need under each of the scenarios

is generally more heavily weighted towards Chorley, reflecting the higher levels of population growth that are projected here (see **Appendix 2** for detailed local authority growth outcomes). Dwelling need outcomes are highest in Chorley in all but the **PG-Long-Term** and **Employment-led CE (CR 2020 1-to-1)** scenarios, where Preston sees a higher dwelling need outcome (Figure 39, Table 20).

Figure 39 Scenario dwelling need outcomes, 2023–2038



Source: ONS, Edge Analytics POPGROUP modelling.

- 6.22 In all but the employment-led scenarios, South Ribble sees a comparable share of the total dwelling need, at around 19% of the Central Lancashire total. In all three **Employment-led CE** scenarios, dwelling need outcomes are more evenly distributed between the three authorities, with South Ribble showing a higher level of dwelling need compared to the other scenarios (Figure 39, Table 20).
- 6.23 The differences in the dwelling need outcomes in the employment-led scenarios are a result of the different commuting ratio assumptions applied. With a fixed 2011 Census commuting ratio (as in the **CR Census** scenario), dwelling need is highest and this is a reflection of the relatively high fixed net out-commute in both Chorley and South Ribble. With a large net out-commute, a higher level of net internal migration is required to support the defined employment growth in these two authorities, which translates to a higher population growth outcome and a projected increase in the absolute number of out-commuters.
- 6.24 With a fixed 2020 commuting ratio (as in the **CR 2020** sensitivity), whilst the net out-commute is *higher* in Chorley (resulting in a higher dwelling need outcome), it is assumed that there is a small net *in*-commute in South Ribble. With a more ‘balanced’ commuting profile, and the level of employment greater than the size of the resident labour force, South Ribble sees a lower dwelling need outcome, comparable to the Preston figure (411 dpa in each area).

- 6.25 In the **Employment-led CE (CR 2020 1-to-1)** scenario, it is assumed that for every new 'job' created in the relevant area, there is a resident worker available to fill it i.e., each Central Lancashire authority provides sufficient growth in its resident workforce so that the total growth in employed people is matched on a one-to-one basis by growth in workers resident in each authority area. The 1:1 scenario assumes that additional homes will be needed in the districts where additional jobs are created. In other words, the scenario assumes that all future employees will either need housing in the district where they work or already live there (i.e. there will be a sufficient resident workforce to support the jobs growth forecast by CE).
- 6.26 For Chorley, the net out-commute *reduces* slightly over the forecast period, whereas in Preston and South Ribble the commuting ratio changes only slightly compared to the figures used in the **CR 2020** alternative. This results in a higher dwelling need in Preston (490 dpa), with the remainder of the need split more evenly between Chorley and South Ribble (428 and 416 dpa respectively).
- 6.27 At 1,334 per year, the dwelling need outcome resulting from the **Employment-led CE (CR 2020 1-to-1)** is higher than the LHN but supports the projected levels of employment growth seen under the CE forecast.

Table 20 Central Lancashire scenario summary – housing needs by authority, 2023–2038

Scenario	Average Annual Dwelling Need				Proportional Split		
	Chorley	Preston	South Ribble	Central Lancs	Chorley	Preston	South Ribble
Employment-led CE (CR Census)	502	409	452	1,364	37%	30%	33%
Employment-led CE (CR 2020)	529	411	411	1,351	39%	30%	30%
Employment-led CE (CR 2020 1-to-1)	428	490	416	1,334	32%	37%	31%
SNPP-2018-HIGH	532	432	231	1,195	45%	36%	19%
PG-5Y	477	431	194	1,102	43%	39%	18%
PG-Long Term	350	429	240	1,020	34%	42%	24%
Dwelling-led LHN	542	265	181	988	55%	27%	18%
SNPP-2018	483	300	184	968	50%	31%	19%
PG-10Y	445	329	171	945	47%	35%	18%
SNPP-2014	423	248	146	817	52%	30%	18%
SNPP-2018-ALTERNATIVE	415	211	163	789	53%	27%	21%
SNPP-2018-LOW	434	168	138	741	59%	23%	19%
SNPP-2018-10YR	337	192	134	663	51%	29%	20%

Source: ONS, Edge Analytics POPGROUP modelling

7.0 JUSTIFICATION FOR ALTERNATIVE APPROACHES TO ASSESSING HOUSING NEED IN CENTRAL LANCASHIRE

7.1 This section sets out the justification for applying alternative approaches for assessing housing need in Central Lancashire. This is explored in the context of national policy and guidance for joint plan-making²⁹ together with setting out the circumstances for considering alternative approaches where it may be appropriate to plan for a higher housing need figure than the Standard Method indicates³⁰. This section also provides consideration of whether there is an additional need identified through the requirements set out as part of City Deal for Preston and South Ribble, noting that this need is aspirational and tied to the delivery of key infrastructure across those areas in order for development to be realised.

a) Minimum Local Housing Need (LHN) as calculated using the Standard Method

7.2 The National Planning Policy Framework (NPPF) requires authorities to calculate the minimum number of homes needed per year (Local Housing Need, LHN) using the Standard Method as set out in Planning Practice Guidance (PPG). As detailed in Section 5 of this report, the Standard Method, as set out in PPG, is calculated using:

- Official household projections (2014-based household projections for a 10-year period i.e., 2022-2032);
- An adjustment to account for affordability; and
- A 'cap' to ensure deliverability.

7.3 The minimum LHN for each of the Central Lancashire authorities, as calculated using the Standard Method, is set out in Table 21.

Table 21 Minimum Local Housing Need (Standard Method)

	Chorley	Preston	South Ribble
Minimum Local Housing Need			
Local Housing Need (dwellings per annum, dpa)	542	265	181
Central Lancashire Total		985	
Proportional Split	55%	27%	18%

7.4 In all three authorities, the LHN figures are lower than recent average completion rates (see Table 22). This is most pronounced in Preston where completions over the last 5 years have averaged 712 dpa, which is considerably higher than the minimum housing need figure of 265 dpa.

²⁹ PPG ID: 2a-013-20201216

³⁰ PPG ID: 2a-010-20201216

Table 22 Net Dwelling Completions

	Average 2001/02– 2005/06	Average 2006–07– 2013/14	Average 2014/15– 2020/21
Chorley	519	455	575
Preston	569	388	712
South Ribble	515	244	390
Central Lancs	1,604	1,087	1,677

b) Approach for identifying Housing Need Scenarios

7.5 The NPPF states that the Standard Method should be used to calculate LHN “*unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals*” (NPPF, paragraph 61). The LHN calculated using the Standard Method is therefore a minimum starting point for determining the number of homes needed in a local authority area.

7.6 The Standard Method is sensitive to the characteristics of demographic and household change providing inputs to the 2014-based population and household projections³¹ it utilises – including where these reflect levels of housing delivery within the input period. Calculation of the Standard Method also does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

7.7 PPG identifies circumstances in which it may be appropriate to consider whether actual housing need is higher than the Standard Method indicates, stating:

“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the Standard Method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities

³¹ Household projections show the number of households there would be in England if a set of assumptions based on previous demographic trends in population – births, deaths and migration – and household formation were to be realised in practice, as further explained here: <https://blog.ons.gov.uk/2018/10/19/what-our-household-projections-really-show/>

and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

(PPG Paragraph: 010 Reference ID: 2a-010-20201216)

- 7.8 The PPG specifies that these factors need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). For Joint Plan-making the PPG further specifies it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area (ID: 2a-013-20201216).
- 7.9 To understand if housing need might be higher than that suggested by the Standard Method, in accordance with PPG, this report has therefore considered the following key demographic and market signal statistics for the three Central Lancashire authorities, including:
- Housing completion trends (net additional dwellings) (as shown in
 - Table 22)
 - Economic growth forecasts and the balance between labour demand and supply (including commuting flows)
 - Total population change
 - Population age profile change
 - Components of population change since 2001, including:
 - Natural change (births / deaths)
 - Net internal migration (between Central Lancashire and elsewhere in the UK, and between the Central Lancashire authorities)
 - Net international migration (migration to/from overseas)
- 7.10 The LHN figures (Table 21) were then considered within this wider demographic and growth context, using the latest population and employment growth statistics to establish (a) whether the LHN as calculated using the Standard Method adequately reflects each district's current and future demographic trends and market signals, and (b) whether calculating housing need using an alternative approach would better reflect each district's current and future demographic trends and market signals. It is also important to assess the size of each district's resident labour force, the level of jobs growth forecast, and whether more housing (than the Standard Method identifies) is required to support this.
- 7.11 As detailed in Section 6, a population and household forecasting tool called POPGROUP was used to develop a range of demographic scenarios for each of the Central Lancashire authorities. The housing need scenarios that were tested, including those derived using the POPGROUP model, are summarised again below.
- c) Alternative Approaches Relevant for Further Assessment within this Housing Study**
- 7.12 Only alternative approaches that identify a housing need figure higher than the Standard Method are considered reasonable for further assessment as part of this Housing Study. The Planning Practice Guidance answers the question of how any use of a different method will be tested and explains:

“Where an alternative approach results in a lower housing need figure than that identified using the Standard Method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the Standard Method. This will be tested at

examination. (ID: 2a-015-20190220)”

- 7.13 The PPG also explains that more recently published household projections are not, as a starting point, considered an appropriate basis for use in the Standard Method. The affordability adjustment applied as a mandatory part of the Standard Method calculation, for the reasons outlined in the PPG relating to household formation and the potential to increase opportunities for increasing workplace-based containment of commuting flows, are also important for the comparison of any different method given the potential for this adjustment to respond (in-part) to market signals and impact upon the demographic and household characteristics of the area (ID: 2a-006-20190220).
- 7.14 For the purposes of this Housing Study exceptional circumstances have not been identified that would support the exploration of any scenario that would result in a lower figure than the result of the Standard Method. Realistic assumptions for demographic growth, and resultant trends in household formation and composition considered in accordance with the 2014-based household projections strongly indicate projected change greater than that provided by the starting point for the Standard Method calculation.
- 7.15 No basis has been identified to suggest that the official statistics relied on to inform these inputs are unreliable in a manner that support assumptions for lower demographic growth than assumed under the calculation of local housing need. The opposite is true, to the extent the realistic assumptions that are informed by data that is considered to be reliable over longer-term or more recent (five-year) horizons would result in a higher starting point in terms of demographic growth.
- 7.16 Putting this in context, the result of the Standard Method (LHN) baseline, including application of the affordability uplift results in a calculation of annual dwelling need for Central Lancashire (as a standalone HMA) that only goes part-way to matching realistic alternative assumptions for demographic growth assessed over different time periods. It is therefore justified to explore these alternative scenarios in greater detail including their relationship with market signals.
- 7.17 The PPG supports the context that local housing need assessments may cover more than one area. Any different method explored within this context is expected to generate a figure for housing need within the defined area that should be at least the sum of the local housing need for each local planning authority within the area (ID: 2a-013-20201216). All of the alternative scenarios considered reasonable for further exploration satisfy this criterion in terms of producing annual dwellings figures exceeding the total result of the Standard Method calculation for the Central Lancashire authorities. By definition, this supports exploring the extent to which alternative realistic assumptions for demographic growth impact upon the overall housing need figure for Central Lancashire.

d) Housing Need Scenarios

- 7.18 The following housing need scenarios were therefore identified as reasonable alternative policy options:
- **Standard Method (LHN) Baseline** – This scenario is Local Housing Need as calculated using the Standard Method for each authority.
 - **POPGROUP 5-Year** – This scenario uses an ONS 2020 Mid-Year Estimate (MYE) base year, with migration assumptions calibrated from a 5-year historical period (2015/16–2019/20).
 - **POPGROUP Long-Term** – This scenario uses an ONS 2020 MYE base year, with migration assumptions calibrated from a 19-year historical period (2001/02–2019/20), including the Unattributable Population Change (UPC) adjustment in the 2001/02–2010/11 MYEs.

- **Employment-led Projection (2020 Commuting Ratios held constant)** – This scenario uses employment forecasts (from Cambridge Econometrics) and assumes that existing estimated commuting ratios remain constant over the 2023 to 2038 projection period.
- **Employment-led Projection (1:1 commuting for new jobs)** – This scenario uses employment forecasts (from Cambridge Econometrics) and an assumed commuting ratio of 1:1 linked to net additional jobs growth. This assumes that for every new job created in a district there is a resident worker available to fill it and no absolute change in levels of in-commuting or out-commuting. In other words, the 1:1 scenario assumes that additional homes will be needed in the districts where additional jobs are created i.e. the scenario assumes that all future employees will either need to live in the district where they work or already live there. There will be a sufficient resident workforce to support the jobs growth forecast by CE and no increase in the overall number of people currently commuting between Central Lancashire districts, or into the plan area from elsewhere, for work purposes. Table 23 below summarises the housing need figure under each scenario and the proportional split across the three Central Lancashire authorities compared with the average net completions over the last 5 years (2015/16 – 2020/21). The average net completions figures exceed the total annual dwelling need for Central Lancashire under all identified scenarios, but most closely aligns with the total dwelling need under the employment-led projection scenario.

Table 23 Housing Need Scenario Outcomes

Scenario	Average Annual Housing Need			Total	Proportional Split		
	Chorley	Preston	South Ribble		Chorley	Preston	South Ribble
LHN Baseline	542	265	181	988	55%	27%	18%
POPGROUP 5-Year	477	431	194	1,102	43%	39%	18%
POPGROUP Long-Term	350	429	240	1,019	34%	42%	24%
Employment-Led Projection (2020 Commuting Ratio)	529	411	411	1,351	39%	30%	30%
Employment-Led Projection (1:1 commuting for new jobs)	428	490	416	1,334	32%	37%	31%
Average net completions (last 5 years)	575	712	390	1,677	34%	43%	23%

Source: ONS; CLG; PopGroup; SPRU Analysis of various scenarios

7.19 Each housing need scenario for the Central Lancashire Local Plan in terms of justifying the selected level of housing need, is summarised in Table 24 below.

Table 24 Summary of Housing Need Scenarios

Scenario	Justification
Standard Method (LHN) Baseline	Standard approach for identifying 'minimum' housing need
POPGROUP 5 Year	A distribution and level of provision that reflects the POPGROUP migration scenarios.
POPGROUP Long-Term	A distribution that reflects to an extent at least the distribution of projected employment growth.
Employment-led projection (1:1 commuting ratio for new jobs) (one resident worker available to fill each new job created)	A distribution and level of provision that reflects the projected employment growth. Meets the Standard Method for all areas (with a potential 'undershoot' for Chorley). Additional allocations build in flexibility to ensure Standard Method is met. Meets (all/majority) of past rates of population growth for all + South Ribble uplift.

e) Employment-led Housing Need Scenario (1:1 commuting ratio for new jobs) – Recommended Option

- 7.20 On the basis of the above assessment the housing need scenario that is considered to be the recommended option is the **employment-led projection (1:1 commuting ratio)**.
- 7.21 At a total of 1,334 dpa, the housing need presented in this scenario is higher than the LHN baseline scenario of 988 dpa but is better aligned with the past completion trends (shown in
- 7.22 Table 22 above) and forecast levels of employment growth, and as such accords with appropriate circumstances set out in PPG for justifying an alternative assessment of housing need that exceeds the result of the Standard Method. All of the alternative scenarios considered reasonable for further exploration satisfy this criterion in terms of producing annual dwellings figures exceeding the total result of the Standard Method calculation for the Central Lancashire authorities. This supports exploring the proportional split of each scenario by authority. This reflects the extent to which applying alternative realistic assumptions for demographic growth affect the constituent Central Lancashire authorities differently and in effect generate a different 'distribution' of housing need based on the sum of the individual totals.
- 7.23 Whilst the overall need identified under this scenario is slightly lower than recent dwelling completion rates, it more closely aligns with average recent completions figures for South Ribble and Chorley, and overall for Central Lancashire, than any of the other tested scenarios. It also closely aligns with the existing Core Strategy requirement for each authority that was previously tested and found sound at examination, as well as the forecast average annual total deliverable supply across the three authorities of 1,614 dwellings per annum over the next five years (as at 31st March 2021).
- 7.24 The 'baseline' economic assumptions underpinning this scenario are based on forecasts provided by Cambridge Econometrics which are well-respected considered to provide a robust assessment of labour demand. The Lancashire LEP has also carefully considered the selection of the Cambridge Econometrics forecasts as part of its procurement process and

these data provide a consistent basis for plan-making across the County. For these reasons the employment-led housing need scenario (1:1 commuting ratio for new jobs) is the recommended option.

- 7.25 This scenario is broadly based on the employment growth forecasts for each of the three authorities provided by Cambridge Econometrics, and therefore reflects projected levels of employment growth and the levels of housing that will be required to support this.
- 7.26 A number of assumptions and adjustments have been applied in order to derive the housing need figures set out in this scenario. Most notably, this scenario assumes that future jobs growth is provided for under a **1:1 commuting ratio** i.e., for every new job created in a district there is a worker available to fill it. In practice, the 1:1 scenario assumes that additional homes will be needed in the districts where additional jobs are created. In other words, the scenario assumes that all future employees will either need to live in the district where they work or already live there. There will be a sufficient resident workforce to support the jobs growth forecast by CE and no increase in the overall number of people currently commuting between Central Lancashire districts, or into the plan area from elsewhere, for work purposes...
- 7.27 This is considered more consistent with the PPG and the underlying objectives of the calculation of the Standard Method, which includes in the justification for its affordability adjustment increasing opportunities for people to live near where they work (ID: 2a-006-20190220). It is apparent from the analysis that this has not been achieved as part of recent delivery trends and that the objective would not be best addressed by planning for the result of the Standard Method (including its provision of an uplift at step 3 in accordance with the PPG). Reliance on the Standard Method outputs has the potential to make travel patterns even less sustainable by increasing inter-district commuting.
- 7.28 Testing of the 1:1 scenario enables consideration of changing economic circumstances (based on the relevant Cambridge Econometrics employment forecast) and the potential impact of these forecasts in the context of demographic trends (including those resulting partly from recent levels of housing delivery) in a way that cannot be achieved using inputs to the Standard Method or by holding commuting ratios constant in all years of the projection. The 1:1 projection will assist in redressing the commuting balance between the three authorities and will not rely on any absolute increase in additional in-commuting to Central Lancashire from elsewhere. This is consistent with the PPG for the purposes of considering alternatives to the Standard Method (ID: 2a-010-20201216).
- 7.29 In reaching this conclusion it is relevant to note that Preston, as the main economic centre in Central Lancashire, has the highest annual forecast employment growth (378 jobs per annum), followed by South Ribble (see Table 26 below).
- 7.30 Central Lancashire has a high-level of commuting self-containment – the vast majority of residents live and work in the area but not necessarily within the same local authority boundary. The 2011 Census recorded the greatest flow from South Ribble to Preston (13,492 people) followed by Chorley to South Ribble (6,537 people). The overall net commuting flows to/from each authority in 2011 are shown in Table 26. These flows are then converted to commuting ratios - a commuting ratio larger than 1 indicates a net out-commute, and less than 1 a net in-commute.
- 7.31 Ahead of the results of the 2021 Census being released an updated Commuting Ratio has been derived to show the effect of recent changes. The 2020 employment figure has been drawn from the Cambridge Econometrics forecast for each of the three local authorities, adjusted to account for 'double jobbing' (see **Appendix 1**). Through the application of the economic activity rates and the latest unemployment rates to the 2020 mid-year population estimate, the size of the resident workforce in each authority has been derived.

7.32 This analysis suggests that the commuting balance in Preston has remained unchanged, at 0.74 (indicating a net in-commute) but the number of in-commuters has increased in real terms. In Chorley the net out-commute has increased, meaning the growth in the size of the resident workforce has been larger than the growth in the level of employment in Chorley. In South Ribble, the commuting balance has shifted from a net out-commute to a small net in-commute – likely a result of ageing and low population growth within the authority and recent increases in jobs growth.

Table 25 Summary of Net Commuting Flows and Commuting Ratios

LPA		2011	2020	2038 - using 2020 Ratio	2038 – Using 1:1 ratio for future jobs
Chorley	Net Flow	-12,042	-17,131	-19,454	-17,131
	Ratio	1.29	1.39	1.39	1.35
Preston	Net Flow	+23,008	+24,285	+25,949	+24,285
	Ratio	0.74	0.74	0.74	0.76
South Ribble	Net Flow	-6,279	+1,065	+1,176	+1,065
	Ratio	1.14	0.98	0.98	0.98

Source: ONS; Cambridge Econometrics; Annual Population Survey; SPRU Analysis

- 7.33 Comparing with the range of scenarios summarised in Table 23, planning to hold the 2020 Commuting Ratios constant would negate the differences in the jobs forecast, with Chorley producing the highest total for housing need which in part reflects that scenario generating an absolute increase in out-commuters that would at least in-part be expected to support employment growth elsewhere.
- 7.34 For Preston, use of constant 2020 Commuting Ratios would yield lower housing need than either the Long-Term of Five-Year demographic scenarios (411dpa versus 431dpa or 429dpa). This illustrates why use of the ratio to generate an absolute increase of in-commuters taking up part of the net additional employment growth would depart from past trends (including those associated with the recent upturn in delivery that is supporting increased population growth) at the expense of reinforcing potentially unsustainable commuting patterns.
- 7.35 The 1:1 scenario therefore assumes no change in absolute levels of in-commuting or out-commuting alongside meeting the forecast additional jobs growth (which otherwise occurs when commuting ratios are held constant). This scenario reduces net additional in-commuting to Preston and net out-commuting from Chorley, leading to a change in the relative proportions of housing need at least partly attributable to previous trends in housing delivery between the Central Lancashire authorities (i.e., out-commuting from Chorley has increased since 2011 due to fewer new homes provided close to employment growth elsewhere in Central Lancashire). South Ribble does not experience any increase in in-commuting to meet baseline employment growth, which necessitates a significant uplift on previous delivery levels.
- 7.36 The 1:1 commuting ratio adjustments that have been applied to this scenario are considered to be preferable to the employment-led projection that uses the 2020 commuting ratio (see

comparison of outputs in Table 23 above) for the reason that this assumes a more sustainable pattern of commuting by assuming that each new job is filled by someone living within the same authority, rather than exacerbating existing patterns of commuting in which more people commute out of Chorley and into Preston for work.

- 7.37 Under this recommended scenario, the need for housing is therefore assumed to be met in the same district as where the jobs are expected to be located.
- 7.38 Table 26 provides a breakdown of what this scenario means for each authority in terms of assumed population change, household change, net migration, employment and dwellings equivalent.

Table 26 Employment-Led Housing Need Scenario Summary

Area	Change 2023 - 2038				Average per year		
	Population Change	Population Change%	Households Change	Households Change%	Net Migration	Dwellings	Employment
Central Lancashire	30,303	8.0%	19,208	11.8%	1,789	1,334	1,070
Chorley	9,508	7.8%	6,168	11.7%	866	428	328
Preston	10,263	7.0%	7,013	11.4%	160	490	378
South Ribble	10,531	9.3%	6,028	12.2%	763	416	363

8.0 NEXT STEPS

- 8.1 The recommended housing need scenario set out in Table 26 (employment-led projection, 1-to-1 commuting ratio) provides a total housing need figure for the whole Central Lancashire Local Plan area (i.e. 1,334 dpa), which is the sum of individual housing need figures for the constituent local planning authorities. In accordance with PPG (ref. 2a-013-20201216) once this housing need figure has been agreed it will then be for the Central Lancashire authorities to determine how much of the overall need can be accommodated within Central Lancashire, and whether each district can accommodate its own need in full, before determining the housing requirement(s) for the plan area and each individual authority area.. It is recommended that an assessment of the size, type, and tenure of housing needed for different groups in Central Lancashire is considered as part of this process and used to inform policy-based decisions about the amount of housing to be planned for in each district..
- 8.2 The final housing requirement or requirements set in the Joint Local Plan may be different to the relative proportions within the recommended dwelling need scenario, depending on the Councils' further assessment of policy-on and plan-making considerations.
- 8.3 The findings and recommendations of this Housing Study report can therefore be used to inform the preparation of planning policies including through exploring and identifying options for addressing housing need across the three authorities, and then setting out a preferred approach.

APPENDIX 1 POPGROUP FORECASTING METHODOLOGY & ASSUMPTIONS (EDGE ANALYTICS)

POPGROUP Forecasting Methodology & Assumptions

POPGROUP

- A.1 POPGROUP is a suite of demographic models used to derive forecasts of population, households, and labour force, for areas and social groups. The main POPGROUP model (Figure 27) is a 'cohort component' model, which enables the development of population forecasts based on births, deaths and migration inputs and assumptions.

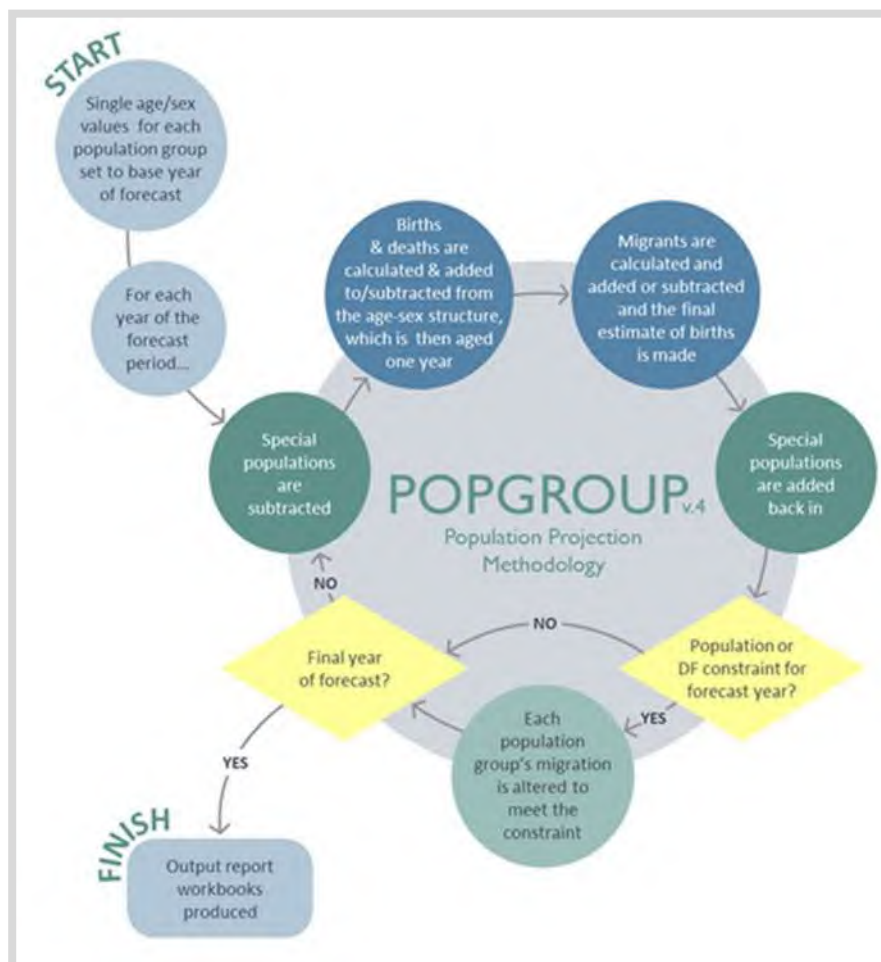


Figure 27: POPGROUP Population Projection Methodology

- A.2 The Derived Forecast (DF) model sits alongside the population model (Figure 28) providing a headship rate model for household projections and an economic activity rate model for labour force and employment projections. Further information on POPGROUP can be found on the Edge Analytics [website](#).

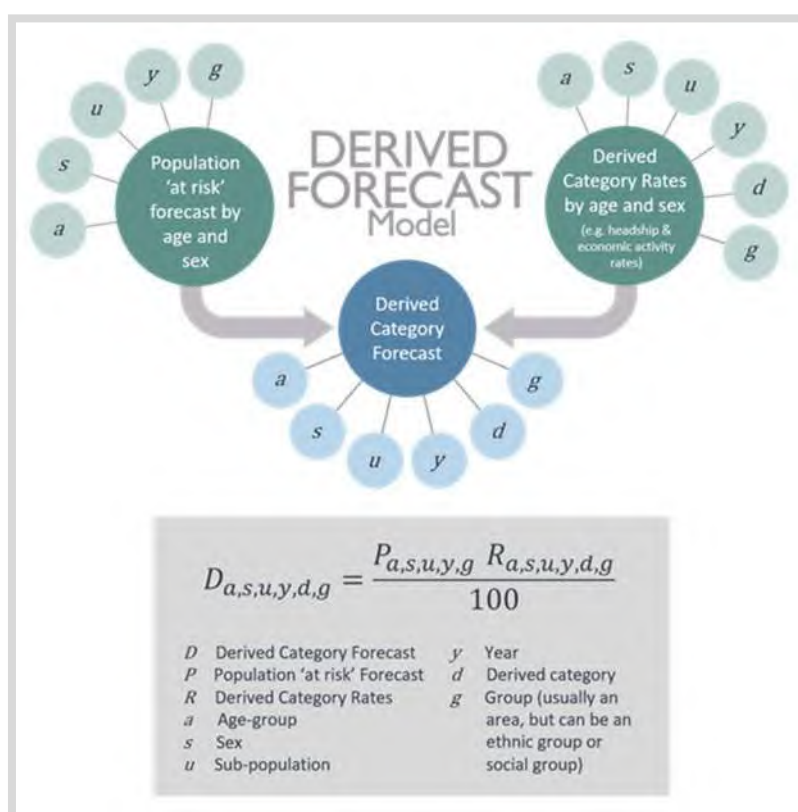


Figure 28: Derived Forecast (DF) Methodology

Scenario Inputs & Assumptions

Population

A.3 In each scenario, historical population statistics are provided by ONS mid-year population estimates (MYEs), with all data disaggregated by single year of age and sex. MYEs are used up to the respective base years of each scenario. From the base year onwards, future population counts are estimated by single year of age and sex, using the defined assumptions on fertility, mortality, and migration. The **SNPP** scenarios use the MYEs up until their respective 2014 and 2018 base years. The **PG** and **Dwelling-led** scenarios use the ONS 2020 MYE as their base year.

Births & Fertility

A.4 In each scenario, historical mid-year to mid-year counts of births by sex have been sourced from the ONS MYEs. Under the **SNPP** scenarios, historical counts of births have been used until each scenario's base year.

A.5 For the **PG**, **Dwelling-led** and **Employment-led** scenarios, birth counts are applied from 2001/02 to 2019/20. From 2020/21, an area-specific and age-specific fertility rate (ASFR) schedule is derived from the 2018-based SNPP. In combination with the 'population at risk' (i.e., all women between the age of 15–49), these ASFR assumptions provide the basis for the calculation of births in each year of the forecast period.

A.6 In each of the **SNPP** scenarios, counts of births are defined from the base year onwards, to ensure consistency with the official population projections.

Deaths & Mortality

A.7 In each scenario, historical mid-year to mid-year counts of deaths by sex and 5-year age-group have been sourced from the ONS MYEs. Under the **SNPP** scenarios, historical counts of deaths have been used until each scenario's base year.

A.8 For the **PG**, **Dwelling-led** and **Employment-led** scenarios, counts of deaths by age and sex are applied from 2001/02 to 2019/20. From 2020/21, an area-specific and age-specific mortality rate (ASMR) schedule is derived from the latest 2018-based SNPP.

A.9 In each of the **SNPP** scenarios, counts of deaths are defined from the base year onwards, to ensure consistency with the official population projections.

Internal Migration

A.10 In each scenario, historical mid-year to mid-year estimates of internal in- and out-migration by five-year age-group and sex have been sourced from the 'components of population change' files that underpin the ONS MYEs.

A.11 In the **SNPP** scenarios, these historical estimates are used up to each respective base year, with future counts of migrants defined, to remain consistent with the official projections.

A.12 Under the **PG** scenarios, an area and age-specific migration rate (ASMigR) schedule is derived from a defined number of years of historical internal migration data, which then determines the future number of internal in- and out-migrants for the remainder of the plan period. For the **PG-5Y** scenario, this is derived from five years of historical data (2015/16–2019/20), for the **PG-10Y** scenario, this is derived from ten years of historical data (2010/11–2019/20) and for the **PG-Long-Term** scenario, this is derived from the full nineteen years of historical data (2001/02–2019/20).

A.13 Under the **Dwelling-led** and **Employment-led** scenarios, future internal migration rate assumptions have been derived from a five-year historical period (**PG-5Y**), with the level of internal migration altered by the model to meet defined annual dwelling and employment growth targets.

International Migration

A.14 Historical mid-year to mid-year estimates of immigration and emigration by five-year age-groups and sex have been sourced from the 'components of population change' files that underpin the ONS MYEs.

A.15 In the **SNPP** scenarios, these historical estimates are used up to each respective base year, with future counts of migrants defined, to remain consistent with the official projections.

A.16 In the **PG-5Y**, **PG-10Y** and **PG-Long-Term** scenarios, historical counts of immigration are used from 2001/02 to 2019/20. From 2020/21, future international migration counts are based on the area-specific historical migration data, using a five-year, ten-year and nineteen-year migration history. An

ASMigR schedule of rates is derived from the migration history and used to distribute the future counts by single year of age.

- A.17 Under the **Dwelling-led** and **Employment-led** scenarios, future international assumptions are derived from a five-year historical period (**PG-5Y**).

Households & Dwellings

- A.18 The 2011 Census defines a *household* as, “*one person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room or sitting room or dining area*”. In POPGROUP, a *dwelling* is defined as a unit of accommodation which can either be occupied by one household or can be vacant.
- A.19 The household and dwelling growth implications of each scenario are estimated through the application of communal population statistics, household representative rates (headship rates), and a dwelling vacancy rate. These assumptions have been sourced from the 2011 Census, and the MHCLG 2014-based household projection model. In a **Dwelling-led** scenario, these assumptions are used to derive the level of population growth required to meet defined dwelling-growth target.

Communal Population Statistics

- A.20 Household projections in POPGROUP exclude the population ‘not-in-households’ (i.e., the communal/institutional population). These data are drawn from the 2014-based household projections, which use statistics from the 2011 Census. Examples of communal establishments include prisons, residential care homes, student hall of residence, and certain armed forces accommodation.
- A.21 For ages 0–74, the number of people in each age-group ‘not-in-households’ is fixed throughout the forecast period. For ages 75–85+, the population ‘not-in-households’ varies across the forecast period depending on the size of the population.
- A.22 The communal population statistics are therefore used to derive the size of the private household population in each scenario.

Household Representative Rates

- A.23 A household representative rate is defined as the “*probability of anyone in a particular demographic group being classified as being a household representative*”²³
- A.24 The household representative rates used in the POPGROUP modelling have been drawn from the MHCLG 2014-based household projection model, which is underpinned by the ONS 2014-based SNPP. The household projections are derived through the application of projected headship rates to a projection of the private household population (i.e. the total population *minus* the communal population). The methodology used by MHCLG in its household projection model consists of two stages:

²³ MHCLG 2014-based Household Projections

- **Stage One** produces the national and local authority projections for the total number of households by sex, age-group and relationship-status group.
- **Stage Two** provides the detailed ‘household-type’ projection by age-group, controlled to the previous Stage One totals.

A.25 In each POPGROUP scenario, the **Stage Two** headship rates have been applied by age-group, sex and ‘household type’ (Table 11) to the private household population to derive the number and type of households.

Table 11: MHCLG 2014-based Stage Two household type classification

MHCLG Category	Description
One person male	One person households: Male
One person female	One person: Female
Couple no child	One family and no others: Couple households: No dependent children
Cple+adlts no child	A couple and one or more other adults: No dependent children
One child	Households with one dependent child
Two children	Households with two dependent children
Three+ children	Households with three or more dependent children
Other households	Other households with two or more adults

Vacancy Rate

A.26 The relationship between households and dwellings is modelled using a ‘vacancy rate’, derived from the 2011 Census, using statistics on households (occupied household spaces) and dwellings (shared and unshared). Vacancy rates of 3.9% for Chorley, 4.6% for Preston and 3.4% for South Ribble have been applied and fixed throughout the forecast period. Using these vacancy rates, the number of dwellings needed to meet the household growth trajectory has been estimated.

Labour Force & Employment

A.27 In each of the **SNPP**, **PG** and **Dwelling-led** scenarios, economic activity rates, an unemployment rate and a commuting ratio are applied to the population growth trajectory, to derive the size of the resident labour force, and the level of employment growth that could be supported in each of the three authorities.

A.28 In the **Employment-led CE** scenario, these assumptions have been used to derive the level of population growth required to support the level of employment growth as defined by the CE economic forecast.

A.29 Detail on these inputs and assumptions are as follows.

Economic Activity Rates

A.30 Economic activity rates are the proportions of population that are actively involved in the labour force, either employed or unemployed looking for work. Economic activity rates by five-year age group (16–

89) and sex have been derived from Census statistics, with adjustments made in line with the OBR analysis of labour market trends in its 2018 Fiscal Sustainability Report²⁴ (Figure 29).

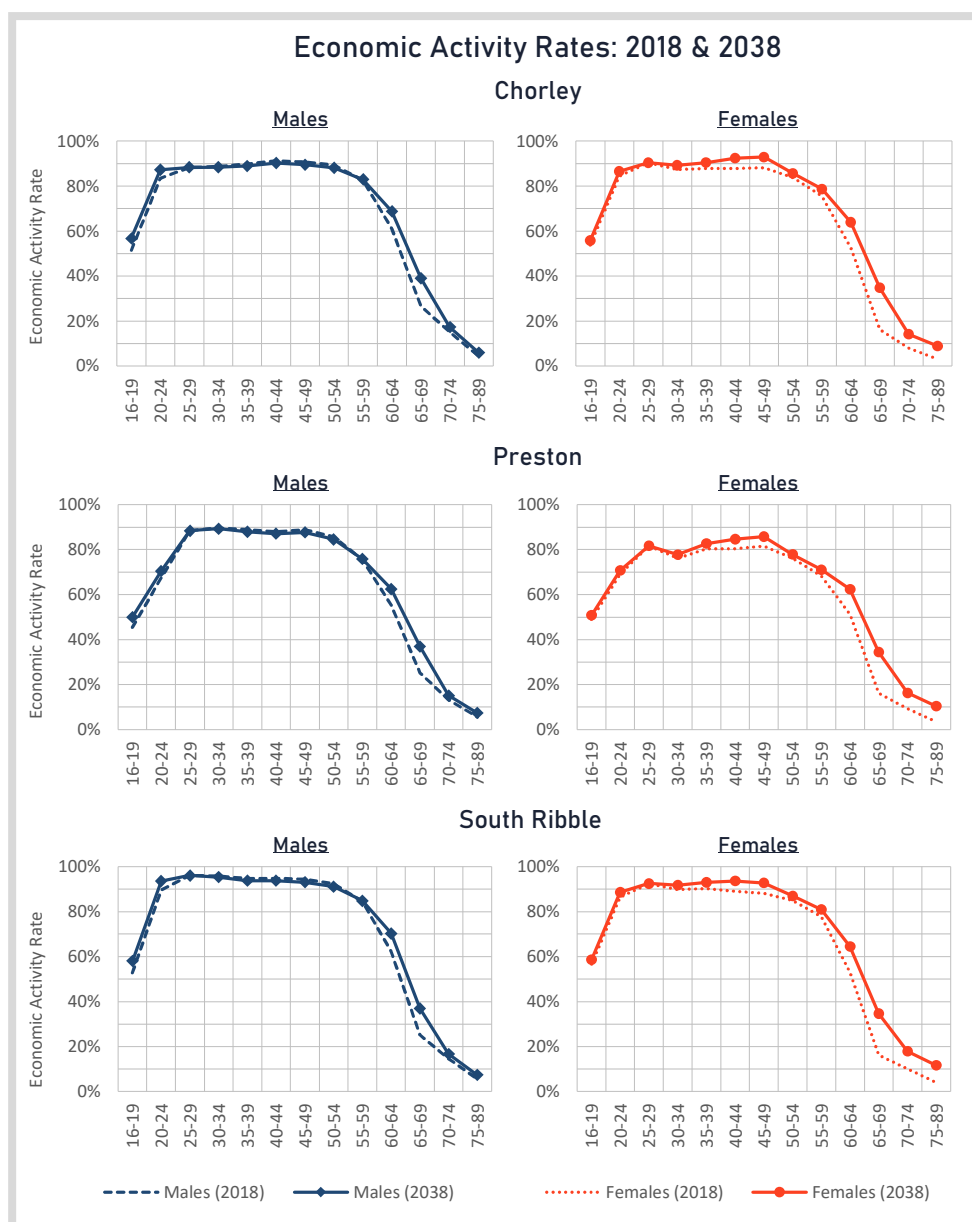


Figure 29: Economic Activity Rates, 2018 & 2038

Commuting Ratio

A.31 The commuting ratio measures the balance between the level of employment in an area, and the number of resident workers. A commuting ratio greater than 1.00 indicates that the size of the resident workforce exceeds the level of employment available in the area, resulting in a net out-commute. A commuting ratio less than 1.00 indicates that employment in the area exceeds the size of the labour force, resulting in a net in-commute.

²⁴ OBR Fiscal Sustainability Report, July 2018

A.32 In the **SNPP, PG, Dwelling-led and Employment-led CE (CR Census)** scenarios, 2011 Census commuting ratios have been applied and fixed throughout the forecast period. The 2011 Census recorded a net out-commute for both Chorley and South Ribble, with commuting ratios of 1.29 and 1.14 respectively. A net in-commute was recorded in Preston (0.74) (Table 12).

Table 12: 2011 Census commuting ratios

Local Authority	Number of resident workers	Employment	Commuting Ratio
Chorley	53,890	41,848	1.29
Preston	64,462	87,470	0.74
South Ribble	56,036	49,307	1.14

Source: 2011 Census. Note that these measures are people-based.

A.33 The commuting ratios used in the **Employment-led CE (CR 2020)** scenario have been derived using the 2020 level of employment from the CE forecasts, and a derived labour force from the 2020 MYE. These calculations have resulted in an increased net-outcome for Chorley (1.39), no change in the commuting ratio in Preston (0.74) and a shift from a net out-commute to a net in-commute in South Ribble (0.98), when compared to the 2011 Census ratios. These ratios have been fixed throughout the forecast period.

Table 13: Updated 2020 commuting ratios

Local Authority	Number of resident workers	Available employment	Commuting Ratio
Chorley	60,306	43,281	1.39
Preston	69,369	93,478	0.74
South Ribble	57,685	58,747	0.98

A.34 In the **Employment-led CE (CR 2020 1-to-1)** scenario, the 2020 commuting ratios have been adjusted in each year of the forecast on the assumption that future jobs growth is provided for under a 1:1 commuting ratio (i.e. for every new job created in a district there is a worker available to fill it). In practice, this assumes that each Central Lancashire authority provides sufficient growth in the resident labour force (adjusted for unemployment rates) so that the total growth in employed people indicated by the jobs forecast is matched (on a one-to-one basis) by growth in workers resident ('Resident Workers') in each constituent area.

A.35 The commuting ratio profiles applied in the scenarios are summarised in Figure 30.

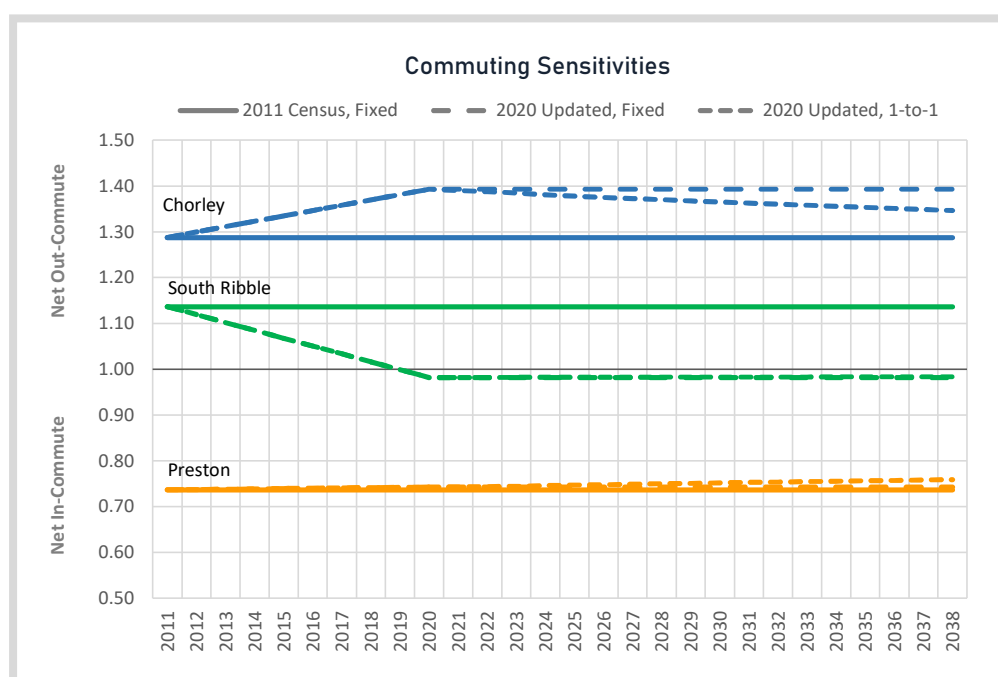


Figure 30: Commuting Ratio Sensitivities
Source: 2011 Census, OBR, CE, Edge

Unemployment

A.36 The unemployment rate is the proportion of unemployed people within the economically active population. Historical unemployment rates are sourced from ONS model-based estimates. For Chorley, Preston and South Ribble, the 2021 rates of 4.2%, 5.4% and 3.2% have been applied respectively. These rates have been applied in each scenario and fixed throughout the forecast period.

Employment Forecasts

A.37 The **Employment-led CE** scenario models the demographic impact of a projected level of annual employment growth, drawn from the Cambridge Econometrics employment growth projections for Chorley, Preston and South Ribble.

A.38 To account for 'double jobbing' (i.e. people who may have more than one job), an adjustment has been made in each year of the CE forecast, to reduce the employment figures by 4.5% in Chorley, 3.8% in Preston and 3.3% in South Ribble. This double jobbing adjustment is based on the proportion of people with second jobs as recorded in the Annual Population Survey (APS), averaged over the 2004–2021 period²⁵.

A.39 In an employment-led scenario, the key assumptions relating to economic activity, commuting and unemployment detailed above are used to determine the level of population growth needed to support the defined level of jobs growth.

²⁵ APS - Second Jobs by Industry (Table 16a), and Total Employment (Table 32).

A.40 The CE employment forecast, with the double jobbing adjustment, projects higher growth across all three authorities in the first three years of the plan period, with growth levelling of thereafter (Figure 31).

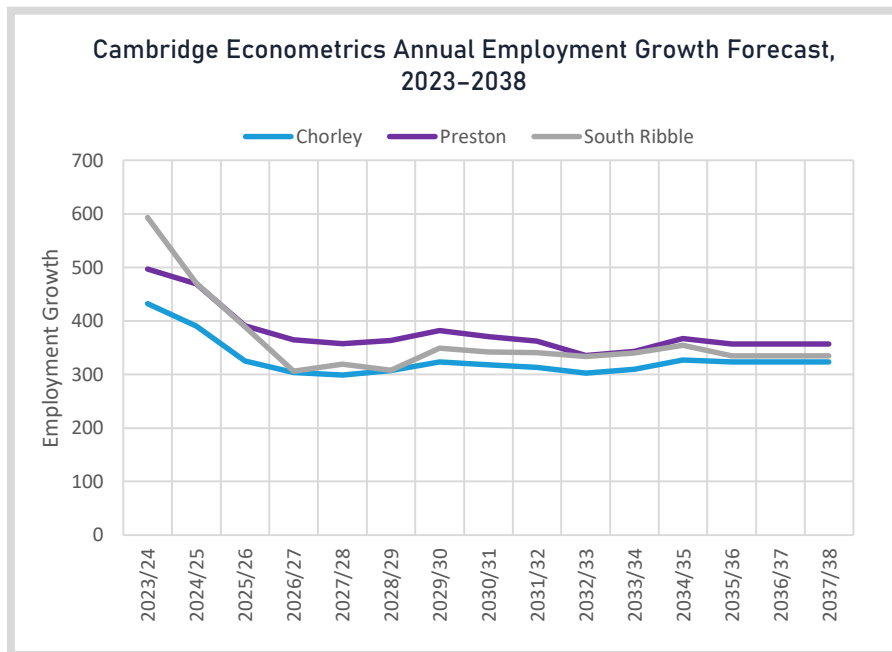


Figure 31: Cambridge Econometrics employment growth forecasts, 2023–2038
 Note: The CE forecast only runs to 2036; growth has been fixed thereafter.

APPENDIX 2 LOCAL AUTHORITY SCENARIO OUTCOMES (EDGE ANALYTICS)

Local Authority Scenario Outcomes

Area Summary

- A.41 Population growth in Chorley ranges from 5.4% under the **SNPP-2018-10YR** scenario, to 10.8% under the **SNPP-2018-HIGH** scenario (Figure 32, Table 14). This range of population growth equates to an estimated dwelling growth outcome of 337 to 532 dpa, and an average annual employment growth of between 186 and 362.
- A.42 Population growth in Preston ranges from 0.0% under the **SNPP-2018-LOW** scenario, to 7.0% under the **Employment-led CE (CR 2020 1-to-1)** scenario (Figure 33, Table 15). This range of population growth equates to an estimated dwelling growth outcome of 168 to 490 dpa, and an average annual employment growth of between 34 and 491.
- A.43 Population growth in South Ribble ranges from 0.8% under the **SNPP-2018-10YR** scenario, to 10.5% under the **Employment-led CE (CR Census)** scenario (Figure 34, Table 16). This range of population growth equates to an estimated dwelling growth outcome of 134 and 452 dpa, and an average annual employment growth of between -25 and 363.

Chorley

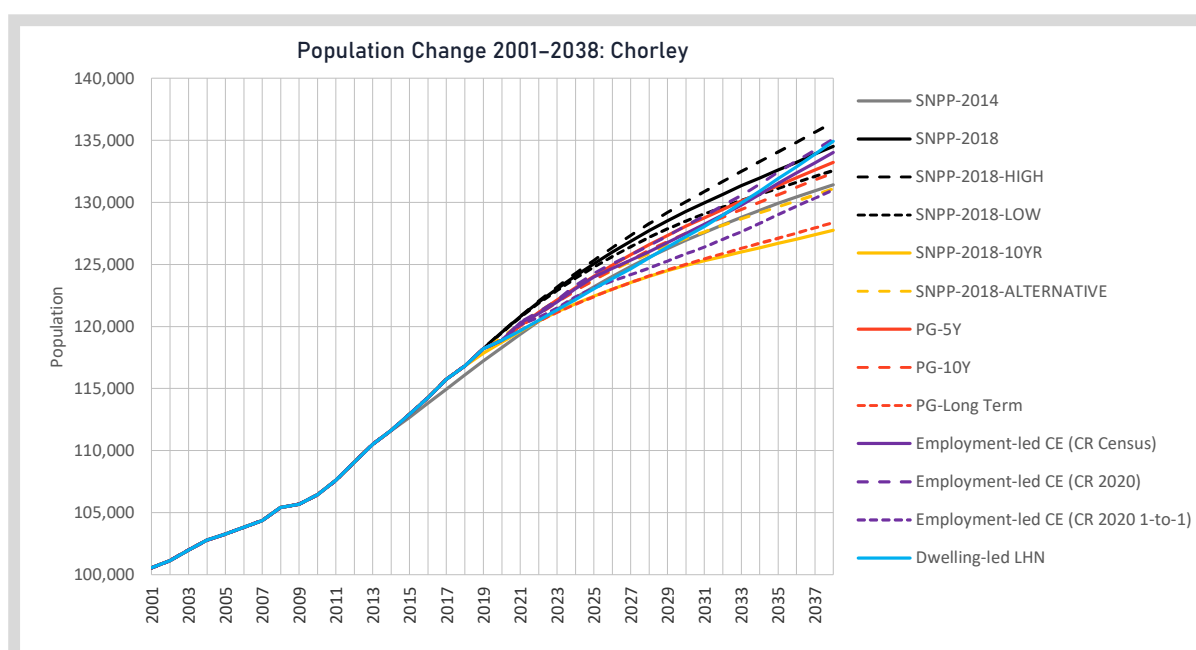


Figure 32: Chorley - Growth scenarios, 2001-2038
Source: ONS, Edge Analytics POPGROUP modelling

Table 14: Chorley – Scenario outcomes, 2023-2038

Scenario	Change 2023-2038				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Employment
Dwelling-led LHN	13,585	11.2%	7,809	14.9%	1,124	542	377
SNPP-2018-HIGH	13,282	10.8%	7,672	14.4%	1,099	532	362
Employment-led CE (CR 2020)	12,993	10.6%	7,619	14.4%	1,080	529	328
Employment-led CE (CR Census)	12,058	9.9%	7,230	13.7%	1,023	502	328
SNPP-2018	11,472	9.3%	6,966	13.1%	998	483	305
PG-5Y	11,093	9.1%	6,872	13.0%	957	477	296
PG-10Y	10,432	8.6%	6,410	12.2%	914	445	269
SNPP-2014	10,034	8.3%	6,093	11.7%	671	423	186
SNPP-2018-LOW	9,658	7.9%	6,259	11.8%	897	434	248
Employment-led CE (CR 2020 1-to-1)	9,508	7.8%	6,168	11.7%	866	428	328
SNPP-2018-ALTERNATIVE	8,983	7.4%	5,979	11.3%	841	415	227
PG-Long Term	7,243	6.0%	5,043	9.6%	714	350	196
SNPP-2018-10YR	6,582	5.4%	4,858	9.3%	701	337	168

Source: ONS, Edge Analytics POPGROUP modelling. Note that employment growth outcomes under all trend and SNPP scenarios have been derived using the fixed 2011 Census commuting ratio assumptions.

Preston

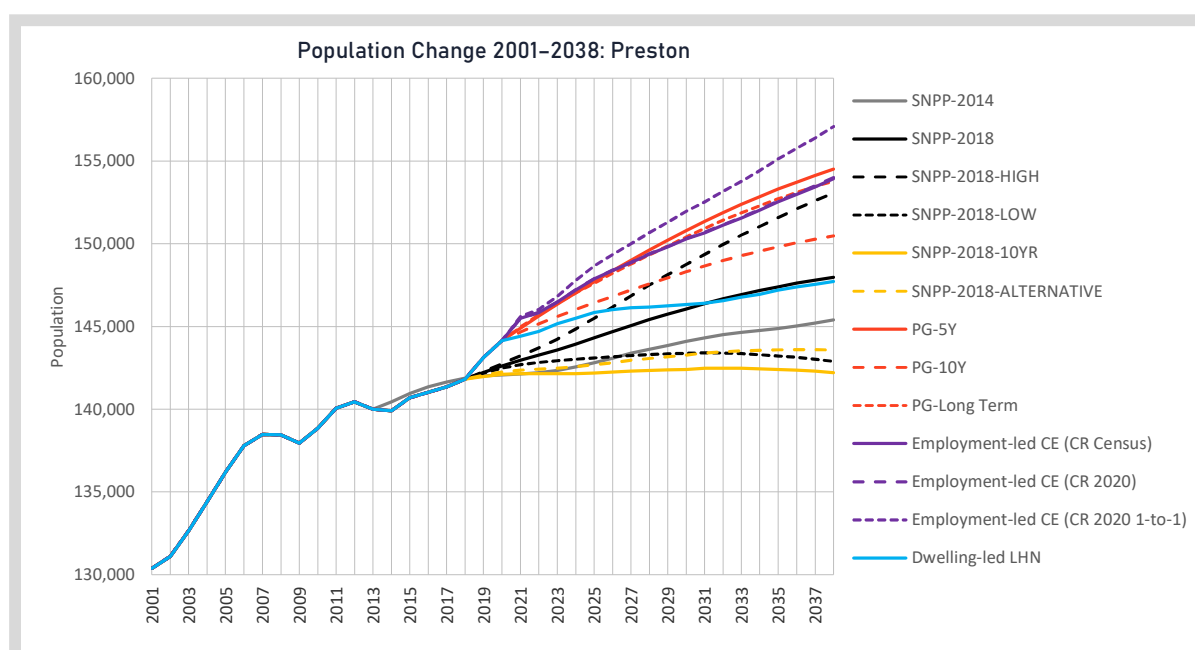


Figure 33: Preston - Growth scenarios, 2001–2038
Source: ONS, Edge Analytics POPGROUP modelling

Table 15: Preston – Scenario outcomes, 2023–2038

Scenario	Change 2023–2038				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Employment
Employment-led CE (CR 2020 1-to-1)	10,263	7.0%	7,013	11.4%	160	490	378
SNPP-2018-HIGH	8,824	6.1%	6,185	10.3%	48	432	491
PG-5Y	8,176	5.6%	6,164	10.0%	38	431	411
Employment-led CE (CR 2020)	7,525	5.1%	5,883	9.6%	2	411	378
Employment-led CE (CR Census)	7,468	5.1%	5,860	9.5%	-1	409	378
PG-Long Term	7,403	5.1%	6,147	10.0%	-14	429	445
PG-10Y	4,879	3.4%	4,707	7.7%	-139	329	286
SNPP-2018	4,390	3.1%	4,295	7.2%	-187	300	262
SNPP-2014	3,052	2.1%	3,550	5.9%	-394	248	84
Dwelling-led LHN	2,561	1.8%	3,793	6.2%	-274	265	148
SNPP-2018-ALTERNATIVE	1,088	0.8%	3,018	5.1%	-333	211	107
SNPP-2018-10YR	71	0.0%	2,745	4.6%	-389	192	65
SNPP-2018-LOW	-44	0.0%	2,404	4.0%	-422	168	34

Source: ONS, Edge Analytics POPGROUP modelling. Note that employment growth outcomes under all trend and SNPP scenarios have been derived using the fixed 2011 Census commuting ratio assumptions.

South Ribble

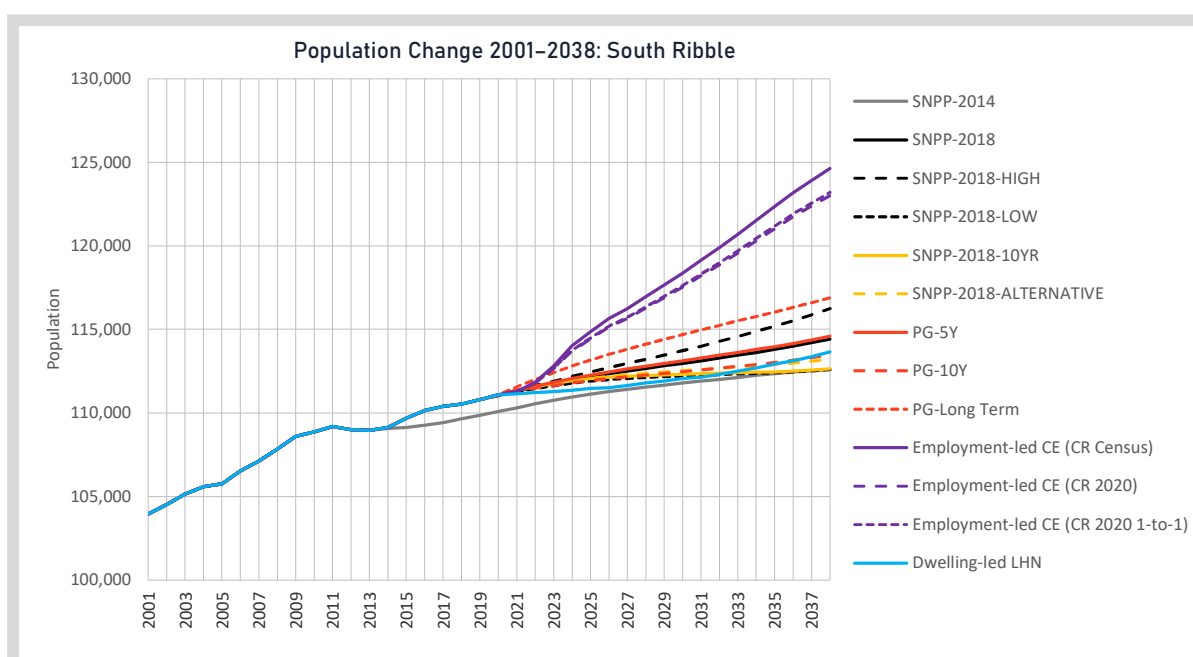


Figure 34: South Ribble - Growth scenarios, 2001-2038
Source: ONS, Edge Analytics POPGROUP modelling

Table 16: South Ribble – Scenario outcomes, 2023-2038

Scenario	Change 2023-2038				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Employment
Employment-led CE (CR Census)	11,817	10.5%	6,558	13.3%	841	452	363
Employment-led CE (CR Census)	10,531	9.3%	6,028	12.2%	763	416	363
Employment-led CE (CR 2020)	10,361	9.2%	5,957	12.1%	753	411	363
PG-Long Term	4,494	4.0%	3,480	7.1%	393	240	134
SNPP-2018-HIGH	4,349	3.9%	3,344	6.8%	378	231	127
PG-5Y	2,751	2.5%	2,813	5.7%	292	194	56
SNPP-2018	2,660	2.4%	2,674	5.5%	286	184	64
Dwelling-led LHN	2,379	2.1%	2,624	5.4%	276	181	48
SNPP-2014	1,849	1.7%	2,124	4.4%	92	146	-25
PG-10Y	1,835	1.6%	2,484	5.1%	256	171	31
SNPP-2018-ALTERNATIVE	1,516	1.4%	2,370	4.8%	237	163	28
SNPP-2018-LOW	967	0.9%	2,002	4.1%	193	138	1
SNPP-2018-10YR	862	0.8%	1,946	4.0%	191	134	10

Source: ONS, Edge Analytics POPGROUP modelling. Note that employment growth outcomes under all trend and SNPP scenarios have been derived using the fixed 2011 Census commuting ratio assumptions.

APPENDIX 3 ABBREVIATIONS

Abbreviations

APS	Annual Population Survey
ASFR	Age-specific fertility rate
ASMigR	Age-specific migration rate
ASMR	Age-specific mortality rate
CE	Cambridge Econometrics
CR	Commuting Ratio
DF	Derived Forecast
dpa	Dwellings per annum
DLUHC	Department for Levelling Up, Housing and Communities
DWP	Department for Works and Pensions
HELM	Higher Education Leavers Methodology
HNA	Housing Needs Assessment
IPS	International Passenger Survey
LEFM	Local Economy Forecasting Model
LHN	Local Housing Need
MHCLG	Ministry for Housing Communities and Local Government
MYE	Mid-year population estimate
NINo	National Insurance Number
NPPF	National Planning Policy Framework
OAD	Old Age Dependency
OBR	Office for Budget Responsibility
ONS	Office for National Statistics
PAF	Postcode Address File
PG	POPGROUP
PPG	Planning Practice Guidance
SNPP	Subnational Population Projection
UPC	Unattributable Population Change



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APPENDIX 10:

Alford Appeal Decision Ref. 3278196



Appeal Decision

Inquiry Held on 7-10, 14 and 15 December 2021

Site visit made on 15 December 2021

by Harold Stephens BA MPhil Dip TP MRTPI FRSA

an Inspector appointed by the Secretary of State

Decision date: 11th January 2022

Appeal Ref: APP/R3650/W/21/3278196

Land west of Loxwood Road, Alford, Surrey, GU6 8HN

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by The Merchant Seamans War Memorial Society and Thakeham Homes Limited against the decision of Waverley Borough Council.
 - The application Ref WA/2020/1684, dated 30 October 2020, was refused by notice dated 5 March 2021.
 - The development proposed is the demolition of Hollyoak and erection of 99 dwellings (including 30% affordable provision) and associated highways and landscape works.
-

Decision

1. The appeal is allowed and planning permission is granted for demolition of Hollyoak and erection of 99 residential dwellings (including 30% affordable housing), associated highway and landscape works, and removal of oak subject to Tree Preservation Order 20/20 at land west of Loxwood Road, Alford, Surrey in accordance with the terms of the application, Ref WA/2020/1684, dated 30 October 2020, and the plans submitted with it, subject to the conditions set out in the Schedule attached to this decision.

Procedural Matters

2. After the permission was refused the Appellants proposed an amendment to the description of the proposed development to include a reference to the removal of an oak tree subject to Tree Preservation Order 20/20. The revised wording is as follows:

"Demolition of Hollyoak and erection of 99 residential dwellings (including 30% affordable housing), associated highway and landscape works, and removal of oak subject to Tree Preservation Order 20/20".

The Council raised no objection to this. Therefore, I shall determine this appeal on the basis of the revised description of the proposed development.

3. In addition to the Landscape Strategy that was submitted with the application,¹ the Appellants submitted some minor amendments to the Landscape Strategy comprising further planting along the western and northern boundaries of the appeal site. This would take the form of a native species hedgerow on the western boundary and a belt of native shrub planting and native trees along the

¹ Landscape Strategy - Ref 657-01- Landscape Collective, October 2020

northern boundary. The main parties agreed that the Revised Landscape Strategy (Drawing No 657/01A)² would not materially change the proposal and no one would be prejudiced because they might have been denied an opportunity to comment. Therefore, I have taken the Revised Landscape Strategy into account in the determination of this case.

4. The following Statements of Common Ground (SoCG) were submitted to the Inquiry:
 - General SoCG;
 - Housing Land Supply SoCG; and
 - Transport and Highways Matters SoCG with Surrey County Council (SCC).
5. The application was supported by a number of plans, reports, and technical information. A full list of the plans on which the appeal is to be determined is set out in Section 10 of the General SoCG³ and a full list of the core documents forming part of the consideration of this appeal is also set out in Section 10 of the General SoCG.⁴
6. I held a Case Management Conference (CMC) online on 7 October 2021. At the CMC the main issues were identified, how the evidence would be dealt with at the Inquiry, conditions, planning obligations, core documents, plans, the timetable for submission of documents and other procedural matters.
7. At the Inquiry a Planning Obligation was submitted.⁵ The Planning Obligation is made by an Agreement between the Appellants, Waverley BC and SCC under s106 of the TCPA 1990. The s106 Agreement secures: 30 affordable housing units on site; the maintenance of play space; the maintenance of Sustainable urban Drainage Systems (SuDS); the maintenance of open space; the provision of a Demand Responsive Bus Service; the provision of highway improvement contributions and the provision and monitoring of a travel plan. The s106 Agreement is signed and dated 22 December 2021 and is a material consideration in this case. A Community Infrastructure Levy (CIL) Compliance Statement⁶ was also submitted in support of the Planning Obligation. I return to the Planning Obligation later in this decision.
8. Following the submission of the Planning Obligation at the Inquiry, and the earlier submission by the Appellants of a noise impact assessment that considered the likely effects of the proposed development on properties either side of Hollyoak, the fourth and fifth reasons for refusal (RfR) contained in the Council's decision notice of 5 March 2021 were not pursued at the Inquiry.
9. The appeal proposal was screened for Environmental Impact Assessment (EIA) by the Council, and it was determined that EIA was not required. I agree with the negative screening that was undertaken by the Council.

² Appendix 2 of Joanna Ede's proof of evidence

³ CD 9.4. The parties are agreed that Plan SK_001 which relates to the existing elevations and floorplans of Hollyoak, which is proposed to be demolished as part of the appeal proposals, is also relevant and should be taken into account in the decision.

⁴ Ibid

⁵ APP13

⁶ LPA7

Main Issues

10. In the light of the above I consider the main issues are:
- (i) *Whether the scale and location of the proposed development is acceptable in principle in the light of the Council's Spatial Strategy;*
 - (ii) *The effect of the proposed development on the character and appearance of the area; and*
 - (ii) *Whether the Council can demonstrate a five year housing land supply and whether paragraph 11 d) of the NPPF is engaged.*

Reasons

Planning Policy Context

11. The appeal site comprises 5.91 hectares of land to the west of Loxwood Road, Alford. The site sits behind the existing line of dwelling houses along Loxwood Road and would be served via the creation of a new access road onto Loxwood Road. The appeal site is outside of but adjoining the settlement boundary. The appeal site predominantly comprises agricultural land (Grade 3b), with the exception of a single property, named Hollyoak, which fronts Loxwood Road, and a portion of highway land along Loxwood Road. The topography of the appeal site is generally flat. An oak tree (T93) to the rear of Hollyoak is subject to a Tree Preservation Order 20/20.
12. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the appeal must be determined in accordance with the development plan unless material considerations indicate otherwise. In this case the development plan for the appeal site comprises the policies of the Waverley Local Plan Part 1 (2018) (LPP1);⁷ and the saved policies of the Waverley Borough Local Plan (2002) (Saved Policies 2007) (the 2002LP).⁸
13. The development plan policies that are relevant to this appeal are agreed by the main parties and are set out in the General SoCG⁹ at paragraph 6.3. There is no need for me to repeat these policies here.
14. The Council is in the process of preparing a new Local Plan, but this is at a very early stage. The Waverley Borough Council Local Plan Part 2: Site Allocations and Development Management Policies (LPP2) was formally submitted for examination by the SoS on 22 December 2021. It therefore has limited weight at the present time.
15. The Alford Parish Council has undertaken to prepare a Neighbourhood Plan (the Alford Neighbourhood Plan) (ANP). A consultation draft has not yet been prepared. It is currently expected that the plan will move to Regulation 14 stage in Spring 2022. It therefore has limited weight at the present time.
16. At the Inquiry there was some debate as to what constituted the most important policies, whether they are out-of-date and the weight that should be attached to each policy. Paragraph 11 d) of the NPPF is precise in its language

⁷ CD4.1

⁸ CD4.4

⁹ CD9.4

Its reference to 'application' rather than 'appeal' means it is those policies relating to the consideration of the whole scheme rather than those matters in dispute at the appeal that should be included. However, "most important" policies do not mean "all relevant" policies and it is a matter of judgement for the decision maker to decide what these may be. Case law has determined that it is the basket of most important policies as a whole that is the relevant consideration.

17. There was no agreement between the main parties as to what constituted the most important policies in this case. I consider that most of the policies referred to in the reasons for refusal fall within this category. I also consider that Policy ST1 (Sustainable Transport) which is not quoted in the reasons for refusal should be considered most important for the determination of this appeal.
18. The most important policies to this application proposal are thus as follows:
 - LPP1: Policies SP2, ALH1, ST1, RE1, RE3, TD1, NE1 and NE2,
 - 2002LP: Policies D1, D4 and D7.
19. Other policies, although not considered the most important, are still of some relevance:
 - LPP1: SP1, ICS1, AHN1, AHN3, CC2, CC4 and LRC1
20. As to whether the basket of most important policies as a whole is out-of-date in the context of paragraph 11 d) of the NPPF and the weight that should be attached to each policy are matters that I shall return to later in this decision.

First Issue - Whether the scale and location of the proposed development is acceptable in principle in the light of the Council's Spatial Strategy

21. LPP1 Policy SP2 sets out the Council's spatial strategy for the area. In order to maintain Waverley's character whilst ensuring that development needs are met in a sustainable manner, it seeks to focus the majority of development within four main settlements, with moderate and limited levels of development directed at second and third tier villages.
22. Alford falls to be considered as an 'other village' within the third tier of the settlement hierarchy. This positively worded policy is permissive of limited levels of development in and around 'other villages'. The appeal site is outside of the settlement boundary, albeit adjacent to it, in an area known as Alford Crossways. The policy goes on to recognise that those villages not within the Surrey Hills AONB or Green Belt offer more scope for growth. The appeal site does not lie within either of these areas but is considered to be countryside beyond the Green Belt.
23. The scope of limited levels of development in villages like Alford, as proposed in Policy SP2, needs to be understood in the context of Alford being a less constrained settlement. It is also in contrast to the 'modest growth' to meet 'local needs' for all villages except for those specified in Policy SP2.
24. LPP1 Policy SP2 does not define 'limited growth'. However, LPP1 Policy ALH1 distributes the amount and location of housing, identifying that at least 11,210 net additional homes are required in the period 2013 to 2032 (equivalent to at least 590 dwellings a year). Furthermore, it indicates that within the plan period

2013 to 2032 the parish of Alford is required to accommodate a minimum number of 125 homes. Whilst the policy does not establish a ceiling on the number of new dwellings to be accommodated, I accept that it does not allow for unlimited development.

25. The fact that the minimum number of 125 new homes in Alford has already been exceeded by completions and commitments (and the related fact that the size of Alford is doubling as a result of recent consents) is therefore not indicative of a policy breach. It adheres to the fact that growth in a less constrained settlement is to be supported and is consistently being supported on appeal. In my view, the number of homes in Alford that would arise from adding this appeal scheme (99 units) to the existing completions and commitments is neither "excessive" nor "disproportionate" in the words of the LPP1 Examining Inspector at paragraph 128 of his report.¹⁰ It is a question of looking at each application on a case by case basis.
26. As I perceive it there is no cap imposed in the Policy ALH1. If the Examining Inspector or the Council had wanted to impose a cap in LPP1 they could have done so in the policy. Reading the policy objectively, it must be therefore assumed that there was a positive decision not to impose a cap. Indeed, it appears from the Sustainability Appraisal (SA)¹¹ undertaken for LPP1 that the 125 homes figure for Alford is not a product of the number of "suitable" sites for development but is instead a fairly arbitrary number to reflect the facilities and services in the village.¹² It was taken as a "given" and it is worrying that reasonable alternatives with a higher minimum figure attributed to Alford were therefore not assessed by the SA. It is noteworthy that the SA does recognise that the village "stands out somewhat from the other smaller villages in that there are relatively few environmental constraints."¹³
27. The LPP1 expects delivery to be achieved in accordance with Policy ALH1 through decisions on planning applications, the detailed application of the Local Plan (LPP1 and LPP2) and Neighbourhood Plans. There is currently no Neighbourhood Plan in place for the area and LPP2 is at an early stage. Neither document has progressed sufficiently to be attributed any more than limited weight. Therefore, as the Inspector found in the Land East of Loxwood Road decision,¹⁴ planning applications are currently the primary route for delivering housing in the area. The position on LPP2 and ANP has not changed significantly since that decision.
28. For all of these reasons, there is nothing in Policy SP2 or ALH1 to preclude this nature and scale of development. There is no actual text in either policy which would be breached by the development. Indeed, there is positive support for the principle of development on this site given the relatively unconstrained nature of Alford. The proposals would comply with Policy SP2 and ALH1 bearing in mind that the spatial strategy's key aim is to meet development needs whilst protecting areas of the highest importance (including Green Belt, AONB and AGLV, the Thames Basin Heaths SPA). This is precisely what this scheme does.

¹⁰ CD4.2

¹¹ APP12

¹² LPA2 SA Extract paragraph 6.3.17

¹³ Ibid

¹⁴ CD6.2 paragraph 12

29. The Council relies on the 2017 Springbok Radcliffe Estate decision,¹⁵ but this was a completely different scale of development in a different planning policy context. It comprised 455 homes, a care home and other facilities, on its own in a single scheme which could not be described as “limited” development “commensurate with” the spatial strategy and settlement hierarchy whereas the appeal scheme clearly can. They are clearly completely distinguishable.
30. The Council in RfR1 also contend that policies ALH1 and SP2 would be breached due to the future occupants of the development having limited access to local services and facilities and unduly relying on the private car. Policies ALH1 and SP2 are silent on these matters. However, I note that Policy ST1, requires development schemes (among other things) to be located where opportunities for sustainable transport modes can be maximised, reflecting the amount of movement generated and the nature and location of the site. Importantly, the policy expressly recognises that “solutions and measures will vary from urban to rural locations”.
31. The same pragmatic approach to what can realistically be provided in a rural location is found in the NPPF. Paragraph 105 expressly notes that “opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”. NPPF paragraph 110(a) requires “appropriate” opportunities to promote sustainable transport modes be taken up, “given the type of development and its location”.
32. I note the Council does not dispute that, given the location of the proposed development, opportunities for sustainable transport modes have been maximised. Instead, it is argued that the location itself is not “sustainable”, with the sustainable transport alternatives not being as attractive as the private car, with the result that the majority of residents would still use the car instead of such alternatives. However, neither Policy ST1 nor any other local or national policy requires a development to be in a “sustainable location”, albeit Policy SP2 does require development needs to be met in a “sustainable manner” which includes “limited” development in Alfold. There is no local or national policy requiring the sustainable transport modes available to future residents to be as attractive as the private car. Instead, what is required is a “genuine choice of transport modes.”¹⁶ There is no local or national policy which requires the majority of residents to use sustainable alternatives to the private car.
33. Instead, local and national policy assesses the sustainability of the transport offer *in the context of the location* and asks whether appropriate opportunities to promote sustainable transport have been taken up. If, given the location, they have been, then the proposal is policy compliant. There is no free-standing requirement (contrary to the Council’s approach) to consider the sustainability of the location in the first place. Instead, that location is taken into account in assessing compliance with sustainable transport policy.
34. Plainly Alfold cannot match the sustainability of locations such as Guildford or Cranleigh. Nevertheless, the existing conditions (in terms of local services and sustainable transport options) demonstrate that Alfold does have a reasonable range of services and facilities, namely a petrol station and associated M & S

¹⁵ CD6.1

¹⁶ NPPF paragraph 105

convenience store, a part-time Post Office, a business centre providing some employment uses, churches, public houses and a veterinary surgery.

35. I accept that the bus services are limited but Alfold has a better than average provision for a rural village. Although Bus 69 is limited, Bus 42, serving Cranleigh, Godalming and Guildford, runs eight times per weekday in both directions, with two buses leaving Alfold Crossways before 0800 hours and the last bus leaving Guildford at 1715 hours. This would enable someone to commute to work in Guildford for a standard 0900 -1700 hour job. The journey would take 50 minutes from Alfold to Guildford, which is a reasonable commuting time. The bus stops are right outside the appeal site, so future residents would be well placed to use this service. At the Inquiry the Appellants also referred to the community transport service known as The Hoppa Shopper, and a bus provided by SCC for secondary school pupils travelling from Alfold Crossways to Glebelands School in Cranleigh.
36. From the evidence submitted I note that there are five railway stations all around 15km from the site. Although the Council is critical of this provision equivalent distances have not stopped the Council from promoting the strategic allocation of Dunsfold Park Garden Village.
37. As for cycling, it is agreed with the Local Highway Authority (SCC), that cycling is a potential sustainable transport mode for some, e.g. with Cranleigh a 24 minute cycle ride away. The appeal site is only a few minutes bike-ride away from the Surrey Cycleway, which runs west to east through Alfold Crossways on Dunsfold Road, A281 Alfold Bypass and Wildwood Lane. Moreover, the topography of the area is relatively flat and therefore conducive to cycling.
38. Overall, the services and facilities available are commensurate with the scale of Alfold and the NPPF recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. In addition, the Appellants have proposed a range of measures to improve the current situation and promote the use of sustainable modes of travel. The package of proposed measures agreed with SCC would ensure that sustainable transport modes are maximised given the location and scale of development.
39. First, there would be a contribution of £400,000 towards a Demand Responsive Bus Service (DRBS) to serve the appeal scheme and the local area. This would secure five years of the service to add on to the five years already to be provided by the scheme approved on Land East of Loxwood Road, making 10 years of provision in total. The Inspector in that decision¹⁷ was satisfied that the five years of DRBS funding would enable provision to be made pending the sustainable transport package, including regular bus services, being provided by the Dunsfold Park development. From the evidence that is before me it is now clear that there will be significant delays to this scheme. However, a doubling of the DRBS period to 10 years would cater for the longer anticipated timescale. The DRBS would improve the frequency/availability of the services available and could be used to access larger settlements or the surrounding railway stations.
40. Although the Council described the DRBS as a “glorified taxi service” I note that DRBS has the strong support of SCC,¹⁸ who have received Central Government

¹⁷ CD6.2 paragraph 23

¹⁸ Stephanie Howard’s proof of evidence paragraph 5.8.7

funding to provide DRBS in Mole Valley and are currently preparing a funding bid for DRBS in Tandridge, Waverley and Guildford.

41. Moreover, the LPP1 states that “the Council will encourage travel choice in the rural areas through initiatives such as demand responsive bus services.”¹⁹ The key point is that the DRBS would encourage a departure from reliance on the private car, and so it is surprising for the Council to be so hostile to it.
42. In addition to the DRBS contribution, the appeal scheme would secure by s.278 Agreement 2 new bus shelters on Loxwood Road, together with footways and an informal pedestrian crossing. There would also be a new pedestrian route connecting the site to public footpath 415a, and commitment to the Residential Travel Plan,²⁰ which SCC agrees would reduce reliance on private vehicles.
43. The scheme would also benefit from improvements secured by the East of Loxwood Road scheme to the footway along Horsham Road (A281), to enhance the safety and attractiveness of the route to the M & S at the petrol station. SCC has committed to delivering a footpath between Dunsfold Aerodrome and Alfold (not conditional on the Dunsfold Park development) which would improve the attractiveness of this route for future residents of the appeal scheme.²¹
44. With the support of these measures, the Appellants put forward targets in Table 4-1 of the Residential Travel Plan,²² which would see a 6% modal shift from single occupancy car drivers over a five-year period. I consider these targets to be realistic in nature because they have been approved by SCC. The Council has not submitted any evidence in that regard, and I am aware that when it comes to agreeing modal shift targets in travel plans, it is the Local Highway Authority (SCC), not the Council, who have the relevant expertise.
45. Further, I note that the Appellants submitted evidence which demonstrates access to suitable services and facilities without undue reliance on the private car in relation to public transport, leisure and community facilities, retail, health, education and employment.²³
46. Finally, in terms of this issue, I appreciate that in relation to the Dunsfold Park development, the sustainability of Alfold as a location is not dependent on Dunsfold Park, albeit it would dramatically improve the level of services and facilities close-by for future residents.
47. Drawing all of these threads together, I consider that the development would maximise the sustainable transport options available in this rural area and that there is a realistic prospect that residents could utilise sustainable modes of travel if they wish to do so. The measures proposed would encourage and facilitate such use and there need not be reliance entirely on private vehicles for travel. Whilst I accept that the appeal site is not the most accessible compared with urban sites and that opportunities for sustainable travel patterns would remain limited after the development, they are nevertheless sufficient for the scale of development proposed in this case. Furthermore, it is clear to me that the increased population arising from the development would support the local services. There would be no conflict with Policies SP2, ALH1 and ST1 of LPP1.

¹⁹ CD4.1 paragraph 7.11

²⁰ CD2.6

²¹ Plan 7 in Plans and Appendices to Stephanie Howard’s proof of evidence

²² CD2.6 page 14

²³ Section 8 of Stephanie Howard’s proof of evidence

48. I conclude on the first main issue that the scale and location of the proposed development is acceptable in principle in the light of the Council's Spatial Strategy.

Second Issue - The effect of the proposed development on the character and appearance of the area

49. At my site visit I saw that the appeal site lies adjacent to the existing settlement edge of Alford Crossways and wholly within the parish of Alford. It comprises an irregular shaped arable field and a single residential property with private garden (known as 'Hollyoak') which is accessed from Loxwood Road. The site has a close relationship to the existing settlement of Alford due to its central position in the village, physical connection and adjacency with the existing village edge along Loxwood Road, similar topography and its visual association and connectivity with the village sports ground.
50. Within the Surrey Landscape Character Assessment, the appeal site forms part of the Dunsfold to Pollingfold Wooded Low Weald LCA which is a generally flat and rural landscape with a mix of arable and pastoral fields, woodland blocks and mature hedgerows and tree belts. It includes the villages of Alford and Alford Crossways but elsewhere, settlement is limited. The appeal site is broadly representative of the general character of the LCA. Human influences are present in the landscape surrounding the site including nearby roads, residential development within Alford Crossways, the sports facilities including floodlighting at the Alford Sports and Recreation Ground and further afield, Dunsfold Aerodrome.
51. There is no dispute between the parties that the appeal site forms part of an area of ordinary landscape value which also lies outside the Green Belt. Some 77% of Waverley Borough is designated as the Surrey Hills Area of Outstanding Natural Beauty (AONB) and/or Area of Great Landscape Value (AGLV) and 61% lies within the Green Belt. However, the appeal site lies outside the Green Belt and does not form part of either the AONB or AGLV nor does it contribute to their special qualities or scenic beauty. The appeal site is therefore of notably lower value and sensitivity than most other parts of Waverley Borough.²⁴ It is common ground that it is not a "valued landscape" in the context of the NPPF.²⁵ The parties agree that the landscape sensitivity of the site is medium whereas the majority of the Borough is of higher landscape sensitivity.
52. At my site visit I saw that the appeal site has a relatively strong sense of enclosure and low level of intervisibility with the wider area, due to the presence of surrounding mature woodland blocks and the existing development edge on the west side of Loxwood Road. The scenic quality of the site is

²⁴ Joanna Ede's proof of evidence paragraph 1.5

²⁵ Paragraph 174(a)

relatively low, given that it is simply a flat open arable field with no significant landscape features.

53. The principal publicly accessible viewpoints from which the appeal site is visible are public footpath 415a to the north of the site and from parts of the Alfold Sports and Recreation to the south. From the public footpath there are open views east and south east towards Alfold Crossways. The appeal site is visible in the middle distance of these views, seen as an open arable field, with the rear of properties on Loxwood Road and their garden boundary fences seen beyond. From parts of the Alfold Sports and Recreation Ground, particularly from the training pitch on the western side there are views towards the appeal site with woodland seen beyond. Pedestrians and road users on Loxwood Road next to the sports ground would have middle distance views through an existing and well vegetated northern boundary to the site.
54. The appeal proposal seeks full planning permission for a proposed residential development of 99 units with associated access and landscaping. I note that the development of the scheme proposals has been landscape-led; the layout and design of the development and the supporting landscape strategy incorporate a number of measures to reflect the character of the local area and mitigate potential landscape and visual effects of the proposals.²⁶ In my view the detailed landscape strategy (Dwg. No. 657/01A) is deliverable and would integrate with the landscape structure of the area.
55. With regard to landscape effects, the proposed development would allow the retention of the key landscape features within and adjoining the site which currently contribute to the local landscape character and visual amenity. These include: a line of mature oak trees along the northern boundary of the site; a ditch along the northern boundary of the site; a small woodland block adjoining the south-western boundary of the site; a tree belt adjacent to the southern site boundary; mature trees and garden boundary vegetation along the eastern boundary of the site. The retention and enhancement of these existing landscape features would be a beneficial effect. Furthermore, the introduction of new tree and shrub planting across the development area within proposed open spaces, along the internal roads and in private gardens would also be beneficial to the character of the site.
56. I accept that the proposed development would result in the loss of a section of open and undeveloped countryside. Plainly the introduction of new dwellings would reduce the sense of openness in the immediate locality. However, the intrinsic character and beauty of the wider countryside would not be unduly harmed by the scheme. There would be an adverse effect on the site itself of medium magnitude, reducing to medium-low over time as the proposed landscape framework matures. The introduction of the enhanced landscaping

²⁶ See CD2.2 Design and Access Statement

and ecological improvements would safeguard the rural character of the area for the long term. The site is of relatively low landscape and visual sensitivity and the proposed development would result in limited and localised harm to the intrinsic character and beauty of the countryside. Consequently, conflict with Policy RE1 carries little weight in the planning balance.

57. The Council argues that the proposal would comprise a major encroachment into the countryside. I disagree. The impact of the proposals on the character of the wider Dunsfold to Pollingfold Wooded Low Weald LCA would be of very low magnitude and the type of effect would be neutral, with no overall improvement or deterioration in the character of the surrounding landscape. The development would form an extension to the existing village of an appropriate scale and character and would integrate with the existing and emerging character of Alfold Crossways. The identified key characteristics of the local landscape character would also be preserved, and the proposed landscape framework would introduce some beneficial changes to landscape character.
58. Policy RE3 of LPP1 requires new development to respect and where appropriate enhance the distinctive character of the landscape in which it is located and has specific requirements for protection to the Surrey Hills AONB and the AGLV. In my view the appeal proposals have been carefully developed to respect and respond appropriately to the local landscape character surrounding the site and would not affect the landscape character of either the AONB or the AGLV. I note that the DAS²⁷ provides further details on how the scheme has responded to local context. The appeal proposals would comply with Policy RE3 of LPP1.
59. With regard to Policy TD1 of LPP1 this policy seeks to ensure that the character and amenity of the Borough are protected by five criteria set out in the policy. The Council does not object to the appeal proposals on design grounds and in my view the proposals promote good design which would lead to a high quality development. Policy D4 of the 2002LP relates to design and layout which are not disputed matters. The appeal proposals would comply with Policy TD1 of the LPP1 and with Policy D4 of the 2002LP.
60. In terms of visual effects, due to the existing enclosure of the site by vegetation and existing built development together with the additional enclosure which would be provided by proposed planting, few views or visual receptors would be significantly changed by the proposed development. Notably, there would be no significant changes to the views and general visual amenity experienced by people travelling through the village. The key views and visual receptors that would be significantly changed by the proposed development are those from: private residential properties on west side of Loxwood Road; PRoW Alfold 415a; and Alfold Sports and Recreation Ground.

²⁷ CD2.2

61. I consider that overall the visual impact would be medium/low given that: (i) the site and the footpath are separated by two open fields which places users 400- 500 metres away, and so users of the footpath would still get the sensation of walking through open countryside even with the development in situ; (ii) the proposed boundary planting for the scheme, including hedgerow and large maturing trees, together with public open space, would mean that the dwellings are visible but filtered by the vegetation; (iii) the boundary planting is outside of individual gardens, and on public areas that would be maintained by a management company, so there would be no risk of it being subject to pressures by future residents; (iv) visibility of the settlement edge of Alfold is already a characteristic of the view as the properties on Loxwood Road and Dunsfold Road are already visible from the footpath; and (v) the proposed development would also be seen in conjunction with the recreation ground which includes floodlights and built form.
62. As to views from the Alfold Sports and Recreation Ground, I saw that the proposed development edge would be set well away from the edge of the ground, with an open arable field retained between them. The views would still have the outlook of open fields and woodland blocks to the north and north-west. Indeed, there would be large parts of the recreation ground where the appeal site would not be visible. I accept that the views from the neighbouring properties on Loxwood Road would inevitably change, but in my view the separation distances are very good, with 55-80m between properties, and vegetation in the intervening area.
63. With regard to Policy D1 of the 2002LP the appeal proposals would not result in loss or damage to an area of landscape value and therefore would comply with part (a). Similarly, with regard to part (b) which requires development proposals not to harm the visual character and distinctiveness of a locality, I consider the visibility of the proposals from the surrounding area would be very limited and, from the few areas where it would be visible, the proposals would not appear incongruent or out of scale with the existing edge of Alfold which is seen in these views. There would be no conflict with Policy D1 of the 2002LP.
64. With regard to the previous appeal decision for the Springbok Radcliffe Estate,²⁸ it is clear to me that the former refused scheme was a materially very different proposal to what is proposed under the current appeal scheme. Plainly the current appeal scheme has responded to and taken on board the Inspector's concerns. I note the following differences between the two schemes: (i) the footprint of development was 6 times bigger; (ii) the 2017 scheme was much closer to the nearby AGLV and some of it actually fell within the AGLV; and (iii) the scale and diversity of the proposed development was much greater.

²⁸ CD6.1

65. There were some relevant conclusions on landscape impact in the Springbok Radcliffe Estate decision: not a valued landscape;²⁹ containment by surrounding woodland would “lessen the impact of the new built form;”³⁰ Alfold Crossways is “not purely linear in form”, and the Inspector did “not consider that consistency with a linear form is an important parameter against which proposals should be assessed.”³¹ Although he concluded a major adverse change to views from footpath 415a,³² this was due to the residential development extending right up to the footpath itself, rather than being separated by two fields as here.
66. The Council contends that the loss of the protected oak tree, T93 in the Appellants’ Arboricultural Impact Assessment, would harm the amenity of the village. It is argued that the tree is a healthy specimen with potentially many decades of life left. When compared with other A-grade trees of a similar size and condition in the Appellants revised tree schedule (e.g.T5, T6, T85 and T87) it is claimed that its quality is not materially less, and it is right that it should be of the same grade.
67. In respect of trees, saved Policy D7 of the 2002LP³³ restricts development that would result in the loss of a protected tree. I accept there would be limited conflict with this policy. However, the more recent Policy NE2 of LPP1³⁴ provides that the Council will seek “where appropriate” to maintain and enhance existing trees. I note that the Inspector in the East of Loxwood Road decision³⁵ found no conflict with the latter policy in that case, noting that the limited harm arising from the loss of a single TPO tree would be “very limited and largely compensated by the replacement tree planting proposed”.
68. In the present case the appeal scheme requires the removal of three trees, one of which is the subject of a TPO made after the planning application was submitted. The tree removal is necessitated in order to create the access to the site for the development. I note that there is no alternative suitable access proposed which would avoid a need for tree loss. I note also from my site visit that there is quite limited visibility of T93 from public places given the various obstacles in the way. I saw that it is only visible above and between the roofs of houses on Loxwood Road. I accept that the tree could be depicted with difficulty as an individual tree from the road, particularly when in a car, that the views are fleeting, and that it has very limited amenity value. In my view the loss would not impact on the reasonable enjoyment of the public.
69. From the evidence that is before me and from my site visit, I consider that T93 should be categorised B. Its downgrading from category A must reflect the

²⁹ CD6.1 paragraph 39

³⁰ CD6.1 paragraph 45

³¹ CD6.1 paragraph 48

³² CD6.1 paragraph 54

³³ CD4.4 page 20

³⁴ CD4.1 page 146

³⁵ CD6.2 paragraph 32

unsympathetic past management³⁶ by the utility company who need to carry out pruning to protect the electricity cables running next to the tree canopy every 5-7 years. The Council focuses on the life expectancy of the tree and ignores this significant constraint on the tree.

70. Importantly, the appeal scheme would retain 75 of the 78 trees currently on the site, which equates to 96.4% of the existing trees.³⁷ The scheme would also plant an additional 198 trees.³⁸ These include 13 large canopy native species, including one being planted very close to where T93 would be lost. The Council confirmed that it had no objection in principle to the revised landscape strategy. In my view what is proposed in the revised landscape strategy would go well beyond what would normally be expected by way of mitigation. I agree that the proposed commitment to replace any failed trees within the first five years would be reasonable and standard.
71. Plainly the appeal scheme would comply with Policy NE2. It would not be appropriate for T93 to be retained given the necessity of removal to make way for the access, the considerable retention of trees, and the proposed planting. Policy NE2 is directed at looking at the appropriateness of retaining a tree overall, bearing in mind the whole tree retention and planting proposal and the need for removal by a proposal. Clearly mitigation is a relevant factor in the consideration of whether it is appropriate to remove a tree under Policy NE2.
72. Policies NE1 and NE2 of LPP1 relate to biodiversity and green infrastructure. The landscape proposals for the development would clearly comply with both of these policies. They deliver a strong landscape framework which would make a positive contribution to the local green infrastructure by improving the watercourse along the northern boundary with the introduction of new planting and creating new habitats and increasing the tree cover within the site. A separate report has been provided by Ecology Solutions³⁹ which demonstrates that the proposals would deliver a significant biodiversity net gain (19.5%).
73. On the second issue I consider that the proposed development would have some localised and limited landscape and visual effects. It would result in limited harm to the intrinsic character and beauty of the countryside and there would be a limited degree of conflict with Policy RE1 of the LPP1 and Policy D7 of the 2002LP. However, the proposal would be in compliance with Policies RE3, TD1, NE1 and NE2 of the LPP1 and Policies D1 and D4 of the 2002LP. The adverse effects would be localised and limited and due to the ordinary nature of the landscape and the strong visual containment of the site. I conclude on the second issue that the proposed development would not cause unacceptable harm to the character and appearance of the area.

³⁶ See the Cascade Chart at Appendix 3 to the AIA at Appendix 1 to Peter Wharton's proof of evidence

³⁷ Peter Wharton's proof of evidence paragraph 5.4.3 and 5.51

³⁸ Peter Wharton's proof of evidence paragraph 5.7.2 and Joanna Ede's Appendix 2

³⁹ Appendix 3 to Joanna Ede's proof of evidence

Third Issue - Whether the Council can demonstrate a five year housing land supply and whether paragraph 11 d) of the NPPF is engaged

74. Paragraph 74 of the NPPF sets the requirement for Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old.
75. The parties are agreed that the LPP1 was adopted in February 2018. Policy ALH1 of the LPP1 confirms a housing requirement equivalent to 590 dwellings per annum. This results in a base requirement of 2,950 homes. It is also agreed that the correct base for the calculation of five year housing land supply, for the purposes of this appeal is 1 April 2021. The five year period is, therefore, 1 April 2021 to 31 March 2026. The appropriate buffer in the calculation of the five year supply is agreed to be 5%.⁴⁰
76. The most up-to-date position on five year housing land supply records agreement that the plan period completions for the purposes of calculating housing land supply are 3,422 homes, against a requirement of 4,720. That results in a shortfall in delivery to April 2021 of 1,298 homes. I accept that the contribution from Use Class C2 completions during the plan period can be included in the five year supply calculation in accordance with PPG advice.⁴¹ The contribution from communal accommodation development is calculated by dividing the additional bedspaces by 1.8. The parties are agreed that the five year requirement is 4,248 homes, including the steps taken in the SoCG-Housing Land Supply.⁴²
77. The parties disagree about the supply of deliverable sites. The final respective position of the Appellants and the Council on disputed sites is set out in a Final 5YHLS Position Statement⁴³ and the revised HLS Scott Schedule.⁴⁴ I have also taken into account the Supplemental 5YHLS Position Statement⁴⁵ prepared by the Appellants and the Update Note⁴⁶ prepared by the Council.
78. The definition of 'deliverable' is set out within Annexe 2 of the NPPF, which states:

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

(a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

⁴⁰ CD9.11 Statement of Common Ground Housing Land Supply

⁴¹ See Paragraph: 035 Reference ID: 68-035-20190722 & Paragraph: 016a Reference ID: 63-016a-20190626

⁴² APP9 paragraph 2

⁴³ APP9

⁴⁴ APP10

⁴⁵ APP11

⁴⁶ LPA5

(b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.

79. PPG advice was published on 22 July 2019 on ‘Housing supply and delivery’ and this includes a section that provides guidance on ‘What constitutes a ‘deliverable’ housing site in the context of plan-making and decision-taking.’ The PPG is clear on what is required:

“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions.”⁴⁷

80. I do not consider that the above categories (a) and (b) are a ‘closed list’ i.e. only sites that fall within the two categories could be considered to be deliverable. I have therefore considered the Council’s supply in light of whether the sites are available now, offer a suitable location for development now, and are achievable with a realistic prospect that housing will be delivered on the site within five years. It is relevant that for category (b) a site can only be considered deliverable where it is clear that it *will* deliver. Consideration of what constitutes ‘clear evidence’ is set out in further detail in the PPG.⁴⁸
81. Paragraph 3 of the Final 5YHLS Position Statement helpfully sets out the main sites where the parties differ. With regard to Land at Dunsfold Park the Council confirms that the Dunsfold SPD is due to be adopted in February 2022 and that initial phases could come forward alongside the temporary uses on the site. I accept that the new landowner could implement the existing consent, but I consider it is more likely that an amended outline application would be required. Moreover, there is no evidence of housebuilder involvement, submission of reserved matters or any evidence of progress in this direction. The Council has not provided a realistic assessment of the factors involved in delivery of this site, such as the timetable and likely progress towards completions. Dunsfold Park should not be considered deliverable due to the lack of clear evidence.
82. With regard to Land at Centrum Business Park, Farnham I note from the Council’s additional information that the Council Estates Team is not involved in the redevelopment of the site, so there is no clear information as to: (i) whether there are multiple landowners; (ii) whether the landowners are coordinated; and (iii) what the lease/ownership arrangements are for the current occupiers. In my view, the site is not currently available for development given the existing active occupiers. There is no planning application on the site. There is no clear evidence to suggest that there is a realistic prospect that homes would be delivered on this site within five years.
83. With regard to Land at Ockford Water, it is clear from the Council’s additional information that the site does not currently benefit from planning permission and there is uncertainty as to the acceptability of the current application on the site. There are fundamental development management issues to be resolved. On this basis there is no clear evidence that housing completions would be achieved on this site within the five year period.

⁴⁷ PPG Paragraph: 007 Reference ID: 68-007-20190722

⁴⁸ Ibid

84. With regard to Land at Barons of Hindhead I note that the site is a draft allocation in the draft LPP2 and is subject to a full application for 38 dwellings. However, the site directly adjoins the Devils Punch Bowl which is a National Trust run site in the AONB. There are concerns about overdevelopment of the site, including the proposed design, layout and massing. There are also questions about viability and affordable housing provision. There is no clear evidence to suggest that this site would deliver homes in the next five years.
85. With regard to Land to the rear of 101 High Street, Cranleigh I accept from the Council's additional information that there is some progress on this site. However, the Council has not undertaken an assessment of this site against the factors set out in the NPPG/NPPF guidance to demonstrate there is a realistic prospect of delivery in the five year period. There is no clear evidence as to its deliverability, which is still subject to the submission and positive determination of a planning application.
86. With regard to Land at Wey Hill, Haslemere I note from the Council's additional information that some of the former uses on the site (the Guides and the St John's Ambulance) have already been relocated to new premises within Haslemere. I accept that the site is allocated in the draft LPP2 for residential development. However, the Council's additional information provides no reassurance that the other existing uses on the site can be moved stating only that: "Negotiations with the other existing uses on the site will be taking place to facilitate the redevelopment of the site." The Council has not undertaken an assessment of this site against the factors set out in the NPPG/NPPF guidance. There is no clear evidence to suggest the site is available, offers a suitable location for development, or is achievable. The site should not be considered deliverable due to lack of clear evidence.
87. It is not necessary for me to go through all of the disputed sites in paragraph 3 of the Final 5YHLS Position Statement (APP9) and the revised HLS Scott Schedule (APP10). I am satisfied that all of the disputed sites set out at paragraph 3 of APP9 should not be considered deliverable in the next five years for the reasons given in the Appellants' analysis and commentary in APP10 which is preferred. There is no clear evidence before me that would suggest that any of the disputed sites would deliver the completions suggested by the Council in the next five years.
88. With regard to the dispute between the Appellants and the Council on small sites provision, I consider the key question is whether, as at the base date of 1 April 2021, the small sites were properly included in the Council's list of sites. If the up to date evidence shows that they were, the fact that at a later date a small site permission expired is no reason not to count it as part of the supply (just as one ignores the appearance of new sites that were not part of the supply at the base date). Given the need to choose a base date at some point in the past to make the exercise workable some anomalies are bound to arise but provided there was an extant permission at the base date I consider that a small site is properly included in the supply unless there is clear evidence that as at the base date the site would not be developed. Accordingly, I accept the Council's estimate on small sites provision.
89. It follows that Table 3 of the Final 5YHLS Position Statement is the most realistic taking into account the test of deliverability set out in Appendix 2 to the NPPF and the PPG advice published on 22 July 2019. The supply position

identified in Table 3 is consistent with national policy, case law, appeal decisions and informed by assessment of the technical complexities of delivering development sites including lead-in times. The sites that the Council includes within the supply cannot be justified applying the current definition of deliverable. The Council's supply figure of 4,660 dwellings in Table 3 should be reduced to give a more robust total supply figure of 3,575 dwellings for the five year period. Although the Council maintains there is a 5.22 year supply, in my view, there is a housing land supply equivalent to **4.01** years.

90. The implications of not having a five-year housing land supply are significant. Not only is there a shortfall of some 885 dwellings, but it also means the policies which are the most important for determining the application are automatically out-of-date and the tilted balance applies. I conclude on the third issue that the Council cannot demonstrate a five year housing land supply and that paragraph 11 d) of the NPPF is engaged.

Planning Obligations

91. The NPPF indicates that planning obligations must only be sought where they meet all of the following tests: (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.⁴⁹
92. The s106 Agreement secures provision for 30 affordable housing units on site which is necessary to secure compliance with Policy AHN1 of the LPP1. It also secures the maintenance of play space, SuDS and open space which are necessary in order to make the development acceptable in planning terms and which are directly related to the development. In addition, the s106 Agreement secures financial contributions to fund the DRBS; traffic calming measures and travel plan monitoring which are necessary to address the impacts of the development, to secure compliance with Policy ST1 of LPP1 and the NPPF.
93. In my view, all of the obligations in the s106 Agreement are 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. Therefore, they all meet the tests within Regulation 122 of the CIL Regulations. As such I have taken them into account in the decision.

Other Matters

94. I have taken into account all other matters raised including the concerns raised on behalf of Alford Parish Council and the representations made by interested persons including those who gave evidence at the Inquiry and those who provided written submissions. Many of the matters raised such as the scale of the proposed development, the loss of rural character and open countryside, over reliance on the private car and loss of trees are points which I have already dealt with under the main issues.
95. Concerns were raised that the development would present a flood risk. However, the proposal was accompanied by a Flood Risk Assessment (FRA)⁵⁰ and details of SuDS which include an attenuation basin in the north western part of the site. The site falls within flood zone 1 and thus has the lowest probability of flooding and accords with the sequential approach to new

⁴⁹ NPPF paragraph 57 and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010

⁵⁰ CD1.5

development sought by the NPPF. The Local Lead Flood Authority has assessed the proposal and found it to be acceptable subject to planning conditions. Given their assessment and the conclusions of the FRA, I consider that the development is unlikely to result in additional flood risk for adjacent land or unsafe conditions for future occupiers.

96. Concerns were also raised about foul drainage in Alfold. Thames Water has recommended suitably worded conditions to secure the provision of pre-commencement details of additional water supply and foul water infrastructure or an infrastructure delivery plan. In my view these planning conditions address these concerns in a satisfactory manner.
97. A number of objectors raised concerns about highway safety and traffic. However, I note that a package of mitigation to ensure that the appeal scheme is acceptable in relation to highway and transport matters has been agreed between the Appellants and the Highway Authority (SCC). This is set out in the Transport Assessment⁵¹ and in the Transport and Highways Matters SoCG.⁵² Following the implementation of the mitigation measures to improve access to sustainable transport and to local services and facilities, and the payment of the financial contributions agreed with SCC and set out in the SoCG,⁵³ the residual cumulative impacts of the appeal scheme on the local road network would be negligible and could not be considered to be severe in the context of paragraph 111 of the NPPF.
98. Some of the objections relate to the impact on local ecology. It is agreed in the General SoCG⁵⁴ that the appeal proposals would deliver a biodiversity net gain. A biodiversity net gain assessment was previously carried out by EAD Ecology and is detailed within the Ecological Impact Assessment for the site.⁵⁵ Following the revised landscape strategy a revised calculation was undertaken which shows the proposals would deliver a significant biodiversity net gain of 19.5%. It was also agreed that, based on the submitted ecological report, were planning permission to be granted, suitably worded planning conditions could mitigate and compensate for any harm upon protected species and that the proposal is acceptable in this regard.⁵⁶
99. At the Inquiry reference was made to numerous appeal decisions. I have taken these into account as appropriate in coming to my decision in this case.

Planning Balance

100. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. I have identified the most important policies for determining this application. Of these I found that the proposed development would give rise to a limited degree of conflict with Policy RE1 of the LPP1 and Policy D7 of the 2002LP. However, I conclude that the proposed development would be in accordance with the development plan when taken as a whole, in particular Policies SP2, ALH1, ST1, RE3, TD1, NE1 and NE2 of the LPP1 and policies D1 and D4 of the 2002LP. There are no material considerations which, applying

⁵¹ CD1.11 Section 7

⁵² CD9.5 Section 8.1

⁵³ Ibid

⁵⁴ CD9.4 paragraph 7.9

⁵⁵ CD1.3 October 2020

⁵⁶ CD9.4 paragraph 7.9

section 38(6) of the 2004 Act, would justify a departure from granting planning permission in accordance with the development plan.

101. In any event I have found that the Council cannot demonstrate a five year housing land supply and that paragraph 11 d) of the NPPF is engaged. In my view there is a housing land supply equivalent to **4.01** years. The implications of not having a five-year housing land supply are significant. Not only is there a shortfall of some 885 dwellings, but it also means the policies which are the most important for determining the application are automatically out-of-date and the tilted balance applies. Given that there are no policies in the NPPF which, if applied, would provide a “clear reason for refusing the development” under paragraph 11 d), it follows from the “out-of-date” nature of the most important policies that the tilted balance applies.⁵⁷
102. I consider that the basket of the most important policies are also “out-of- date” because the development plan is incomplete with the absence of the LPP2 and the ANP, which were clearly required by the LPP1 Inspector to be progressed quickly following adoption of the LPP1. The development plan is consequently silent on non-strategic allocations⁵⁸ that are required to meet the full housing requirement, and a complete delivery strategy for the Borough is absent.
103. I have concluded that the most important policies are consistent with the NPPF and that due weight should be given to them in accordance with the advice in paragraph 219 of the NPPF. However, the weight attributed to these policies must be reduced (limited weight in my view) given the failure to bring forward the delivery of sufficient homes within the Borough in order to meet the total requirement of at least 590 dwellings per year, or to meet the needs of their residents for both market and affordable housing. Since the adoption of the LPP1 in February 2018 the lack of progress in bringing forward the LPP2 and/or the ANP has been disappointing and has only served to compound this failure.
104. The harms do not come close to “significantly and demonstrably” outweighing the benefits in this case. The alleged harms in this case are very limited. It is common ground that there would be: no harm to residential amenity as previously alleged in RfR4;⁵⁹ no heritage impacts;⁶⁰ no ecological impacts;⁶¹ no drainage issues or flood risk;⁶² no air quality impacts which would warrant refusal of planning permission;⁶³ no severe impact on highways in terms of capacity/congestion, and no unacceptable impact on highway safety;⁶⁴ there would be no Green Belt harm, and there would be no harm to the Surrey Hills AONB, or to an AGLV.
105. As to the harms alleged by the Council, I consider that the landscape and visual impacts are significantly overstated and limited to localised harm typical of any development of greenfield land on the edge of a settlement. I attach limited weight to this localised harm. There would be limited conflict with Policy RE1 which must be considered in the context of the very rare absence of significant landscape constraints on this site, in comparison with most of the rest of the Borough. The Council also accepted that the impacts have reduced as a result

⁵⁷ CD9.4 paragraph 7.22

⁵⁸ Sites of less than 100 dwellings in size

⁵⁹ CD9.4 paragraph 7.4

⁶⁰ CD9.4 paragraph 7.6

⁶¹ CD9.4 paragraph 7.9

⁶² CD9.4 paragraph 7.10

⁶³ CD9.4 paragraph 7.12

⁶⁴ CD9.4 paragraph 7.18 and CD9.5 paragraphs 4.1.3 and 8.2.1

of the revised landscape strategy. There would be limited conflict with Policy D7 as the tree impacts are limited and outweighed by the benefits in terms of tree planting by the scheme overall.

106. There would be no harm arising from any conflict with the spatial strategy because there is no such conflict. Indeed, the spatial strategy policies (SP2, ALH1 and RE1) can only be given limited weight as they are "out-of-date," such that they no longer reflect and adequately cater for the development needs of the Borough. The restriction on development in the countryside in Policy RE1 needs to be read in conjunction with the facts that (a) policies SP2 and ALH1 expressly recognise the need for development in "and around" settlements, and (b) the settlement boundaries are based on the 1994 Surrey Structure Plan.
107. The extent of the shortfall in 5 YHLS does not affect the operation of footnote 8 and its triggering of paragraph 11 d). However, the degree of shortfall will inform the weight to be given to the delivery of new housing in general alongside other factors such as how long the shortfall is likely to persist, the steps being taken to address it and the contribution that would be made by the development in question. The larger the shortfall is, then logically the less weight should be given to any conflict with the spatial strategy policies (SP2, ALH1 and RE1).⁶⁵ The shortfall of 885 dwellings which I have identified is significant and substantial.
108. From the evidence that is before me, not enough is being done by the Council to address the shortfall, given the over-reliance on the ANP, the considerable delays in LPP2, the inadequacies in the draft LPP2 as only providing an (inaccurate) "factual update" in Alfold rather than positively assessing the suitability of Alfold as a location for growth, and the lack of a 5YHLS.
109. There would be no harm arising from undue reliance on the private car because opportunities for sustainable transport modes have been maximised by the appeal scheme, given the rural location. There are adequate services and facilities which can be accessed without needing a car.
110. There would be a number of benefits of the appeal scheme which were put forward by the Appellants. These benefits were not undermined to any degree during the Inquiry. I deal with each of these below explaining the weight that I attribute to each shown in the brackets.
111. The following benefits would arise: (i) the provision of 69 market homes, in the context of the significant 5YHLS shortfall, should be given substantial weight. This is a significant benefit of the scheme; (ii) the policy-compliant provision of 30 affordable homes, given the Council's acknowledgment of the "pressing need" ⁶⁶ (substantial weight); (iii) the proposed development would support the local services through increased custom at local shops and pubs (moderate weight); (iv) the scheme would also provide relocated and enhanced bus stop infrastructure, and a financial contribution to enable SCC to provide a DRBS to Alfold and the surrounding area (substantial weight); (v) a new permissive footpath connecting the site to footpath 415a would be secured by condition (moderate weight); (vi) improved tree cover from the planting of 198 new trees would be a significant benefit of the scheme, as is the introduction of planting and species rich meadows and grassland to result in a significant 19.5%

⁶⁵ CD7.2 paragraph 47 Hallam Land Management Ltd v SSCLG [2018] EWCA Civ 1808

⁶⁶ LPP1 paragraph 2.42

biodiversity net gain from the development (substantial weight);⁶⁷ (vii) although no enabling case is made, the Appellants contend that a relevant additional benefit of the scheme is that allowing the appeal would provide the Care Ashore charity, who own the land, with funds to secure improvements to the vital support they provide to former navy servicemen (moderate weight) which reflects the weighting given to this by the Inspector in the Springbok Radcliffe Estate appeal decision; and (viii) there would be economic benefits arising from the construction of 99 new homes (moderate weight).

112. Overall, I consider that the weight to be attached to the benefits should be substantial. The Council accepted that significant weight should be given to the benefits overall, cumulatively. The Appellants also indicated that they would “get on the site as soon as possible and contribute to addressing the shortfall”. Importantly, I note that Thakeham Homes are a local developer, with a proven track record, who would actually deliver the site. Given the comparison against the uncertainties over ownership and development of Dunsfold Park, this is a further substantial benefit for this appeal scheme.
113. There is an acute and unmet need for market and affordable housing in this Borough and that need must be met now. Much of the land is constrained by AONB, AGLV or Green Belt designation. The appeal site is a rare resource in Waverley BC area: a non-designated piece of land adjacent to a sustainable settlement which can be developed for housing. In summary, whether on the basis of compliance with the development plan or applying the tilted balance or indeed on a straight balance, the case for the appeal scheme is compelling. There is no reason to withhold planning permission in this case and I conclude that the appeal should be allowed.

Planning Conditions

114. The Council submitted a list of conditions which I have considered in the light of the advice in paragraphs 55 and 56 of the NPPF and the Government’s PPG on the Use of Planning Conditions. The Appellants have agreed to all of the suggested conditions except for a condition which seeks to restrict national permitted development rights. The Appellants have also given consent in writing to all of the suggested pre-commencement conditions as required by Section 100ZA(5) of the Town and Country Planning Act 1990.
115. Condition 1 relates to required time limits and Conditions 2 and 23 are necessary to protect retained trees. Condition 3 is necessary to ensure that the final drainage design does not increase flood risk. Condition 4 is necessary to prevent harm to protected species and to make sure that there is suitable provision for biodiversity. Condition 5 is necessary to ensure safe access is provided and maintained for pedestrians. Condition 6 is necessary in the interests of highway safety, to ensure that the development is not unneighbourly and is not harmful to biodiversity. Condition 7 is required to ensure that the development does not cause harm to badgers which may be present on the site.
116. Condition 8 is required to safeguard heritage assets of archaeological interest. Condition 9 on sample materials and Condition 10 on landscaping are required in the interests of visual amenity. Conditions 11, 12 ,13 and 14 are required in

⁶⁷ This is nearly double the new legal requirement in Schedule 7A to the Town and Country Planning Act 1990 for a 10% gain (inserted by Schedule 14 to the Environment Act 2021).

the interests of highway safety, to ensure that electric vehicle charging is provided and to ensure that the development facilitates access to sustainable transport modes. Condition 15 is necessary to ensure appropriate provision is made for waste and recycling. Condition 16 is necessary having regard to local water pressure concerns to ensure that appropriate infrastructure is provided for the development.

117. Condition 17 is necessary to ensure adequate access to play opportunities. Condition 18 is necessary to ensure high standards of sustainable design and construction. Condition 19 is required to ensure the proper provision of the drainage system. Condition 20 is required to ensure that the development encourages the use of sustainable transport modes. Condition 21 is required to ensure sustainable construction and design. Condition 22 is required to protect the occupants of nearby residential properties from noise disturbance. Condition 24 is required to ensure that there is no harm to protected species. Condition 25 is necessary for the avoidance of doubt.
118. The Council suggests an additional condition should be imposed which would remove permitted development rights from the dwellings subject to the appeal. However, the NPPF and the PPG are both clear that such conditions should only be imposed in exceptional circumstances.⁶⁸ No detailed justification has been provided in this case and I can see no reason why such a condition should be necessary in this instance.

Overall conclusion

119. Having considered these and all other matters raised I find nothing of sufficient materiality to lead me to a different conclusion. The appeal is therefore allowed subject to the conditions set out in the attached Schedule.

Harold Stephens

INSPECTOR

⁶⁸ NPPF paragraph 54 and PPG Use of Planning Conditions Paragraph: 017 Reference ID: 21a-017-20190723

SCHEDULE OF PLANNING CONDITIONS (1-25)

Time limit condition

- 1) The development hereby permitted shall be begun within three years of the date of this permission.

Pre-commencement conditions requiring details to be submitted

- 2) Prior to the commencement of the development (including the movement of plant, machinery and bring materials on to site), an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented fully in accordance with the approved details which shall include in full compliance with the recommendation in BS5837:2012 for the protection of all retained trees (above and below ground):
 - A schedule of site supervision for safe retention of all retained trees and any associated works,
 - Tree protective fencing measures and protection plan
 - Details of all work within the RPAs of retained on-site trees, particularly in relation to hard surfacing and below ground services/utilities.
- 3) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
 - (a) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy. Associated discharge rates shall comply with the approved FRA and storage volumes shall be provided using a maximum discharge rate of 6.1 l/s/ha applied to the positively drained areas of the site only.
 - (b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers). Details should be provided for the proposed swales/SuDS planters, permeable paving and attenuation basin.

- (c) A plan showing exceedance flows (i.e., during rainfall greater than design events or during blockage) and how property on and off site will be protected. The plan should include how exceedance flows from the adjacent ordinary watercourse will be managed.
 - (d) Details of drainage management responsibilities and maintenance regimes for the drainage system. This should include riparian responsibilities for the adjacent ordinary watercourse.
 - (e) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.
- 4) Prior to the commencement of the development a detailed Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority.

The LEMP should be based on the proposed impact avoidance, mitigation and enhancement measures specified in Section 4 Avoidance, mitigation, compensation and enhancement of the Ecology Report and should include adequate details of the following:

- Mitigation measures for the loss of Lapwing breeding habitat
- Habitat management and enhancement for Reptiles (as set out in the Reptiles section above) - Aims and objectives of management
- Appropriate management options to achieve aims and objectives
- Prescriptions for management actions
- Preparation of a work schedule for securing biodiversity enhancements in perpetuity
- Details of the body or organisation responsible for implementation of the LEMP
- Ongoing monitoring and remedial measures
- Details of legal/funding mechanisms.
- A Sensitive Lighting Management Plan, covering both the construction and operational phases. The Plan shall comply with the recommendations of the Bat Conservation Trusts' document entitled "Bats and Lighting in the UK – Bats and The Built Environment Series"

The development shall be implemented wholly in accordance with the approved document.

- 5) No vehicle shall access the site (except vehicles required for clearance and preparatory works) unless and until the proposed vehicular, pedestrian and cycle access to Loxwood Road hereby approved has been implemented in accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1m high.

- 6) No development shall commence until a Construction Transport and Environmental Management Plan, to include details of:
- (a) the parking for vehicles of site personnel, operatives and visitors
 - (b) loading and unloading of plant and materials
 - (c) storage of plant and materials
 - (d) programme of works (including measures for traffic management)
 - (e) provision of boundary hoarding behind any visibility zones
 - (f) HGV deliveries and hours of operation
 - (g) measures to prevent the deposit of materials on the highway
 - (h) on-site turning for construction vehicles
 - (i) an indicative programme for carrying out of the works
 - (j) measures to minimise and control noise (including vibration) and dust during the demolition and construction phases
 - (k) details of any floodlighting
 - (l) details of measures to prevent harm to protected habitats and species, including retained woodland and grassland habitat and ditches.

has been submitted to and approved in writing by the Local Planning Authority. The construction of the development shall be implemented fully in accordance with the approved details.

- 7) Within one month prior to the commencement of the development, a site walkover by a qualified ecologist shall be undertaken to confirm the absence of badger presence on site. Should a new presence be identified, no works which may disturb the badgers shall take place unless and until a badger impact mitigation strategy has been submitted to and approved in writing by the Local Planning Authority.
- 8) No development shall take place until the Applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been previously submitted to and approved in writing by the Local Planning Authority.

Conditions requiring details to be submitted and approved during the construction phase of the development

- 9) Prior to the construction of the external surfaces of the buildings, samples of the materials (including windows and roof tiles) to be used within the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.
- 10) No development shall commence above damp proof course level until a detailed landscaping scheme, including the retention of existing landscape features, has been submitted to and approved in writing by the Local Planning Authority in

accordance with the Revised Landscape Strategy (Plan 657 01 A; Outline specification; and Typical planting schedule). The landscaping scheme shall include details of hard landscaping, planting plans, written specifications (including cultivation and other operations associated with tree, shrub, and hedge or grass establishment), schedules of plants, noting species, plant sizes and proposed numbers/densities and an implementation programme. Prior to the first occupation of the development, a tree planting strategy and methodology must be submitted and approved in writing following the guidance of British Standard 8545:2014 Trees: from nursery to independence in the landscape: Recommendations and Tree Species Selection for Green Infrastructure to ensure successful planting and establishment of all newly planted trees across the site. All hard and soft landscaping work shall be completed in full accordance with the approved scheme and implementation programme. Thereafter all trees and shrubs shall be retained and any planting which is damaged, becomes seriously diseased or dies within a 5 year period shall be replaced with planting in accordance with the approved details.

Conditions requiring details to be submitted and approved prior to occupation of the development

11) Each dwelling hereby approved shall not be first occupied unless and until that dwelling has been provided with:

- space which has been laid out within the site for that dwelling for vehicles to be parked and to turn so that they may enter and leave the site in forward gear, in accordance with the approved plans.
- covered secure cycle parking in accordance with a scheme which has been previously submitted to and approved in writing by the Local Planning Authority.

Thereafter the car and cycle parking and turning areas shall be retained and maintained for their designated purpose for the lifetime of the development.

12) The development hereby approved shall not be occupied unless and until each of the proposed dwellings and 20% of available visitor bays are provided with a fast charge electric vehicle socket (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. Thereafter, the electric vehicle charging points shall be retained and maintained for the lifetime of the development.

13) The following package of measures shall be implemented, at the Applicant's expense, through a S278 Agreement in accordance with details to be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development:-

- Implementation of two new bus shelters on Loxwood Road, including real time passenger information (RTPI) displays, bus cages, bus stop flags, poles, timetable cases, a footway connecting the site to the northern bus shelter, and the provision of an informal pedestrian crossing with tactile paving.
- 14) Prior to the first occupation of any dwelling hereby consented, details of a permissive footpath connecting the west of the site to Public Footpath 415a shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include the timescale for provision. The route shall then be provided in accordance with the approved details within such timescales as approved and maintained thereafter for the lifetime of the development. The route shall remain fully publicly accessible at all times other than when routine maintenance is being carried out.
- 15) Prior to the first occupation of the development, a detailed scheme for refuse and recycling shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate the siting and appearance of refuse and recycling storage for each dwelling, alongside details of the size and number of bins to be provided. The refuse and recycling provisions, including the provision of bins as specified, shall be made in accordance with the agreed scheme prior to the first occupation of the dwellings. Thereafter, they shall be retained in accordance with the approved details for the lifetime of the development.
- 16) The development shall not be occupied until written confirmation to the Local Planning Authority has been provided and approved to demonstrate that either:-
- (i) All upgrades required to accommodate the additional flows in to (freshwater) and out of (wastewater) the development have been completed; or-
 - (ii) A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.
- 17) Prior to the first occupation of any dwelling hereby consented, full details of the proposed Local Equipped Area of Play and Local Area of Play shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include the timescale for provision. The areas, including all identified play equipment, shall then be provided in accordance with the approved details within such timescales as approved. Thereafter, the equipment provided shall be retained and maintained in working order for the lifetime of the

development, accessible at all times other than when routine maintenance is taking place.

- 18) Prior to the first occupation of the development, details of a Water Use Strategy shall be submitted to and approved in writing by the Local Planning Authority, to demonstrate that water use would not exceed 110l per person per day. The development shall be completed fully in accordance with the approved details.
- 19) Prior to the first occupation of each phase of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority in relation to that phase. This must demonstrate that the drainage system has been constructed as per the agreed scheme (or detail any minor variations) and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).
- 20) Within three months of occupation of the 50th dwelling, a Travel Plan shall be submitted for the written approval of the Local Planning Authority, in consultation with the County Highway Authority, in accordance with the sustainable development aims and objectives of the National Planning Policy Framework, Surrey County Council's "Travel Plans Good Practice Guide", and in general accordance with the Framework Travel Plan, dated January 2021. The baseline shall be undertaken at 50% occupation. Upon approval the Travel Plan shall be shared with all first occupiers of the development and measures taken to promote the Travel Plan in accordance with specifications contained within it.

Condition requiring provisions to be made prior to occupation

- 21) Prior to the first occupation of the dwellings hereby permitted the highest available speed broadband infrastructure shall be installed and made available for use.

Compliance conditions

- 22) No machinery or plant shall be operated, no demolition or construction processes carried out and no deliveries taken at or dispatched from the site except between the hours 08:00–18:00 Monday to Friday, 08:00 – 13:00 on a Saturday and not at any time on Sundays, Bank or Public Holidays.
- 23) The approved development will be undertaken in accordance with the advice, conclusions and recommendations as set out within the submitted Arboricultural Impact Assessment, dated January 2021 (ref 201014 1068 AIA V1d - Part 1-5).
- 24) The development shall be implemented fully in accordance with all identified mitigation, compensation and precautionary working methodologies identified

within the accompanying Ecological Impact Assessment by EAD Ecology dated October 2020.

- 25) The plan numbers to which this permission relates are SK_001; T034_P1001; 1002; 1003; 1010; 1011; 1050; 1051; 1100; 1101; 1102; 1103; 1104; 1105; 1106; 1107; 1108; 1109; 1110; 1111; 1112; 1113; 1114; 1115; 1116; 1117; 1118; 1119; 1120; 1121; 1122; 1123; 1124; 1125; 1126; 1127; 1128; 1129; 1130; 1131; 1132; 1133; 1134; 1135; 1136; 1137; 1138.

The development shall be carried out in accordance with the approved plans.

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mr Robin Green of Counsel	Instructed by the Solicitor to the Council
<i>He called:</i>	
Katherine Dove MPlan MRTPI	Principal Planning Officer
Ian Brewster Fd Arboriculture	Tree and Landscape Officer
John-Paul Friend BA (Hons) Dip LA CMLI	Director of LVIA Ltd
Kate Edwards MA MRTPI	Principal Planning Officer
Barry Devlin (S106 only)	Planning Solicitor

FOR THE APPELLANT:

Sasha White QC Mathew Fraser of Counsel	Both instructed by Thakeham Homes Ltd
<i>They called</i>	
Jonathan Dodd BA (Hons) MPlan MRTPI	Associate Director, Turleys
Peter Wharton BSc (Hons) FArborA MICFor	Director, Wharton Natural Infrastructure
Joanna Ede BA (Hons) MA DipLD CMLI	Director, Turleys
Stephanie Howard BSc (Hons) MSc CTPP MCIHT CMILT	Technical Director, WSP
Tim Burden BSc (Hons) MSc MRTPI	Director, Turleys

Interested Person

Mary Brown MBA MSc	Local Resident
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DOCUMENTS SUBMITTED AT THE INQUIRY:

Local Planning Authority Documents

LPA1	Opening Statement
LPA2	Sustainability Appraisal (SA) of the Waverley Local Plan: Part 1 Page 24
LPA3	Table showing locations within Alford Parish of completed and consented schemes 2013 to April 2021
LPA4	Email and plan from Ian Brewster dated 10 December 2021
LPA5	Five-Year Housing Land Supply Update Note December 2021 including plans of

- LPA6 Dunsfold Aerodrome and Officer report for planning application WA/2021/01450 Document regarding outstanding planning permissions on small sites comparing aerial photography with site plans
- LPA7 CIL Compliance Statement
- LPA8 Conditions
- LPA9 Pre-Submission Waverley BLP Part 1: Strategic Policies and Sites. Schedule of Main Modifications
- LPA10 Closing Submissions

Appellants' Documents

- APP1 Waverley Borough Council February 2018 Adopted Policies Maps West and East
- APP2 Extracts from West Surrey SHMA Report September 2018 G L Hearn Limited
- APP3 Waverley Borough Council 5YHLS Scott Schedule - Appellant & Council 3.12.21
- APP4 Email from Katherine Dove to Jonathan Dodd dated 3.12.21 re completions
- APP5 Opening Statement
- APP6 Extracts from GLVIA Third Edition
- APP7 Waverley BC Committee Report re WA/2015/2261
- APP8 Waverley BC Committee Report re WA/2019/0745
- APP9 Final 5YHLS Position Statement
- APP10 Waverley Borough Council 5YHLS Scott Schedule - Appellant & Council 12.12.21
- APP11 Supplemental 5YHLS Position Statement
- APP12 Sustainability Appraisal (SA) of the Waverley Local Plan: Part 1 Pages 24 & 25
- APP13 Section 106 Agreement
- APP14 Email from Tim Burden dated 14.12.21 re pre-commencement conditions
- APP15 Closing Submissions

Interested Persons Documents

- IP1 Statement by Mary Brown

APPENDIX 11:

Central Lancashire Core Strategy Inspector's Examination Report (2012)



The Planning
Inspectorate

Report to the Central Lancashire Authorities (Preston City Council and South Ribble and Chorley Borough Councils)

by Richard E Hollox BA(Hons) BSc(Econ) MPhil FRTPI FRICS

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 7th June 2012

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20

REPORT ON THE EXAMINATION INTO THE CENTRAL LANCASHIRE
PUBLICATION CORE STRATEGY LOCAL DEVELOPMENT FRAMEWORK
DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 31 March 2011

Examination Hearings held between 28 June & 12 July 2011 and on 6 March 2012

File Ref: PINS/D2320/429/7

Abbreviations Used in this Report

BTP	Background Topic Paper
CBD	Central Business District
CfSH	Code for Sustainable Homes
CIL	Community Infrastructure Levy
CLRLR	Central Lancashire Retail and Leisure Review
CS	Core Strategy (the Local Plan – strategic part)
DPD	Development Plan Document
EB	Evidence Base
ELR	Employment Land Review
IDS	Infrastructure Delivery Schedule
HLF	Heritage Lottery Fund
LDS	Local Development Scheme
MM	Main Modification
MR	Monitoring Report
NPPF	National Planning Policy Framework – the Framework
NWRDA	North West Regional Development Agency
OED	Oxford English Dictionary
PCT	Primary Care Trust
PHRCs	Proposed Housing Related Changes
PMF	Performance Monitoring Framework
PPS	Planning Policy Statement
PPTS	Planning Policy for Traveller Sites
RPB	Regional Planning Body
RS	Regional Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
TRA	Tithebarn Regeneration Area

Non-Technical Summary

This Report concludes that the Central Lancashire Publication Core Strategy Local Development Framework Development Plan Document (the Local Plan) provides an appropriate basis for the planning of Central Lancashire over the next 15 years provided that a number of modifications are made to the Plan. The Councils have specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. These modifications, comprising 2 Main Modifications (MM), are summarised as follows:

MM1

- The adoption of RS annual average housing requirements, being 507, 417 and 417 for Preston City, and Chorley and South Ribble Boroughs respectively
- The identification of Cottam as a Strategic Site, with site plan, instead of as a Strategic Location
- The identification of 2 additional Strategic Locations, namely North West Preston including Higher Bartle & Broughton/Land at Eastway and at South of Penwortham & North of Farington
- Table 1 setting out the Predicted Proportions of Housing Development by Location, thereby indicating the scale of development in the main locations during the periods 2010-16, 2016-21 and 2021-2026
- Associated explanation and description of the Strategic Sites and Locations
- Explanation of the monitoring and contingency arrangements, particularly the role of the Performance Monitoring Framework should housing delivery fall below 80% of the housing requirements over a 3 year rolling average
- Greater emphasis on financial viability, site by site assessment and the seeking of planning obligations particularly with regard to affordable housing

MM2

- A policy concerning the presumption in favour of sustainable development

Introduction

1. This Report contains my assessment of the Central Lancashire Publication Core Strategy Local Development Framework December 2010 (the Local Plan – strategic part) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers whether it is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (the Framework) paragraph 182 makes clear that to be sound, a Local Plan should be positively prepared; justified, effective and consistent with national policy. There is also now a “duty to co-operate”. The 3 Authorities, Chorley and South Ribble Borough Councils and Preston City Council, have worked closely together and have consulted neighbouring Authorities. This duty did not apply when this Local Plan was submitted in March 2011, but I am satisfied that these neighbouring Authorities have been involved in the preparation of the Local Plan to the extent that was reasonable and beneficial at the time.
2. The starting point for the examination is the assumption that the local authorities have submitted what they consider to be a sound plan. The basis for my examination is the submitted Central Lancashire Publication Core Strategy Local Development Framework which was published in December 2010. It is the same as the document published for consultation upon which formal representations were made within an 8 week period ending on 31 January 2011. It was submitted to the Secretary of State (the Planning Inspectorate) on 31 March 2011 with Proposed Minor Changes which I have taken into account in my assessment. I refer to the Core Strategy throughout this Report as the Local Plan.
3. Like the RS and the Local Plan, my Report should be read as a whole. It deals with the 2 Main Modifications which are needed to make the Local Plan sound. These Main Modifications comprise, firstly, the Proposed Housing Related Changes (PHRCs) November 2011, a separate document which accompanies this Report as Appendix A and, secondly, the inclusion of a policy setting out the presumption in favour of sustainable development, attached as Appendix B. In accordance with Section 20 (7C) of the 2004 Act, the Councils have requested that I make any modifications needed to rectify matters that make the Local Plan unsound and thus incapable of being adopted. The first Main Modification was the subject of public consultation for a period of 6 weeks between 1 November and 13 December 2011, with suitable arrangements for wide publicity. A Revised Sustainability Appraisal and Revised Habitat Regulations Assessment Screening Report were included in the consultation packs, and these documents complement the appraisals undertaken for the submitted version of the Local Plan. I recommend that the Local Plan be modified as set out in the PHRCs (MM1).
4. The Government published the Framework on 27 March 2012, replacing a number of Planning Policy Guidance notes (PPG), Planning Policy Statements (PPS) and other documents as set out in its Annex 3. A few days before then, it published the Planning Policy for Traveller Sites. The Framework is a strategic document which cuts across a number of matters in the Local Plan which could be affected by its policies. Hence representations on it, and on the Planning Policy for Traveller Sites, in so far as they relate to the Local Plan, were invited from 11 April 2012 until 9 May 2012. Further

representations were invited from 23 April 2012 until 9 May 2012 on a model policy concerning the presumption in favour of sustainable development. I have taken account of all the responses made, including those of the Councils. The Councils suggest that this model policy be set out at the start of the Local Plan, *accompanied by some factual text to simply explain that the national policy situation was revised during the Strategy's preparation and that the model policy has been included to clarify the operational relationship between the plan and national policy.*

5. This is a sensible approach and to it should be added the important point that the Framework is a material consideration in the determination of planning applications. Sustainability is the golden thread which runs through the Local Plan, and to that extent the model policy can be regarded as its central theme and, indeed perhaps, a summary of it. Owing to its importance, however, it should be treated as a Main Modification (MM2). I therefore recommend that the Local Plan be modified by the inclusion of a policy which, in essence, confirms that the Councils will take a positive approach that reflects the presumption in favour of sustainable development contained in the Framework. It is set out in full at Appendix B.
6. The Councils intend to make a number of Additional Modifications which, in essence, would provide updating and clarification. They would assist the full understanding of the Local Plan and its objectives. For the most part they arise from discussions at the Hearings and negotiations between the Councils and other participants, but I seldom refer to them in my Report because they do not go to the soundness of the Local Plan. They are mainly amendments to the drafting of policies and their supporting text, being factual updates, corrections of minor errors or other minor amendments. My recommendations concerning the Main Modifications will make the Local Plan sound and capable of being adopted. Thus representations which do not relate to the Main Modifications would not make an unsound plan sound. Nevertheless, the Councils will no doubt consider all of them and make any further additional modifications which arise from them, as they see fit. They include those made by the Coal Authority on the Framework concerning Mineral Safeguarding Areas (MSA), but this may be more a matter for the County Council as the Minerals Planning Authority.
7. The Councils suggest that references to superseded Planning Policy Guidance (PPG) and Planning Policy Statements (PPS) can be deleted as minor changes to the Local Plan. This would be helpful. The Councils may also wish to note that where a Local Plan contains a policy that is intended to supersede another policy in the adopted development plan, they should state that fact and identify the superseded policy.

Assessment of Soundness

Preamble

8. The North West of England Plan RS to 2021 became the adopted planning policy for the North West of England in September 2008. On 6 July 2010 the revocation of RSs was announced with immediate effect, but that decision was challenged and then quashed on 10 November 2010. This was followed on the same day by a written Ministerial Statement, a letter from the Chief

Planner with an attached clause from the proposed Localism Bill and a Department of Communities and Local Government media statement, all of which were the subject of a further challenge on the grounds that they were not capable of being a material consideration and hence not to be considered by decision makers.

9. On 7 February 2011 the Court found that the statement and letter and hence the intention to repeal the legislative provision for regional strategies were capable of being a material consideration and that weight to be attached to it was a matter for the decision maker. This position was tested before the Court of Appeal and its judgment was published on 27 May 2011. It critically distinguishes between development control and the preparation of development plans. For the latter, and of vital importance in the status of the RS and the examination of the Local Plan, paragraph 24 of the judgment states that *it would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents to have regard to the proposal to abolish regional strategies. For so long as the regional strategies continue to exist, any development plan documents must be in general conformity with the relevant regional strategy.* The RS thus remains part of the statutory development plan, and it is of especial relevance in the matter of housing delivery in Central Lancashire.
10. As set out in my letters to the Councils of 15 & 27 July 2011 (included within Appendix A), I need to be satisfied that a sufficient amount of housing land can be delivered at the right time and in the right places during the plan period, and I am not convinced that the Local Plan as submitted achieves these important objectives. In matters of housing, it does not generally conform with the RS nor does it accord with the Framework by boosting significantly the supply of housing including the identification of a supply of specific, developable sites sufficient to provide 5 years worth of housing against local housing requirements and of specific, deliverable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. These shortcomings are so fundamental that they cannot be left to be put right in Site Allocations DPDs. The Local Plan should provide a suitable basis for the preparation of the next, more detailed stage of the development plan, particularly the Site Allocations DPDs, by leaving no doubt where, when and how the correct amount of housing will be delivered. In these respects, the Local Plan in its submitted form is not sound and should not be adopted.
11. Following my 2 letters, the Councils substantially revised their proposals. In essence, the Main Modification comprising the PHRCs identifies 4 Strategic Sites compared with the previous 3 together with 2 additional Strategic Locations. These Strategic Locations are at North West Preston (including Higher Bartle & Broughton/Land at Eastway) and at South of Penwortham & North of Farington. It is perhaps unusual for a Main Modification to comprise a 14 page document, but its contents are strongly related to each other and it goes in its entirety to the heart of the Local Plan, making it sound. As the Councils agree, this is a tidier and more sensible approach than attempting to make a specious distinction within it of those contents which might be regarded as either Main or Additional Modifications.

Main Issues

12. Taking account of all the representations including the written evidence, the discussions at the examination hearings as well as my site inspections throughout the plan area, I have identified 7 main and complementary issues. It is upon them that the soundness of the Local Plan depends.

Issue 1 – Whether the Local Plan's vision and proposals for sustainable growth are clear, effective, deliverable and consistent with all national policy

The Vision

13. The Local Plan succinctly and convincingly sets out the key spatial challenges facing Central Lancashire. They include congestion into and out of Preston, a low level of house building due to the current economic climate, frustrated economic growth potential, inadequate investment in City and town centres, often poor access to and inadequate supply of affordable housing, pressure on the countryside, various aspects of deprivation and an ageing population with its attendant concerns of health, mobility and dependency.
14. The vision for the plan area in 2026 is explained in short but lucid terms. It is to be a highly sought-after place in which to live and work with a high quality of life for all its residents. It will benefit from its valuable assets, including its location at the hub of the motorway, road and rail network, its extensive green spaces including its parks and the ready access to open countryside. High quality City and town centres will attract investment as a result of their retail, heritage and education offer. The centre of Preston will be regenerated and transformed and, although it is unlikely to provide the extensive range of attractions of Liverpool or Manchester, it will offer high quality retail, cultural, entertainment, business and higher education opportunities. Owing to the size and role of its railway station, its comprehensive bus services and its location, it will continue to be a "transport gateway" to Lancashire.
15. The City, towns and villages of Central Lancashire have a distinctive character, and the vision is to reflect their particular historic and cultural heritage, enhancing their character with a high quality of design of any new buildings permitted within them. This approach accords with national policy in the Framework wherein the Government attaches great importance to the design of the built environment. Good design, it says, is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people. The openness and special character of the countryside will be protected, consistent with the need for sustainable development, and there will continue to be a presumption against inappropriate development in the Green Belt. Residents will have easy access to public services, good jobs and decent, high quality affordable homes. Energy use will be minimised with an emphasis on sustainable sources, including mitigation measures and, where possible, adaptation to climate change. These important considerations, too, accord with national policy in the Framework.

Proposed Location of Growth - Strategic Locations and Sites

16. The Local Plan includes 31 policies, each one of which contributes to the vision. Of especial importance in establishing its sustainability credentials is its Policy 1: Locating Growth. Its thrust is to concentrate growth and investment on well located previously-developed land in the Preston/South Ribble Urban Area, focussing on regeneration opportunities in the Central Preston Strategic Location which includes Inner East Preston, the Tithebarn Regeneration Area (TRA) in the City Centre and the new Central Business District (CBD). The Councils consider that a target of 70% of residential development on previously-developed land is still achievable. This is not greatly different from the RS indicative target of at least 70%.
17. Although circumstances have changed, with garden land not now treated as previously-developed land, the record shows that 53% to 96% of dwellings completed (gross) in Central Lancashire during 2003/04 to 2010/11 have been on previously-developed land. Other evidence gained from site inspections throughout the plan area is consistent with the Councils' view that this type of land continues to come forward, and the extent of this well-located resource makes 70% a realistic aspiration. It corresponds with national policy in paragraph 111 of the Framework of encouraging the effective use of land by re-using land that has been previously developed, provided that it is not of high environmental value.
18. Further growth, including some greenfield development, is proposed in the northern suburbs of Preston, particularly at the Cottam Strategic Location. Preston City Council has resolved to grant planning permission, subject to a Section 106 Agreement, for residential development, a superstore and employment floorspace at Cottam Brickworks. Cottam Hall is a Local Plan allocation that has been partly developed but is now subject to a revised master plan; an outline planning application has been submitted for residential development with one parcel likely to accommodate about 100 dwellings being tendered for disposal. Owing to their combined size, substantial contribution to the City's housing requirements and the advanced nature of proposals for them, these 2 sites are together reasonably defined as a Strategic Site in the PHRCs.
19. The PHRCs provide for 2 additional Strategic Locations at North West Preston (including Higher Bartle & Broughton/Land at Eastway) and at South of Penwortham & North of Farington. The PHRCs note that, *altogether, 35% of the dwellings in the Core Strategy are predicted to be developed at Strategic Sites and Locations, with over 90% of all proposed new housing in urban locations that occupy the central spine of the plan area.* This 90% is, however, questioned in some representations. Much of the 2 additional Strategic Locations is essentially open and rural in character, but the continuing re-use of previously-developed land in existing urban areas will no doubt contribute to this high proportion. Only time will tell whether this 90% will be achieved, but of greater relevance is the position of these 2 Strategic Locations close to the extent of the main Preston and South Ribble built-up area and the opportunities which it affords in terms of access to services, particularly public transport, and the potential for their improvement, to wider benefit.

20. It is clear from the Hearings that these 2 additional Strategic Locations are broadly supported by the majority of the represented house builders, and this bodes well for deliverability. There is no reason to doubt the attractiveness of the homes to be built to prospective purchasers. The Councils' evidence that infrastructure requirements have been thoroughly assessed is not seriously challenged. This has involved close liaison with key providers and transport modelling work. The County Council and the Highways Agency have been working closely together and advise that, in North Preston, the road *network is reaching a critical point in the level of additional traffic that could be accommodated and there is a very real risk that the economic benefits of supporting development are lost. There must come a point where additional traffic can no longer be accommodated without unacceptable impacts or the need for much wider strategic infrastructure improvements to support further development.*
21. It would appear that a programme of sustainable transport measures including for bus priority, park and ride, walking and cycling would result in no more than a mere 5% reduction in vehicle trips. The Local Transport Plan Implementation Plan for 2011/12 to 2013/14, adopted in October 2011, commits to the delivery of a Highways and Transport Master Plan for Central Lancashire by 2013 but it is now expected to be completed by September 2012. It will set out a highways and transport strategy linked to economic development and spatial planning priorities, including those set out in the Local Plan. It will also identify priorities for investment in support of the Government's proposed "Devolving Local Major Transport Schemes" proposals. The County Council understands that developers with an interest in North West Preston support this approach, and there is no convincing evidence to the contrary.
22. A good deal of further work must be undertaken to devise highways and transport arrangements which will meet usual objectives including the safe, convenient and free flow of traffic and priority where appropriate for public transport, pedestrians and cyclists. It is significant that there is no objection in principle from the Highways Agency and that the County Council as Highways Authority continues to support the Local Plan's proposals, with the important proviso that delivery of the scale and distribution of development now proposed will necessitate major additions to existing transport infrastructure to serve these 2 Strategic Locations.
23. The County Council adds that it would seem sensible to acknowledge the Highways and Transport Master Plan as a prerequisite to informing the production of detailed proposals for additional supporting infrastructure to come forward at the Strategic Locations, to be set out in the Site Allocations DPDs. The omission of its suggested text in its Strategic Highways and Transport Position would not render the Local Plan unsound, but the Councils may wish to include it as a useful Additional Modification. The main point is that there is no convincing evidence to suggest that, provided the Councils continue to liaise with all relevant parties in a collaborative way, as the Framework paragraph 179 requires, these Strategic Locations will not be able to deliver the intended amounts of housing and associated infrastructure, maybe to a great extent by way of CIL, during the plan period.

24. The track record so far is good. The planning permission for 450 dwellings at Haydock Grange refers to a negotiated Section 106 Agreement for a contribution towards improvements to Broughton roundabout at the M55 Junction 1 whilst there is a unilateral undertaking by the developers of the former Whittingham Hospital to fund about 70% of the cost of the proposed Broughton Bypass, the remainder being funded by the County Council. These examples instil confidence that the Councils will secure reasonable contributions using the most appropriate measures, and in particular for the key infrastructure requirements for the proposed 2,500 dwellings at North West Preston and the proposed 1200 dwellings at South of Penwortham & North of Farington.
25. Strategic Sites for employment are allocated at BAE Systems at Samlesbury, part of which has recently been designated with Enterprise Zone status, at Cuerden and for mixed use at Buckshaw Village. Buckshaw Village is accommodated on the site of a former Royal Ordnance munitions factory which closed in the 1990s. By April 2010 about 1730 dwellings had been completed on this previously-developed land and the PHRCs note the capacity for another 2300.

Proposed Location of Growth – Other Places

26. Key Service Centres are proposed at Leyland/Farington, Chorley and Longridge. Six Urban Local Service Centres are identified to help meet housing and employment needs and limited growth and investment is proposed at 3 Rural Local Service Centres. The identification of these centres for the stated purposes makes sense. The scale of growth suitably complements the existing and likely future range of services in each one. In other places, including the smaller villages, development will be typically small in scale and limited to such schemes as infilling, conversions and to meet local needs.
27. Exceptionally, larger scale development schemes may be permitted, but as a matter of principle there is little point in encouraging significant growth in places where services are limited, likely to remain so and where it would be all too likely to result in travelling to larger centres for work, education, shopping and leisure, and often on roads ill-suited to accommodate substantially more traffic. Such growth would be better invested where it would do more good, especially for the purpose of regeneration. Policy 1 achieves a commendable balance in this respect between its support for rural settlements and its encouragement of investment in the urban areas where renewal should be promoted.
28. A useful comparison can be made between, on the one hand, Charnock Richard and Mawdesley, 2 smaller villages each with a limited range of services, neither having a supermarket, railway station, frequent bus service to Preston or significant employment opportunities, and on the other hand the nearby Rural Local Service Centre of Eccleston with its good range of shops, other services and employment opportunities within and near its Carrington Centre and between Lord Street and Bradley Lane. The evidence base (EB) underpinning these proposals includes the Strategic Sites and Locations Assessment which sets out the reasoning behind their selection as well as the reasons why other sites/locations have not been favoured. The Assessment

includes descriptions and a comprehensive criteria-based analysis of contending sites and locations and is convincing in its conclusions. Evidence from site inspections, and particularly of the difference in the range of services at various settlements, accords with them.

29. Various other sites, including Ingol Golf Course, Park Hall/Camelot, New Street (Mawdesley) and several Green Belt sites are put forward by other participants for mainly residential development. For a number of reasons, particularly the protection of valued open space, poor location with regard to services, rural settlement policy and the need to protect the Green Belt respectively, their identification for development would not result in sustainability. Investment and the housing needs of Central Lancashire would be better promoted elsewhere where a good range of services is, or is likely to be, provided and/or enhanced. This conclusion accords with such sustainability objectives as the urgent need for regeneration, as in Inner East Preston. This is part of the Councils' commendable strategy. The Green Belt is a policy restraint and, for conveniently following the order of the Local Plan, I deal with it under Issue 7. It suffices to say here that it should not be altered.

Other Policies and Proposals

30. Policy 3: Travel complements this approach by seeking to reduce the need to travel, especially by car. Measures include better opportunities for cycling by completing the Central Lancashire Cycle Network of off-road routes and by improving public transport. New railway stations are proposed at places where substantial development is, or will be, taking place or already exists, as at Cottam (park and ride), Midge Hall and Coppull. A new railway station opened at Buckshaw Village in October 2011. A bus rapid transit system will be created on routes into Preston and to Leyland and Chorley, and a ring of new bus-based park and ride sites will be provided at Broughton Roundabout, Tickled Trout, Penwortham, Cuerden and Riversway. Improvements are proposed to Preston and Leyland rail stations and there is an aspiration of a new bus station as part of the Tithebarn Regeneration Area (TRA).
31. Other provisions, including Policy 16: Heritage Assets, Policy 19: Areas of Separation and Major Open Space and paragraph 10.12 concerning the Green Belt, serve to protect and enhance features of especial importance. Policy 27: Sustainable Resources and New Developments seeks to incorporate sustainable resources into new development through such measures as minimum requirements under the Code for Sustainable Homes (CfSH). At present the building regulations are equivalent to meeting CfSH Level 3 in terms of the energy standards but not the whole CfSH Level 3, and the Policy seeks to increase the requirement to CfSH Level 4 from January 2013 and Level 6 from January 2016. The Opportunities for Renewable Energy in Preston (EB7), South Ribble (EB8) and Chorley (EB9) set out the considerable potential for sustainable resources throughout the plan area. The evidence base is sufficiently convincing to justify the Policy in terms of requirements rather than expectations. Policy 28: Renewable and Low Carbon Energy Schemes encourages developments of these types, consistent with other objectives to protect the environment. The 2 latter Policies in particular are consistent with a key Government priority of tackling climate change.

Flexibility, Contingencies and Review

32. The Local Plan adopts the most appropriate strategy when considered against the reasonable alternatives. But its paragraphs 1.7 and 1.8 rightly identify trends and changed circumstances which underline the need to plan with flexibility. To be effective, it must demonstrate that it can deal robustly with changing circumstances. This presents especial challenges at present, given the generally depressed state of the national and local economy. It means that the delivery of its housing strategy in particular cannot come with a cast iron guarantee throughout the 15-16 year plan period. The PHRCs suitably deal with this uncertainty. They acknowledge that the RS housing figures are *minimum requirements, net of demolitions*, that they are *not absolute targets and may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies*.
33. At present, it is more likely that housing delivery will under-perform than exceed expectations. The PHRCs confirm the importance of monitoring, with rolling 3 year periods to accommodate short-term fluctuations in house completions on both green field and previously-developed land. A one year period would give too much emphasis on too short a period, whereas a period of 5 or more years could result in too great a difficulty in bringing housing delivery back on track. A 3 year period is a reasonable compromise and makes good sense. Should housing delivery fall below 80% of requirements during a 3 year rolling average, the phasing policies in the Site Allocations DPDs could be changed to help bring forward uncommitted developments and closer management of delivery with key partners may be pursued..... *If these fail to remedy the situation, the Councils would consider reviewing policies with the aim of bringing forward additional/alternative sites for housing development*.
34. Some participants would prefer more detailed intentions, but the Contingency Options (REC6 in the Proposed Minor Changes February 2012) serve to *better manage the delivery of development (eg access to finance, including grants, consider reviewing S106 Agreements and contributions)*. This is helpful clarification. There is no reason to doubt the Councils' intentions to keep house building rates under review and deal effectively with any significant under-performance, thereby maintaining the delivery of a continuing 5 year supply of housing land to meet the housing requirement. Such delivery should, however, be in accordance with the Local Plan's overall vision and sustainability credentials.
35. The PHRCs state the Central Lancashire Authorities' intention, as a matter of urgency, to review partially the Local Plan in respect of housing requirements. This would, it states, following the proposed revocation of the RS, give the Councils the scope to produce locally derived housing requirement figures. This intention is criticised as undermining their commitment to the delivery of housing, creating needless uncertainty for developers and other parties in the provision of infrastructure and compromising the longer term certainty which a development plan should provide. These concerns, from a developer's point of view, are understandable, but democratically elected Councils have the discretion to review, or partially review, their plans as and when they see fit.

That is the case whether or not the Local Plan includes that statement. It is not a matter of soundness.

Positive Preparation

36. The Framework introduces an additional test of soundness, that a Local Plan should be positively prepared. Arguably, as this requirement came after the initial preparation of the Local Plan, it does not apply in this case. Nevertheless, it has been prepared on a strategy which seeks to meet objectively assessed development needs, particularly housing, and seeks to provide for infrastructure requirements. Consultation and cooperation has been comprehensive and effective. It has been positively prepared.

Conclusion

37. The Local Plan is clear in terms of its vision and proposals. It ensures an appropriate scale of development in accordance with the existing or proposed size of the settlement and the present and/or future range of its services, including public transport. It accords with the principles which underpin the RS. In particular, it promotes sustainable communities and sustainable economic development, it makes the best use of existing resources like existing infrastructure and well-located previously-developed land, it manages travel demand, marries opportunity with need, promotes environmental quality and serves to reduce emissions. In these ways it is fit for purpose and therefore effective. The extent to which it is deliverable will much depend upon the economic climate throughout the plan period, especially with regard to housing and economic development. Its clarity, the Councils' praiseworthy achievements so far in securing infrastructure and the reasonable prospect of more of the right sort of infrastructure being provided in the right place at the right time is conclusive evidence of realistic deliverability.
38. Its strategy accords with national policy, particularly of facilitating and promoting sustainable and inclusive patterns of urban and rural development. It will, for example, ensure that development supports existing communities and facilitates the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community. It will contribute to global sustainability by addressing the causes and potential impact of climate change, for example by encouraging a pattern of development which reduces the need to travel by private car and by taking climate change impacts into account in the location of development. It accords with the Government's commitment to protect and enhance the quality of the natural and historic environment in both rural and urban areas. In all these respects, it accords with the purpose of planning which is to help achieve sustainable development.
39. The presumption in favour of sustainable development is the golden thread which runs through the Local Plan. The general approach of the Local Plan, its vision and proposals, particularly as expressed in the policies identified, are justified, effective and accord with national policy. It has been positively prepared. In these respects, it is sound.

Issue 2 – Whether the Local Plan provides satisfactorily for the delivery of development, particularly its required infrastructure, and convincingly demonstrates adequate monitoring of its provision and measures designed to rectify any shortcomings

40. The Infrastructure Delivery Schedule (IDS) (March 2011) is rightly described as a living document. It itemises infrastructure projects already envisaged and which will probably be needed to support the quantity and broad location of development which the Local Plan proposes. It sets out the likely time of implementation, the costs, sources of funding and the current deficits, these being the funding shortfalls after taking account of money already secured. It is thorough and comprehensive in its approach, dealing with public transport schemes, cycle schemes, highway improvements, public utilities, education, health and green infrastructure including outdoor sports and townscape. Nevertheless, economic conditions and the availability of finance are likely to change during the plan period, and it is the nature of planning to deal with uncertainty in as pragmatic a way as possible. The IDS rightly acknowledges this at its paragraph 2.
41. The IDS is part of the evidence base and it will be updated on a regular and frequent footing, thereby complementing each Authority's Monitoring Report (MR). Key local partners including the Highways Agency, the Environment Agency, the Central Lancashire Primary Care Trust (PCT), Lancashire County Council, Sport England and United Utilities confirm their close working relations with the Councils and their engagement with, and support for, the Local Plan. There is convincing evidence of a good understanding between the Councils and their partners. There have also been discussions with developers who would be expected to make contributions in accordance with tests set out, for example, in the Framework concerning planning obligations and those relating to the Community Infrastructure Levy (CIL).
42. A good example of the need to, and experience of, consultation, monitoring and updating where necessary is the proposed Preston Bus Station, estimated to cost £24,000,000, although unfortunately now more of an aspiration than a firm proposal. It was originally thought that the now defunct North West Regional Development Agency (NWRDA) would contribute £10,000,000, the County Council £7,500,000 and the Tithebarn developer and the City Council between them the remaining £6,500,000. The evidence is that a Tithebarn regeneration scheme cannot proceed without the demolition of the existing bus station, and that any cost shortfall will be made good by the developer, this contribution being a small percentage of the overall cost of the scheme. The developer has accepted the risk of no funding being forthcoming from the NWRDA. There is no doubt that the Authorities are well aware of the inevitability of changes in financial circumstances on the various projects and that adjustments will have to be made accordingly. The IDS provides the means of doing so.
43. The IDS is realistic in its acceptance of uncertainty. For example, the bus rapid transport routes, including the Preston – Tardy Gate – Leyland project, estimated to cost £83,000,000, are envisaged to be subject to bids to Central Government derived funds and contributions from developers. There is no point in raising false hopes, and the IDS rightly accepts almost all of this sum as a deficit. Undoubtedly the Councils' encouragement of public transport will

continue and they will enthusiastically progress this bid, seek developer contributions and do everything practicable to implement the routes during the stated 6 year period (2012-2018). There is no reason to doubt their commitment to carry on working closely together and with the fund providers and thereby remain aware of and secure the necessary infrastructure to deliver the strategy. The evidence is convincing in that this determination will continue in a joint officer/member group and driving force as the Site Allocations DPDs are prepared, its proposals implemented and the implications of the CIL explored. All this ensures that the IDS will remain realistic.

44. Good progress has already been made on some projects, and this instils further confidence. As mentioned, at Buckshaw Village a new £7,000,000 railway station has been opened. A primary school has opened there and funds have been secured for an additional second form entry (extension). Developer contributions have been secured for primary schools at Whittingham. Contributions from the PCT and developers have been secured for new and improvements to existing clinics and health centres (eg at Eccleston) as they have for improvements at Preston and Leyland Rail Stations. There is no evidence to suggest that a host of relatively minor schemes, including highway improvements and cycle paths, will not be funded entirely or mainly by developers. Thus, while the IDS indicates deficits for a large number of schemes, there is compelling evidence that it is as realistic as it can be in the present economic climate for the wide range of projects envisaged during the plan period. The Local Plan will be monitored annually to ensure that its policies are effective and reflect changing national, regional and local circumstances. The Performance Monitoring Framework (PMF) convincingly demonstrates that all 13 of its indicators rely on information which can be gathered and analysed, will inform the MRs and assess the Local Plan's performance.
45. Policy 2: Infrastructure sets out the Councils' approach to securing physical, social and green infrastructure. It envisages contributions negotiated in Section 106 agreements and usefully looks ahead to accommodate tariffs arising from the CIL. As drafted in the Local Plan, however, the Policy is somewhat more demanding than it should be. It does not entirely accord with the Framework which states that planning obligations should be sought only where they meet all 3 of its tests. The Suggested Examination Hearing Changes do, however, put this matter right and provide useful clarification. The point is also confirmed in MM1 paragraph 5.27 where the emphasis is on developers being expected to provide for, and/or contribute to, infrastructure and the seeking of financial contributions. Crucially, it is now abundantly clear that developer contributions will be sought through negotiation, not demanded or imposed.
46. The IDS and the PMF are essential management tools in delivering the strategy of the Local Plan. They will give the Councils and their partners the opportunity to review progress, identify funding priorities and gaps and make any necessary adjustments. The length of the plan period and the present financial climate make aspirations, rather than guarantees, inevitable but this should not be construed as raising false hopes. The IDS takes a pragmatic approach in uncertain times and is clear, comprehensive and convincing. There is a realistic prospect of the infrastructure being in place in a timely

fashion to support the strategy. The provisions for the delivery of infrastructure, supported by the IDS and PMF, are justified, effective and comply with national policy. In these respects, the Local Plan is aspirational but realistic; and sound.

Issue 3 – Whether the Core Strategy is effective in meeting local housing needs, including the provision of an appropriate mix of housing of suitable quality and at suitable densities

The Thrust of Policy 4

47. Policy 4: Housing in the submitted version of the Local Plan sets and applies a short-term maximum requirement at 80% of the RS figures for 2010-2012, or until such time as new local housing requirements are produced, and pending the adoption of Site Allocations and Policies DPDs. Annual requirements for Preston, South Ribble and Chorley are thus 406, 334 and 334 respectively, instead of 507, 417 and 417, making the annual requirement for Central Lancashire during these 2 years 1,074 instead of 1,341. This interim 20% reduction is to apply as a capping measure not to be exceeded and is described as a precautionary approach to help avoid undermining Policy 1. The Councils sought to justify it on the basis of the now replaced PPS 3 (paragraph 64). These provisions make the submitted Local Plan unsound, for reasons set out in my letters to the Councils of 15 and 27 July 2011, but they have been suitably replaced by relevant parts of the PHRCs.
48. The RS and Local Plan periods are not identical. The RS provides a framework for development and investment in the region from 2003 up to a limited period beyond 2021 whereas the Local Plan period is 2010-2026. These periods are not greatly different, they both address the foreseeable future and they give no good reason to justify any significant departure from the RS housing requirements. These changes restore the annual minimum RS requirements during the plan period and hence provide for a total of 21,456 (1,341 x 16) dwellings. A prior under-provision of 702 dwellings is to be made up during the remainder of the plan period, a grand total of 22,158 (say 22,200) dwellings. This minimum requirement can be achieved as a result of the identification of the 2 additional Strategic Locations.
49. This approach is commendable. It goes some way to meeting the urgent need for affordable homes and, by acknowledging the role of housing as a driver of the economy, supports the potential for economic growth and local regeneration strategies. It does not prolong the uncertainty until such time as the new local housing requirements are approved, as is the case with Policy 4 in the submitted version of the Local Plan. The provisions of the PHRCs accord with RS housing requirements and the intention of the Framework to boost significantly the supply of housing. In these ways, they serve to make the Local Plan sound.

Strategic Sites and Locations and the delivery of housing

50. Table 1 in the PHRCs gives a good indication of the amount of housing to be provided in total (22,200) and in terms of location and 5/6 year periods. The Councils have been able to draw on preparatory work for, and consultations on, their Site Allocations DPDs. Updated SHLAA data (2011) and the views of representative house builders have been incorporated. Owing to the general

unattractiveness of permitted apartment schemes and doubts about their realisation, the Councils have not included them in their calculations. These schemes relate to sites at Tithebarn, Queen Street and Avenham Lane and total 1,315 dwellings. Although inevitably broad brush in nature with some figures questioned, this Table is a most welcome change to the Local Plan Publication Version and should provide a firm, yet flexible, basis for the identification and annual updating of a supply of specific deliverable sites sufficient to provide a rolling 5 years supply of housing against the total requirement.

51. The Table accords with the sustainable pattern of growth which is the foundation of the Local Plan, bringing greater certainty for all concerned with the delivery of housing and other development and its required infrastructure. Should it be practicable, however, to provide for more dwellings during 2010-2016 than the Table indicates to deal with the under-provision during 2009-11, and maybe consequently accept fewer dwellings during later parts of the plan period, there would be no good reason to resist. This approach should be encouraged, and would meet the requirement in the Framework for the identification and updating annually of a supply of specific deliverable sites sufficient to provide 5 years worth of housing against housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. The Local Plan makes no allowance for windfalls in the supply of housing land, but the Councils may wish to take into account those windfall sites which are coming forward and make a realistic allowance for them in the preparation of their Site Allocations DPDs. This would accord with the Framework, provided that there is compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply.

52. The Framework states that where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period), also to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. Table 9 in the SHLAA (September 2010) compares annual net completions in Preston with the RS annual requirement of 507 dwellings. No clear trend emerges in terms of over or under provision. In 2003/04 there was an under provision of 199 (308-507) dwellings, and with the net completion of only 5 dwellings in 2009/10, an under provision of as many as 502. In 2007/08 there was an over provision of 102 (609-507). The cumulative under supply from 2003/04 to 2009/10 was 423 dwellings. Completion details provided by Indigo (Housing Land Position at 31 March 2011) show an under provision during 2003/04 to 2010/11 of 803 dwellings.

53. This under provision in Preston should be made good. It equates to no more than about 54 dwellings during each year of the plan period. The annual provision during the last 9 years has varied rather than having been persistent, defined as *existing continuously in time: enduring*, (OED). It would therefore be better to treat the annual requirement as a minimum, thereby accommodating an additional 54 dwellings each year, instead of bringing forward a buffer of 20%. It is the Councils' intention to deal with additional buffers through the Site Allocations DPDs, and they will no doubt take account of the 2011/12 completions when they are to hand.

54. It is suggested that certain land in the 2 additional Strategic Locations, either with the benefit of planning permission or with the benefit of a good deal of preparatory work, be re-classified as Strategic Sites. Although much work has been done to demonstrate the sustainability credentials of both Locations, it would be premature at present to define them, or any parts of them, as Sites. It would serve to undermine consultation upon these broad areas as part of the preparation of the Site Allocations DPDs, thereby fettering their proper consideration. In any event, work on this next, more detailed stage in the preparation of Local Plans has continued apace despite the delays attending this Local Plan, and there is nothing in principle to prevent a planning application being made for land within a Strategic Location, as has been the case at Haydock Grange at North West Preston. The balance of advantage is with the identification of Strategic Locations as a precursor to the judicious definition of actual sites.
55. In his introduction to the Framework, the Minister for Planning, the Rt Hon Greg Clark MP, states that in the past people have been put off from getting involved because planning policy itself has become so elaborate and forbidding, the preserve of specialists rather than people in communities. Bearing in mind the views of Woodplumpton Parish Council and no doubt other local communities and people, the Councils should be encouraged to continue their good work in involving people in their areas to participate in plan making. It was good to have some local people and Parish Councils participating in the examination of this Local Plan, and their contributions have assisted me in coming to my conclusions about the soundness of the Local Plan.

Other Housing Policies

56. Policies 5 and 6 deal respectively with housing density and quality. They accord with the Government's encouragement for high quality housing that is well designed, built to a high standard and with layouts which make efficient and effective use of land. The evidence base, mainly the SHLAA, the SHMA and the Housing Viability Studies, is convincing about such matters as development viability, average household size, the ageing population, under-occupation, housing mix and householders aspirations and preferences. It is abundantly clear, for example, that the Councils are well aware of the ageing population in the City and Boroughs, a consideration which brings issues of health, mobility and dependence. These matters are better addressed in more detail in the determination of individual planning applications, as the Councils propose. Other considerations include safety, particularly where residential development takes place close to operational railway lines.

Conclusions

57. The amount of housing proposed, together with the policies which seek suitable densities and high quality design and other relevant policies, accord with the Government's policy, set out in the Framework, of delivering a sufficient amount and wide choice of high quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities. As a result, everybody should have the opportunity of living in a decent home which they can afford in a community where they want to live. In these respects, the Local Plan is sound.

Issue 4 – Whether the Local Plan is effective in meeting special housing needs, including affordable homes, accommodation for the elderly and for gypsies and travellers

Affordable Housing

58. Policy 7: Affordable Housing provides that open market housing with a capacity of 15 dwellings (0.5 ha or part thereof) will include affordable homes, but a lower threshold of 5 dwellings (0.15 ha or part thereof) will apply in rural areas, reflecting the usually smaller sites which are found therein. In the urban areas, the Councils will seek 30% affordability and at or near 35% in the rural areas. On Rural Exception Sites there will be a requirement of 100%. These provisions are helpfully modified and clarified by the Suggested Examination Hearing Changes which emphasise the importance of financial viability, site by site assessment and the need to seek and negotiate in the provision of affordable housing. The Policy, which now applies to affordable and special needs housing, accords with the Framework of setting policies for meeting the need for affordable homes on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock). Experience shows that these percentages are not dissimilar from those sought by local planning authorities elsewhere.
59. The evidence base includes a Housing Viability Assessment for each of the constituent Authorities. It is thorough and convincing. A spreadsheet-based toolkit for Central Lancashire is set out which enables economic viability to be tested on a site by site, scheme by scheme basis taking account of all development costs including contributions sought for items other than affordable homes. It shows that levels of economic viability vary across the plan area, but the Councils confirm that 30%/35% affordability has recently been achieved following negotiations with developers. They describe these levels as targets and accept that they will not always be achieved; nor, they say, will the estimated annual shortfall of 1,779 affordable homes be met. This is a realistic stance.
60. There is no doubt about the Councils' commitment to securing as many affordable homes as possible. Chorley Borough Council, for example, has benefited from Government initiatives with 84 assisted purchases in 2010-2011 and 53 during the previous year. Similar numbers are expected in the Borough in the near future despite a reduction in Government funding. Rightly, the Policy implies that each site is unique and that circumstances change over time. The targets are therefore qualified by the need to take account of such site and development considerations as financial viability and contributions to community services. The inclusion in the Local Plan of the 2 additional Strategic Locations should result in the provision of significantly more affordable homes. Depending upon the percentage of affordable homes on qualifying schemes, the PHRCs could deliver another 401-1,202 such homes, it being reasonable to suppose that the larger sites within the Strategic Locations will be the most viable places for affordable housing. These are further important factors in support of the PHRCs as a Main Modification.

61. The main points to bear in mind are that agreements concerning affordability should be sought not required, that the Policy is a platform for negotiations between Councils and interested parties and that economic viability, tenure split and the circumstances of the case are vital considerations in the determination of a planning application and the degree of affordability reasonably sought. The PHRCs suitably deal with these matters and render the Policy sound. It also provides a useful degree of certainty about the Councils' aspirations which is better than a purely individual site by site and case by case approach. In these respects, the flexibility of the Policy accords with the Framework in that it takes account of changing market conditions over time. There is a realistic prospect that the Local Plan will deliver a reasonable number of affordable homes during the plan period.

Special Needs

62. In acknowledging the ageing population, Local Plan paragraph 8.43 refers to its implications and to the analysis of the level of need for supported housing. These circumstances can constitute a special need which may or may not be met in affordable housing. Special needs come in many forms including the various elderly groups and they require a variety of responses. It would be better not to seek to list them or to hazard a guess about their possible land requirements. As with community services, such a list might be long and could still run the risk of omitting particular categories.
63. The Councils are right to regard any such special need as a material consideration to be taken into account in their determination of any planning applications, having been appraised of such matters as the need for and the particular circumstances of the proposal, its economic viability and the objective of improving the wellbeing of all. The Local Plan and the Councils' response on these matters go as far as they should in these respects.

Other Needs

64. The Local Plan notes that the Lancashire Gypsy and Traveller Accommodation Assessment found no proven need for additional pitches in Central Lancashire, but that there is a need in Preston generated by the existing traveller community. There is no convincing evidence to the contrary. Policy 8: Gypsy and Traveller and Travelling Showpeople Accommodation comprises relevant criteria and accords with national policy in the Framework that, where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless came forward. If pitches are needed at a local level, local authorities can identify specific sites through a separate DPD. This approach does not conflict with the Government's Planning Policy for Traveller Sites, and particularly its requirement for local planning authorities to work collaboratively and to plan for sites over a reasonable timescale. The Local Plan's approach is entirely reasonable.

Conclusion

65. Policy 7 as proposed to be changed, and Policy 8, together with their supporting texts, are effective, justified and accord with national policy. In particular, Policy 7 provides a firm, clear and certain basis for securing the maximum number of affordable homes and the flexibility to allow for exceptions where justified. It provides a good starting point for negotiations

and has a realistic chance of achieving the objective of meeting the needs of different groups in the community. The Local Plan is sound in these respects.

Issue 5 – Whether the Local Plan's approach to economic development and the protection of employment land is clearly articulated, sufficiently justified and in line with national policy

General Approach

66. Since the initial preparation of the Local Plan, the Chancellor of the Exchequer has published proposals to help rebuild Britain's economy, including a Plan for Growth, and on 23 March 2011 the written Ministerial Statement, Planning for Growth, was published. This sets out the Government's commitment to reforming the planning system so that it promotes sustainable growth and jobs. There is a pressing need to ensure that the planning system does everything it can to help secure a swift return to economic growth, and the Local Plan anticipates much of this initiative by acknowledging the considerable economic growth potential of Central Lancashire and by promoting long term sustainable economic growth of the right type, in the right locations and of generally the right amount.
67. Policy 9: Economic Growth and Employment sets out the employment land requirements and identifies sustainable locations where economic development will be concentrated. For the most part it will be closely related to residential and other development, thereby providing opportunities for sustainable travel patterns, including walking to work. A possible exception is Samlesbury, at some distance from large residential areas, but it makes sense to identify this location to provide for the expansion of BAE Systems and/or for similar or associated enterprises like advanced aerospace manufacturing. It accords with the policy in the Framework to plan positively for the location, promotion and expansion of clusters or networks of knowledge-driven, creative or high technology industries. These Policies complement others, particularly Policy 1 and Policy 11: Retail and Town Centre Uses and Business Based Tourism which are soundly based upon sustainability principles. Continued liaison with University, colleges, training agencies and local employers should improve skills and economic inclusion, as promoted by Policy 15: Skills and Economic Inclusion.
68. Policy 9 provides for the identification of 501 ha of land for employment development during 2009-2026. These figures are in the context of the 1,363 ha in RSS Policy W3 Table 6.1 for the 14 Lancashire Authorities' areas during 2005-2021. The RPB advised the Councils to update the RS figures, using 2008/09 data and project them to 2026, the end of the plan period. Using the same methodology as in Table 6.1, the Councils estimate an overall Lancashire requirement of 1,132 ha comprising supply (987 ha) + extra allocation (145 ha). To disaggregate this 145 ha extra allocation to each of the constituent authorities, the RPB suggested 4 alternative methods. It was understood that all the Lancashire Authorities were advised of these methods to inform the preparation of their own Local Plans, and the RS expects the Authorities and other partners to work together to agree the distribution of land within each sub-region, the RPB facilitating this approach (RS paragraph 6.12). The advantages and disadvantages of each method are convincingly explained in detail in the ELR Background Topic Paper (BTP) SD14. Owing to

such marked disadvantages as outdated (Scenarios 1a and 1b) and inconsistent (Scenario 2a) data, the Councils rightly chose Scenario 2b.

69. Scenario 2b is based on the requirement of each of the 3 Authorities providing the same percentage share of the Lancashire total as constituted their supply in 2008 (372 ha). Thus the Preston supply of 90.99 ha was 9.22% of the overall Lancashire supply in 2008 (987 ha). Comparative figures for South Ribble were 183.70 ha (18.61%) and for Chorley 97.46 ha (9.88%). On this basis, the amount of additional land expected from each Authority towards the Lancashire extra allocation of 145 ha was 13.37 ha (Preston), 26.99 ha (South Ribble) and 14.32 ha (Chorley), a total of 54 ha or so which would be 37% of the total Lancashire requirement. This approach may perpetuate an existing imbalance in Central Lancashire, a matter no doubt considered by the RPB, but as the plan area functions as one integrated local economy, travel to work area and single housing market area, any such disadvantage is not fatal to the methodology or its outcome.
70. Further work has been undertaken based upon the 2009 supply figures of 107 ha (Preston), 179 ha (South Ribble) and 91 ha (Chorley), a total of 377 ha. An allowance has been made for losses from employment to non-employment uses during 2009-2026, based upon average annual losses during the 5 years up to 2009. For this 17 year period, it is estimated that 11 ha will be lost in Preston, 35 ha in South Ribble and 24 ha in Chorley, a total of 70 ha. Continuing with the same percentages, the Councils estimate an additional requirement of 13 ha (Preston), 27 ha (South Ribble) and 14 ha (Chorley), again bringing the Central Lancashire total to 54 ha. Hence the 501 ha for which Policy 9 provides comprises 377 ha (2009 supply), 70 ha (allowance for losses) and 54 ha (additional provision).
71. To accord Policy 9 better with the plan period, the Councils calculate that during 2009/10 there was a take up rate of 7.23 ha in Preston, nil in South Ribble and 5.15 ha in Chorley, a total of approximately 12 ha. This helpfully updated figure has been deducted from the 501 ha in the Policy to the 489 ha (2010-2026) of the Suggested Examination Hearing Changes. Prediction is an inexact science, especially at a time of economic uncertainty. Reasonably, however, the Councils have adopted the methodology set out in the RS, updating the data so as to relate it better to the plan period. Owing to such considerations as the importance of such centres as Preston, Leyland and Chorley in Lancashire, the economic potential of Central Lancashire and the Government's emphasis on economic growth and employment, it is reasonable for the 3 Authorities to account for 37% or so of the estimated employment land requirement for Lancashire.
72. Policy 10: Employment Premises and Sites seeks the protection of these existing resources to ensure future sustainable economic growth during the plan period. It accords with the policy in the Framework to plan proactively to meet the development needs of business and support an economy fit for the 21st century. The Policy is firm, but sufficiently flexible in accepting that, provided certain criteria are met, some sites and/or premises may be suitable for re-use and/or redevelopment other than for Class B uses. This approach accords with the requirement in the Framework to avoid the long term protection of sites allocated for business use where there is no reasonable prospect of a site being used for that purpose.

73. Even so, new businesses often start in existing buildings on small sites where rents are relatively low and in locations where there is opportunity for employees to walk to work. Poor quality sites and premises may, therefore, have an economic value greater than their appearance might suggest. Some premises may have been held back in the hope of a more beneficial planning permission for housing, and the resistance of Lancashire County Council to the loss of employment land is noted. Instead of expecting the loss of as much as 70 ha on the basis of present trends, the Councils may wish to include no more than about half of it (35 ha) in their calculations. Any such additional modification would accord with the somewhat more rigorous stance introduced by the minor re-wording to the Policy of the Suggested Examination Hearing Changes and the need to protect suitable sites for new employment generating businesses. It would reduce the total to 454 ha, including existing supply. The Councils may wish to give this matter further consideration in the preparation of the Site Allocations DPDs. In so far as such an approach could be construed as seeking to achieve a strong, competitive economy, assisting the establishment of new businesses, it need not conflict with the Framework.
74. Policy 13: Rural Economy complements a number of policies, especially Policy 1. It strikes a balance between the need to protect the environment, including the intrinsic character and beauty of the countryside, and stimulating employment in District and Local Centres and encouraging the suitable conversion of farm and other buildings. It also supports rural based tourist attractions. Much, of course, will depend upon the particular circumstances of the proposals, but this and other relevant policies are a useful start in the determination of planning applications.
75. The evidence base is comprehensive, thorough and convincing. It includes the ELR, the BTP and the well-ordered Note for Inspector. The Councils have closely consulted the RPB which accepted *that the additional provision to 2026 figures generally complies with the approach undertaken in Table 6.1 of Policy W3 of the RS*. The Local Plan sets out a clear economic vision and strategy for Central Lancashire which positively and proactively encourages sustainable economic growth. It is effective, justified and accords with national policy, particularly those aimed at fostering economic growth and employment. In these respects it is sound.

Issue 6 – Whether the Local Plan convincingly sets out the role of Preston City Centre, suitably protecting and enhancing its vitality and viability without serious detriment to other town centres, and whether suitable provision for other centres is being made

Preston - Role, Capacity and Need

76. Policy 11: Retail and Town Centre Uses and Business Based Tourism sets out a 3-tier hierarchy of centres as a basis for a scale of development appropriate to each tier, but consistent with character. The scale should also take account of such considerations as capacity, need, competition and consumer choice. The key elements of the hierarchy are Preston City Centre, the Principal Town Centres of Chorley and Leyland and 7 District Centres, including those proposed at Buckshaw Village and Cottam. New economic growth and the development of main town centre uses will therefore be focused on existing

centres, delivering more sustainable patterns of development, reducing the need to travel especially by car and responding to climate change.

77. This approach accords with the Government's overarching objective of sustainable economic growth including the promotion of the vitality and viability of town and other centres. Complementary policies include Policy 3: Travel which seeks to improve pedestrian facilities and public transport services and Policy 16: Heritage Assets which seeks the protection and enhancement of these interests. Significantly, RS Policy W5 promotes retail investment where it would assist in the regeneration and economic growth of town and city centres. Such investment should, however, be consistent with the scale and function of the centre and should not undermine the vitality and viability of any other centre or result in the creation of unsustainable shopping patterns.
78. The recent (November 2010) Central Lancashire Retail and Leisure Review (CLRLR) is a thorough and comprehensive assessment of the future quantitative capacity and qualitative need for new retail and commercial leisure provision within the principal centres in Central Lancashire. It is part of the evidence base and informs the Local Plan's retail provisions. For the City Centre it identifies a significant requirement for new comparison retail floorspace to enhance the existing offer, to enable it better to perform its intended sub-regional role and to claw back trade from out-of-centre retail parks. It recognises existing quality deficiencies like limited consumer choice and competition and the lack of modern retail units, recent investment and family orientated leisure uses. It recommends an overriding qualitative need for new retail development. Site inspections confirm these conclusions.
79. The CLRLR Table 20b identifies a net capacity of comparison floorspace in Preston City Centre of 47,335 sq m, 57,498 sq m and 77,675 sq m by 2018, 2021 and 2026 respectively. There is no good reason to dispute these figures or the research which has led to them. Much of this capacity should be taken up by the approved Tithebarn redevelopment scheme (52,000 sq m net) within the TRA, although there is now some doubt about whether this particular scheme will proceed. Maybe it is still expected that a revised scheme will include a multiplex cinema and a range of bars and restaurants. The reporting Inspector noted that the "need" test no longer applied but that capacity was relevant to the consideration of scale and impact. In his view, the original proposal was of an appropriate scale and would have no significant impact on local centres or villages.
80. Whilst Blackburn and Blackpool had certain problems, he considered, their centres were not so weak that they could not cope with some impact, and those impacts could not be classed as *significantly adverse*. Any impact would be cushioned to some extent by future growth. The Secretary of State agreed, concluding that transportation issues were not the determining factor. Neither they, nor the associated conflict with the development plan and national policy was outweighed by compliance with the development plan and national policy in other respects and the clear and significant economic, environmental and regeneration benefits of the proposal.
81. Policy 9: Economic Growth and Employment acknowledges the TRA and this accords with the policy in the Framework of promoting competitive town

centre environments and setting out policies for the management and growth of centres over the plan period. It is envisaged that the remaining capacity will be met elsewhere in the TRA and in the mainly built-up 37 ha new CBD, further invigorating the City Centre, in line with the identification of Central Preston as a Strategic Location in Policy 1. The Framework refers to the need to retain and enhance existing markets. These can improve the vitality of a town centre, their bustle contributing much to character and attractiveness. Preston Market is no exception; it provides an enjoyable shopping experience and it is to be hoped that good provision will be made for it in any redevelopment scheme.

82. The Councils are rightly optimistic about the prospects for redevelopment during the plan period, referring to planning permissions, ongoing negotiations and the intentions of the University of Central Lancashire, and there is no convincing evidence to show that the additional comparison floorspace resulting from other redevelopment in the City Centre during the life of the plan will seriously harm town centres elsewhere.
83. The CLRLR clearly demonstrates that there is no overriding quantitative need to plan for additional convenience floorspace in the City Centre beyond that already committed.

Chorley, Leyland and District Centres

84. The CLRLR considers Chorley and Leyland town centres, providing evidence of future spending, capacities and growth. It advocates an appropriate scale of retail and town centre uses. The Local Plan takes this further with proposed environmental improvements, thereby promoting vitality and viability. Planning permission has been granted for 2 schemes in Chorley, indicating developer confidence in the town, while the regeneration of Leyland is a corporate priority for South Ribble Borough Council. Work was expected to start on an ASDA foodstore in 2012. A more modest, but appropriate, scale of development is proposed for the District Centres to serve local needs.

Other Matters

85. Policy 11 seeks to resist the further expansion of floorspace for retail and town centre uses at out-of-centre retail parks. RS Policy W5 includes a presumption against large scale extensions (more than 2,500 sq m) to these parks unless they are fully justified in line with the sequential approach set out in the now superseded PPS 6. The Councils confirm that they do not intend the Policy to conflict with this sequential approach by preventing as a matter of course any expansion or intensification of out-of-centre retail parks. Hence the minor re-wording of the Suggested Examination Hearing Change to the Policy of *Focusing main town centre uses in the defined town centres*.
86. Town and City Centre uses are likely to be affected by changing circumstances during the life of the plan, and special forms of trading including on-line, mail order and tele-shopping may have significant implications for the planning of centres and the amount of convenience and comparison floorspace required. The scale of growth envisaged, particularly in Preston, and the TRA and CBD proposals should provide sufficient choice and enough flexibility to accommodate sectors not anticipated in the Local Plan and allow a quick response to changes in economic and social circumstances.

Conclusion

87. Policies relating to City, Town and District Centres are founded on a robust and credible evidence base. They clearly set out their role in the hierarchy and serve to enhance their vitality and viability. There is no convincing evidence to demonstrate serious harm to any other centres. The Policies are justified, effective and consistent with national policy. In these respects, the Local Plan is sound.

Issue 7 – Whether the Local Plan provides sufficient protection, preservation and enhancement of the built and natural environment and introduces measures of sufficient force to mitigate any potentially adverse effects upon these interests

Main Policies for the Heritage Assets

88. Central Lancashire is rich in heritage assets with more than 1,000 Listed Buildings, 26 Conservation Areas, 17 Scheduled Ancient Monuments and 13 Registered Parks and Gardens. In Preston, the many Listed Buildings include the Grade 1 Harris Public Library, Museum and Art Gallery in monumental Greek revival style and the impressive Grade II Preston Railway Station with its red rose welcome to Lancashire. The Conservation Areas include Winckley Square and the Registered Parks and Gardens include Miller and Avenham Parks alongside the River Ribble in Preston. Policy 16: Heritage Assets provides the context for the protection and enhancement of these valued assets. Complementary policies include Policy 12: Culture and Entertainment Facilities which seeks to protect cultural assets and Policy 1 which seeks to harmonise development with local character and setting. Policy 11 seeks to ensure that retail and town centre uses will respect the character of a centre, including its special architectural and historic interest. These Policies accord with the Framework which recognises that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance.

Heritage Assets - the Commitment

89. Despite the current financial climate, the Councils continue to demonstrate their commitment to their historic assets. The City Council has promoted the refurbishment of the History Gallery at the Harris Public Library, Museum and Art Gallery with a £1,100,000 grant from the Heritage Lottery Fund (HLF). The Grade II War Memorial in the Market Place is the subject of a £840,000 bid to the HLF for its restoration. Three Listed Buildings in the TRA will be retained as part of the approved scheme. The Council is working in partnership with the private sector to regenerate the Winckley Square Conservation Area which, due to such features as its fashionable late Georgian red brick town houses and its prevailing air of gentility, is described on the information board as one of the finest squares in the North West. Works include a combination of building repairs and public realm improvements. The Council has made a bid to the HLF to support this initiative, and hopefully it will succeed.
90. A recent Article 4 Direction removes certain permitted development rights in the Fulwood Conservation Area to preserve or enhance its character or appearance. Avenham Park, Avenham Walk and Miller Park have benefited

from a major £7,000,000 programme of refurbishment funded by the City Council, the HLF and the NWRDA. Of special attraction is the restoration of the Japanese Garden, the planting of 160 new trees and 40,000 shrubs and plants and improvements to the footpaths.

91. South Ribble Borough Council has Appraisals and Management Plans in place for each of its 8 Conservation Areas. Of special note is its initiative to enhance the character and appearance of Fox Lane, in the Leyland Cross Conservation Area, providing money for the installation of traditional timber sash windows and the painting of doors and railings. The Grade II Worden Park, Leyland, was the subject of a comprehensive restoration programme during 1976-1983, but continued high quality maintenance ensures that this 59.5 ha (147 acre) park remains a valuable asset for the local community.
92. Chorley Borough Council has recently granted Listed Building consent and planning permission for enabling development to support the restoration of the Grade II* Bank Hall, removing it from English Heritage's "Heritage at Risk" register. Works are valued at £8,000,000, approximately half of which is regarded as enabling development works and as a subsidy by the Council. Five of the Conservation Areas in the Borough have recent appraisals and management proposals in place with a commitment to do the same for the remaining 4 Areas. The Grade II Astley Park, best described as truly stunning, has received a £2,800,000 HLF grant with part match funding from the Council, part in cash (£800,000) and part in kind. A bid, on similar terms, is likely to be made shortly in respect of the Grade II Rivington Gardens.
93. These policies provide a firm foundation for the protection and enhancement of Listed Buildings and Conservation Areas. With the Councils' demonstrated commitment and praiseworthy track record, there is no reason to doubt that these assets will continue to be enjoyed for their contribution to the quality of life for this and future generations. Heritage assets include battlefields, and the cross-swords symbol denoting part of the site of the Battle of Preston (1648) appears on the OS Map near Fulwood Barracks. Maybe, some day, a plaque or similar will commemorate nearby what is understood to have been an important Civil War engagement, but that is no more than a purely personal reflection.

Policies for Green Infrastructure and the Natural Environment

94. Policy 18: Green Infrastructure sets out intentions for the management and improvement of environmental resources. Its supporting text and Figure 16 refer to the Central Lancashire Green Belt. No change is proposed to it. There is no reason to do so, including to those of its parts where it is of limited extent, as between Clayton-le-Woods and Leyland. This particular part, between the M6 Motorway and Wigan Road, includes a significant amount of development, including at Moss Lane, Thorntrees Garage, Greenbank Farm and a nursery, but it has a prevailing openness which contrasts with the residential estates to the west and the safeguarded land which is subject to development proposals to the east. It should stay as Green Belt. And Local Plan and Framework policies for the Green Belt should continue to apply to all proposals for inappropriate development within it, so there is no need to distinguish particular types of inappropriate development, as for sites for gypsies and travellers.

95. Policy 19: Areas of Separation and Major Open Space is drafted to protect the identity and local distinctiveness of certain settlements and neighbourhoods by these 2 types of designation. The worthy purpose is to ensure that those places at greatest risk of merging will be protected from doing so. The Policy can be compared to Green Belt policy, although the construction of new buildings for, for example, agriculture and essential facilities for outdoor sport and outdoor recreation, which may be acceptable in a Green Belt, may not be acceptable in an Area of Separation or a Major Open Space. To that extent it would appear that Policy 19 may in practice be more restrictive than Green Belt policy.
96. One Area of Major Open Space to be designated within the Preston urban area is between Ingol/Tanterton and Greyfriars/Cadley. It extends essentially from the edge of the mainly built up area towards the City Centre. Public rights of way are limited, but its actual presence as overwhelmingly open land is of greater consequence in justifying its protection. A stroll over much of the land between these 4 settlements enables appreciation of its attractive, tranquil, open and often sylvan character, and this alone is convincing evidence upon which to base this part of the Policy.
97. The Inspector who reported to the Secretary of State in August 2011 concerning the appeal by Northern Trust for residential and associated development at the former Ingol Golf Course noted *the unique and integrated nature of the site and its surroundings and the role it plays in this part of Preston. It provides a visual and physical release from the surrounding built-up area. It acts as a unifying element to the surrounding community* (APP/N2345/A/11/2145837). The Secretary of State agreed with the Inspector's recommendation and dismissed the appeal, concluding amongst other things that there was *a shortfall of a deliverable 5-year supply of housing* and that *the overall integrity of the site, its character and its appearance would be greatly and unacceptably degraded by the proposed development*.
98. I respectfully associate myself with the Secretary of State's conclusions. Indeed, the role and value of this land would be emphasised, not diminished, as a result of substantial development at the Strategic Location at North West Preston. Policy 19 is well drafted, justified and effective. Any modification to it which encouraged residential or other built development in the open space between Ingol/Tanterton and Greyfriars/Cadley would be contradictory and undermine its praiseworthy purpose.
99. Other related matters like the quality of the landscape, the protection of natural resources and various other aspects of sustainability are suitably accommodated in such policies as Policy 20: Countryside Management and Access and Policy 21: Landscape Character Areas. Policy 22: Biodiversity and Geodiversity and Policy 31: Agricultural Land seek to protect various valuable features including a Ramsar Special Protection Area, a Site of Special Scientific Interest and the best and most versatile agricultural land. The Local Plan relies on a comprehensive Revised Habitat Regulations Assessment Screening Report (March 2011) approved by Natural England.

Flood Risk

100. The Local Plan includes detailed contents on water management and flood risk, as well as Policy 29: Water Management. The evidence base is convincing. It includes a Phase 1 Strategic Flood Risk Assessment, a Water Cycle Study and the result of discussions between the Councils and the Environment Agency and United Utilities. The documents were prepared on the basis of national policy in PPS 25, but there is no conflict with the Framework. Policy 29 (d) as proposed to be changed following consultation with the EA suitably relies on its *appraisal, management and reduction* approach for the consideration of development proposals.

Conclusion

101. These policies are effective, justified and accord with national policy. The Councils' record in things achieved, bids made and about to be made and consultations undertaken demonstrate beyond doubt their commitment to the protection and enhancement of the assets examined. The Local Plan is sound in these respects.

Assessment of Legal Compliance

102. My examination of the compliance of the Local Plan with the legal requirements is summarised in the table below. I conclude that the Local Plan meets them all. See over the page.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan as a Core Strategy is identified within the approved LDS March 2011 which sets out an expected adoption date of November 2011. Its content and timing are compliant with the LDS, but the expected adoption date has slipped, probably by 7 months or so, due to the PHRCs. This is not, however, fatal to the legal compliance of the plan.
Statements of Community Involvement (SCI) and relevant regulations	The 3 SCI's were adopted in 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed "Main Modification" (MM) ie the Proposed Housing Related Changes (PHRCs).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Revised Habitats Regulations AA Screening Report (March 2011) sets out why AA is not necessary.
National Policy	The Local Plan complies with national policy except where indicated and 2 Main Modifications are recommended.
Regional Strategy (RS)	The Local Plan is in general conformity with the R(S)S.
Sustainable Community Strategies (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

103. The Local Plan has a number of deficiencies in relation to soundness for the reasons set out above which means that I recommend that it not be adopted as submitted, in accordance with Section 20 (7A) of the Act. These deficiencies have been explored in the main issues set out above.

104. The Councils have requested that I recommend main modifications to make the Central Lancashire Publication Core Strategy Local Development Framework December 2010 sound and capable of being adopted. I conclude that with the recommended Main Modifications set out in the Appendix the Central Lancashire Publication Local Plan (Core Strategy) satisfies the requirements of Section 20 (5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Richard E Hollox

Inspector

This Report is accompanied by:

Appendix A Main Modification 1, the Proposed Housing Related Changes including Inspector's letters to the Councils dated 15 and 27 July 2012

Appendix B Main Modification 2, as follows:

Policy X – Presumption in favour of sustainable development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

b) specific policies in that Framework indicate that development should be restricted.

APPENDIX 12:

Benger Appeal Decision Ref. 3285458



Appeal Decision

Site visit made on 24 May 2022

by Jonathan Edwards BSc(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 08 June 2022

Appeal Ref: APP/Y3940/W/21/3285458

Land at Sutton Lane, Sutton Benger, Wiltshire SN15 4RR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Hills Homes Developments Limited against the decision of Wiltshire Council.
 - The application Ref 20/03487/FUL, dated 24 April 2020, was refused by notice dated 30 April 2021.
 - The development proposed is residential development of 21 dwellings with associated infrastructure, landscaping and construction of new access onto Sutton Lane.
-

Decision

1. The appeal is allowed and planning permission is granted for residential development of 21 dwellings with associated infrastructure, landscaping and construction of new access onto Sutton Lane at Land at Sutton Lane, Sutton Benger, Wiltshire SN15 4RR in accordance with the terms of the application, Ref 20/03487/FUL, dated 24 April 2020, subject to the conditions in the Schedule at the end of this decision.

Preliminary Matters

2. The appellant has submitted 3 signed unilateral undertakings (the UUs) pursuant to section 106 of the Act – the first dated 5 May 2022 and the others dated 18 May 2022. The initial UU is signed by all signatories. The later UU's are the same but signed by different signatories. All 3 UUs include similar planning obligations relating to the provision of affordable housing, as well as financial contributions towards off-site play and recreation provision, the village hall, waste and recycling bins, air quality monitoring services and the provision of places at secondary schools in Chippenham. The 5 May 2022 UU includes an additional obligation that requires a management company to be set up to maintain open areas that form part of the development. I have taken account of the UUs in my assessment.
3. Reference is made in the submissions to an emerging Sutton Benger Neighbourhood Plan. However, this is at an early stage towards adoption and so I have attached limited weight to its contents in my assessment.
4. As well as this appeal, I have also determined a separate appeal¹ for a development of up to 24 dwellings and associated infrastructure at a nearby site to the east of Church View (hereafter referred to as the Church View proposal). While each appeal has been considered as a separate entity, I have

¹ Appeal ref no APP/Y3940/W/22/3292118

taken account that I have allowed this other appeal as a material planning consideration in my assessment.

Main Issues

5. The main issues are (i) whether the development would be in a suitable location having regard to the policies of the development plan, the National Planning Policy Framework (the Framework) and accessibility to services, (ii) its effect on the character and appearance of the area, and (iii) the aforementioned planning obligations.

Reasons

Suitability of the location

6. Under Core Policy 10 of the Wiltshire Core Strategy 2015 (the CS), Sutton Benger is identified as a large village. CS Core Policy 1 defines large villages as those with a limited range of services and restricts development to that needed to help meet local housing needs. There is limited evidence that demonstrates any particular need for housing in Sutton Benger and indeed reference is made to various recent developments in the village. In the absence of such evidence, the development would be contrary to CS Core Policy 1.
7. Moreover, the site lies outside, albeit close to, the defined boundary for Sutton Benger. CS Core Policy 2 states that development outside settlement limits would not normally be permitted unless for one of the circumstances set out in paragraph 4.25 of the CS. None of these apply in this case and so in these regards the development would be contrary to CS Core Policy 2. Also, the proposal would not accord with policy H4 of the North Wiltshire Local Plan 2001 (LP) which allows only replacement dwellings or residences required in connection with a rural enterprise on sites outside settlements.
8. Paragraph 4.15 of the CS states that development at large villages will predominantly take the form of small housing schemes of less than 10 dwellings. However, paragraph 4.15 does not form part of any CS policy and the use of the word "predominantly" indicates that this is not a firm requirement. As such, the failure of the development to comply with the terms of paragraph 4.15 is afforded limited weight.
9. The Framework advises that housing in rural areas should be located where it will enhance or maintain the vitality of rural communities. Due to their proximity, it is probable that residents of the proposed housing would use the range of facilities in Sutton Benger which includes a primary school, village hall, recreation facilities, pubs, post office and doctors' surgery. As such, the development would help sustain the vitality of the village.
10. All the village facilities would be within a reasonable walking distance from the development. Also, new pavements are proposed on Sutton Lane to assist safe pedestrian movement between the development and Chestnut Road where the primary school, village hall, recreation ground and doctors' surgery are located. This proposed pavement would not lie within the appeal site but it would be part of the public highway and so it would be reasonable to impose a Grampian style condition to secure its provision.
11. The proposed pavement would not provide a complete link to Chestnut Road and there would be a gap where pedestrians would need to walk in the road.

Also, walkers from the development would need to cross Sutton Lane to access local facilities. However, from my observations the road is lightly trafficked with slow vehicle speeds. As such, the route to the village facilities would feel safe even where gaps in the pavement would require pedestrians to walk in the carriageway. Moreover, the footway would improve safety for walkers between existing residences on Sutton Lane and the rest of the village.

12. Furthermore, the development would be within a reasonable walking distance of local bus stops. These would provide occupiers of the dwellings with reasonable access to bus services that run on weekdays and on Saturdays. The number of buses is limited but even so the services would provide an opportunity to travel by public transport to Chippenham and to a wider range of facilities. Also, the development would be within a reasonable cycling distance from Chippenham.
13. Notwithstanding the above, it is highly likely that a significant proportion of trips to and from the development would be by car. In particular, this is likely to be the mode of travel to shops, higher order leisure facilities and work places. In these regards, the development would not reduce the need to travel by car and so it would not accord with CS Core Policies 60 and 61. However, the proposed extensions of roadside pavements would promote walking and consequently the use of local bus services. In these regards, the development would comply with the terms of the Framework. Also, I have taken into account that the opportunity to maximise sustainable transport solutions will vary between urban and rural areas, as emphasised in the Framework.
14. Having regard to its location outside the settlement boundary, the lack of evidence to show it would meet a local need and its scale, I find the proposed development would be contrary to the CS spatial strategy. Also, in light of the paucity of higher order facilities and places of employment within the village, it would not entirely reduce the need to travel by car. For these reasons, I conclude the development would not be in a suitable location having regard to CS Core Policies 1, 2, 10, 60 and 61 as well as LP policy H4. The harm caused in these respects is tempered by the scheme's accordance with the Framework's provisions on the location of rural housing and the potential for residents to walk to the facilities and public transport links in the village. The Council's refusal reasons also refer to CS Core Policy 48. This is irrelevant as the proposal would not be a type of development referred to in the policy.

Character and appearance

15. The site is a grassed field with hedgerow and trees on the boundaries to Sutton Lane and to the fields to the south and east. A residential cul de sac called Sutton Gardens and Sharplands lies to the north. Also, the site is next to allotments that lie to the south of properties that face onto Sharplands.
16. The site has a sense of the countryside due to the absence of buildings as well as the boundary vegetation. However, it is visually separated from the extensive tracts of fields to the south and east by trees and hedges. Moreover, its proximity to the houses on Sutton Gardens and Sharplands leads to an edge of village or semi-rural character.
17. The proposal would result in a more developed and domestic character to the site. Also, the creation of the proposed access would form a gap in the roadside hedgerow which to a minor degree would reduce the vegetated, visual qualities

- of the road. Even so, the development would have a close relationship to Sharplands and Sutton Gardens, even if it would not be directly adjacent to any existing residences. As such, the development would not be significantly out of keeping with its surroundings and it would not appear isolated from the village.
18. The new access and the few gaps in the roadside vegetation would allow views from the highway of the development. Such views would undermine the open countryside nature of the locality. Moreover, the proposal would be seen further along the road to the south when approaching the village. Currently from these viewpoints the houses in the adjacent cul de sac are already visible. As such, the proposal would have the effect of bringing the built up extent of the village slightly further southwards.
 19. The development would also be clearly seen from the allotments, Sharplands and Sutton Gardens. From these vantage points, the resulting encroachment of the village into the surrounding countryside would be more readily apparent. As well as the visual effect of new buildings and roads, the introduction of domestic activities as well as the coming and going of vehicles would diminish the tranquillity of the area. In addition, the development would lead to new light sources that would affect the night time scene and would be detrimental to the rural feel of the locality.
 20. The Council refers to other possible viewpoints of the development including public rights of way to the south, east and north as well as from the recreation ground in the village. Given the separation distances and intervening vegetation and buildings, the development would not be prominent from such vantage points. Where seen, it would be read with the nearby houses at Sharplands, Sutton Gardens and along Sutton Lane.
 21. Elements of the development would be near to the site boundaries but the buildings would be positioned so as to allow the retention of most of the boundary vegetation and the provision of additional planting. As such, the proposal would avoid a sharp and insensitive interface with the wider countryside. Nonetheless, it is likely the houses would have a visual influence on the adjacent fields.
 22. The village contains a number of residential cul de sacs and so the proposed development would follow a common layout form. The amount of proposed hardstanding would not be particularly excessive and the incorporation of plots with front gardens would ensure the development is not overly car dominated. Also, it would not appear uncharacteristically dense. The affordable housing would be similar to some of the open market units and so it would be a tenure blind scheme. In general terms, the development would be similar in style and appearance to the nearby Sharplands and Sutton Gardens.
 23. In summary, the proposal would significantly erode the rural aspects of the site. This effect would be noticeable to a limited degree from the road, adjoining fields and viewpoints further away. However, it would represent a marked visual change to the setting of the allotments and in views looking southwards from Sharplands and Sutton Gardens. The development would not appear isolated or out of keeping with its surroundings and it would be of an appropriate high quality design. Even so, it would represent an encroachment into open countryside, albeit a minor extension compared to the built up extent of the village as a whole. As such, the development would be harmful to the character and appearance of the area and in these regards it would not accord

with CS Core Policies 51 and 57. Amongst other things, these seek to protect landscape character and natural features.

Planning obligations

24. There is no dispute between the main parties that the aforementioned planning obligations are fair and reasonable. Also, it is agreed the planning obligations are necessary to address the Council's objections as set out in its 4th refusal reason. I find no reason to disagree with the parties on these matters.
25. The Council's refusal reason on planning obligations refers to highway improvement works. However, its appeal submissions indicate the construction of new pavements within the highway could be reasonably secured by a planning condition. No other highway improvement works are referred to and so I find no reason for a planning obligation that covers this issue.
26. The 5 May 2022 UU includes a planning obligation setting out specific requirements regarding the management of open space through a management company. This is not referred to as being necessary in the Council's submissions. The maintenance of planting that falls within the public parts of the development is needed to ensure its satisfactory appearance. However, in the absence of any clear explanation I am not persuaded that this needs to be carried out by a management company as specified under the terms of the UU. Therefore, I consider this planning obligation is unnecessary to make the development acceptable in planning terms. Instead, it is reasonable to impose a planning condition that covers the issue.
27. Unlike the initial UU dated 5 May 2022, the UUs dated 18 May 2022 are laid out and worded in a format preferred by the Council. The later UUs also include additional clauses that relate to actions and charges should the owner of the site fail to provide required notifications, registration of the UU and an indemnity. There is no evidence or reference to planning policy that supports the inclusion of such clauses but they have no effect on the planning obligations. Without any evidence to the contrary, I am satisfied the UUs are legally sound.
28. For the above reasons, I conclude that, apart from that which relates to a management company, the planning obligations are fair, reasonable and necessary and the UUs would be effective in securing the obligations. As such, the development would accord with CS Core Policies 3, 43, 45 and 52 and LP policy CF3.

Other considerations

29. Several other concerns have been raised. The appellant's transport statement demonstrates that the development would lead to only a modest increase in traffic. Even when taking into account the traffic generated by the Church View proposal and other schemes in the wider area, there is no substantive evidence to show the development would lead to highway capacity problems. The proposal would be served by appropriate vehicular and separate pedestrian accesses and it would not prejudice highway safety.
30. Information on drainage for the scheme has been accepted by the Council's drainage engineer and Wessex Water also raise no objections. As such, I am satisfied a planning condition could be reasonably imposed to ensure surface water is disposed of appropriately and without increasing flood risk elsewhere.

There is no firm evidence such as flood risk maps to show that the development would be at flood risk. The sewerage treatment site would be far enough away to avoid odour problems for future occupants.

31. The development would be set away from the boundary of Sutton Benger Conservation Area (CA) with intervening properties and vegetation. Due to this lack of intervisibility, the proposal would preserve the setting, character and appearance of the CA. Additional traffic as a result of the development would have no meaningful effect on the significance of any heritage assets.
32. There is no evidence to demonstrate that any features of wildlife importance would be harmed by the development and the Council accepts the appellant's claim that the scheme would enhance the site's biodiversity value. I find no reason to arrive at a different opinion on this matter.
33. It is suggested that the site includes grade 2 agricultural land which would be lost as a consequence of the development. However, it is an enclosed, small plot with no obvious purpose and so the development would cause no harm of any significance through the loss of agricultural land.
34. I note concerns that the proposal would lead to additional use of the village surgery and extra demand for places at the primary school. However, there is no firm evidence to show that the development on its own or with the Church View scheme would lead to unacceptable pressure on local health services. Also, the information provided by the Council indicates that the school has capacity to accommodate pupils from this and the Church View scheme. There is no reason for me to arrive at a different opinion on these matters.
35. The concerns raised fail to justify dismissing the appeal. As such, they do not affect my overall assessment.

Housing land supply and planning balance

36. For the reasons set out in respect of the first and second main issues, the proposal would not accord with development plan policies when read as a whole. It follows to consider whether other factors justify allowing the appeal contrary to the development plan.
37. The Framework requires local authorities to identify a supply of deliverable sites sufficient to provide a minimum of 5 years' worth of housing. With reference to the Annual Housing Monitoring Report April 2022 (AHMR), the Council states it can demonstrate 4.72 years of supply for the county as a whole. Also, it sets out the various actions taken to address the shortfall in housing supply. These include granting planning permissions for residential development sites in Sutton Benger, in the wider local housing market area and elsewhere in the county. It is suggested that housing delivery figures show the land supply position is improving.
38. The appellant contends that the AHMR overstates the amount of available housing land and suggests a figure of 4.57 years supply instead. Irrespective as to whether this case is accepted or not, the Council is currently unable to show the minimum 5 year supply. In such circumstances, paragraph 11 of the Framework states that relevant development plan policies which are most important for determining the appeal are deemed out-of-date. Planning permission should be granted unless the adverse effects of doing so would

- significantly and demonstrably outweigh the benefits when assessed against the Framework's policies.
39. Even if the 4.72 year figure is accepted, the proposal would make a meaningful contribution towards addressing the identified shortfall in housing land supply. Moreover, 8 of the proposed units would be affordable, so helping to ensure an appropriate mix of units to meet a variety of accommodation needs and demands. Given these factors and the scale of the development, I attach considerable weight to the scheme's benefits in terms of housing provision.
 40. In addition, the proposal would create construction jobs and it would be close enough to allow occupants to support village services. These economic benefits attract moderate weight. The planning obligations would address needs raised by occupiers of the development but enhancements from contributions towards sports pitches and courts and the village hall would also benefit the existing population. This attracts limited weight in support of the scheme.
 41. In terms of adverse effects, the Framework reiterates that the development plan is the starting point for decision-making. However, paragraph 11 advises that where the tilted balance applies, there may be justification to grant planning permission contrary to the development plan.
 42. The proposal would not accord with the CS spatial strategy and development plan policies on the location of housing. However, the weight to be attributed to this conflict is reduced as the development would accord with the Framework's aim to locate rural housing where it would maintain the vitality of communities. Also, in line with the Framework, the scheme would allow the potential for walking, cycling and public transport trips to some facilities, despite the reliance on the private car to access places of employment and higher order services. As such, I attach only moderate weight to the unsuitability of the development's location. In arriving at this view, I have had regard to the cumulative effects of previous housing developments allowed in the village as well as the effects of the Church View proposal.
 43. The scheme would go against the aim of the Framework to ensure development recognises the intrinsic character and beauty of the countryside. Given the particular effects of the scheme, the harm in these regards attracts moderate weight in my assessment.
 44. When considering all factors together, I find the adverse impacts of the proposal would not significantly and demonstrably outweigh its benefits when assessed against the Framework. As such, the presumption in favour of sustainable development at paragraph 11 of the Framework applies. In such circumstances, the Framework states planning permission should be granted.
 45. The scheme would conflict with development plan policies when read as a whole. However, for the reasons given above, its benefits and other considerations are of sufficient weight to justify granting planning permission contrary to the development plan.

Conditions

46. I have considered the conditions suggested by the Council, having regard to the tests in the Framework. Where appropriate, I have amended the wording for precision reasons and to avoid unnecessary pre-commencement conditions.

47. A condition setting out the approved plans is imposed for reasons of clarity and to ensure the development is carried out as proposed. A construction management plan is needed to avoid harm to the living conditions of nearby residents, to the environment and to highway safety. To protect and enhance the biodiversity of the site a condition is included that requires the development to be carried out in accordance with the appellant's ecological report. To protect trees, a similar condition is needed that refers to the submitted tree report.
48. A drainage condition is required to prevent flood risk and ensure surface water is disposed of appropriately. A condition is imposed regarding materials to be used in the construction of buildings as the level of detail provided is inadequate to ensure a satisfactory appearance. However, sufficient information on means of enclosure are shown on the approved drawings and so the suggested condition in this regard is not needed. Conditions requiring the approval, implementation and management of a landscape scheme are included as the schematic details before me are insufficient to ensure an acceptable effect on the character and appearance of the area.
49. In the interests of highway safety, conditions are included that relate to the access, parking and turning areas as well as visibility splays. To encourage sustainable means of travel, conditions regarding off-site pavements and cycle parking are imposed. A condition restricting the conversion of garages is needed to ensure sufficient parking space is provided. However, a condition preventing the installation of artificial lighting would be unreasonable given the residential nature of the scheme. Therefore, this condition is not imposed.

Conclusion

50. For the above reasons, I conclude that the appeal should succeed.

Jonathan Edwards

INSPECTOR

SCHEDULE OF CONDITIONS

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans: 16.096.001 Rev E; 16.096.101 A; 16.096.102 A; 16.096.103 A; 16.096.104 A; 16.096.105 A; 16.096.106 A; 16.096.107 A; 16.096.111 A; 16.096.113 A; 16.096.114 B; 16.096.116; 16.096.117; 16.096.118; 16.096.119; 16.096.120; 16.096.121; Typical Bike Store; DR-C-053 P03; DR-C-002-P04; DR-C-100-P07; 16.96.500 Rev H; 16.096.501.Rev.H; 18024-200-01.
- 3) The development hereby permitted shall not commence until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the following relevant measures:

- an introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location;
- a description of management responsibilities;
- a description of the construction programme;
- site working hours and a named person for residents to contact;
- detailed site logistics arrangements;
- details regarding parking, deliveries, and storage;
- details regarding dust and noise mitigation; and
- communication procedures with the local planning authority and local community regarding key construction issues – newsletters, fliers etc.

Where piling is required this must be continuous flight auger piling wherever practicable to minimise impacts. Stone crushing shall be limited to 1030 to 1530 Monday to Friday with no crushing at weekends or bank holidays.

There shall be no burning undertaken on site at any time. Construction hours shall be limited to 0800 to 1800 Monday to Friday, 0800 to 1300 on Saturdays and no working on Sundays or Bank Holidays. The development shall be carried out in accordance with the approved CEMP.

- 4) The development shall be carried out in strict accordance with the recommendations as set out in the supplemental preliminary ecological appraisal dated 11 November 2020 by Chalkhill Environmental Consultants.
- 5) The development shall be carried out in strict accordance with the provisions of the aboricultural impact assessment incorporating tree survey, tree protection plan and aboricultural method statement, dated 15 April 2020, by SJ Stephens Associates.
- 6) Apart from the construction of the access or the excavation of foundation trenches, no development hereby permitted shall commence until a scheme for the discharge of surface water (including surface water from the access and driveways), incorporating sustainable drainage details, has been submitted to and approved in writing by the local planning authority. The development shall not be first occupied until surface water drainage has been constructed in accordance with the approved scheme.
- 7) Prior to the commencement of construction works of any of the buildings hereby permitted, samples of the materials to be used for the external walls and roofs of the buildings shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.
- 8) Prior to the commencement of construction of any of the buildings hereby permitted, a scheme of hard and soft landscaping shall be submitted to and approved in writing by the local planning authority. The details shall include:-
 - location and current canopy spread of all existing trees and hedgerows on the land and full details of any to be retained;

- a detailed planting specification showing all plant species, supply and planting sizes and planting densities;
- finished levels and contours;
- all hard and soft surfacing materials;
- minor artefacts and structures (e.g. furniture, play equipment, refuse and other storage units, signs, lighting etc);
- proposed and existing functional services above and below ground (e.g. drainage, power, communications, cables, pipelines etc indicating lines, manholes, supports etc).

All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the development or the completion of the development whichever is the sooner. All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species. All hard landscaping shall be carried out in accordance with the approved details prior to the occupation of any part of the development.

- 9) No part of the development shall be first occupied until a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscape areas (other than small, privately owned, domestic gardens) has been submitted to and approved in writing by the local planning authority. The landscaped areas shall be managed in accordance with the approved details.
- 10) No part of the development shall be first occupied until the access, parking spaces and turning areas have been completed in accordance with the details shown on the approved plans. The areas shall be maintained for those purposes at all times thereafter.
- 11) No part of the development shall be first occupied until the visibility splays shown on the approved plans have been provided with no obstruction to visibility at or above a height of 1m above the nearside carriageway level. The visibility splays shall be maintained free of obstruction at all times thereafter.
- 12) No part of the development shall be first occupied until the cycle parking facilities shown on the approved plans have been provided in full and made available for use. The cycle parking facilities shall be retained for such uses thereafter.
- 13) No part of the development shall be first occupied until details of a new footway from the site along Sutton Lane have been submitted to and approved in writing by the local planning authority. No part of the development shall be occupied until a footway has been provided in accordance with the approved details.
- 14) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended by any Order revoking or re-enacting or amending that Order with or without modification), the garages hereby permitted shall not be converted to habitable accommodation.

APPENDIX 13:

Clifton Appeal Decision Ref. 3211229



Appeal Decision

Hearing held on 15 October 2019

Site visit carried out on the same day

by Mrs J A Vyse DipTP Dip PBM MRTPI

an Inspector appointed by the Secretary of State

Decision date: 13th December 2019

Appeal Ref: APP/P0240/W/18/3211229

Land off Broad Street, Clifton SG17 5RR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Planning Prospects Limited and Sheila Bowman and Nicola Yvonne Bass against Central Bedfordshire Council.
 - The application, No CB/18/01099/OUT, dated 15 March 2018, was refused by a notice dated 21 June 2018.
 - The development proposed comprises residential development of up to 80 dwellings (including 35% affordable housing) landscaping, public open space, surface water flood attenuation, vehicular access from Broad Street and associated ancillary works.
-

Decision

1. For the reasons that follow, the appeal is allowed and planning permission is granted for residential development of up to 80 dwellings (including 35% affordable housing) landscaping, public open space, surface water flood attenuation, vehicular access from Broad Street and associated ancillary works, on land off Broad Street, Clifton in accordance with the terms of the application, No CB/18/01099/OUT, dated 15 March 2018, subject to the conditions set out in the attached schedule.

Procedural Matters

2. This is an outline application with all matters other than access reserved for future consideration. The submitted plans include a location plan and a plan showing the proposed Broad Street access details. A Development Framework Plan was also submitted (Plan No 674A-30C) showing the areas proposed for housing, open space, landscaping etc and the site access. Whilst indicative, the appellant relies on this plan to a large extent, to illustrate how the scale of development proposed could be accommodated at the appeal site, notwithstanding that layout and landscaping are not for consideration at this time.
3. Whilst the second of the two reasons for refusal set out on the Council's Decision Notice relates to the absence of a completed legal agreement, a planning obligation by deed of undertaking was submitted in connection with the appeal. I deal with the provisions secured in more detail later on. An executed version of the undertaking was submitted shortly after the close of the Hearing with the agreement of the parties.¹
4. After the close of the Hearing, an appeal decision relating to a site at Park Farm, Westoning was drawn to my attention by the Council.² The appellant was

¹ Listed as Doc 5 below

² APP/P0240/W/18/3204513 Dismissed 21 October 2019 (Doc 6)

given the opportunity to submit views on that.

5. The emerging Local Plan is currently the subject of Examination. It was a matter of agreement between the parties, as set out in the Statement of Common Ground, that only limited weight can be afforded to the policies of that Plan at the present time.

Main Issue

6. The main issue in this case relates to the effect of the development proposed on the character and appearance of the area and on the setting and identity of Clifton.

Reasons for the Decision

Character and Appearance

7. The District's settlement hierarchy as set out in the Central Bedfordshire Core Strategy,³ focuses most new development in the larger settlements with the best range of services and access to public transport. The Ivel Valley, within which the appeal site lies, is identified by policy CS1 as a particular focus for development, creating a string of complementary settlements where new development improves their individual and combined sustainability. The Settlement Hierarchy, as expressed through this policy, also identifies Clifton as a Large Village, the Settlement Envelope for which is defined on the Proposals Map.
8. The 5.3 hectare (ha) appeal site lies adjacent to but outwith the eastern settlement edge of the village as currently defined in both the adopted and emerging development plan and thus lies within open countryside for the purposes of planning policy. Policy DM4 of the Core Strategy identifies the types of development that are generally appropriate within Settlement Envelopes, essentially discouraging development in the countryside other than limited garden extensions. In proposing new residential development in the countryside, there is conflict with policy DM4.
9. Together and among other things, Core Strategy policies CS16 and DM14 seek to conserve and enhance countryside character and local distinctiveness in accordance with the findings of the Mid Bedfordshire Landscape Character Assessment,⁴ resisting development that would have an unacceptable impact on the landscape quality of an area. Development in the Ivel Valley is required to provide landscape enhancement on or adjacent to the development site, or contribute towards landscape enhancement. Existing trees are to be protected, with an increase in tree cover promoted.
10. The area within which the appeal site lies is subject to a number of Landscape Character Assessments from national through to local level.⁵ In essence, it sits within an area of generally level lowland with some long range views over large scale open arable fields which contrast with the more intimate, small scale pastures along the course of the River Ivel (to the east of Henlow). Overall it is described as a fragmented landscape, with the wide views over the level arable fields sometimes interrupted by abrupt settlement edges, its landscape

³ Core Strategy and Development Management Policies DPD, adopted November 2009.

⁴ Following unitary reorganisation, the 2007 Landscape Character Assessment referred to by the policy was superseded by the 2015 Central Bedfordshire Landscape Character Assessment (2015 LCA).

⁵ The appeal site lies within National Character Area (NCA) 88: Bedfordshire and Cambridgeshire Claylands. At a more local level, it sits within the Upper Ivel Clay Valley (Type 4c) as defined by the Council's 2015 LCA.

character being largely determined by the presence of nucleated villages, such as Clifton and Henlow, surrounded by open fields.

11. The National Character Area Profile for NCA88 includes a number of Statements of Environmental Opportunity (SEOs). Examples of measures to secure SEO3 include the enhancement of green infrastructure for both biodiversity and recreation and enhancing the visual appearance of the urban edge of settlements through new woodland planting. Among other things, the stated Landscape Strategy for the Upper Ivel Valley as set out in the Council's 2015 LCA, is to create new features to enhance and strengthen the river valley character such as tree planting to screen harsh urban boundaries and increase biodiversity interest. In addition, the guidelines for new development in the 2015 LCA seek, among other things, to safeguard the rural character and qualities of the Ivel corridor by planting further woodlands to create a more rural edge to development on the margins of villages; encourage the creation of new wetlands to increase biodiversity interest and strengthen character; enhance landscape boundaries at exposed urban edges; and avoid the coalescence of towns and villages.
12. The appeal site is located on the northern side of Broad Street and comprises part of a larger, irregularly shaped arable field which has different crop growing areas within it. It contains no significant topographical features, although a row of early mature/semi mature trees within an unmanaged hedgerow extends part way into the site at its northern end.
13. Other than a roughly 25 metre wide strip running into the site off Broad Street alongside No 111 required to facilitate the proposed vehicular access, the southwestern site boundary is aligned with the rear boundaries of the Broad Street dwellings that back on to the site. The north-western site boundary follows the end of the rear gardens of six properties on this side of The Joint (a residential cul-de-sac off Broad Street) before stepping out to run roughly northwards alongside public footpath No 4 (FP4) for a distance of some 150 metres. Houses on Newis Crescent and Brickle Place back onto the opposite side of this section of the footpath, their short rear gardens enclosed largely by timber fencing. At a rough area of trees and shrubs on the site of a long disused tip, the site boundary returns in a north-easterly direction, extending some way into the open field on an arbitrary line following no marked feature on the ground, before then returning back onto Broad Street, again along an undefined line. At its north-eastern corner, the site boundaries project in an easterly direction creating a narrow finger across the open field, mainly to accommodate underground drainage connections. The eastern boundary of the larger field is defined by a strong row of Poplar trees running along the line of public footpath No 5 (FP5) and adjacent ditch, which join onto an area woodland at the junction of FPs 2, 4 and 5.
14. Neither the appeal site, nor the land that surrounds it, is subject to any national or local landscape designation. It was a matter of consensus between the parties in this regard, that this is not a valued landscape in the terms of paragraph 170a) of the National Planning Policy Framework (the Framework). I agree - the appeal site does not include specific attributes or landscape features which take it out of the ordinary, sufficient for it to amount to a 'valued landscape' as referred to by the Framework. That is not to say though, that it has no value. Indeed, the landscape here is clearly valued by local people.

15. The appeal site, and the larger field within which it sits is largely flat, although levels do drop away slightly to the northeast. The largely vegetated roadside field boundary along Broad Street generally limits views of the site from the south. However, views across the site are afforded from the length of FP5, which runs along the eastern boundary of the larger field; from FP4, which joins with the northern end of FP5; and from the western end of FP2, at its junction with FPs 4 and 5. In those views, against the backdrop of the existing dwellings on this edge of the village the development would, I consider, be seen in the context of and as part of the settlement.
16. In terms of the existing character and identity of Clifton, the appellant's Heritage Statement confirms that whilst historically, linear development extended the original village nucleus (now a conservation area) the character of the settlement has changed over the years, with significant development on Newis Crescent, Brickle Place and Miles Drive in the mid-1970s effecting a significant change to its setting. More recently, residential development has occurred to the east of the settlement on Stockbridge Close. I am mindful also that a scheme for up to 97 dwellings on Hitchin Lane on the southern side of the village has recently secured permission on appeal.⁶ It is clear therefore, that growth is a characteristic of the settlement. Although each time housing development has taken place on the edge of the village it would appear that fields have been lost, there has been no material change to the overall character of the village in its current form, or its identity as a nucleated settlement surrounded by fields. To my mind, the development proposed would be no different and would not be a complete departure from the existing settlement pattern. I find no harm to the identity and setting of Clifton in this regard.
17. The planning application was accompanied by a Landscape and Visual Impact Assessment (LVIA) supplemented at appeal by a Landscape Statement. Both documents assess the landscape here as being of medium value and of medium sensitivity.⁷ Although the Council generally concurs with that assessment in terms of the wider landscape, it ascribes the site itself a medium/high value on the basis that it is located in what it refers to as a highly constrained area of countryside between the villages of Clifton and Henlow that makes an important contribution to the sense of place of both settlements.
18. The appeal site lies at the western edge of an 'Important Gap' between Clifton and Henlow, as defined by saved policy CS21 of the Mid Bedfordshire Local Plan: First Review (December 2005). The policy resists development proposals within Important Gaps that would '*promote the visual or physical coalescence of nearby settlements.*' The policy is not recited in the related reason for refusal and there was no suggestion that it had been omitted in error (unlike other policies relied on by the Council) although at Council's evidence confirms that whilst not most important, it is a relevant policy.
19. Whilst CS21 is a spatial policy, rather than a landscape designation as such, the open landscape character here informs that policy. I am also aware that the Clifton Green Infrastructure Plan (March 2011) produced by the Parish Council alongside the District Council, includes the appeal site within an area for which the identified aspirations are to retain farmland to act as a buffer between Clifton and Henlow to conserve their own distinct characters (Area

⁶ Appeal ref APP/P0240/W/16/3154829 - Land off Hitchin Lane, Clifton (Allowed 17 February 2017)

⁷ In the terms of the Guidelines of Landscape and Visual Impact Assessment (Third Edition)

- 19c). Whilst the document does not form part of the development plan for the area, it does identify what is important to the local community.
20. Self-evidently, the development proposed would affect the landscape character of the appeal site itself, replacing part of a large scale agricultural field on the settlement edge with up to 80 dwellings. However, in terms of the landscape character of the wider area, any impact would be local. Whilst there would be some harm, particularly during construction and on completion, the landscape here is already materially influenced by the existing settlement edge, representative of the hard abrupt edges described in the 2015 LCA.
21. As indicated on the Development Framework Plan, the extent of the proposed built form (approximately 2.3 ha) is intended to be contained immediately to the rear of the housing on Broad Street, The Joint and Newis Crescent, extending no further east overall than the existing housing. The remaining 3 ha of the appeal site, wrapping around the northern and eastern edges of the proposed built form, is shown as comprising a substantial area of landscaping, including planting, public open space and a surface water attenuation basin. In my view, this aspect of the scheme ensures that development proposed would address and integrate the abrupt urban edge created by the exposed rear garden boundaries, with the new housing set within a framework of green infrastructure, landscape buffers and structural planting that would mature over time to create a much softer settlement edge as the guidelines in the various documents referred to above suggest should be achieved by taking advantage of any development that takes place. In this regard, I consider that not only would the landscaping and planting proposed assist in screening and providing a setting for the development itself but would, over time, also provide a welcome enhancement to the landscape character of the area in accordance with the stated environmental opportunities and guidelines for this landscape type. I agree therefore, with conclusions of the LVIA in this regard, that the effect on the landscape character of the wider area can be considered as minor beneficial in the long term. Accordingly, I find no conflict with Core Strategy policies CS16 and DM14, or the aspirations of the Green Infrastructure Plan.
22. The defined Important Gap between Clifton and Henlow comprises generally agricultural land that is fringed by built development at the settlement edges. Ribbon development at the southern end of the Gap, along Broad Street/ Clifton Road, reduces the Gap on the southern side of the road to between 135-185 metres. Along the northern side of the road the Gap is much wider, widening out further still behind the existing frontage developments. On Stockbridge Road, the Gap extends to some 310 metres towards its northern end. A minimum separation of some 575 metres would remain between the built up part of the appeal site and Henlow, which distance is significantly wider than the separation along the road frontages between the two settlements. In that overall context,⁸ whilst the scheme would introduce development into the Gap, this is not a constrained part of the Gap and the development proposed would not promote the visual or physical coalescence of the two settlements. I find no conflict therefore, with policy CS21. There would be no conflict either with the stated purpose of Settlement Envelopes, as set out in the supporting text to policy DM4, which confirms that the Settlement Envelopes also serve to prevent coalescence between settlements.

⁸ As shown on the plan on page 11 of the Design and Access Statement.

23. In terms of visual impact from public vantage points, there are two aspects to consider: views across the site to the landscape beyond and views back towards the settlement edge. In these regards, the highest level of change is likely to be experienced by the users of the public footpaths and those residents that back onto the site. However, when walking the footpaths as part of the accompanied site visit, although it is apparent that one is in the open countryside, the abrupt settlement edge of Clifton is also evident. The northern part of FP4, and the length of FP5, would be separated from the built element proposed by the landscaping area proposed that would wrap round the northern and eastern edges of the housing, with open undeveloped agricultural land remaining between the paths and the appeal site boundary. Whilst there would be a significant change in view during construction and on completion, I tend towards the conclusion of the LVIA that, as the proposed planting and landscaping matures, and with no physical or visual coalescence between the two settlements, the magnitude of that impact would reduce to low over time, with a minor adverse significance of effect.
24. The impacts would be greater for the 150 metre section of FP4 which passes along the urban edge of Clifton, with the appeal site immediately to the east, where there would be a loss of open views. However, that section is only a small part of the overall length of the footpath route.⁹ Whilst this short section of the route would have housing on both sides, that is no different from the southern section of the footpath which runs along The Joint. Moreover, the appellant's Landscape Statement confirms that the development would be set within a landscape corridor here, providing separation between the footpath and the proposed housing. The detail of that corridor, and thus its efficacy, is a matter that would be within the control of the Council at reserved matters stage were the appeal to succeed. All in all, whilst there would be a material change in views from this short section during the construction phase and on completion, as the proposed planting and landscaping matures, the significance of that effect for that short stretch would, in my view, reduce to moderate adverse over time.
25. The development would be seen from the rear of the existing houses that back onto and have views across the appeal site. However, it is well established that that in terms of private interests, there is no right to an open view. As such, any changes within the site need to be considered in terms of the residential amenity/living conditions of those residents. I have considered carefully whether local residents would be affected harmfully by the proposal such that their properties would be unpleasant places in which to live. Clearly there would be changed views for residents, with current views of fields becoming views or glimpses of housing, roads and associated open space. In my judgement however, subject to future design proposals over which the Council would have control, there would be no unacceptable impact on residential receptors in terms of their living conditions.
26. So, to conclude on this issue, inasmuch as the scheme involves development outwith the defined Settlement Envelope for Clifton, there would be some conflict with Core Strategy policy DM4. I find no conflict however, with that part of the intended purpose of the policy in preventing coalescence between settlements.

⁹ The appellant's Landscape Statement sets out that the total length of FP4 is some 670 metres.

27. I have also found that there would be no long term physical or visual coalescence between Clifton and Henlow and no conflict therefore, with saved policy CS21 of the Mid Bedfordshire Local Plan: First Review. I find no conflict either with policies CS16 and DM14 of the Core Strategy. On the contrary, I consider that there would be significant benefits in terms of landscape enhancement and a net gain in landscape features, including a softening of the currently hard and abrupt settlement edge here.
28. Policies CS14 and DM3 of the Core Strategy seek to secure high quality development through various means. There was some discussion as to whether these are relevant policies in terms of outline applications such as this. Even if they are relevant at this stage, I find no conflict since the scheme would, in my view, be appropriate for its setting in terms of the scale of development proposed and in that it provides for landscaping appropriate to the development and its setting, contributing to a sense of place.

Benefits of the scheme

29. Clifton is identified as a Tier 3 settlement in the settlement hierarchy for the area as set out in the Core Strategy, reflecting its good range of services and facilities. It also benefits from its close proximity to Shefford, a Minor Service Centre, and the site is well served by public transport with bus stops in both directions along Broad Street close to the site entrance. In proposing new development at Clifton, a benefit of the scheme is the provision of up to 80 new dwellings in an accessible location.
30. In addition, at least 35% of the dwellings would be affordable, in compliance with Core Strategy policy CS7. The Council suggested that the affordable housing provision should attract only limited weight on the basis that does no more than meet the policy requirement, with my attention drawn to two appeal decisions dating from early 2018. My reading of those, however, does not lead me to the same view as that of the Council. Although the provision in the Cranfield decision¹⁰ did no more than comply with the policy requirement, the Inspector noted that since policies exist to seek planning benefits, not just to avoid harms, the affordable housing was a benefit to be included in the balance. He did not ascribe any particular weight to that benefit. In the Meppershall decision,¹¹ whilst the Inspector noted that the affordable housing provision simply met the policy requirement, she nevertheless went on to afford significant weight to the social benefits of the proposal.
31. In the instant case, I am mindful that paragraph 11.4.2 of the submission version of the emerging plan refers to a 'stark depiction' of just how serious the affordability problem is in Central Bedfordshire. Against that background, despite doing no more than meeting the policy requirement, I am firmly of the view that the provision of 35% affordable homes on the appeal site, ie up to 28 dwellings, is a significant social benefit of the scheme that carries considerable weight.
32. Significant socio-economic benefits would also flow from the development, including a construction spend of some £9 million, generating 77 construction jobs over a three year build out period, as well as 86 indirect jobs in associated industries, with an additional £3.16 million of direct gross value added. In

¹⁰ APP/P0240/W/17/3181269 Mill Road, Cranfield

¹¹ APP/P0240/W/17/3175605 High Street, Meppershall

addition, future residents are expected to generate a total gross expenditure of over £2.5 million. I recognise that the benefits to the construction industry would be time limited and there is no suggestion that local facilities are struggling and would thus benefit significantly from increased patronage. Accordingly, whilst welcome, I therefore afford these benefits moderate weight overall.

33. As confirmed by the appellant's ecological appraisal, as part of a large arable field the site is currently of negligible to low intrinsic ecological value. There would be a considerable benefit to biodiversity therefore, as a consequence of the development scheme, given the 3 ha landscaped/planted area proposed that would wrap around the site, which would include structural planting, amenity grassland and meadow planting, a landscape focal feature and an attenuation basin. There would also be a substantial benefit in that it would address and integrate the existing abrupt urban edge in accordance with .
34. Improvements to elements of local community infrastructure and open space provision secured via the planning obligation (as set out below) would also benefit existing local residents. However, since the purpose of the obligations secured is primarily to mitigate harm arising from the development proposed, I am not persuaded that it is a consideration that attracts any more than limited weight.
35. Reference is made to income for the Council from the New Homes Bonus as a benefit. Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. However, New Homes Bonus payments recognise the efforts made by authorities to bring residential development forward. I am mindful, in this regard, that the planning guidance makes it clear that it would not be appropriate to make a decision based on the potential for a development to raise money for a local authority.¹² Accordingly, whilst the Bonus is a material planning consideration, it is not one to which I attach positive weight.
36. Increased Council tax receipts are also mentioned as a benefit. However, since the development would result in a corresponding increase in demand on local services etc, again that is not a consideration to which I attach positive weight.

Other Matters

37. The site would be served by a new T-junction on to Broad Street. Local residents expressed concerns in relation to the safety and free flow of traffic and pedestrian safety. However, the Highway Authority does not raise any objection subject to appropriate conditions. Broad Street has a footway on the northeast side, as well as street lighting. Although the footway would need to be increased to 2 metres in width between the site and the nearest bus stop, that is a matter that can be secured by condition. As a consequence of traffic speeds along Broad Street exceeding the 30 mph speed limit, a speed reduction scheme needs to be secured to ensure that the proposed access arrangement is safe. Again, that could be dealt with by condition. I am content in these regards, that the development proposed would not result in material harm in terms of vehicular and pedestrian safety. To my mind, the

¹² ID: 21b-011-20140612

speed reduction scheme would in fact be a benefit of the scheme, attracting at least moderate weight in the overall balance.

38. I was told of poor drainage within the site and of localised surface water flooding and note that Core Strategy policy CS13 seeks to ensure that proposals incorporate suitable drainage infrastructure. The appellant's flood risk assessment and drainage strategy confirms that the appeal site lies within flood zone 1, which areas are at the lowest probability of flooding. Whilst surface water could shed towards the site in extreme events, water from the slightly higher land to the west is likely to be intercepted by the highway drainage before reaching the site. Clearly development of the site would increase impermeable surfacing which, if not managed, could increase the risk of overland flows. The Council's sustainable drainage officers are content however, that this is a matter that can suitably be addressed through the use of appropriate conditions were the appeal to succeed. In the absence of any substantiated evidence to the contrary, I have no reason to disagree.
39. The development proposed would result in the loss of agricultural land. Although the officer's report suggests that it is not classified as best and most versatile agricultural land, ie grade 1, 2 or 3a (BMV), the Council's case at the Hearing, through the evidence of Ms Myers and Mr Hughes, was that it is. Local residents also suggest that it is BMV. No substantiated evidence was before me on this matter. However, even if the whole site is BMV, the loss of such land would, in the scheme of things, be relatively small and not significant.
40. In relation to concerns about effect on wildlife and biodiversity, the appeal site does not include any statutory or non-statutory designated site of nature conservation interest. In addition, I have already referred above to its negligible to low intrinsic ecological value. Those areas of greatest scope for interest, namely hedgerows and trees, would be retained and enhanced and, together with the proposed attenuation basin, would result in benefits in terms of wildlife and biodiversity. Whilst a single badger sett is recorded nearby, it is only the badgers themselves and their setts that are protected by law, neither of which would be directly affected by the development proposed. In any event, the new meadow and amenity grassland and structural planting proposed would, it seems to me, increase the quality of foraging opportunities for any local badger population, a further benefit of the proposal.
41. As noted above, the site lies close to the site of a long disused tip and concerns were expressed in relation to potential pollution. However, the Council's Environmental Health officer raised no objection in this regard, subject to appropriate conditions assess and mitigate any potential harm. No substantiated evidence was before me to indicate that that would not provide sufficient protection for future residents.
42. It was drawn to my attention that at least one local resident has a balcony area that overlooks the appeal site. As acknowledged above, views from there would change as a consequence of the development proposed. Concern was also expressed in relation to potential overlooking and loss of privacy. Matters relating to layout and detailed design would be for the Council to consider in the first instance were the appeal succeed. I have no reason to suppose, in this regard, that the dwellings proposed could not be positioned in such a way

as to ensure sufficient separation to avoid significant overlooking and material loss of privacy.

Planning Obligation

43. The appeal is accompanied by a planning obligation in the form of a unilateral undertaking. Subject to the usual contingencies, the undertaking sets out covenants that would be imposed on the owners in favour of the District Council. The Community Infrastructure Levy (CIL) Regulations 2010 and paragraph 56 of the Framework set a number of tests for planning obligations: they must be necessary to make the development acceptable in planning terms, be directly related to the development, and be fairly and reasonably related in scale and kind to the development.
44. *Education*: to accommodate the additional demand created by the proposed development, the undertaking secures a contribution towards the provision of early years, lower, middle and upper school places at local schools and/or a new school (Pix Brook Academy). As set out at paragraphs 5.105-5.125 of the proof of Mr Hughes, and his Appendix 14, the contribution is derived from a calculation based on pupil yield x the relevant DfE cost multiplier for each category.
45. *Healthcare*: the development is expected to generate around 192 additional patient registrations, the main impact in this regard being on the Shefford Medical Centre. The current premises are nearing capacity, with development both currently under construction and already committed likely to take it beyond capacity. I was advised that there is scope to expand the surgery although questions were raised as to the availability of doctors. To secure the required provision, a contribution of £738 per dwelling is provided for, based on an updated formula operated by the Bedfordshire Clinical Commissioning Group for NHS England.
46. *Waste/Recycling*: a contribution of £55 per dwelling is secured towards the provision of two x 240 litre bins and one x 23 litre food caddy for each of the proposed dwellings. The provision ensures that the bins used within the development are compatible with the collection vehicles used by the waste collection contractor and will encourage recycling and composting to help deliver sustainable development by driving waste management up the waste hierarchy.
47. *Children's play and outdoor sport*: a contribution of £687.50 per dwelling is secured towards the improvement of existing play areas in the vicinity of the appeal site, including the nearby Whiston Crescent Recreation Ground play area, plus a contribution of £287.31 per dwelling towards off-site outdoor sports improvements, including the provision of a floodlit Multi-use Games Area at the Recreation ground.
48. *Village Hall*: a contribution of £1645.81 per dwelling is secured towards necessary upgrades to Clifton Village Hall and the STMA community building in Shefford as identified in the Central Bedfordshire Leisure Strategy Village and Community Halls Audit and Assessment Report. The basis for the calculation is set out at Appendix 15 to the proof of Mr Hughes.

49. *Affordable Housing*: Core Strategy policy CS7 seeks a minimum 35% affordable housing provision. The provision secured meets that requirement and in so doing would help meet an identified pressing need.
50. *Open Space*: the obligation secures the provision, retention and ongoing management of sufficient on-site open space within the site to meet the needs of future occupiers, pursuant to the Council's Recreation and Open Space Strategy.
51. All the contributions and obligations referred to above are consistent with Core Strategy policies CS2 and CS3, which together seek to provide healthy and sustainable communities by securing contributions from any development expected to necessitate additional or improved infrastructure or exacerbate an existing deficiency. They are reasonably related in scale and kind to the needs generated by the proposed development and I am content that they meet the relevant tests.

Overall Planning Balance and Conclusions

52. I have found that the proposal would conflict with policy DM4. There was much discussion in this regard as to whether the policy is out of date. Numerous appeal decisions were drawn to my attention which deal with that in different ways. For the purposes of this appeal, I have treated the policy as being not out of date. That is not to say that I necessarily endorse that view, but I have adopted it in order to carry out the planning balance. As noted at the start, there is also disagreement between the parties as to whether the Council can demonstrate a robust five year supply of housing land. For the purposes of this appeal and the carrying out of the planning balance, I accept the Council's position that it can demonstrate a supply. Again, that is not to be taken as meaning that I agree necessarily, it is simply a pragmatic approach in the circumstances that prevail here.
53. In light of the forgoing, the so called 'tilted balance', as expressed through paragraph 11d) of the Framework, is not engaged. That leaves the appeal to be determined in accordance with the development plan unless material considerations indicate otherwise. The combined benefits of the scheme in this case are substantial. Even were I to treat the conflict with policy DM4 as meaning that there would be conflict with the development plan as a whole, I consider in this instance, having regard to the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, that those benefits amount to material considerations, sufficient in this case given the very site specific context of the scheme to outweigh the harm arising through the conflict with policy DM4 and the very limited harm in terms of character and appearance and the potential loss of BMV. In my view, the benefits in this case outweigh the identified harms such that there is no conflict with the Framework when assessed overall. After very careful consideration I conclude, on balance, that the scheme can be considered as sustainable development and that the appeal should succeed.
54. There is clearly strong local feeling about this proposal, as reflected by the volume of objections received and the articulate opposition demonstrated at the Hearing. I recognise therefore, that this decision will be disappointing for local residents. However, the views of local residents, very important though they are, must be balanced against other considerations. In coming to my conclusions on the issues that have been raised, I have taken full and careful

account of all the representations that have been made, which I have balanced against the provisions of the development plan and the National Planning Policy Framework. For the reasons set out above however, the balance of considerations in this case lead me to conclude, overall, that the appeal should succeed.

Conditions

55. Possible conditions were discussed in detail at the Hearing on a without prejudice basis in the light of the related advice in both the Framework and the Government's Planning Practice Guidance. The conditions and wording set out in the attached schedule reflect that discussion and are based on the wording in Doc 7 listed below.
56. Conditions 1, 2 and 3 in the attached schedule relate to the submission of reserved matters and the commencement of development. To provide certainty, it is necessary to identify the plans to which the decision relates, but only insofar as they relate to the matter of access which is not reserved for subsequent approval. (4) Whilst all matters other than access are reserved for further approval, it is necessary for the outline permission to define the maximum capacity of development. (5)
57. In the interest of protecting the established character and appearance of the area and the role and function of the Important Gap, it is necessary to ensure that development of the site is in general accordance with the principles set out in Development Framework Plan (No 674A-30C) and the Design and Access Statement. (6) The wording originally suggested by the Council included reference to a number of details that would be the subject of the reserved matters applications and so are unnecessary at this point. The amended wording that I have used reflects the related discussion.
58. Any pedestrian access additional the arrangements shown on the approved plans shall not be constructed other than in accordance with details to be submitted to and approved by the local planning authority to ensure that it is constructed to a sufficiently high quality for the intended purpose and in appropriate materials, in accordance with Core strategy policy DM3. (7) Since the scheme is not dependant on the provision of any such, it is not necessary to secure provision prior to first occupation of any dwelling.
59. Conditions 8-13 are necessarily worded as pre-commencement conditions.
60. Details of proposed ground levels and proposed finished floor levels are necessary in the interest of visual amenity and to protect the outlook and privacy of adjoining occupiers. (8) In order to avoid pollution and to prevent increased risk from flooding, it is necessary to secure details of a sustainable surface water drainage scheme, together with details for ongoing management which are essential to ensure that the scheme continues to perform as intended, in accordance with Core Strategy policy CS13. (9) In order to minimise disruption during construction for local residents and those travelling through the area in the interest of highway safety and to protect the environment, condition 10 secures a Construction Environmental Management Plan. I have deleted the suggested requirement for monitoring and review of the construction process which is unnecessary given the requirement for a consultation and complaints management procedure to be agreed.

61. An Ecological Enhancement Strategy is necessary in order ensure the protection and enhancement of biodiversity and nature conservation interests, in accordance with policy CS18 of the Core Strategy. In the absence of any indication that the appellant's Ecological Assessment and required mitigation and enhancement measures set out therein is deficient in some way, there is no need to secure the suggested review of site potential and constraints. (11)
62. The appellant's Heritage Statement identifies low potential for archaeological remains to be encountered on the site, which does not preclude its development. A condition is required though to allow for any historical and archaeological potential that is uncovered to be recorded during the construction process, in accordance with Core Strategy policy CS15. (12)
63. Pursuant to policies DM1 and DM2 of the Core Strategy, it is necessary to require a proportion of energy sources to be renewable or low carbon and for water efficiency measures to be provided. (13)
64. Conditions 14-17 are necessarily to be complied with prior to first occupation of any dwelling. Conditions 14 and 15 are required in the interest of highway and pedestrian safety in accordance with policies CS4 and DM3. Condition 16 is necessary to encourage reduced reliance on the private car by promoting use of public transport and sustainable modes of transport in accordance with policy DM9. Condition 17 requires the provision of fire hydrants in order to ensure that adequate water infrastructure is available on site for the local fire service to access and tackle any property fire.
65. Given the proximity of the site to a long disused tip, it is necessary to ensure that any site contamination, or the potential for such, is detected and remediated accordingly and that any risks from contamination are properly dealt with to protect the health of future occupiers and to prevent pollution of the environment. (18)
66. A condition relating to any external lighting is necessary in the interest of visual amenity and to mitigate disturbance to wildlife, in accordance with policy CS14. (19)

Jennifer A Vyse
INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Christian Hawley, of Counsel	Instructed by Planning Prospects
Jason Tait	Director, Planning Prospects
BA(Hons) DipTP MRTPI	
Chris Dodds	Associate Director, Planning Prospects
BA(Hons) MA MRTPI	
Nichola Jacob	Partner, Randall Thorp
BA(Hons) MLA CMLI	
Tom Baker	Associate Director, Savills
MSc MRTPI	

FOR THE LOCAL PLANNING AUTHORITY:

Alexander Booth, of Queen's Counsel	
Phillip Hughes	Principal, PHD Chartered Town Planners
BA(Hons) MRTPI	
Jonathan Lee	Opinion Research Services
BSc MCI LARIA	
Julia Scott*	Landscape officer with Central Bedfordshire Council
BA CMLI	

*Mrs Scott spoke to the written statement of Alison Myers, submitted as part of the Council's evidence.

INTERESTED PERSONS:

Mrs Mary Walsh	Planning Volunteer and Trustee, Campaign For Rural England
David Lawson	Local resident
John Hutchins	Local resident
Catherine Routh	Local resident
Simon Fish	Local resident
Mrs Sadler	Local resident
Karen Hicks	Local resident
Brian Walker	Local resident
Brian Hogarth	Local resident
Trevor Brown	Local resident
Barry Livsey	Local resident
Clive Furr	Local resident
Mrs Herbert	Local resident
Gillian Evans	Local resident
Malcolm Kingsbury	Local resident
Ms Wischhusen	Local resident
Linda Harrison	Local resident
John English	Local resident
Bob Smith	Local resident

DOCUMENTS HANDED UP DURING THE HEARING

- Doc 1 Team sheet for the appellant
- Doc 2a Letter to the Council from the Local Plan Inspectors dated 30 September 2019
- Doc 2b Council's response dated 14 October 2019
- Doc 3 Natural England Technical Information Note TIN049 (Dec 2012) and an extract (page 35) of the Government's publication 'A Green Future: Our 25 Year Plan to Improve the Environment' (2018) – handed up by Mrs Walsh
- Doc 4 Written comments of Clifton residents (handed up by the Parish Council)

DOCUMENTS SUBMITTED AFTER THE HEARING

- Doc 5 Executed Undertaking
- Doc 6 Appeal Decision Park Farm, Westoning (APP/P0240/W/18/3204513)
- Doc 7 Revised conditions schedule reflecting related discussion at the Hearing

Schedule of Conditions
Appeal APP/P0240/W/18/3211229
Land off Broad Street, Clifton

Reserved Matters

- 1) Details of the appearance, landscaping, layout and scale (hereinafter called 'the reserved matters') shall be submitted to and approved in writing by the local planning authority before any development begins. Development shall be carried out in accordance with the approved details.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than two years from the date of this permission.
- 3) The development hereby permitted shall begin no later than one year from the date of approval of the last of the reserved matters to be approved.

Plans

- 4) The development hereby permitted shall be carried out in accordance with the details shown on Proposed Access Plan No ITM13310-SK-004c, but only insofar as it relates to access to the site.

Development Parameters

- 5) No more than 80 dwellings shall be constructed on the site.
- 6) All reserved matters shall be in general accordance with the principles for the development of the site as set out on the Development Framework Plan No 674A-30C and in the Design and Access Statement, with development to be carried out in accordance with the approved details.

Access

- 7) Other than as shown on Plan No ITM13310-SK-004c, no pedestrian access to the site shall be formed, created or provided other than in accordance with details that shall previously have been submitted to and approved in writing by the local planning authority.

Pre-Commencement Conditions

- 8) No development shall take place, including works of site clearance, unless and until details of the proposed ground levels within the site and finished floor levels of the dwellings hereby permitted, relative to an existing fixed datum, have been submitted to and agreed in writing by the local planning authority. Development is to be carried out in accordance with the approved details.
- 9) No development shall take place, including works of site clearance, unless and until a sustainable drainage scheme for the site based on the agreed Flood Risk Assessment and Drainage Strategy (12 January 2018) and an assessment of the hydrological and hydrogeological context of the site, has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented and thereafter managed in accordance with the approved details. The submitted scheme shall:
 - i) provide information about the extent of impermeable area, peak flow rate and storage requirement, with full calculations and methodology;
 - ii) include provision of attenuation for the 1 in 100 year event (+ 40% climate change) and demonstrate that the surface water runoff generated during rainfall events up to and including the 1 in 100 years rainfall event (plus climate change) will not exceed the run-off from the undeveloped site following the corresponding rainfall event;

- iii) include a timetable for implementation of the scheme, including any phasing; and,
 - iv) provide a management and maintenance plan for the scheme for the lifetime of the development, which shall include the arrangements for adoption of the scheme by any public authority or statutory undertaker, and any other arrangements to secure the operation of the scheme throughout its lifetime.
- 10) No development shall take place, including works of site clearance, unless and until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. Development shall thereafter be carried out in full accordance with the approved CEMP which shall remain in force for the construction period. The CEMP shall include, but is not confined to, details of:
- the hours during which construction work, including works of site clearance, and deliveries to/from the site can take place;
 - construction traffic routes and points of access/egress to be used by construction vehicles;
 - site management arrangements including on-site storage of materials, plant and machinery; temporary offices, contractors compounds and other facilities; on-site parking and turning provision for site operatives, visitors and construction vehicles; and provision for the loading/unloading of plant and materials within the site;
 - on-site wheel cleaning facilities;
 - dust mitigation and suppression measures;
 - a timetable to show phasing of construction activities to avoid periods of the year when sensitive wildlife could be harmed;
 - protection measures for all retained trees and landscaping, including details of protective fencing and its position relative to all retained trees and hedgerow;
 - a construction waste management plan that identifies the main waste materials expected to be generated by the development during construction, including vegetation, together with measures for dealing with such materials so as to minimise waste and to maximise re-use, recycling;
 - the procedure for consultation and complaint management with local business and neighbours.
- 11) No development shall take place, including works of site clearance, unless and until an Ecological Enhancement Strategy (EES) has been submitted to and approved in writing by the local planning authority. Development shall thereafter be carried out in full accordance with the approved EES, with all features retained thereafter. The EES shall include, but is not confined to the following:
- details of the purpose of and conservation objectives for the development hereby permitted, informed by a review of the ecological assessment;
 - detailed design(s) and/or working method(s) to achieve the agreed conservation objectives;
 - the extent and location/area of proposed works on appropriately scaled plans, including type and source of materials to be used where appropriate;

- a timetable for implementation;
 - persons responsible for implementing the works;
 - details of initial aftercare and long-term maintenance and management.
- 12) No development shall take place, including works of site clearance, unless and until a written scheme of archaeological investigation and resource management has been submitted to and approved in writing by the local planning authority. Development shall be carried out only in accordance with the approved scheme, which shall include, but is not confined to:
- i) an assessment of significance based on a staged approach;
 - ii) the programme and methodology of site investigation and recording;
 - iii) a programme for post investigation assessment;
 - iv) provision for analysis of the site investigation and recording;
 - v) provision for publication and dissemination of the analysis and records of the site investigation;
 - vi) provision to be made for archive deposition of the analysis and records of the site investigation;
 - vii) nomination of a competent person or persons/organisation to undertake the works set out within the written scheme of investigation.
- 13) Before commencement of any above ground works associated with the construction of any dwelling, a scheme of measures to source 10% of the energy demand for the development from renewable or low carbon sources, and to ensure that the development achieves a water efficiency standard of 110 litres per person per day (105 litres for internal use plus 5 litres for external use) shall be submitted to and approved in writing by the local planning authority. Development shall be implemented in accordance with the approved details and no dwelling shall be occupied unless and until the approved measures for it are in place and operational.

Pre-Occupation Conditions

- 14) No dwelling shall be occupied until the junction of the vehicular access with Broad Street, including pedestrian access points and visibility splays of 2.4 x 90 metres, has been constructed in accordance with the details shown on drawing No ITM13310-SK-004c. Thereafter, the visibility splays shall be kept permanently clear of any obstruction to visibility.
- 15) No dwelling shall be occupied unless and until the footway along the site frontage onto Broad Street has been increased to 2 metres in width and a traffic calming scheme along Broad Street has been implemented, all in accordance with details that shall previously have been submitted to and approved in writing by the local planning authority.
- 16) No dwelling shall be occupied unless and until an updated residential travel plan which has previously been submitted to and approved in writing by the local planning authority, has been implemented in accordance with the approved details. The travel plan shall include, but is not confined to, details of:
- predicted travel to and from the site and targets to reduce car use;
 - existing and proposed transport links, including links to pedestrian, cycle and public transport networks;
 - measures to minimise private car use and facilitate walking, cycling and use of public transport;

- a timetable for implementation of the agreed measures designed to promote travel choice;
 - provision for monitoring, reviewing and updating the travel plan annually for a period of five years;
 - marketing and publicity for sustainable modes of transport to include site specific welcome packs. The welcome packs are to include:
 - walking, cycling, public transport routes to/from/within the site
 - site specific travel and transport information, including copies of relevant bus and rail timetables
 - travel vouchers incentives
 - details of the appointment of a travel plan co-ordinator
- 17) No dwelling shall be occupied until a fire hydrant serving that property has been provided in accordance with details that shall previously have been submitted to and approved in writing by the local planning authority.

Contamination

- 18) Any contamination found during the course of development not previously identified shall be reported immediately to the local planning authority. Development on the affected part of the site shall be suspended until an investigation strategy and risk assessment and, where necessary, a remediation strategy and verification plan dealing with how the unsuspected contamination is to be dealt with, has been submitted to and approved in writing by the local planning authority. No dwelling on that part of the site shall be occupied until the measures identified in the approved remediation strategy and verification plan have been completed, and a verification report demonstrating completion of the approved remediation works and the effectiveness of the remediation has been submitted to and approved in writing by the local planning authority.

Lighting

- 19) No external lighting (excluding that in residential curtilages relating to domestic properties) shall be installed other than in accordance with details that have previously been submitted to and approved in writing by the local planning authority.

-----END OF SCHEDULE-----

APPENDIX 14:

06/2023/0030 – Planning Statement

PLANNINGSTATEMENT

JANUARY 2023

www.njlconsulting.co.uk

Signing off Sheet

Client: Hollins Strategic Land
Project: Land West of Garstang Lane, Broughton
Document: Planning Statement
Date: January 2023
Ref: 2022-031

Stage	Prepared by	Checked by	Date	Signed
Draft	Rachel White	Mark Saunders	December 2022	

Final

Authorised for and on behalf NJL Consulting

Nick Lee
Managing Director

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

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1. Executive Summary

1.1 This Planning Statement is prepared on behalf of Hollins Strategic Land to support the revised submission for development on land West of Garstang Road, Broughton.

1.2 The previous application was refused by the Council in January 2022. This application constitutes a re-submission under the 'free go'. The application was refused on the following grounds;

The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood Development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.

1.3 Despite the Council refusing the scheme, there were a number of areas which were agreed in principle through the determination of the previous application and are set out in the officer report which remains a material consideration for this application. These were:

- The proposal would have no impact on the strategic area of separation
- The proposals would not harm the surrounding landscape character
- There would be no harm to heritage assets arising from the proposals
- The surrounding highways network has capacity to accommodate the proposals and the proposed access arrangements are acceptable in principle
- The landscaping scheme would promote sufficient buffer zones and offsetting to protect the surrounding landscape areas
- A biodiversity net gain of over 33% could be achieved on site

1.4 These technical matters form the basis of the revised submission. The amendments to the scheme relate solely to the change in tenure proposed as part of the residential development. as such, the revised application comprises the introduction of homes for the over 55's and self-build plots.

1.5 The application seeks to respond to the reason for refusal issued by the Council and sets out the following arguments:

1. Broughton as a settlement has changed considerably since the adoption of the Development Plan. It now, more than ever, represents a sustainable location for growth and this has been confirmed by the Inspector and the Council themselves.

2. Whilst Broughton is at the lower end of the settlement hierarchy (in the adopted Local Plan) as set out in point 1, it still constitutes an appropriate location for growth. Furthermore, other settlements within the same classification have undergone considerable growth and expansion over the plan period suggesting that the hierarchy does not reflect the current situation.
 3. The revised settlement hierarchy outlined in the Emerging Local Plan takes account of the changes in Broughton and re-classifies it as a 'Local or Rural Centre'.
 4. The growth experienced within Broughton has overtaken all other settlements studied, suggesting that the settlement better represents a higher order settlement.
 5. The proposed development would not have any impact on the area of separation, or the open countryside as agreed by the Council and statutory consultees.
 6. Using the Neighbourhood Plan narrative, the site would follow the same logic that was used by the Parish to allocate sites for development given its minimal impact on the area of separation and the 'rounding off' of the settlement boundary.
 7. Notwithstanding the allocation of the site under Policy 1 of the Core Strategy, there are limited opportunities for development where it responds to an identified need.
 8. The proposed development has been amended to incorporate specific accommodation types which respond to the localised need for affordable rented products, housing for the over 55's and self-build plots.
- 1.6 On the basis of the above, it is our view that the proposed development responds intrinsically to an identified local need by providing affordable homes, self-build plots and over 55's accommodation.
- 1.7 The proposed development would also commit to providing accessible and adaptable dwellings in line with emerging standards, and would assist in accommodating for residential need for specific population groups.
- 1.8 The proposed development, whilst accommodating growth in a lower order settlement, would not result in a material change in the character of Broughton, and would allow it to continue to function as a 'nucleated' settlement. Furthermore, this limited development would promote the vitality and sustainability of Broughton as a rural settlement which would accord with the aspirations of the NPPF.
- 1.9 Overall, the content of the proposed development present significant benefits which should outweigh the perceived harm to the incompliance with the settlement hierarchy. Conflict with policy, being outside the settlement boundary, does not necessarily mean that significant planning harms arise particularly when the settlement boundaries have been overcome with events.

2. Introduction

2.1 This planning statement is prepared on behalf of Hollins Strategic Land (the applicant) to support a revised submission for development on land west of Garstang Road, Broughton (the site).

2.2 This application supports the submission of an Outline Planning Application to Preston City Council for the proposed works:

Outline planning application seeking approval for access only for residential development for up to 51 no. dwellings (including 40% affordable housing, First Homes, accommodation for over 55's, accessible and adaptable wheelchair provision and self-build plots) with associated works (all other matters reserved)

2.3 The application follows a refusal by Preston City Council in January 2022 (reference 06/2021/1104). The revised application is submitted within the 12 months following the initial decision, therefore qualifying for the 'free go'¹ (as established under paragraph 40 of the Planning Application Fees guidance). A full overview of the refused application, and how the scheme has been amended is provided later through this report.

2.4 This report sets out the proposed development, assesses it against the relevant planning policies, guidance and material considerations and confirms acceptability of the scheme.

2.5 The report is structured as follows:

- **Section 2** gives an overview of the site and surrounding areas
- **Section 3** Outlines the planning history
- **Section 4** sets out the Development Plan
- **Section 5** gives an overview of the changing nature of Broughton
- **Section 6** details the revised proposals
- **Section 7** sets out the case for development
- **Section 8** provides the technical assessment
- **Section 9** concludes the report

¹ <https://www.gov.uk/guidance/fees-for-planning-applications>

Supporting Documents

2.6 This application is supported by the following drawings:

Drawing	Consultant
Site Location Plan	Hollins Strategic Land
Proposed Access Plan	Stantec
Indicative parameters plan	The Urbanists

Table 1: Application Plans

2.7 A suite of technical documents is also submitted to support the proposals. These are summarised in the table below:

Document	Consultant
Agricultural Land Classification	Soil Environment Services Ltd.
Biodiversity Net Gain Assessment	ERAP
Design and Access Statement	Sedgwick Associates
Ecological Assessment (December 2022)	ERAP
Flood Risk Assessment	Enzygo
Heritage Assessment	Kathryn Sather and Associates
Landscape and Visual Assessment	SLR
Phase 1 Desk Study	Brownfield Solutions
Transport Statement (December 2022)	Stantec
Tree Report	AWA Tree Consultants
Utility Search Report	Brownfield Solutions

Table 2: Application Documents

2.8 This application contains all the documentation required to meet the national and local validation requirements.

3. The Site and Surrounding Areas

The Site

- 3.1 The site comprises a green field site located within the settlement of Broughton, Preston.



Figure 1: Site Location Plan

- 3.2 The site is located on the western side of Garstang Road, in the settlement of Broughton. To the north, the site is bound by built development of Broughton. To the south of the site is the access road to Bank Hall and Bank Hall Farm. This farm comprises three barns now converted into dwellings. Further south, is the Lancashire and Cumbria ambulance headquarters.
- 3.3 Further south of the site is the M55 which bisects the land between Broughton (to the North) and the wider Preston urban area to the South. The M55 provides a physical barrier between the two settlements.
- 3.4 The site has frontage along the whole of the eastern boundary onto Garstang Road. The proposed site access is also taken from Garstang Road.
- 3.5 The northern part of the western boundary would adjoin the recently consented development scheme at Sandy Gate Lane which is under construction. A full overview of this application is provided later in this statement.
- 3.6 The Guild Wheel, a designated cycle route, runs along the eastern boundary of the site and part of the northern boundary. The Guild Wheel is a circa. 20 mile long cycle way, running between Preston and Broughton, offering designated routes to cyclists to explore the wider area whilst also provide opportunities to connect to jobs, services, facilities and leisure.

- 3.7 A number of Public Rights of Way (PROWs) run around the vicinity of the site. These provide good permeability and access to the surrounding settlements, as well as providing accessibility to the open countryside beyond the wider vicinity of the site.
- 3.8 The site benefits from a relatively flat topography and is located within Flood Zone 1 and is therefore considered to be at the lowest risk of flooding.
- 3.9 The site is not located in a Conservation Area, nor does it contain any listed features. A number of listed buildings exist near the site. Bank Hall and Bank Hall Farm are Grade II listed. Other listed buildings include the Amounderness War Memorial, which is located close to the junction of Garstang Road and the access to Bank Hall.
- 3.10 These assets are considered a sufficient distance away from the proposed development to mean that listed building consent would not be required for the proposed development. However, to fully assess the heritage assets, Kathryn Sather Associates (KSA) have prepared a heritage assessment, which is discussed further in this statement.

The Surrounding Built Form

- 3.11 As outlined above, the site is situated within the settlement of Broughton. Broughton is a village in the borough of Preston with a population of circa. 1,500 people.
- 3.12 The built form comprises predominantly residential in the form of single and two storey properties.
- 3.13 A number of local amenities exist including schools (both primary and secondary), convenience shops, restaurants, cafes and pubs.
- 3.14 A number of development proposals have recently been approved within Broughton which are discussed in further detail throughout statement. These are material considerations.

Strategic Policy Designations

- 3.15 The application site is designated as 'open countryside' under Policy EN1 of the Preston Local Plan.
- 3.16 The application site is a green field site which is included as an Area of Separation as outlined by Policy EN4 of the Local Plan.

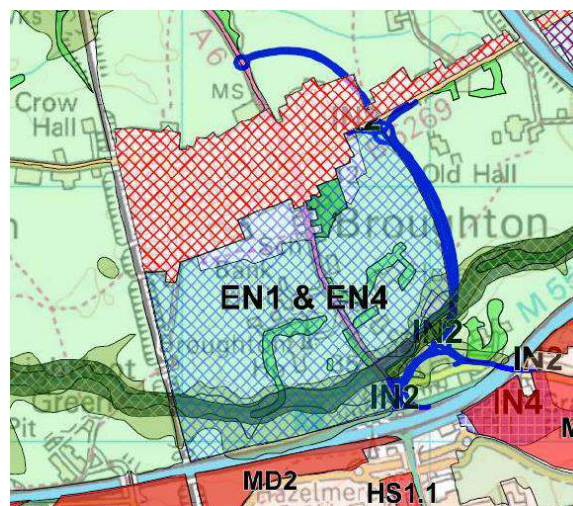


Figure 2- Plan showing designations of EN1 and EN4

- 3.17 The site is included within the Neighbourhood Plan Area but is not subject to any designations or allocations.
- 3.18 The site is not located within a key service area or in the Preston/South Ribble Urban area as outlined by Policy 1 of the Central Lancashire Local Plan.
- 3.19 The site is not listed and is not located within a Conservation Area.

4. Planning History

4.1 This application follows a recent refusal for development at the same site. The application was submitted by Hollins Strategic Land and refused by Preston City Council in January 2022.

4.2 The application sought consent for:

Outline planning application seeking approval for access only for residential development for up to 51no. dwellings with associated works (all other matters reserved)

4.3 Preston Council refused the application citing one reason for refusal. This was:

1. *The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood Development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.*

Case Officer Comments

4.4 Through the assessment of the previous application, the Case Officer made a number of observations and conclusions about the proposed development which remain material considerations in this re-submission application. The full committee report is included at Appendix 1. These are summarised below:

- In their view, the location of the development would not be in line with the spatial strategy set out in the Central Lancashire Plan.
- The proposed development would not have any impact on the Area of Separation.
- The open space proposed in the southern part of the site would successfully separate the site from existing buildings and the features within the public open space. This would complement the existing facilities on King George V playing fields to the north east of the site.
- The site is well contained visually so the proposals would not have any undue impact visually on the surrounding landscape.
- Residential development on a greenfield site within the open countryside, regardless of specifics must cause harm. In this instance, the harm would be mitigated by the site-specific conditions and mitigation is proposed. Therefore,

the proposals do not conflict with Policy 13 of the Core Strategy and Policy 21 of the Neighbourhood Plan.

- The parameters plan which was submitted through the application process confirmed that the development would not impact upon the setting of the surrounding listed buildings.
- Residential development has commenced at Key Fold Farm meaning that the site context is characterised by residential development.
- The proposed development would meet the policy requirements for affordable housing (35%). The type and tenure would be secured via a S106 agreement. The officer confirmed that this complied with the Affordable Housing SPD and the Core Strategy Policy 7.
- The proposal would provide 51 dwellings. Officers concluded that this was an appropriate development quantum for the site and agreed that the detailed design points could be agreed through a RM application.
- The application provides sufficient open space in line with Policy H3 of the Local Plan and Policy 17 of the Core Strategy.
- The application site is located a sufficient distance from any neighbouring properties to prevent unacceptable harm in terms of amenity.
- The proposed landscaping and open space would provide a sufficient off set to avoid any impact to dwellings located at the south west of the application site.
- Safe and effective access can be achieved into the site using a new access point on Garstang Road.

Consultation Comments

4.5 Through the determination of the application, a number of points were agreed with the Council and other statutory consultees. For clarity, these are summarised in the table below and further detail is provided in the technical assessment section of this report.

Consultee	Comment	Agreed?
United Utilities	No objection subject to appropriate conditions to control surface water management	Y
Natural England	No objection	Y
County Highways	Initially raised objections given the concern around the safe and suitable access to the site. However, this was addressed through the submission of further information.	Y

	On the basis of the amended details submitted through the course of the application, County Highways raised no objections subject to appropriate conditions being applied to any decision.	
Highways England	No objection subject to a condition requiring a travel plan.	Y
County Education	No objection subject to a S106 obligation to secure funding for additional school places.	Y
Greater Manchester Ecology Unit	No objection subject to conditions relating to tree protection measures, external lighting, vegetation clearance (and timing of this), and Amphibian Reasonable Avoidance Measures as well as submission of biodiversity enhancement measures.	Y
Environmental Health	No objection subject to following the recommendations of the Phase 1 Desk Study Assessment and the undertaking of a Phase 2 Geo-Environmental Site Investigation.	Y
Parks and Horticulture Service (landscape)	<p>The landscape team suggested that a number of objectives should be achieved:</p> <ul style="list-style-type: none"> - Respecting the setting of the listed buildings to the south of the site - Delivering significant biodiversity enhancements - Providing public open space - Accommodating sustainable urban drainage - Retention of existing trees and hedgerows on all boundaries (other than those affected by access) - Providing connection to the Guild Wheel <p>They suggested that the rural edge/leafy character of Broughton should be protected by widening the existing green frontage of the site, which would also respect the setting of the heritage assets.</p> <p>The open space should also separate the site from existing buildings.</p> <p>The open space consultees raised no objections to the proposed development. furthermore, the LPA did not cite an impact on the Area of Separation as a reason for refusal concluding that the scheme as previously</p>	Y

	submitted resulted in no/limited harm to the countryside and landscape.	
Waste Management	No objection subject to collection agreements and a Waste Management Plan	Y

Table 3: Summary of Statutory Consultee Comments

4.6 In addition to the statutory comments outlined above, a number of comments were made by residents and other stakeholders. These are summarised below:

Consultee	Comment
Broughton Parish Council	<p>Object to the development on the following grounds:</p> <ul style="list-style-type: none"> • The site is not designated in the Broughton Neighbourhood Plan; • The site is within the current "area of separation" – an area that Preston City Council have submitted for the revised Central Lancashire Core Strategy to be retained; • The site crosses the Guild Wheel/Garstang Road cycle track; • The proposed development will add traffic to Garstang Road that was narrowed and had a 20mph speed limit (currently unenforceable) when the bypass was built. The village centre has major parking issues already, and this will only exacerbate the issues; • The site is open countryside; • The adjoining sites off Sandy Gate Lane and opposite on Keyfold Farm were only granted planning permission on appeal as Preston City Council could not demonstrate a 5 year land supply – which they now can.
Right Honourable Ben Wallace MP	<ul style="list-style-type: none"> • The site is contrary to the Local Plan and the Broughton Neighbourhood Plan; • The site is not allocated for development; • The site is within the open countryside and Area of Separation; and • The open countryside/Area of Separation designation is important to ensuring the character of the village is maintained and not subsumed within north Preston.
Neighbour Comments	In total 10 objections were received, which commented on the following items:

	<ul style="list-style-type: none"> • Proposal is contrary to the Broughton Local Plan • Development would remove the last open space between Broughton and Fulwood • No more need for housing in Broughton • Loss of hedgerows and subsequent wildlife • Impact on highway safety • Impact on nearby heritage assets • The proposals fail to take into account the drainage culvert on the site • Detrimental impact on visual amenity • Lack of amenities within the village to cater for more residents
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Table 4: Summary of Neighbour and Stakeholder Comments

- 4.7 Whilst it is noted that the application generated a number of public objections on the basis of the location of the development, a number of technical matters were agreed subject to the application of suitable conditions.
- 4.8 In considering this revised application, the previous position reached by the consultees constitutes a material consideration which must be awarded weight in the planning balance. Legal judgments confirm the importance of consistency in decision-making by local authorities but that decision-makers may depart from previous decisions if new information comes to light. Contextually, nothing has changed since the original application, so the conclusions of the reports, and the consultee liaison can be considered up to date and correct although there are a number of further material considerations and new evidence which have come to light since the determination of the original application which support the proposals. This is considered further in this Statement.

The Reason for Refusal

- 4.9 As set out above, Preston City Council cited one reason for refusal through their consideration of the previous scheme. This related to the proposed location for development, and the fact that Broughton is not an area identified for growth in the Central Lancashire Core Strategy.
- 4.10 The applicant addresses the extent of this perceived policy conflict and the significance of harm that can be attributed to it in Chapter 7 of this statement.

5. Planning Policy Context

The Local Plan

5.1 The Development Plan comprises the following documents:

- Central Lancashire Core Strategy
- The Preston Local Plan
- Broughton-in-Amounderness Neighbourhood Plan

5.2 The Development Plan documents seek to promote and direct growth within the borough of Preston to ensure a sufficient supply of housing and employment land, promote opportunities for growth and ensure well designed and resilient communities are developed.

5.3 A full overview of the relevant planning policies is provided in **Appendix 2**.

Supplementary Planning Documents

5.4 To support the Local Plan, Preston Council have adopted a number of supplementary planning documents. Of relevance to this proposal are the following documents:

- Biodiversity and Nature Conservation
- Central Lancashire Affordable Housing
- Central Lancashire Design Guide
- Central Lancashire Rural Development
- Waste Storage and Collection Guidance for Domestic and Commercial Developments

National Planning Policy Framework

5.5 The National Planning Policy Framework (NPPF) sets out the overarching planning policies from the Government. The NPPF was updated in 2021 and forms the overarching planning guidance in England.

5.6 The central aim of the NPPF and the planning system is highlighted in paragraph 7

'The purpose of the planning system is to contribute to the achievement of sustainable development.'

5.7 Where proposals are sustainable there is a presumption in favour of the development which is the core of the NPPF:

'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development' (paragraph 10).

- 5.8 The NPPF advises that there are three dimensions to sustainable development: economic, social and environmental (Para. 8) and establishes a presumption in favour of sustainable development stating that sustainable development proposals need *'approving... without delay'* (Para. 11).
- 5.9 The Framework, taken as whole, represents the Government's definition of what constitutes sustainable development. These aims are mutually dependent and should be sought jointly and simultaneously by the planning system.

Delivering a Sufficient Supply of Homes

- 5.10 The NPPF supports the Government's objective of significantly boosting the supply of homes, requiring a sufficient quantity and variety of land to come forward.
- 5.11 The minimum number of homes required should be informed by the local housing needs assessment, calculated using the standard methodology in national planning guidance (Para. 61).
- 5.12 Paragraph 69 encourages the use of small and medium sized sites, which can be developed in a time-efficient manner to support local authorities in meeting housing requirements.
- 5.13 Paragraph 74 requires local authorities to be able to demonstrate a *'supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing'* against local housing need.

Design

- 5.14 The NPPF supports the creation of well-designed places, which shapes sustainable communities that warrants development being acceptable.
- 5.15 Paragraph 128 states that at the very earliest stage, *'all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences'*.
- 5.16 Paragraph 130 details the minimum requirements planning policies and decisions should ensure, including:

'Developments that function well and add to the overall quality of the area, for the lifetime of the development;

- sympathetic to the local character and history, taking account of the local built environment;*
- visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- establish or maintain a strong sense of place, using materiality and massing;*
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development;*

- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.'*
- *Great weight is afforded to the inclusion of trees in the enhancing the quality of the urban environment, whilst aiding the mitigation of climate change. This is largely translated to the design of tree-lined streets, retention of trees and newly-planted trees within development.*

5.17 Paragraph 134 advises '*development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design*'.

5.18 Paragraph 134 further recommends that significant weight should be given development which accords to local design and national guidance, which displays exemplary design that achieves and/or raises the standard of design.

Heritage

5.19 Paragraph 194 of the NPPF requires as a minimum, that the significance of any heritage asset that may be affected by a proposal to be identified and assessed. The assessment should be taken into account when considering the impact of a proposal on a heritage asset.

5.20 'Great weight' should be afforded to the preservation of designated heritage assets, stressing 'the more important the asset, the greater the weight should be' (Para. 199). This is of particular relevance for Conservation Areas.

5.21 Paragraph 202 goes on to state: 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...'

5.22 Paragraph 206 advises 'Local planning authorities to look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.

Other Material Considerations

5.23 A number of other material considerations are relevant to the decision making process of this application. Some have newly arisen since the previous decision.

5.24 Section 3 of this reports sets out the planning history of the site and goes into detail about the points of agreement that were established through the determination of the previous application. Whilst this proposal was refused, the conclusions reached on many of the technical matters still constitute a material consideration and should be afforded suitable weight in the determination of this application.

5.25 Throughout this statement, a number of appeals are referenced where they provide important information relevant to the determination of this application. These constitute material considerations and should be given appropriate weight in the planning balance argument.

Emerging Local Plan

- 5.26 Central Lancashire started the consultation on Part One (Preferred Options) of the new Local Plan in December 2022. The consultation is open until the 24th February 2023. Given the embryonic stages of the Plan, the policies can be given limited weight, however, it is useful to review the document when preparing applications within the Plan Area. The latest published housing needs evidence base supporting the production of the new Local Plan are given weight in the planning balance.
- 5.27 Of particular reference to this proposed development is the revised Settlement Hierarchy and the proposed allocation of housing numbers (110 dwellings) in Broughton. On this basis, appropriate reference has been made to emerging policies throughout this statement.

6. The Changing Nature of Broughton

- 6.1 Broughton is a village situated approximately 5km north of Preston city centre but is one of the closest settlements to Preston. The village is situated north of the M55 and close to the junction with the M6.
- 6.2 Over recent years, the town has undergone a number of changes, through the improvements to infrastructure, an increase in population and also a number of housing schemes being approved. Such changes have been particularly marked since the years 2012 and 2015 (when the Local Plan documents were adopted). This section of the statement gives an overview of this change, and demonstrates how Broughton has evolved and changed as a settlement since the adoption of the Development Plan documents.

Infrastructure

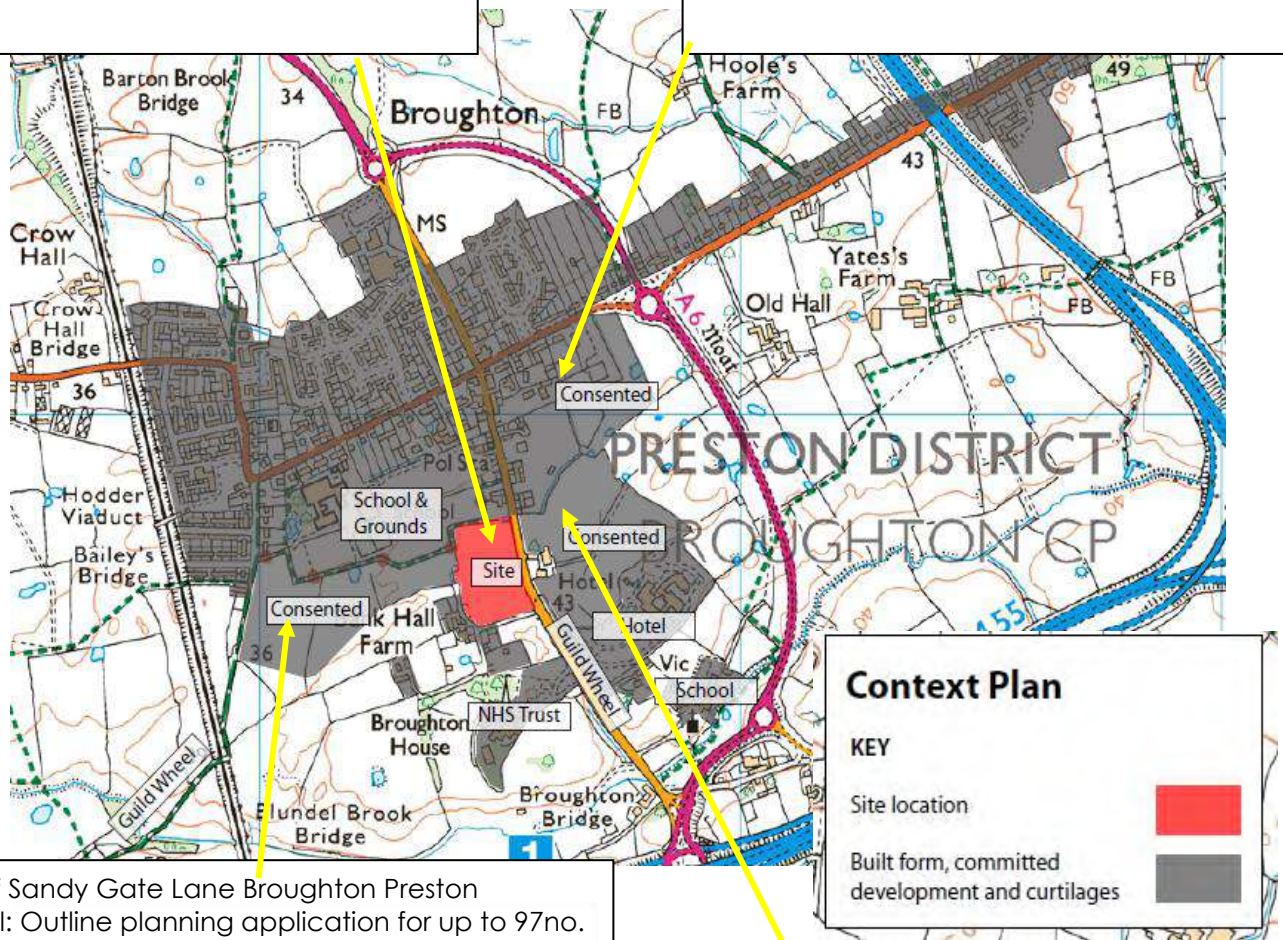
- 6.3 A number of infrastructure improvements have been made in Broughton. In 2017, a bypass running between Preston and Broughton opened after 40 years of negotiations. The road covers a 2km stretch and sought to reduce the traffic flows within Broughton by 90%.
- 6.4 Over the last 7 years since the plan was adopted, a number of changes have also been made to the cycling infrastructure in Broughton. The Guild Wheel, a 21 mile cycle route running from Preston has undergone several changes and enhancements to improve the facilities. There has also been significant regeneration within the village with public realm improvements, a new Co-op convenience store, dedicated cycleways and bus stop upgrades a short distance from the site.
- 6.5 These infrastructure improvements have sought to enhance and evolve Broughton and the surrounding areas as a destination for living and working. The enhancement of the Guild Wheel has sought to promote more sustainable modes of transport, whilst the Bypass aims to reduce traffic flows and associated congestion within the town centre. The investment in the bypass suggests that the local area has the expectation of a growing population, and that infrastructure is being developed to provide sufficient capacity.
- 6.6 In summary, these areas of investment have sought to improve and enhance the infrastructure offer in Broughton making it a more sustainable place to live and work.

Settlement Growth and Approved Developments

- 6.7 Over the last 5 years, a number of development proposals have been approved in and around Broughton. Such proposals have sought to increase the level of housing in the village to respond to the localised housing need.
- 6.8 Through the previous application, criticism was made with regards to the location of the development in relation to the settlement boundary and the direction of growth as set out in Policy S1 of the Core Strategy. A full overview of this assessment, and our critique, is provided in the following section.
- 6.9 It is clear to see through the evidence presented above that physically the nature of Broughton has changed. The settlement is growing to respond to rising populations and a desire to live and work in this part of Preston. The map below shows how the settlement has changed, and the boundaries are evolving in response to this demand:

Application Site: Land west of Garstang Road, Broughton, Preston, PR3 5JA
 Proposal: Outline planning application seeking approval for access only for residential development for up to 51no. dwellings with associated works (all matters reserved)
 App no. 06/2021/1104 (Original Application Refused at Committee on 6th January 2022)

Land off Whittingham Lane and James Towers Way, Preston, Broughton, PR3 5JB
 Proposal: Outline planning application seeking approval for access only for residential development for up to 81no. dwellings with associated works (all other matters reserved)
 App no. 06/2021/0423 (Refused at Committee on 05th October 2021)



Land off Sandy Gate Lane Broughton Preston
 Proposal: Outline planning application for up to 97no. dwellings (access applied for only).
 Original - App no. 06/2016/0736 (Refused at Committee on 02nd May 2017)
Re-submission - App no. 06/2019/0974 (Approval of reserved matters on 14th November 2022 for application (namely scale, layout, landscaping and appearance) pursuant to outline permission 06/2016/0736 for up to 97no. dwellings.

Key Fold Farm, 430, Garstang Road, Preston, PR3 5JB
 Proposal: Outline application for residential development for up to 130 houses with access considered.
 App no. 06/2017/0097 (Refused at Committee on 20th June 2017)
Appeal ref: APP/N2345/W/17/3179177 - Permission granted on 03rd April 2018

Figure 3- Map showing the evolution of the Broughton Settlement

- 6.10 On the basis of the information above, we conclude that Broughton is a sustainable location for growth, capable of accommodating specific residential development.
- 6.11 This position has been further reiterated and supported by the publication of the Central Lancashire Local Plan - Preferred Options - Part One. In the draft Plan, the Council propose to designate Broughton as a 'Rural and Local Centre' and also allocate land for 110 dwellings in the settlement. These allocations signify a distinct change in the treatment of Broughton compared to the existing Local Plan and highlight the evolution of Broughton as a settlement and the suitability and sustainability as a location for growth.
- 6.12 In addition, the emerging Local Plan also seeks new developments to be within a 20-minute neighbourhood. It is considered there is no better available site in Broughton that would meet these objectives, being within short walking distance of a range of services and facilities, whilst minimising landscape harms.
- 6.13 The applicant will continue to promote the site through this process.

7. The Revised Proposals

7.1 This planning statement supports the re-submission of an application to Preston City Council for the following development:

Outline planning application seeking approval for access only for residential development for up to 51no. dwellings (including affordable housing, First Homes, accommodation for over 55's, accessible and adaptable wheelchair provision and self-build plots) with associated works (all other matters reserved)

7.2 The only change to the application relates to the type and tenure of accommodation proposed. The layout and all technical considerations remain as per the original submission which was considered by Preston City Council through 2021. A full overview of the technical considerations is provided in chapter 8 of this statement, but they are summarised below for reference:

- Outline application to deliver up to 51 new homes
- Access to be taken off Garstang Road comprising a simple priority junction
- Open space provided in the southern part of the site
- High quality landscaping to create off sets and buffers around the perimeter of the site
- A biodiversity net gain of 33.34% for habitats and 10.44% for hedgerows

7.3 For reference, a proposed site layout is included below, however the Parameter Plan will be a condition of any approval:



Figure 4- Indicative Site Layout (proposed)

8. Assessment of the Proposed Development

Scope of the Revised Application

- 8.1 As has been set out elsewhere in this statement, the revised proposal does not seek to make major amendments to the design of the scheme. The proposal reflects a change to the proposed tenure and type of accommodation brought forward in response to newly available information. All other matters remain as per the original application, many of which were agreed through the consultation process. A full overview of the technical pack and the conclusions reached previously are provided in the following chapter.

Principle of Development

- 8.2 The previous application was refused on the following grounds:

The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood Development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.

- 8.3 Given this reason for refusal, it is necessary to review and critique the policies which Preston considered the development to be in conflict with. As such, we present a case which focusses on:

- 1) The location of growth within Broughton (Policy EN1)
- 2) The impact of the development on the 'open countryside'
- 3) The impact of the proposed development on the area of separation (Policy EN4)

- 8.4 We assess each of these matters and provide evidence in support of our position on determining the relevance or extent of any perceived conflict or impact.

Housing Land Supply Position

- 8.5 Policy 4(a) of the Core Strategy seeks to deliver a total of 22,158 dwellings across the three Central Lancashire districts over the plan period (2010-2026).
- 8.6 There has been much discussion around which method should be used to calculate the housing land supply position for Preston. Up until January 2020, the Council used the Core Strategy housing requirement to assess the housing land supply. However,

following monitoring, the Council changed to the Standard Methodology under the guidance of the NPPF. This change in methodology meant that the figures cited in Policy 4(a) were out of date.

- 8.7 Using the Standard Methodology and the April 2021 housing need figure would mean that Preston could demonstrate a 15.3 years supply of housing land (given that the requirement would be for 254 dwellings per year).
- 8.8 The Council's reliance on the standard methodology has been tested at appeal throughout 2021 and 2022. The Planning Inspectorate issued decisions relating to six appeals adjacent to the village of Goosnargh and one appeal site close to Longridge and one near Barton. In determining the appeals, the Inspector confirmed;
- The population data utilised for the Policy 4 requirement was based on demographic trends from 1998-2003. The methodology for calculating housing need has changed materially since then.
 - The practical implementation of the standard methodology in Preston almost halves the housing requirement for Preston when compared to the Local Plan figures.
- 8.9 The Inspector, in the determination of the aforementioned appeals, concluded that Policy 4 is out of date. As such, the most appropriate figure to use to calculate housing need is the local housing need figure and not the data within Policy 4.
- 8.10 On this basis, if the Local Housing Need is utilised, then the Council can demonstrate a 14.6 year housing land supply. But if Policy 4 requirement is used, then the figures fall to 7.5 years.
- 8.11 Regardless of which methodology is used, based on the figures above, the Council can demonstrate a 5 year housing land supply, so this does not trigger the tilted balance. On this basis, the application does not seek to argue that the LPA cannot demonstrate a 5 year housing land supply position currently, and therefore brings the case forward on a 'flat balance'. Paragraph 12 of the NPPF states:

The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Location of the Proposed Development

Development in the Lower Order Settlements

- 8.12 Policy 1 of the Central Lancashire Core Strategy seeks to direct growth within the Plan area to higher order settlements. Part f of the Policy states that '*in other places- smaller villages, substantial built up frontages and Major Developed Sites- development will typically be **small scale and limited to appropriate infilling**, conversion of buildings and **proposals to meet local need** unless there are exceptional reasons for larger scale redevelopment schemes*'. (Our emphasis added).

- 8.13 Furthermore, Policy EN1 of the Local Plan forms part of the spatial strategy for Preston. EN1, and the supporting Rural Development SPD, seeks to direct development towards 'appropriate locations' by protecting areas of open countryside from development which fails to meet the policy criteria. The purpose of Policy EN1 is **not** to protect the countryside in its own sake. It is a spatial policy aimed at directing growth to specific locations in order of preference. The Local Authority acknowledge the use, limitations and functions of Policy EN1 on page 10 of their committee report, for reference, the Committee Report is included in **Appendix 2**.
- 8.14 Whilst Policy 1 seeks to direct growth, it does not prescribe targets, or limits, to developments in specific settlements (or types of settlement). A similar situation was observed in Appeal APP/R3650/W/21/3278196², for a residential development scheme in Alfold. This appeal decision assessed a spatial policy and the absence of capping development numbers in specific settlements.
- 8.15 The policy in question, like P1 of the Central Lancashire Core Strategy, sought to prioritise development in higher order settlements and allowed for 'limited' growth in lower order settlements. However, the definition of 'limited growth' was missing from the Policy, leaving opportunities for interpretation and justification of development.
- 8.16 In the determination of the appeal, Inspector Stephens stated that whilst the settlement subject to the application was '*doubling as a result of recent consents*', the lack of ceiling or development cap in the policy, did not mean the proposed scheme was indicative of a policy breach³. Furthermore, the Inspector stated that as the intention of the policies was to meet the overarching, borough wide development targets, the development of the proposed site would comply with this strategic aim, therefore not representing a policy conflict.
- 8.17 Turning to Broughton and the Core Strategy, as with the case in Alfold, Policy 1 of the CLCS does **not** prescribe any targets or impose a ceiling on development in lower order settlements, such as Broughton. It is acknowledged that there is a plan wide housing **target** and a requirement of the Council to meet this. Whilst there is commentary around the desired location for growth (in line with the settlement hierarchy), there is **no** commitment or **limit** to the actual development numbers that should be achieved/not breached in each specific settlement.
- 8.18 Using the same logic that Inspector Stephens applied, means that even though Broughton is at the lower end of the settlement hierarchy, and therefore subject to '*lower levels*' of growth, the lack of specific targets in the policy does not equate to unacceptable or unsustainable growth. Furthermore, the general compliance with the overall development aspirations of the Plan should be given weight in the planning balance, regardless of which type of settlement they are proposed within.
- 8.19 Furthermore, Policy 1 only states that development in other rural areas should be 'limited'- but, as with Alfold, the plan is silent on the quantity of such development within Broughton. Given the absence of any specific development quotas for Broughton, it suggests that subject to a thorough and robust justification for the scheme being put forward, there is scope for an applicant to demonstrate that a proposed development is appropriate for development within sustainable lower order settlements and the consideration of specific harm or impacts and consequent benefits brought by any particular scheme.

² Appeal Ref: APP/R3650/W/21/3278196
Land west of Loxwood Road, Alford, Surrey, GU6 8HN

³ Paragraph 25

- 8.20 Relevant assessments on development in lower order settlements were also made by Inspector Edwards in appeal APP/Y3940/W/21/3285458⁴. The development sought consent for 21 dwellings on land outside the defined settlement boundary of Benger. In his decision, the Inspector refers to the 'Rural Housing' section of the NPPF (paragraphs 78- 80). Paragraph 79 states that '*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities*'. For Benger, the Inspector concluded that whilst the application site was outside of the settlement boundary, the accessibility of the village and the associated facilities would ensure this was a sustainable location, and the development would promote the vitality and success of the rural facilities. In the case of Broughton, it is demonstrated below that the settlement presents a sustainable village capable of accommodating growth. As such, the approval of this application would assist in supporting and sustaining the businesses and services that exist within Broughton village, thus complying with paragraph 79 of the Framework.
- 8.21 Comparable arguments around the location of growth were also noted in Appeal reference APP/P0240/W/18/3211229⁵. In her assessment of the proposals, Inspector Vyse acknowledged the changing nature of Clifton. She confirmed that the '*growth is a characteristic of the settlement*'. As Clifton had undergone a number of residential developments, however such consents were not causing a '*material change to the overall character of the village in its current form or its identity as a nucleated settlement surrounded by fields*' (paragraph 16).
- 8.22 For Broughton, Inspector Manning's concluded that Broughton had evolved since its original 'nuclei' however, in line with conclusions of Inspector Vyse, it is our view that this development would not materially harm the overall character of the village – and indeed the officer report for the original application agrees. Therefore, whilst the location of growth would not completely comply with the settlement hierarchy of Policy 1 of the Core Strategy, the intention of the Policy and the aspiration to maintain Broughton as a lower order settlement would be maintained. This approach, and conclusion was confirmed in the Clifton Case and confirms that expansions of rural settlements doesn't instinctively take away from their rural characteristics.

Position of Broughton in the Settlement Hierarchy

- 8.23 Through the assessment of the previous application, the Council stated that the site is not located within a Key Service area or a Main Urban Area. This is the position which informed the adoption of the current plan with an evidence base over a decade old, however, there is clear and convincing evidence to demonstrate that the settlement of Broughton has now changed, and the settlement today presents a different identity to when the Development Plan documents were adopted. As has been set out in the preceding chapters, the approval of several planning appeals on land immediately surrounding the application site has caused the settlement boundary of Broughton to shift and grow to accommodate these forthcoming developments.
- 8.24 Inspector Manning, when considering appeal APP/N2345/W/17/3179105⁶, confirmed that '*it is very apparent that Broughton has expanded beyond its early nuclei*'. This growth has been reviewed and quantified and compared against the experienced and predicted growth of other settlements within the hierarchy.

⁴ Appeal Ref: APP/Y3940/W/21/3285458 Land at Sutton Lane, Sutton Benger, Wiltshire SN15 4RR

⁵ Appeal Ref: APP/P0240/W/18/3211229

Land off Broad Street, Clifton SG17 5RR

⁶ Appeal Ref: APP/N2345/W/17/3179105

Land off Sandy Gate Lane, Broughton, Preston,
Lancashire PR3 5LA

Settlement	Population growth over the last 10 years	Number of dwellings approved over the plan period.
Key service centres		
Longridge	7,526 to 8,437	649
Urban Local Service Centres		
Adlington	9,211 to 10,372	183
Clayton Brook Green		46
Clayton-le-Woods	14,532 to 15,960	335
Coppull	7,959 to 8,304	399
Euxton	8,118 to 8,306	646
Whittle – le- Woods	5,434 to 6,810	296
Local Centres		
Brinscall/Withnell	1,388 to 1,335 / 898 to 853	14
Eccleston	4,234 to 4,541	114
Longton	8,800 to 8922	32
Other Rural Centres		
Broughton		1,392

Table 5- data showing settlement growth

- 8.25 As can be seen from the table above, all settlements in the Central Lancashire area have experienced growth (through approval of residential developments) since the adoption of the Plan. Despite growth being focussed in the higher order settlements (as per Policy 1 of the Core Strategy), the Urban Local Service Centres have undergone the most significant growth with over 1,900 new dwellings being approved in these locations in total.
- 8.26 However, the most relevant trend is the comparison between Broughton and other settlements in Central Lancashire Plan Area. As is evidenced above, Broughton has undergone significant growth through a number of approvals (over 1,300 homes have been approved since the plan was adopted), although it is important to note that part of the Broughton parish extends south of the M55 into the Preston city area where larger allocations and developments are situated. In numerical terms, these consents have approved more residential units in Broughton compared to any other settlement in the Plan area, regardless of their ranking in the hierarchy. In fact, the number of approvals in Broughton is the highest of any town noted in the hierarchy, and itself is a significant

proportion of the *total* number of approvals secured across all of the listed Urban Local Service Centres.

8.27 As we have set out through this report, the Council have previously stated that the proposed development is not suitable as it does not accord with the direction of growth as outlined in Policy S1. The evidence presented above clearly shows how the placement of Broughton in the settlement hierarchy, as a result of other approvals, does not reflect the current context. Furthermore, the position the Council has previously taken with regard to the position of Broughton in the settlement hierarchy, has been devalued as a result of the publication of the new Central Lancashire Local Plan, Preferred Options, Part 1 (draft). In the emerging Plan, the settlement hierarchy has been revisited through the revisions to the Spatial Strategy. Table 1 of the emerging Plan positions Broughton in Tier 4 (a Local and Rural Centre) with a potential allocation of 110 dwellings. This re-positioning of Broughton recognises the substantial change that has occurred in the settlement since the adoption of the Plan in 2012 and supports all the evidence put forward in this Planning Statement and supporting documents.

8.28 Whilst the publication of the Central Lancashire Local Plan, Preferred Options, Part 1 (draft) is positive for demonstrating the change in Broughton, it must be noted that the embryonic stages of this plan mean it can be given limited weight. As such, it is necessary to review and compare the characteristics of Broughton compared to other settlements in the Central Lancashire Area. To exemplify the characteristics of Broughton and how this is more comparable to a higher order settlement, an assessment has been undertaken which is evidenced below. The assessment looked at a range of settlements to understand whether the following infrastructure/ services were present:

- School (primary and/or secondary)
- Places of worship
- Health care facilities
- Pubs/restaurants
- Convenience retail shops

Settlement	School	Places of worship	Health Care facilities	Pubs/restaurants	Convenience retail	Leisure Facilities
Broughton	Yes – primary and secondary	Yes- St John's Baptist Church	Dental surgery	The Broughton Inn, Toll bar Café	Co-Op Broughton	Broughton tennis club, Delta Hotel
Barton	Pre-school	St Lawrences Church	No	The Sparling	No	Barton Manor Hotel
Brinscall	Pre-school	Hillside Methodist Church	No	Cricketers Arms	No	Brinscall Swimming Pool
Churchtown	No	St Helen's Methodist Church	No	Horns Inn	No	No
Goosnargh & Whittingham	Primary school	St Mary's Church	No	The Stag's Head	No	Tennis Club

Hoole	Primary school	Hoole Wesleyan Methodist Church,	No	San Marco	No	No
Woodplumpton	Yes- primary school	St Anne's Church	No	The Wheatsheaf	No	No

Table 6- comparison of services in various settlements

- 8.29 The table above demonstrates that Broughton as a settlement has a wealth of amenities and services available to local residents. It is the only rural settlement which accommodates a primary and secondary school and has medical facilities within the village. All other settlements analysed are deficient in at least one of these facilities making them arguably less sustainable than Broughton.
- 8.30 On the basis of the evidence outlined above, the applicant contests that the continued consideration of Broughton as a 'rural area' in the settlement hierarchy remains up-to-date. The evidence clearly shows that the settlement is growing and evolving and if the settlement hierarchy was re-considered, it is likely Broughton would feature higher up the ranking as indeed it is through the emerging Local Plan.

Sustainability of Broughton

- 8.31 Looking more generally at the principle of development in Broughton, it is necessary to undertake an assessment of the sustainability of this location and the capacity to accommodate further growth.
- 8.32 Such matters were discussed in the appeal decisions for development at Sandy Gate Lane (APP/N2345/W/17/3179105) and Key Fold Farm (APP/N2345/W/17/3179177). The principle matters were assessed by Inspector Manning and an assessment given in a conjoined appeal decision. The detailed matters were addressed separately.
- 8.33 In their assessment of development at Sandy Gate Lane, initially, the Council attested that Broughton did not reflect a sustainable location for growth owing to its positioning on the settlement hierarchy and associated infrastructure, facilities and amenities. However, through the co-joined appeal via public inquiry, the Council withdrew their objection relating to the suitability of Broughton as a sustainable location for growth. When determining Key Fold Farm, the Council suggested that Broughton *'is a rural village with low accessibility to local employment areas, shops and services'*. In conclusion, Inspector Manning stated that he did *'not consider Broughton to be notably poorly served in terms of access to services and facilities or choice of transport modes'*. Moreover, the Inspector confirmed that developments at Key Fold Farm and Sandy Gate Lane would be *'well located in terms by comparison with housing sites associated with many freestanding settlements'* (paragraph 66). Overall, Inspector Manning concluded that, *'the initial stance of the Council does not in my view withstand scrutiny'*.
- 8.34 The conclusions of Inspector Manning are important material considerations in the determination of this development. It has been confirmed at Appeal (in 2018) that Broughton constitutes a sustainable location, which, as proven by the appeal decisions for Sandy Gate Lane and Key Fold Farm, is capable of accommodating residential growth. Indeed, even since these appeal decision, Broughton has undergone a transformation in terms of regeneration of the public realm, public transport enhancements, opening of the bypass and a new larger Co-op convenience store.

- 8.35 Whilst it is noted that the application site lies outside the village boundary, as has been set out in paragraph 7.20, the Framework promotes rural development which supports and enhances the vitality of rural settlements and facilities. Development lying outside a settlement boundary does not automatically mean that actual harm arises, particularly if the context has changed since the boundaries were adopted. It has been demonstrated that the future residents of this scheme would have access to a good range of services and amenities within Broughton and the walk distance to these is appropriate and acceptable. In line with the decision made by Inspector Edwards, it is considered that this type of rural development can succeed in enhancing and promoting the sustainability of facilities within the village.
- 8.36 Overall, it has been concluded by the Inspectorate that Broughton comprises a sustainable location capable of accommodating some residential development. Furthermore, development on this site would comply with paragraph 79 of the Framework by supporting the services within Broughton. These decisions are material in reaching a judgement against the perceived weight to be given to a conflict of how spatially development is to be directed to other settlements.

The Need to Locate Development in Areas Closest to the City

- 8.37 The Core Strategy recognises the city centre of Preston as the largest concentration of commercial activity in Central Lancashire. The University of Central Lancashire, which is planning a £700m expansion of their campus over the next 10 years, is a significant driver for economic growth in the region. In addition, the north of the city is the least constrained area in Preston and indeed Central Lancashire as shown in Figure 4.2 of the Icen report.

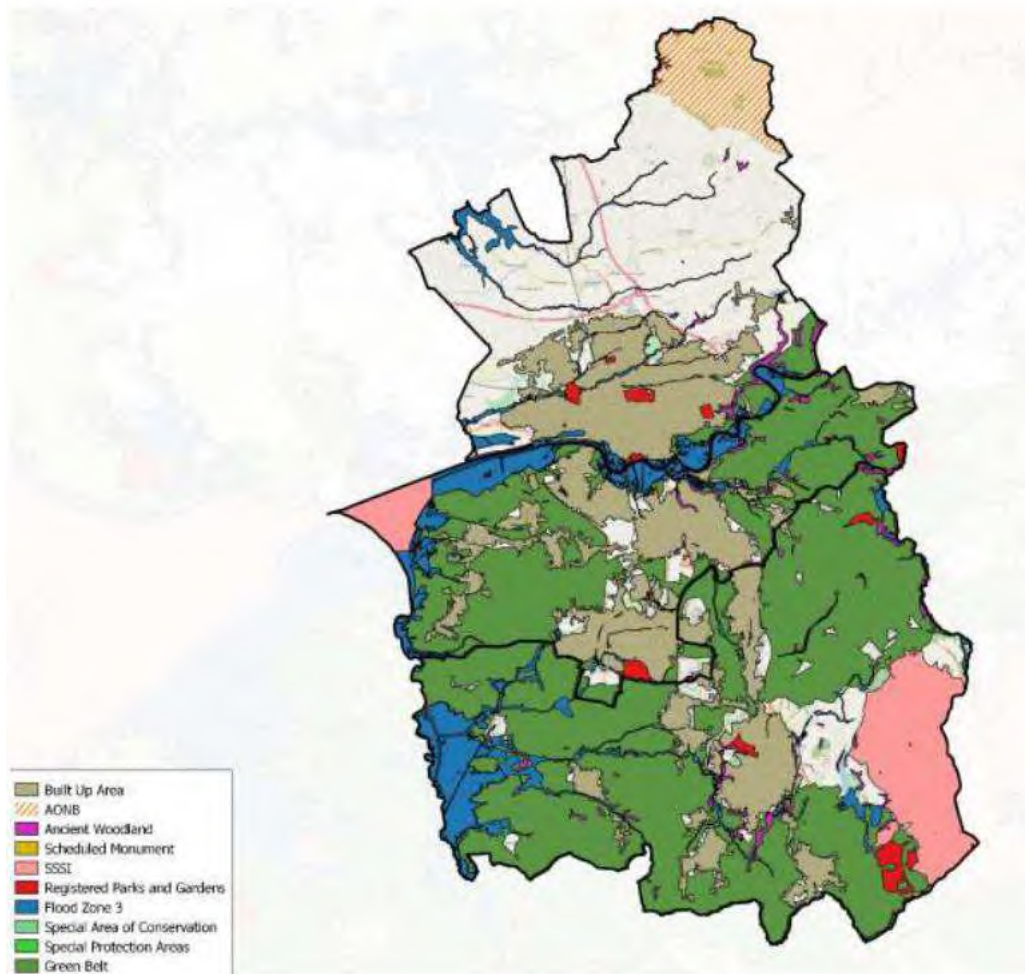


Figure 5- Central Lancashire – Nationally Significant Constraints

- 8.38 The GL Hearn SHMA (2017) noted that discussions with the economic development officer at Preston City Council viewed growth around the urban area as good for the city, given the wider benefits to the Central Lancashire area.
- 8.39 However, the DLP Study (2022) found the level of employment in Preston exceeds the size of the resident workforce indicating there is a trend for 'in commuting'. The opposite is the case in both Chorley and South Ribble where the number of resident workers exceeds the level of employment, indicating a net out-commute. The commuting flows from Figure 35 of the report show 13,492 people travelling from South Ribble into Preston, 4,770 people from Chorley, 2,904 people from Fylde, 2,404 people from Wyre and 2,315 people from Blackburn. The report finds that "Preston demonstrates statistically significant inflows with a wider range of neighbouring authorities as a result of its urban characteristics and status as a centre for higher education". This significant in-flow of people from outside the district could be minimised by locating new homes closer to the city. In turn, this would create a better live/work environment and help Preston continue to build on its economic strength as the key city of the region.
- 8.40 In addition, locating new homes closer to jobs and services creates reduced journeys, lower emissions and a healthier environment, and is particularly important as Preston City Council declared a climate emergency in April 2019. Increasing opportunities for people to live near where they work is an important facet of good-planning and is recognised by PPG (ID: 2a-006-20190220). Indeed, the Icen report (2020) supported

this approach and noted Preston has 48% of all jobs in Central Lancashire (86,000) but less proportion of the population live there (39% as of 2021).

- 8.41 The DLP report also found Preston experienced a significant migration *out* of the city (-441 people) for all age groups (except the 15-19 group) based on ONS estimates. The report found that this relates broadly to outflows from Preston to South Ribble, likely due to “*supply-side pressures in terms of housing search patterns and population growth in younger age groups*”. The 20-29 age group sees a net outflow as students leave following graduation and as young people move elsewhere for work. However, it is concerning that the limited offer of affordable homes in Preston may also have an impact. In the long term this may have an impact on Preston being able to retain a young workforce to support its economic potential.
- 8.42 The recent DLP report (2022) stated that there is a growing demand in rural and semi-rural locations with a “*potential opportunity to locate development in accessible locations close to strategic transport networks, encourage sustainable travel and unlocking infrastructure improvements*”. Broughton is an excellent location being close to Preston city with very good public transport links including bus services and cycle routes via the Guild Wheel. These merits may not completely eradicate car use, but it does help reduce car journey lengths and CO² emissions.
- 8.43 In addition, the City Deal Infrastructure Delivery Programme and Investment Fund is intended to act as a catalyst for the construction of up to 17,484 new homes over the 10-year period from 2014-24 (1,748 dpa). Performance of the City Deal has been poor with a shortfall of 1,214 dwellings by 2019, as identified in the Iceni report. The City Deal remains an economic driver for the Preston and the proposed scheme will help with supporting the delivery of homes towards its wider economic objectives.

Higher Population Living in the Preston District

- 8.44 The recent DLP Housing Study (2022) states that Preston has the largest population of the Central Lancashire authorities with a population of 144,147 as per the Mid-Year Population Estimates (2020) and that the latest 2018-based projections result in higher growth compared to the 2014-based (which underpin Standard Method) which is unusual. However, even this is now understood to be a significant underestimate for Preston as confirmed by the Census 2021 data. The latest Census confirmed the population in 2021 was actually 147,900 demonstrating the population grew more quickly from 2011 than was projected by the 2014-based estimates. As a result, an extra 5,800 people live in Preston than was previously thought. These population growth trends have not yet been reflected in the housing supply and delivery, meaning there is an unmet need in Preston.
- 8.45 With this new Census information, Figure 33 of the DLP report shows that all previous projections and future growth scenarios have grossly underestimated the population in Preston for the year 2021. Projections in the SHMA (2017), in hindsight, also underestimated how much the population in Preston was growing. This has a long-term impact in that fewer homes would be planned for than are now needed. Below is an extract of the projected growth scenarios with the actual population in 2021 shown.

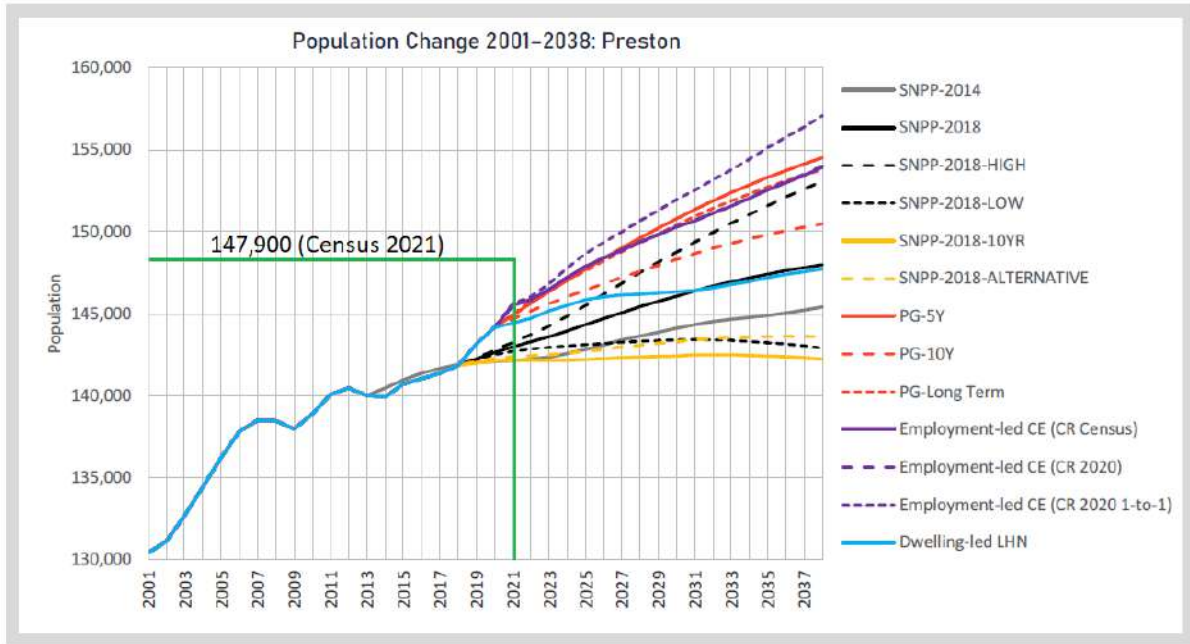


Figure 6- Population Change in Preston 2001- 2038

8.46 This will add additional pressure on housing needs in the area that have not been picked up by all previous housing assessments to-date and so it is likely future housing needs will be higher in Preston unless the Council actively seek a downturn in the economic potential of the city.

Summary

8.47 The evidence presented above and through this statement demonstrates how Broughton has evolved as a settlement since the adoption of the Local Plan and the Core Strategy.

8.48 Broughton has evolved both in terms of housing developments, and also the provision of higher quality and capacity infrastructure to accommodate such growth. Data presented shows that the growth in Broughton is considerably higher than any other settlement in the Plan Area.

8.49 In their previous critique of the proposals, the Council attested that development was unacceptable in Broughton given the location of the settlement in the hierarchy, and the strategic aims for growth across the Central Lancashire Area. The omission of specific development quantum in Policy S1 is comparable to conclusions reached in the Alfold Appeal Decision, whereby the Inspector critiqued the absence of such quotas. In his decision, the Inspector concluded that whilst this was not completely in accordance with the spatial strategy, the proposed development still accorded with the aspirations of the plan as a whole, and therefore could not be considered a policy breach as it still demonstrated sustainable development. The same logic can be applied to Broughton, given the wording of Policy S1 and the fact that the proposed development would accord with the overarching aspirations of the Development Plan.

8.50 Furthermore, it has been evidenced through this chapter that the nature of Broughton as a sustainable settlement has evolved considerably since the Local Plan and Core

Strategy were adopted. The settlement has experienced population growths and a rise in infrastructure. The Local Authority were forced to withdraw an objection based on the unsustainability of Broughton through the determination of the Sandy Gate Lane and Key Fold Farm appeals. This withdrawal and associated Inspector's comments confirmed the sustainability of Broughton for an area of growth within Preston.

- 8.51 Overall, it has been clearly demonstrated that the principle of growth in Broughton has been considered acceptable given the wealth of factors that have been presented in this chapter.

Impact of the Development on the Area of Separation

- 8.52 The application site is located within the Area of Separation as defined under Policy EN4 of the Local Plan. An overview of the site and the location of this policy is included in the plan below:

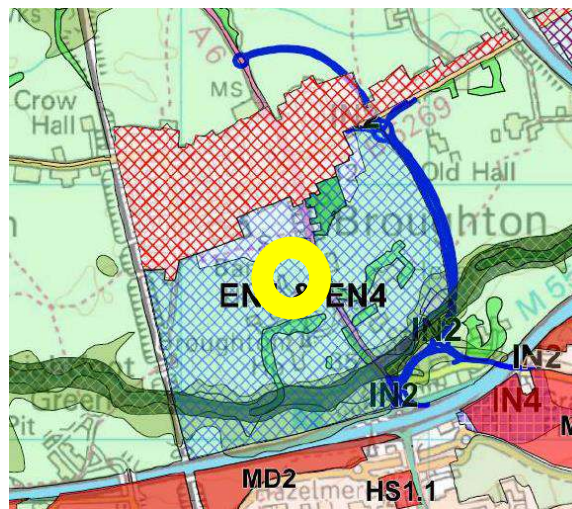


Figure 7- Plan showing the site (yellow) and the area of separation as set out in EN4 (blue hatching)

- 8.53 Policy EN4 states that proposals will be assessed in terms of their impact upon the AoS, including harm to the effectiveness of the gap between settlements, and also the degree to which the development would compromise the function of the AoS.
- 8.54 In their committee report, Officers concluded that the application as previously submitted would 'not result in the merging of the settlements Broughton and the Preston Urban Area' (page 10). Furthermore, they concluded that the proposed development would not conflict with the requirements of Policy EN4.
- 8.55 We fully agree with this conclusion noting the physical change to the settlement boundary in this location which has subsumed the application site and completely eroded the contribution the site makes to the area of separation. Furthermore, when comparing this site to the proposed allocation put forward in the emerging Local Plan (PC/HS1.5) it is clear that the development of this site would have a lower landscape impact on compared to the envisaged expansion to the north. Overall, if the Council are resistant to development that impacts the wider area, then the most logical, and least harmful development would be utilising this site to infill in the southern part of the settlement.

8.56 The circumstances surrounding the application site remain consistent with the previous proposal, therefore it can be concluded that the position reached by the Council through application 06/2021/1104 remains and no circumstances have amended this correct conclusion.

Type of Development Proposed in the 'Open Countryside'

8.57 As part of the Reason for Refusal, the Council stated that the proposed development would not accord with the 'type of development deemed permissible in the open countryside under Policy RES21 of the Broughton Neighbourhood Development Plan'.

8.58 The Neighbourhood Plan looks to allocate certain development sites within the Plan Area. In the identification of suitable sites, the Plan states that those identified would propose '*modest extensions to the settlement boundary, rounding off the wider village form*' furthermore, they would '*minimise intrusion into open countryside and the areas of separation, pose no threat to the villages' character or rural setting or to its identity and distinctiveness*' (paragraph 8.5.11 of the Broughton Neighbourhood Plan.

8.59 On the basis of the above criteria for allocating sites, and based on the evidence put forward which confirms that the site would not cause significant expansions to the settlement boundary and would round off the wider village, we contest the assertion made that the proposed development is not suitable for Broughton or conflicts with the Neighbourhood Plan. Furthermore, it has been demonstrated, and confirmed by the Council, that the proposed development has no impact on the Area of Separation, therefore, this policy conflict as cited in the previous reason for refusal should be reconsidered to avoid undue costs for the applicant if defending a future appeal.

Responding to a Localised Development Need

8.60 This application has been amended to introduce additional and varied types and tenures of accommodation. This is in response to evidence provided by the Council which demonstrates a need for specific housing in Preston. As such, the scheme has been amended to include:

- Housing for over 55's
- Increased provision of affordable housing with a focus on the affordable rented sector and First Homes
- Accessible and Adaptable M4(2) and Wheelchair M4(3) dwellings
- Larger homes for BAME households
- Self-build plots

8.61 Policy 1 of the Core Strategy and EN1 of the Local Plan provide circumstances where development in lower order settlements can be accepted. One of these circumstances is when a proposal directly responds to an identified local need and the approval of such a scheme would assist the Local Authority in meeting this need. The following section of the report confirms that this revised submission meets this policy test as a result of the changed offer and as such, complies with this part of Policy 1 and EN1.

Housing for the Over 55's

8.62 Data from the Office for National Statistics (ONS) demonstrates how the demographic breakdown of Preston compares to the rest of Central Lancashire and the UK as a whole. The table below, taken from the ONS's 2016 figures shows that Preston has a significant proportion of the population falling into the 60 and over category.

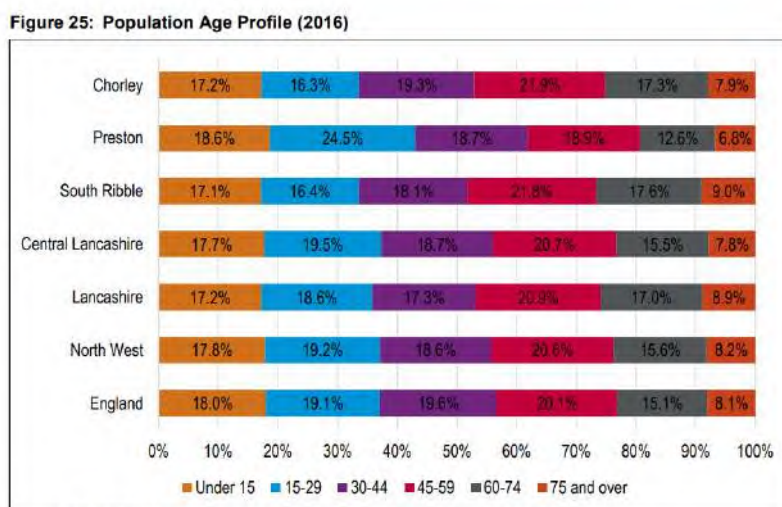


Figure 8- Population age profile in Central Lancashire

8.63 Various studies have been undertaken within the Central Lancashire area, and specifically Preston, to understand the housing need for those over 55. The latest evidence prepared by Arc4 (2022) suggests there is a need of older person accommodation in both C2 and C3 use classes. In Preston, there is a need for 1,070 (between 2021-38) C3 dwellings and 833 C2 dwellings/bed spaces. Overall across Central Lancashire, this means a total need of 106 dpa of older persons homes.

8.64 The recent DLP Housing Study (2022) finds that the Central Lancashire population has seen the largest growth in the over 65 group, with an increase of 40% since 2001, equivalent to approximately 20,000 additional people. At the same time, the size of the working age (15-64) population has increased by only 7%. The study recognises the need to increase and diversity the supply of specialist housing (including retirement homes) for older people with 1,903 more units for older people required by 2038.

8.65 The Icen Housing Study (2020) concluded a more extreme picture. Table 7.4 of the report shows the projected change in older persons in Preston. The change in those over 65 is 34.4% whilst for under 65s it is only 3.1%.

	2016	2036	Change in population	% change
Under 65	120,983	124,687	3,704	3.1%
65-74	11,300	14,287	2,987	26.4%
75-84	6,873	9,371	2,498	36.3%
85+	2,662	4,353	1,691	63.5%
Total	141,818	152,698	10,880	7.7%
Total 65+	20,835	28,011	7,176	34.4%

Source: Demographic Projections

Table 7- Projected population change for older people in Preston (2018-2038) Taken from the Icen Housing Study 2020.

- 8.66 Much of the projected increased change in households are those over 65s who are either one person (+23.6%) or couples (+47.9%) which suggests a need for smaller dwellings for over 55s which they can downsize into whilst releasing larger existing properties into the market. Table 8.2 of the Icen report shows the projected change in households across Central Lancashire.

	2018	2036	Change	% Change
One-person household (aged 65 and over)	19,571	24,195	4,623	23.6%
One-person household (aged under 65)	28,333	32,016	3,683	13.0%
Couple (aged 65 and over)	19,193	28,380	9,187	47.9%
Couple (aged under 65)	21,662	17,189	-4,474	-20.7%
A couple and one or more other adults: No dependent children	12,049	12,107	59	0.5%
Households with one dependent child	22,286	25,369	3,083	13.8%
Households with two dependent children	16,639	16,844	205	1.2%
Households with three dependent children	6,596	6,360	-236	-3.6%
Other households ²³	9,959	11,759	1,800	18.1%
TOTAL	156,288	174,219	17,930	11.5%
Total households with dependent children	45,520	48,573	3,052	6.7%

Source: Demographic Projections

Table 8- Change in Household Types in Central Lancashire (2018-2038) Taken from the Icen Housing Study 2020.

- 8.67 Clearly, given the aging population in Preston and the higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward. One type referenced by the Icen report is 'age-restricted general market housing' for those aged 55 and over including the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.
- 8.68 Taking into account the current position noted above, Central Lancashire is projected to see notable increase in the older person population, with a total number of people aged over 65 projected to increase by 39% in the period up to 2036. This compares with an overall population growth of 6.5% and a decrease in the Under 65 population of 0.8%. Converting this into a figure, this represents a projected increase of 26,500 people falling into the over 65's category. This change is evidenced in the table below:

	2016	2036	Change in population	% change
Under 65	120,983	124,687	3,704	3.1%
65-74	11,300	14,287	2,987	26.4%
75-84	6,873	9,371	2,498	36.3%
85+	2,662	4,353	1,691	63.5%
Total	141,818	152,698	10,880	7.7%
Total 65+	20,835	28,011	7,176	34.4%

Source: Demographic Projections

Table 9- Demographic Projections – taken from the Central Lancashire Housing

- 8.69 In addition to the evidenced demand for housing for older people as a result of the growing population, data from the Demographic Projections and Housing⁷ shows the types of housing that are required to accommodate the over 55's.

		Housing demand per 1,000 75+	Current supply	2018 demand	Current shortfall/ (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	62	1,043	589	-454	259	-196
	Leasehold	72	190	683	493	300	793
Housing with care	Rented	26	74	246	172	108	281
	Leasehold	22	0	211	211	93	304
Total (dwellings)		181	1,307	1,729	422	760	1,182
Care bedspaces		117	1,265	1,119	-146	492	346

Source: Derived from Demographic Projections and Housing LIN/HOSPR/EAC

Table 10- Surplus and Demand of specialist Housing within Preston in the years 2018 and 2036 taken from the Central Lancashire Housing Study prepared by Icení, 2020

- 8.70 It is noted that the categories in this evidence set, only distinguish between 'housing with support' and 'housing with care' when in fact there are many different types of accommodation for older people. Icení recognised this in the preparation of their assessment, and at point 7.10 of the assessment state that housing with support can include retirement and sheltered housing. For the purpose of this analysis, the assessment is made on the basis of the needs for retirement housing (which falls under the 'housing with support' category).
- 8.71 On this basis, there is a clear shortfall of 'housing with support'/retirement units across Preston. The demand is expected to increase as a result of the ageing population and this shortfall will also increase in line with the rising demand.
- 8.72 Hollins Strategic Land is committed to addressing the identified need within Preston and the Central Lancashire Area and therefore seeks to provide accommodation for the over 55's at this site. The exact quantum will be determined through discussions with the Local Authority, but the initial proposal would commit to a 10% provision. The location and design of these units would be agreed at Reserved Matters Stage, but the applicant is happy to enter into a S106 agreement or condition to secure the provision at Outline Stage.

Affordable Housing

- 8.73 As part of the previous application, Hollins Strategic Land committed to providing 35% of the dwellings as affordable. This accorded with the requirements of Policy 7 of the Core Strategy. Through the revised submission, a tenure split was not confirmed as this would be detailed and secured through a S106 agreement.
- 8.74 The proposed affordable housing quantum as part of this revised submission is proposed to be increased to 40%, thus exceeding the requirements of CS Policy 7. This is a positive response to the significant step-change increase in affordable housing needed in Preston recently evidenced through the Housing Need and Demand Assessment (HNDA, produced by Arc4 in 2022) and as reported by DLP in the published Central Lancashire Housing Study (2022).

⁷ LIN/HOSPR/EAC

- 8.75 The HNDA states there is a **net annual need for 377 affordable homes** across Preston. The Preston area has the greatest affordable needs across the Central Lancashire area, in Chorley (113 dpa) and South Ribble (296 dpa). This is significantly higher than the Core Strategy requirement and any previously published housing needs assessment for the Preston area. For example, the Core Strategy identified a need for 46 affordable homes per annum in Preston, the SHMA (2017) identified 239 affordable homes per annum, and the Icen Housing Study (2020) identified a need for 250 homes per annum. Overall, the latest assessment of affordable housing needs in Preston is over 8 times higher than the Core Strategy requirement demonstrating the acute need for affordable homes in Preston.
- 8.76 However, there has been no single year where this level of need has been met and, in fact, the average gross affordable housing completions in Preston since 2004 is only 83 affordable homes per annum. This is likely to be lower when taking account of demolitions and Help to Buy losses to reach a net figure. Since the start of the Core Strategy plan period, the average has been higher (131 per annum). This delivery track record is significantly below what is now needed in Preston and so the Council should look highly favourably on windfall schemes which deliver new affordable homes in sustainable locations to assist the Council in trying to meet needs.
- 8.77 The latest evidence, compared with previous published housing assessments, shows an exacerbation of affordable needs. The Icen report (2020) stated that "*studies clearly demonstrate a substantial need for additional affordable housing and the Councils should seek to maximise delivery where opportunities arise*".
- 8.78 The SHMA (GL Hearn, 2017), showed that median house prices in Preston increased by 162% between 2000 and 2015. It also confirmed that there were 8,900 households in unsuitable housing (or without housing) in Central Lancashire and around half of these were in Preston. It noted that whilst Preston is one of the more affordable locations in the country, it does have a high affordable housing need which is influenced in part by its younger population.
- 8.79 In Broughton specifically, the SHMA (2017) showed it was one of the most expensive areas to live in with prices in 2015 ranging from £185,000 to £200,000. In 2022, the average price paid in the Broughton postcode area (PR3 5) was £365,676 as recorded by Land Registry. This is a significant increase on the 2015 figure, which shows a worsening affordability position. An extract from the Arc4 presentation in September 2022 during a Developer's Forum hosted by Central Lancashire, shows that the north of Preston (which includes Broughton) is the least affordable area.

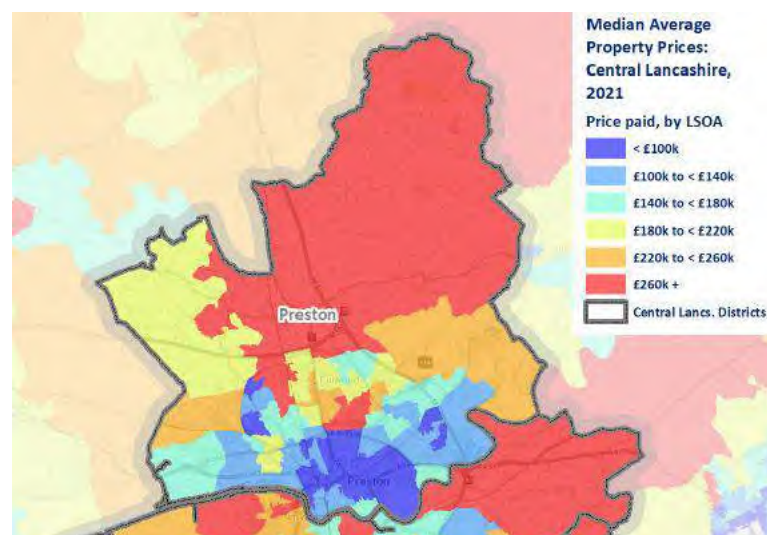


Figure 9- Heat Map of affordability in Central Lancashire

- 8.80 In terms of tenure split, the latest evidence prepared by Arc4 (2022) has suggested a tenure split of 68% of all affordable products to be 'affordable rent' and 32% to be First Homes and affordable home ownership products (e.g., shared ownership). The DLP Housing Study (2022) also highlights that there is a specific need for affordable home ownership products which was evidenced in the 2021 household survey.
- 8.81 The Icen report suggested that providing affordable homes in Preston would make new housing more accessible to people on lower incomes in particular. It found a "clear and acute need for rented affordable housing from lower income households" and that it was important that a supply of rented affordable housing is maintained to meet the needs of this group including those to which authorities have a statutory duty. The report states that analysis identified between 29% and 33% of the group of households unable to afford market housing to rent fall in the gap between the market and 80% of the market depending on location. It suggested that provision for supporting home ownership should focus on shared ownership homes. The report states that Councils should have regard to the housing report in negotiating affordable housing on schemes.
- 8.82 The older published SHMA report by GL Hearn (2017) found that provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households.
- 8.83 Based on the above evidence, Hollins Strategic Land have reviewed their offer for affordable housing as brought forward as part of this development. This revised application will deliver 40% of all units as affordable with a suggested tenure split of 68% affordable rent and 32% affordable home ownership (to include First Homes and Shared Ownership). The proposed tenure will be finalised and agreed through discussions with the Housing Officer to whom we extend an invitation to discuss a positive response to affordable needs on the scheme through the application process based on the latest evidence. We also wish to discuss enhanced design standards for new homes (accessible, adaptable and wheelchair provision), in line with the latest evidence, as detailed further in this statement.

Accessible and Adaptable M4(2) and Wheelchair M4(3) Needs

- 8.84 The Arc4 HNDA (2022) report identifies a need for 4% of new homes in Preston to be M4(3) wheelchair accessible with all other properties to be M4(2) standard. The Icen Housing Study (2020) considered that it would be sensible to design housing so that it can be adapted to a household's changing needs over time and recommended a third of all new housing is delivered to M4(2) standards; these homes are also considered 'Homes for Life'. The study also identified a projected increase in the population in Preston with a range of disabilities (+44.1% with dementia and +40.1% with mobility problems). The 2020 study also found an unmet need for wheelchair user dwellings in Central Lancashire of around 3% of households, equivalent to 1,100 homes (in Central Lancashire) or 421 homes in Preston.
- 8.85 The proposed development offer will assist with directly meeting these needs in a sustainable location, close to services, facilities and public transport, meaning those with disabilities do not need to travel far. The provision of higher accessibility standards is feasible as the site is generally flat with level access to good quality footpaths on Garstang Road and no difficult inclines.

Needs for BAME Households

8.86 The Arc4 HNDA (2022) report states there is a need in Preston for 7.5% of new homes to be larger with 4 bedrooms, and 1.1% to have 5 or more bedrooms to meet the needs of identified larger families, particularly those from the Asian community. The proposed development will assist with meeting the needs of these households.

Self-Build Accommodation

8.87 Under Section 1 of the Self Build and Custom Housebuilding Act 2015⁸, Local Authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building.

8.88 Local Authorities have a responsibility to maintain a self-build and custom housebuilding register. The register must include the following information on the register;

- The name and address of the association;
- The name and address of the lead contact;
- The number of serviced plots of land in the relevant authority's area the members of the association are seeking to acquire

8.89 To inform this re-submission, we have reviewed and assessed the specific self-build demand within Preston. The number of interests in Preston have gradually increased in line with the national trend. In the UK as a whole, there are over 35,000 people registered on the right to build register (with over 415 registered in the last month).

8.90 IcenI undertook a review of the Self Build register across Central Lancashire. Within Preston, there are a total of 25 expressions of interest in the period 2016-2019. It is important to highlight that only 1 in 8 people interested in self-build were aware of the introduction of Right to Build Registers in England⁹. It is widely acknowledged that the number of people registered on Self Build databases will likely be lower than the actual demand given the effort and cost associated with registering.

8.91 IcenI estimated a potential need of 2,292 serviced plots in Preston alone, supported by evidence from the National Custom and Self-Build Association (NaCSBA) which indicated 1 in 50 of the adult population across the country would want to purchase a custom or self-build home over the next 12 months. The report suggested Councils should promote and encourage the submission of land which is suitable for self-build and custom housebuilding.

8.92 In addition, it's prudent to look into secondary data sources to understand the fuller picture. Evidence from Buildstore PlotSearch¹⁰ found that in Preston, 148 people are registered to build with a further 468 subscribers.

8.93 The increase compared to the official self-build registers and the secondary datasets confirms that there is an increased demand for serviced plots within Preston. Whilst there is no evidence to support this hypothesis, it is well acknowledged that over the

⁸ [Self-build and Custom Housebuilding Act 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2015/22/section/1)

⁹ Ipsos Mori 'Survey of Self Build Intentions 2016' – this survey questioned nearly 2,000 people about their self-build ambition and activity

¹⁰ Buildstore PlotSearch is a free to subscribe service which records opportunities for those looking to find a serviced plot of land to build on.

Covid-19 pandemic, people had more time to consider their home circumstances and aspirations for the future. There may be trends to correlate that more people are looking into self-build prompted by a desire to have more space and control over their immediate surroundings.

- 8.94 All the evidence presented above confirms that there is a specific demand for self-build plots within Preston which has increased since the introduction of the register.
- 8.95 In order to respond to the growing demand, Hollins Strategic Land have committed to allocating up to two plots as self-build plots, subject to discussions and agreement with Housing Officers. These plots could be allocated as self-build for a period of 12 months (or as agreed with the LPA). If there is no interest following the expiry of this time period, then the developer would reserve the right to build these out for market sale. This arrangement would not reduce the provision of affordable housing on site as this would be calculated including the self-build plots. The details, trigger points and fall back positions would be agreed through a S106 agreement with the Council.

The Planning Balance

- 8.96 The above chapter has set out the principle of the development and interrogated the relevant policies and material considerations. The overarching planning argument is based on the following factors:
1. Broughton as a settlement has changed considerably since the adoption of the Development Plan. It now, more than ever, represents a sustainable location for growth and this has been confirmed by the Inspector and the Council themselves. No capacity issues exist.
 2. Whilst Broughton is at the lower end of the settlement hierarchy (in the adopted Local Plan), as set out in point 1, it still constitutes an appropriate location for some growth. Furthermore, other settlements within the same classification have undergone considerable growth and expansion over the plan period suggesting that the hierarchy does not reflect the current situation. Indeed, the settlement boundaries themselves have become superseded by events.
 3. Preston City Council have themselves acknowledged the changing nature of Broughton, and the capacity to accommodate growth through the promotion of Broughton in the settlement hierarchy to Local or Rural Centre in the Emerging Local Plan. Furthermore, the proposed allocation of 110 homes demonstrates the need for residential development in Preston and the ability of Broughton to accommodate such growth. The proposed development is for just 51 dwellings on a well-contained site close to services and facilities.
 4. The growth experienced within Broughton has overtaken all other settlements studied, suggesting that the town better represents a higher order settlement.
 5. The proposed development would not have any impact on the area of separation or the open countryside as agreed by the Council and statutory consultees.
 6. Using the Neighbourhood Plan narrative, the site would follow the same logic that was used by the Parish to allocate sites for development given its minimal impact on the area of separation and the 'rounding off' of the settlement boundary.
 7. Notwithstanding Policy 1 of the Core Strategy, there are limited opportunities for development where it responds to an identified need.

8. The proposed development has been amended to incorporate specific accommodation types which respond to the localised need for affordable products, housing for the over 55's, accessible and adaptable wheelchair units and self-build plots.
- 8.97 Considering the above, it is necessary to weigh up the 'planning balance' of the proposed development in line with the NPPF guidance. It is noted that a full overview of the technical elements of the scheme are provided in the following section. However, as these exactly follow the previous submission, all conclusions reached by the statutory consultees through the determination of application 06/2021/1104 stand true and are material considerations.
- 8.98 It has been demonstrated through this application and the documentation that the only 'harm' arising from the development in the view of the Council is the location of the development in line with Policy 1 of the Core Strategy. We have set out a strong and compelling argument through this statement to challenge this view and suggest that even though the settlement hierarchy directs growth elsewhere, this site, and Broughton as a whole, still reflects a sustainable location for a housing development.
- 8.99 We have demonstrated that whilst the development would be outside the settlement boundary, given the changing context since the drawing of the boundary, the scheme would not cause a major extension, and would instead 'infill' the southern arc of development which has been created by appeal decisions at Sandy Bank Lane and Key Fold Farm.
- 8.100 Furthermore, it has been accepted by the Local Authority that the proposals would have no impact on the area of separation. We have challenged the impact that the scheme would have on the 'open countryside' and whether this nomenclature is even appropriate given the changing context of Broughton and the site vicinity.
- 8.101 The revised scheme has been amended in direct response to a localised need of affordable housing, accommodation for over 55's, adaptable and accessible wheelchair units and self-build plots. All of these tenures have been demonstrated to have an acute (and growing need) within Preston. Amending the scheme to respond to such localised need thus complies with the clauses of Policy 1 of the Core Strategy and indeed is the emerging policy direction which can be given some weight.
- 8.102 On balance, it is our firm view that the proposed development delivers substantial public benefit which outweighs the limited harm arising from the location of the development (a position which we have challenged throughout this statement). The specific circumstances applicable to the proposals are unique and specific to the site, particularly given the changing context around the site, the proposed housing offer, as well as there being no technical issues arising in which to prevent development.
- 8.103 Given the benefits arising, and the material considerations set out in this statement, it is our view that the development is sustainable and meets the aspirations of the Development Plan. On this basis, it is our view that the benefits arising from the development should warrant planning permission being granted.

9. Technical Assessment

- 9.1 The following section of this statement sets out the technical assessment of the proposals in line with the relevant planning policies and guidance. It acknowledges the positions agreed with the statutory consultees through application 06/2021/1104 and confirms if/what planning conditions the applicant would be willing to accept.

Ecology and Biodiversity Net Gain

- 9.2 Through the preparation of application 06/2021/1104, ERAP prepared an ecological assessment and accompanying Biodiversity Net Gain Assessment. The report was reviewed in December 2022 to ensure an up to date position was provided for this revised submission.
- 9.3 The reports found that the site was a suitable location for development, and subject to the appropriate implementation of the landscape and ecological management tools, a biodiversity net gain of 33.34% for habitats and 10.44% for hedgerows could be achieved.
- 9.4 This was reviewed by GMEU and Natural England through the consideration of the original application and no objections were made. GMEU requested conditions relating to tree protection measures, external lighting, vegetation clearance (and timing of this), and Amphibian Reasonable Avoidance Measures as well as submission of biodiversity enhancement measures. Hollins Strategic Land accept the appropriate wording of these conditions.
- 9.5 **On this basis, it is considered there are no ecological reasons why planning permission should not be granted.**

Flood Risk and Drainage

- 9.6 Enzygo prepared a flood risk assessment (FRA) to support the previous application.
- 9.7 Their report concluded that the site is within Flood Zone 1 and the risk of flooding (both on site, and elsewhere as a result of the development) is low.
- 9.8 The report considered the potential impact of development on surface water runoff rates, given the increase in impermeable areas post development. These rates were calculated and considered acceptable subject to installing appropriate attenuation facilities.
- 9.9 As part of the original application, comments were made by the LLFA. They raised no objections subject to the application of conditions which require the submission of detailed SUDs design. The applicant will accept a suitably worded condition to secure this detail.
- 9.10 **On this basis, it is considered there are no flood risk or drainage reasons why planning permission should not be granted.**

Ground Conditions

- 9.11 Brownfield Solutions prepared a Phase 1 site investigations report to support the original application. This report identified two potential contamination sources on site; a

potentially infilled pond and an electricity substation. There was also one off-site source of more potentially infilled ponds and a pump.

- 9.12 From the assessment it was concluded that the risk to human health is moderate to low and the risk to controlled waters is low.
- 9.13 Environmental Health confirmed this and raised no objection subject to the conditioning of a Phase 2 assessment. Hollins Strategic Land accept the appropriate wording of these conditions.
- 9.14 **On this basis, it is considered there are no ground contamination reasons why planning permission should not be granted.**

Heritage

- 9.15 To support the application, Kathryn Sather Associates (KSA) prepared a heritage assessment given the location of nearby listed buildings. The assets, (Grade II listed Bank Hall/Bank Hall Farm and the War Memorial at Pinfold) were considered to have a medium level of significance.
- 9.16 The proposed development and the siting of its built element, with significant open space and landscaping buffers along the south, does not form a part of any significant views of the assets. The proposed development constitutes a negligible magnitude of change to the heritage assets.
- 9.17 Following the heritage assessment methodology, the significance of a change of a negligible magnitude to a heritage asset of medium value would constitute a neutral/slight impact, which could be either adverse or beneficial. Overall, the heritage statement concludes that the proposed development would have a neutral impact on the setting of the heritage assets.
- 9.18 **On the basis of the above, there is no heritage or conservation reason which would mean that planning permission cannot be granted.**

Landscape and Visual Impact

- 9.19 SLR prepared a Landscape and Visual Impact Assessment (LVIA) to support the original application.
- 9.20 The Landscape Strategy for Lancashire classifies the site, and land to the north, south and west of the site, as part of 'The Flyde'. The site does not strongly align with many of the key characteristics as the recently consented residential developments make the landscape more influenced by urban features. The appraisal has concluded that the landscape effects resulting from the proposed development would be highly localised and no higher than moderate. Negative effects would be limited to the site itself. All other effects on character outside of the site would be neutral in nature.
- 9.21 The effects on the landscape character areas in the locality of the site would be negligible and neutral overall, since the site is already characterised by residential development and effects would be predominantly localised as existing and consented residential development, along with existing and proposed vegetation, would mostly screen the development.
- 9.22 The effects on the landscape character areas in the locality of the site would be no more than minor or neutral, since the landscape is already characterised by residential development and effects would be localised as existing and proposed vegetation,

along with existing and consented residential development, would mostly screen the proposed development. Of the viewpoints studied, the development would be not visible from 5 (of the 15 viewpoints) in year 1 and by year 15, the development would not be visible from 8 of the viewpoints.

- 9.23 The visibility of the site by pedestrians and cyclists in year 1 would be major/moderate but the proposed landscaping would provide high levels of coverage to the site.
- 9.24 Overall, the impact of the proposed development on the surrounding landscape was considered to be acceptable recognising the low resultant impact. This was confirmed by the Council's landscape officer through the determination of the previous application as they raised no objections to the proposals.
- 9.25 Overall, there is no landscape and visual reason why planning permission should not be granted.

Highways

- 9.26 As part of the previous application, Stantec undertook a transport assessment to support the submission, this has been reviewed and updated as necessary to support this re-submission. As part of their assessment, they reviewed the accident records and collision data. The data found that over the 5 year period from 2016 to 2020, there was not an inherent highway safety concern regarding the existing highway network.
- 9.27 As part of the proposed development, vehicular, pedestrian and cycle access to the site would be taken from Garstang Road. The proposed access will be a simple priority junction on Garstang Road located on the eastern boundary of the site. It has been demonstrated that the requisite visibility splays can be achieved, and the access can be developed in line with the technical standards.
- 9.28 The proposed parking will be in line with the Preston City Council's Local Plan. The details of this would be secured through a forthcoming reserved matters application.
- 9.29 In terms of trip generation, the survey work undertaken by Stantec confirmed that the proposed development would only generate 30 trips would be generated during a weekday morning and 35 trips would be generated at a weekday evening at peak hour. This level of trip generation would have no material impact on the existing highway.
- 9.30 The proposed highway arrangements and resultant impact of the development were reviewed by the County Highways department through the consideration of the previous application.
- 9.31 As part of their comments, County Highways initially raised concerns around the proposed development and requested further information to confirm the safe and suitable access to the site.
- 9.32 Through the consideration of the application, the applicant provided further justification and survey work which led County Highways to withdraw their objection. Following the withdrawal, County Highways accepted the proposed development subject to the application of suitable conditions. Furthermore, Highways England requested a Travel Plan was conditioned as part of any consent.
- 9.33 The applicant will accept the appropriately worded conditions meaning there is no highways related reason why planning permission cannot be granted.

Trees

- 9.34 To support the application, AWA Tree Consultants undertook a condition survey of the site to understand if/what tree constraints were present at the site. The tree survey took place during May 2021. The trees were surveyed visually from the ground using "Visual Tree Assessment" techniques and in accordance with the guiding principles of British Standard 5837:2012. Any additional off-site trees that could impact a new development design have been included in the tree survey parameters.
- 9.35 The tree survey revealed 49 items of woody vegetation, comprised of 36 individual trees and 13 groups of trees or hedges. Significant tree cover is comprised of the large mature trees situated in and adjacent to the boundary hedges. As the surveyed area is a managed farm field, there is nothing of arboricultural significance in the central areas of the site.
- 9.36 The report found that species diversity is reasonable. The dominant species is Oak, with occasional Sycamore, Lime and one Walnut. The boundary hedge groups are predominantly comprised of Hawthorn, with occasional Ash, Blackthorn, Elder and Holly. There was good age diversity, with a mix of semi-mature trees and hedges and mature trees. The tree Root Protection Area (RPA) for each tree has been plotted as a polygon centred on the base of the stem.
- 9.37 The Greater Manchester Ecology Unit (GMEU) raised no objections in relation to trees, subject to appropriate conditions securing the tree removal details.
- 9.38 On the basis of the above, there is no arboricultural reason why planning permission should not be granted.

Education

- 9.39 Whilst no report was submitted as part of the original application, the Council's education consultees requested S106 payments to contribute to school places arising from the development.
- 9.40 They suggested that the development would need to contribute towards 19 primary school places and 8 secondary school places. This was on the basis of all 51 units being 4 bedrooms. Given this is an outline application and the exact residential mix is not known and recognising the change in tenure as proposed by this revised submission, Hollins Strategic Land will engage with the LPA and the education department to secure an appropriate S106 obligation through the determination of the application.
- 9.41 On the basis of an appropriate s106 obligation being secured, there should be no reasons relating to education why planning permission cannot be granted.

10. Conclusion

- 10.1 This planning statement has been prepared on behalf of Hollins Strategic Land to support the revised submission for proposed development on land to the west of Garstang Road. This application follows the refusal of planning permission in January 2022 (reference 06/2021/1104) for:

Outline planning application seeking approval for access only for residential development for up to 51no. dwellings (including affordable housing, First Homes, accommodation for over 55's, accessible and adaptable wheelchair units and self-build plots) with associated works (all other matters reserved)

- 10.2 The revised application is submitted within the 12 months following the initial decision, therefore qualifying for the 'free go'¹¹ (as established under paragraph 40 of the Planning Application Fees guidance).

- 10.3 In their consideration of the previous application, the Council refused the scheme on the basis that Broughton was a lower order settlement and was not an identified area for growth as set out in the Central Lancashire Local Plan. Preston's reason for refusal was:

The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood Development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.

- 10.4 This revised application relies upon agreed parameters and technical agreements and provides a more varied housing offer which further increases the accruable benefits of the scheme.

- 10.5 This statement has set out how Broughton as a settlement is changing and has grown considerably since its original 'nuclei'. Data confirms that over 1,300 new homes have been approved in the Broughton parish area since the Development Plan was adopted. This is the highest level of growth of any of the other settlements identified in the settlement hierarchy. The data, coupled with the confirmation by Inspector Manning through the determination of the Sandy Gate Lane appeal, confirms that Broughton as a settlement is a sustainable location for growth.

- 10.6 It has been demonstrated that the proposed development would have no impact on the Area of Separation, or the surrounding landscape (and this is accepted by the Council through their previous assessment of the proposals). Furthermore, the criteria set out by the Neighbourhood Plan, in our view applies here. In the Neighbourhood

¹¹ <https://www.gov.uk/guidance/fees-for-planning-applications>

Plan, they state that the allocated sites would cause a limited impact on the countryside and would 'round off' the settlement boundary. We note that this site is not allocated under the Neighbourhood Plan, however, we have presented maps and evidence to confirm that the same site selection objectives can be made with this application site, and therefore the location of development is suitable and acceptable.

- 10.7 A detailed assessment of the localised need has been undertaken to understand how the scheme can best respond to local requirements. As such, the amended proposals include affordable housing (noting the acute need for rented tenures across Preston), accommodation for the over 55's (again recognising the specific need and the growing ageing population), and self-build plots. The amended proposals also positively respond to the latest evidence on BAME households and wheelchair users. These factors combine to present a development scheme which responds to a specific and identified local need as required by Policy 1 of the Core Strategy and EN1 of the Local Plan.
- 10.8 The baseline technical assessment work remains consistent with the previous application. As such, the conclusions that were made by the consultees through the consideration of the previous application stand true and constitute material considerations. On this basis, there are no technical reasons which would generate significant harm capable of outweighing the planning benefit of the scheme.
- 10.9 Overall, the revised submission has directly responded to the reason for refusal and identified specific areas of acute need within Preston. The scheme seeks to reduce perceived harm identified by the Council and promote benefits due to the proposed accommodation provision.
- 10.10 Given the benefits arising, and the material considerations set out in this statement, it is our view that the development is sustainable and meets the aspirations of the Development Plan. On this basis, it is our view that the benefits arising from the development should warrant planning permission being granted.

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

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APPENDIX 15:

Central Lancashire Part 1 Preferred Options – Settlement Hierarchy

Spatial Strategy

Table 1: Settlement Hierarchy

Tier 1 Preston Main Urban Area			
a) City Centre, including land within and adjoining:			
i. Stoneygate	ii. Station Quarter	iii. Harris Quarter	iv. University of Central Lancashire (main campus)
b) Inner Urban Neighbourhoods			
c) Northern Preston, including land within or adjacent to:			
i. Cottam	ii. North West Preston	iii. West Preston	
Tier 2 South Ribble and Chorley Main Urban Areas			
Land within or adjacent to Leyland - Chorley - Farington - Farington Moss - Midge Hall - Moss Side Penwortham - Lostock Hall - Bamber Bridge - Walton-le-Dale			
Tier 3 District Centres			
Land within or adjacent to:			
a) Adlington b) Euxton c) Longridge d) Longton e) Clayton Brook/Green f) Whittle-le-Woods g) Buckshaw Village h) Clayton-le-Woods i) Coppull			
Tier 4 Local and Rural Centres			
Land within or adjacent to:			
a) Higher Walton b) New Longton -c) Walmer Bridge d) Croston e) Eccleston f) Hutton g) Broughton h) Grimsargh			
Tier 5 Smaller Rural Villages and Hamlets			
Land within or adjacent to:			
a) Coupe Green b) Much Hoole c) Mellor Brook d) Barton e) Goosnargh f) Lea Town g) Woodplumpton h) Abbey Village i) Bretherton j) Brindle k) Charnock Richard l) Gib Lane m) Higher Wheelton n) Hoghton o) Brinscall/Withnell p) Gregson Lane q) Mawdesley r) Wheelton			

APPENDIX 16:

**Craighead in Tesco Stores Ltd. v Dundee City Council [2012] UKSC 13; [2012] 2
P. & C.R. 9**



Hilary Term
[2012] UKSC 13
On appeal from: [2011] CSIH 9

JUDGMENT

Tesco Stores Limited (Appellants) v Dundee City Council (Respondents) (Scotland)

before

Lord Hope, Deputy President
Lord Brown
Lord Kerr
Lord Dyson
Lord Reed

JUDGMENT GIVEN ON

21 March 2012

Heard on 15 and 16 February 2012

Appellants
Martin Kingston QC
Jane Munro
(Instructed by Semple
Fraser LLP)

Respondents
Douglas Armstrong QC
James Findlay QC
(Instructed by Gillespie
Macandrew LLP)

*Interveners (Asda Stores
Limited and MacDonald
Estates Group PLC)*
Malcolm Thomson QC
Kenny McBrearty
(Instructed by Brodies
LLP)

LORD REED (with whom Lord Brown, Lord Kerr and Lord Dyson agree)

1. If you drive into Dundee from the west along the A90 (T), you will pass on your left a large industrial site. It was formerly occupied by NCR, one of Dundee's largest employers, but its factory complex closed some years ago and the site has lain derelict ever since. In 2009 Asda Stores Ltd and MacDonald Estates Group plc, the interveners in the present appeal, applied for planning permission to develop a superstore there. Dundee City Council, the respondents, concluded that a decision to grant planning permission would not be in accordance with the development plan, but was nevertheless justified by other material considerations. Their decision to grant the application is challenged in these proceedings by Tesco Stores Ltd, the appellants, on the basis that the respondents proceeded on a misunderstanding of one of the policies in the development plan: a misunderstanding which, it is argued, vitiated their assessment of whether a departure from the plan was justified. In particular, it is argued that the respondents misunderstood a requirement, in the policies concerned with out of centre retailing, that it must be established that no suitable site is available, in the first instance, within and thereafter on the edge of city, town or district centres.

The legislation

2. Section 37(2) of the Town and Country Planning (Scotland) Act 1997, as in force at the time of the relevant decision, provides:

“In dealing with [an application for planning permission] the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations.”

Section 25 provides:

“Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise –

(a) to be made in accordance with that plan...”

The development plan

3. The development plan in the present case is an “old development plan” within the meaning of paragraph 1 of Schedule 1 to the 1997 Act. As such, it is defined by section 24 of the 1997 Act, as that section applied before the coming into force of section 2 of the Planning Etc. (Scotland) Act 2006, as including the approved structure plan and the adopted or approved local plan. The relevant structure plan in the present case is the Dundee and Angus Structure Plan, which became operative in 2002, at a time when the NCR plant remained in operation. As is explained in the introduction to the structure plan, its purpose is to provide a long term vision for the area and to set out the broad land use planning strategy guiding development and change. It includes a number of strategic planning policies. It sets the context for local plans, which translate the strategy into greater detail. Its preparation took account of national planning policy guidelines.

4. The structure plan includes a chapter on town centres and retailing. The introduction explains that the relevant Government guidance is contained in National Planning Policy Guidance 8, *Town Centres and Retailing* (revised 1998). I note that that document (NPPG 8) was replaced in 2006 by *Scottish Planning Policy: Town Centres and Retailing* (SPP 8), which was in force at the time of the decision under challenge, and which was itself replaced in 2010 by *Scottish Planning Policy* (SPP). The relevant sections of all three documents are in generally similar terms. The structure plan continues, at para 5.2:

“A fundamental principle of NPPG 8 is that of the sequential approach to site selection for new retail developments ... On this basis, town centres should be the first choice for such developments, followed by edge of centre sites and, only after this, out of centre sites which are currently or potentially accessible by different means of transport.”

In relation to out of centre developments, that approach is reflected in Town Centres and Retailing Policy 4: Out of Centre Retailing:

“In keeping with the sequential approach to site selection for new retail developments, proposals for new or expanded out of centre retail developments in excess of 1000 sq m gross will only be acceptable where it can be established that:

- no suitable site is available, in the first instance, within and thereafter on the edge of city, town or district centres;
- individually or cumulatively it would not prejudice the vitality and viability of existing city, town or district centres;
- the proposal would address a deficiency in shopping provision which cannot be met within or on the edge of the above centres;
- the site is readily accessible by modes of transport other than the car;
- the proposal is consistent with other Structure Plan policies.”

5. The relevant local plan is the Dundee Local Plan, which came into operation in 2005, prior to the closure of the NCR plant. Like the structure plan, it notes that national planning policy guidance emphasises the need to protect and enhance the vitality and viability of town centres. It continues, at para 52.2:

“As part of this approach planning authorities should adopt a sequential approach to new shopping developments with first preference being town centres, which in Dundee’s case are the City centre and the District Centres.”

That approach is reflected in Policy 45: Location of New Retail Developments:

“The City Centre and District Centres will be the locations of first choice for new or expanded retail developments not already identified in the Local Plan. Proposals for retail developments outwith these locations will only be acceptable where it can be established that:

- a) no suitable site is available, in the first instance, within and thereafter on the edge of the City Centre or District Centres; and

- b) individually or cumulatively it would not prejudice the vitality and viability of the City Centre or District Centres; and
- c) the proposal would address a deficiency in shopping provision which cannot be met within or on the edge of these centres; and
- d) the site is readily accessible by modes of transport other than the car; and
- e) the proposal is consistent with other Local Plan policies.”

6. It is also relevant to note the guidance given in NPPG 8, as revised in 1998, to which the retailing sections of the structure plan and the local plan referred. Under the heading “Sequential Approach”, the guidance stated:

“12. Planning authorities and developers should adopt a sequential approach to selecting sites for new retail, commercial leisure developments and other key town centre uses ... First preference should be for town centre sites, where sites or buildings suitable for conversion are available, followed by edge-of-centre sites, and only then by out-of-centre sites in locations that are, or can be made easily accessible by a choice of means of transport ...

13. In support of town centres as the first choice, the Government recognises that the application of the sequential approach requires flexibility and realism from developers and retailers as well as planning authorities. In preparing their proposals developers and retailers should have regard to the format, design, scale of the development, and the amount of car parking in relation to the circumstances of the particular town centre. In addition they should also address the need to identify and assemble sites which can meet not only their requirements, but in a manner sympathetic to the town setting. As part of such an approach, they should consider the scope for accommodating the proposed development in a different built form, and where appropriate adjusting or sub-dividing large proposals, in order that their scale might offer a better fit with existing development in the town centre ...

14. Planning authorities should also be responsive to the needs of retailers and other town centre businesses. In consultation with the private sector, they should assist in identifying sites in the town

centre which could be suitable and viable, for example, in terms of size and siting for the proposed use, and are likely to become available in a reasonable time ...

15. Only if it can be demonstrated that all town centre options have been thoroughly addressed and a view taken on availability, should less central sites in out-of-centre locations be considered for key town centre uses. Where development proposals in such locations fall outwith the development plan framework, it is for developers to demonstrate that town centre and edge-of-centre options have been thoroughly assessed. Even where a developer, as part of a sequential approach, demonstrates an out-of-centre location to be the most appropriate, the impact on the vitality and viability of existing centres still has to be shown to be acceptable ...”

The consideration of the application

7. The interveners’ application was for planning permission to develop a foodstore, café and petrol filling station, with associated car parking, landscaping and infrastructure, including access roads. The proposals also involved improvements to the junction with the A90 (T), the upgrading of a pedestrian underpass, the provision of footpaths and cycle ways, and improvements to adjacent roadways. A significant proportion of the former NCR site lay outside the application site. It was envisaged that vehicular access to this land could be achieved using one of the proposed access roads.

8. In his report to the respondents, the Director of City Development advised that the application was contrary to certain aspects of the employment and retailing policies of the development plan. In relation to the employment policies, in particular, the proposal was contrary to policies which required the respondents to safeguard the NCR site for business use. The Director considered however that the application site was unlikely to be re-developed for business uses in the short term, and that its re-development as proposed would improve the development prospects of the remainder of the NCR site. In addition, the infrastructure improvements would provide improved access which would benefit all businesses in an adjacent industrial estate.

9. In relation to the retailing policies, the Director considered the application in the light of the criteria in Retailing Policy 4 of the structure plan. In relation to the first criterion he stated:

“It must be demonstrated, in the first instance, that no suitable site is available for the development either within the city/district centres or, thereafter on the edge of these centres ... While noting that the Lochee District Centre lies within the primary catchment area for the proposal, [the retail statement submitted on behalf of the interveners] examines the potential site opportunities in and on the edge of that centre and also at the Hilltown and Perth Road District Centres. The applicants conclude that there are no sites or premises available in or on the edge of existing centres capable of accommodating the development under consideration. Taking account of the applicant’s argument it is accepted that at present there is no suitable site available to accommodate the proposed development.”

In relation to the remaining criteria, the Director concluded that the proposed development was likely to have a detrimental effect on the vitality and viability of Lochee District Centre, and was therefore in conflict with the second criterion. The potential impact on Lochee could however be minimised by attaching conditions to any permission granted so as to restrict the size of the store, limit the type of goods for sale and prohibit the provision of concessionary units. The proposal was also considered to be in conflict with the third criterion: there was no deficiency in shopping provision which the proposal would address. The fourth criterion, concerned with accessibility by modes of transport other than the car, was considered to be met. Similar conclusions were reached in relation to the corresponding criteria in Policy 45 of the local plan.

10. In view of the conflict with the employment and retailing policies, the Director considered that the proposal did not fully comply with the provisions of the development plan. He identified however two other material considerations of particular significance. First, the proposed development would bring economic benefits to the city. The closure of the NCR factory had been a major blow to the economy, but the re-development of the application site would create more jobs than had been lost when the factory finally closed. The creation of additional employment opportunities within the city was considered to be a strong material consideration. Secondly, the development would also provide a number of planning benefits. There would be improvements to the strategic road network which would assist in the free flow of traffic along the A90 (T). The development would also assist in the re-development of the whole of the former NCR site through the provision of enhanced road access and the clearance of buildings from the site. The access improvements would also assist in the development of an economic development area to the west. These benefits were considered to be another strong material consideration.

11. The Director concluded that the proposal was not in accordance with the development plan, particularly with regard to the employment and retailing

policies. There were however other material considerations of sufficient weight to justify setting aside those policies and offering support for the development, subject to suitable conditions. He accordingly recommended that consent should be granted, subject to specified conditions.

12. The application was considered by the respondents' entire council sitting as the respondents' Development Quality Committee. After hearing submissions on behalf of the interveners and also on behalf of the appellants, the respondents decided to follow the Director's recommendation. The reasons which they gave for their decision repeated the Director's conclusions:

“It is concluded that the proposal does not undermine the core land use and environmental strategies of the development plan. The planning and economic benefits that would accrue from the proposed development would be important to the future development and viability of the city as a regional centre. These benefits are considered to be of a significant weight and sufficient to set aside the relevant provisions of the development plan.”

The present proceedings

13. The submissions on behalf of the appellants focused primarily upon an alleged error of interpretation of the first criterion in Retailing Policy 4 of the structure plan, and of the equivalent criterion in Policy 45 of the local plan. If there was a dispute about the meaning of a development plan policy which the planning authority was bound to take into account, it was for the court to determine what the words were capable of meaning. If the planning authority attached a meaning to the words which they were not properly capable of bearing, then it made an error of law, and failed properly to understand the policy. In the present case, the Director had interpreted “suitable” as meaning “suitable for the development proposed by the applicant”; and the respondents had proceeded on the same basis. That was not however a tenable meaning. Properly interpreted, “suitable” meant “suitable for meeting identified deficiencies in retail provision in the area”. Since no such deficiency had been identified, it followed on a proper interpretation of the plan that the first criterion did not require to be considered: it was inappropriate to undertake the sequential approach. The Director's report had however implied that the first criterion was satisfied, and that the proposal was to that extent in conformity with the sequential approach. The respondents had proceeded on that erroneous basis. They had thus failed to identify correctly the extent of the conflict between the proposal and the development plan. In consequence, their assessment of whether other material considerations justified a departure from the plan was inherently flawed.

14. The respondents had compounded their error, it was submitted, by treating the proposed development as definitive when assessing whether a “suitable” site was available. That approach permitted developers to drive a coach and horses through the sequential approach: they could render the policy nugatory by the simple expedient of putting forward proposals which were so large that they could only be accommodated outside town and district centres. In the present case, there was a site available in Lochee which was suitable for food retailing and which was sequentially preferable to the application site. The Lochee site had been considered as part of the assessment of the proposal, but had been found to be unsuitable because it could not accommodate the scale of development to which the interveners aspired.

15. In response, counsel for the respondents submitted that it was for the planning authority to interpret the relevant policy, exercising its planning judgment. Counsel accepted that, if there was a dispute about the meaning of the words in a policy document, it was for the court to determine as a matter of law what the words were capable of meaning. The planning authority would only make an error of law if it attached a meaning to the words which they were not capable of bearing. In the present case, the relevant policies required all the specified criteria to be satisfied. The respondents had proceeded on the basis that the proposal failed to accord with the second and third criteria. In those circumstances, the respondents had correctly concluded that the proposal was contrary to the policies in question. How the proposal had been assessed against the first criterion was immaterial.

16. So far as concerned the assessment of “suitable” sites, the interveners’ retail statement reflected a degree of flexibility. There had been a consideration of all sites of at least 2.5 ha, whereas the application site extended to 6.68 ha. The interveners had also examined sites which could accommodate only food retailing, whereas their application had been for both food and non-food retailing. The Lochee site extended to only 1.45 ha, and could accommodate a store of only half the size proposed. It also had inadequate car parking. The Director, and the respondents, had accepted that it was not a suitable site for these reasons.

Discussion

17. It has long been established that a planning authority must proceed upon a proper understanding of the development plan: see, for example, *Gransden & Co Ltd v Secretary of State for the Environment* (1985) 54 P & CR 86, 94 per Woolf J, affd (1986) 54 P & CR 361; *Horsham DC v Secretary of State for the Environment* (1991) 63 P & CR 219, 225-226 per Nolan LJ. The need for a proper understanding follows, in the first place, from the fact that the planning authority is required by statute to have regard to the provisions of the development plan: it

cannot have regard to the provisions of the plan if it fails to understand them. It also follows from the legal status given to the development plan by section 25 of the 1997 Act. The effect of the predecessor of section 25, namely section 18A of the Town and Country (Planning) Scotland Act 1972 (as inserted by section 58 of the Planning and Compensation Act 1991), was considered by the House of Lords in the case of *City of Edinburgh Council v Secretary of State for Scotland* 1998 SC (HL) 33, [1997] 1 WLR 1447. It is sufficient for present purposes to cite a passage from the speech of Lord Clyde, with which the other members of the House expressed their agreement. At p 44, 1459, his Lordship observed:

“In the practical application of sec 18A it will obviously be necessary for the decision-maker to consider the development plan, identify any provisions in it which are relevant to the question before him and make a proper interpretation of them. His decision will be open to challenge if he fails to have regard to a policy in the development plan which is relevant to the application or fails properly to interpret it.”

18. In the present case, the planning authority was required by section 25 to consider whether the proposed development was in accordance with the development plan and, if not, whether material considerations justified departing from the plan. In order to carry out that exercise, the planning authority required to proceed on the basis of what Lord Clyde described as “a proper interpretation” of the relevant provisions of the plan. We were however referred by counsel to a number of judicial dicta which were said to support the proposition that the meaning of the development plan was a matter to be determined by the planning authority: the court, it was submitted, had no role in determining the meaning of the plan unless the view taken by the planning authority could be characterised as perverse or irrational. That submission, if correct, would deprive sections 25 and 37(2) of the 1997 Act of much of their effect, and would drain the need for a “proper interpretation” of the plan of much of its meaning and purpose. It would also make little practical sense. The development plan is a carefully drafted and considered statement of policy, published in order to inform the public of the approach which will be followed by planning authorities in decision-making unless there is good reason to depart from it. It is intended to guide the behaviour of developers and planning authorities. As in other areas of administrative law, the policies which it sets out are designed to secure consistency and direction in the exercise of discretionary powers, while allowing a measure of flexibility to be retained. Those considerations point away from the view that the meaning of the plan is in principle a matter which each planning authority is entitled to determine from time to time as it pleases, within the limits of rationality. On the contrary, these considerations suggest that in principle, in this area of public administration as in others (as discussed, for example, in *R (Raissi) v Secretary of State for the Home Department* [2008] QB 836), policy statements should be interpreted

objectively in accordance with the language used, read as always in its proper context.

19. That is not to say that such statements should be construed as if they were statutory or contractual provisions. Although a development plan has a legal status and legal effects, it is not analogous in its nature or purpose to a statute or a contract. As has often been observed, development plans are full of broad statements of policy, many of which may be mutually irreconcilable, so that in a particular case one must give way to another. In addition, many of the provisions of development plans are framed in language whose application to a given set of facts requires the exercise of judgment. Such matters fall within the jurisdiction of planning authorities, and their exercise of their judgment can only be challenged on the ground that it is irrational or perverse (*Tesco Stores Ltd v Secretary of State for the Environment* [1995] 1 WLR 759, 780 per Lord Hoffmann). Nevertheless, planning authorities do not live in the world of Humpty Dumpty: they cannot make the development plan mean whatever they would like it to mean.

20. The principal authority referred to in relation to this matter was the judgment of Brooke LJ in *R v Derbyshire County Council, Ex p Woods* [1997] JPL 958 at 967. Properly understood, however, what was said there is not inconsistent with the approach which I have described. In the passage in question, Brooke LJ stated:

“If there is a dispute about the meaning of the words included in a policy document which a planning authority is bound to take into account, it is of course for the court to determine as a matter of law what the words are capable of meaning. If the decision maker attaches a meaning to the words they are not properly capable of bearing, then it will have made an error of law, and it will have failed properly to understand the policy.”

By way of illustration, Brooke LJ referred to the earlier case of *Northavon DC v Secretary of State for the Environment* [1993] JPL 761, which concerned a policy applicable to “institutions standing in extensive grounds”. As was observed, the words spoke for themselves, but their application to particular factual situations would often be a matter of judgment for the planning authority. That exercise of judgment would only be susceptible to review in the event that it was unreasonable. The latter case might be contrasted with the case of *R (Heath and Hampstead Society) v Camden LBC* [2008] 2 P & CR 233, where a planning authority’s decision that a replacement dwelling was not “materially larger” than its predecessor, within the meaning of a policy, was vitiated by its failure to understand the policy correctly: read in its context, the phrase “materially larger” referred to the size of the new building compared with its predecessor, rather than

requiring a broader comparison of their relative impact, as the planning authority had supposed. Similarly in *City of Edinburgh Council v Scottish Ministers* 2001 SC 957 the reporter's decision that a licensed restaurant constituted "similar licensed premises" to a public house, within the meaning of a policy, was vitiated by her misunderstanding of the policy: the context was one in which a distinction was drawn between public houses, wine bars and the like, on the one hand, and restaurants, on the other.

21. A provision in the development plan which requires an assessment of whether a site is "suitable" for a particular purpose calls for judgment in its application. But the question whether such a provision is concerned with suitability for one purpose or another is not a question of planning judgment: it is a question of textual interpretation, which can only be answered by construing the language used in its context. In the present case, in particular, the question whether the word "suitable", in the policies in question, means "suitable for the development proposed by the applicant", or "suitable for meeting identified deficiencies in retail provision in the area", is not a question which can be answered by the exercise of planning judgment: it is a logically prior question as to the issue to which planning judgment requires to be directed.

22. It is of course true, as counsel for the respondents submitted, that a planning authority might misconstrue part of a policy but nevertheless reach the same conclusion, on the question whether the proposal was in accordance with the policy, as it would have reached if it had construed the policy correctly. That is not however a complete answer to a challenge to the planning authority's decision. An error in relation to one part of a policy might affect the overall conclusion as to whether a proposal was in accordance with the development plan even if the question whether the proposal was in conformity with the policy would have been answered in the same way. The policy criteria with which the proposal was considered to be incompatible might, for example, be of less weight than the criteria which were mistakenly thought to be fulfilled. Equally, a planning authority might misconstrue part of a policy but nevertheless reach the same conclusion as it would otherwise have reached on the question whether the proposal was in accordance with the development plan. Again, however, that is not a complete answer. Where it is concluded that the proposal is not in accordance with the development plan, it is necessary to understand the nature and extent of the departure from the plan which the grant of consent would involve in order to consider on a proper basis whether such a departure is justified by other material considerations.

23. In the present case, the Lord Ordinary rejected the appellants' submissions on the basis that the interpretation of planning policy was always primarily a matter for the planning authority, whose assessment could be challenged only on the basis of unreasonableness: there was, in particular, more than one way in

which the sequential approach could reasonably be applied ([2010] CSOH 128, para 23). For the reasons I have explained, that approach does not correctly reflect the role which the court has to play in the determination of the meaning of the development plan. A different approach was adopted by the Second Division: since, it was said, the proposal was in head-on conflict with the retail and employment policies of the development plan, and the sequential approach offered no justification for it, a challenge based upon an alleged misapplication of the sequential approach was entirely beside the point (2011 SC 457, [2011] CSIH 9, para 38). For the reasons I have explained, however, even where a proposal is plainly in breach of policy and contrary to the development plan, a failure properly to understand the policy in question may result in a failure to appreciate the full extent or significance of the departure from the development plan which the grant of consent would involve, and may consequently vitiate the planning authority's determination. Whether there has in fact been a misunderstanding of the policy, and whether any such misunderstanding may have led to a flawed decision, has therefore to be considered.

24. I turn then to the question whether the respondents misconstrued the policies in question in the present case. As I have explained, the appellants' primary contention is that the word "suitable", in the first criterion of Retailing Policy 4 of the structure plan and the corresponding Policy 45 of the local plan, means "suitable for meeting identified deficiencies in retail provision in the area", whereas the respondents proceeded on the basis of the construction placed upon the word by the Director of City Development, namely "suitable for the development proposed by the applicant". I accept, subject to a qualification which I shall shortly explain, that the Director and the respondents proceeded on the latter basis. Subject to that qualification, it appears to me that they were correct to do so, for the following reasons.

25. First, that interpretation appears to me to be the natural reading of the policies in question. They have been set out in paras 4 and 5 above. Read short, Retailing Policy 4 of the structure plan states that proposals for new or expanded out of centre retail developments will only be acceptable where it can be established that a number of criteria are satisfied, the first of which is that "no suitable site is available" in a sequentially preferable location. Policy 45 of the local plan is expressed in slightly different language, but it was not suggested that the differences were of any significance in the present context. The natural reading of each policy is that the word "suitable", in the first criterion, refers to the suitability of sites for the proposed development: it is the proposed development which will only be acceptable at an out of centre location if no suitable site is available more centrally. That first reason for accepting the respondents' interpretation of the policy does not permit of further elaboration.

26. Secondly, the interpretation favoured by the appellants appears to me to conflate the first and third criteria of the policies in question. The first criterion concerns the availability of a “suitable” site in a sequentially preferable location. The third criterion is that the proposal would address a deficiency in shopping provision which cannot be met in a sequentially preferable location. If “suitable” meant “suitable for meeting identified deficiencies in retail provision”, as the appellants contend, then there would be no distinction between those two criteria, and no purpose in their both being included.

27. Thirdly, since it is apparent from the structure and local plans that the policies in question were intended to implement the guidance given in NPPG 8 in relation to the sequential approach, that guidance forms part of the relevant context to which regard can be had when interpreting the policies. The material parts of the guidance are set out in para 6 above. They provide further support for the respondents’ interpretation of the policies. Paragraph 13 refers to the need to identify sites which can meet the requirements of developers and retailers, and to the scope for accommodating the proposed development. Paragraph 14 advises planning authorities to assist the private sector in identifying sites which could be suitable for the proposed use. Throughout the relevant section of the guidance, the focus is upon the availability of sites which might accommodate the proposed development and the requirements of the developer, rather than upon addressing an identified deficiency in shopping provision. The latter is of course also relevant to retailing policy, but it is not the issue with which the specific question of the suitability of sites is concerned.

28. I said earlier that it was necessary to qualify the statement that the Director and the respondents proceeded, and were correct to proceed, on the basis that “suitable” meant “suitable for the development proposed by the applicant”. As paragraph 13 of NPPG 8 makes clear, the application of the sequential approach requires flexibility and realism from developers and retailers as well as planning authorities. The need for flexibility and realism reflects an inbuilt difficulty about the sequential approach. On the one hand, the policy could be defeated by developers’ and retailers’ taking an inflexible approach to their requirements. On the other hand, as Sedley J remarked in *R v Teesside Development Corporation, Ex p William Morrison Supermarket plc and Redcar and Cleveland BC* [1998] JPL 23, 43, to refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer. The guidance seeks to address this problem. It advises that developers and retailers should have regard to the circumstances of the particular town centre when preparing their proposals, as regards the format, design and scale of the development. As part of such an approach, they are expected to consider the scope for accommodating the proposed development in a different built form, and where appropriate adjusting or sub-dividing large proposals, in order that their scale may fit better with existing

development in the town centre. The guidance also advises that planning authorities should be responsive to the needs of retailers. Where development proposals in out-of-centre locations fall outside the development plan framework, developers are expected to demonstrate that town centre and edge-of-centre options have been thoroughly assessed. That advice is not repeated in the structure plan or the local plan, but the same approach must be implicit: otherwise, the policies would in practice be inoperable.

29. It follows from the foregoing that it would be an over-simplification to say that the characteristics of the proposed development, such as its scale, are necessarily definitive for the purposes of the sequential test. That statement has to be qualified to the extent that the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains, as Lord Glennie observed in *Lidl UK GmbH v Scottish Ministers* [2006] CSOH 165, para 14, whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.

30. In the present case, it is apparent that a flexible approach was adopted. The interveners did not confine their assessment to sites which could accommodate the development in the precise form in which it had been designed, but examined sites which could accommodate a smaller development and a more restricted range of retailing. Even taking that approach, however, they did not regard the Lochee site vacated by the appellants as being suitable for their needs: it was far smaller than they required, and its car parking facilities were inadequate. In accepting that assessment, the respondents exercised their judgment as to how the policy should be applied to the facts: they did not proceed on an erroneous understanding of the policy.

31. Finally, I would observe that an error by the respondents in interpreting their policies would be material only if there was a real possibility that their determination might otherwise have been different. In the particular circumstances of the present case, I am not persuaded that there was any such possibility. The considerations in favour of the proposed development were very powerful. They were also specific to the particular development proposed: on the information before the respondents, there was no prospect of any other development of the application site, or of any development elsewhere which could deliver equivalent planning and economic benefits. Against that background, the argument that a different decision might have been taken if the respondents had been advised that

the first criterion in the policies in question did not arise, rather than that criterion had been met, appears to me to be implausible.

Conclusion

32. For these reasons, and those given by Lord Hope, with which I am in entire agreement, I would dismiss the appeal.

LORD HOPE

33. The question that lies at the heart of this case is whether the respondents acted unlawfully in their interpretation of the sequential approach which both the structure plan and the relevant local plan required them to adopt to new retail developments within their area. According to that approach, proposals for new or expanded out of centre developments of this kind are acceptable only where it can be established, among other things, that no suitable site is available, in the first instance, within and thereafter on the edge of city, town or district centres. Is the test as to whether no suitable site is available in these locations, when looked at sequentially, to be addressed by asking whether there is a site in each of them in turn which is suitable for the proposed development? Or does it direct attention to the question whether the proposed development could be altered or reduced so as to fit into a site which is available there as a location for this kind of development?

34. The sequential approach is described in National Planning Policy Guidance Policy 8, *Town Centres and Retailing*, para 5.2 as a fundamental principle of NPPG 8. In *R v Rochdale Metropolitan Borough Council, Ex p Milne*, 31 July 2000, not reported, paras 48-49, Sullivan J said that it was not unusual for development plan policies to pull in different directions and, having regard to what Lord Clyde said about the practical application of the statutory rule in *City of Edinburgh v Secretary of State for Scotland* 1998 SC (HL) 33 at p 44, that he regarded as untenable the proposition that if there was a breach of any one policy in a development plan a proposed development could not be said to be “in accordance with the plan”. In para 52 he said that the relative importance of a given policy to the overall objectives of the development plan was essentially a matter for the judgment of the local planning authority and that a legalistic approach to the interpretation of development plan policies was to be avoided.

35. I see no reason to question these propositions, to which Mr Kingston QC for the appellants drew our attention in his reply to Mr Armstrong’s submissions for the respondents. But I do not think that they are in point in this case. We are concerned here with a particular provision in the planning documents to which the

respondents are required to have regard by the statute. The meaning to be given to the crucial phrase is not a matter that can be left to the judgment of the planning authority. Nor, as the Lord Ordinary put it in his opinion at [2010] CSOH 128, para 23, is the interpretation of the policy which it sets out primarily a matter for the decision maker. As Mr Thomson for the interveners pointed out, the challenge to the respondents' decision to follow the Director's recommendation and approve the proposed development is not that it was *Wednesbury* unreasonable but that it was unlawful. I agree with Lord Reed that the issue is one of law, reading the words used objectively in their proper context.

36. In *Lidl UK GmbH v The Scottish Ministers* [2006] CSOH 165 the appellants appealed against a decision of the Scottish Ministers to refuse planning permission for a retail unit to be developed on a site outwith Irvine town centre. The relevant provision in the local plan required the sequential approach to be adopted to proposals for new retail development out with the town centre boundaries. Among the criteria that had to be satisfied was the requirement that no suitable sites were available, or could reasonably be made available, in or on the edge of existing town centres. In other words, town centre sites were to be considered first before edge of centre or out of town sites. The reporter held that the existing but soon to be vacated Lidl town centre site was suitable for the proposed development, although it was clear as a matter of fact that this site could not accommodate it. In para 13 Lord Glennie noted that counsel for the Scottish Ministers accepted that a site would be "suitable" in terms of the policy only if it was suitable for, or could accommodate, the development as proposed by the developer. In para 14 he said that the question was whether the alternative town centre site was suitable for the proposed development, not whether the proposed development could be altered or reduced so that it could fit in to it.

37. Mr Kingston submitted that Lord Glennie's approach would rob the sequential approach of all its force, and in the Inner House it was submitted that his decision proceeded on a concession by counsel which ought not to have been made: [2011] CSIH 9, 2011 SC 457, para 31. But I think that Lord Glennie's interpretation of the phrase was sound and that counsel was right to accept that it had the meaning which she was prepared to give to it. The wording of the relevant provision in the local plan in that case differed slightly from that with which we are concerned in this case, as it included the phrase "or can reasonably be made available". But the question to which it directs attention is the same. It is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre.

38. The context in which the word "suitable" appears supports this interpretation. It is identified by the opening words of the policy, which refer to "proposals for new or expanded out of centre retail developments" and then set out

the only circumstances in which developments outwith the specified locations will be acceptable. The words “the proposal” which appear in the third and fifth of the list of the criteria which must be satisfied serve to reinforce the point that the whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is for something less than that sought by the developer. It is worth noting too that the phrase “no suitable site is available” appears in Policy 46 of the local plan relating to commercial developments. Here too the context indicates that the issue of suitability is directed to the developer’s proposals, not some alternative scheme which might be suggested by the planning authority. I do not think that this is in the least surprising, as developments of this kind are generated by the developer’s assessment of the market that he seeks to serve. If they do not meet the sequential approach criteria, bearing in mind the need for flexibility and realism to which Lord Reed refers in para 28, above, they will be rejected. But these criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so.

39. For these reasons which I add merely as a footnote I agree with Lord Reed, for all the reasons he gives, that this appeal should be dismissed. I would affirm the Second Division’s interlocutor.

APPENDIX 17:

Chichester DC v SoSHCLG [2019] EWCA Civ 1640



Neutral Citation Number: [2019] EWCA Civ 1640

Case No: C1/2018/2373

IN THE COURT OF APPEAL (CIVIL DIVISION)
ON APPEAL FROM THE ADMINISTRATIVE COURT
PLANNING COURT
UPPER TRIBUNAL JUDGE ANDREW GRUBB
(sitting as a deputy judge of the High Court)
[2018] EWHC 2386 (Admin)

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 9 October 2019

Before:

Lord Justice Lindblom
Lord Justice Baker
and
Sir Bernard Rix

Between:

Chichester District Council

Appellant

- and -

**(1) Secretary of State for Housing, Communities
and Local Government**
(2) Beechcroft Land Ltd.

Respondents

Mr Gwion Lewis (instructed by **Sharpe Pritchard LLP**) for the **Appellant**
Mr Guy Williams (instructed by **the Government Legal Department**)
for the **First Respondent**
Mr Killian Garvey (instructed by **Eversheds Sutherland**) for the **Second Respondent**

Hearing date: 23 July 2019

Judgment Approved by the court
for handing down
(subject to editorial corrections)

Lord Justice Lindblom:

Introduction

1. When does a proposal for housing development engage the policy in paragraph 198 of the National Planning Policy Framework of March 2012 (“the NPPF”) – that where an application for planning permission “conflicts” with a neighbourhood plan “... permission should not normally be granted”?
2. The appellant, Chichester District Council, appeals against the order dated 12 September 2018 of Upper Tribunal Judge Grubb, sitting as a deputy judge of the High Court, by which he dismissed its application under section 288 of the Town and Country Planning Act 1990 challenging the decision of an inspector appointed by the first respondent, the Secretary of State for Housing, Communities and Local Government (then the Secretary of State for Communities and Local Government), in a decision letter dated 2 November 2017, to allow an appeal by the second respondent, Beechcroft Land Ltd., under section 78 of the 1990 Act against the refusal on 8 February 2017 of an application for planning permission for up to 34 dwellings on land at Breach Avenue, Southbourne in East Sussex.
3. The site, once an orchard, is undeveloped land outside the settlement boundary of Southbourne defined in the Southbourne Parish Neighbourhood Plan 2015. The inspector found that the proposal was in conflict with two policies of the Chichester Local Plan Key Policies 2015 – Policy 2 and Policy 45 – and did not accord with the “aim” of the neighbourhood plan for the location of new housing, but that it would not conflict with the “policies” of the neighbourhood plan nor offend its purpose in restricting development north of the railway line, which was to avoid adding to congestion at the Stein Road level crossing. The district council could not demonstrate the five-year supply of housing land required by the policy in paragraph 47 of the NPPF. Applying the policy in paragraph 14 of the NPPF, the inspector concluded that the proposal benefited from the “presumption in favour of sustainable development”, which in his view overcame the conflict with the two local plan policies and with the aim of the neighbourhood plan for the location of new housing. He therefore allowed Beechcroft’s appeal. The judge rejected the argument that the inspector misapplied the policy in paragraph 198 of the NPPF, and therefore dismissed the section 288 application. I granted permission to appeal on 24 January 2019.

The issue in the appeal

4. The main issue in the single ground of appeal is whether the inspector erred in law in his understanding and application of the policy in paragraph 198, or by failing to apply it.

Section 38 of the Planning and Compulsory Purchase Act 2004

5. Section 38(3) of the Planning and Compulsory Purchase Act 2004 provides that “[for] the purposes of [any area of England other than Greater London] the development plan” includes “(b) the development plan documents (taken as a whole) which have been adopted or approved in relation to that area” and “(c) the neighbourhood development plans which have been made in relation to that area”. Subsection (5) requires any conflict between two policies of a development plan to be “resolved in favour of the policy ... contained in the last document to

become part of the development plan”. Under subsection (6), “[if] regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”. Section 38A(2) provides that “[a] “neighbourhood development plan” is a plan which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan”.

The policies in the NPPF

6. Under the heading “Neighbourhood plans”, paragraph 183 of the NPPF said that “[neighbourhood] planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need”, and “neighbourhood planning” could be used to “set planning policies through neighbourhood plans to determine decisions on planning applications”. Paragraphs 184 and 185 stated:

“184. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.

185. Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.”

7. The policy for “Determining applications” in paragraph 198 was this:

“198. Where a Neighbourhood Development Order has been made, a planning application is not required for development that is within the terms of the order. Where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted.”

8. The policies in paragraphs 183 to 185 and 198 were replaced in paragraphs 12, 28 to 30 and 52 of the replacement NPPF published in July 2018, and no further change was made in February 2019. Paragraph 12 of the February 2019 version says that “[where] a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted”.

The local plan

9. At the relevant time the development plan for Southbourne comprised the local plan, adopted in July 2015, and the neighbourhood plan, which was made in September 2015. The period of each plan runs to 2029.

10. In chapter 5 of the local plan, “Development and Settlement Hierarchy”, a “settlement hierarchy” is established for the district, as “the basis for the distribution of growth outlined in the strategy”: at the top, “Chichester City Sub-Regional Centre”, then “Settlement Hubs”, then “Service Villages”, then the “Rest of Plan Area” (paragraph 5.1). The plan “focuses the majority of development at Chichester city, Westhampnett and the Settlement Hubs of East Wittering/Bracklesham, Selsey, Southbourne and Tangmere” (paragraph 5.4). Paragraphs 5.5 and 5.6 state:

“5.5 All settlements classed in the hierarchy as Service Villages or above are defined by Settlement Boundaries. These boundaries indicate the areas where new development will generally be permitted, subject to satisfying other policies in the Plan. Settlement Boundaries have been carried forward from the Chichester District Local Plan 1999, but will be reviewed through Development Plan Documents and Neighbourhood Plans, taking account of the housing and development requirements identified elsewhere in this Plan.

5.6 The Rest of the Plan Area, defined as the areas outside defined Settlement Boundaries, is rural in character with many smaller villages, hamlets and scattered development along with open countryside. Therefore, development in the Rest of the Plan Area is subject to greater restrictions and limited primarily to that which requires a countryside location or meets an essential local rural need, supports rural diversification and sustainability of the countryside. More detailed policies relating to development in the Rest of the Plan Area are set out in the Strategic Delivery Policies and include Policy 45 Development in the Countryside and Policy 46 Alterations, Change of Use and/or Re-use of Existing Buildings in the Countryside.”

Paragraph 5.7 states that Policy 2 “sets out the settlement hierarchy” and that it “indicates the scale and type of development that will be provided in the different settlements”.

11. The relevant parts of Policy 2 are:

“Development Strategy and Settlement Hierarchy

The development strategy identifies the locations where sustainable development, infrastructure and facilities will be accommodated which in terms of scale, function and character support the role of the settlements outlined below. ...

...

Settlement Hubs ...

New development to meet identified local needs will reinforce the role of the Settlement Hubs as centres providing a range of homes, workplaces, social and community facilities (See Policies 18, 20, 23 and 24). ...

Strategic development locations are identified at:

- ...
- Southbourne, Selsey and East Wittering/Bracklesham in the form of medium-scale extensions (See Policies 20 and 23-24).
- ...

Service Villages ...

Outside of Chichester city and the Settlement Hubs, the Service Villages will be the focus for new development and facilities.

Provision will be made for the following:

- Small scale housing developments consistent with the indicative housing numbers set out in Policy 5 ...
- ...

Settlement Boundaries

There is a presumption in favour of sustainable development within the Settlement Boundaries which will be reviewed through the preparation of Development Plan Documents and/or Neighbourhood Plans ...

Rest of the Plan Area: Small villages, hamlets, scattered development and countryside

Development in the Rest of the Plan Area outside the settlements listed above is restricted to that which requires a countryside location or meets an essential local rural need or supports rural diversification in accordance with Policies 45-46.”

12. Chapter 7, “Housing and Neighbourhoods”, identifies the number of homes to be provided in the plan period (paragraph 7.10), and states that a “significant element” of that provision had already been identified (paragraph 7.11). It explains that of the remaining provision of 4,740 homes in the plan period, 3,250 are allocated at the “Strategic Development Locations”, 630 on “strategic sites to be identified at the settlement hubs of East Wittering/Bracklesham, Selsey and Southbourne” under Policies 20, 23 and 24, and 860 “to be brought forward on parish housing sites” under Policy 5 (paragraph 7.12). This approach to the provision of new housing is reflected in Policy 4. In Table 7.2, “Summary of Housing Locations and Sites Identified in the Local Plan to 2029”, the “approximate” number of homes indicated for “Southbourne village” as one of the “Strategic Allocations” under Policy 20 is 300; and the “approximate” number for “Parish housing sites” under Policy 5 is 860. On the “Parish Housing Sites”, paragraph 7.27 says that suitable sites and locations “will be identified meeting the criteria set in Policy 2 ...”. Policy 5 states that “[small] scale housing sites will be identified to address the specific needs of local communities in accordance with the indicative

parish housing numbers set out below”, and that “[suitable] sites will be identified in neighbourhood plans or in a Site Allocation DPD ...”. The “indicative” housing number for “Southbourne (excluding Southbourne village)”, excluding strategic housing allocations, is 50. Under the heading “Neighbourhood Planning”, paragraph 7.30 says:

“7.30 A Neighbourhood Development Plan and its policies will work alongside, and where appropriate replace, the policies in the Local Plan where they overlap. The policies will only apply to the specific area covered by that Neighbourhood Development Plan Existing Settlement Boundaries may be reviewed through Neighbourhood Development Plans. ...”.

13. In chapter 12, “The East-West Corridor”, in text headed “Southbourne Strategic Development”, paragraph 12.65 refers to the requirement of “around 300 homes over the Plan period ...”. It says that “Southbourne Parish Council is preparing a neighbourhood plan for the parish which will identify potential development site(s)”. Policy 20 reflects this. It says that “[land] at Southbourne will be allocated for development in the Southbourne Neighbourhood Plan including any amendments to the Settlement Boundary”; that the development to be planned for will include “300 homes”; and that development should be “planned as an extension(s) to Southbourne, that is well integrated with the village and provides good access to existing facilities”.
14. In chapter 19, “The Environment”, Policy 45 states, under the heading “Development in the Countryside”:

“Within the countryside, outside Settlement Boundaries, development will be granted where it requires a countryside location and meets the essential, small scale, and local need which cannot be met within or immediately adjacent to existing settlements.

Planning permission will be granted for sustainable development in the countryside where it can be demonstrated that all the following criteria have been met:

1. The proposal is well related to an existing farmstead or group of buildings, or located close to an established settlement;
 2. The proposal is complementary to and does not prejudice any viable agricultural operations on a farm and other existing viable uses; and
 3. Proposals requiring a countryside setting, for example agricultural buildings, ensure that their scale, siting, design and materials would have a minimal impact on the landscape and rural character of the area.
- ...”.

The neighbourhood plan

15. In section 2 of the neighbourhood plan, under the heading “Planning Policy Context”, paragraphs 2.40 to 2.45 refer to the housing policies in the local plan that were relevant to Southbourne.
16. Section 3, “Vision & Objectives”, describes the “vision for Southbourne in 2029” (paragraph 3.1) and the plan’s “key objectives” in achieving it (paragraph 3.2). One of those objectives is

“to avoid increasing traffic congestion at the Stein Road railway crossing in the plan period and to identify long term solutions” (paragraph 3.2.9).

17. In section 4, “Land Use Policies”, paragraph 4.1 says that the neighbourhood plan “contains a series of land use policies that focus on the settlements of Southbourne and Nutbourne, the successful delivery of which during the plan period of April 2014 to March 2029 will achieve the community’s vision for the parish”. Paragraph 4.2 states:

“4.2 It is not the purpose of the SPNP to contain all land use and development planning policy relating to the parish. The saved policies of the 1999 Chichester District Local Plan have now been replaced by the CLPKP which will be used by the local planning authority to consider and determine planning applications.”

18. Policy 1, “Development within the Settlement Boundaries”, states:

“The Neighbourhood Plan will support development proposals located inside the Settlement Boundaries of Southbourne/Prinsted, Nutbourne West and Hermitage/Lumley/Thornham, as shown on the Policies Map, provided they accord with other provisions of the Neighbourhood Plan and development plan.”

19. In the supporting text, paragraph 4.4 says that Policy 1 “encourages” future development to be in the specified “established settlements”. Paragraph 4.5 says the policy “proposes amendments to the Settlement Boundaries of Southbourne and Nutbourne villages to accommodate new development on the edge of the settlements but also seeks to protect the essential countryside character of the defined settlement gaps between Southbourne, Nutbourne and Hermitage/Lumley/Thornham villages ...”. Paragraph 4.6 explains that, “as there are no sites of sufficient size to accommodate new development within [the settlement boundaries established in the 1999 local plan], their alignment requires amendments in order to make provision for the site allocations in Policy 2”. Paragraph 4.7 lists the criteria used in reviewing the settlement boundaries, one of which is “c) Minimisation of local traffic congestion – only land south of the Stein Road railway level crossing ...”. Paragraph 4.8 says the policy accords with “the principles for reviewing the settlement boundary as proposed in Policy 2 of the CLPKP ...”. Paragraph 4.9 emphasizes that by concentrating development south of the level crossing “the spatial plan minimises the impact of development on a serious traffic congestion and severance issue that will not be resolved during the plan period”. Paragraph 4.10 adds that, “[by] directing growth through land allocations south of the level crossing and alongside the A259 ... , this policy makes sensible and reasonable provisions”. Paragraph 4.13 says that “[the] policy anticipates and responds to the new Local Plan policies 4, 5 and 20 in respect of Southbourne village being identified in the settlement hierarchy ... as being suitable for strategic development”, and that “[the] proposed amendments to the settlement boundaries will allow for a scale of housing growth and green infrastructure provision desired by these policies”.

20. Policy 2, “Housing Site Allocations”, allocates four sites for development in the plan period, for a total of 350 dwellings, three of them in Southbourne village, the fourth at Nutbourne West:

“The Neighbourhood Plan allocates the following sites for housing development of a mix of mainly 1, 2, 3 and 4 bedroom homes, as shown on the Policies Map, subject to the development principles outlined:

- I. 150 dwellings on land at Loveders Mobile Home Park, Main Road ...
- II. 125 dwellings on Land North of Alfrey Close ...
- III. 25 dwellings on land at Gosden Green ...
- IV. 50 dwellings on Land at Nutbourne West ...

...”.

21. Paragraph 4.15 says the three sites allocated in Southbourne village “are all located within the amended Settlement Boundaries defined in Policy 1 and together will deliver 300 new homes”, which “represents a significant increase – about 20% – in the size of the village and is well in excess of the rate of new housing delivery of the past few years”. Paragraph 4.17 says these three allocations “together will deliver a variety of new homes distributed evenly on both sides of the village and south of the railway crossing”.
22. In the submission draft of the neighbourhood plan Policy 1 had contained an additional sentence, which said that “[development] proposals outside the Settlement Boundary will be required to conform to development plan policy in respect of the control of development in the countryside”. Recommending the deletion of that sentence, the examiner said (in paragraph 5.9 of his report):

“5.9 To the extent that over the life of the Plan proposals might come forward for development outside the settlement boundaries, it would not be appropriate for the Plan to require such proposals to conform to development plan policy in the countryside. That responsibility should be for Chichester District Council to determine through its development plan policies. For this reason I have indicated that if this policy is to be retained, the final sentence of the draft policy should be removed In the explanatory text, the policy should therefore encourage, rather than direct development, within the established settlements within the parish.”

The inspector’s decision letter

23. In a passage of his decision letter headed “Development Plan Strategy” the inspector set out the relevant policies of the development plan (in paragraphs 6 to 8). He went on to say (in paragraphs 9 to 18):
 - “9. The appeal site comprises essentially undeveloped land which was formerly used as an orchard. It abuts the eastern edge of established residential development at Breach Avenue as well as Fraser Gardens and East Field Close. However, the site falls outside of the settlement boundary as defined in the NP and is not allocated for any form of development. Nor is it claimed that the appeal proposal would meet an essential, small scale and local need. It is common ground, therefore, that the proposal would be contrary to LP Policies 2 and 45.
 10. The Council considers that the proposal is also in conflict with LP Policy 5 and NP Policies 1 and 2 on the basis that the unplanned provision of 34 dwellings would be at variance with the development strategy for Southbourne which was properly considered through the LP and NP preparation processes.

11. The appellant contends that these policies are silent on the question of housing development outside of settlement boundaries and are, therefore, not relevant to the appeal proposal. The appellant points to the NP Examiner's Report which recommended the omission of wording from Policy 1 which would have required development outside of settlement boundaries to conform to development plan policy for the control of development in the countryside. Moreover, it is argued that the scale of development proposed would not be inconsistent with the overall size of Southbourne or the level of development anticipated there in the development plan strategy. The appellant draws support for its approach from an appeal decision at Newick.
12. I agree with the appellant that the policies in question do not directly presume against development outside of settlement boundaries. Furthermore, it was accepted by the Council that LP Policy 5 does not set a cap on the amount of housing which may be provided. That much is plain from the policy's use of the phrase 'indicative housing numbers.'
13. Nevertheless, nor is there anything in the NP policies which supports the proposal. Indeed, it is clear that the way in which the settlement boundary was amended under NP Policy 1, and the housing allocations located under Policy 2, was the result of an intention to avoid further development north of the railway line in order to minimise congestion at the Stein Road level crossing. I also heard from interested parties at the Inquiry, as well as others in written submissions, how important this consideration was to local people in the preparation of the NP. The appeal site is located to the north of the railway line. For this reason it was considered and rejected as a housing location during the NP preparation process. I consider below the effect of the proposal on congestion at the crossing. However, at this stage, it is pertinent to recognise that the proposal is at odds with the aims of the NP with regard to the location of new housing.
14. The NP examiner explains the reason for recommending the amendment to Policy 1 at paragraph 5.9 of his Report. He says that it would not be appropriate for the NP to require proposals outside of settlement boundaries to conform to development plan policy for the countryside; that responsibility should be for the District Council through its development plan policies. It seems to me therefore, that the Examiner was not offering support for development outside of settlement boundaries. Rather, he was merely seeking to ensure that the matter is dealt with at the appropriate level of plan making. That approach is consistent with the principle that proposals should be determined in accordance with the development plan when read as a whole, unless material considerations indicate otherwise.
15. I recognise that there are many parallels between the considerations in this appeal and those in the Newick case. In particular, the recognition that the policies of the Joint Core Strategy (JCS) and Newick Neighbourhood Plan did not place a cap on development in the settlement. Notwithstanding that the Newick Neighbourhood Plan was made before the full extent of housing allocations in the JCS had been established, it is also relevant that the scale of the proposal in that case was, relative to the size of the settlement, greater than in this case.

16. Moreover, it was accepted by the Council's planning witness that the housing numbers for Southbourne in the LP are not maximums. Furthermore, notwithstanding a suggestion to the contrary in the Council's closing submissions, its planning witness accepted that, had the 34 units been located within the settlement boundary, there would have been no objection on the basis of the scale of the proposal. There is no firm evidence to indicate that the proposed 34 units would be incompatible with the scale of Southbourne as a whole or that future occupiers would not be adequately served by reasonably accessible local services and facilities. Indeed the Council accepted that the site is sustainably located in that regard.
17. I recognise that the indicative figures in the LP represent a considered policy response to the scale of development to be accommodated in Southbourne. However, the proposal would represent an increase of less than 10% over the 350 dwellings earmarked for Southbourne as a whole. Since the site adjoins the established built up area and is fairly well linked to its facilities, I consider this to be a more useful comparison than the Council's reference to the 50 dwellings indicated in LP Policy 5. It also distinguishes the proposal from the Hambrook appeal cited by the Council. In that case 120 dwellings were proposed in a considerably smaller settlement where just 25 additional units were allocated in the Local Plan. Consequently, I consider that the scale of the proposal, as opposed to its location, would not be at odds with the broad development plan strategy for new housing as indicated in LP Policies 5 and 20.
18. The silence of NP Policies 1 and 2 on the question of development outside of settlement boundaries is not a positive point in favour of the appeal proposal. As such, it does not outweigh the proposal's conflict with LP Policies 2 and 45 and its lack of accord with the aim of the NP with regard to the location of new housing. Therefore, I find that the proposal would be contrary to the development plan strategy for the location of residential development when considered as a whole. ...
.”
24. On “Housing Land Supply” he found that the district council “cannot demonstrate a five year supply of deliverable housing land” (paragraph 32)
25. His conclusion on the likely effect of the proposed development on congestion at the Stein Road level crossing was that “the number of additional vehicle movements generated by the proposal would not materially increase the waiting times at the crossing” (paragraph 43).
26. Finally, on the “Planning Balance”, he concluded (in paragraphs 47 to 55):
 - “47. Section 38(6) of [the 2004 Act] requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise. I have found that the proposal conflicts with LP Policies 2 and 45 and does not accord with the aim of the NP with regard to the location of new housing.
 48. Nonetheless, I have concluded that the Council cannot demonstrate a five year supply of housing as required by the Framework. ...

49. Even taking the Council's figure for the number of housing units to be delivered over the next years ... , the ... land supply position would be marginal. However, I have found that substantially fewer units are likely to be delivered. The appellant also considers that the LP is out of date pending the adoption of the DPD. However, there is nothing to suggest that the settlement boundaries for Southbourne will be affected by the completion of that process. Therefore, whilst Policies 2 and 45 are relevant to the supply of housing, I consider that they should still carry moderate weight in the determination of this appeal. I have also found that the scale of the proposal would not be at odds with the level of residential development in Southbourne indicated in LP Policies 5 and 20. Furthermore Southbourne is identified in the LP as a Settlement Hub where strategic development is anticipated. Nor have I found that proposal would lead to other direct harms. Therefore, notwithstanding the conflict with the terms of LP Policies 2 and 45, in practice, the degree of harm to the development plan strategy would be limited.
50. Framework paragraphs 184 and 198 advise that neighbourhood planning provides a powerful tool for local people to ensure that they get the right type of development and that proposals which conflict with a made Neighbourhood Plan should not normally be granted. Paragraph ... 41-083-20170810 of the Planning Practice Guidance advises on the application of the Written Ministerial Statement on Neighbourhood Planning dated 12 December 2016 following [the judgment in *Hopkins Homes Ltd. v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865]. It advises that where, as in this case, the criteria in the Written Ministerial Statement apply, significant weight should still be given to the Neighbourhood Plan notwithstanding the fact that the local planning authority cannot demonstrate a five year supply of deliverable housing sites. I recognise that a great deal of time and effort was invested in the preparation of the NP and that local people responded positively to Government policies on neighbourhood planning. Allowing the appeal could seem to undermine confidence in the planning process. These matters form part of the social dimension of sustainability which, Framework paragraph 7 advises, includes supporting strong, vibrant communities.
51. However, I have found that the proposal would not conflict with the policies of the NP and would not materially exacerbate congestion at the railway crossing. As such, it would not cause harm in respect of the underlying reason why the NP seeks to restrict development north of the railway line. ...
- ...
55. Overall therefore, I find that the adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits of the proposal. As such, the proposal benefits from the presumption in favour of sustainable development set out in Framework paragraph 14 and LP Policy 1. This consideration is sufficient to overcome the conflict with LP Policies 2 and 45 and the aim of the NP with regard to the location of new housing.”

The judgment in the court below

27. The judge concluded that, in applying the policy in paragraph 198 of the NPPF, the inspector had found the proposal did not conflict with the neighbourhood plan but did with the local plan (paragraph 45 of the judgment). The proposal was “not explicitly contrary to either Policy 1 or [Policy] 2” of the neighbourhood plan, but those policies “offered no positive support for development outside the settlement boundary and specified areas”. The “amendment” to the neighbourhood plan recommended by the examiner had made it “plain that development outside the settlement boundary and specified areas is a matter for [the local plan]”. The “aim” was to keep development to the south of the Stein Road level crossing. But “such a limitation was not expressed in ... Policies 1 and 2 so that it can properly be said that any proposed development there (or anywhere outside the settlement boundary and specified areas) “conflicts” with [the neighbourhood plan]” (paragraph 62). This case differed from *Crane v Secretary of State for Communities and Local Development* [2015] EWHC 425 (Admin). The neighbourhood plan there was “comprehensive”. Here there was no equivalent to the policy for “windfall” development in that case, and the neighbourhood plan was “silent” on development outside the settlement boundary and the locations referred to in Policies 1 and 2 (paragraph 68). There the allocations were “explicitly the planned maximum provision of new housing”, but in this case neither the local plan nor the neighbourhood plan capped the amount of housing to be provided (paragraph 69).

Did the inspector misconstrue, misapply or fail to apply the paragraph 198 policy?

28. The essential argument for the district council, persuasively presented by Mr Gwion Lewis, was that Beechcroft’s proposal was plainly in conflict with both the aims and the policies of neighbourhood plan, and the inspector should have seen that. It was contrary to the objectives and vision of the plan. When the plan was being prepared the site had been rejected as a suitable location for housing development. The proposed development was in conflict with Policy 1 because it was outside the settlement boundary established for Southbourne, and with Policy 2 because it was not on one of the allocated sites and was thus contrary to the parish council’s judgment on the suitable locations for new housing. To distinguish as the inspector did between the aims of the neighbourhood plan and its policies, and to conclude that the proposal was at odds with the former but not in conflict with the latter, was, Mr Lewis submitted, irrational and inconsistent with the policy in paragraph 198 of the NPPF. The approach adopted by the inspector and endorsed by the judge was irreconcilable with this court’s recent decision in *Gladman Developments Ltd. v Canterbury City Council* [2019] EWCA Civ 669 and the first instance decision in *Crane* – in both of which the circumstances were analogous to this case. Mr Lewis’s alternative argument was that if, on a true reading of the decision letter, the inspector reached no clear conclusion on the question of conflict with the neighbourhood plan, he erred in failing to do so. The policy in paragraph 198 of the NPPF required him to do it.

29. Those submissions were countered by Mr Guy Williams for the Secretary of State and Mr Killian Garvey for Beechcroft, both of whom argued that the inspector’s approach was impeccable and the judge’s analysis correct. The inspector did not misconstrue or misapply, or fail to apply, the policy in paragraph 198 of the NPPF. He found the proposal to be not in accordance with the development plan, and in conflict with it, because it was contrary to the policies of the local plan for proposals on unallocated sites outside settlement boundaries. But he also took into account the fact that it did not accord with the aims of the neighbourhood

plan for the location of new housing. The circumstances in this case can readily be distinguished from both *Crane* and *Gladman v Canterbury City Council*. The conflict with the development plan here was a conflict with policies that were explicitly against the proposed development. There was no need for any “negative inference” to that effect. Those policies were not in the neighbourhood plan but in the local plan – Policies 2 and 45, which govern decision-making for proposed housing development on an unallocated site outside a settlement boundary.

30. I cannot accept Mr Lewis’s argument. In my view the inspector’s understanding of the relevant policies of the development plan was correct. Nor did he misinterpret or misapply, or overlook the policy in paragraph 198 of the NPPF.
31. The relevant legal principles are well known (see my judgment in *Gladman v Canterbury City Council*, at paragraphs 20 to 22, citing previous authority in this court and above). The decision-maker’s duty under section 38(6) of the 2004 Act creates a statutory presumption in favour of the development plan (see the speech of Lord Clyde in *City of Edinburgh Council v Secretary of State for Scotland* [1997] 1 W.L.R. 1447 at, pp.1449, 1450 and 1458 to 1460, and my judgment in *Secretary of State for Communities and Local Government v BDW Trading Ltd. (T/A David Wilson Homes (Central, Mercia and West Midlands))* [2016] EWCA Civ 493, at paragraphs 18 to 23). The presumption applies to the statutorily adopted plan as a whole (see the judgment of Lord Reed in *Tesco Stores Ltd. v Dundee City Council* [2012] P.T.S.R. 983, at paragraphs 18 and 21 to 23). To apply the statutory presumption, the decision-maker must interpret the relevant provisions of the plan accurately (see the speech of Lord Clyde in *City of Edinburgh*, at pp.1450 and 1458 to 1460), with a focus on its policies for the development and use of land in the local planning authority’s area (see the judgment of Richards L.J. in *R. (on the application of Cherkley Campaign Ltd.) v Mole Valley District Council* [2014] EWCA Civ 567, at paragraph 16). The interpretation of planning policy is ultimately a task for the court, reading the policy sensibly and in its full context (see the judgment of Lord Reed in *Tesco Stores Ltd.*, at paragraphs 18 and 19). Where the real complaint is that a particular policy has simply been misapplied, the court will only intervene where the decision-maker has fallen into “Wednesbury” error (see the judgment of Lord Carnwath in *Hopkins Homes Ltd. v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, at paragraph 26, and my judgment in *Barwood Strategic Land II LLP v East Staffordshire Borough Council* [2017] EWCA Civ 893, at paragraph 50).
32. As the authorities show, the circumstances in which those basic principles are applied will vary widely. Reading the analysis in one case across into another can be mistaken. No two plans are the same. The policies of each are unique, crafted for the area or neighbourhood to which they relate, not to fit some wider pattern or prescription. Often there will be more than a single component of the development plan relevant to the proposal. In many cases – and this is one – there will be both an adopted local plan and a “made” neighbourhood plan. In such cases the court must keep in mind that the “development plan” to which section 38(6) applies is the statutory plan in its totality, its constituent parts taken together. Relevant policies may be found both in a local plan and in a neighbourhood plan. But the statutory presumption applies to the entire plan – the local plan and the neighbourhood plan together.
33. The dispute in this case, however, is not about the statutory presumption in favour of the development plan, or about the correct interpretation or lawful application of development plan policy. It is about the meaning of government policy in paragraph 198 of the NPPF and its application by the inspector in making his decision on Beechcroft’s appeal.

34. The policy is not difficult to understand. It is simply stated, and clear. The concept that when an application “conflicts with a neighbourhood plan” planning permission “should not normally be granted” is straightforward. It carries a policy presumption consistent both with the statutory presumption in favour of the development plan as a whole in section 38(6) of the 2004 Act, which includes a neighbourhood plan, and with the broader theme of the plan-led approach to development control recurrent throughout the NPPF. It does not modify the presumption in section 38(6); it reflects that presumption. And it does not elevate the status of a neighbourhood plan within the development plan as a whole (see the judgment of Holgate J. in *Woodcock Holdings Ltd. v Secretary of State for Communities and Local Government* [2015] EWHC 1173 (Admin), at paragraph 24; and, in this court, *R. (on the application of DLA Delivery Ltd. v Lewes District Council* [2017] EWCA Civ 58, at paragraph 11). None of this is controversial here.
35. It is not suggested that the inspector failed to see which policies of the development plan were relevant to Beechcroft’s proposal, or that he misunderstood any of them. As he recognized, six policies of the plan were of particular relevance: four in the local plan, two in the neighbourhood plan. The four local plan policies were Policies 2, 5, 20 and 45; the two policies of the neighbourhood plan were Policies 1 and 2. Of these six policies, those bearing directly on the inspector’s decision were Policies 2 and 45 of the local plan. These were the policies specifically relevant to development on unallocated sites in the “countryside” outside settlement boundaries, and so to the proposed development of housing on the appeal site, which was outside the settlement boundary for the settlement of Southbourne.
36. Policy 2 of the local plan is a broad strategic policy. It is not confined to housing development, but embraces development of all types. It sets out the “Development Strategy” and the “Settlement Hierarchy” for the whole district. It states a “presumption in favour of sustainable development” within the settlement boundaries, which were to be reviewed in “Development Plan Documents and Neighbourhood Plans”. It devolves to those other plans the task of establishing revised settlement boundaries, within which that “presumption in favour of sustainable development” would apply. At the same time, however, it reserves to the local plan itself the task of setting in place the district-wide policy for development in the “Rest of the Plan Area” – outside settlement boundaries. It lays the strategic foundation for Policies 45 and 46, by stating the principle that “[development] in the Rest of the Plan Area outside the settlements ... is restricted to that which requires a countryside location or meets an essential local rural need or supports rural diversification in accordance with Policies 45-46”.
37. Policy 5 provides for “[small] scale housing sites” to meet the specific needs of local communities to be identified either in neighbourhood plans or in a Site Allocation DPD, and specifies for the parish of Southbourne, excluding the village of Southbourne, an “indicative” number of 50 dwellings. This is not stated to be a maximum requirement. Policy 20 provides for strategic development in Southbourne, to be allocated in the neighbourhood plan, which was to include “300 homes”. Again, the figure is not said to be a maximum.
38. Policy 45 is the development control policy for “Development in the Countryside”. It gives effect to the strategic principle of restricting development in the “countryside”, stated in Policy 2. It guides decision-making on proposals – such as Beechcroft’s – for the development of housing on unallocated sites outside the settlement boundaries, once those boundaries have been set in development plan documents and neighbourhood plans. It does not entirely preclude development outside settlement boundaries. It is, however, strongly restrictive. It

limits acceptable proposals to development that “requires a countryside location and meets the essential, small scale, and local need which cannot be met within or immediately adjacent to existing settlements”. And it states three criteria, all of which must be met if planning permission for “sustainable development in the countryside” is to be granted. If those three criteria are met, the proposal would be justified under the policy, and would accord with it. But proposals for larger-scale development, or for smaller-scale development that might have been acceptable but for a failure to comply with the criteria in the policy, are not in accordance with the policy.

39. The purpose of the “land use policies” in the neighbourhood plan is explained in the text of the plan itself, in particular paragraph 4.2, which makes it quite clear that “[it] is not the purpose of [the neighbourhood plan] to contain all land use and development planning policy relating to the parish”, and that “the [local plan] will be used by [the district council as] local planning authority to consider and determine planning applications”. This emphasizes the limited scope for the policies of the neighbourhood plan in the business of development control – the making of decisions on planning applications and appeals.
40. Policy 1 of the neighbourhood plan supports proposals for development within the settlement boundaries, “provided they accord with other provisions of the Neighbourhood Plan and development plan”. It responds to the role envisaged for neighbourhood plans by Policy 2 of the local plan: to fix settlement boundaries, within which “a presumption in favour of sustainable development” will apply. But it says nothing about development outside the settlement boundaries. It does not cut across the operation of Policies 2 and 45 of the local plan, which are the development plan policies specifically relevant to the determination of such proposals. Policy 2 of the neighbourhood plan is a policy of allocation. It carries forward, in the parish of Southbourne, the strategic imperative for the allocation of sites for housing development under Policies 2, 5 and 20 of the local plan. It is the parish council’s response to that requirement. Like Policy 1 of the neighbourhood plan, however, it does not affect the operation of Policies 2 and 45 of the local plan.
41. There is no other policy of the neighbourhood plan governing the suitable amount and location of housing development in the parish of Southbourne; none for unallocated or “windfall” sites; and none to refine the criteria-based approach to development outside settlement boundaries in Policy 45 of the local plan. No policy in the neighbourhood plan replicates Policy 45 or provides any different approach to proposals for development outside settlement boundaries. There was no need to include such a policy in the neighbourhood plan, and it would have been inappropriate to do so. As Mr Garvey submitted, if a stricter – or more liberal – policy for development outside settlement boundaries had been inserted in that plan, it would have upset the carefully formulated policies for such proposals already in place in the recently adopted local plan. It would have clashed with local plan Policies 2 and 45.
42. This, therefore, is not one of those cases in which a complete set of development plan policies for housing development is to be found in a single document. The strategy for housing development in Southbourne is undoubtedly complete. It does not lack any necessary policy. It contains a suite of policies covering the full range of locations where housing development might be allocated or proposed. But it is not all in one document. It is deliberately split between two. It spans the local plan and the neighbourhood plan, which went through their statutory processes at the same time, and relate to the same plan period. Neither plan on its own constitutes the entire development plan strategy for housing development in Southbourne. Together, however, as two elements, they compose the full strategy. They are mutually

dependent parts of a single, comprehensive whole, complementing each other. The positive part of the strategy, which sets the plan's approach to the allocation of sites for housing development, includes Policies 5 and 20 of the local plan, which are translated to the neighbourhood level in Policies 1 and 2 of the neighbourhood plan. The restrictive part is in Policies 2 and 45 of the local plan, limiting development in the "countryside" outside settlement boundaries – which have no counterpart in the neighbourhood plan. As the examiner discerned in the neighbourhood plan process, the local plan conferred on the neighbourhood plan the opportunity to make allocations and to revise the settlement boundary, while the neighbourhood plan left squarely with the local plan the task of framing a development control policy for unallocated sites outside the settlement boundaries – which is what it did in Policies 2 and 45.

43. In both *Crane* and *Gladman v Canterbury City Council* the circumstances were different. In *Crane* the proposal was for a development of 111 dwellings on an unallocated site in the village of Broughton Astley. In the Broughton Astley Neighbourhood Plan there were three policies for housing development – policies H1, H2 and H3. Policy H1 made two specific allocations of land and identified a reserve site for a total of 528 dwellings, which was well in excess of the core strategy requirement of "at least 400 ...". Other provisions explained the approach to securing infrastructure and facilities for development on the allocated sites. Policy H2 concerned the provision of affordable housing – requiring at least 30% in all new housing developments. Policy H3 provided for "windfall" development – stating that "[in] principle development will be supported on sites of less than 5 dwellings on previously developed land". The Secretary of State concluded that the proposal was in conflict with the neighbourhood plan, and in view of the policies in paragraphs 185 and 198 of the NPPF he gave "very substantial negative weight" to that conflict. The applicant argued that his conclusion was bad in law. The neighbourhood plan did not define a "settlement boundary" for Broughton Astley – as policy CS2 of the core strategy had envisaged. Nor did it contain any specific policy restricting the development of the site. Policy H1 simply allocated sites for new housing development, but did not preclude development in other locations. Policy H3 did not prevent development on larger sites than those to which it referred. No other policy of the neighbourhood plan was explicitly hostile to the proposal.
44. The court did not accept those submissions. It held that the neighbourhood plan displayed a "comprehensive approach to planning at the neighbourhood level ..." (paragraph 41 of my judgment); that, in the light of the relevant provisions of the neighbourhood plan taken as a whole, "the allocations in policy H1 [represented] both the acceptable location and the acceptable level of new housing development in Broughton Astley in the plan period, albeit with the latitude for approving "windfall" development in policy H3"; that they were "explicitly the planned "maximum" provision of new housing, as one sees in the subsequent policies setting out the requirements for each of them"; that the parish council had "achieved this without needing to define a settlement boundary, or "Limits to Development" of the kind contemplated by Policy CS2 of the core strategy" (paragraph 42); that "[apart] from "windfall" proposals coming forward under [policy H3], the [neighbourhood] plan does not provide for, or envisage, any housing development in excess of the 528 dwellings on the sites allocated under policy H1" (paragraph 43); and that "[larger] proposals for housing on unallocated sites ... will therefore be in conflict both with the neighbourhood plan itself and with the development plan as a whole" (paragraph 46).
45. In *Gladman v Canterbury City Council* the settlement in question – the village of Blean – had no "defined boundary", but it was not in dispute that the proposed development was outside

the “existing built up area”. The development plan comprised the saved policies of the adopted local plan. These included Policy H1 – for residential development on allocated sites, and, in specified circumstances, on “other non-identified sites, on previously developed land within urban areas”. Policy H2 dealt with a reserve allocation of land on a particular site. Policy H3, for proposals for the development of unidentified “large sites” – sites for five or more dwellings – had not been saved. In a section of the plan headed “HOUSING OUTSIDE URBAN AREAS”, Policy H9 stated that “[planning] permission for new residential development, in excess of minor development, on previously developed sites within villages, will only be granted where” four criteria were met. Under the heading “Housing for Local Needs in the Countryside”, paragraph 2.58 said that the city council “recognises that in certain circumstances housing should be provided in the countryside to meet an identified housing need”, and that “[this] need should be based on an up-to-date housing needs survey carried out in conjunction with the Parish Council ...”. Policies EN1 and EN3 were for the protection of the countryside, and of the landscape and wildlife habitats. It was argued by the applicant in that case that the saved policies were in permissive terms, not restrictive, and did not preclude housing development in other locations outside existing urban areas.

46. That argument was rejected at first instance and on appeal. This court held that the strategy contained in the saved policies established “a clear and complete hierarchy of locations in which proposals for new housing would or might be acceptable ...” (paragraph 31 of my judgment); that “the natural and necessary inference ... was that housing development of a kind or in a location other than those explicitly supported under the saved policies, including Policy H1 and Policy H9, could not be regarded as being in accordance with the development plan”, but “would be in conflict with the plan, because it would be contrary to the comprehensive strategy for housing development embodied in the surviving policies” (paragraph 34); that “this necessary inference [was] only reinforced by the policy objectives and the supporting text, which emphasized the city council’s intention to steer housing development to the existing urban areas and previously developed land and away from undeveloped sites in the countryside”, and the “inference, therefore, [was] not neutral or positive towards development without specific support in the policies, but negative” (paragraph 35); and that in this respect, the case “bears some similarity to *Crane* ...” (paragraph 36).
47. What those two cases show is that there will sometimes be circumstances in which a proposal for housing development, though it neither complies with nor offends the terms of any particular policy of the development plan, is nevertheless in conflict with the plan because it is manifestly incompatible with the relevant strategy in it. This may be a matter of “natural and necessary inference” from the relevant policies of the plan, read sensibly and as a whole. The effect of those policies may be – I stress “may be” – that a proposal they do not explicitly support is also, inevitably, contrary to them. Whether this is so will always depend on the particular context, and, critically, the wording of the relevant policies, their objectives, and their supporting text.
48. In this case, however, as Mr Williams and Mr Garvey submitted, the structure and content of the relevant policies of the development plan are not as they were in either *Crane* or *Gladman v Canterbury City Council*. In common with both of those cases, the relevant provisions of the development plan form a comprehensive strategy. Here however, unlike *Crane*, the relevant strategy is purposely split between the local plan and the neighbourhood plan. It embraces policies in both plans, which went through their statutory processes at the same time, and whose policies complement, and are consistent with, each other. The housing provision for

which the district council has planned is not expressed as a maximum level of provision. The neighbourhood plan does not have a policy for development on unallocated sites akin to the policy for “windfall” housing development in the Broughton Astley Neighbourhood Plan – Policy H3. A settlement boundary has been established in the neighbourhood plan. The approach to decision-making on development outside that settlement boundary is not merely implicit. It is set by express policies of the development plan. However, those policies are not in the neighbourhood plan, but in the local plan – Policies 2 and 45.

49. Unlike *Gladman v Canterbury City Council*, the policies of the local plan do not require any “natural and necessary inference” to be drawn in deciding whether a proposal such as Beechcroft’s is in accordance with the development plan. It is not necessary to deduce a conflict with the development plan from the absence of support in a specific policy. The policies of central relevance to the proposal are clear-cut, and the proposal was plainly contrary to them. The conflict with Policies 2 and 45 of the local plan was not merely a matter of inference. And it was distinct.
50. In my view therefore the judge’s analysis was sound. None of the inspector’s conclusions betrays any misinterpretation or misapplication of the development plan policies in play. There is nothing unlawful, or indeed surprising, about them. They represent a series of reasonable planning judgments in the application of the relevant policies, with which the court will not interfere. And the assessment of the proposal on its planning merits is not flawed by any legal error in understanding or applying the policy in paragraph 198 of the NPPF. To describe any of the inspector’s conclusions as “irrational” is, in my view, impossible.
51. The inspector acknowledged and consciously performed his duty as decision-maker under section 38(6) of the 2004 Act (paragraphs 14, 47 to 55 of the decision letter), and he did so lawfully. He took the development plan “as a whole” (paragraphs 14 and 18). He reached the clear conclusion, as the parties themselves had agreed, that Beechcroft’s proposal was not in accordance with the development plan because it was in conflict with Policies 2 and 45 of the local plan (paragraphs 9, 18, 47 and 55): a conclusion that was not only unexceptionable but inevitable. He carefully considered but rejected the district council’s contention that there was also conflict with Policy 5 of the local plan and Policies 1 and 2 of the neighbourhood plan (paragraphs 10, 11, 12 and 51). He did so because the neighbourhood plan policies “do not directly presume against” development outside settlement boundaries – which is true; and because the housing numbers in Policy 5 of the local plan are only “indicative” and “not maximums” – which is also true and was acknowledged by the district council at the inquiry (paragraphs 12, 16 and 17). But he did give weight, against the proposal, to the fact that it was “at odds with”, and “does not accord with”, the “aims” of the neighbourhood plan for the location of new housing – which again is true (paragraph 13, 18, 47 and 55). He also found, however, that the appeal site was “sustainably located” – which the district council had accepted; and that the “scale” of the proposed development was unobjectionable and “not ... at odds with” the development plan strategy for new housing indicated in Policies 5 and 20 of the local plan, which was a conclusion open to him as a matter of planning judgment (paragraphs 16, 17 and 49).
52. When he conducted his overall balancing exercise in the course of performing the section 38(6) duty, he accurately identified the proposal’s conflict with the development plan as being its conflict with Policies 2 and 45 of the local plan (paragraph 47). As he was entitled to do, he reduced the weight he gave to those two policies, as policies “relevant to the supply of housing” because of the district council’s inability to demonstrate a five-year supply of

housing land, but reasonably tempered that conclusion because the “scale” of the proposal was “not ... at odds with” the level of housing indicated in Policies 5 and 20 of the local plan, because of Southbourne’s status as a “Settlement Hub” where “strategic development” was envisaged, and because there was no other planning harm – all of which enabled him to conclude, in the exercise of his planning judgment, that the degree of harm to the “development plan strategy” would be “limited” (paragraph 49). His assessment ended with the conclusion, in the light of the policy in paragraph 14 of the NPPF, that the proposal’s failure to comply with Policies 2 and 45 of the local plan and with the aim of the neighbourhood plan for the location of new housing had been overcome (paragraph 55).

53. In his path to that conclusion the inspector did not overlook the policy in paragraph 198 of the NPPF, nor misconstrue or misapply it. That he had the policy in mind is undeniable; he not only referred to it but recited it (in paragraph 50). He also mentioned the general policy for neighbourhood plans in paragraph 184 of the NPPF and the relevant advice in the Planning Practice Guidance (paragraph 50). As is clear from his conspicuously precise conclusions in applying the relevant local plan policies and those of the neighbourhood plan (paragraphs 9 to 18 and 47 to 55), he grasped the fact that the relevant strategy of the development plan was divided between the two documents, and, crucially, that the conflict of Beechcroft’s proposal with the plan was not a conflict with the neighbourhood plan, which had nothing to say about development on unallocated sites beyond the settlement boundary, but a conflict with the policies of the local plan of direct relevance to such proposals – Policies 2 and 45. Thus, as he rightly said, “the proposal would not conflict with the policies of [the neighbourhood plan]” (paragraph 51). He added that the development would not harm the “underlying reason” for the neighbourhood plan’s restriction on development to the north of the railway line – because it would not worsen congestion at the level crossing (*ibid.*). But he did not discount the fact that the proposal found no support in the neighbourhood plan and was not in accord with its aim for the location of new housing (paragraphs 13, 18, 47 and 55). His conclusions on this point are, in my opinion, legally impeccable. He realized that the actual conflict with the development plan in this case was with the local plan, not with the neighbourhood plan, and – as Mr Garvey submitted – he did not make the mistake of counting that conflict twice, as if it were a conflict with both plans.
54. Lastly, even if this analysis is wrong and the inspector was at fault in failing to find, under the policy in paragraph 198 of the NPPF, that Beechcroft’s proposal was in conflict with the neighbourhood plan, I think the court’s discretion would have been properly exercised in withholding relief (see the decisions of this court in *Simplex GE (Holdings) Ltd. v Secretary of State for the Environment* [2017] P.T.S.R. 1041 and *Smech Properties Ltd. v Runnymede Borough Council* [2016] EWCA Civ 42). In my view the inspector’s decision would in those circumstances inevitably have been the same, for three reasons: first, because it seems to me that the policy presumption in paragraph 198 does not have the effect of enlarging the statutory presumption in favour of the development plan in section 38(6) of the 2004 Act (see paragraph 33 above); secondly, because the inspector applied the statutory presumption against Beechcroft’s proposal; and thirdly, because he recognized that the proposal did not comply with the aims of the neighbourhood plan for the location of new housing, and plainly gave this consideration as much weight as he thought it could reasonably have – and there is no reason to think he would have given it any greater weight if he had accepted, as Mr Lewis submitted, that the proposal was in conflict both with those aims of the plan and with its policies (see paragraph 28 above).

Conclusion

55. For the reasons I have given, I would dismiss the appeal.

Lord Justice Baker

56. I agree.

Sir Bernard Rix

57. I also agree.

APPENDIX 18:

06/2023/0030 – Planning Committee Report

Reporting to Planning Committee Meeting to be held on: 30th March 2023	Electoral Ward Affected Preston Rural East
Report submitted by: Director of Development and Housing	
Application Number: 06/2023/0030	

1 Summary

1.1 Land west of Garstang Road, Broughton, Preston, PR3 5JA

Outline planning application seeking approval for access only for residential development for up to 51no. dwellings with associated works (all other matters reserved)

Applicant Hollins Strategic Land LLP

Agent NJL Consulting

Case Officer Laura Holden

2 Decision recommended.

Refusal for the reason set out in paragraph 2.1

2.1 Reason for Refusal

1. The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield and allocated sites, within key service centres and other defined places. It fails to accord with the management of growth and investment set out in Policy 1 of the Central Lancashire Core Strategy. Furthermore, the proposed development is not the type of development deemed permissible in the open countryside under Policy RES1 of the Broughton Neighbourhood Development Plan or Policy EN1 of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies), hence the loss of open countryside for the development proposed is contrary to that policy. The proposed development is contrary to the spatial strategy set out in Policy 1 of the Central Lancashire Core Strategy, Policy EN1 of the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies) and Policy RES1 of the Broughton Neighbourhood Development Plan.

3 Information

3.1 Location

The application site is located to the west of Garstang Road, north of Bank Hall Farm and south of Broughton High School playing fields. The Guild Wheel cycle route passes along the northern boundary of the site, set between the application site and the school playing fields. To the west, the site is bound by Bank Hall Barn, open fields and a site with planning permission for 97 dwellings (06/2016/0736, known as Sandy Gate Lane in section 3.3 relevant history). The application site extends to approximately 2.57 hectares and is located within the open countryside and Area of Separation, as defined by the Policies Map contained within the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies). The site also falls within the Broughton Neighbourhood Development Plan area.

3.2 Proposal

The application seeks outline planning permission for up to 51no. dwellings, and associated works. Vehicular and pedestrian access would be taken from Garstang Road.

The parameters plan sets out the area of site which would be developed with residential development covering 2.69 hectares to the north of the site with areas of public open space and landscaping covering 1.62 hectares to the east, south and southwest, providing a buffer between the site and the nearby heritage assets.

The application proposes 20no affordable dwellings (40% of 51no. dwellings) and 5no. dwellings for the over 55s. The Planning Statement also indicates a commitment to providing larger homes for Black, Asian and Minority Ethnic (BAME) households, self-build plots and accessible and adaptable dwellings.

3.3 Relevant planning history

06/2021/1104 – Outline planning application seeking approval for access only for residential development for up to 51no. dwellings with associated works (all other matters reserved) – Refused January 2022.

Other relevant planning history within the vicinity of the site is as follows:

Land off Sandy Gate Lane

06/2016/0736 – Outline planning application for up to 97no. dwellings (access applied for only) – Refused May 2017. Allowed on appeal April 2018.

Land previously known as Key Fold Farm, Garstang Road

06/2017/0097 – Outline application for residential development for up to 130 houses with access considered – Refused June 2017. Allowed on Appeal April 2018.

3.4 Planning Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The Development plan comprises:

Central Lancashire Core Strategy

- Policy 1 – Locating Growth
- Policy 3 – Travel
- Policy 4 – Housing Delivery
- Policy 5 – Housing Density
- Policy 6 – Housing Quality
- Policy 7 – Affordable and Special Needs Housing
- Policy 14 – Education
- Policy 16 – Heritage Assets
- Policy 17 – Design of New Buildings
- Policy 18 – Green Infrastructure
- Policy 19 – Areas of Separation and Major Open Space
- Policy 21 – Landscape Character Areas
- Policy 22 – Biodiversity and Geodiversity
- Policy 26 – Crime and Community Safety
- Policy 27 – Sustainable Resources and New Developments
- Policy 29 – Water Management
- Policy 30 – Air Quality
- Policy 31 – Agricultural Land

Preston Local Plan 2012-26 (Site Allocations and Development Management Policies)

- Policy ST1 – Parking Standards
- Policy ST2 – General Transport Considerations
- Policy EN1 – Development in the Open Countryside
- Policy EN2 – Protection and Enhancement of Green Infrastructure
- Policy EN4 – Areas of Separation
- Policy EN7 – Land Quality
- Policy EN8 – Development and Heritage Assets
- Policy EN9 – Design of New Development
- Policy EN10 – Biodiversity and Nature Conservation
- Policy EN11 – Species Protection
- Policy HS3 – Green Infrastructure in New Housing Developments

Broughton Neighbourhood Development Plan

- Policy NE2 – Visual Impact of New Development
- Policy RES1 – Broughton Village – Housing Development Sites as an extension to the defined settlement boundary.
- Policy RES2 – Broughton Village Housing Mix
- Policy NE3 – Drainage
- Policy CF1 – Guild Wheel, Public Footpaths and Bridleways

Other Material Considerations:

Central Lancashire Supplementary Planning Documents (SPD)

- Design Guide
- Affordable Housing

Employment Skills
Open Space and Playing Pitch Strategy

National Planning Policy Guidance

National Planning Policy Framework (The Framework)
National Planning Practice Guidance (NPPG)
National Planning Policy for Waste
National Design Guide

Other Documents

The Conservation of Habitats and Species Regulations 2017
The Wildlife and Countryside Act 1981 (as amended)
Community Infrastructure Levy (CIL) Regulations 2010 (as amended)

3.5 Consultation responses

County Highways – No objection subject to conditions requiring the submission of a scheme for the new site access/junction, the new estate road/access shall be constructed in accordance with the LCC's Specification for Construction of Estate Roads, submission of details relating to the arrangements of the management and maintenance of the proposed streets, provision of the approved car parking areas, submission of the condition of the highway, provision of wheel cleaning facilities, provision of electric vehicle charging points and cycle parking.

County Education – A financial contribution towards 19 primary school places and 8 secondary school places is required.

Lead Local Flood Authority – No objection subject to conditions requiring the development to be carried out in accordance with the submitted Flood Risk Assessment, Surface Water Sustainable Drainage Strategy and Sustainable Drainage Pro-forma, and the submission of: the final Surface Water Sustainable Drainage Strategy; a Construction Surface Water Management Plan; a Sustainable Drainage System Operation and Maintenance Manual; and a Verification Report of the constructed sustainable drainage system.

Parks and Streetscene (Landscape) – No objections subject to a condition requiring the submission of a hard and soft landscaping scheme.

Parks and Streetscene (Trees) – No response received.

Environmental Health – No objection subject to conditions requiring the submission of a Phase 2 Geo-Environmental Site Investigation and Construction Environmental Management Plan, and a requirement that all dwellings are provided with an electric vehicle charging point prior to first occupation.

Waste Management – Comments received relating to the location of bin collection points on any subsequent reserved matters application for layout.

Friends of the Guild Wheel: Object as the proposed access crosses the Guild Wheel cycle path.

Greater Manchester Ecology Unit: No objection subject to conditions requiring the submission of tree protection measures, details of any external lighting, no vegetation clearance during bird nesting season, the development to be carried out in accordance with Amphibian Reasonable Avoidance Measures and the submission of biodiversity enhancement measures.

United Utilities – The site overlies the sandstone rock in Groundwater Source Protection Zone 2 & 3; an aquifer, abstracted at depth for public drinking water supply at nearby Broughton boreholes, northwest and southwest of the development. The applicant should follow best practice on their use and storage of fuels, oils and chemicals, to remove the risk of causing pollution during construction. The site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way. Conditions securing the final foul and surface water drainage scheme and foundation construction/design are recommended.

National Highways – No objection subject to a condition requiring the submission of Travel Plan.

Council for Protection of Rural England – No response received.

Natural England – No response received.

Broughton Parish Council – Object to the proposal, details of which can be summarised as follows:

- There has been no community involvement or discussion;
- The site is not designated within the Broughton Neighbourhood Plan or Core Strategy;
- Impact on the Area of Separation;
- Impact on nearby listed buildings, namely Bank Hall and the War Memorial;
- Impact on highway safety – in particular users of the Guild Wheel; and
- The site is open countryside.

Ben Wallace MP – Objects to the proposal, details of which can be summarised as follows:

- The proposal is contrary to the Preston Local Plan and Broughton Neighbourhood Plan;
- The proposal would impact on the Area of Separation; and
- The number of properties proposed would have a meaningful and detrimental impact on the local highway network.

Publicity – Six letters of objection from five addresses have been received, details of which can be summarised as follows:

- The development would cause harm to the setting of the listed buildings.
- The proposal is not in keeping with the character of the area and existing buildings.

- Other applications have been refused on this site and there is no change in circumstances.
- The proposal would conflict with the character of the area of Bank Hall hamlet.
- The proposed housing mix is not sufficient to outweigh the conflict with the Local Plan.
- The site is not allocated for housing in the emerging Central Lancashire Local Plan.
- The site should be retained within the area of separation between Broughton and Preston.
- The proposal does not comply with the development plan.
- The development would have an impact on existing drainage issues and could cause flooding.
- Vehicle access to the site will cross the Guild Wheel cycle path which causes safety concerns.
- The Council can demonstrate a 5-year housing land supply and therefore, this application is different to the other applications approved to the west and east of the application site.
- The proposal would lead to an increase in vehicle traffic creating congestion and highway safety concerns.
- The proposal goes against the Broughton Neighbourhood Development Plan as it does not preserve the village setting of Broughton.
- The proposal would impact the privacy of the adjacent neighbouring property, Bank Hall.
- The development would have an adverse impact on ecology, habitats and protected species.
- 51 houses would be squashed on to the site.
- More houses would have an impact on local amenities and school plans.

The following objections received are not material planning considerations and therefore will not be considered further:

- The site is Green Belt and should not be developed. The site is not designated as Green Belt and therefore, this would not be a material planning consideration in the assessment of this application.
- The site is within a Conservation Area. The site does not lie within a Conservation Area and therefore, this would not be a material planning consideration in the assessment of this application.
- The application should not be looked at as it offers no design or details at all. The proposal is an outline application and details of appearance, layout and scale will be assessed at the reserved matters stage.

3.6 **Analysis**

Principle of Proposal

Core Strategy Policy 1

Core Strategy Policy 1 seeks to concentrate growth and investment on well-located brownfield sites in Preston and adjacent to the Key Service Centres. The policy further states that in other places, including smaller villages and substantially built-up frontages, development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet a local need.

The application proposes up to 51no. dwellings on a greenfield site outside of the village boundary of Broughton. The application site is not a well-located brownfield site, an identified strategic location, within a Key Service Centre or main urban area. Other places, being open countryside locations, such as the application site, are at the bottom of the hierarchy, where Policy 1(f) directs development to be typically small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional needs for a larger scale redevelopment scheme.

The Planning Statement states that the application proposes to meet a local need in Preston by providing:

- Housing for over 55's;
- An increased provision of affordable housing over the policy requirement;
- Accessible and adaptable M4(2) and Wheelchair M4(3) dwellings;
- Larger homes for BAME households;
- Self-build plots.

Housing for over 55s

The proposal commits to a 10% provision of houses for over 55s which equates to 5 dwellings. The applicant's Planning Statement refers to the latest evidence in the City of Preston Housing Need and Demand Assessment 2022 (Arc4 HNDA 2022), which suggests there is a need of older person accommodation in both C2 and C3 use classes. In Preston, there is a need for 1,070 (between 2021-38) Class C3 dwellings and 833 Class C2 dwellings/bed spaces. This equates to approximately 63 dwellings per year for older people across Preston (not specifically Broughton) between 2021 and 2038. The Planning Statement does not refer to a specific need for housing for over 55s within Broughton.

It should be noted that planning permission was granted in 2020 (06/2019/1347) for 52 apartments operating as extra care residential accommodation for older persons (Class C2) within Broughton, on the site of the former Touch of Spice restaurant, and this development is almost complete. A subsequent application to vary the end use of the building (06/2020/1144) was submitted in October 2020 which proposes the 52 apartments to be affordable apartments for people over the age of 55 (Class C3). It is expected that this permission will be granted shortly and the site be operational this year.

Increased provision of affordable housing

A total of 20no. affordable dwellings are proposed, equating to an affordable housing provision of 40%. The submitted Planning Statement states that the overprovision of affordable housing is to respond to the increase in affordable housing needed in Preston, which has been evidenced through the Housing Need and Demand Assessment (HNDA, produced by Arc4 in 2022) and as reported by DLP in the published Central Lancashire Housing Study (2022). The HNDA states there is a net annual need for 377 affordable homes across Preston. The Planning Statement states that overall, the latest assessment of affordable housing needs in Preston is over 8 times higher than the Core Strategy requirement demonstrating the acute need for affordable homes in Preston.

The provision of 40% on-site affordable housing would result in an additional 2no. affordable dwellings above the minimum policy requirement.

Accessible and adaptable dwellings

The Arc4 HNDA 2022 report identifies a need for 4% of new homes in Preston to be M4(3) wheelchair accessible with all other properties to be accessible and adaptable dwellings to M4(2) standard. The Planning Statement states the proposed development offer will assist with directly meeting these needs in a sustainable location, close to services, facilities, and public transport, meaning those with disabilities do not need to travel far. The provision of higher accessibility standards is feasible as the site is generally flat with level access to good quality footpaths on Garstang Road and no difficult inclines.

The entrance to the application site is located 350m south of the centre of Broughton village, which contains a limited selection of services and facilities. Bus stops are located 180m north and 275m south of the site which at their peak, offer half hourly bus services south to Preston city centre and hourly buses north to Lancaster and Morecambe.

Larger homes for BAME households

The Arc4 HNDA (2022) report states there is a need in Preston for 7.5% of new homes to be larger with 4 bedrooms, and 1.1% to have 5 or more bedrooms to meet the needs of identified larger families, particularly those from the Asian community. The Planning Statement states the proposed development will assist with meeting the needs of these households.

The Planning Statement does not indicate how many of the dwellings will be larger homes for BAME households and also does not indicate how these properties would be secured for this demographic or if they would be open market dwellings.

Self-build Accommodation

The Planning Statement states that the developer has committed to allocating up to two plots as self-build plots. Under Section 1 of the Self Build and Custom Housebuilding Act 2015, Local Authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building.

There are four people registered on the Council's Self Build Register which has a base date of October 2020. The Council have provided a list of approved planning permissions which meet the criteria for self-build or custom house building plots and this equates to 72 dwellings. It is therefore, considered that the level of supply meets and significantly exceeds the numbers on the Council's Register.

Conclusion on Policy 1

Core Strategy Policy 1(f) states that in other places, including smaller villages and substantially built-up frontages, development will typically be small scale **and** limited to appropriate infilling, conversion of buildings and proposals to meet local need. There are two tests to this part of the policy, the first being whether the proposal is small scale. There is no definition of small scale in the Core Strategy, however, the proposed development for 51no. dwellings is categorised as major development as per the Town and Country Planning

Development Management Procedure Order 2015 (as amended) and therefore, it is not considered to be small scale.

Whilst the proposed development may contribute to meeting the need for affordable housing, accessible and adaptable and wheelchair dwellings and larger homes for BAME households, the evidence provided does not relate to Broughton, more specifically across the district of Preston. Furthermore, even if the need was sufficiently evidenced the proposal would fail with the first part of the policy test. Furthermore, the proposal would not constitute appropriate infilling, nor the conversion of buildings. Therefore, the proposed development does not comply with CS Policy 1 as a whole.

Core Strategy Policy 31

Policy 31 of the Core Strategy also seeks to protect the best and most versatile agricultural land (Grades 1, 2 and 3a) to achieve the full potential of the soil. The application site is Grade 3b and would not lead to the loss of the highest value of agricultural land. The application therefore would not conflict with Policy 31 of the Core Strategy.

Local Plan Policy EN1

Policy EN1 of the Local Plan, along with Core Strategy Policy 1 forms the spatial strategy for growth in Preston. The policy, along with the accompanying Rural Development SPD seek to direct development towards appropriate locations by protecting areas of open countryside from development which fails to meet the criteria in the policy i.e. that which is needed for the purposes of agriculture or forestry or other appropriate rural use, the re-use or re-habitation of existing buildings or infilling within small groups of buildings within smaller rural settlements. Policy EN1 also permits development which accords with either Policy HS4 or HS5 of the Local Plan. A consequence of applying the spatial strategy in Policy 1 of the Core Strategy and Policy EN1 of the Local Plan is that by restricting development in the open countryside to these exceptions the open and rural character of the open countryside is maintained. Whilst this is a consequence of applying the spatial strategy, it is not the purpose of it, the spatial strategy does not seek to protect the open countryside for its own sake.

The location of development is not within a village or settlement boundary and therefore Policy EN1 of the Local Plan applies. Policy EN1 of the Local Plan states that in locations such as those relevant to the application site, development will be limited to that needed for agricultural or forestry purposes (including proposals which help diversify the rural economy), that which is infill, or the re-use or re-habitation of existing buildings. The proposal fails to comply with any of the exceptions stated in Policy EN1, and is not a proposal which accords with Policy HS4 or Policy HS5, as such the proposed application fails to comply with Policy EN1.

Broughton Neighbourhood Development Plan Policy RES1

Policy RES1 of the Broughton Neighbourhood Development Plan allocates small-scale housing developments at three specific sites and states that "other proposed housing developments within the designated Open Countryside will be heavily restricted in accordance with Central Lancashire Core Strategy Policies 1 and 19 and Preston Local Plan Policies EN1 and EN4".

The site is not allocated within the Broughton Neighbourhood Development Plan for housing development. As stated above the proposed development is not the type of development permissible under Core Strategy Policy 1 or Local Plan Policy EN1 and so therefore, the development conflicts with Policy RES1 of the Broughton Neighbourhood Development Plan.

Emerging Neighbourhood Plan

The Planning Statement states that the revised settlement hierarchy outlined in the Emerging Local Plan takes account of the changes in Broughton and re-classifies it as a Local or Rural Centre and proposes to allocate 110 dwellings in Broughton. Central Lancashire started the consultation on Part One (Preferred Options) of the new Local Plan in December 2022.

Given the early stages of the plan, it can only be given limited weight and the proposal should still be assessed against CS Policy 1, Local Plan Policy EN1 and the Broughton Neighbourhood Plan. Furthermore, the site has not been put forward as a suggested site in the call for sites during the current consultation process and therefore, would not be considered in that process.

Conclusion on principle of proposal

The proposed development does not comply with Core Strategy Policy 1, Local Plan Policy EN1 and Broughton Neighbourhood Development Plan Policy RES1. A consequence of applying the spatial strategy in Policy 1 of the Core Strategy and Policy EN1 of the Local Plan ensures that by restricting development in the open countryside to the exceptions permitted by those policies, the open and rural character of the open countryside is maintained. Whilst this is a consequence of applying the spatial strategy, it is not the purpose of it, the spatial strategy does not seek to protect the open countryside for its own sake, in that appropriate development is permitted. The proposed development would not conflict with Policy 31. The fundamental conflict with Core Strategy Policy 1, Local Plan Policy EN1 and RES1 of the Broughton Neighbourhood Development Plan must be given significant weight. Material considerations and the benefits of the scheme that may weigh in favour of the development against the conflict will be considered later in the report.

Housing Provision

In July 2018 the revised Framework was first published, with subsequent updated versions published in February 2019 and July 2021. The Framework, along with revised Planning Practice Guidance, introduced the standard methodology as a mechanism to calculate local housing need. Paragraph 61 of the Framework states that strategic policies should be informed by a local housing need assessment conducted using the standard methodology unless exceptional circumstances justify an alternative approach.

Paragraph 74 of the Framework states that local planning authorities should identify a supply of specific deliverable sites to provide five years' worth of housing against their housing requirements set out in adopted strategic policies, such as Policy 4(a), or against local housing need where the strategic policies are more than five years old (unless the strategic policies have been reviewed and found not to require updating) with an additional buffer of 5% to ensure choice and competition in the market for land.

Policy 4 of the Core Strategy seeks to deliver a total of 22,158 new dwellings across the three Central Lancashire districts during the plan period of 2010-2026, which sets a requirement of 507 dwellings per annum for Preston. Up to January 2020 the Council used

the Core Strategy housing requirement to assess its housing land supply. However, following continued monitoring of the situation in the period of time following publication of the revised Framework in 2018 and 2019, the Council stopped using the figure in Policy 4(a) of the Core Strategy in January 2020, as it was considered the introduction and application of the standard methodology represented a significant change in circumstances in Preston, rendering the housing requirement figure in Policy 4, as well as the evidence base which underpinned it, out of date.

At April 2022 the local housing need figure calculated using the standard methodology is 266 dwellings per annum. Against this figure, at April 2022 the Council can demonstrate a 14.6 year supply of deliverable housing land.

The Council's reliance on the standard methodology has been contested by appellants at a number of public inquiries during 2021, and on 3 February 2022 the Planning Inspectorate issued its decisions relating to six appeal sites adjacent to the village of Goosnargh, one appeal site close to Longridge and one appeal site adjacent to the village of Barton. On the specific issue of housing land supply and the calculation of it, the appeal decisions relating to sites at Goosnargh and Longridge are of particular relevance.

In determining the appeals the Inspector observed that:

- i. The evidence which supported the housing requirement in Policy 4 was based on housing and demographic trends from the period 1998 – 2003 and the methodology for calculating housing need has changed materially since this time.
- ii. The practical implementation of the standard methodology in Preston almost halves the housing requirement for Preston when compared to that contained in Policy 4.

As a result, the Inspector determined that a significant change in circumstances has occurred and this renders Policy 4 out of date, and that this conclusion is supported by the Framework and Planning Practice Guidance when read as a whole.

Consequently, the Council considers that the most appropriate figure to use in assessing housing land supply is the local housing need figure and not the Core Strategy Policy 4(a) housing requirement.

As such, the Council maintains its position that by using the standard methodology it can demonstrate a 14.6-year supply of deliverable housing land. For completeness however, it is worth noting that if the Policy 4 housing requirement were to be used to assess housing land supply, as at April 2022 the Council can demonstrate a 7.5 year supply of deliverable housing land.

The tilted balance is therefore not engaged on housing land supply grounds.

Impact on the Area of Separation (AoS)

Policy 19 of the Core Strategy seeks to protect the identity, local distinctiveness and green infrastructure of certain settlements and neighbourhoods by the designation of Areas of Separation and Major Open Space, to ensure that those places at greatest risk of merging are protected and environmental/open space resources are safeguarded. In Preston, AoS are designated around Broughton, Goosnargh/Whittingham and Grimsargh. Policy EN4 of the Local Plan states that proposals will be assessed in terms of their impact upon the AoS,

including any harm to the effectiveness of the gap between settlements and also the degree to which the development would compromise the function of the AoS.

The application site is located 140m south of the southern boundary of Broughton. The next nearest settlement to the south is the Preston urban area approximately 0.65km away. The Area of Separation runs between these two settlements, and it is not considered the proposed scheme would result in the merging of the Settlements of Broughton and the Preston urban area. As such, it is considered the effectiveness of the AoS gap would be maintained and the identity and distinctiveness of the village preserved. It is therefore considered that the proposal would not cause harm to the effectiveness of the AoS and would not conflict with the above policies. The proposal not conflicting with these policies does not, however, diminish the conflict with Core Strategy Policy 1 and Local Plan Policy EN1, as those policies set out the spatial strategy for growth in Preston.

Impact on Landscape Character and Visual Amenity

The spatial strategy set out in Core Strategy Policy 1 and Local Plan Policy EN1 does not seek to protect the open countryside for its own sake, nor do these policies require an assessment of visual impact. Policy 13 of the Core Strategy requires development to conserve and where possible enhance the character and quality of the landscape. Policy 21 of the Adopted Core Strategy does not seek to prevent development in principle but does seek to ensure that any development that does take place is compatible with its surroundings, further stating that it should contribute positively to its conservation or restoration or the creation of appropriate new features. The Framework (2021) says that the intrinsic character and beauty of the countryside should be recognised, with the planning system contributing to and enhancing the natural and local environment. It does not seek to protect all countryside from development; rather it concentrates on the protection of “valued” and “distinctive” landscapes, and seeks to encourage development on previously developed land.

Policy NE2 of the Broughton Neighbourhood Plan seeks to ensure the visual impact of new development particularly that on the edge of the defined settlement of Broughton when viewed from approaching routes should be minimised by landscape screening and tree planting.

The term “valued landscape” is not defined, but the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA) advises that ‘value’ can apply to areas of landscape as a whole, or to individual elements, features and aesthetic or perceptual dimensions. The applicant has submitted a Landscape and Visual Impact Assessment (LVIA). The Landscape Character Assessment identifies this area as within the Lancashire and Amounderness Plain National Character Area, a landscape tract that is composed of a rich patchwork of pasture, arable fields and drainage ditches, on a relatively flat to gently undulating coastal landscape. The site is green field and within the open countryside and an area of separation.

The application is accompanied by a Landscape and Visual Appraisal (LVA) which aims to identify any potential landscape and visual effects of the proposed development within the site’s context. The Landscape Appraisal states that the site is comprised of a single arable field and the landscape in which the application site lies is largely influenced by suburban land uses. The site is semi-enclosed due to the predominantly well-established vegetation along the site’s perimeter, however gaps in the hedgerows allow for views of the suburban

land uses around the site. The LVA states that due to the influence of Garstang Road to the east, and existing and consented residential development along all four boundaries, the application site holds a typical settlement edge agricultural field character; with influences of urban edge characteristics. The LVA concludes that overall, the landscape effects resulting from the proposed development would be highly localised, no higher than moderate/negative, and limited to the site itself. All other effects, outside of the site, would be neutral in nature. The LVA proposes mitigation measures including: retention of existing trees and hedgerows where possible; reinforcement of boundary vegetation with new native shrub planting where there are existing gaps and native trees; proposed native trees, mixed native hedgerow planting and species-rich grassland within the public open space to the south and west.

The submitted parameters plan and indicative layout plan shows where the built development and public open space would potentially be positioned and how the site could be laid out following the creation of a central internal access road. The parameters plan indicates that hedgerows and trees could be retained and incorporated into the layout. The indicative layout suggests that the estate would have a density of development of around 19 dwellings per hectare [dph], increasing to 31 dph when open space is excluded. The Council's Landscape Architect does not disagree with the findings of the LVA, but indicates that the following objectives should be achieved, should planning permission be granted, through any future application for reserved matters: respecting the setting of the Grade II listed building to the south of the site; delivering significant biodiversity enhancements; providing public open space; accommodating sustainable urban drainage; retention of existing trees and hedgerows on all boundaries as far as possible (other than those affected by access); and providing connectivity to the Guild Wheel. The rural edge/leafy character of Broughton should be protected by protecting and widening the existing green frontage of the site, which would also respect the setting of heritage assets and protect the value of the land as a wildlife corridor. The Council's Landscape Architect considers the open space at the southern edge of the site would successfully separate the site from existing buildings and the features within the public open space should complement the existing facilities on the King George V playing fields to the north east of the site. A detailed soft and hard landscaping scheme will be required to be submitted with any future reserved matters submission, should permission be granted.

Taking the conclusions of the applicant's LVA into consideration, it is considered that whilst the proposed development would result in the loss of pasture, the site is well-contained visually and would not have a significant adverse impact on the landscape character of the area due to the site-specific conditions identified in the LVA. Residential development on a greenfield site within the open countryside, regardless of site-specifics, must, by definition cause "harm" but in this instance, that harm would be mitigated by the site-specific conditions and mitigation proposed. As such, it is considered the proposal would not conflict with Core Strategy Policy 13 and Policy 21, Broughton Neighbourhood Development Plan Policy NE2 and respect the relative aims of the Framework. The proposal not conflicting with these policies does not diminish the conflict with Core Strategy Policy 1, Local Plan Policy EN1 and Broughton Neighbourhood Development Plan Policy RES1, as these policies set out the spatial strategy for growth in Preston.

Heritage Impacts

Section 66(1) of the Planning (Listed Building and Conservation Area) Act 1990 (LBCA Act) relates specifically to listed buildings and states “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

The Framework (2021) states that heritage “...assets are an irreplaceable resource, and should be conserved in manner appropriate to their significances, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”.

Paragraph 194 of the Framework (2021) requires an applicant to describe the heritage assets affected by a proposal, and that the level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

When determining planning applications involving heritage assets, paragraph 197 states that LPAs should take account of:

- a) The desirability of sustaining and enhancing the significance of the heritage assets and putting them to viable uses consistent with their conservation;
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 requires that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets’ conservation. The more important the asset, the greater weight should be applied, and this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 200 goes on to state that any harm to, or loss of, a heritage asset requires clear and convincing justification, and substantial harm to grade II listed buildings should be exceptional, and substantial harm to a scheduled monument should be wholly exceptional.

In terms of Local Policies, Policy 16 (Heritage Assets) of the Core Strategy seeks to protect and enhance the historic environment by:

- a) Safeguarding heritage assets from inappropriate development that would cause harm to their significance; and
- b) Supporting development or other initiatives where they protect and enhance the local character, setting, management and historic significance of heritage assets, with particular support for initiatives that will improve any assets that are recognised as being in poor condition, or at risk.

Policy EN8 (Development and Heritage Assets) of the Preston Local Plan states that proposals affecting a heritage asset or its setting will be permitted where they make a positive contribution to the character and local distinctiveness through high quality new design that responds to its context, are accompanied by a satisfactory Heritage Statement that fully explains the impact of the proposal on the significance of the heritage asset and sustain,

conserve and, where appropriate enhance the significance, appearance, character and setting of the heritage asset itself and the surrounding historic environment.

The application site sits in close proximity to three Grade II listed buildings; Bank Hall and Bank Hall Farmhouse (this is a single building subdivided and will be referred to as Bank Hall) to the southwest of site, Broughton War Memorial to the southeast and the Pinfold to the northeast of site. A Heritage Statement prepared by Kathryn Sather & Associates Heritage Conservation Consultants was submitted with the application. The report identifies that Bank Hall dates from the medieval period with the listing description identifying the special interest of the building as internal; the medieval timber structure and the later inglenook fireplace. The northern property within Bank Hall is currently undergoing extensive building works, including a large extension, (approved under applications 06/2019/1084 & 06/2019/1085); it is proposed to use the front garden as car parking. The applicant's Heritage Statement concludes that the Bank Hall structure is of national significance as whilst it has undergone extensive external alteration, much of the internal timber-framed structure has been retained, despite the later sub-division of the building. It is historically significant due to the association with the Singleton Family and the Catholic Church during 16th to 18th century and contributed to the physical sub-division of the building and would have a medium level of significance.

The Broughton War Memorial was constructed after the Great War and was designed as a tall wheel-head stone cross set above a flight of stone steps and surrounded by iron railings. This was added to following the Second World War with an area of paving, railings and behind it a sandstone altar, on either side of this were panels for the names of those who had died in the Second World War. Additionally, a 'bench of contemplation' was provided on the opposite side of Garstang Road. Since this time, and the construction of the Broughton by-pass, traffic-calming works have been added to the Garstang Road between the two. The report concludes that this has the additional consequence of visually linking the two parts. The report finds the memorial has both architectural and historic significance, particularly given the associated archival evidence and would have a medium level of significance.

The Pinfold probably dates from and is associated with the turnpiking of the road from Preston to Lancaster, approved by an Act of Parliament in 1751. It is a rectangular stone enclosure, approximately 8 x 10 metres, built to a height of about 1.5 metres of roughly-squared sandstone blocks with rounded copings. There is a gate in the northwest corner with slab sides and a stone lintel which might suggest that it was predominantly for sheep, but there is also an opening in the southeast corner without a lintel. The statement notes that the 1847 OS refers to a Pound (Pinfold) some 100m to the north of the site, showing a small circular structure on the east side of the road adjacent to the Toll Cottage. The 1893 OS map shows a rectangular structure in the current position and nothing to the north. It is possible that either the 1847 map was wrong or the Pinfold was relocated and rebuilt between 1847 and 1893. The statement concludes that the structure is an example of a virtually intact later example of the declining built form associated with animal welfare and its regulation within a settlement and which would have a medium level of significance.

The statement identifies that Bank Hall is located at the end of a cul-de-sac and cannot be appreciated from Garstang Road and regardless the significance is primarily internal. The

War Memorial is visible along Garstang Road but due to greenery and a bend in the road it does not form part of longer views. The Pinfold is visible from Garstang road but obscured by housing to the north and hedging to the south.

The statement assesses the indicative layout which includes significant greenspace to the south and western edges of the application site and concludes that this would preserve the setting of Bank Hall whilst the retention of hedging and trees to the boundary with Garstang Road would avoid harm to the visually important views of the other heritage assets. The report concludes that the proposed development will not physically or visually isolate the heritage assets, although the report notes the layout is indicative and would be dealt with at reserved matters stage. In terms of the wider effects the proposal would change the agricultural field to residential development but notes this would form part of wider development to the south of the village (residential development approved on land off Sandy Gate Lane and land previously known as Key Fold Farm). It notes that the significance of the heritage assets is not dependent on the use of the application site. The views of the three heritage assets will remain unaltered by the proposed works. The development will not impact upon the ways in which the assets are experienced. The report finds that the proposed development would have a neutral impact on the setting of the heritage assets.

The submitted parameters plan details the areas of built development and public open space. This plan also included indicative landscaping arrangements to the edge of the site so that they can be conditioned at outline with precise details provided at reserved matters should permission be granted. The submitted parameters plan sets out the areas of site that would be built out with housing and would be public open space and confirms the minimum off set, which would be achieved between the area of built development and each of the listed buildings. The War Memorial is seen in the context of Garstang Road with limited wider visibility, its importance is not derived from its setting adjacent to undeveloped land, with views intended to be from the bench of contemplation on the opposite side of Garstang Road, and as such the development of the site would not harm its setting or importance. The proposed development would not impact upon the setting of the Pinfold which is seen in the context of Garstang Road and housing development to its north. Additionally, development has commenced at Key Fold Farm on the opposite side of Garstang Road to the application site and south of the Pinfold, as such its setting is characterised by residential development. Bank Hall was historically associated with farming and as such the neighbouring open land does form part of the buildings setting, however as the building is set back from Garstang Road only limited glimpses of the building are available across the application site. As noted in the submitted Heritage Statement the building has been altered externally with its primary structural significance internal, as such its setting is only considered as a positive contributor to its significance. When taking these factors into account the loss of the limited views would have a negligible impact on the asset. The impact of the proposals is therefore considered to cause less than substantial harm in accordance with paragraph 199 of the Framework.

Paragraph 202 of the Framework (2021) states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Whilst the existing immediate rural/open setting is a positive contributor to the significance of Bank Hall its contribution to the overall value/significance of Bank Hall is small/low. It is possible to achieve glimpses of Bank Hall

from Garstang Road, looking west across the application site, hence the site is part of the setting of Bank Hall. The parameter plan shows a sizeable portion of public open space to the south of the application site, which would retain some sense of openness in this part of the site, clear from built development, hence would create new opportunities for the public to view Bank Hall. Whilst the proposed dwellings would likely impinge on the some of the glimpsed views from Garstang Road, the broad band of open space would reasonably mitigate any loss of those glimpsed views by providing a publicly accessible area in which appreciation of Bank Hall could take place. This would balance out any slight (negligible) harm caused to the setting. In this case the less than substantial harm, albeit negligible, would be balanced by the public benefit of new and closer opportunities to view Bank Hall. In the event of an approval, the development should be carried out in accordance with the parameters plan, which can be secured by condition, to ensure the open space is delivered and the public benefit achieved.

Subject to the conditioning of the parameters plan, the proposed scheme would comply with Core Strategy Policy 16, Local Plan Policy EN8 and the Framework. Furthermore, in the consideration of this application the Council has had special regard to its duty in preserving the setting of the nearby heritage assets in line with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Affordable and Special Needs Housing

Policy 7 of the Core Strategy seeks to ensure on-site affordable housing provision of 30% within urban areas and of 35% in rural areas subject to such matters as financial viability and contributions to community services. The Central Lancashire Supplementary Planning Document 1: Affordable Housing states that where an element of affordable housing is required, at least 70% of the units shall be social rented or affordable rented, unless the Council is satisfied that an alternative mix meets an independently assessed proven need and agrees to such alternative provision. The SPD goes on to say that affordable units within residential developments should be dispersed to promote integration, mixed communities and to minimise social exclusion.

Up to 51no. dwellings are proposed, and affordable housing provision is required. As the site is within a rural area the required provision would be 35%. A total of 20no. affordable dwellings are proposed, equating to an affordable housing provision of 40%. This would only provide an additional 2no. affordable dwellings above being policy compliant and would accord with CS Policy 7 and the Affordable Housing SPD. The submitted Planning Statement states that the overprovision of affordable housing is to respond to the increase in affordable housing needed in Preston, which has been evidenced through the Housing Need and Demand Assessment (HNDA, produced by Arc4 in 2022) and as reported by DLP in the published Central Lancashire Housing Study (2022). The HNDA states there is a net annual need for 377 affordable homes across Preston. The Planning Statement states that overall, the latest assessment of affordable housing needs in Preston is over 8 times higher than the Core Strategy requirement demonstrating the acute need for affordable homes in Preston. There is an identified need for more affordable housing within Preston, and therefore, the provision of affordable housing is a clear benefit attracting substantial weight.

It is considered that the type, tenure and delivery of the affordable housing would be secured through a Section 106 Obligation, should planning permission be granted. It is therefore considered that the application complies with the Affordable Housing SPD and Core Strategy Policy 7 in this regard.

The proposed development also proposes special needs accommodation, by providing 10% of the total housing proposed (5 dwellings) for the over 55's, as well as assisting with the provision of accessible and adaptable M4(2) and Wheelchair M4(3) dwellings, and larger homes for BAME households.

The Preston Housing Need and Demand Assessment 2022 (Arc4 HNDA 2022) suggests there is a need in Preston for 1,070 (between 2021-38) C3 dwellings and 833 C2 dwellings/bed spaces for older persons. The Arc4 HNDA 2022 report identifies a need for 4% of new homes in Preston to be M4(3) wheelchair accessible with all other properties to be accessible and adaptable dwellings to M4(2) standard. The Arc4 HNDA (2022) report states there is a need in Preston for 7.5% of new homes to be larger with 4 bedrooms, and 1.1% to have 5 or more bedrooms to meet the needs of identified larger families, particularly those from the Asian community.

Whilst there is a need for these types of special accommodation across the city of Preston from 2021-2038, these homes can be provided in accordance with the spatial strategy for Preston to meet the needs and are not specifically needed on the outskirts of a rural village. Furthermore, the applicant has not provided a definite number of accessible or BAME homes to be included within the development. As proposed the benefit of special needs accommodation can only be given limited weight.

Design and Layout

Core Strategy Policy 17 states the design of new buildings will be expected to take account of the character and appearance of the local area, being sympathetic to surrounding land uses and occupiers and avoiding demonstrable harm to the amenities of the local area. Core Strategy Policy 5 seeks to secure densities of development which are in keeping with local areas and which will have no detrimental impact on the character, appearance, and distinctiveness of an area, whilst also making efficient use of land.

Policy EN9 of the Adopted Local Plan states that all new development proposals should be designed with regard to the principles set out and explained in the Central Lancashire Design Guide SPD, which are movement and legibility; mix of uses and tenures; adaptability and resilience; resources and efficiency; architecture and townscape. The Design Guide SPD seeks to raise the level and quality of design of new buildings, sets out a number of well-established principles of good design and how these can achieve a clear and robust design concept for a site.

Policy NE2 of the Broughton Neighbourhood Development Plan states that the visual impact of new development particularly that on the edge of the defined settlement of Broughton when viewed from approaching routes should be minimised by landscape screening and tree planting.

Policy RES2 of the Broughton Neighbourhood Development Plan requires residential development of more than 10 dwellings shall provide a range of housing to meet local needs as identified in the latest objective assessment of local housing needs.

Paragraph 126 of the Framework (2021) states that good design is a key aspect of sustainable development, and the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 134 of the Framework (2021) states permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. In addition, the National Design Guide illustrates how well-designed places can be achieved and sets out the Government's priorities for well-designed places in the form of ten characteristics.

The application is outline with access applied for and design, scale, layout and landscaping to be dealt with at reserved matters. As such these matters would be assessed as part of the relevant reserved matters application(s) which would require the proposed development to fit in with its setting, complementing the existing pattern and style of development in the area. The submitted Planning Statement includes an indicative site layout plan which demonstrates that 51no. dwellings could be comfortably constructed on site with required infrastructure and greenspace. House designs have not been provided, but the indicative plan includes a range of dwelling types and sizes and there is no reason why a suitable range of styles could not be achieved at reserved matters stage. As such in principle and subject to a suitable reserved matters application the proposal can comply with the requirements of the above policies and the Framework.

Open Space Provision

Policy 17 of the Core Strategy states that the provision of landscaping and open space should form an integral part of new development proposals, including enhancing the public realm. Policy 18 of the Core Strategy seeks to manage and improve environmental resources through the protection and enhancement of the natural environment. Policy 24 of the Core Strategy seeks to promote access to sport and recreation facilities, including children's play provision, through developer contributions where new development would result in a shortfall in provision.

Policy HS3 of the Local Plan requires this scheme to provide sufficient public open space to meet the recreational needs of the development in accordance with standards set out in the Central Lancashire Open Space and Playing Pitch SPD. On-site provision of amenity green space and active play facilities for children/young people (i.e. play equipment) would be required as the development would be over the 100 dwelling threshold level.

Paragraph 98 of the Framework (2021) states access to high quality open spaces and opportunities for sport and physical activity make an important contribution to the health and well-being of communities. Paragraph 100 also advises that Local Planning Authorities should seek to protect and enhance public rights of way and access.

The submitted parameters plan show that the Public Open Space (POS) would be located to the south of the site to provide a buffer to the nearby listed buildings. Such a proposition would offer generic benefits that would be expected from any major housing development of

this size. The maintenance and management of amenity greenspace would be secured by a Section 106 Obligation should planning permission be granted. Subject to further reserved matters submissions and conditions the proposal has demonstrated a capacity to satisfy the principle of Core Strategy policies 17, 18, 24 and Preston Local Plan Policy HS3.

Impact on Residential Amenity

Policy 17 of the Core Strategy and Policy EN9 of the Local Plan state that the design of new buildings will be expected to take account of the character and appearance of the local area, being sympathetic to surrounding land uses and occupiers and avoiding demonstrable harm to the amenities of the local area. Paragraph 180 of the Framework (2021) seeks to ensure a high standard of amenity for all existing and future occupants of land and buildings.

As the application is in outline with all matters reserved except access, issues relating to impacts on privacy, overlooking, loss of light and overshadowing cannot be fully assessed at this stage. The indicative site layout plan seeks to demonstrate that the proposed development could be satisfactorily accommodated on site without having any unacceptable adverse impacts on the amenities of neighbouring residents. There are existing properties to the north and southwest with ongoing residential development to the west and east. The indicative layout demonstrates that a suitable layout can be provided to ensure the required off set from the new residential development to the west and east could be achieved.

To the north lies no.483 Garstang Road which is located 24m at its closest point from the northern edge of the application site which is sufficient to prevent any unacceptable harm in terms of amenity. To the southwest of the application site is a cluster of properties around Bank Hall, with the closest dwelling a converted barn north of Bank Hall, which is a minimum of 6m from the boundary with application site. The parameters plan proposes landscaping and open space within the application site in this area and as such would allow an appropriate offset to be maintained to avoid any unacceptable impact to the dwellings south west of the application site.

The Council's Environmental Health Officer recommends that a condition requiring a Construction Environmental Management Plan in relation to noise, dust and air quality is attached to any future permission granted, to ensure neighbouring amenity is not unacceptably impacted during construction. It is therefore considered that the proposal would not conflict with the above policies.

Traffic and Highway Safety

Core Strategy Policy 2 states that the Local Planning Authority will work with infrastructure providers to establish works that will arise from or be made worse by development proposals. It further states that the Local Planning Authority will set broad priorities on the provision of the infrastructure to ensure that it is delivered in line with future growth. Core Strategy Policy 3 outlines a number of measures which are considered to constitute the best approach to planning for travel. These include reducing the need to travel, improving pedestrian facilities, improving opportunities for cycling, improving public transport, enabling travellers to change their mode of travel on trips, encouraging car sharing, managing car use and improving the road network.

Policy ST2 of the Adopted Local Plan requires development proposals to demonstrate that the efficient and convenient movement of all highway users and corridors which could be developed as future transport routes are not prejudiced, that existing pedestrian, cycle and equestrian routes are protected and extended; the needs of disabled people are fully provided for; appropriate provision is made for vehicular access, off-street servicing, vehicle parking and public transport services; and that appropriate measures are included for road safety and to facilitate access on foot and by bicycle. Adopted Local Plan Policy ST1 requires new development proposals to provide car parking and servicing space in accordance with the parking standards contained within the Appendix B to the Adopted Local Plan.

Paragraph 111 of the Framework (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The submitted Transport Statement states the access to the proposed development will be taken from Garstang Road, which forms the eastern boundary of the site. The proposed access plan shows the site access road give-way to the segregated Guild Wheel cycle route on Garstang Road. This arrangement is the same as the layout currently provided at the existing junction immediately to the south of the site (minor road also named Garstang Road). Although cycle speeds will likely be less than 20mph, a visibility splay of 2.4m x 22m can be achieved in both directions at the give-way onto the cycle route and at the give-way onto Garstang Road.

In addition, the proposed access plan shows a proposed pedestrian/cycle connection to the southeast of the site. The location of the connection has been chosen where there is the minimum level difference between Garstang Road and the site. The TS states that although the internal layout will form part of a reserved matters planning application, the pedestrian/cycle connection will be taken account of when finalising the layout.

A swept path analysis has been carried out to demonstrate that a refuse vehicle can enter and exit the proposed site access and access the approved residential development to the north east of the site (Key Fold Farm) on the opposite side of Garstang Road. Drawing 10535/5501/002 Revision B shows a large refuse vehicle turning left out of the proposed site access and turning right into the Key Fold Farm site access, and vice-versa.

The proposed development will provide upgrades to the existing two bus stops on Garstang Road, south of the site. The bus stops are currently formed of a flag only and it is proposed to upgrade these bus stops to provide a shelter. County Highways advise that the proposed upgrade is acceptable in principle and the detailed design of the bus stops will form part of the Section 278 Agreement should planning permission be granted. This would improve the quality of the wait time for those using the bus service, however, would not improve the frequency or routes of the bus service. The benefit would be limited to those using the two bus stops to be upgraded and therefore, attracts limited weight.

County Highways state that the amended site access is acceptable and there are no highway objections subject to the recommended conditions requiring the submission of a scheme for the new site access/junction, the new estate road/access shall be constructed in accordance

with the LCC's Specification for Construction of Estate Roads, submission of details relating to the arrangements of the management and maintenance of the proposed streets, provision of the approved car parking areas, submission of the condition of the highway, provision of wheel cleaning facilities, provision of electric vehicle charging points and cycle parking.

The County Engineer also requests a condition be attached requiring the applicant to undertake a survey of the condition of the adopted highway prior to work commencing on site and then the developer repairing any damage caused to the highway during the construction process. Whilst the Local Planning Authority acknowledge the rationale for such a condition being recommended, it is considered that such a condition is unreasonable and unenforceable as it would be very difficult to prove that any damage to the adopted highway was specifically caused by vehicles associated with this development, particularly given the busy nature of Garstang Road and the residential development being undertaken on the east side of Garstang Road the amount of large vehicles that will use these highways. As such this condition has not been added to the recommendation.

National Highways note that the expected trip generation within the submitted Transport Statement is not anticipated to have a traffic impact on the strategic road network (SRN) that could be considered severe. They note that there are a number of planning approvals within the area and cumulatively this could impact upon the SRN and this should be considered. They, however, raise no objection subject to a condition requiring a travel plan to be in place should approval be granted.

Ground Conditions

Policy EN7 of the Adopted Local Plan seeks to address existing contamination of land by appropriate mitigation measures to ensure the site is suitable for the proposed use and seeks to ensure that proposed development would not cause land to become contaminated.

Paragraph 183 of the Framework (2021) states planning decisions should ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation. After remediation, as a minimum the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. Paragraph 184 of the Framework (2021) goes on to state that where a site is affected by contamination or land stability issues, the responsibility for securing a safe development rests with the developer and/or landowner.

The application is accompanied by a Phase 1 Desk Study prepared by Brownfield Solutions Ltd. The study identifies a potential for contamination at the application site with infilled ponds, an electrical substation and a pump within and in the vicinity of site with the study recommending further investigation. The Council's Environmental Health Officer states as per the recommendations of the Phase 1 Desk Study Assessment, an intrusive Phase 2 Geo-Environmental Site Investigation should be undertaken, which could be secured by condition should planning permission be granted. Subject to said condition the scheme would be acceptable in accordance with the above policy and the Framework.

Flood Risk and Drainage

Core Strategy Policy 29 seeks to improve water quality, water management and reduce the risk of flooding by number of measures including minimising the use of portable mains water in new developments; appraising, managing and reducing flood risk in new developments; managing the capacity and timing of development to avoid exceeding sewer infrastructure capacity; encouraging the adoption of Sustainable Drainage Systems; and seeking to maximise the potential of Green Infrastructure to contribute to flood relief.

The BNDP Policy NE3 states that Sustainable drainage schemes shall be used to drain land wherever possible:

1. for development
2. where waterlogging is an obstacle to use of public open spaces or to enjoyment and use of public rights of way
3. to provide wildlife areas.

Paragraph 167 of the Framework (2021) states that Local Planning Authorities should ensure flood risk is not increased elsewhere (i.e. outside areas at risk of flooding) and only consider development appropriate in areas at risk of flooding where proposals are informed by a site-specific flood risk assessment.

The application site is located within Flood Zone 1 which has the lowest probability of flooding. The initial Drainage Strategy has been updated to provide appropriate minimum operation standards for peak flow and volume control and provide an appropriate allowance for climate change following an objection from the Lead Local Flood Authority (LLFA). The Drainage Strategy states this is an outline application demonstrating sufficient space can be provided to attenuate surface water runoff from the proposed development (i.e. retention pond). The pond has been designed to allow for a permanent water level (i.e. 300mm) to improve amenity and biodiversity aspects. The drainage calculations and drawings will be refined at detailed design stage once the layout has been fixed by the developer. At this stage, additional SuDS features can be integrated into the layout (i.e. trapped gullies, permeable paving, interceptor, etc.) to improve water quality. Permeable paving could be used on driveways and/or cul-de-sacs. The LLFA withdrew their objection as the amended drainage strategy is considered to be acceptable subject to conditions requiring the development to be carried out in accordance with the submitted Flood Risk Assessment, Surface Water Sustainable Drainage Strategy and Sustainable Drainage Pro-forma, and the submission of: the final Surface Water Sustainable Drainage Strategy; a Construction Surface Water Management Plan; a Sustainable Drainage System Operation and Maintenance Manual; and a Verification Report of the constructed sustainable drainage system.

United Utilities note that the site overlies a Groundwater Source Protection Zone 2 and 3. They state the applicant should follow best practice on their use and storage of fuels, oils and chemicals, to remove the risk of causing pollution during construction. They draw attention to advice in The Environment Agency's Approach to Groundwater Protection, which can be added as an informative should the application be approved. In the event of an approval they recommend conditions requiring approval of any penetrative foundation designs, surface water drainage scheme based on the hierarchy of drainage and separate foul and surface water drainage.

Subject to the inclusion of the above conditions the application proposals are considered acceptable in accordance with the above policies and the Framework.

Ecology

Policy 22 of the Core Strategy seeks to protect and find opportunities to enhance and manage the biological and geological assets of the area through certain measures, such as promoting the conservation and enhancement of biological diversity, having particular regard to the favourable condition, restoration and re-establishment of priority species and species populations; and seeking opportunities to conserve, enhance and expand ecological networks. Policy 17 seeks to ensure that all developments protect existing landscape features and natural assets, habitat creation and provide open space.

Policy EN10 of the Adopted Local Plan seeks to protect, conserve, restore and enhance biodiversity and ecological network resources in Preston. Policy EN11 states planning permission will not be granted for development which would have an adverse effect on a protected species unless the benefits of the development outweigh the need to maintain the population of the species in situ. Should development be permitted that might have an effect on a protected species planning conditions or obligation will be used to mitigate the impact.

Paragraph 174 of the Framework (2021) states that planning policies and decisions should, amongst other things, contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Paragraph 180 of the Framework (2021) states that when determining applications, Local Planning Authorities should aim to conserve and enhance biodiversity by applying a number of principles. Where development would result in significant harm to biodiversity, which cannot be mitigated, or the development would result in the loss or deterioration of irreplaceable habitats without exceptional reasons, planning permission should be refused.

The application is accompanied by an Ecological Survey and Assessment and an Assessment of Biodiversity Net Gain Report (dated July 2021) and an updated Ecological Survey and Assessment (dated December 2022). The Ecological Survey (2021) concludes that the site supports habitats within the site that are of only local, and in part, limited value to biodiversity. The updated 2022 survey concludes that there would not be an adverse impact on protected species, including badgers, bats and nesting birds. The great crested newt eDNA presence/absence survey was negative in 2021 and it is considered necessary to ensure reasonable avoidance measures as detailed in paragraph 5.3.12 of the 2022 survey are applied during the construction phase of the development. The recommendations of the updated Ecological Survey and Assessment dated December 2022 can be secured by way of a planning condition should planning permission be granted.

In terms of biodiversity net gain, the 2021 survey states that when using the Biodiversity Metric 2.0 Calculation Tool there would be an on-site net gain of 33.34% for habitat units and 10.44% hedgerow units. If vegetated gardens were not counted in the calculation (and 1.65ha of the site was developed land) the site can achieve a total net gain of 8.94% for habitat units and 10.44% for hedgerow units. The 2021 survey details that net gain will be achieved through creating habitats in buildings, gardens, new ponds, wildflower grassland, public open space as well as retaining and planting new hedgerows.

The 2022 updated Ecological Survey and Assessment does not include any updated information regarding net gain and since the initial 2021 survey, the Biodiversity Metric Calculation has been updated to 3.1 which should be used to calculate net gain from April 2022.

The Greater Manchester Ecology Unit (GMEU) Ecologist agrees with the findings of both reports, and recommends a suite of conditions be attached, should planning permission be granted, to ensure the development has no adverse impact on protected species and achieves biodiversity net gain. These conditions include:

- The development proceeds in accordance with the recommendations and ecological enhancements measures set out in the Ecology Survey;
- Implementation of protection measures for retained trees, hedgerows and scrub;
- Design of the external lighting scheme for construction and operation;
- Any removal of trees marked as retained should include a further assessment of their suitability to support roosting bats;
- Reasonable Avoidance Measures should be followed during site clearance;
- Boundary treatments should allow provision for small mammal/amphibian gaps; and
- A full landscaping specification should be submitted at reserved matters stage including the features shown within the indicative layout proposing ecological enhancements.

The GMEU ecologist also requests a condition requiring vegetation clearance to avoid the bird nesting season (March-August), however as this is covered by separate legislation, such advice would be attached as an informative. Subject to the above conditions, if planning permission is granted, it is considered the proposed development would not have an adverse impact on protected species. As such, the proposal complies with the above policies and the Framework in this regard.

Employment Skills

Policy 15 of the Core Strategy seeks to improve skills and economic inclusion and the Central Lancashire Employment Skills SPD requires all major applications proposing 30no. or more residential units to produce an Employment and Skills Statement and Action Plan.

An Employment Skills Statement (ESS) was not submitted with the application and not provided when requested by the Case Officer. The applicant states that because the application is outline for up to 51 dwellings which may result in a reserved matters development for a lesser number then an ESS cannot be submitted at this stage. They have requested that a condition be attached to require an ESS and ESS Action Plan be submitted prior to development or submitted with the reserved matters. However, this would not enable the monitoring of the ESS Action Plan to be secured by planning obligation as both the contents of the ESS Action Plan and level of financial contribution towards monitoring are intrinsically linked to the contents of the ESS. Therefore, without at ESS prior to the determination of the application, the applicant fails to comply with Policy 15.

Air Quality

Policy 30 of the Core Strategy seeks to improve air quality through delivery of Green Infrastructure initiatives and through taking account of air quality when prioritising measures

to reduce road traffic congestion. Policy 3 of the Core Strategy seeks to encourage the use of alternative fuels for transport purposes.

The site does not fall within an Air Quality Management Area and the Environmental Health Officer has raised no objections to the scheme in terms of its impact on air quality. To encourage the use of alternative fuels and improve the air quality of the city, it is considered a condition be attached, should planning permission be granted, requiring a scheme for the installation of electric vehicle charging points to be submitted. Subject to this condition, it is considered the proposal complies with Policies 3 and 30 of the Core Strategy.

Energy Efficiency

In December 2021 the Government published a new Part L of the Building Regulations with an implementation date of 15 June 2022. Under the new Part L all new homes will be expected to produce 31% less CO₂ emissions than is acceptable in the 2013 version of Part L of the Building Regulations. All building work approved under the 2013 Part L will need to be commenced before June 2023 so long as plans or notices were submitted prior to 15 June 2022 to a Building Control Body. The Government has stated a further update to Part L is currently due to be issued in 2025, which will demand new homes produce at least 75% less carbon emissions than the 2013 regulations.

Core Strategy Policy 27 seeks to secure energy performance standards that exceed the 2013 Building Regulations, i.e. lower carbon emissions than the 2013 Part L. As the new Approved Part L 2021 of the Building Regulations requires even lower carbon emissions in all new homes, it is unnecessary for the Local Planning Authority to continue to apply Core Strategy Policy 27, and in this regard Core Strategy Policy 27 is considered to be out of date for new residential developments.

Waste Management

The National Planning Policy for Waste seeks to ensure that new development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities, for example by ensuring there is discrete provision for bins to facilitate a high quality, comprehensive and frequent household collection service.

Whilst no details of waste provision have been provided, the indicative site plan indicates there would be sufficient space to the rear of the proposed dwellings to accommodate waste and recycling facilities. The Council's Waste Technical Officer has advised that shared driveways and collection points should be avoided as they generally increase the distance residents have to travel to present bins on collection days, also they have a negative impact on the visual amenity of an area. It should be noted that as a general rule, distances over which residents have to manoeuvre waste containers should be minimised wherever possible; occupiers should have to move waste containers no more than 25m in the horizontal plane to reach the collection point. To ensure adequate provision is made for waste and recycling, should planning permission be granted, the above further details would be required at reserved matters stage. Subject to these details, it is considered the proposal would comply with the National Planning Policy for Waste.

Education

Policy 14 of the Core Strategy states that educational requirements will be provided for by enabling seeking contributions towards the provision of school places where a development would result in or worsen a lack of capacity at existing schools.

County Education have made a claim for the applicant to financially contribute to the provision of 19 primary school places (£338,713) and 8 secondary school places (£198,024), based on the assumption that all of the proposed 51no. dwellings would have 4 bedrooms. Should this not be the case a reassessment will be required at reserved matters stage and could result in a reduced claim for school places. Should planning permission be granted the section 106 obligation shall include a methodology for recalculating the claim for education based on the number of bedrooms per dwelling.

Planning Contributions

Regulation 111(2) of the Community Infrastructure Levy Regulations 2010 (as amended) and paragraph 57 of the Framework (2021) state that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:

- a) Necessary to make the development acceptable on planning terms;
- b) Directly related to the development; and
- c) Fairly and reasonably related in scale and kind to the development.

The contribution towards primary and secondary school places is considered to comply with the tests set out above as it would mitigate the education impacts of the proposed development which would otherwise not be provided. The level of on-site affordable housing provision is considered to comply with the tests set out in Regulation 122(2) and the Framework as it would represent 40% of the total number of dwellings on the site, with the remaining 60% of the housing being made available to purchase on a normal open market basis. The requirement to secure the future management and maintenance of the open space is considered to comply with the above tests as it would be directly related to the on-site public open space and would secure its long-term management to allow the space to be used by future residents.

Tilted Balance

A lack of housing land supply is not the only reason why the tilted balance could be engaged, it can also be engaged if the most important policies for determining the application are in the round out-of-date. The assessment as to whether it is appropriate to engage the tilted balance in Paragraph 11(d) of the Framework (2021) is comprised of three stages. Firstly, the most important policies for determining the application must be identified. Secondly, those policies must be assessed to ascertain whether or not they are out-of-date. Thirdly the basket of policies must be looked at to determine if, in the round, it is out-of-date thereby engaging the tilted balance.

The most important policies for determining this planning application are considered to be:

Central Lancashire Core Strategy

Policy 1: Locating Growth

Policy 4: Housing Delivery

Preston Local Plan 2012-2026 (Site Allocations & Development Management Policies)
Policy EN1: Development in the Open Countryside

Broughton Neighbourhood Development Plan

Policy RES1: Broughton Village – Housing Development sites as an extension to the settlement boundary

Core Strategy Policy 1 and Policy EN1 are relevant to the principle of the development proposed. Policy 4 is housing-related and contains the housing requirement figure for Central Lancashire. It has been accepted earlier in this report that Core Strategy Policy 4 is out of date. However, whilst the minimum housing requirement of Policy 4 is out-of-date, it does not follow that other most important policies for determining the application are out-of-date.

Core Strategy Policy 1 promotes the spatial strategy for growth across Central Lancashire. For Preston this means focussing growth and investment in the main urban area (comprising of the Central Preston Strategic Location and adjacent inner city suburbs), the Cottam Strategic Site, the North West Preston Strategic Location and the Key Service Centre of Longridge. Policy 1 does not unreasonably constrain the ability of Preston to accommodate its local housing need calculated by way of the standard methodology. Policy 1 is therefore not out-of-date.

Policy EN1 restricts development which takes place in the open countryside to that needed for the purposes of agriculture and forestry (or other rural appropriate uses), the re-use of existing buildings and infill within groups of buildings, as well as development permissible in other policies contained within the Local Plan (namely Policies HS4 and HS5). Given the local housing need in Preston (254 net additional homes per annum) is currently substantially below the housing requirement contained in Policy 4 (507 net additional homes per annum), it is clear that more than sufficient land has been allocated in the current Local Plan to meet the local housing need. Policy EN1 does not unreasonably constrain the ability of Preston to accommodate its local housing need calculated by way of the standard methodology. As a consequence, the rural settlement boundaries do not need to be reconsidered at this time and remain relevant and up-to-date. Policy EN1 is therefore not out-of-date.

BNDP Policy RES1 allocates small-scale housing developments at three specific sites within the plan area. BNDP Policy RES1 does not unreasonably constrain the ability of Preston to accommodate its local housing need calculated by way of the standard methodology. BNDP Policy RES1 is therefore not out of date.

As three of the four most important policies for determining this application are not out of date, the basket of most important policies is not out of date and accordingly the tilted balance is not engaged.

Value Added to the Development

An updated Transport Statement has been submitted to address concerns raised by County Highways.

3.8 Conclusions

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts the determination must be in accordance with the plan unless material considerations indicate otherwise.

The application site is located in the open countryside as shown on the policies map of the Preston Local Plan 2012-2026 (Site Allocations and Development Management Policies). The proposed development would be contrary to the hierarchy of locations for focussing growth and investment at urban, brownfield, allocated sites, sites within key service centres and other defined places, contrary to Core Strategy Policy 1. The proposed development is not the type of development deemed permissible under Local Plan Policy EN1 and the loss of open countryside for the development proposed is therefore contrary to this policy. Furthermore, the proposal does not comply with Policy RES1 of the Broughton Neighbourhood Development Plan. The proposal is, therefore, not acceptable in principle and the fundamental conflict with the development plan is given significant weight in the planning balance.

The proposal is not considered to impact on the settings of the grade II listed Broughton War Memorial or the Pinfold. There would be harm to the significance of the settings of the grade II listed Bank Hall but this would be less than substantial and would be balanced by the positive benefit of improved visibility, which would be provided from the proposed public open space. In the consideration of this application the Council has had special regard to its duty to preserve the setting of the nearby heritage assets in line with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Statutory consultee comments and representations have been received which have been carefully considered and taken into account as part of assessing this planning application. The proposal would not have an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would not be severe. The proposal is suitably distanced from the surrounding neighbouring properties and therefore, would not have an adverse impact on residential amenity. Whilst the proposed development is contrary to the management of growth and investment set out in the Core Strategy and is not the type of development deemed permissible in the open countryside under Local Plan Policy EN1, the proposed development would not cause harm to the effectiveness of the Area of Separation and would not result in an adverse impact on the character and appearance of the open countryside. There would be no unacceptable harm to protected species and their habitats due to mitigation measures that could be secured by condition. Any harm arising from potential contamination and flood risk could be mitigated by condition.

The proposed development would provide up to 51no. dwellings, of which up to 20 (40%) would be affordable. The provision of affordable housing is a clear benefit attracting substantial weight. The proposal includes the provision of an area of open space. Whilst its provision is largely to meet the needs of the proposed development it would be accessible by the wider community and would also open up the views of the surrounding listed buildings. As such this benefit attracts moderate weight. The application also proposes special needs accommodation, by providing 10% of the total housing proposed (5 dwellings) for the over

55's as well as assisting with the provision of accessible and adaptable M4(2) and Wheelchair M4(3) dwellings, and larger homes for BAME households. Given the lack of detail proposed in this application the benefit of special needs accommodation can only be given limited weight. The proposal seeks to upgrade two bus stops to the south of the application site. The benefit would be limited to those using the two bus stops to be upgraded and therefore, attracts limited weight. The development would achieve positive Biodiversity Net Gain on site, however given there are no up-to-date calculations using the updated biodiversity metric, this ecological benefit attracts limited weight. The proposal would be energy efficient and electric vehicle charging points could be secured by way of planning condition. However, these benefits, with the exception of affordable housing and open space, are generic and no more than would be expected from any major housing development and as such they attract limited positive weight in the balance against the conflict with the development plan.

The proposed development offers up to two plots as self-build plots, however at present the level of supply meets and significantly exceeds the numbers on the Council's Self Build Register and this benefit carries no weight. Furthermore, the applicant has been unwilling to engage with the Council's community wealth building agenda, by failing to submit an ESS prior to the determination of the application. Hence the offer of addressing this matter at reserved matters stage would not achieve the benefits intended, therefore no positive weight can be attributed in the balance.

The planning acts require that an application is determined in accordance with the development plan unless material considerations indicate otherwise. This is commonly referred to as the "flat balance". The titled balance, set out in the Framework, does not apply in this case. Paragraph 12 of the Framework states that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making.

The adverse impact of this development is a fundamental conflict with the development plan spatial strategy for Central Lancashire. This strategy seeks to direct development to the most sustainable higher order centres and minimise development in the lower order centres such as Broughton. With regards to material considerations, the contribution to market and affordable housing attracts substantial weight. The provision of special needs accommodation, the upgrade of two bus stops and positive Biodiversity Net Gain on site are all benefits that attract limited weight. The provision of open space is a benefit that attracts moderate weight. However, when balanced against the fundamental conflict with the spatial strategy and the very healthy supply of housing land, cumulatively these benefits do not outweigh the conflict with CS Policy 1 and LP Policy EN1 and the development plan taken as a whole, therefore planning permission should be refused.

3.9 Recommendation

Refusal for the reason as set out in paragraph 2.1.

APPENDIX 19:

329 Preston Road – Committee Meeting Minutes

Planning Committee

Planning Committee 5 November 2020

Present: Councillor Iqbal in the Chair; Councillor Borrow, Vice-Chair;
Councillors Bax, Darby, Ms Eaves, Landless, Mein, Moss, Shannon
and Mrs Whittam

Apologies: Councillors Morgan

**Officers in
attendance:**

Mrs N Beardsworth	– Head of Development Management and Building Control
Mr R Major	– Principal Planning Officer
Mr J Mercer	– Principal Planning Officer
Mr B Sandover	– Senior Planning Officer
Mr C Blackburn	– Planning Policy Team Leader
Mr I Blinkho	– Senior Legal Officer
Mr Z Bapu	– Senior Member Services Officer

PL42 Chair's Announcements

The Chair invited Ms N Beardsworth to give an update on the Central Lancashire Local Plan Memorandum of Understanding and Statement of Co-Operation relating to the provision and distribution of housing land supply. Ms Beardsworth gave a presentation to the Committee.

The Chair thanked the Officers for their efforts whilst undertaking Covid work whilst the Authority area was designated as an Area of Intervention. As a result of this the previous meeting had to be cancelled.

PL43 Notification of Substitute Members

There were none.

PL44 Declarations of Interests

Councillor Mein declared her personal and prejudicial interest in application 06/2020/0652 insofar as she was a Board Member of Community Gateway Association.

Planning Committee

PL45 Minutes

Resolved - That the minutes of a meeting of this Committee held on 3 September 2020 be noted and signed as a correct record.

PL46 Planning Applications List

The Director of Development submitted reports on six applications for consideration by the Committee.

He also submitted a schedule of 206 applications, all of which had been determined or processed by him under delegated powers.

Resolved – That the schedule of delegated decisions be noted.

(Mr Hacking, objector representing the Barton Parish Council addressed the Committee on the following item.)

PL47 06/2020/0614 - Cardwells Farm

The Director of Development and Housing presented a report on an outline application for up to 151 dwellings and community building with associated works (access applied for only) (re-submission of outline application (06/2019/0752) at land at Cardwells Farm, Garstang Road.

Resolved – That the application be refused for the reason outlined in the report.

All Members (10) voted in favour of the resolution.

(Ms Ryan, agent for the applicant, addressed the Committee on the following item.)

PL48 06/2019/1275 - Tabley Lane (200)

The Director of Development and Housing presented a report on an outline planning application for up to 200 dwellings (Class C3), public open space, landscaping and associated engineering operations (access applied for only) at land North of Tabley Lane.

Resolved – That i) subject to a Section 106 obligation being secured for a financial contribution towards off-site affordable housing, the future management of the public open space and the East-West Link Road, planning permission be granted subject to conditions listed in the report; and

Planning Committee

ii) in the event that a satisfactory Section 106 obligation is not concluded by 6th November 2020, or other agreed extension of time, delegate authority to the Director of Development and Housing to refuse planning permission on the grounds that the obligations which make the development acceptable have not been legally secured.

All Members (10) voted in favour of the resolution.

(Mr Cox, agent for the applicant, addressed the Committee on the following item.)

PL49 06/2019/0856 - Avenham Street

The Director of Development and Housing presented a report on an application for four blocks ranging from seven to sixteen storeys high, comprising of 294 one and two bedroom residential apartments with basement parking, associated external works and landscaping at the car park on Avenham Street.

Resolved – That the application be approved subject to conditions listed in the report and the additional conditions (24-27) outlined in the late changes report.

All Members (10) voted in favour of the resolution.

(Ms Leggett, agent for the applicant, addressed the Committee on the following item.)

PL50 06/2018/0732 - 126A Whittingham Lane

The Director of Development and Housing presented a report on an outline application for up to 111 dwellings and associated works following demolition of 126A Whittingham Lane and with all matters reserved except for access at land to the rear of 126A Whittingham Lane, Broughton

Resolved – That the application be refused for the reason outlined in the report.

All Members (8) voted in favour of the resolution except for Councillors Bax and Moss (2) who voted against.

(Ms Smith, agent for the applicant, addressed the Committee on the following item.)

PL51 06/2018/1157 - 329 Preston Road

The Director of Development and Housing presented a report on an outline planning application for 30 dwellings and associated infrastructure with

Planning Committee

access from Preston Road (all other matters reserved) land adjacent 329 Preston Road.

The Director recommended that the application be refused.

Contrary to the advice of the Director of Development and Housing it was moved and seconded that subject to conditions and a Section 106 Obligation planning permission be granted for the following reason:

The village has been extended in the past, to the south of Preston Road, and therefore it is not considered that this development would result in a further extension of the village into Open Space. The development would constitute infill development, and would provide affordable housing. The benefits of the development would outweigh the conflict with the Development Plan.

The Chair put the motion to a vote and it was

Resolved – That i) subject to a S106 obligation being secured for providing on-site affordable housing, education provision and the future management of the public open space, planning permission be granted subject to conditions listed in the report which was presented to Committee on 5 March 2019; and

ii) in the event that a satisfactory Section 106 obligation is not concluded by 12 November 2020, or other agreed extension of time, delegate authority to the Director of Development and Housing to refuse planning permission on the grounds that the obligations which make the development acceptable have not been legally secured.

All Members (8) voted in favour of the resolution except for Councillors Landless and Mrs Whittam (2) who voted against.

(Councillor Mein left the meeting during consideration of the following item.)

PL52 06/2020/0652 - Tom Benson Way

The Director of Development and Housing presented a report on an application for 35 dwellings on land off Tom Benson Way.

Resolved – That i) subject to a Section 106 Obligation being secured providing for 30-100% on-site affordable housing provision, the provision of surface upgrades to the Canal towpath, and management and maintenance of amenity greenspace on-site, planning permission be granted subject to conditions listed in the report including the amended and additional condition outlined in the late changes report ; and

Planning Committee

ii) the event that a satisfactory Section 106 Obligation is not concluded by 12th November 2020, or other agreed extension of time, delegate authority to the Director of Development to refuse planning permission on the grounds that the obligations which make the development acceptable have not been legally secured.

All Members (9) voted in favour of the resolution.

(Councillor Mein returned for the remainder of the meeting.)

PL53 Recent Planning Appeals - Decisions and Submissions

The Director of Development submitted a report on Planning Appeals and Performance.

Resolved – That the report be noted.

PL54 Date of Next Meeting

The date of the next ordinary meeting of this Committee is Thursday 3 December 2020 at 10.00am.

APPENDIX 20:

Strategic Housing Market Assessment (GL Hearn) (2017)



GL Hearn

Part of Capita Real Estate

Central Lancashire Strategic Housing Market Assessment

Preston, South Ribble and Chorley Councils

Final Draft Report, September 2017

Prepared by

GL Hearn

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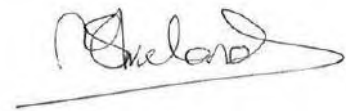
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Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by the Originators and approved by a Business or Associate Director.

DATE	ORIGINATORS	APPROVED
September 2017	Nena Pavlidou, Planner Paul McColgan, Associate Planning Director	Nick Ireland, Planning Director



Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 INTRODUCTION

1.1 GL Hearn (GLH) and Justin Gardner Consulting (JGC) have been commissioned by Preston City Council, Chorley Council and South Ribble Borough Council to develop a Strategic Housing Market Assessment (SHMA). The purpose of the SHMA is to develop a robust understanding of housing market dynamics, to provide an assessment of future needs for both market and affordable housing and the housing needs of different groups within the population.

1.2 **The SHMA does not set housing targets. It provides an assessment of the need for housing across the functional Housing Market Area (HMA), making no judgements regarding future policy decisions which the Councils may take.** Housing targets will be set in local plans. The SHMA provides forms part of an evidence base in considering whether housing targets should be reviewed, but any review of the housing targets set out in local plans, or in this case in the Central Lancashire Joint Core Strategy, if required would need to take into account factors such as the supply of land for new development, Green Belt and other nationally and internationally significant landscapes and environmental designations, local infrastructure capacity and environmental constraints as appropriate. These factors may limit the amount of development which can be sustainably accommodated and influence the distribution of development within the Housing Market Area. The SHMA's principle role is to consider housing need across the HMA, and greater weight should be given to its findings at this level (rather than the individual local authority figures) given the range of influences on housing needs at a local level and functional links between areas within the functional HMA.

1.3 The SHMA responds to and is compliant with the requirements of the National Planning Policy Framework (the NPPF)¹. It is informed by Planning Practice Guidance (PPG)². It provides assessment of the future need for housing, with the intention that this will inform future development of planning policies. According to the PPG, housing need:

“refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.”

1.4 This report, in discussing housing need, is thus referring to both the need for market and affordable housing across the housing market area, taking account of both local need and that associated with net migration. This is required by national policy.

¹ CLG (March 2012) *National Planning Policy Framework*

² CLG *Planning Practice Guidance – Assessment of Housing and Economic Development Needs* - <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/>

- 1.5 The SHMA provides specific evidence and analysis of the need for different sizes of homes, to inform policies on the mix of homes (both market and affordable). The SHMA also analyses the needs of specific groups within the population, such as older people and students.

National Planning Policy Framework and Guidance

- 1.6 The Coalition Government (2010-15) reformed the policy framework for planning for housing. Regional strategies were revoked and responsibility for planning on cross-boundary issues was returned to local authorities.
- 1.7 The primary legislation to support this was the 2011 Localism Act which now imposes a 'duty to cooperate' on local authorities, requiring them to **“engage constructively, actively and on an on-going basis” with the other authorities and relevant bodies.** **The Duty to Cooperate is applied as both a legal and soundness test to which development plans must comply. Housing provision is an issue of cross-boundary relevance which local authorities both within and beyond the HMA will need to engage with each other on.** The emphasis on Councils working jointly to assessing need across an HMA and then working together to meet that need is a theme which runs through national planning policies.
- 1.8 National policies for plan-making are set out within the National Planning Policy Framework. This sets out key policies against which development plans will be assessed at examination and to which they must comply.

National Planning Policy Framework (NPPF)

- 1.9 The National Planning Policy Framework (NPPF) was published in March 2012. The Framework sets a presumption in favour of sustainable development whereby Local Plans should meet objectively assessed development needs, with sufficient flexibility to respond to rapid change, unless the adverse impacts of doing so would significantly or demonstrably outweigh the benefits or policies within the Framework (including policies relating to Green Belt and other nationally and internationally significant landscapes and environmental designations) indicate that development should be restricted.
- 1.10 Paragraph 47 sets out that to boost significantly the supply of homes, local planning authorities should use their evidence base to ensure that their local plan meets the full objectively-assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.
- 1.11 The NPPF highlights the Strategic Housing Market Assessment (SHMA) as a key piece of evidence in determining housing needs. Paragraph 159 in the Framework outlines that this should identify the

scale and mix of housing and the range of tenures which the local population is likely to need over the plan period which:

- Meets household and population projections, taking account of migration and demographic change;
- Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community; and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.

- 1.12 This is reaffirmed in the NPPF in Paragraph 50. The SHMA is intended to be prepared for the housing market area, and include work and dialogue with neighbouring authorities where the HMA crosses administrative boundaries. A number of local plan examinations have demonstrated the importance of properly identifying and addressing the housing market area as a whole³ and collaborative working on issues related to housing need is expected.
- 1.13 Paragraph 181 sets out that Local Planning Authorities (LPAs) will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examining. This highlights the importance of collaborative working and engaging constructively with neighbouring authorities, as required by Section 33A of the 2004 Planning and Compulsory Purchase Act, and ensuring that there is a robust audit trail showing joint working to meet the requirements of paragraph 181 of the NPPF.
- 1.14 Paragraph 158 of the NPPF also emphasises the alignment of the housing and economic evidence base and policy. Paragraph 17 in the NPPF reaffirms this, and outlines that planning should also take account of market signals, such as land prices and housing affordability.
- 1.15 In regard to housing mix, the NPPF sets out that local authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Planning authorities should identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand. Where a need for affordable housing is identified, authorities should set policies for meeting this need on site.
- 1.16 The NPPF states that to ensure a Local Plan is deliverable, the sites and the scale of development identified in the plan should not be subject to a scale of obligations and policy burdens such that their ability to be developed is threatened and should support development throughout the economic cycle. The costs of requirements likely to be applied to development, including affordable housing requirements, contributions to infrastructure and other policies in the Plan, should not compromise the viability of development schemes. To address this, affordable housing policies would need to be considered alongside other factors including infrastructure contributions – a

³ For example, Hart, Bath and NE Somerset or Coventry

'whole plan' approach to viability. Where possible the NPPF encourages local authorities to work up Community Infrastructure Levy (CIL) charges alongside their local plan.

Planning Practice Guidance

1.17 Planning Practice Guidance (PPG) was issued by Government in March 2014 on 'Assessment of Housing and Economic Development Needs' and is maintained online and updated periodically. The PPG is relevant to this SHMA in that it provides clarity on how key elements of the NPPF should be interpreted, including the approach to deriving an objective assessment of the need for housing. The approach in this report takes account of this Guidance.

1.18 The Guidance defines "need" as referring to 'the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet this need.' It sets out that the assessment of need should be realistic in taking account of the particular nature of that area (for example the nature of the market area), and should be based on future scenarios that could be reasonably expected to occur. It should not take account of supply-side factors or development constraints. Specifically, the Guidance sets out that:

"plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historical under performance, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans."

1.19 The Guidance outlines that estimating future need is not an exact science and that there is no one methodological approach or dataset which will provide a definitive assessment of need. However, the starting point for establishing the need for housing should be the latest household projections published by the Department for Communities and Local Government (CLG).

1.20 At the time of preparation of this report the latest projections are the 2014-based Household Projections which were published in July 2016. The PPG sets out that there may be instances where these official projections require adjustment to take account of factors affecting local demography or household formation rates, in particular where there is evidence that household formation rates are or have been constrained by supply.

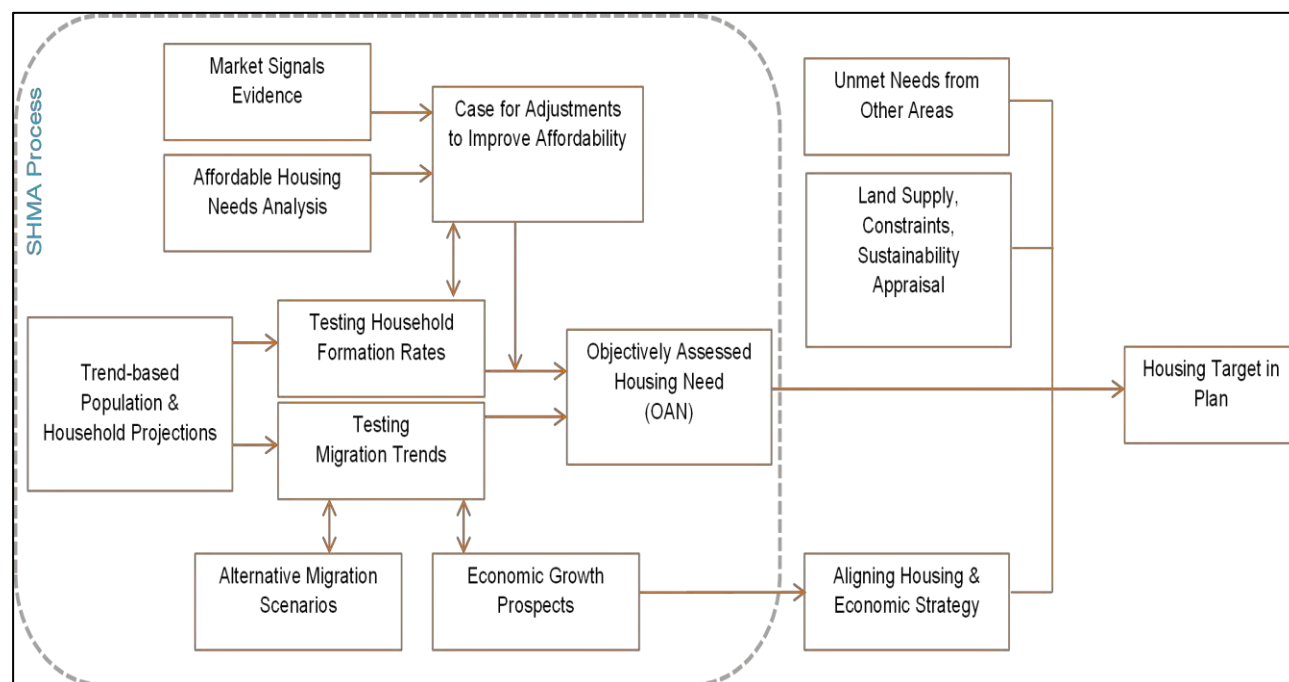
1.21 The PPG sets out that:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other indicators of the balance between the demand for and supply of dwellings...."

"In areas where an upward adjustment [to the assessment of housing need] is required, plan makers should set this adjustment at a level that is reasonable. The more significant the

affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.”

- 1.22 The PPG is clear that market signals are intended to warrant consideration of an adjustment from the starting point demographic projection (ID 2a-019-20140306). The ‘starting point’ demographic projection for this work are the 2014-based Household Projection.
- 1.23 The PPG does not indicate how the scope of an adjustment for market signals should be quantified. It simply sets out that it should be ‘reasonable.’ Various local plan examinations have taken a range of different views, even when faced with similar evidence.
- 1.24 The Guidance also that affordable housing need should be calculated and considered in the context of its likely delivery as a proportion of mixed market and affordable housing. It indicates that this may provide a case for increasing the level of overall housing provision – in order to increase the delivery of affordable housing.
- 1.25 The Guidance indicates that job growth trends and/or economic forecasts should be considered having regard to the growth in working-age population in the housing market area. It sets out that where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility and other sustainable options such as walking and cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing and infrastructure development could help to address these problems. Increasing housing provision could be one such approach.
- 1.26 The factors which are relevant to assessing overall housing need and considering or reviewing housing targets are summarised visually in Figure 1 below.

Figure 1: Overview of PPG Approach to Assessing Housing Need

1.27 The Guidance indicates that a SHMA should also consider the need for different types of housing and the needs of different groups, including family housing, housing for older people, and households with specific needs and those looking to build their own home. It sets out that the need for older persons housing should be broken down by tenure and type, and should include an assessment of need for residential institutions.

Local Planning Policy Review

1.28 The Central Lancashire Core Strategy was prepared jointly by Preston City Council, Chorley Council and South Ribble Council and adopted in July 2012. It is an important document with the purpose of helping to co-ordinate development in the area covered by these three councils.

1.29 The most relevant policy is “CS Policy 4 *Housing Delivery*” sets out the minimum housing delivery requirements for each local authority. In particular the policy states that the councils should:

“a) Provide for and manage the delivery of new housing by setting and applying minimum requirements as follows:

- *Preston 507 dwellings pa*
- *South Ribble 417 dwellings pa*
- *Chorley 417 dwellings pa*

with prior under-provision of 702 dwellings also being made up over the remainder of the plan period equating to a total of 22,158 dwellings over the 2010-2026 period.

(b) Keep under review housing delivery performance on the basis of rolling 3 year construction levels. If, over the latest 3 year review period, any targets relating to housing completions or the use of brownfield are missed by more than minus 20% , the phasing of uncommitted sites will be adjusted as appropriate to achieve a better match and/or other appropriate management actions taken; provided this would not adversely impact on existing housing or markets within or outside the Plan area.

(c) Ensure there is enough deliverable land suitable for house building capable of providing a continuous forward looking 5 year supply in each district from the start of each annual monitoring period and in locations that are in line with the Policy 1, the brownfield target (of 70% of all new housing) and suitable for developments that will provide the range and mix of house types necessary to meet the requirements of the Plan area.

(d) Ensure that sufficient housing land is identified for the medium term by identifying in Site Allocations Documents a further supply of specific, developable sites for housing and in the longer term by identifying specific developable sites or broad locations for future growth.”

- 1.30 CS Policy 7 *Affordable and Special Needs Housing* sets out the minimum affordable and special housing requirements for Central Lancashire. The policy contains the following requirements:
- Targets for affordable housing are set subject to site and development considerations such as financial viability and contributions to community services.
 - The target to be achieved from market housing schemes is:
 - 30% in urban parts of Preston, South Ribble and Chorley;
 - 35% in rural areas on sites in or adjoining villages that have, or will have, a suitable range of services;
 - 100% on rural exception sites including those in the Green Belt.
 - Site thresholds are 15 dwellings (0.5 ha or part thereof) reducing to 5 dwellings (0.15 ha or part thereof) in rural areas.
 - Off-site provision or financial contributions are acceptable where robustly justified.
- 1.31 In October 2012 the Central Lancashire Affordable Housing SPD was published in order to establish the mix of affordable housing tenures; specific details in the level and types of affordable housing as well as viability considerations.
- 1.32 The Preston Local Plan 2012-16 Site Allocations and Development Management Policies DPD was adopted in July 2015 and, with Core Strategy, constitutes the Development Plan framework that is used in determining planning applications in the Council's administrative area.
- 1.33 In particular, Policy HS1 *Allocation of Housing Sites* lists seventeen housing allocations with an estimated total capacity of 8,637 houses of which 5,800 are expected to be completed in the period 2014-2026. There is capacity within the strategic allocation at North West Preston for the construction of an additional 2,837 dwellings as and when required.
- 1.34 Policy HS4 *Rural Exception Affordable Housing* states that new housing developments adjacent to Barton, Broughton, Goosnargh, Grimsargh, Lea Town and Woodplumpton villages may be permitted in exceptional circumstances where there is identified local need for affordable housing as a result of a comprehensive needs assessment for the local area.

- 1.35 Similarly, Policy HS5 *Rural Workers' Dwellings in the Open Countryside* may be permitted development in open countryside if there is evidence that there is need for workers to live on the development. Policy HS6 *University of Central Lancashire* identifies the appropriate location of student accommodation. Finally, Policy HS7 *Houses in Multiple Occupation* provides details with regards to the conversion of single dwellings to MOA.
- 1.36 The Chorley Local Plan 2012-26 Site Allocations and Development Management Policies DPD was adopted in July 2015. Policy HS1 *Housing Site Allocations* lists 52 sites (292 ha) across the Council's administrative area for housing or housing led development. Policy HS8 provides a policy framework supporting the development of rural exception sites. Policy HS10 *Agricultural Worker's Dwellings in Countryside* provides details on permitting dwellings in countryside that support agricultural activity; and finally Policy HS11 *Gypsy and Traveller and Travelling Showpeople* provides the policy framework related to Gypsy and Traveller pitches allocations.
- 1.37 The South Ribble Local Plan 2012-26 was adopted in July 2015. Policy D1 *Allocation of Housing Land* allocates land to support 6,576 houses for the period between 2010 and 2026. Policy D3 *Agricultural Worker's Dwellings in the Countryside* allows the erection of dwellings in countryside that enable agricultural activities.

KEY MESSAGES

- National planning policies require the SHMA to define the 'full objectively assessed need for market and affordable housing.' This provides a starting point for considering or reviewing where appropriate policies for housing provision. The assessment must 'leave aside' constraint factors (including land availability and Green Belt) however these are relevant in drawing together evidence and testing options in the development of local plans. The SHMA does not set targets for housing provision but may inform the review or development of local plans where appropriate.
- Government's Planning Practice Guidance sets out how the objectively assessed need for housing should be defined. It sets out that the starting point should be demographic projections,. The need may then need to be adjusted to support economic growth or improve affordability, taking account of evidence from market signals and of the need for affordable housing. The SHMA follows this approach to identifying housing need. It addresses the requirements of both the NPPF and PPG.

Report Structure

1.38 The remainder of the report is structured in the following way:

- Chapter 2: Defining the Housing Market Area;
- Chapter 3: Characteristics of the housing market;
- Chapter 4: Demographic projections;
- Chapter 5: Economic-led housing need
- Chapter 6: Affordable housing need;
- Chapter 7: Market signals
- Chapter 8: Requirements for different types and sizes of homes;
- Chapter 9: Specific groups of the population; and
- Chapter 10: Conclusions and recommendations.

2 DEFINING THE HOUSING MARKET AREA

2.1 The purpose of this section is to assess what the relevant Housing Market Area (HMA) that the Central Lancashire authorities sit within is. The consultancy team has approached this issue with an open mind.

Guidance on assessing housing market geographies

2.2 The National Planning Policy Framework (NPPF) states that in planning for housing provision, local authorities should work together at a 'housing market area' level. The starting point in planning for housing is that objectively assessed needs for the housing market area should be met within the related HMAs, as set out in Paragraph 47 in the Framework.

2.3 Based on Planning Practice Guidance (PPG) housing market areas are geographical areas defined by household demand and preferences for housing. The PPG identifies three primary sources of information which can be used to define these:

- House prices and rates of change in house prices, which reflect household demand and preferences for different sizes and types of housing in different locations;
- Household migration and search patterns, reflecting preferences and the trade-offs made when choosing housing with different characteristics; and
- Contextual data, such as travel to work areas, which reflects the functional relationships between places where people work and live.

2.4 No retail and school catchment data has been reviewed when defining Housing Market Areas because in our experience these tend to be relatively localised, and whilst they may inform the definition of sub-markets, they are less likely to be of use in considering sub-regional housing market geographies.

2.5 The Guidance makes it clear that these sources of information (as identified in the bullet points above) can reflect different aspects of household behavior and that there is therefore no 'right or wrong' set to use in identifying housing markets; the focus is on considering what is appropriate in a local context.

2.6 The PPG largely reiterates previous guidance on defining HMAs set out within the CLG's 2007 Advice Note⁴ on *Identifying Sub-Regional Housing Market Areas*. There has been effectively no change in guidance, which continues to emphasise that there is no right or wrong answer as to how an HMA should be defined; and confirms that the approach should, in effect, reflect local market characteristics and circumstances.

⁴ DCLG (March 2007) *Identifying Sub-Regional Housing Market Area: Advice Note*

- 2.7 There is a range of previous work which has been undertaken to define HMAs over the last decade, at national, regional and local levels. It is now however appropriate to review this, not least given that a significant proportion of the past work is informed by 2001 Census data regarding commuting and migration patterns. 2011 Census flow data was issued between July 2014 and December 2014.
- 2.8 A further practical issue regards the geographical building blocks that housing market areas are comprised of. A key purpose of the SHMA is to define the Objectively Assessed Need (OAN) for housing. Paragraphs 15-17 of the PPG relate to *Strategic Housing Market Assessments* and states clearly that the starting point for undertaking such a study are the latest official population and household projections. The official population and household projections are not published below local authority level, nor is the data regarding migration or household formation rates which are key drivers within the projections. This prohibits robust developed of population projections for areas below local authority level. On this basis we consider that HMAs should be defined based on the 'best fit' to local authority boundaries; albeit those assessments can (and should) recognise cross-boundary influences and interactions. Paragraph 5.21 of the PAS Technical Advice Note⁵ supports this, concluding that:

"it is best if HMAs, as defined for the purpose of needs assessments, do not straddle local authority boundaries. For areas smaller than local authorities, data availability is poor and analysis becomes impossibly complex."

- 2.9 This approach is widely accepted and is a practical and pragmatic response to data availability. In practice we recognise that towards the edge of most housing market areas there are likely to be influences in at least two directions reflecting a degree of overlap between HMAs.

National Research on Defining Housing Market Areas

- 2.10 There are also some further practical issues in identifying HMAs which are dealt with in the Planning Advisory Service (PAS) Technical Advice Note on Objectively Assessed Need and Housing Targets⁶. This Advice Note, written by Peter Brett Associates (PBA), outlines that in practice, the main indicators used to define HMAs are migration and commuting flows. In Paragraphs 5.5 and 5.6, the report sets out that:

"One problem in drawing boundaries is that any individual authority is usually most tightly linked to adjacent authorities and other physically close neighbours. But each of these close neighbours in turn is most tightly linked to its own closest neighbours, and the chain continues indefinitely."

⁵ Objectively Assessed Need and Housing Targets: Technical Advice Note, Prepared for the Planning Advisory Service by Peter Brett Associates (July 2015)

⁶ Objectively Assessed Need and Housing Targets: Technical Advice Note, Prepared for the Planning Advisory Service by Peter Brett Associates (July 2015)

Therefore, if individual authorities worked independently to define HMAs, almost each authority would likely draw a different map, centred on its own area.”

- 2.11 Paragraph 5.6 of the PAS Advice Note argues that to address this issue, it is useful to start with a “top down analysis” which looks at the whole country. One such analysis is provided by a research study led by the Centre for Urban and Regional Development Studies (CURDS) at Newcastle University. The CURDS study sought to define a consistent set of HMAs across England principally based on the 2001 census. The report was published by the Government in November 2010⁷.
- 2.12 In Paragraph 5.10 PBA emphasise that the CURDS work should be considered only as a ‘starting point’ and should be ‘sense-checked’ against local knowledge and more recent data, especially on migration and commuting. The Advice Note concludes that more recent data ‘should always trump’ the national research.
- 2.13 Our approach in Central Lancashire is structured to firstly consider the CURDS geographies, then other recent work which has considered housing market geographies in the region, and finally to review and consider the most appropriate HMA boundaries through analysis of key indicators set out in the PPG.

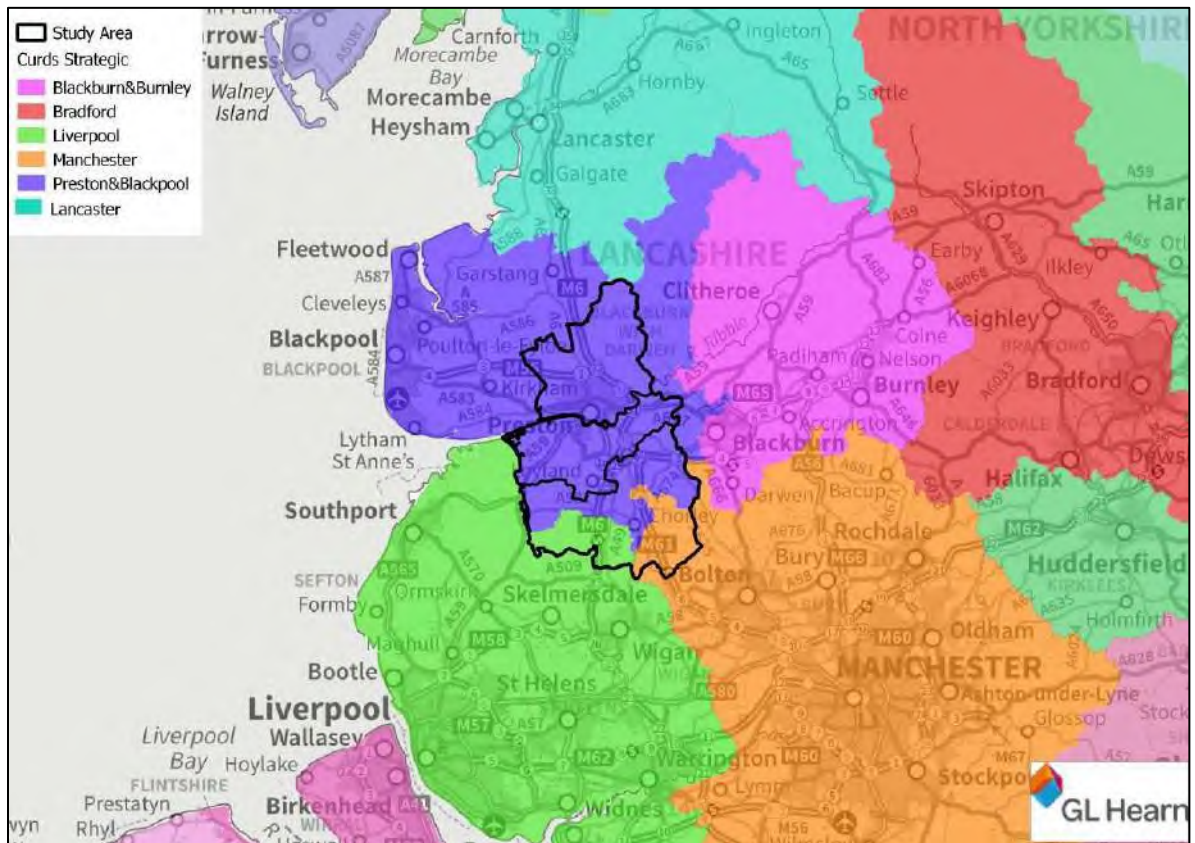
The CURDS Study Findings

- 2.14 The 2010 CURDS Study, for Central Government, sought to identify the geographies of housing markets across England. This academic-driven project considered commuting and migration dynamics and house prices standardised for differences in housing mix and neighbourhood characteristics. This information was brought together to define the following three tiered structure of housing markets:
- Strategic (Framework) Housing Market Areas – based on 77.5% commuting self-containment (shown in Figure 4 below);
 - Local Housing Market Areas – which are sub divisions of the framework HMAs in urban areas are based on 50% migration self-containment (Figure 5); and
 - Sub-Markets – which would be defined based on neighbourhood factors and house types.
- 2.15 The CURDS Strategic and Local HMAs are mapped across England, with the Local HMAs embedded within the wider Strategic HMAs. Both are defined based on wards at a “gold standard” and based on local authorities for the “silver standard” geography.
- 2.16 The study area sits across three Strategic Housing Market Areas as defined by the CURDS Study, but the vast majority of Central Lancashire sits within the Preston and Blackpool Strategic HMA. The south west part of Chorley Council (including Coppull and Eccleston) is shown within the

⁷ Jones, C. Coombes, M. and Wong, C. (2010) *Geography of Housing Market Areas in England: Summary Report*

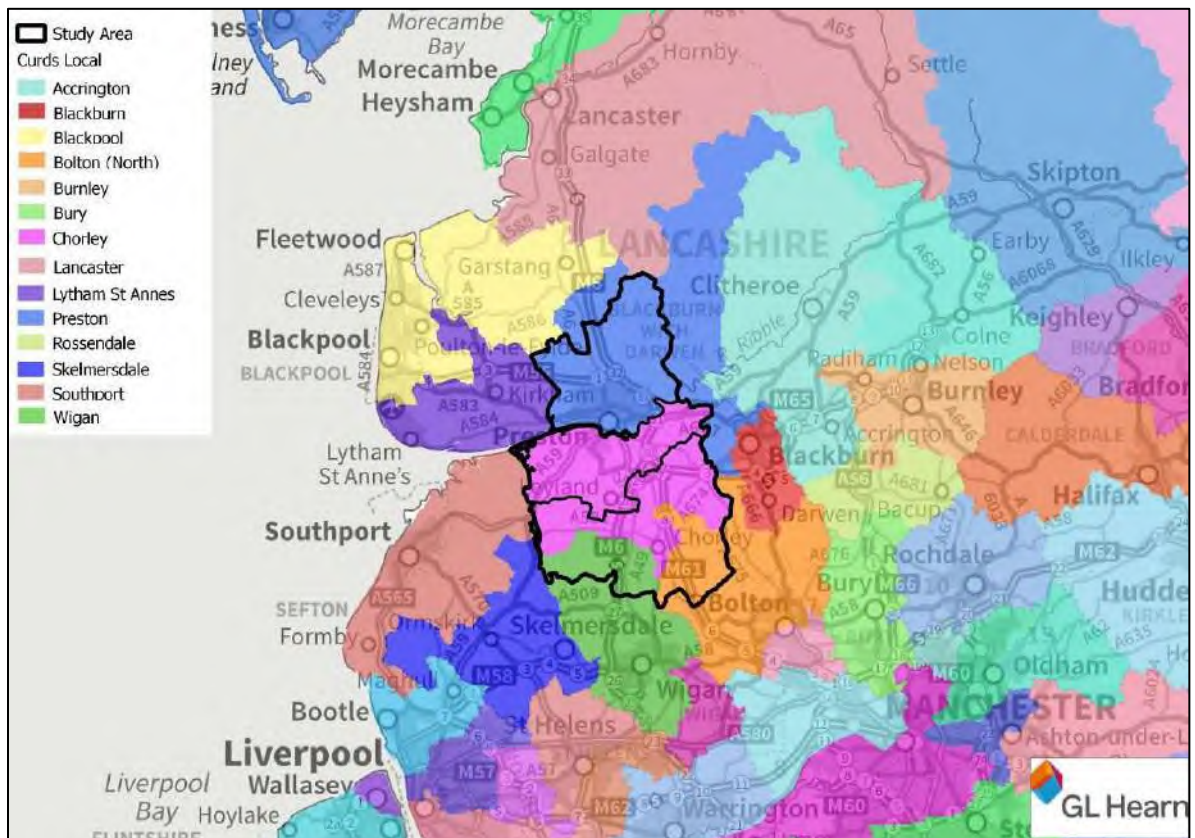
Liverpool HMA while the south east (including Adlington and Rivington) is within the Manchester HMA (See Figure 2).

Figure 2: CURDS-defined Strategic Housing Market Areas



Source: CURDS and GL Hearn, 2010

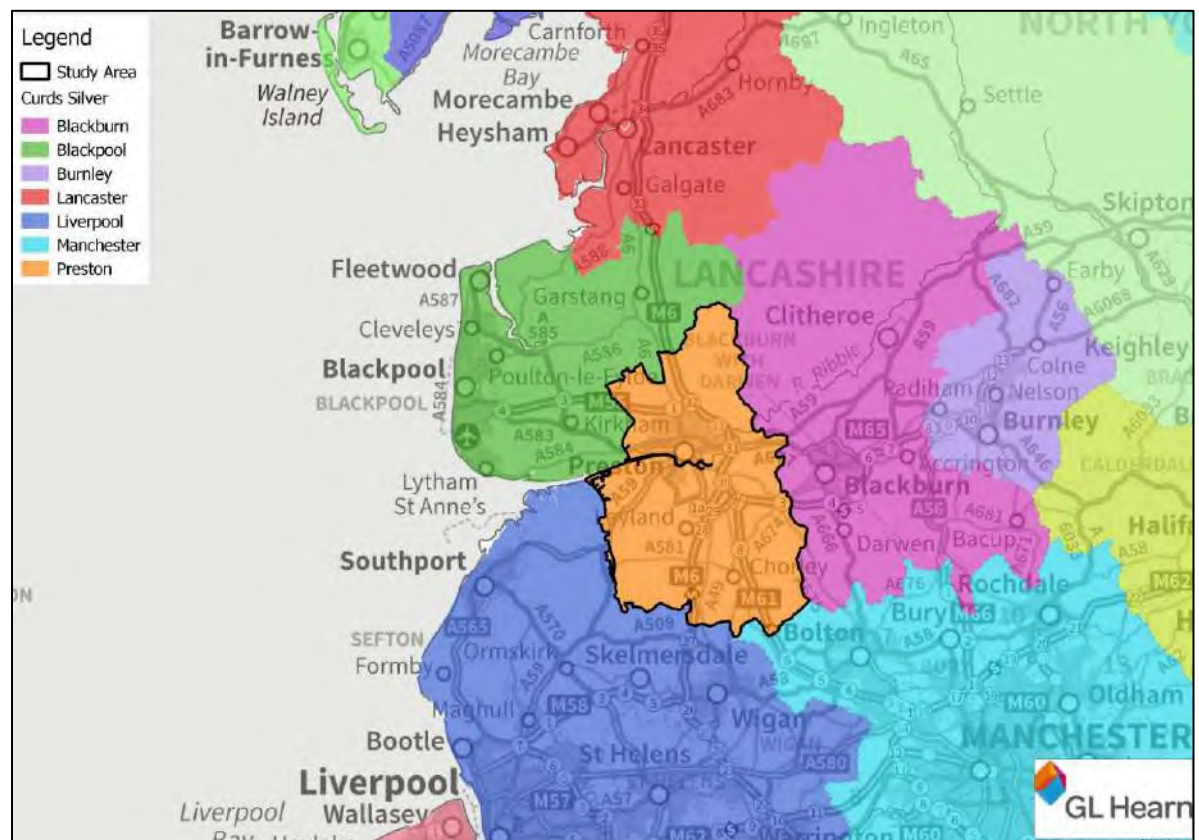
- 2.17 The CURDS Study also defined Local Housing Market Areas (LHMAs) which are embedded within the Strategic HMAs, based on areas with 50% self-containment of migration flows (using 2001 Census data). The study area includes parts of four LHMAs (see Figure 3). In particular Chorley LHMA sits entirely within the study area. The Preston LHMA covers all of Preston City and extends northwards into Wyre and eastwards into Ribble Valley and Blackburn with Darwen. Those parts of Chorley Council area which are defined within the Liverpool and Manchester Strategic Housing Market Areas fall within Wigan and Bolton local HMAs respectively.

Figure 3: CURDS-defined Local Housing Market Areas

Source: CURDS and GL Hearn, 2010

- 2.18 Figures 2 and 3 illustrate the CURDS gold-standard work which defined HMAs by grouping wards together. However, as population and household projections are only published at a local authority basis, it is an accepted standard practice to group local authorities as the “best fit” to an HMA and this is encouraged within the PAS Technical Advice Note.
- 2.19 Figure 4 shows the "Single Tier Silver Standard" geography defined by CURDS. This shows that there is a single HMA across the study area called Preston HMA, which includes the local authorities of Preston, South Ribble and Chorley. In Paragraph 5.9 of the PAS Technical Advice Note, Peter Brett Associates state that:

“We prefer the single-tier level because strategic HMAs are often too large to be manageable; we prefer the ‘silver standard’ because HMAs boundaries that straddle local authority areas are usually impractical, given that planning policy is mostly made at the local authority level, and many kinds of data are unavailable for smaller areas. But for some areas, including many close to London, the single-tier silver standard geography looks unconvincing; in that plan-makers should look for guidance to other levels in the NHPAU analysis.”

Figure 4: CURDS-defined Silver Standard Housing Market Areas

Source: CURDS and GL Hearn, 2010

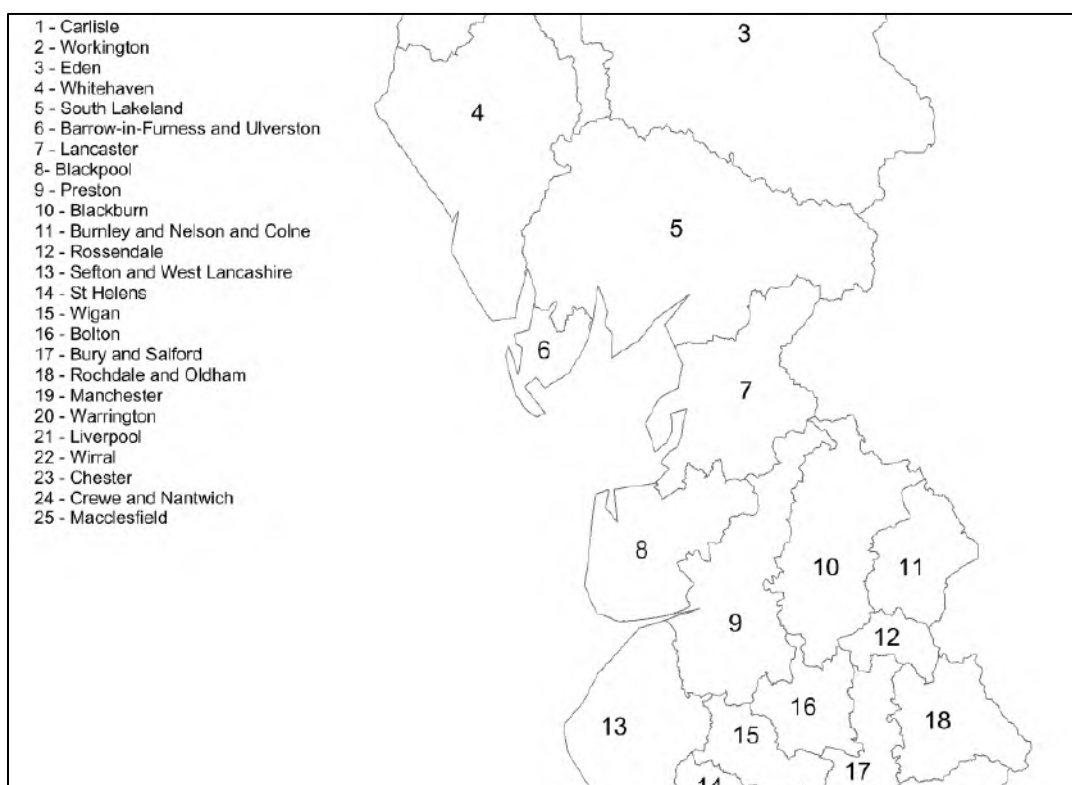
- 2.20 It should be noted that these HMA definitions are based on 2001 Census analysis which is somewhat dated, although for some areas the dynamics will not have changed substantially. In addition this research is based on national-level data analysis which whilst providing a useful basis for starting to look at housing market areas is undertaken at a high level. Thus this report tests and considers further definitions of housing market areas based on wider research and more recent evidence.

Regional Research on Housing Market Areas

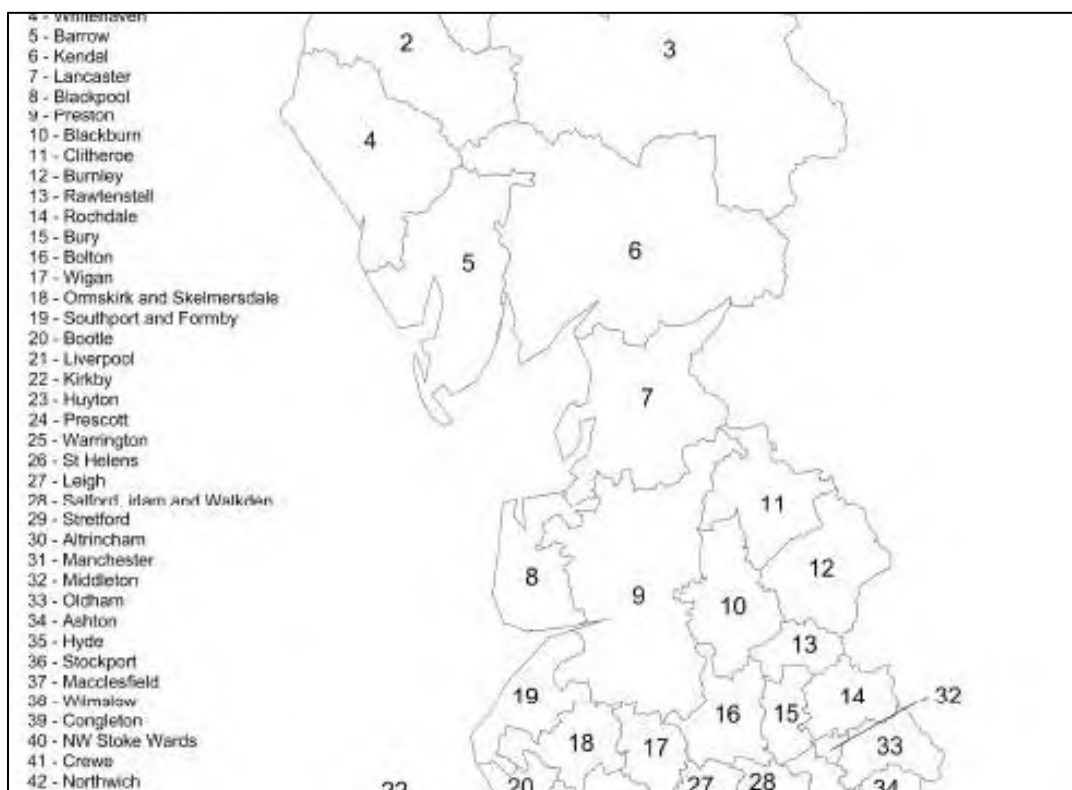
- 2.21 At a regional level there have been three important HMA definition exercises in the North West region. The Government Office for the North West commissioned ECOTEC in 2006 to define HMAs for the region in order to inform housing allocations. In 2008, the North West Development Agency with the help of academics, defined HMAs as part of a Study to understand spatial interactions between housing and labour markets in the region. In the same year the North West Regional Assembly commissioned Nevin Leather Associates and academic partners to define HMAs that could be used to undertake housing market assessments.

- 2.22 In 2012, Dr Hincks and Dr Baker (of the University of Manchester) published a study⁸ that reviewed all the above HMA definitions. Their findings conclude that *“the definition of HMAs should be embedded within a conceptual framework that incorporates the principles of spatial arbitrage, markets search, the relationship between home and work, and considers the issue of scale.”* The review also explores how the HMA definitions are operationalised from a technical and methodological perspective in the North West. They conclude that *“It was apparent from the review that use had been made of a range of secondary data collected by official organisations and agencies. All of these datasets had advantages in defining the HMAs in the respective studies. However, it was also argued that all of the approaches were constrained in one form or another by technical restrictions. Questions were also raised over the replicability and transparency of the approaches given the degree of interpretation that as built into the three approaches”.*
- 2.23 The study area (Preston, South Ribble and Chorley local authorities) was identified in the Nevin Leather Associates et al study as entirely within Central Lancashire HMA which is identical to the CURDS Silver Standard HMA (Figure 4 above). In Brown and Hincks’ report, as well as in ECOTEC’ HMA definition, the study area sits entirely within the Preston HMA (no 9 in Figure 5 and 6).

Figure 5: Brown and Hincks HMA Definition-2008 (Source: Baker & Hincks, 2012)

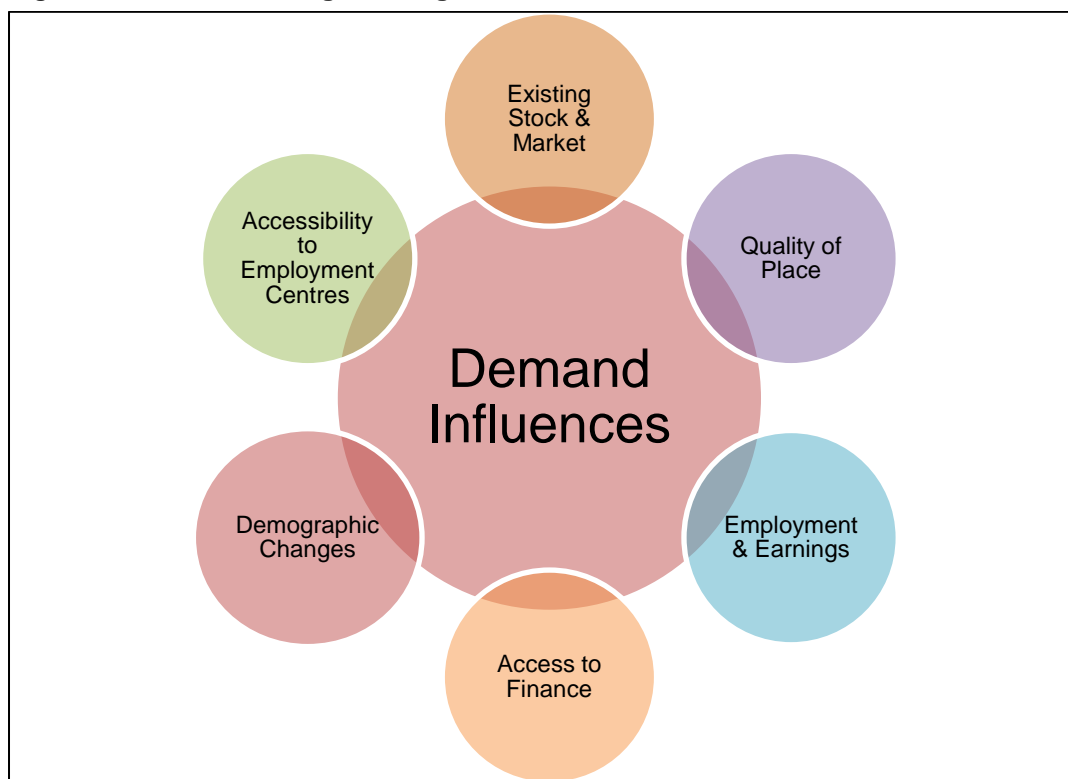


⁸ Hincks & Baker (2012) A Critical Reflection on Housing Market Area Definition in England, Housing Studies, Vol 12 Issue 7, p 873-897

Figure 6: ECOTEC HMA definitions-2006 (Source: Baker & Hincks, 2012)

Updating the HMA Definitions

- 2.24 This section of the report reviews HMA geographies by taking account of the latest available data on house prices, migration and commuting flows. These are the key indicators identified in paragraph 2a-011 of the PPG. It considers, using the latest evidence, whether the HMA definitions defined previously hold true.
- 2.25 Paragraph 11 of the PPG (ID: 2a-011-20140306) relating to housing and economic development needs assessments states that house prices can be used to provide a 'market based' definition of HMA boundaries, based on considering areas which (as the PPG describes) have clearly different price levels compared to surrounding areas.
- 2.26 It is important to understand that the housing market is influenced by macro-economic factors, as well as the housing market conditions at a regional and local level. There are a number of key influences on housing demand, which are set out in Figure 7 below:

Figure 7: Understanding Housing Demand Drivers

Source: GL Hearn

- 2.27 At the macro-level, the market is particularly influenced by interest rates and mortgage availability, as well as market sentiment (which is influenced by economic performance and prospects at the macro-level). The market is also influenced by the economy at both regional and local levels, recognising that economic employment trends will influence migration patterns (as people move to and from areas to access jobs) and that the nature of employment growth and labour demand will influence changes in earnings and wealth (which influences affordability).
- 2.28 Housing demand over the longer-term is particularly influenced by population and economic trends: changes in the size and structure of the population directly influence housing need and demand, and the nature of demand for different housing products.
- 2.29 There are then a number of factors which play out at a more local level, within a functional housing market and influence demand in different locations. Local factors include:
- quality of place and neighbourhood character;
 - school performance and the catchments of good schools;
 - accessibility of areas including to employment centres (with transport links being an important component of this); and
 - existing housing market conditions.

- 2.30 These factors influence the demand profile and pricing within the market. At a local level, this often means that the housing market (in terms of the profile of buyers) tends to be influenced by and to some degree reinforces the existing stock profile.
- 2.31 Local housing markets or sub-markets are also influenced by dynamics in surrounding areas, in regard to the relative balance between supply and demand in different markets and the relative pricing of housing within them. Understanding relative pricing and price trends is thus important.
- 2.32 The important thing to recognise here is that we are likely to see localised variations in housing costs which reflect differences in the housing offer, quality of place and accessibility of different areas *within* a functional housing market area. We would also expect urban areas to have lower house prices than neighbouring suburban or rural areas. This reflects differences in the size/m² of properties being sold and the influence of quality of place on housing costs. Some settlements, or parts of an area, are likely to command higher prices than others reflecting these factors; and indeed we would expect areas with varying house prices within any HMA reflecting these issues. These factors are most relevant in considering housing sub-markets (the third tier of markets using the CURDS definition).
- 2.33 What this section is focused upon is considering market geographies at a higher spatial level. Consideration of price differentials at a sub-region level is therefore of most relevance.

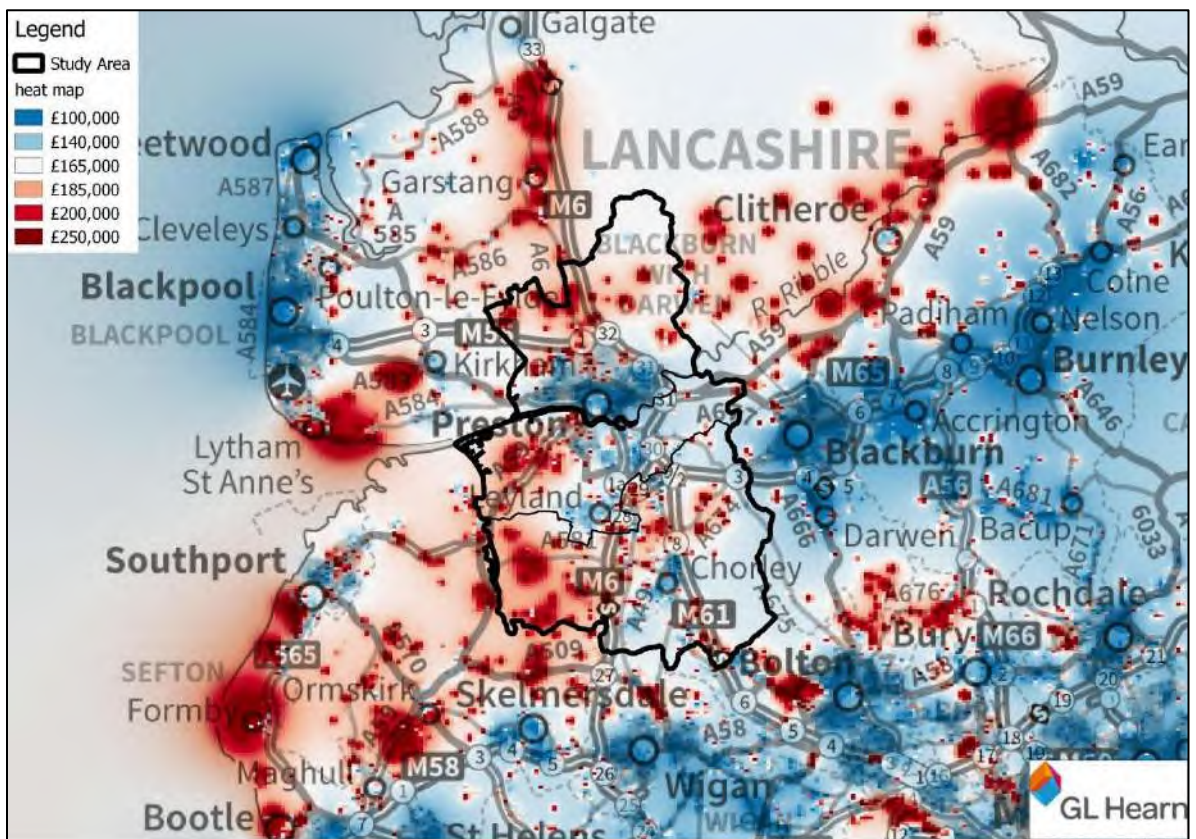
House Prices

- 2.34 With the exception of central London, the general geography of house prices is of higher housing costs in rural areas with lower housing costs within the principal urban areas. This largely reflects the mix of housing within these respective areas although other considerations such as the quality of place and accessibility also influence.
- 2.35 Using Land Registry data for 2015 it is possible to map house prices across Central Lancashire and the wider North West. This illustrates that in relative terms, average house prices for property are lowest in Preston City, the towns of Chorley and Leyland; and highest in the attractive smaller settlements such as Croston and Mawdesley in Chorley Council (CC) administrative area, Longton in South Ribble (SR) and Barton in Preston City (PC).

2.36 Figure 8 is a heat map of the prices paid in 2015. The following broad price zones⁹ can be identified:

- Prices under £140,000 in Preston City and town of Chorley;
- Prices between £140,000 and £165,000 in town of Leyland (SR), Bamber Bridge (SR) and Lostock Hall (SR);
- Prices between £165,000 and £185,000 in Penwortham (SR), Fulwood (PC) and Buckshaw Village (CC);
- Prices between £185,000 and £200,000 in Broughton (PC), Fulwood (PC), Whittle-le-woods (CC) and Penwortham (SR);
- Prices above £200,000 in Croston (CC), Mawdesley (CC), Longton (SR), Barton (PC) and Higher Wheelton (CC).

Figure 8: House Price paid in 2015 Heat Map



Source: GL Hearn Analysis: Land Registry, 2016

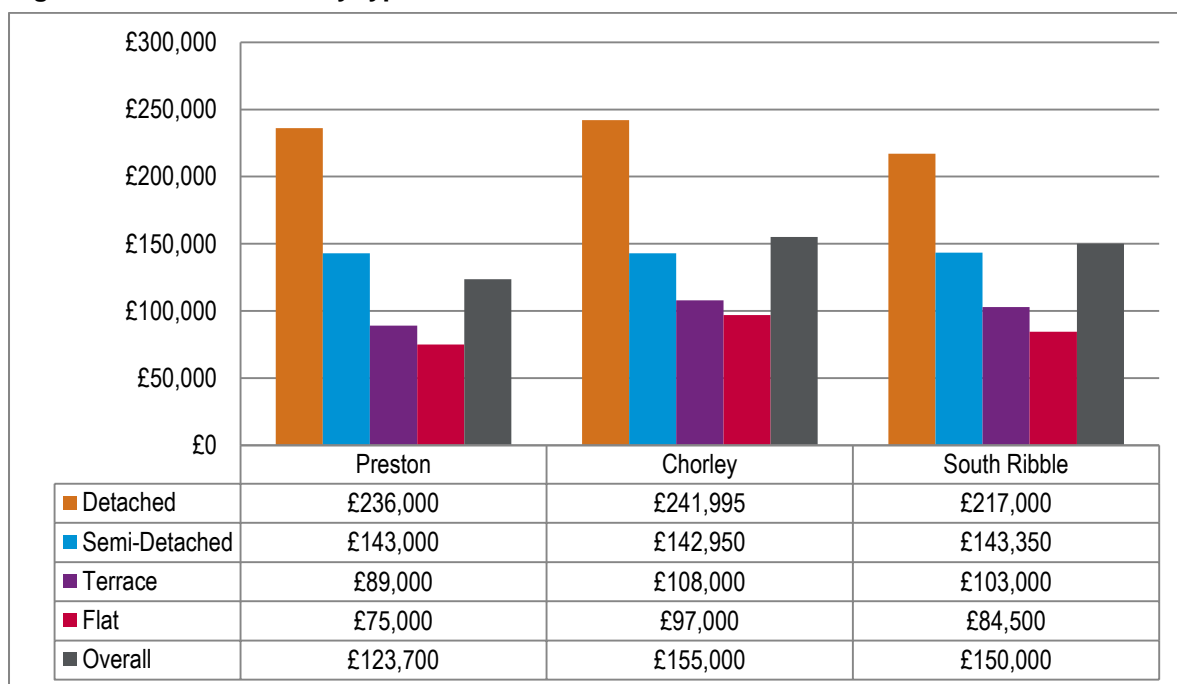
House Price by Type

2.37 Typically, we would expect higher house prices in those areas which have a high percentage of detached properties (rural areas) and lower values in areas where there is a high percentage of smaller flatted stock (urban areas).

⁹ Based on data from Land Registry 2015 Complete Year.

2.38 In order to corroborate this, the house prices across the range of typologies have been analysed and presented below. To draw firmer conclusions on HMA areas, grouping where appropriate administrative areas, the analysis shifts away from more localised data to data based on local authority levels. Figure 9 sets out median house price by type for each local authority in Central Lancashire.

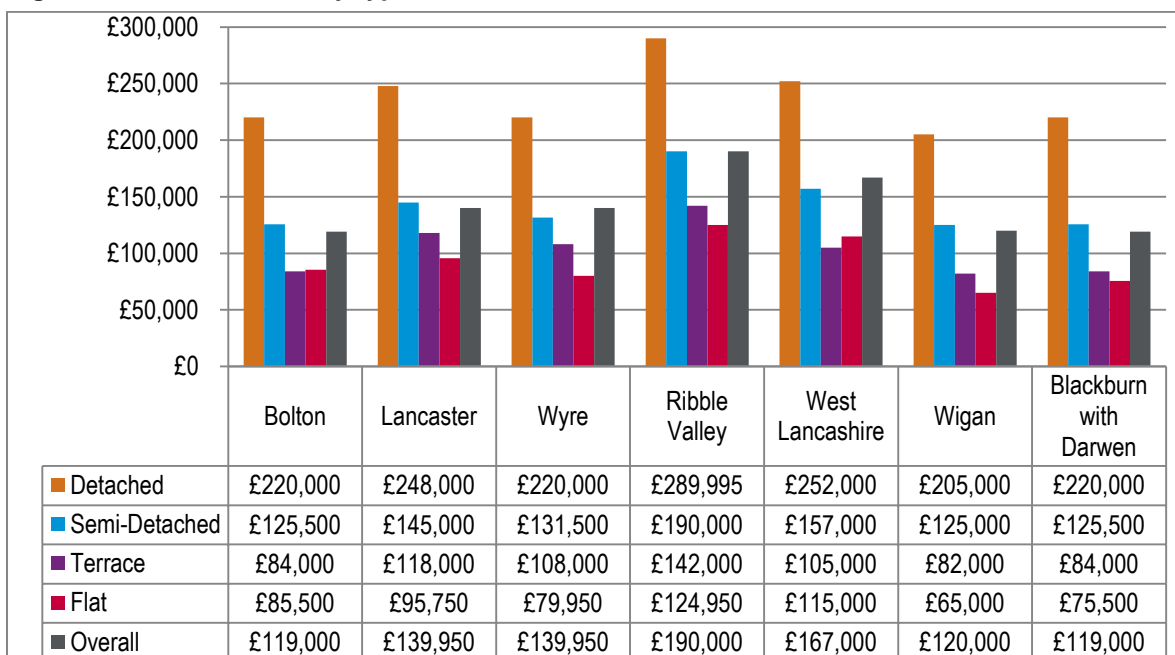
Figure 9: Median Price by type of residence 2015



Source: CLG (2015)

2.39 Chorley has the highest overall median price in the study area (£155,000), followed closely by South Ribble (£150,000). Preston's overall median house price is £123,700 which is lower than the rest of the study area. This is expected considering that Preston has the highest concentration of flats as the urban core of the study area and is the largest urban area. In general, house prices in the Central Lancashire authorities are quite similar. In particular, Semi-detached prices are almost identical while the other typologies only have relatively small differences.

2.40 Figure 10 presents the median house price by type for the surrounding authorities. The overall house price in Ribble Valley is the highest in the wider area reaching £190,000, followed by West Lancashire with an equivalent of £167,000. Lancaster and Wyre's overall median house price is £139,950. All the rest fall below £120,000. Preston's overall housing price is similar to Wigan however the prices by type differ and Preston's housing stock is more expensive.

Figure 10: Median Price by type of residence 2015 for the wider area

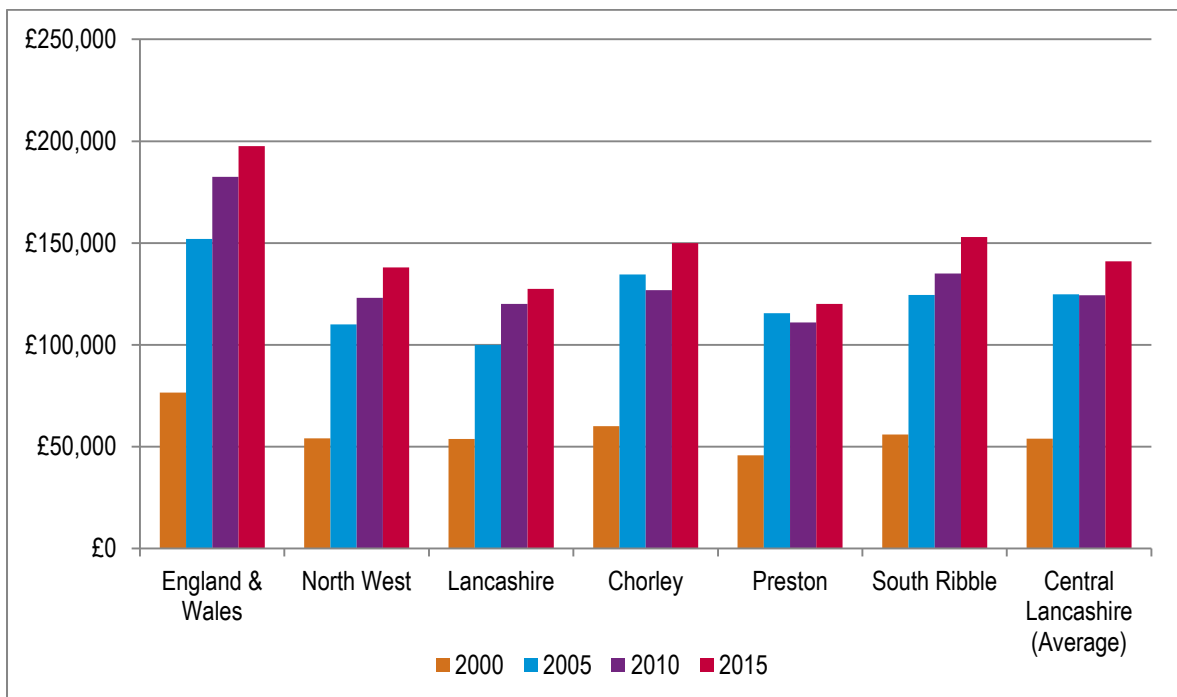
Source: CLG (2015)

- 2.41 This analysis suggests that the Central Lancashire authorities have relatively similar house prices. This suggests that the area could be considered as a housing market area in its own right by this measure.

House Price Change

- 2.42 We next consider changes in housing costs. Figure 11 assesses trends in the median house prices for the study area between 2000 and 2015, and Table 1 present changes for the wider area. Central Lancashire house prices have consistently been above the wider Lancashire and North West averages since 2000. Over the last ten and fifteen years South Ribble's median house prices increased the most (23% and 173%). However, the last five years Chorley's house prices have increased by 18%, almost 5% more than in South Ribble. Preston's median house price has increased marginally since 2005 (4%); while over the last five years there was a change of 8% indicating that prices fell between 2005-10.

Figure 11: Median Price (Q1) 2000-2015



Source: CLG (2015)

2.43 Table 1 presents house price change analysis looking over 5, 10 and 15 year periods to 2015. The table includes information of the wider area, including other local authorities in Lancashire, the metropolitan counties of Greater Manchester and Merseyside and the Unitary Authorities of Blackburn with Darwen, Halton and Warrington.

2.44 Over the last ten years median house prices in the study area increased by 13%. South Ribble had the highest increase (23%) however that was still lower than the national comparator (30%) and around the midpoint of all the areas considered. Over the same period, Preston City had a modest increase of 4%; which was the lowest growth of all the comparators presented in the table. Chorley and South Ribble saw the strongest relative growth between 2010-15.

Table 1: Median House Price changes since 2000

	5 year period 2010-15	10 year period 2005-2015	15 year period 2000-2015
Chorley	18%	11%	150%
Preston	8%	4%	162%
South Ribble	13%	23%	173%
Central Lancashire	13%	13%	161%
Burnley	13%	100%	135%
Fylde	-1%	11%	166%
Hyndburn	6%	31%	150%
Lancaster	8%	23%	157%
Pendle	15%	60%	132%
Ribble Valley	26%	16%	182%
Rosendale	11%	30%	166%
West Lancashire	-4%	13%	138%
Wyre	8%	10%	145%
Lancashire	6%	28%	137%
North West	12%	25%	156%
England & Wales	8%	30%	158%
Greater Manchester	14.9%	28.6%	170.1%
Merseyside	4.2%	17.9%	145.1%
Blackburn with Darwen	7.7%	29.2%	142.3%
Halton UA	5.0%	19.0%	135.8%
Warrington UA	11.6%	17.8%	156.4%

Source: CLG (2015)

Migration Patterns

- 2.45 Migration flows reflect the movement of people between homes. They are thus an important factor in considering the definition of an HMA.
- 2.46 Migration data from the 2011 Census is only published at a local authority level. The Census records migration, asking people where they lived one year prior to Census day and on the Census day itself. The use of Census data is preferable to other data (such as from the NHS Central Health Register) as it records movement within individual local authorities, as well as between them, allowing self-containment levels to be assessed.

Self-Containment within Individual Local Authorities

2.47 The core analysis relating to migration is the self-containment rate. Paragraph 11 of the PPG sets out that when defining HMAs:

“Migration flows and housing search patterns reflect preferences and the trade-offs made when choosing housing with different characteristics. Analysis of migration flow patterns can help to identify these relationships and the extent to which people move house within an area. The findings can identify the areas within which a relatively high proportion of household moves (typically 70 per cent) are contained. This excludes long distance moves (e.g. those due to a change of lifestyle or retirement), reflecting the fact that most people move relatively short distances due to connections to families, friends, jobs, and schools.”

2.48 Table 2 shows self-containment levels within the individual authorities as well as the study area as a whole, initially including long-distance moves. These can be measured either in terms of those who moved out of or those who moved in to each local authority and the study area during 2010-2011.

2.49 The self-containment rate of the study area including long distances is 70-72%. This reveals that the study area has a high level of self-containment even with the long distance migration included in the figures. As expected the self-containment for each authority is lower, ranging from 52-63% with Preston presenting the highest rate. Migration self-containment levels for individual authorities are not sufficient for them to be considered to represent a housing market area in their own right.

Table 2: Self-containment of Migration flows within Individual Authorities 2010-11

Local Authority	% Self-containment of out to flows	% Self-containment of in from flows
Preston	63%	60%
Chorley	56%	53%
South Ribble	52%	56%
Central Lancashire	72%	70%

Source: GL Hearn Analysis of Census 2011

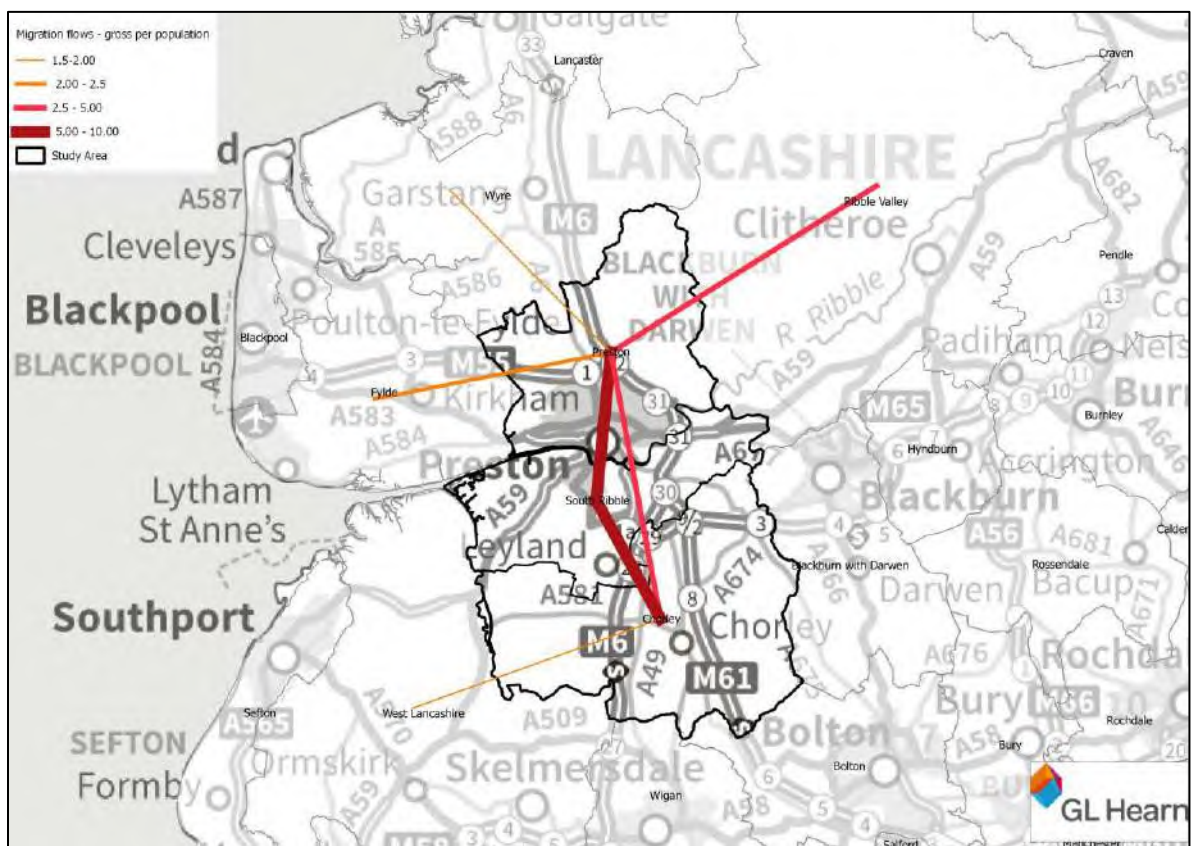
Migration flows between local authorities

2.50 In absolute terms, the largest gross migration flows for each local authority in the study area involve the other two commissioning authorities, illustrating strong inter-relationships between the three authorities of Chorley, South Ribble and Preston. The major flows to areas outside of Central Lancashire are principally to the adjacent authorities. In particular Preston has links with Fylde and Ribble Valley, although these are much weaker than those with the Chorley and South Ribble.

2.51 Typically, this data source reveals larger flows between authorities which are close to or border one another; and between cities and student towns around the country. The scale of flows is partly influenced by the population of the authorities involved, with for instance the expectation that two

large urban authorities would support stronger flows than two smaller ones. Taking this into account, Table 3 and Figure 12 standardise the analysis of gross flows to take account of the combined population of the different authorities expressed per combined 1,000 head of population. In other words it illustrates the inter-relationships between the study area authorities and their surroundings, weighted to reflect the size of the combined population. The analysis suggests that all the local authorities present their strongest inter-relationships with the other local authorities in the study area. Migration relationships with other local authorities are notably weaker.

Figure 12: Gross weighted migration flows (>1.5)



Source: Census 2011, GL Hearn Analysis

2.52 Preston City Council and South Ribble Borough Council have their strongest gross weighted flows with each other, followed by the flows with Chorley Borough Council, while the latter has its strongest weighted gross flows with South Ribble as presented below (Table 3).

Table 3: Top Gross flows Per '000 population

	Preston	South Ribble	Chorley	Lancaster	Ribble Valley	Wyre	Fylde	Blackpool	West Lancashire	Wigan	Bolton	Blackburn with Darwen
Preston	-	7.59	2.76	1.12	1.14	1.83	1.15	1.37	1.30	1.21	0.66	1.25
South Ribble	7.59	-	8.58	0.78	0.77	0.44	1.12	0.43	0.78	0.39	0.27	0.80
Chorley	2.76	8.58	-	0.87	0.68	0.34	0.94	0.52	1.54	1.16	1.35	1.12
Lancaster	1.12	0.78	0.87	-	0.76	1.85	1.15	0.90	0.37	0.55	0.50	0.57
Ribble Valley	1.14	0.77	0.68	0.76	-	0.72	0.60	0.27	0.14	0.07	0.16	2.78
Wyre	1.83	0.44	0.34	1.85	0.72	-	3.16	9.20	0.28	0.14	0.22	0.19
Fylde	1.15	1.12	0.94	1.15	0.60	3.16	-	7.35	0.26	0.17	0.20	0.43
Blackpool	1.37	0.43	0.52	0.90	0.27	9.20	7.35	-	0.25	0.23	0.23	0.40
West Lancashire	1.30	0.78	1.54	0.37	0.14	0.28	0.26	0.25	-	2.08	0.32	0.28
Wigan	1.21	0.39	1.16	0.55	0.07	0.14	0.17	0.23	2.08	-	2.77	0.21
Bolton	0.66	0.27	1.35	0.50	0.16	0.22	0.20	0.23	0.32	2.77	-	1.17
Blackburn with Darwen	1.25	0.80	1.12	0.57	2.78	0.19	0.43	0.40	0.28	0.21	1.17	-

**The green boxes highlight the top gross flow from each authority*

Source: Census 2011, GL Hearn Analysis

Self-Containment (excluding Long-Distance Flows)

- 2.53 By re-calculating the self-containment rate with long distance moves excluded, the analysis below allows plan makers to have a better understanding of the migration flows in the local area removing lifestyle moves and those associated with moving to study or for work. For this purpose, long distance flows are those coming from outside a 50km radius from the study area. In total there are 28 local authorities which fall into the “short distance” moves category.
- 2.54 Table 4 shows the updated self-containment excluded long distance moves. The self-containment for the three Central Lancashire authorities is 82-83%, and at a local authority level between 62% in South Ribble to 73% in Preston. It is typical for larger urban centres to have higher self-containment, in part related to their size and economic strength; but there are often close inter-relationships with adjoining areas.

Table 4: Self-containment of Short Distance flows 2010-11

Local Authority	% Self-containment of out to flows	% Self-containment of in from flows
Preston	73%	73%
Chorley	66%	60%
South Ribble	59%	62%
Central Lancashire	83%	82%

Source: Census 2011

- 2.55 As illustrated the study area has a significant self-containment rate (over 80%) when long distance moves are excluded. This would suggest that there is ground to justify the definition of a unique HMA across the study area on the basis of migration patterns.

Statistically Significant Migration Flows

- 2.56 The ONS also identify ‘statistically significant’ flows between local authorities. These are based on the scale and range of flows within each local authority between 2011 and 2014. The statistically significant flows to/from individual authorities in the study area and the wider area are presented in Table 5 ordered by the strength of flow.
- 2.57 The findings reveal that all the authorities of the study area have a statistically significant flow from each other. Preston however as an urban and university area presents significant flows with other surrounding authorities and main cities like Manchester and Liverpool. The data presents additional flows with Ribble Valley and Blackburn with Darwen as well as Lancaster, Wigan and Bolton.
- 2.58 Chorley has a notable inward flow from Bolton, and Wigan and Blackburn both see a significant outflow to Chorley. However in absolute figures all these flows are much smaller than the flows between the authorities of Central Lancashire. The analysis does show some linkages in migration

terms with other areas – this however is common, and there are few areas on the mainland UK which are entirely self-contained.

Table 5: Statistically Significant Migration Flows (2011-2014)

Direction	Inward	Outward
Preston	South Ribble , Wyre, Manchester, Chorley , Blackpool, Lancaster, Ribble Valley, Fylde, Blackburn with Darwen, Bolton, Liverpool	South Ribble
South Ribble	Preston, Chorley	Chorley, Preston
Chorley	South Ribble , Bolton, Preston	South Ribble
Fylde	Blackpool	Blackpool, Wyre
West Lancashire	Sefton, Liverpool, Wigan	Sefton, Liverpool, Wigan
Wigan	Bolton, Salford, St Helens, West Lancashire, Manchester	Bolton, Salford, St Helens, West Lancashire, Manchester, Chorley
Bolton	Bolton, Bury, Salford, Manchester	Wigan, Salford, Bury, Manchester, Chorley
Blackburn with Darwen	Hyndburn, Ribble Valley	Hyndburn, Ribble Valley, Bolton, Manchester, Burnley, Chorley , Leeds, Preston
Ribble Valley	Blackburn with Darwen, Hyndburn, Preston , Burnley, Pendle,	Preston , Hyndburn, Blackburn with Darwen, Burnley
Wyre	Blackpool	Blackpool
Lancaster	South Lakeland, Wyre, Preston , Manchester, Leeds, Blackpool, Craven, Bradford, Wigan, Chorley , South Ribble , Cheshire East, West Lancashire	South Lakeland, Wyre, Preston , Manchester

Source: ONS Internal Migration Estimates

Commuting Flows

- 2.59 The analysis of the commuting flows provides important evidence of the functional relationships among different areas and helps in further considering the housing market geography. We have sought to consider commuting dynamics taking account of the Office for National Statistics definition of Travel to Work Areas (TTWAs), together with more detailed interrogation of commuting dynamics locally.
- 2.60 The ONS TTWAs aim to identify self-contained labour market areas in which the majority of commuting occurs within the boundary of the area. They are defined on a consistent basis nationally. It should however be recognised that in practice, it is not possible to divide the UK into entirely separate labour market areas as commuting patterns are too diffuse.
- 2.61 The TTWAs have been developed as approximations to self-contained labour markets, i.e. areas where most people both live and work. As such they are based on a statistical analysis rather than

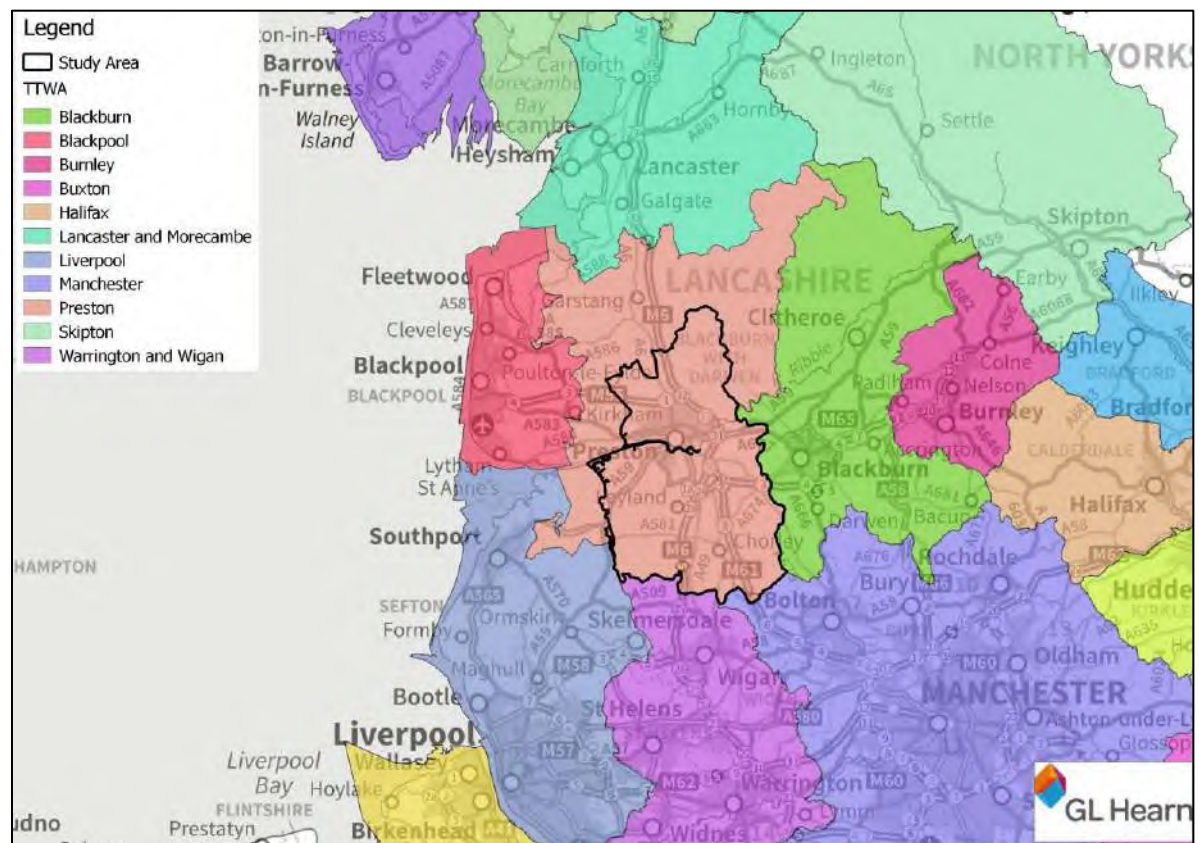
administrative boundaries. There are two types of self-containment that are analysed: the residents self-containment which is the percentage (%) of employed residents who work locally and; jobs self-containment which is the percentage (%) of local jobs taken by local residents.

- 2.62 The criteria for defining TTWAs were that at least 75% of the area's resident workforce works in the area and at least 75% of people who work in the area also live in the area in most instances. The area must also have had a working population of at least 3,500 people. However, for areas where the working population is in excess of 25,000 people, self-containment rates as low as 66.66% were accepted.
- 2.63 As illustrated in Figure 13 Central Lancashire falls entirely within the Preston TTWA (using 2011 Census data, published in 2015) which also covers parts of Wyre, Fylde and Ribble Valley administrative areas. The whole study area is included within one TTWA, which is a clear sign that suggest strong commuting patterns among the Central Lancashire authorities and reinforces the definition of a common housing market area including the three study authorities.
- 2.64 Table 6 presents the self-containment percentages of the Preston travel to work area which entirely contains the study area as well as the surrounding TTWAs. This data is based on Census 2011 and provided by ONS.

Table 6: Self-containment in travel to work areas

TTWA	Residents self-containment	Jobs self-containment
Preston	77.4	74.9
Lancaster and Morecambe	81.4	86.3
Blackpool	84.2	87.7
Liverpool	84.9	82.5
Warrington and Wigan	72.5	76.6
Manchester	91.3	88.2
Blackburn	74.0	75.9

Source: 2011 Census ONS

Figure 13: Travel to Work Areas (2011)

Source: ONS, 2015

- 2.65 Although these are statistically robust definitions of travel to work areas, they are difficult to use for HMA definitions as they usually cut across local authority boundaries. The TTWA definition supports the inclusion of Preston, South Ribble and Chorley in a common HMA, however it is appropriate to consider through further analysis whether other authorities might warrant inclusion as well.

Local Authority Flows

- 2.66 Analysis of the location of workplace for residents of Preston, South Ribble and Chorley and the location of residence of those that work in the three local authorities is presented in this section. This data draws from the Census 2011.
- 2.67 Table 7 presents the major commuting flows (>4% residents) for each local authority in the study area. Around 62% of Preston residents also work in the City with a further 9.4% working in South Ribble and 2.5% working in Chorley. Around 39% of Chorley's population work within the Borough, with a further 10.8% working in Preston and 14.8% in South Ribble. The largest percentage of South Ribble's populations work in within South Ribble itself (36.7%) and 28.3% in South Ribble and a further 8.5% work in Chorley.

- 2.68 The vast majority of residents in Central Lancashire also work within Central Lancashire with a self-containment rate of around 71%. This would indicate that by this measure the area could reasonably be considered as a HMA in its own right.

Table 7: Major Commuting flows from Preston, Chorley and South Ribble (>4%)

Place of residence	Workplace	Flows	% Residents
Preston	Preston	34,082	61.63%
South Ribble	South Ribble	17,478	36.68%
Chorley	Chorley	17,280	39.08%
South Ribble	Preston	13,492	28.32%
Chorley	South Ribble	6,537	14.79%
Preston	South Ribble	5,186	9.38%
Chorley	Preston	4,770	10.79%
South Ribble	Chorley	4,071	8.54%
Preston	Fylde	3,320	6.00%
Chorley	Bolton	2,453	5.55%
South Ribble	Fylde	2,112	4.43%
Chorley	Wigan	1,912	4.32%

Source: 2011 Census ONS

- 2.69 Table 8 presents the in-flow of commuters to the study area. This reveals that around 53% of Chorley's workforce resides in the area with a further 12% living in South Ribble and 4% in Preston. This is the highest job containment rate in the study area.
- 2.70 In addition, 42% of South Ribble's workforce lives locally with a further 16% residing in Chorley and 12% in Preston. Finally, 43% of Preston's workforce resides in the town with a further 17% living in South Ribble and 6% in Chorley. In commuting terms the workforce of Central Lancashire mainly reside within Central Lancashire with a job self-containment rate of around 69%.

Table 8: Major Commuting flows to Preston, Chorley and South Ribble (>4%)

Workplace	Place of residence	Flows	% Workforce
Preston	Preston	34,082	43.43%
South Ribble	South Ribble	17,478	42.58%
Chorley	Chorley	17,280	53.51%
Preston	South Ribble	13,492	17.19%
South Ribble	Chorley	6,537	15.93%
South Ribble	Preston	5,186	12.63%
Preston	Chorley	4,770	6.08%
Chorley	South Ribble	4,071	12.61%
Chorley	Wigan	2,048	6.34%
Chorley	Bolton	1,468	4.55%
Chorley	Preston	1,374	4.25%

Source: 2011 Census ONS

Statistically Significant Commuting Flows

- 2.71 Finally, the ONS also publish statistically significant commuting flows for each local authority. Again these are based on the range and scale of flows in each location. The results for the study area are presented in Table 9. This again highlights the importance of each local authority in Central

Lancashire to the other two while the most statistically significant in-flows of each area are from the other authorities of Central Lancashire and the most statistically significant out-flow is to at least one of other Central Lancashire authorities. It reinforces the definition of an HMA which covers the three authorities.

Table 9: Statistically Significant Commuting flows (2011-2014)

Direction (Authority)	Inward	Outward
Preston	South Ribble	South Ribble, Fylde
South Ribble	Preston, Chorley	Preston
Chorley	South Ribble, Preston, Bolton, Wigan	South Ribble, Preston
Fylde	Blackpool, Wyre, Preston	Blackpool, Preston
West Lancashire	Sefton, Wigan	Sefton, Wigan, Liverpool
Wigan	St Helen, Bolton, West Lancashire, Warrington, Salford, Chorley, Manchester	Bolton, Salford, St Helens, Manchester, Liverpool, Warrington, West Lancashire, Trafford
Bolton	Wigan, Salford, Bury	Manchester, Wigan Salford, Bury
Blackburn with Darwen	Hyndburn, Ribble Valley	Hyndburn, Preston, Ribble Valley, Bolton, South Ribble, Burnley
Ribble Valley	Blackburn with Darwen, Hyndburn, Preston, Burnley, South Ribble, Pendle	Blackburn with Darwen, Hyndburn, Preston, Burnley
Wyre	Blackpool	Blackpool
Lancaster	South Lakeland, Wyre	South Lakeland, Preston

Source: ONS Internal Migration Estimates

- 2.72 The evidence points to some wider links between Preston and Fylde, Blackburn with Darwen and Lancaster, but these are less strong than those between the three Central Lancashire authorities.

Conclusions on the HMA Geography

- 2.73 The PPG sets out that a Housing Market Area is “a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate.”
- 2.74 In drawing the analysis together there is clearly strong links between the commissioning authorities of Preston, South Ribble and Chorley. Analysis of the CURDS HMA geographies (particularly the "Silver Standard" preferred by PAS identifies the study area, comprising the three local authorities, as a unique Housing Market Area.

- 2.75 The analysis of Census data highlights that the most significant migration flows involving the commissioning authorities are with each other. Together the three authorities achieve a high self-containment of 82-83% (excluding long-distance flows), well above the typically 70% threshold identified in the PPG.
- 2.76 The house price analysis reveals strong correlation between Chorley and South Ribble. Preston's housing market slightly differs from the other two councils mainly because the area is more urban and the profile of potential buyers or tenants differs slightly. Values for mid-market semi-detached properties are very similar across the three authorities.
- 2.77 In terms of commuting flows, the analysis reveals a strong inter-relationship between the commissioning authorities. The commissioning authorities lie within one TTWA which also extends to parts of Wyre, Fylde and Ribble Valley administrative areas with this area including the main settlements in the three authorities together with Garstang.
- 2.78 The commuting analysis reveals a self-containment rate of 71%-74% within the study area which is relatively strong. It also showed that both the major gross and the statistically significant commuting flows at a local authority level the commissioning authorities have the strongest links to each other. We conclude that there is undoubtable evidence to suggest that the three commissioning authorities have strong correlation and should be considered to be in a common housing market area.
- 2.79 **The triangulation of the sources strongly supports placing the commissioning authorities of Chorley, Preston and South Ribble within a common and unique Housing Market Area.** There is a high level of self-containment in Central Lancashire in both migration and commuting terms and house price dynamics are similar. Other authorities have less strong relationships.
- 2.80 However, the functional market areas clearly do not precisely fit to local authority boundaries; and at the borders of any area which is defined there are often links with the adjoining areas. We recognise these localised interactions across borough boundaries. In particular there are notable inter-relationships with: Fylde Borough, Ribble Valley Borough, Wyre Council, Blackburn with Darwen, Wigan, Bolton and West Lancashire and Lancaster but these can be localised relationships and the evidence does not point to these authorities falling within a common HMA overall.
- 2.81 Apart from the adjacent authorities the analysis reveals notable links with Manchester, Blackpool and Liverpool. Whilst these external relationships do not affect the definition of Central Lancashire as a HMA, they may be relevant through the duty to cooperate.

Summary: Housing Market Area

- In market-terms (as reflected in the house price analysis) there are some distinction particularly in relation to the urban areas of Preston and more rural areas of Chorley, South Ribble and indeed northern Preston.
- Both migration and Travel to Work patterns identify a degree of self-containment which exceeds expected thresholds for housing market areas. Preston has primacy within the study area with a high level of migration self-containment in its own right with the other local authorities' strongest migration patterns being with the City. The evidence however clearly shows close inter-relationships between the three authorities supporting the identification of a common housing market area.
- Preston is by far the largest employment location within the study area. This is also reflected in the ONS travel to work area definition which extends across the commissioning authorities and into parts of Wyre, Fylde and Ribble Valley administrative areas. The three authorities all fall within the Preston TTWA.
- In GL Hearn's view, the triangulation of the sources strongly supports defining a single HMA and FEMA across the Central Lancashire area. It is however important to recognise housing market overlaps between authorities in this area.

3 CHARACTERISTICS OF THE HOUSING MARKET

Introduction

3.1 This chapter sets out the baseline context for the study. It firstly looks at the population for the HMA as well as the local labour market, and then goes on to profile the areas housing stock. This information is largely drawn from Census data, although where more up to date information is available, this has been used.

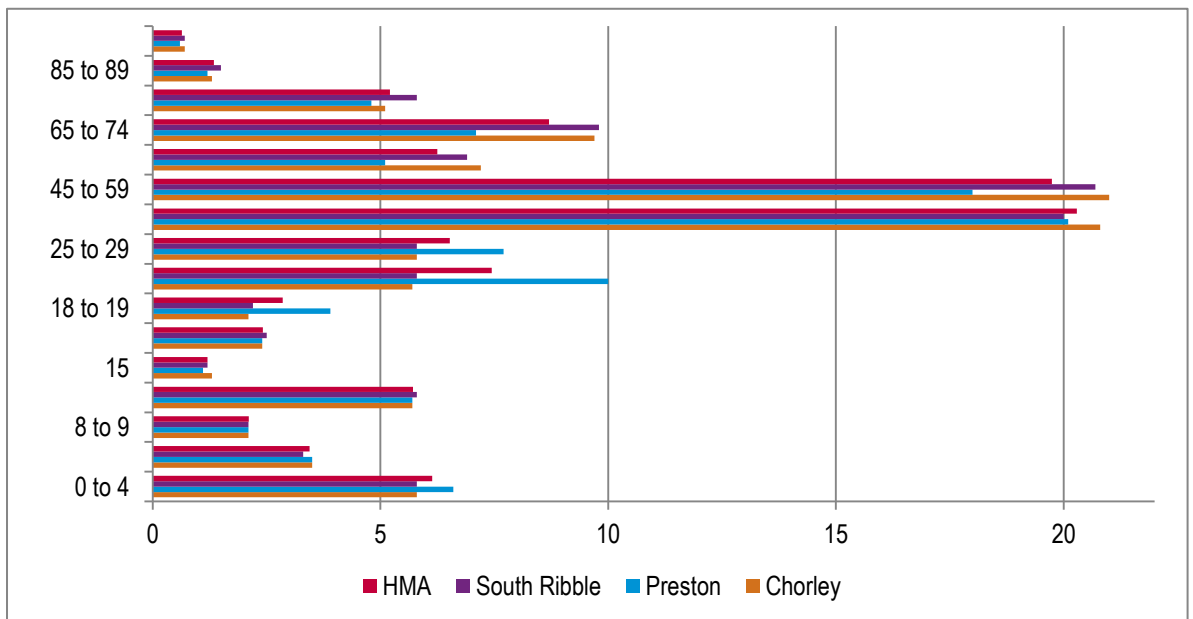
Population Characteristics

3.2 In 2011 the HMA has a population of just over 356,000 people. With 140,000 people, Preston is the most populated of the three local authorities. Chorley and South Ribble have similar populations at 107,000 and 109,000 respectively. By 2015 the population has grown to 363,000 - a growth of around 7,500 or 2.1%. The vast majority of the growth took place in Chorley which saw its population by 5,800 or 5.4%. This was influenced in part by stronger relative housing delivery over this period.

Age Structure

3.3 Figure 14 illustrates the population age structure in each local authority. Around 40% of the population in the HMA are aged between 30 and 59 years old. The next largest age group is that aged 65-74.

Figure 14: Age Structure



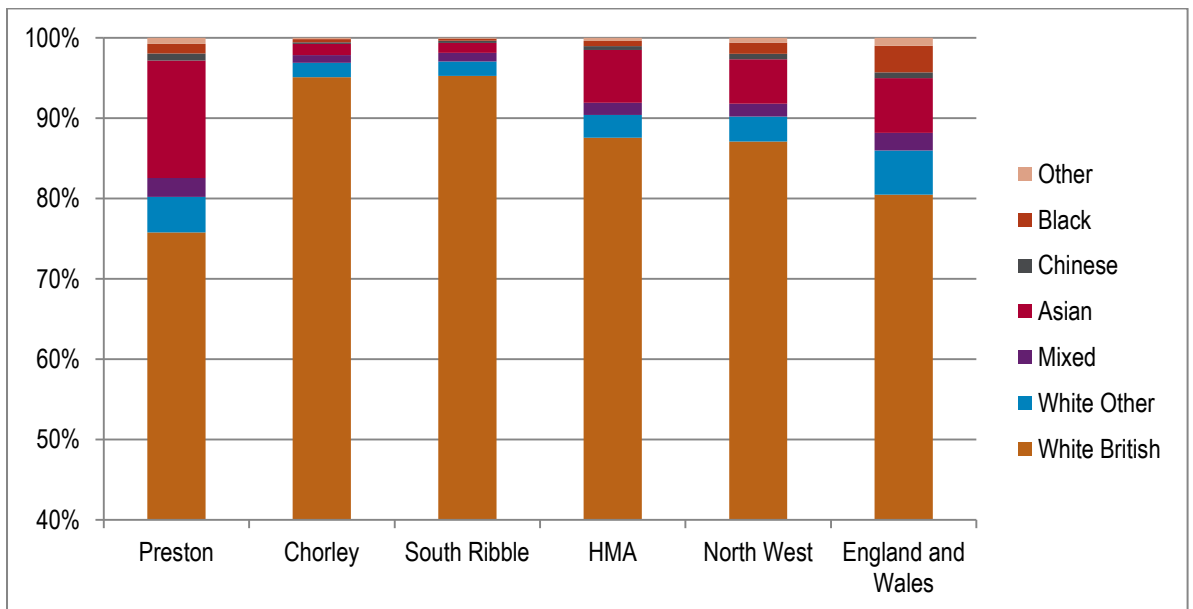
Source: Census 2011

3.4 In Preston, there are relatively high percentages of 20 to 24 and 25 to 29 age bands resulting from the University of Central Lancashire’s presence in the area; as well as the general preference of young adults of locating in urban environments. All areas have a relatively consistent school-age population although Preston has a notably higher pre-school aged population. South Ribble has a particularly high representation of people in retirement age categories. Chorley has a relatively high concentration of people in the older working age categories 45-59 and 60-64.

Ethnic Profile

3.5 The Central Lancashire HMA is relatively diverse area, particularly Preston where around a quarter of the population is not White British. The largest non-white British groups in the HMA are Asian/Asian British, particularly Indian.

Figure 15: Ethnicity (2011)



Source: Census 2011

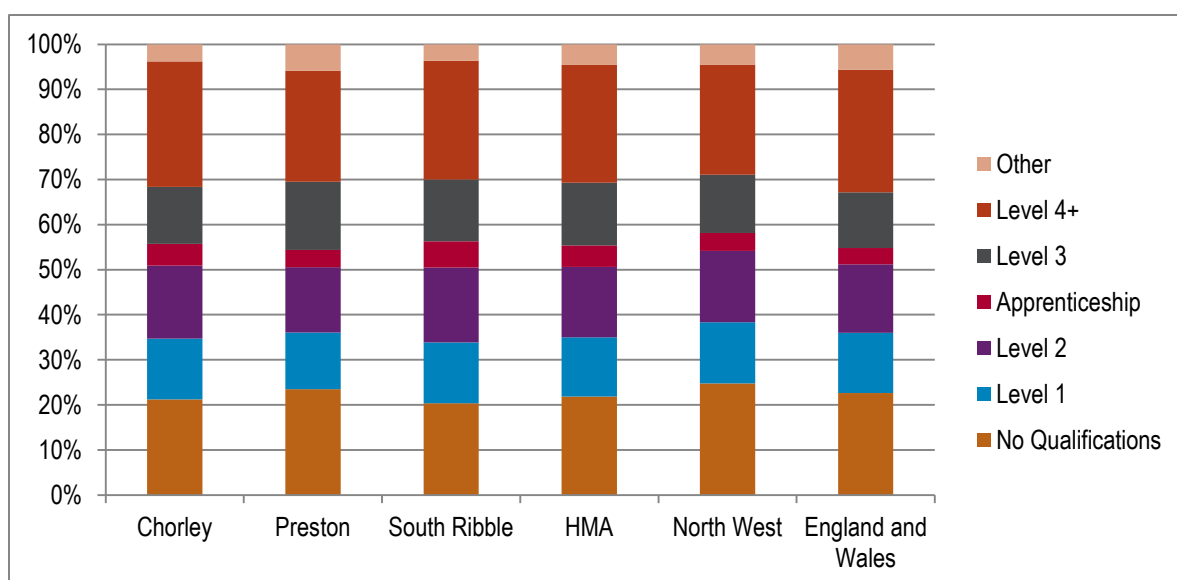
3.6 In contrast to Preston, the Black and Minority Ethnic (BME) population in both Chorley and South Ribble is less than the national and regional averages. In both areas, the White British population comprises over 95% of the total population.

Labour Market

Qualifications

- 3.7 The profile of skills/ qualifications in the HMA is broadly similar to the wider comparators. People with Level 4+ qualifications (equivalent to an undergraduate degree level) represent 26% of the HMA population aged 16 and over, whereas the regional equivalent is 24% and the national 27%.
- 3.8 The highest concentration of population with at least a Level 4 qualification is found in Chorley (28%), followed by South Ribble (26.5%). Despite having a University, only 24.6% of Preston’s population aged 16 and over are qualified to a degree level. This is still above the regional figure, but below the national figure.

Figure 16: Qualification (2011)



Source: Census 2011

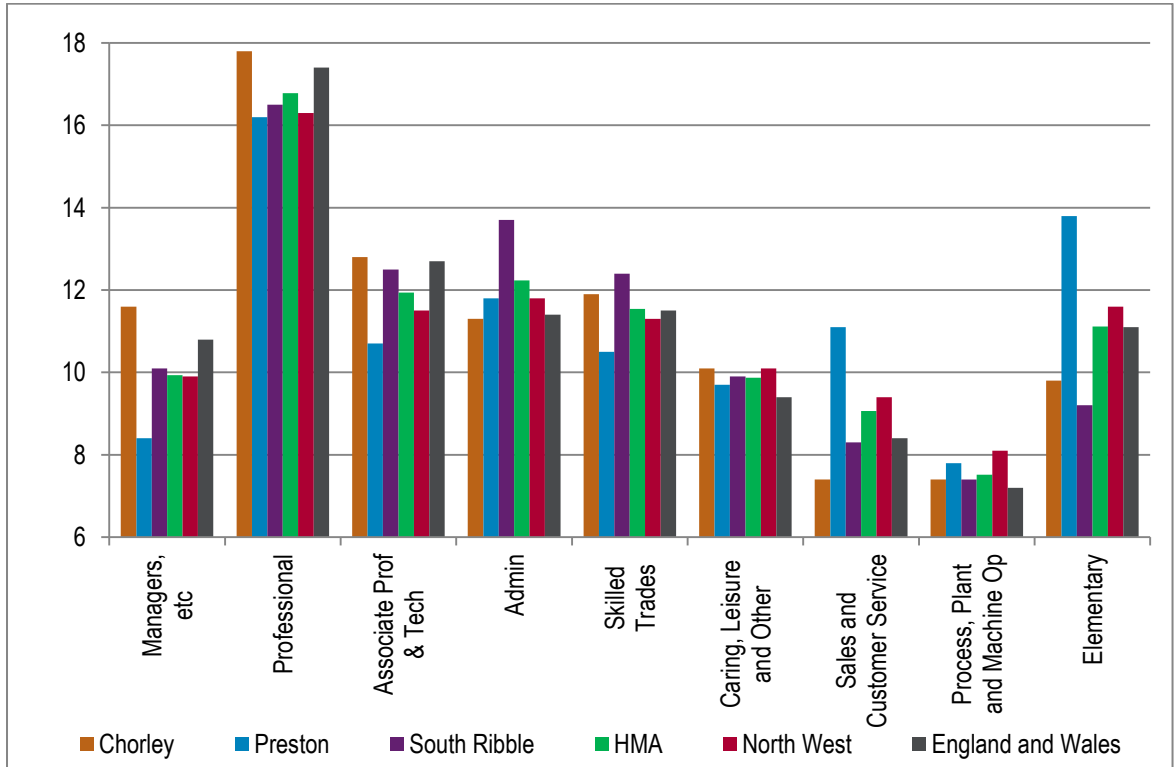
- 3.9 Conversely Preston has the highest percentage of population aged 16 and over with no qualifications (23.5%) while across the HMA the equivalent figure is 21.8%. The HMA figure is below both the regional (24.8%) and national figures (22.7%).

Occupation Level

- 3.10 The occupation breakdown across the HMA is in general similar to the national trends. However there are some notable differences within the HMA. Professionals are the largest occupational group across all areas. Compared to the regional and national figures, the HMA has a high concentration of population working in administrative and skilled trade roles.

3.11 Chorley has a particularly high concentration of residents working in three highest categories of Managerial, Professional and Associate Professional and Technical roles. In contrast Preston has high concentrations in the three lowest occupation levels, sales, process and elementary occupations.

Figure 17: Occupation and Skills



Source: Census 2011

3.12 South Ribble has comparatively high concentrations of its population working in administrative and skilled occupations. Conversely it has the lowest percentage of residents working in elementary occupations among the three local authorities and the wider comparators.

Housing Stock and Supply

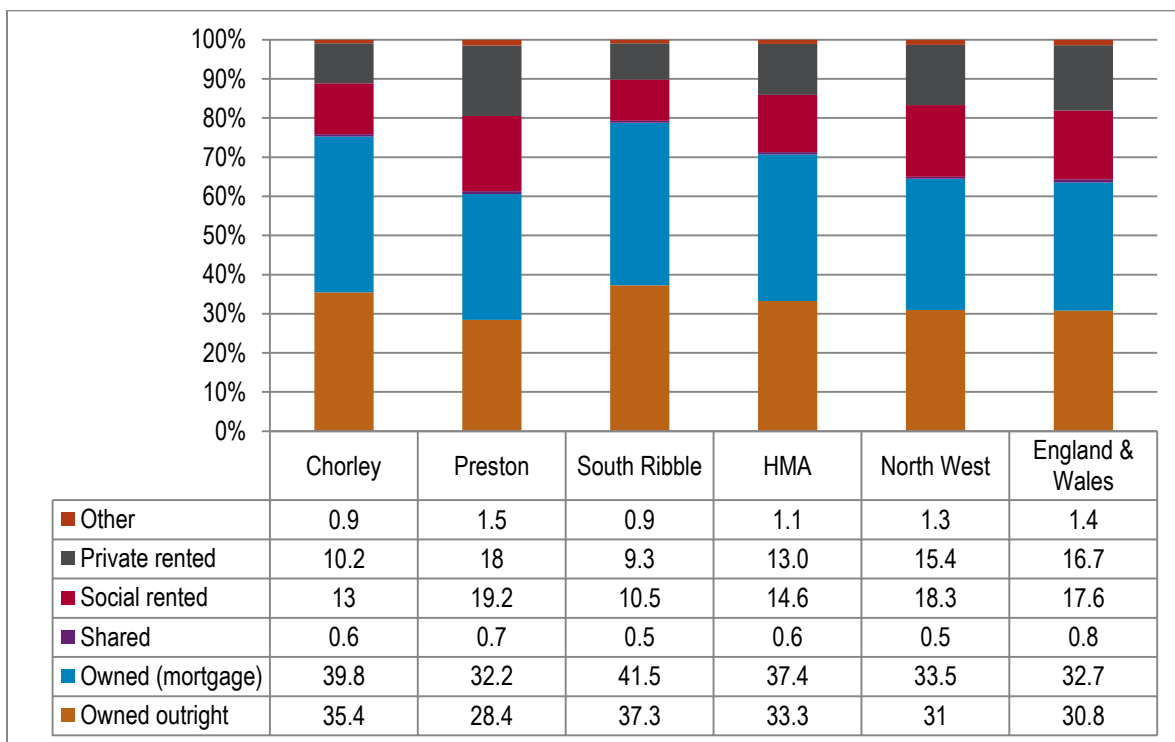
Tenure Profile

3.13 The tenure profile, taken from the 2011 Census, is dominated by owner occupied households. Across the HMA over 70% of all households either own their home outright or with a mortgage. This compares to 64.5% in the North West and 63.5% nationally. The highest proportions of households who owned outright or with a mortgage can be found in South Ribble (78%) followed by Chorley (75%).

3.14 Across the HMA almost 15% of households are in socially rented properties. This rises to 19% of households in Preston. By comparison the equivalent figures for the North West is 18.3% and 17.6% nationally.

3.15 The third largest tenure group across the HMA is the private rented sector (13%). The highest proportion is in Preston (18%) and lowest is in South Ribble (9.3%). To put into context, the national average equals to 16.7% and the regional figure 15.4%.

Figure 18: Tenure Profile % (2011)

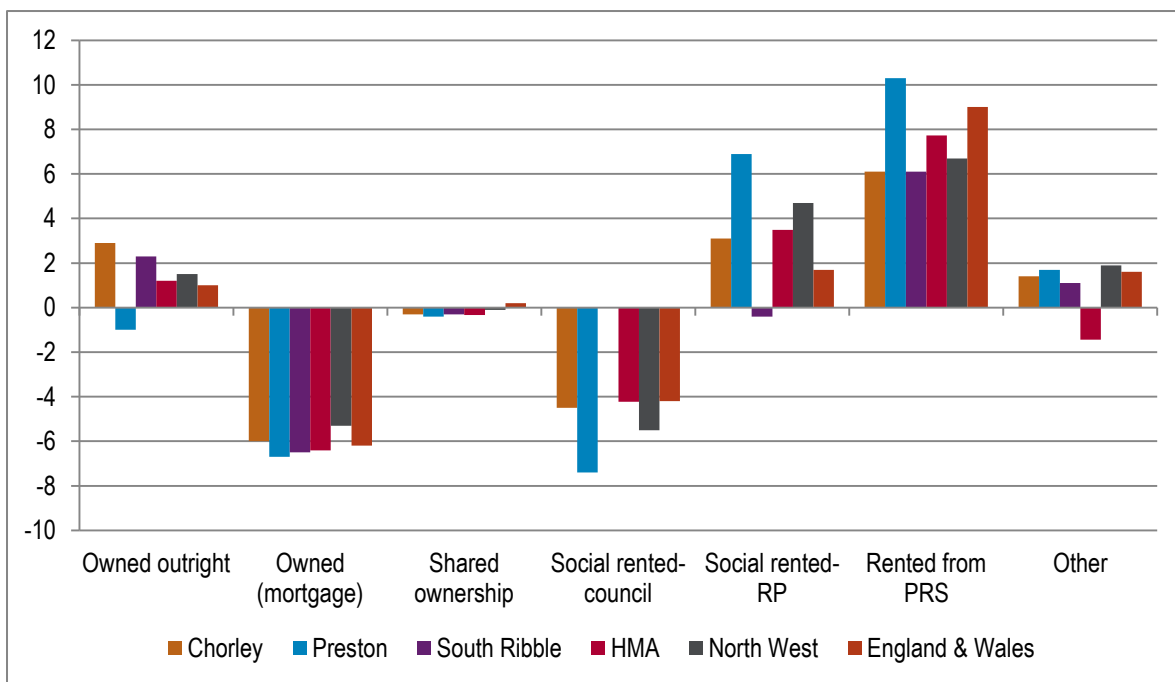


Source: Census 2011

3.16 Consistent with the national trend, the number of (younger) owner occupiers with a mortgage fell between 2001-11; and those living in the Private Rented sector grew. This trend was seen to a greater degree in Preston than South Ribble or Chorley. Across HMA there had been a decrease of 6.4pp in ownership with a mortgage or loan, which is higher than both the regional and national decrease of this tenure.

3.17 During 2001-11 many Councils transferred their housing stock to registered housing providers. This is likely to have been the case in Preston and Chorley's while there was no notable shift in South Ribble.

Figure 19: Tenure composition change between Census 2001 and 2011 (% households)



Source: Census 2011& 2001

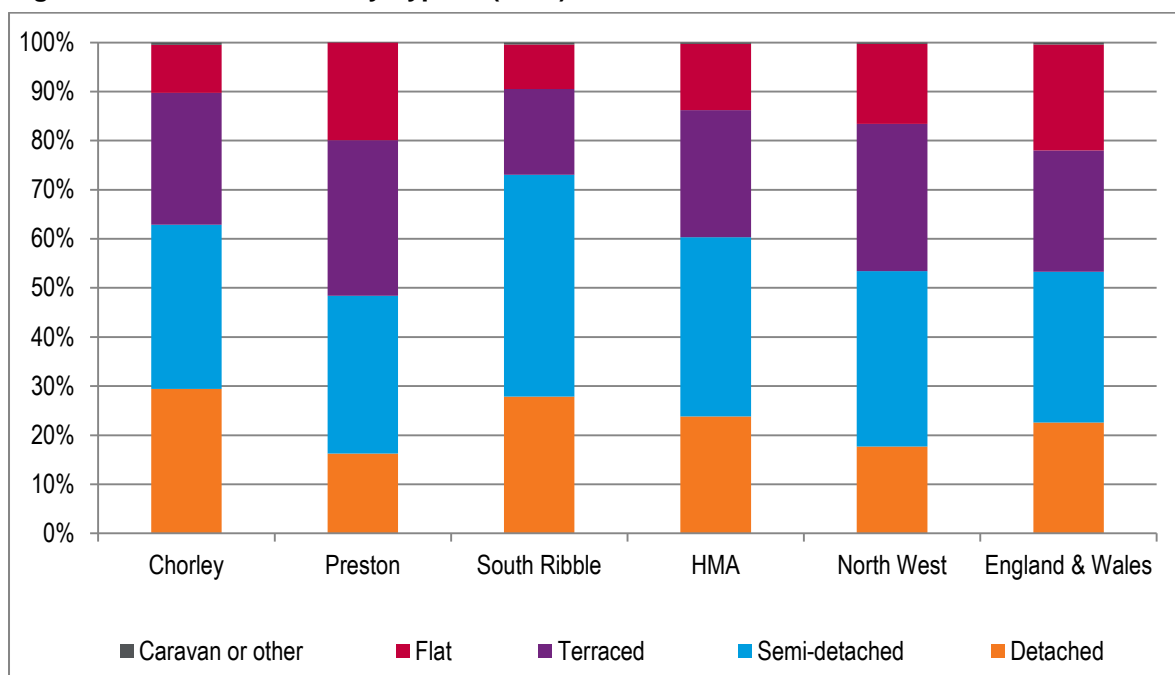
3.18 Across the HMA overall, there was a decrease of social renting from the council equal to the national comparator (-4.2%) and smaller than the regional one (-5.5%). Conversely renting from registered providers increased by 3.5% in the HMA while nationally the equivalent figure was 1.7% and across the North West it was 4.7%.

Dwelling Types

3.19 Across all three authorities, the most common dwelling type is semi-detached properties. Across the HMA these equate to over 36% of all residential dwellings. With the exception of caravans the least common dwelling type were flats, although in Preston these were more common than detached homes (as is typical for larger urban areas). Chorley has the highest volume of detached properties (29.4%) and South Ribble of semi-detached (45.2%).

3.20 Across the HMA, there is a greater proportion of detached and semi-detached properties when compared to the regional and national percentages. On the contrary, the HMA has a much lower proportion of flats (13.5%) in comparison with the North West (16.3%) and England & Wales (21.6%).

3.21 Compared to wider comparators, Preston has similar stock composition to the North West and England & Wales; while the other two authorities have in more larger properties (detached and semi-detached premises).

Figure 20: Profile of Stock by Type % (2011)

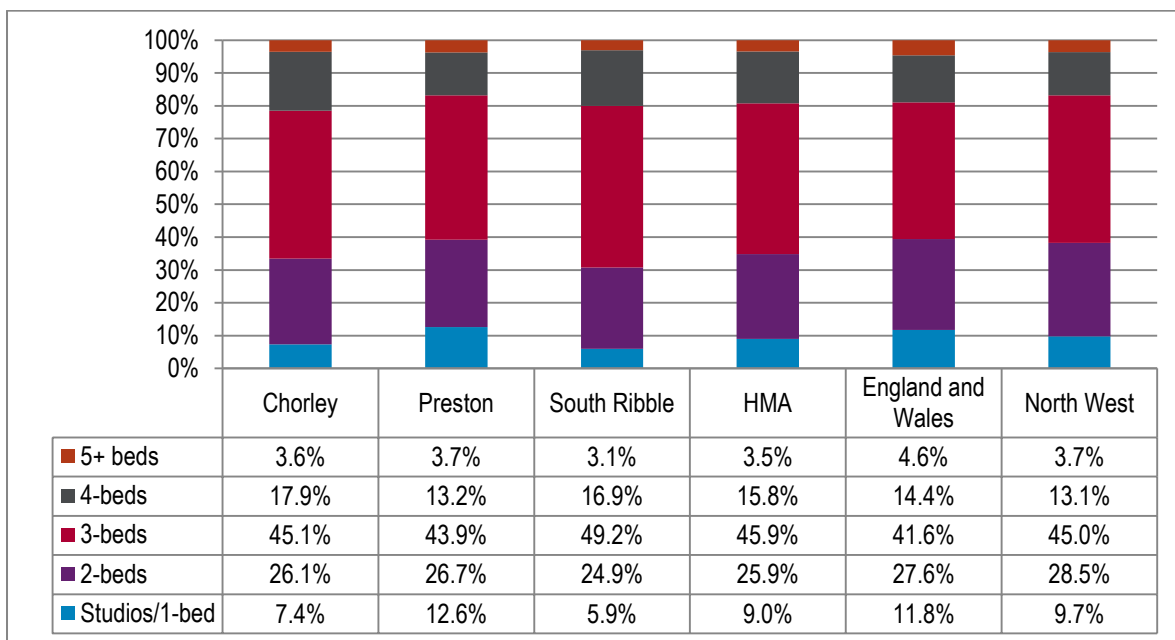
Source: Census 2011

- 3.22 In total, there are 455 caravans across the HMA, the greatest number of which are in Chorley and to a lesser extent South Ribble. There are only 33 caravans in Preston.

Housing Size

- 3.23 The size mix of housing in Central Lancashire is dominated by three bedroom homes which represent almost 46% of the stock in HMA (Figure 21). Less than 10% of the total stock are 1-bedroom homes or studios. This compares to 12% nationally but is broadly in line with the North West figure. Preston has the largest proportion of 1 bedroom flats (12.6%), which is above the national comparator (11.8%) which is an indication of its urban character.
- 3.24 Two bedroom properties represent the 26% of the HMA's stock and are evenly proportioned across the study area. The wider comparators areas considered in general have slightly higher percentages of one and two bedroom properties and lower of more than 3 bedroom properties compared to the HMA.

Figure 21: Housing Size (%)



Source: Census 2011

3.25 The largest percentage of properties with five bedrooms or more are found in Preston (3.7%). This is a similar proportion to the North West, but below the national figure (4.6%). The HMA figure is 3.5%.

Summary: Demographic Baseline

- On review of the population data a picture emerges where Chorley is the most affluent of the three local authorities with higher levels of better skilled and higher qualified population. In contrast Preston has a younger population and profile more characteristic of larger urban areas. Its skills/ qualifications profile is not as strong. South Ribble has the oldest population structure.
- The HMA has a high percentage of owner occupied properties although since 2001 there has been some shift towards the private rental sector. Preston has a particularly high percentage of households living within the private rental sector, influenced by its younger population.
- Three bedroom properties and semi-detached homes are the most common typologies in the HMA. South Ribble and Chorley have particularly high percentages of detached homes; however, Preston has a higher percentage of larger 5+ bedroom properties.

4 DEMOGRAPHIC LED PROJECTIONS

- 4.1 In this section consideration is given to demographic evidence of housing need and trend-based projections. Such projections are critical to the SHMA process and this is emphasised in the NPPF (para 158) which states that local planning authorities should prepare a SHMA to identify the scale of housing which *'meets household and population projection, taking account of migration and demographic change'*.
- 4.2 The importance of such projections can also be seen in the PPG which states [2a-015] that *'household projections published by [CLG] should provide the starting point estimate of overall housing need'*. The CLG Household Projections are directly linked to ONS Sub-National Population Projections (SNPP). Further emphasis is put on the CLG projections in 2a-017 where it is noted that *'the household projections... are statistically robust and are based on nationally consistent assumptions'*.
- 4.3 However, the PPG also identifies [2a-014] that *'establishing future need for housing is not an exact science. No single approach will provide a definitive answer'* and in 2a-017 notes that *'plan makers may consider sensitivity testing, specific to their local circumstances'* – this is particularly related to evidence that there have been particular events which may have impacted on migration or the profile of the local population. Furthermore, the PPG notes [2a-016] that *'where possible, local needs assessments should be informed by the latest available data'* – this is relevant in this area due to new population estimates having been published since the release of the last SNPP.
- 4.4 The PAS Technical Advice Note provides some additional detail about sensitivity testing and in particular advises (para 6.24) that using a longer (10- to 15-year) past trend analysis should provide a more robust projection than the SNPP (which uses data from the previous 5-6 years). The PAS technical advice note also highlights the issue of Unattributable Population Change (UPC) – UPC is an adjustment made by ONS for discrepancies between Census data and annual monitoring. PAS states (para 6.35) that *'plan makers may take a view that the UPC, or part of it, should be included in the base period as past migration'*.
- 4.5 On the basis of the advice in both the PPG and the PAS Technical Advice Note a number of observations can be made which are relevant to the assessment of trend-based demographic projections:
- CLG household projections (which link to ONS population projections) are robust and should be used as the *'starting point'* for assessing housing need;
 - These projections can be sensitivity tested where there is evidence of changes over time (e.g. short-term changes to migration patterns) or where UPC may be related to recorded migration levels; and
 - Up-to-date information should be used where possible and this will include later releases of ONS mid-year population estimates (MYE).

- 4.6 It is considered in looking at sensitivities to demographic projections that the suggested level of need can go down as well as up. This is on the basis of a 'common sense' approach whereby any increase in migration in one area will come with a commensurate decrease in other locations, particularly within a common housing market area. It is also recognised that levels of population growth for individual local authorities (nationally) will need to sum to the total level of growth projected nationally (through ONS national population projections).
- 4.7 In considering whether or not projections can be increased or decreased from ONS figures, some general trends should also be understood. In particular, it has been evident since about 2008 (the start of recession) that population growth has been relatively strong in many urban areas – this looks to be driven by a reduced trend of out-migration from such locations (which is likely to be linked to factors such as mortgage finance constraints). This has meant that more rural locations have typically seen lower levels of population growth than previously. These trends have not been observed universally across different types of locations but can give an insight into whether or not it is reasonable to move away from official projections.
- 4.8 In understanding what a reasonable projection is a number of factors can be considered. In particular, this would include overlaying past and projected population growth (to see if there is a correlation) and also to compare past and projected levels of migration – this needs to recognise that migration may well be expected to change over time as the age structure of the population changes.
- 4.9 Overall, it is clear that developing the most reasonable and realistic projections for housing need is far from straightforward and will involve a degree of professional judgement. The need for judgment can clearly be seen in a recent High Court case in Kings Lynn (CO/914/2015) where it is noted that *'this is a statistical exercise involving a range of relevant data for which there is no one set methodology, but which will involve elements of judgment about trends and the interpretation and application of the empirical material available'*.

Demographic Profile of Central Lancashire

- 4.10 The analysis below looks at the population profile in Central Lancashire, including past levels of population change, the components of this change (e.g. births, deaths and migration) and the age structure. Where relevant, comparisons are made with other areas (the North West region and England). The analysis uses 2016 as a base date, due to this being the date for which the most recent information was available at the time of writing (from ONS mid-year population estimates).

Overall population levels and changes

- 4.11 The population of Central Lancashire in 2016 was estimated to be 366,270. This is an increase of 31,400 people since 2001 – a 9.4% increase over the 15-year period. This level of population growth is above that seen across both Lancashire and the North West but below the level of growth seen nationally (12.8%). The data also shows notably stronger growth in Chorley and a lower level of growth in South Ribble.

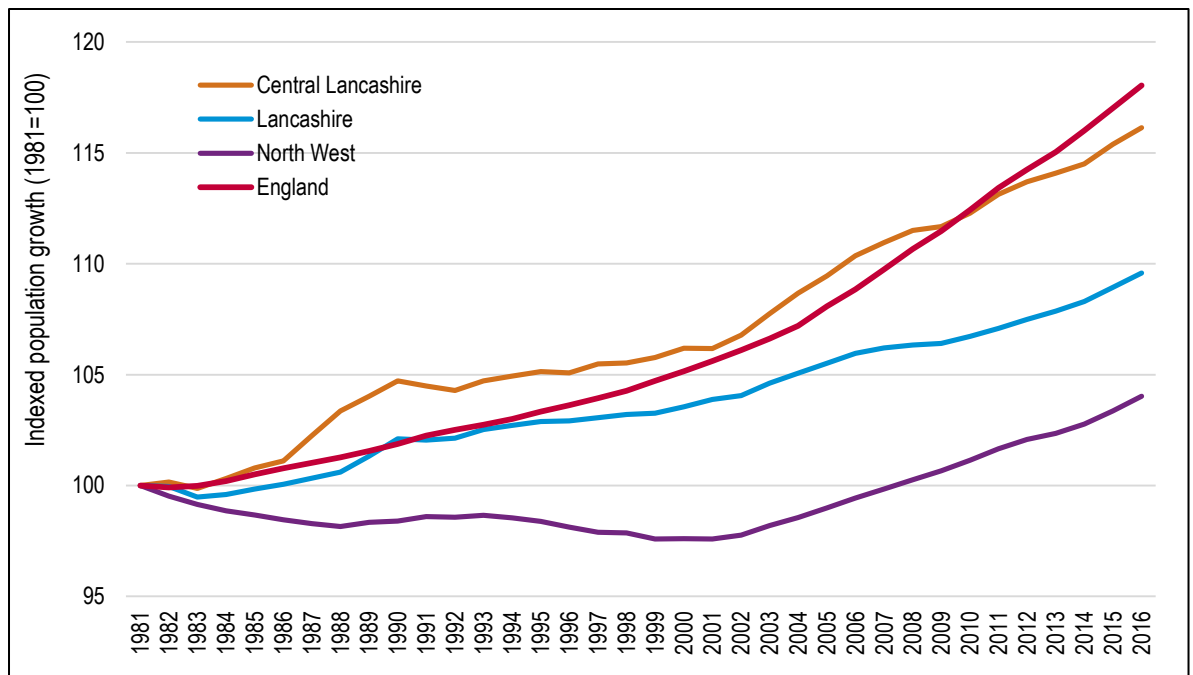
Table 10: Population Growth (2001-16)

Area	Population 2001	Population 2016	Change in Population	% change
Chorley	100,559	114,351	13,792	13.7%
Preston	130,372	141,801	11,429	8.8%
South Ribble	103,949	110,118	6,169	5.9%
Central Lancashire	334,880	366,270	31,390	9.4%
Lancashire	1,136,542	1,198,798	62,256	5.5%
North West	6,772,985	7,219,623	446,638	6.6%
England	49,449,746	55,268,067	5,818,321	11.8%

Source: ONS (mid-year population estimates)

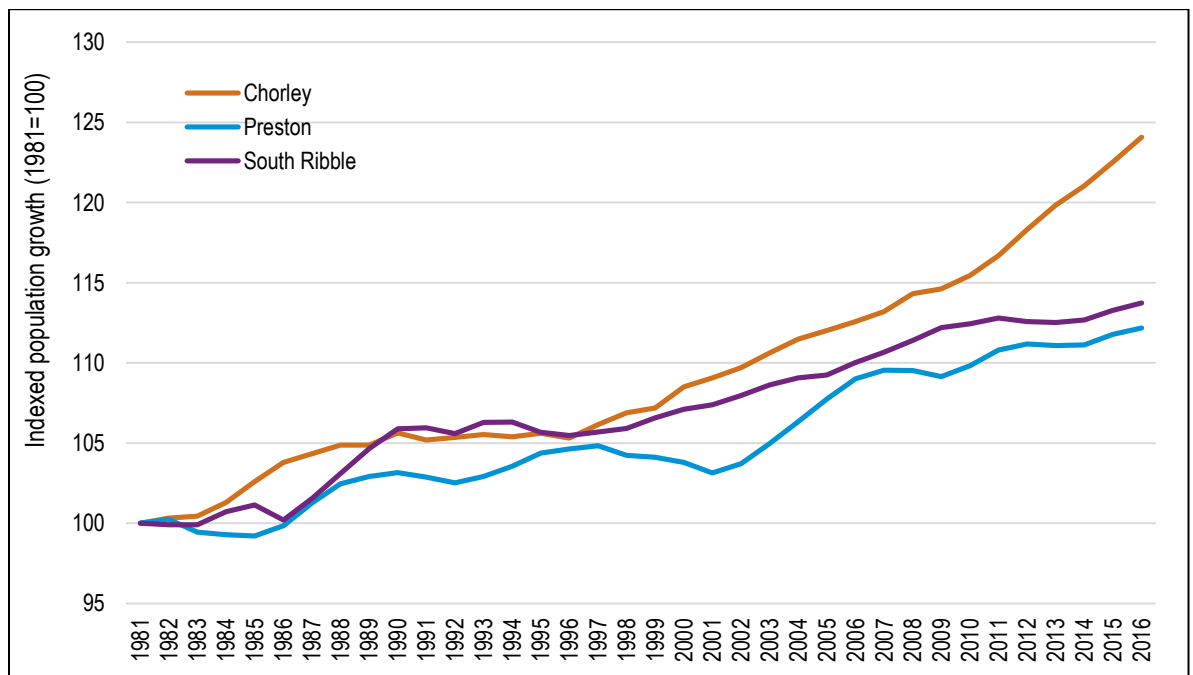
- 4.12 Analysis can also be provided to consider longer-term trends in population growth with data being available back to 1981. The data shows that over the longer-term population growth across the HMA has been quite strong in comparison with other areas (particularly when compared with the North West. From 1981 to 2015 the population of the HMA grew by 16%, compared with 10% across the County and 4% across the North West. The overall level of growth is however slightly below the national figure (of 18%). Over this same period, the population of Chorley grew most strongly, increasing by 24% from 1981 to 2015.

Figure 22: Indexed population growth (1981-2016)



Source: ONS (mid-year population estimates)

Figure 23: Indexed population growth (1981-2016) – local authorities



Source: ONS (mid-year population estimates)

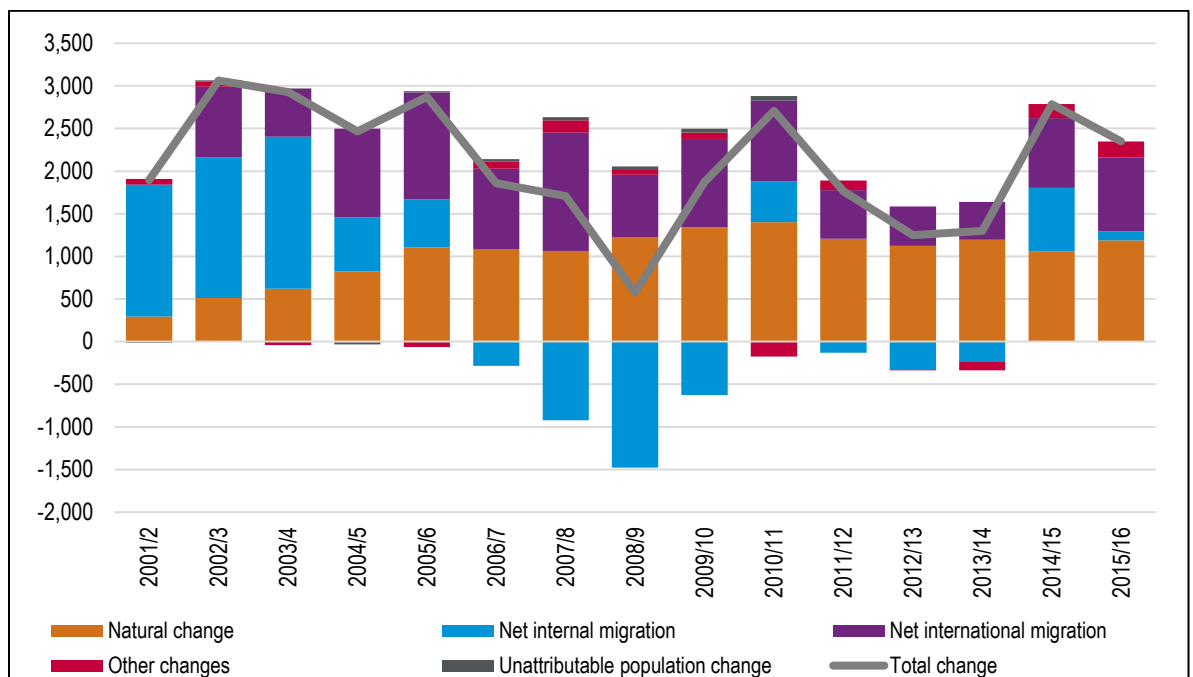
Components of past population change

4.13 Figure 24 and Table 11 consider the drivers of population change in Central Lancashire from 2001 to 2016 (2001 being the base date from which detailed figures are available). Population change is

largely driven by natural change (births minus deaths) and migration although within ONS data there is also a small other changes category (mainly related to armed forces and prison populations) and an unattributable population change (UPC) – this is an adjustment made by ONS to mid-year population estimates where Census data has suggested that population growth had either been over- or under-estimated in the inter-Census years. Because UPC links back to Census data a figure is only provided for 2001 to 2011.

- 4.14 The figure shows that both natural change and net migration have been the drivers of population change. Looking back to 2001, it can be seen that natural change has generally been increasing, although this increase has been levelling off over the past few years. Migration was particularly strong earlier in the 2001-15 period (notably until about 2006) but has been relatively weak since; although the most recent two years for which data is available (2014-16) show an increase in migration. Lower levels of net migration in the 2008/9 to 2014 period are notable, as this period feeds into the most recent (2014-based) ONS subnational population projections (SNPP) – these are discussed in more detail later in this section.
- 4.15 Overall, the number of births has typically exceeded the number of deaths by around 1,000 per annum since 2001. With regards to migration; the data shows an average level of net migration of about 1,030 people per annum on average (with about 790 of this being international migration). Other changes are quite small and the data also shows a small (and insignificant) level of UPC.

Figure 24: Components of population change, mid-2001 to mid-2016 – Central Lancashire



Source: ONS

Table 11: Components of population change, mid-2001 to mid-2015 – Central Lancashire

Year	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	292	1,538	15	63	-14	1,894
2002/3	512	1,647	830	66	8	3,063
2003/4	620	1,785	561	-41	4	2,929
2004/5	823	634	1,041	-7	-25	2,466
2005/6	1,103	566	1,253	-64	13	2,871
2006/7	1,084	-284	944	84	29	1,857
2007/8	1,062	-923	1,390	143	37	1,709
2008/9	1,222	-1,478	736	56	42	578
2009/10	1,342	-626	1,035	76	46	1,873
2010/11	1,400	478	950	-176	54	2,706
2011/12	1,205	-129	573	113	0	1,762
2012/13	1,123	-327	463	-10	0	1,249
2013/14	1,195	-240	442	-98	0	1,299
2014/15	1,057	747	819	163	0	2,786
2015/16	1,187	106	867	188	0	2,348

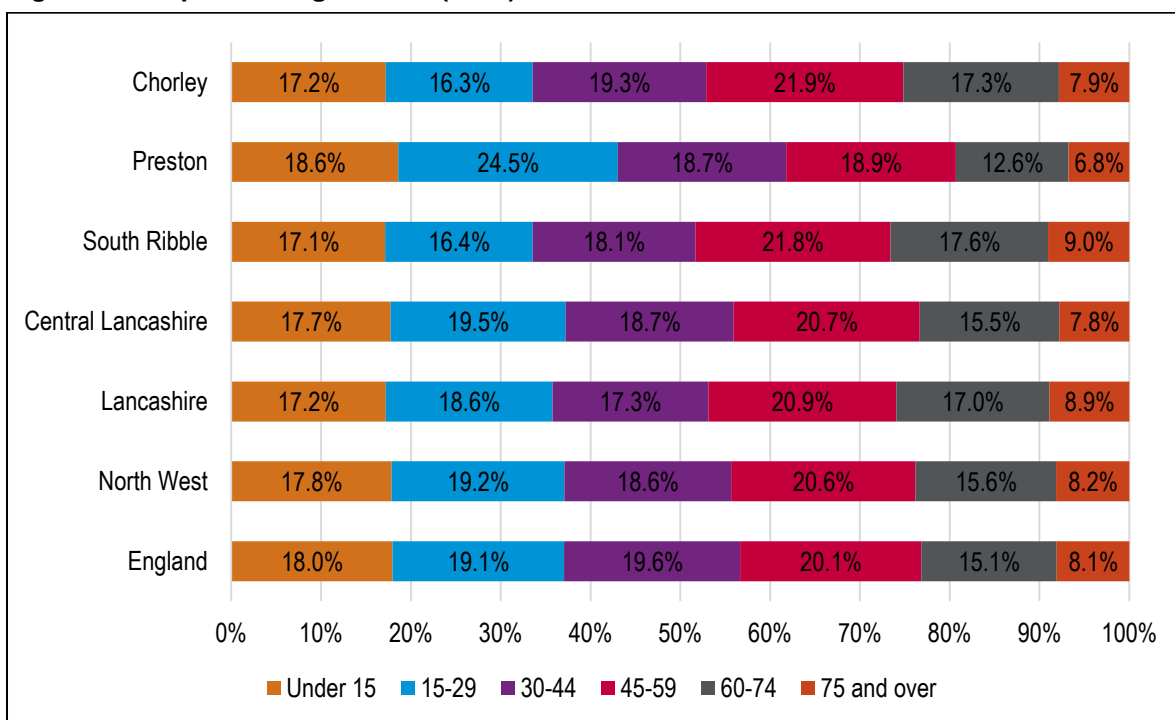
Source: ONS

- 4.16 Data in Appendix A shows the same information for each local authority; from this it is clear that the different locations have notably different patterns of population change. Chorley in particular has seen very strong growth over the past few years, whilst both Preston and to a lesser extent South Ribble saw stronger growth in the early part of the 2001-16 period and have seen more modest growth over the past few years. Historical housing delivery appears to have had an influence on this.

Age Profile and Past Changes

- 4.17 The age profile of the population of Central Lancashire is similar to that seen regionally and nationally, although the population is relatively 'young' when compared with the County. In 2016, a total of 23% of the population of Central Lancashire was aged 60 and over, compared with 26% in Lancashire, 24% regionally and 23% for the whole of England. Within Central Lancashire, the population of Preston is notably 'younger' than in other areas – this is particularly driven by a large proportion of people aged 15-29, which in turn is likely to be related to the student population.

Figure 25: Population Age Profile (2016)



Source: ONS 2016 mid-year population estimates

4.18 The table below shows how the age structure of the population has changed over the 2001 to 2016 period. The data shows the most significant growth to have been in the 60-74 age group, with this group also showing the highest proportionate increase. Increases have also been seen in the 15-29 and 45-59 age groups (increasing by 11-16%). The population aged 75 and over has increased by around 5,900 people; a 26% increase. The analysis also indicates a decline in the population aged 30-44 and only a modest change in the number of children (population aged under 15).

Table 12: Change in Age Structure (2001-2016) – Central Lancashire

Age group	2001	2016	Change	% change
Under 15	63,312	64,938	1,626	2.6%
15-29	64,353	71,449	7,096	11.0%
30-44	75,584	68,560	-7,024	-9.3%
45-59	65,542	75,842	10,300	15.7%
60-74	43,484	56,940	13,456	30.9%
75 and over	22,605	28,541	5,936	26.3%
Total	334,880	366,270	31,390	9.4%

Source: ONS mid-year population estimates

4.19 The same analysis has been carried out for the individual local authorities and a range of comparator areas (Table 13). The data identifies that population profile changes in Central Lancashire are fairly similar to that seen regionally and nationally. There are however some notable differences within the different local authorities; Preston has seen relatively little ‘ageing’ of the

population, whilst both Chorley and South Ribble have seen more substantial increases in the population aged 60 and over.

Table 13: Change in Age Structure (2001-2015)

Area	Under 15	15-29	30-44	45-59	60-74	75 and over	Total
Chorley	6.2%	6.9%	-5.2%	15.3%	53.2%	36.8%	13.7%
Preston	4.6%	18.2%	-7.8%	20.9%	10.3%	10.2%	8.8%
South Ribble	-3.5%	3.1%	-15.2%	10.8%	34.1%	36.0%	5.9%
Central Lancashire	2.6%	11.0%	-9.3%	15.7%	30.9%	26.3%	9.4%
Lancashire	-4.7%	9.0%	-15.3%	12.6%	28.6%	20.4%	5.5%
North West	-1.1%	10.8%	-10.7%	15.0%	22.1%	17.7%	6.6%
England	6.9%	12.8%	-3.7%	19.4%	28.2%	20.1%	11.8%

Source: ONS mid-year population estimates

Demographic Evidence of Housing Need – Starting Point Projections

- 4.20 The PPG [2a-015] states that ‘household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need. The household projections are produced by applying projected household representative rates to the population projections published by the Office for National Statistics. Projected household representative rates are based on trends observed in Census and Labour Force Survey data’.
- 4.21 The most up-to-date projections are the 2014-based CLG household projections published in July 2016. These projections were underpinned by ONS (2014-based) subnational population projections (SNPP) – published in May 2016. The table below sets out levels of household growth expected by the CLG household projections in the 2014-34 period. Data is also provided for the North West and England for comparative purposes.
- 4.22 Across the whole HMA, the CLG household projections show household growth of about 18,200 (this is a 12% increase); the same as the equivalent figure for the North West but some way below the projection for England (19%). Growth is projected to be highest in Chorley (21%) and relatively modest in both Preston and South Ribble (at about 8% in each case).

Table 14: Household change 2014 to 2034 (2014-based CLG household projections)

Area	Households 2014	Households 2034	Change in households	% change
Chorley	46,998	56,975	9,977	21.2%
Preston	57,936	62,576	4,640	8.0%
South Ribble	46,704	50,266	3,562	7.6%
Central Lancashire	151,638	169,817	18,179	12.0%
Lancashire	505,224	555,871	50,647	10.0%
North West	3,067,627	3,439,100	371,473	12.1%
England	22,746,487	27,088,386	4,341,899	19.1%

Source: CLG household projections

- 4.23 Whilst the 2014-based data is the latest 'official' population projection and therefore forms the starting point for analysis of housing need in line with the PPG, it is worth testing the assumptions underpinning the projection to see if it broadly reasonable in the local context – this involves considering both the population projections (the SNPP from ONS) and also the way CLG have converted this data into households. The analysis below initially considers the validity of the population projections and their consistency with past trends, before moving on to consider past trend data in more detail, and also data released since the population projections were published (in particular, ONS has subsequently published new mid-year population estimates for 2015).

2014-based Subnational Population Projections (SNPP)

- 4.24 The latest SNPP were published by ONS on the 29th May 2014. They replaced the 2012-based projections. Subnational population projections provide estimates of the future population of local authorities, assuming a continuation of recent local trends in fertility, mortality and migration which are constrained to the assumptions made for the 2014-based national population projections. The new SNPP are largely based on trends in the 2009-14 period (2008-14 for international migration trends).
- 4.25 They are not forecasts and do not attempt to predict the impact that future government or local policies, changing economic circumstances or other factors might have on demographic behaviour. The primary purpose of the subnational projections is to provide an estimate of the future size and age structure of the population of local authorities in England. These are used as a common framework for informing local-level policy and planning in a number of different fields as they are produced in a consistent way.

Overall Population Growth

- 4.26 The table below shows the projected population growth from 2014 to 2034 in each of the three local authorities and a range of comparator areas. The data shows that the population of Central Lancashire is projected to grow by around 25,200 people (a 7% increase) which is the same as that projected across the North West but some way below the figure for England (14%). Population growth is expected to be strongest in Chorley and very modest in Preston and South Ribble.

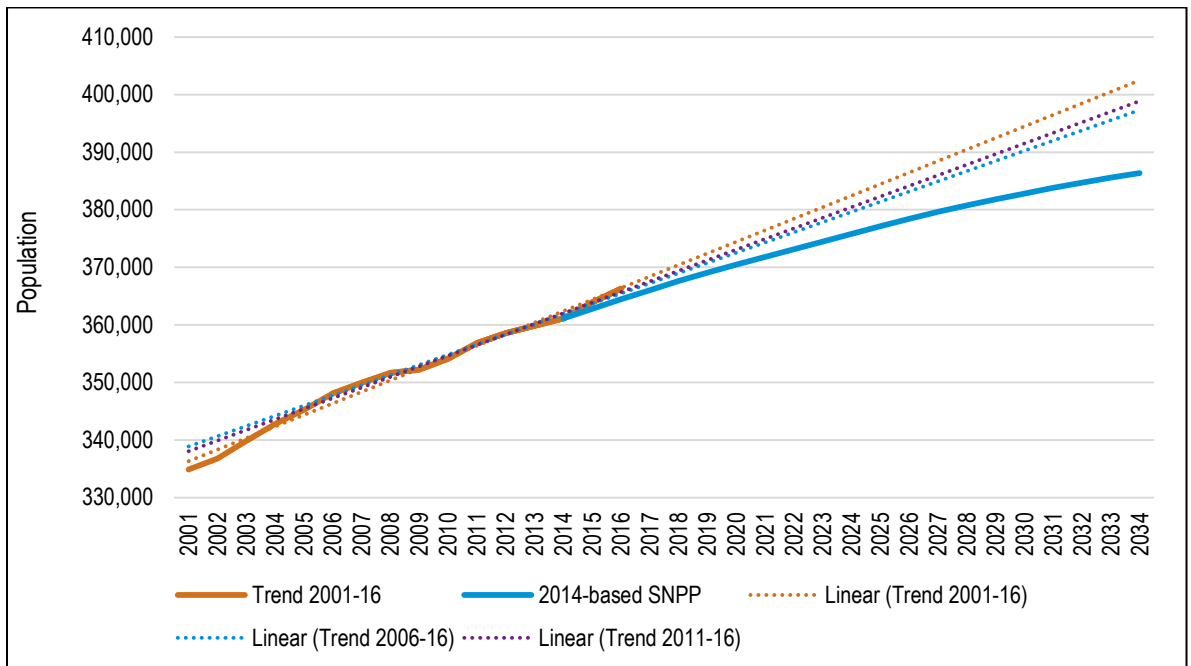
Table 15: Projected population growth (2014-2034) – 2014-based SNPP

Area	Population 2014	Population 2034	Change in population	% change
Chorley	111,607	129,360	17,753	15.9%
Preston	140,452	144,760	4,308	3.1%
South Ribble	109,077	112,243	3,166	2.9%
Central Lancashire	361,136	386,363	25,227	7.0%
Lancashire	1,184,735	1,245,964	61,229	5.2%
North West	7,132,991	7,630,064	497,073	7.0%
England	54,316,618	61,800,146	7,483,528	13.8%

Source: ONS and demographic projections

4.27 The figure below shows past and projected population growth for the period from 2001 to 2034. The data also plots a linear trend line for the last five years for which data is available (2011-16) and also longer-term periods from 2006 to 2016 (a 10-year trend) and 2001-16 (15-years). The 2001-16 period is the longest for which reasonable data about the components of population change (e.g. migration) is available. The data shows that the population is projected to grow at a rate which is some way below past trends; regardless of the period being studied.

Figure 26: Past and projected population growth – 2014-based SNPP – Central Lancashire



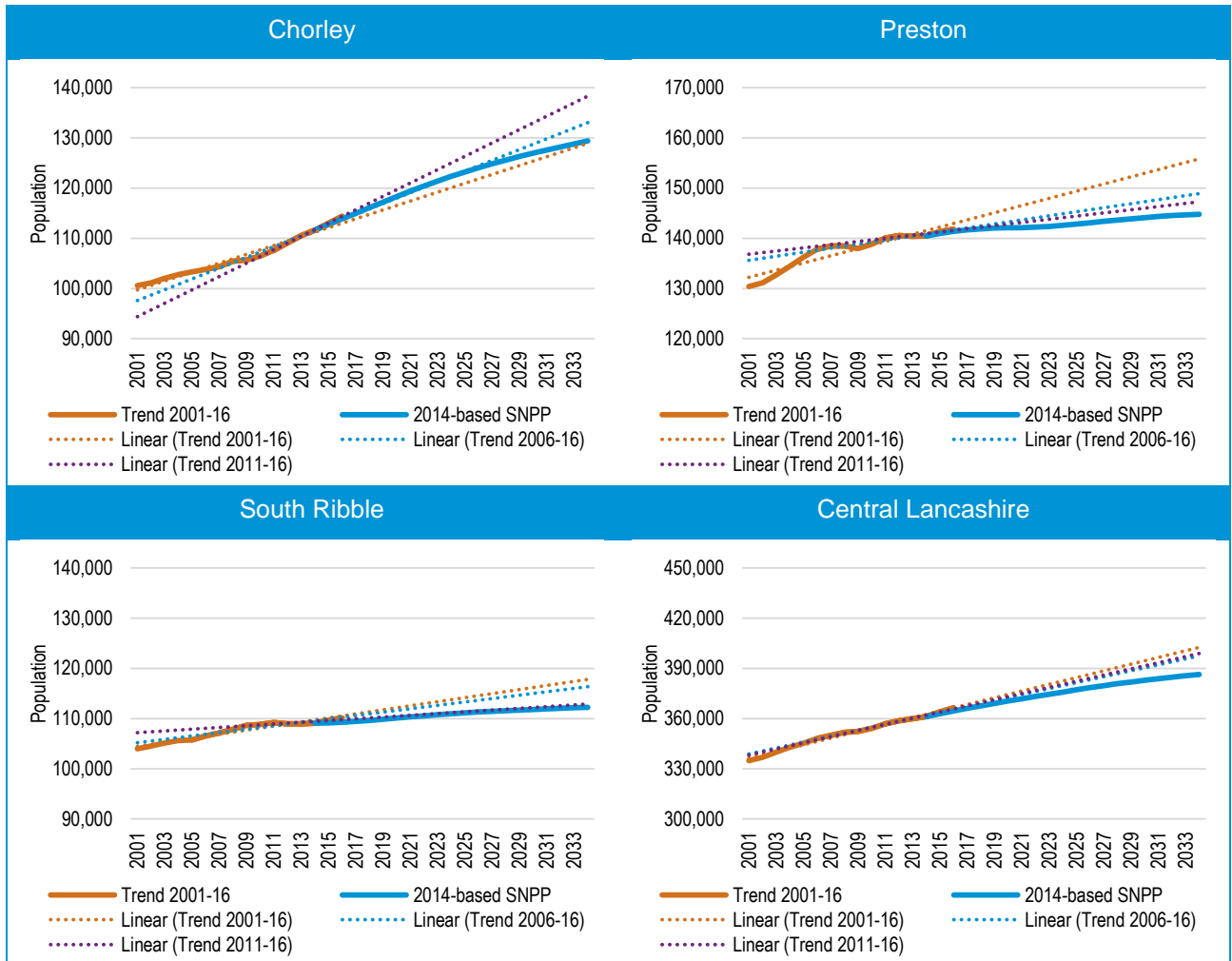
Source: ONS

4.28 Figure 27 shows the same data for the individual local authorities in Central Lancashire. In Chorley, the population is projected to grow in the SNPP at a rate that is in-line with long-term trends (over the past 10- or 15-years) but at a level which is some way below that observed over the past 5-years. In Preston, projected population growth is lower than any of the past trend periods; whilst in South Ribble the projection is in-line with trends seen over the past five years, but some way below

longer-term trends. It is notable in Chorley that housing growth has been above target. This has been influenced by the delivery of larger development sites such as Buckshaw Village.

4.29 Overall, when observing the trend based projections it seems that the SNPP is relatively low in comparison to both the short term and future trends, however, the SNPP methodology is complex and it is difficult to fully test the validity of the SNPP from this analysis alone.

Figure 27: Past and projected population growth – 2014-based SNPP – individual local authorities



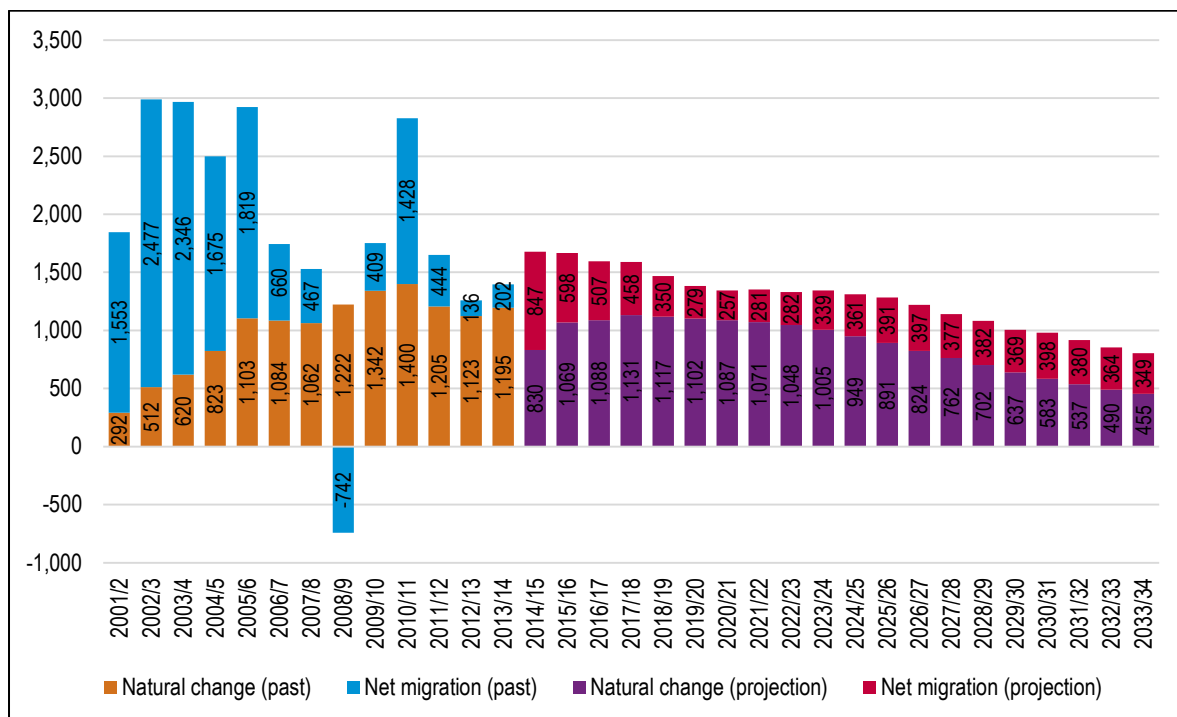
Source: ONS and demographic projections

Components of population change

4.30 The figure below brings together data about migration (both past trends and the future projection) along with information about natural change. This shows that natural change is expected to decrease over time, whilst migration is also on a downward trend. Equivalent figures for each local authority can be found in Appendix A; these show that all areas are projected to see a decrease in natural change; whilst the pattern with net migration is mixed. In particular, migration decreases over time in Chorley, while increases in South Ribble and fluctuates in Preston. Changes to

migration will be influenced by the age structure of the population and how this structure changes over time.

Figure 28: Components of population change, mid-2001 to mid-2034 (summary chart) – Central Lancashire



Source: ONS and demographic projections

4.31 Table 16 brings together a series of average net migration levels in both past trends and the projection (a range of different time periods are analysed). Focussing on the HMA it can be seen that projected net migration is lower than the migration of past trends and becomes lower as the projection develops influenced by age structure changes. However, the data does suggest a declining level of migration over time in the past and so the future projection is just continuing this trend. Overall, on this basis it could be argued that the SNPP is a sound trend-based projection. However, the lower projected levels of migration (when compared with past trends) are worth investigating further.

4.32 It should be noted that the data in the table below looks at trends to 2014; this is due to this being the latest period for which data was available when the SNPP was published. ONS has now published mid-year population estimates for 2015 and 2016 which are included in analysis to follow (and were also included in the trend analysis previously presented).

Table 16: Average net migration in a range of past and projected time periods (annual averages)

	Chorley	Preston	South Ribble	Central Lancashire
Past 13-years (2001-14)	619	154	217	990
Past 10-years (2004-14)	613	-97	134	650
Past 5-years (2009-14)	950	-262	-164	524
Next 5-years (2014-19)	906	-329	-25	552
Next 10-years (2014-24)	855	-443	8	420
Next 13-years (2014-27)	819	-421	14	411
Next 20-years (2014-34)	762	-406	42	398

Source: ONS

Age Structure Changes

- 4.33 With growth in the population will also come age structure changes. The table below summarise the findings for key (15-year) age groups in the 2014-based SNPP. The data shows that largest growth will be in the number of people aged 60 and over; it is estimated that there will be 115,200 people aged 60 and over in 2034 – this is an increase of 32,200 from 2014, representing growth of 39%. The population aged 75 and over is projected to increase by an even greater proportion, 72%. Looking at the other end of the age spectrum the data shows that there is projected to be modest growth in the population aged under 30 along with a decline in the number of people aged 30-59.

Table 17: Population change 2014 to 2034 by fifteen-year age bands (2014-based SNPP) – Central Lancashire

Age group	Population 2014	Population 2034	Change in population	% change from 2014
Under 15	63,356	64,799	1,443	2.3%
15-29	71,951	73,001	1,050	1.5%
30-44	69,300	67,958	-1,342	-1.9%
45-59	73,518	65,375	-8,143	-11.1%
60-74	55,507	67,931	12,424	22.4%
75+	27,504	47,300	19,796	72.0%
Total	361,136	386,363	25,227	7.0%

Source: ONS and demographic projections

- 4.34 Tables in Appendix 1 show the same information for each of the individual local authority areas. In all cases there is a notable increase in the number of people aged 60 and over. However, there are differences, with Chorley showing some notable growth in age groups up to 44, whilst both Preston and South Ribble are projected to see population decline in all age groups up to age 59 in the SNPP projections.

Alternative Demographic Scenarios

4.35 As noted above, the SNPP looks to be a sound projection with regard to population growth in the HMA from a technical perspective. However, it is noted that levels of migration and population growth have been variable over time. On this basis it would be reasonable to consider alternative scenarios through sensitivity testing – such an approach is set out in para 2a-017 of the PPG which states *'plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections...'*

4.36 The sensitivity scenarios take account of longer-term migration trends and also the 'unattributable' component of population change within ONS population data for the 2001-11 period. Additionally, data from the ONS 2015 and 2016 mid-year population estimates (MYE) is considered. The analysis below therefore considers three potential sensitivities to the figures. These can be described as:

- Implications 2015 and 2016 mid-year population data – 2014-based SNPP (+MYE)
- Implications of 10-year migration trends– 10-year migration
- Implications of 15-year migration trends– 15-year migration

2014-based SNPP (+MYE)

4.37 This projection takes assumptions from the 2014-based SNPP, but overwrites the population projection figures for 2015 and 2016 by those in the ONS MYE (by age and sex). Moving forward from 2016, this sensitivity uses the same birth and death rates as contained in the 2014-based SNPP and the actual projected migration figures (by age and sex). Due to age structure differences in the MYE compared to the projection, this means that population growth from 2016 onwards does not exactly match that in the actual projections as published. This projection effectively 'rebases' the SNPP using the latest published data.

10-year migration and 15-year migration

4.38 This projection uses information about migration levels in the 10- and 15-year period to 2016 (i.e. 2006-16 and 2001-16) and therefore includes the most up-to-date MYE figures (for 2016). The projection does not just look at the migration figures and roll these forward but recognises that migration can be variable over time as the age structure changes. With international migration, this projection also takes account of the fact that ONS are projecting for international net migration to decrease in the longer-term.

4.39 To overcome the issue of variable migration, the methodology employed looks at the share of migration in each local authority compared to the share in the period feeding into the 2014-based SNPP (which is 2009-14 for internal migration and 2008-14 for international migration). Where the share of migration is higher in the 10/15-year period, the projection applies an upward adjustment to migration, and vice versa. This approach is often called a 'rates based' approach.

Migration Assumptions in the Alternative Demographic Projections

4.40 Table 18 presents the modelled assumptions which are shown as average figures for the 2014-34 projection period. These figures are presented as net migration although the modelling itself looks separately at in- and out-migration (for each of internal and international migration). The estimate of net migration linked to 10-year trends is slightly higher than in the 2014-based SNPP; with 15-year trends being notably higher. The longer-term (15-year) trends typically show higher migration in Preston and South Ribble but a lower average in Chorley.

Table 18: Average net migration assumptions used in demographic modelling (per annum 2014-34)

		2014-based SNPP	2014-based SNPP (+MYE)	10-year migration	15-year migration
Chorley	Internal migration	683	700	544	486
	International migration	79	77	65	51
	Total net migration	762	777	610	537
Preston	Internal migration	-839	-834	-1,029	-622
	International migration	432	434	458	511
	Total net migration	-406	-400	-571	-111
South Ribble	Internal migration	-13	25	294	406
	International migration	56	51	32	21
	Total net migration	42	76	325	427
Central Lancashire	Internal migration	-169	-109	-191	269
	International migration	567	562	555	583
	Total net migration	398	453	364	852

Source: Demographic analysis based on ONS data

Outputs from different demographic projections

4.41 Table 19 shows the estimated level of population growth in the SNPP and the alternative projections which were developed. Across the HMA, the SNPP shows a population growth (2014-34) of 7.0%. This figure increases slightly when more recent population and migration data is included in the modelling (i.e. to include 2015-16 MYE data). When looking at 10-year trends the projected population growth increases slightly (to 6.8%) and increases further (to 10.2%) when considering the trends back to 2001.

Table 19: Projected population growth (2014-2034) – alternative scenarios – Central Lancashire

	Population 2014	Population 2034	Change in population	% change
2014-based SNPP	361,136	386,363	25,227	7.0%
2014-based SNPP (+MYE)	361,136	387,986	26,850	7.4%
10-year migration	361,136	385,813	24,677	6.8%
15-year migration	361,136	397,832	36,696	10.2%

Source: Demographic projections

4.42 Tables 20-22 show the same range of scenarios for each of the local authorities. For all areas other than Chorley the highest level of population growth is seen in the scenario linked to 15-year migration trends.

Table 20: Projected population growth (2014-2034) – alternative scenarios – Chorley

	Population 2014	Population 2034	Change in population	% change
2014-based SNPP	111,607	129,360	17,753	15.9%
2014-based SNPP (+MYE)	111,607	129,821	18,214	16.3%
10-year migration	111,607	126,017	14,410	12.9%
15-year migration	111,607	124,350	12,743	11.4%

Source: Demographic projections

Table 21: Projected population growth (2014-2034) – alternative scenarios – Preston

	Population 2014	Population 2034	Change in population	% change
2014-based SNPP	140,452	144,760	4,308	3.1%
2014-based SNPP (+MYE)	140,452	145,059	4,607	3.3%
10-year migration	140,452	140,940	488	0.3%
15-year migration	140,452	152,291	11,839	8.4%

Source: Demographic projections

Table 22: Projected population growth (2014-2034) – alternative scenarios – South Ribble

	Population 2014	Population 2034	Change in population	% change
2014-based SNPP	109,077	112,243	3,166	2.9%
2014-based SNPP (+MYE)	109,077	113,106	4,029	3.7%
10-year migration	109,077	118,856	9,779	9.0%
15-year migration	109,077	121,191	12,114	11.1%

Source: Demographic projections

Reviewing the Population Growth Scenarios

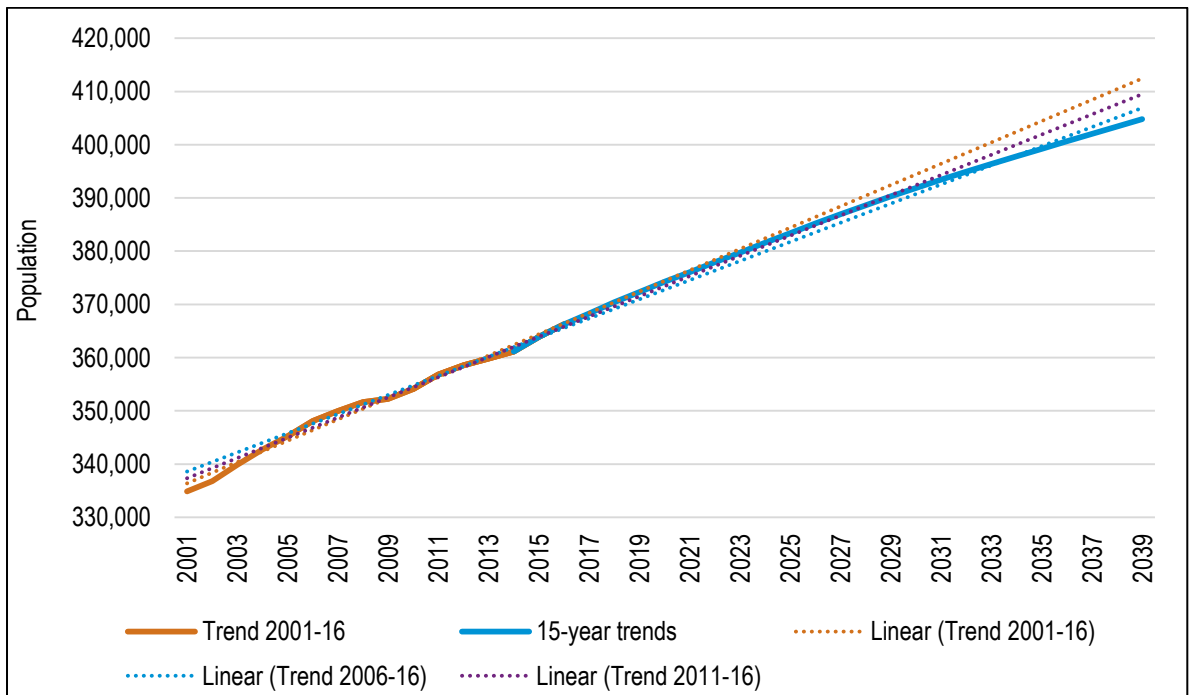
4.43 Having developed a range of scenarios, it is worth briefly considering which are the most appropriate to use when taking the data forward into estimates of housing need. The 2014-based SNPP is the only projection that is directly linked to the official projections and should therefore be

given some credence. It is also the projection which is identified in the PPG as the starting point for the analysis of housing need.

4.44 The projections linked to longer-term migration trends should be given some weight. As the analysis of housing need has developed over time, it has become common practice to consider 10-year trends as well as the most recent official projections. Given that in Central Lancashire there does appear to have been some short-term reduction in migration it is considered that a longer-term projection would be a useful scenario to use when looking at housing need.

4.45 However, the past 10-years show a very modest population growth and migration in Preston. Thus looking further back in time should also be considered. The 15-year trend projection covers a longer period of time and also includes a similar amount of data from pre- and post-recession periods (i.e. the 7/8 year periods either side of 2008). This longer period might be described as being more 'stable'. Figure 29 shows that the use of 15-year trends generates a level of population growth which is more in-line with past trends; the SNPP showing growth some way below the trend position.

Figure 29: Past and projected population growth – 15-year trends – Central Lancashire



Source: ONS and demographic projections

Age Structure Changes in the 15 Year Migration Scenario

4.46 Analysis has previously shown changes in the age structure when using the 2014-based SNPP. A similar analysis has been carried out with the 15-year migration trend projection to assess the potential impact of alternative population projection assumptions on changes in the population structure. Similar to the SNPP, there is projected to be a notable ageing of the population; however, it is also noteworthy that the higher population growth in this scenario is concentrated in younger

age groups. This reflects the fact that young people (particularly of working-age) migrate more than the older population.

Table 23: Population change 2014 to 2034 by fifteen-year age bands (15-year migration trends) – Central Lancashire

Age group	Population 2014	Population 2034	Change in population	% change from 2014
Under 15	63,356	67,220	3,864	6.1%
15-29	71,951	75,694	3,743	5.2%
30-44	69,300	70,937	1,637	2.4%
45-59	73,518	66,925	-6,593	-9.0%
60-74	55,507	69,218	13,711	24.7%
75+	27,504	47,838	20,334	73.9%
Total	361,136	397,832	36,696	10.2%

Source: ONS and demographic projections

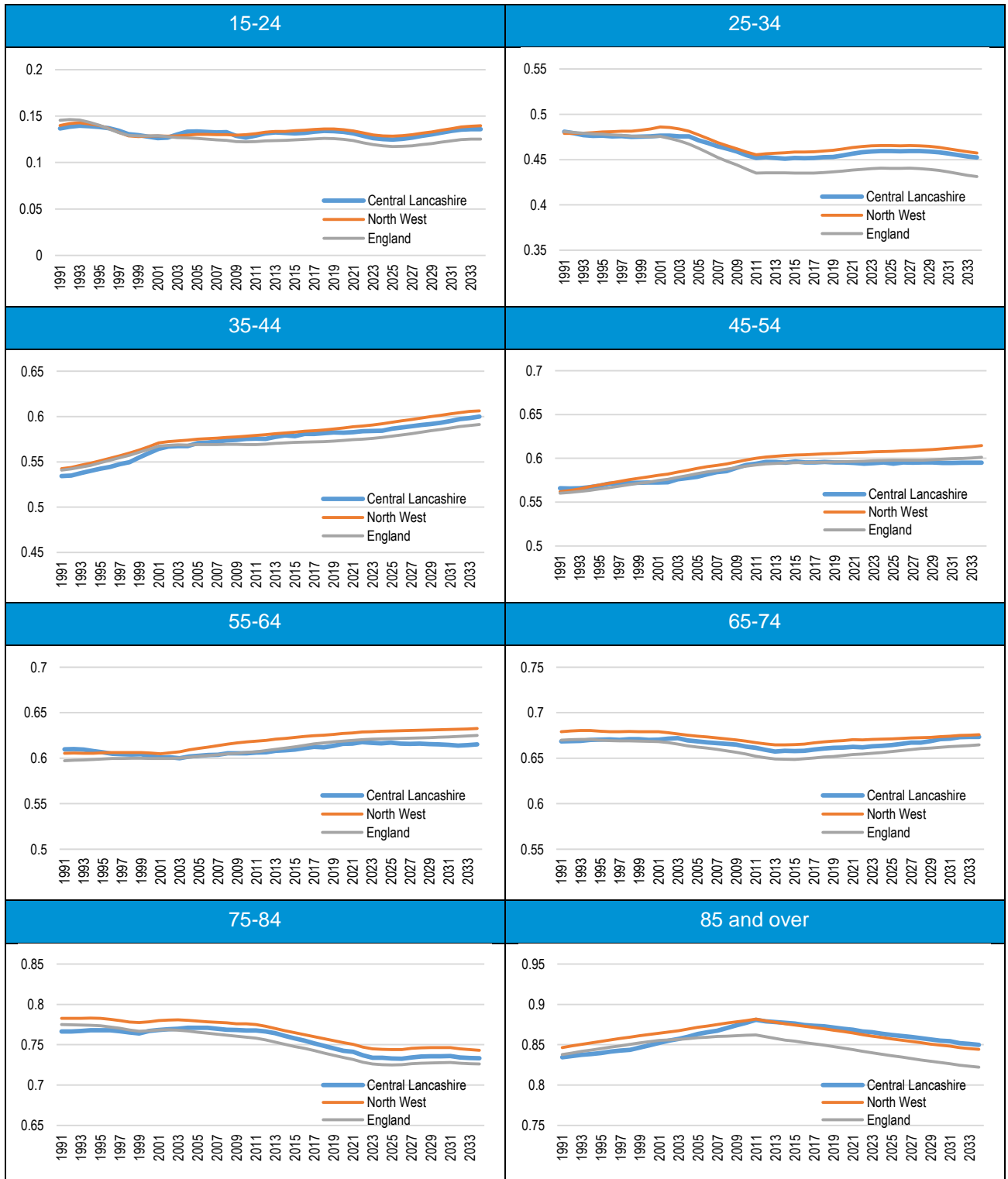
Household Formation (Headship) Rates

- 4.47 Having studied the population size and the age/sex profile of the population the next step in the process is to convert this information into estimates of the number of households in the area. To do this the concept of headship rates is used. Headship rates can be described in their most simple terms as the number of people who are counted as heads of households (or in this case the more widely used Household Reference Person (HRP)).
- 4.48 On the 12th June 2016, CLG published a new set of (2014-based) household projections – the projections contain two core analyses. The Stage 1 household projections project household formation based on data from the 1971, 1981, 1991, 2001 and 2011 Censuses with outputs for age, sex and marital status. For younger age groups greater weight was given in the CLG projections methodology to the dampened logistical trend than the simple logistics trend; the effect of which is to give greater weight to the shorter-term trends.
- 4.49 The Stage 2 household projections consider household types and the methodology report accompanying the projections is clear that these projections are based on just two data points – from the 2001 and 2011 Census. Overall outputs on total household growth are constrained to the totals from the Stage 1 Projections. This means that both sets of projections show the same level of overall household growth (when set against the last set of SNPP) but some of the age specific assumptions differ. Differences can however occur between the Stage 1 and 2 headship rates when modelled against different population projections (due to differences in the age structure).
- 4.50 Overall, it is considered that the Stage 1 projections should be favoured over the Stage 2 figures for the purposes of considering overall household growth; this is for two key reasons: a) the Stage 1 figures are based on a long-term time series (dating back to 1971 and using 5 Census data points) whereas the Stage 2 figures only look at two data points (2001 and 2011) and b) the Stage 2

figures are constrained back to Stage 1 values, essentially meaning that it is the Stage 1 figures that drive overall estimates of household growth in the CLG household projections themselves. The analysis to follow therefore focuses on Stage 1 figures.

- 4.51 Figure 30 shows how Stage 1 figures differ for different age groups. It is evident from the analysis that household formation amongst households in their late 20s and early 30s fell slightly over the 2001-11 decade. The projections are however showing that there will not be any further reduction and project relatively stable household formation amongst these age groups. Short-term increases in headship rates are shown through to the mid 2020s. Increasing headship rates amongst the 35-44 age group are shown.

Figure 30: Projected household formation rates by age of head of household – Central Lancashire



Source: Derived from CLG data

4.52 The 2014-based household projections also expect household formation rates amongst older age groups to fall over time. Given improving life expectancy this ‘trend’ looks to be reasonable (as it would be expected that more people would remain living as couples).

- 4.53 Figure 30 shows a comparison between Central Lancashire, the North West region and England. Generally, figures in Central Lancashire are at similar levels and with similar changes to equivalent data in other areas. This comparison does not suggest there is anything within the 2014-based CLG household formation rates which is particularly unusual or concerning. Appendix A contains the same information for local authorities – this tends to be broadly consistent with data as observed across the HMA.

Critical Review of Headship Rates

- 4.54 The headship rates in the 2014-based CLG household projections should not be used uncritically. Paragraph 2a-015 of the PPG is clear that the *'household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends'*. Essentially this is suggesting, where the projections include a suppression of household formation, such as where household formation amongst younger households is expected to drop, that some sort of adjustment should be made.
- 4.55 It is not straightforward to determine if the projections contain any level of suppression (either in the past or projected forward) given that household formation rates can be influenced by a range of factors. One person to recognise this was the late Alan Holmans in the September 2013 Town and Country Planning Association (TCPA) publication *'new estimates of housing demand and need in England, 2011 to 2031'* where he stated:

'The working assumption in this study is that a considerable part but not all of the 375,000 shortfall of households relative to trend was due to the state of the economy and the housing market. 200,000 is attributed to over-projection of households due to the much larger proportion of recent immigrants in the population, whose household formation rates are lower than for the population as a whole. This effect will not be reversed. The other 175,000 is attributed to the economy and the state of the housing market and is assumed to gradually reverse.'

- 4.56 Broadly what Dr Holmans was saying is that about half of changes to household formation are due to market factors and about half due to international migration. Whilst the international migration impact is not expected to change, any suppression as a result of the economy and housing market could improve in the future.
- 4.57 When looking specifically at data for Central Lancashire, it is clear that the only age group where there has been a recent fall in household formation is the 25-34. There is a downward trend in the headship rates of this group from 2001-11 although moving forward from 2011, the rate remains fairly flat. It is not clear if the historical changes in the rates are due to market factors or international migration, but it is clear that this is not projected forwards.
- 4.58 The analysis below seeks to understand the impact which international migration could have had on household formation rates. At a local level it is difficult to use international migration figures because of the way such migration works – typically most international migrants start in a major city and then filter out into other areas (and hence are registered by ONS as an internal migrant). Hence

one way at looking at international migration is to consider changes to the Black and Minority Ethnic (BME) population. BME populations tend to have different household structures (typically larger households) as identified by Dr Holmans.

- 4.59 The table below shows changes to the BME population in each of the age groups for which headship rate data is provided above (data for the White (British/Irish) population is also provided) with equivalent local authority data to be found in Appendix A. This analysis shows an increase in the BME population of 12,400 people aged 15 and over in the 10-year period – a 65% increase. Some 34% (4,229 people) of this increase was in the age group 25-34. In contrast, the White (British/Irish) population aged 25-34 fell by over 6,200 people.

Table 24: Changes to Black and Minority Ethnic and White (British/Irish) Population by age (2001-11) – Central Lancashire

	Black and Minority Ethnic			White (British/Irish)		
	Population 2001	Population 2011	Change	Population 2001	Population 2011	Change
15-24	4,867	7,483	2,616	37,256	42,113	4,857
25-34	4,640	8,869	4,229	42,301	36,092	-6,209
35-44	3,650	6,419	2,769	46,459	44,179	-2,280
45-54	2,583	4,035	1,452	43,355	45,745	2,390
55-64	1,532	2,397	865	34,514	40,446	5,932
65-74	1,162	1,217	55	25,671	29,780	4,109
75-84	426	752	326	16,578	17,807	1,229
85+	97	172	75	5,445	6,892	1,447
TOTAL	18,957	31,344	12,387	251,579	263,054	11,475

Source: Census (2001 and 2011)

- 4.60 From this it is clear that a major part of the changes in the headship rates of the 25-34 age group is likely to be due to international migration and growth in BME communities. Given that moving forward from 2011 the projections are expecting headship rates in this age group to stabilise; there is no suggestion of any suppression being built into the projections or evidential basis for their adjustment.
- 4.61 In considering trends amongst the 25-34 age group it is also useful to look at the 35-44 age group (noting that, for example, people aged 25-34 in 2011 will be aged 35-44 by 2021). The 35-44 age group shows little change in headship rates in the past and a slightly upward trend in the future. On this basis there is no significant evidence of suppression in this age group either in the past or projected forward. This analysis therefore suggests that the extent to which household formation has fallen for those in the 25-34 age group, it is expected that this will not remain as a suppressed household formation – the analysis would suggest that all of the households who might be expected to form will do so, it's just that some of this formation might be delayed (i.e. households who might historically been expected to form when aged 25-34 will now form when aged 35-44). Overall,

therefore levels of household growth will over a period of time (e.g. to 2034) fully reflect the needs of the local population with no suppression being evident in the long-term.

- 4.62 Since Holmans work was published there have been further articles on the topic of household formation rates. One of note is New Estimates of Housing Requirements in England, 2012 to 2037 (Neil McDonald and Christine Whitehead – TCPA – November 2015). In this it is stated that:

'The 2012-based projections, which use the 2011 Census and up-to-date population figures, are more immediately relevant and more strongly based than earlier estimates. The latest projections can therefore be taken as a reasonable indication of what is likely to happen to household formation rates if recent trends continue. This is because, although economic growth might be expected to increase the household formation rate, there are both longer-term structural changes and other factors still in the pipeline (such as welfare reforms) that could offset any such increase'

- 4.63 Whilst this refers to the 2012-based projections, it is the case that the household formation rates in the 2014-based figures are almost identical. Overall, on the basis of the evidence available, it seems unlikely that the 2014-based household formation rates include any degree of suppression and can therefore realistically be used to assess levels of household growth when set against population projections.

Demographic-led Housing Need

- 4.64 The tables below bring together outputs in terms of household growth and housing need using the 2014-based headship rates and the full range of scenarios developed. To convert households into dwellings the data includes an uplift to take account of vacant homes. This has been based on 2015 Council Tax data with a summary of the key statistics shown below. This shows that the total number of dwellings is some 2.9% higher than the number of occupied homes (which is taken as a proxy for households) and hence household growth figures are uplifted by around 2.9% to provide an estimate of housing need (figures are applied on a local authority basis). It is assumed that such a level of vacant homes will allow for movement within the housing stock and includes an allowance for second homes.

Table 25: Vacant Homes (Council Tax data)

	Chorley	Preston	South Ribble	Central Lancashire
Dwellings	49,130	61,261	48,625	159,016
Second Homes	139	292	95	526
Other vacant homes	1,086	1,808	1,004	3,898
Total vacant	1,225	2,100	1,099	4,424
Total occupied	47,905	59,161	47,526	154,592
Vacancy allowance	2.6%	3.5%	2.3%	2.9%

Source: CLG

- 4.65 The analysis shows an overall housing need of 934 dwellings per annum across Central Lancashire when using the 2014-based SNPP as the underlying population projection. This figure increases

slightly (to 977 dpa) when the assumptions include MYE data to 2016. Considering the 10-year migration assumptions; the housing need is increased to up to 923 dwellings per annum and this figure increases further to 1,171 when the trend base period is extended to 15-years.

- 4.66 On the basis of the information presented in Table 26 it is concluded that the demographic need for housing falls in the range of 977-1,171 dwellings per annum. The bottom end of the range being the 'starting point' as defined in the PPG (including use of the Mid-Year Estimates) and the upper end being informed by the 15-year longer-term trend scenarios. A range is shown recognising the variability in migration trends over time.

Table 26: Projected housing need – range of demographic based scenarios and 2014-based headship rates – Central Lancashire

	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
2014-based SNPP	151,638	169,814	18,176	909	934
2014-based SNPP (+MYE)	151,638	170,659	19,021	951	977
10-year migration	151,638	169,614	17,976	899	923
15-year migration	151,638	174,421	22,783	1,139	1,171

Source: Demographic projections

- 4.67 Tables 27 to 29 below show the same information for individual local authorities. On the basis of the analysis it is concluded that the demographic need for housing in each local authority falls in the range of:
- Chorley: 419-527 dwellings per annum
 - Preston: 254-402 dwellings per annum
 - South Ribble: 197-351 dwellings per annum
- 4.68 Given the migration interactions between the authorities (as shown in the Section 2 analysis), with for instance population growth in South Ribble and Chorley influenced by net out-migration from Preston, greater weight should be attached to the conclusions at an HMA level.
- 4.69 It should however be noted that it would not be appropriate to simply take the highest of the range in each local authority and use that as the demographic need figure (nor would it be reasonable to take the lowest figures). That is because the top and bottom of the range are not based on the same projection scenario in each location.
- 4.70 Given that policy requirement is to assess needs at an HMA level, any conclusions for individual local authorities should be based on a consistent set of projections. For example, if the OAN is set by reference to trends over the 15-years to 2015; then the individual local authority need would be 419 homes in Chorley, 402 in Preston and 351 in South Ribble (in this instance the figure for Chorley sits at the bottom of the range).

Table 27: Projected housing need – range of demographic based scenarios and 2014-based headship rates – Chorley

	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
2014-based SNPP	47,000	56,968	9,968	498	511
2014-based SNPP (+MYE)	47,000	57,272	10,273	514	527
10-year migration	47,000	55,792	8,792	440	451
15-year migration	47,000	55,161	8,161	408	419

Source: Demographic projections

Table 28: Projected housing need – range of demographic based scenarios and 2014-based headship rates – Preston

	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
2014-based SNPP	57,933	62,582	4,648	232	241
2014-based SNPP (+MYE)	57,933	62,834	4,901	245	254
10-year migration	57,933	61,147	3,214	161	166
15-year migration	57,933	65,695	7,762	388	402

Source: Demographic projections

Table 29: Projected housing need – range of demographic based scenarios and 2014-based headship rates – South Ribble

	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
2014-based SNPP	46,705	50,265	3,560	178	182
2014-based SNPP (+MYE)	46,705	50,553	3,848	192	197
10-year migration	46,705	52,675	5,970	298	305
15-year migration	46,705	53,564	6,859	343	351

Source: Demographic projections

Trend-Based Demographic Projections: Key Messages

- The starting point for assessing housing need in line with the PPG is the most recent official household projections; these are the 2014-based CLG projections which suggest a need for around 934 dwellings per annum across the HMA (2014-34). These projections were underpinned by the most recent ONS subnational population projections (SNPP – also 2014-based).
- The PPG also advocates the use of the most up-to-date information when assessing housing need. We have therefore incorporated the latest mid-year population estimates for 2015 and 2016. Using this data increases the housing need to 977 dwellings per annum to be provided (2014-34).
- Alternative projections based on longer-term trends were developed (and this also includes the mid-year population estimates to 2016). These projections suggest a higher level of future population growth and are considered to be reasonable scenarios to use when considering demographic needs.
- Projecting migration based on trends over the 15-year period from 2001-16 for instance sees population growth to be about 45% higher than the most recent 'official' population projections. The housing need linked to the 15-year migration trend scenarios is for 1,171 dwellings per annum (2014-34). Other sensitivity scenarios which were developed (based on 10-year trends) tend to show levels of housing need closer to those in the 2014-based projections.
- When looking at the data about headship rates underpinning the 2014-based CLG household projections it was observed that the 25-34 age group had reduced slightly in the 2001-11 period, although this trend was not projected to continue into the future. When considering changes to the population structure in this age group (growth in BME communities) and other age groups within the projections (e.g. projected increases in headship for those aged 35-44) there was no evidence of any suppression of household formation and thus the 2014-based CLG projections can readily be used as published to translate population figures into household growth and housing need.
- Overall, the analysis concludes that the demographic based need for housing galls between 977 - 1,171 dwellings per annum across the Central Lancs HMA.

5 ECONOMIC-LED HOUSING NEEDS

- 5.1 Planning Practice Guidance sets out that consideration should be given to future economic performance in drawing conclusions on the overall need for housing. Where the evidence suggests that higher migration might be needed to support economic growth, consideration should be given to adjusting the assessed housing need. Specifically, the Guidance outlines that:

'Plan makers should make an assessment of the likely growth in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area. Any cross-boundary migration assumptions, particularly where one area decides to assume a lower internal migration figure than the housing market area figures suggest, will need to be agreed with the other relevant local planning authority under the duty to cooperate. Failure to do so will mean that there would be an increase in unmet housing need.'

And that:

'Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems'

- 5.2 The actual wording of the PPG needs to be carefully considered. It is clear that understanding the link between jobs and population/housing is an important part of looking at the OAN, however, the PPG is clear that this issue is one in relation to the location of housing rather than overall housing numbers per se. Indeed, the wording of the PPG shows a notable departure from the wording in the draft PPG (of August 2013) where it was stated that *'in such circumstances [a shortfall in labour supply], plan makers will need to consider increasing their housing numbers to address these problems'*.
- 5.3 This is a clear, conscious and logical change to the PPG between draft and final version. Clearly it would be illogical for an area to increase population growth above the levels shown in trend-based projections (and hence increase housing need) without consideration of the impact this would have on other locations – i.e. given that there is a finite level of population growth projected nationally (as informed by national population projections) any increase in one area would need to come with a commensurate decrease in other locations. This is particularly relevant within a common HMA which covers a number of local authorities.
- 5.4 Despite the entirely logical wording in the PPG it is the case that a number of areas have sought to show a higher need linked to job growth than in trend-based projections; and this has often been done without consideration of the impact in other locations. Such an approach has been accepted by inspectors in some instances with the PAS Technical Advice Note (para 8.2) noting for example that *'planning inspectors have interpreted this [the PPG] to mean that demographic projections should be tested against future jobs, to see if housing supply in line with the projections would be*

enough to support those future jobs. If that is not the case, the demographically projected need should be adjusted upwards accordingly.'

- 5.5 To be clear, it appears from the PPG that the jobs/housing link is very much in relation to the locations of housing rather than the overall OAN. This position has support in the NPPF which in para 159 (bullet 1) states that the SHMA should 'identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which: - meets household and population projections, taking account of migration and demographic change' [emphasis added].
- 5.6 Hence it is considered that any upward (or indeed downward) adjustment to the OAN as a result of job growth will need to be undertaken alongside an analysis of where the additional population will come from (or go to) and therefore consider proportionate adjustments to the need in other locations.
- 5.7 It is however recognised that the NPPF seeks to 'boost significantly the supply of housing' (para 47) and this is often used to support the 'need' for an uplift to housing numbers (often expressed as the OAN). This point does not seem right; the NPPF is clear of the need to boost housing supply, and such a boost is in relation to the low levels of delivery seen in the recent past – over the past 10-years (to 2015) the number of completions (in England) averaged about 130,000 per annum. This figure can be compared in light of the most recent (2014-based) CLG household projections which show household growth of about 210,000 per annum (2014-39) which once account is taken of vacant homes would arguably rise to approaching 220,000. Hence the 'boost' sought in the NPPF (and PPG) is to increase *delivery* to the sort of levels required by the growing population.
- 5.8 If every local authority planned (and delivered) on the basis of official projections, then the national OAN would be met; regardless of any consideration of the jobs/homes balance. It would still be the case that a number of authorities would be unable to meet their OAN (due to constraints); however, this is an issue to be dealt with through the Duty-to-Cooperate and not one of OAN.
- 5.9 Nonetheless an understanding of the jobs/homes link is important. This will particularly be in areas where the evidence shows strong demographic growth (and weaker job growth) in one location and weak demographic growth (but strong job growth) in another. In such circumstances, 2a-018 of the PPG is logically used to consider the *location* of new housing or indeed the location of jobs,; ensuring that the OAN is met across the Housing Market Area.
- 5.10 It is also considered that there are some circumstances where an individual authority might consider a higher OAN due to job growth. A couple of examples are provided below:
- a) In an area with low future population growth and potentially a minimal change in the economically active population (due to an ageing population). In such circumstances it may be sensible to suggest an above trend level of housing delivery to encourage a slightly younger age structure and to support economic growth.
 - b) In an area with a known 'shock' to the employment base such as a major new employment site which will generate many more jobs above a baseline forecast position. In such a case it may

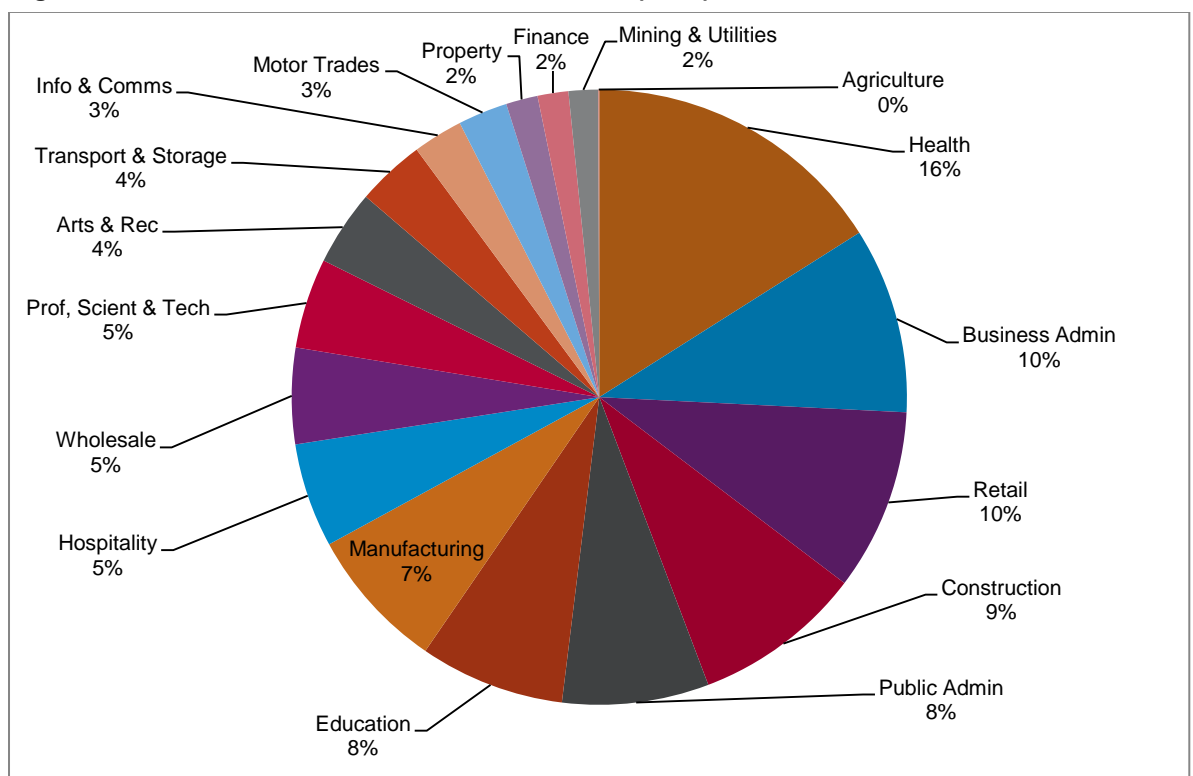
be reasonable to consider that more homes will be needed to accommodate the growing workforce (although recognising commuting patterns and the 'draw' of workers will also be important along with an understanding of the displacement impacts of sizeable development)

- 5.11 In such circumstances an 'economic-based' approach to looking at housing need may be appropriate. However, it would still be the case that any uplift would need to be considered in the light of the impact in other areas; for example, if an economic-based approach suggests an increase in population (and related housing need) of 2,000 people (over and above the levels in trend-based demographic projections) then some consideration of where the additional population will come from will be necessary, and assumptions about growth be agreed with the relevant authorities through the plan making process. Of course an opposing set of scenarios might also arise pointing towards the lowering of housing need (i.e. strong population growth relative to likely job increases or known future job losses). This is again something that should be considered when looking at housing need in the round.
- 5.12 There is also an issue of scale to be considered when looking at moving away from trend-based demographic projections. For example, a 20% uplift to housing need may be realistic and potentially deliverable (depending on local circumstances) but increases of say 50%+ may not be. To some extent this will be a matter of judgement although the PPG is clear [2a-003] that '*Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur*'.
- 5.13 Finally, the general issue of the link between jobs and population/housing is complicated by the number of assumptions that need to be made to understand this link. This will include the assumptions to be made about commuting and double jobbing (the proportion of people with more than one job). However, this biggest issue is about assumptions with regard to how employment or economic activity rates might change in the future. A range of different assumptions are available and these can show radically different outputs (these approaches are discussed in more detail later in this section).
- 5.14 Overall, whilst it is possible to use job growth as a way of considering the OAN, this should be treated with a degree of caution not least given the inherent uncertainties associated with predicting economic performance, employment growth and changes in economic participation over the longer-term. If an increase in housing need is suggested, then this will need to be supported by an understanding of the impact in other areas; any increase will need to be based on robust and locally specific assumptions (so far as this is possible) and the outputs of modelling should be proportionate and reflect a scenario that could reasonably be expected to occur. The link between jobs and homes is essentially really rather complex and therefore to some extent and modelled outputs can only be considered as indicative. In particular caution should be applied in interpreting findings at a local authority level, with greater weight given to conclusions and balancing homes and jobs across the functional HMA geography, this being broadly consistent with the labour market geography shown through ONS Travel to Work Areas.

Current Economic Context

- 5.15 The Business Register and Employment Survey (BRES) has been used initially to review economic performance across Central Lancashire. The figure below presents the sectoral structure in total employment terms for 2014. There were 177,000 jobs recorded by BRES in 2014.¹⁰
- 5.16 Preston is the largest employment centre in the HMA supporting over 82,000 jobs. South Ribble is the next largest with 54,000 jobs and Chorley supports just over 40,000 jobs.
- 5.17 Healthcare and Social care dominates the current sectoral breakdown with more than 28,000 jobs (16%) in the sector. Other large sectors include Business Administration (10%), Retail (10%), Construction (9%), Public Sector (8%), Education (8%) and Manufacturing (7%) each of which employ over 13,000 people.

Figure 31: Central Lancashire Sectoral Structure (2014)

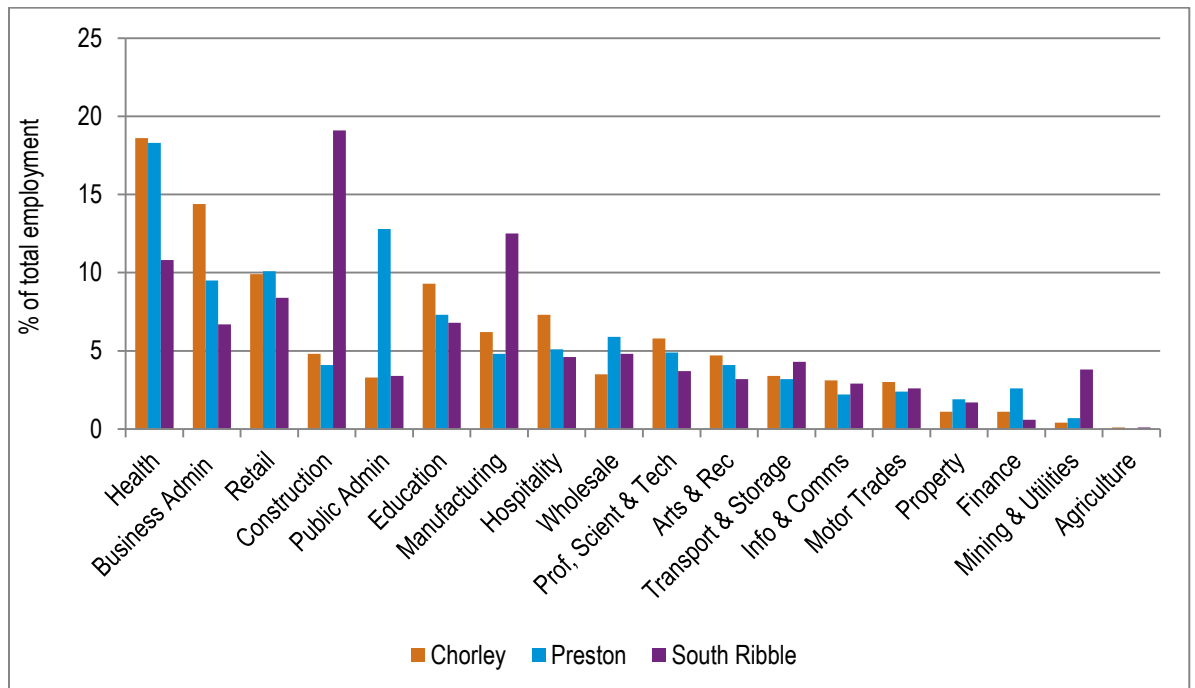


Source: BRES 2014

- 5.18 Each local authority has a slightly different sector breakdown. Both Preston and Chorley have significant employment in health and social care. South Ribble however has much higher employment in Construction and Manufacturing sectors.

¹⁰ Note, BRES data does not fully capture self-employment

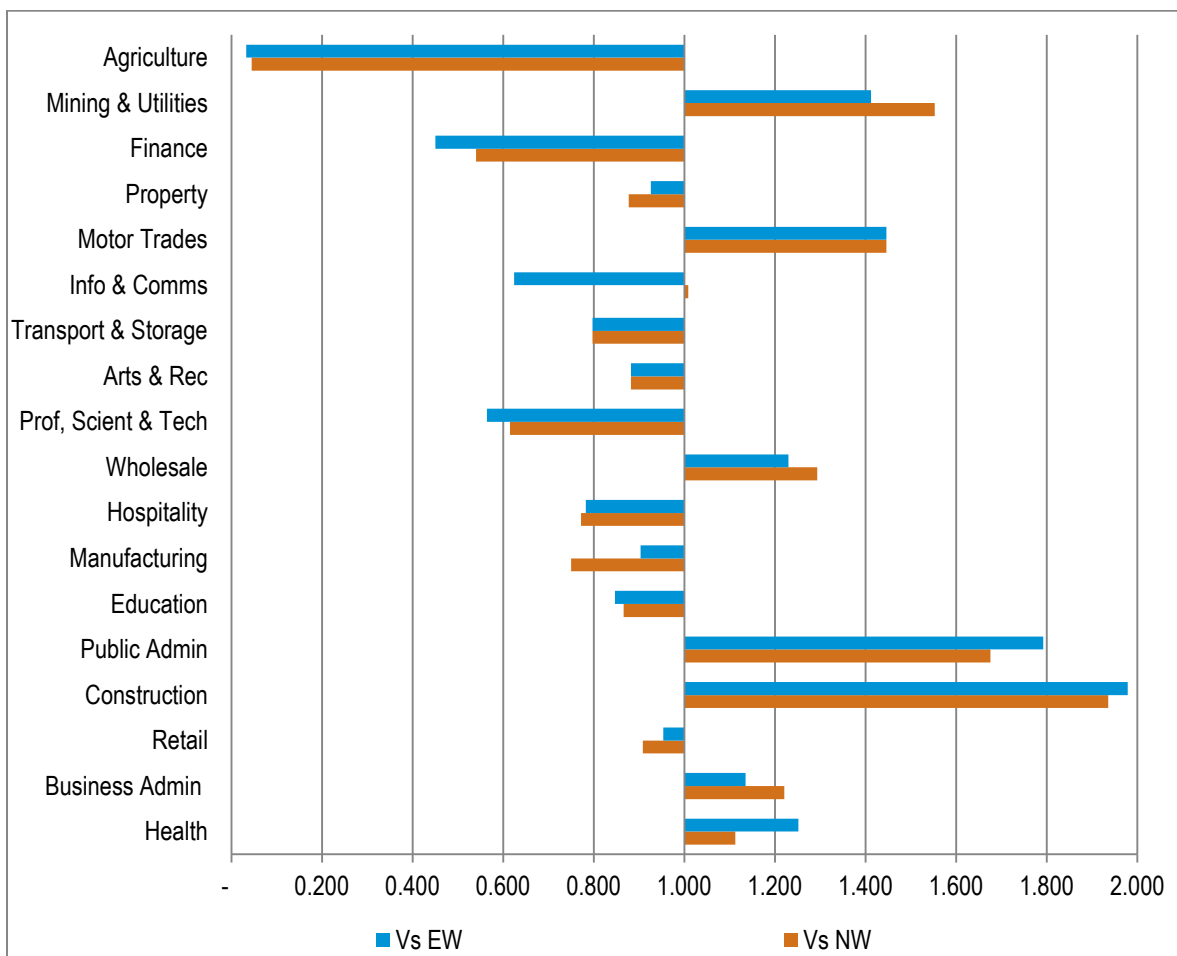
Figure 32: Local Authority Sectoral Structure (2014)



Source: BRES 2014

- 5.19 As the home of the County Council and the Fire and Rescue Service, Preston has a much higher percentage of employees in the Public admin and defence sector. Chorley has a much higher concentration of employment in Business Admin and to a lesser extent in Education.
- 5.20 By analysing the current sector strengths against wider comparators such as the North West and UK, Figure 33 below it allows plan makers to identify the local economy’s sectors of relative strengths and weaknesses.

Figure 33: Location Quotient of Sectors across HMA (2014)



Source: BRES 2014

5.21 The Location Quotient analysis presented in the figure above identifies a strong representation of employment in the HMA against the wider comparators in the construction, public admin & defence, mining & utilities and motor trades sectors and to a lesser extent the business administration and health & social care sectors.

5.22 In comparison to the region and national split, the HMA has a relative under-representation in agricultural, financial & insurance and professional, technical & scientific employment. The latter two sectors are particularly important as these tend to be viewed as higher value, growth-orientated sectors and explains why forecasts for employment growth are more modest relative to wider comparators in some parts of the HMA.

Baseline Economic Forecasts

5.23 For this SHMA the commissioning authorities purchased Oxford Economics forecasts. These forecasts look at the number of additional jobs that might be created in the HMA based on a ‘business as usual’ approach.

5.24 The forecast essentially considers how the national and regional economy might perform before disaggregating this to a local authority level. To do this consideration is given to past job growth as well as an understanding of how different sectors have performed against regional and national performance. The forecasts are inherently trend-based.

5.25 It should also be noted that the OE forecast constitutes one of the first forecasts prepared to include the “Brexit” decision within their projections. As such they reflect a number of OE central assumptions regarding the implication of Brexit. These are outlined below:

- OE assume that Prime Minister Theresa May triggers Article 50 by the end of this year, with the UK formally leaving the EU at the end of 2018. Given that immigration has been central to the leave campaign, OE assume that the government is unwilling to compromise on the free movement of labour. As a result, the UK loses access to the single market and its trade relationship with the EU reverts to WTO rules. OE also assume that the government uses these new powers in a ‘populist’ fashion and actively reduces the level of immigration.
- Following the vote, OE have downgraded the forecast for GDP growth in both the short and the long term. In the near term, increased uncertainty is likely to weigh on business confidence, leading to firms delaying capital spending. A weaker pound should provide some support to exports, but the experience from 2008-09 leads OE to take a relatively cautious view about the extent to which this will boost activity. At the same time, the weaker pound will also push up inflation, weighing on household purchasing power. The 2016 GDP growth forecast is unchanged at 1.8%, thanks to a stronger-than-expected first half, but both 2017 and 2018 growth have been downgraded to 1.1% and 1.4% respectively (from 2.3% and 2.2% in OE pre-Brexit forecast).
- Further out, curbs to migration will reduce the potential labour supply, lower investment spending will reduce the size of the capital stock and limited access to the single market will weigh on total factor productivity. Taken together, all of these factors will reduce the longer-term potential growth of GDP.

5.26 Table 30 shows the estimated job growth in each authority for the 2014-34 period. Overall there is a 5.2% increase in jobs anticipated in the HMA. This equals to 10,300 additional jobs between 2014 and 2034. In annual terms this equates to a 0.26% increase in job numbers or 514 jobs per annum.

Table 30: Employment Baseline forecast 2014 - 2034

	Jobs (2014)	Jobs (2034)	Change (2014-34)	Per Annum	CAGR
Chorley	46,811	53,224	6,412	321	0.64%
Preston	89,001	88,192	-808	-40	-0.05%
South Ribble	60,271	64,943	4,671	234	0.37%
HMA	196,083	206,359	10,276	514	0.26%

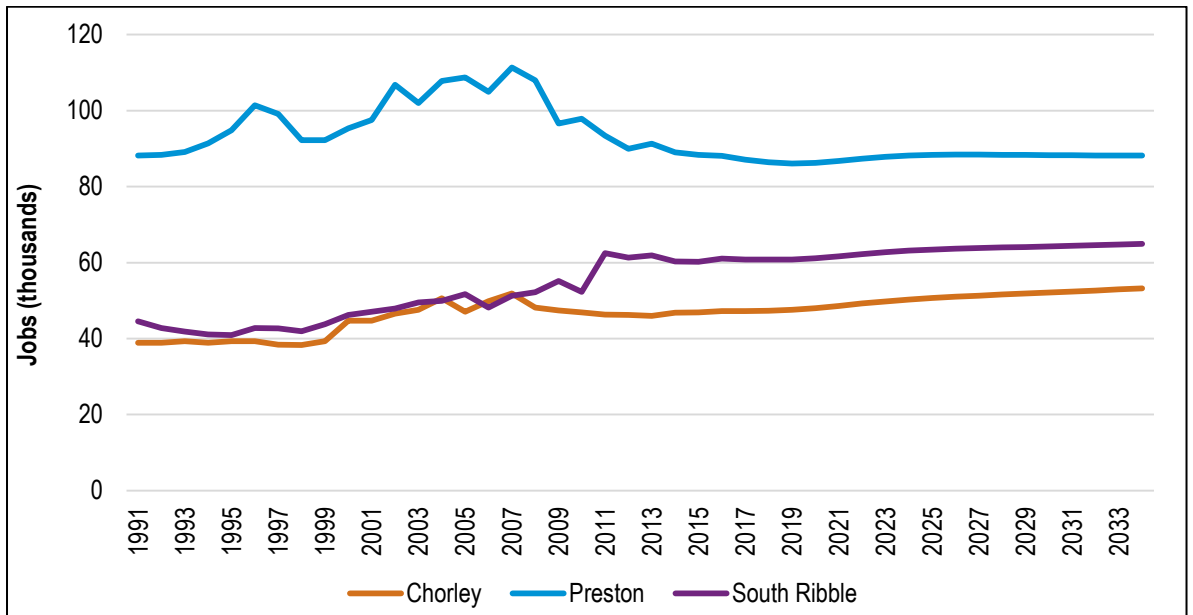
Source: OE July 2016

5.27 Chorley is expected to see the highest employment increase (13.7%) of the three local authorities. In South Ribble the increase is more moderate reaching the 7.8%. In contrast the total number of jobs in Preston is expected to decrease by 0.9% for the same period (2014-34).

5.28 Figures 34 and 35 show past and forecast job growth (the first chart showing the total number of jobs in each area and the second showing the same information indexed to 2014). The key finding to note from these charts is the variation in the past trend figures; in some areas a year-on-year

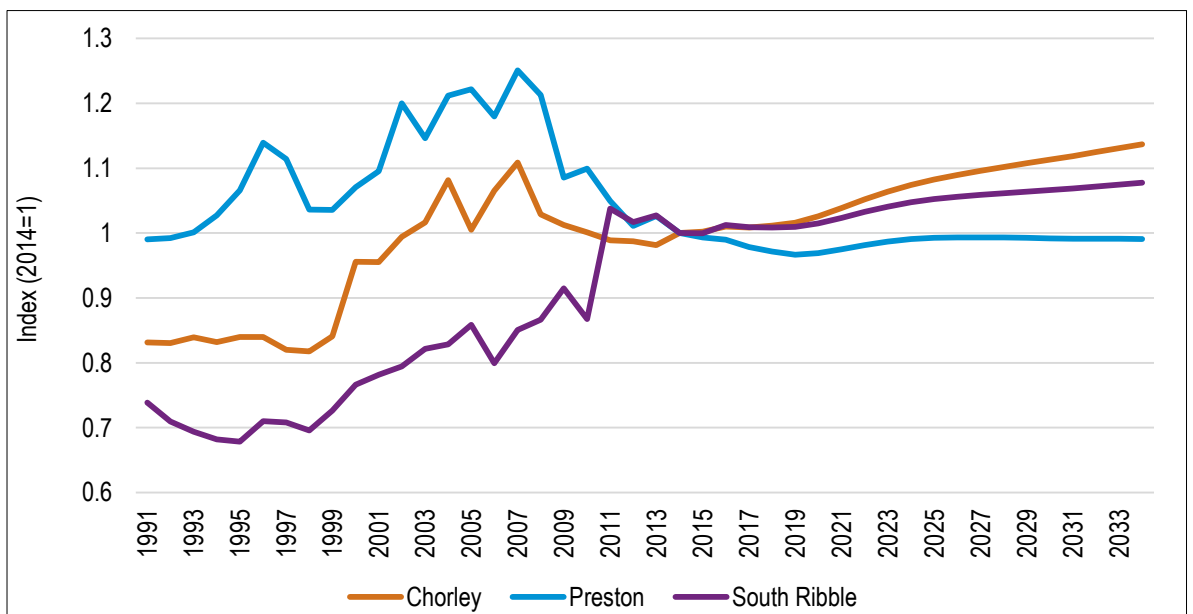
change of in excess of 5,000 jobs can be seen. In reality, such a change is unlikely and may well be driven more by the quality of data available than any real changes that may have occurred.

Figure 34: Total employment (jobs)



Source: Oxford Economics

Figure 35: Total employment (jobs) – indexed (2014=1)



Source: Oxford Economics

5.29 Overall the baseline forecasts project modest employment growth compared to the wider comparators, particularly for Preston. However, the forecast is only a tool in projecting future economic growth and is based on the assumption that the existing relationships with regional and national performance within each sector hold true. Therefore, the forecast should not be used uncritically in determining the appropriate level of employment need within the HMA.

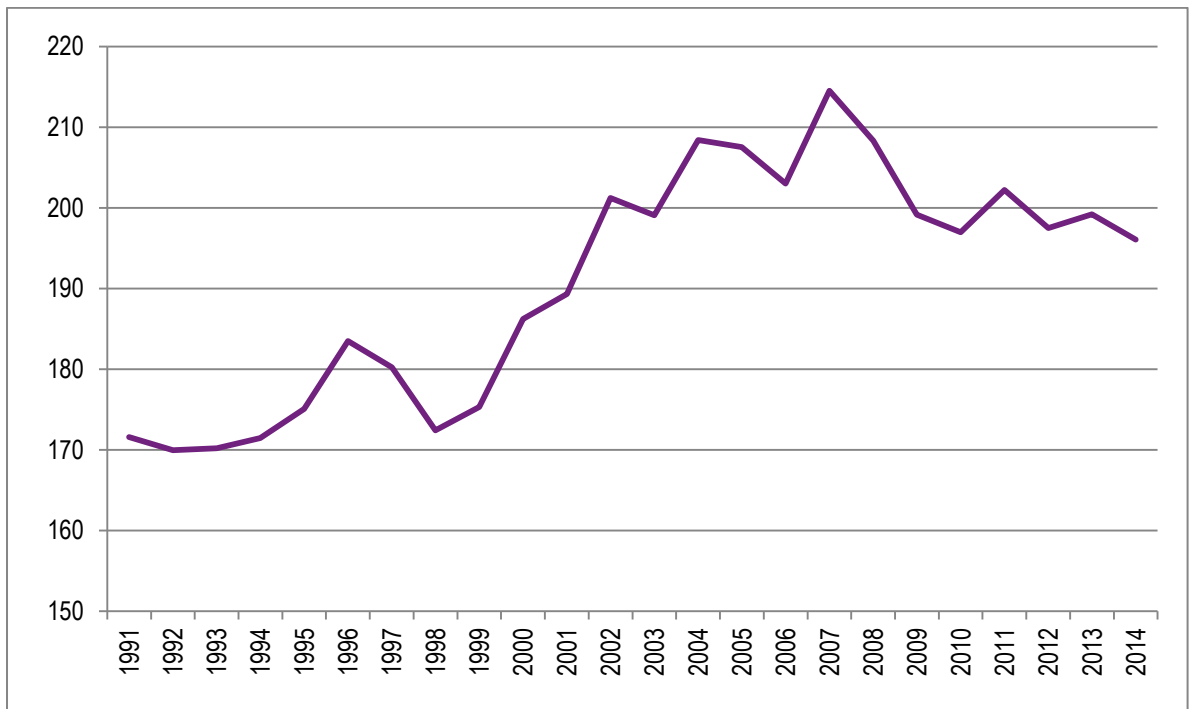
5.30 As an alternative we have sought to look at a trend based forecasts and examined a range of potential committed interventions which could see growth across the HMA being above the baseline forecast growth.

Trend Based Forecasts

5.31 Trends in employment growth vary significantly depending on the period from which trends are projected. Firstly we must look at the period from which trend forecasts could be derived. This, in GL Hearn’s view, should be based on the full business cycle, either peak to peak or trough to trough. This stops any trend based forecasts being unduly high or unduly low.

5.32 Figure 36 below looks historic jobs growth across the Central Lancashire area. As the timeline starts on a downward trajectory it is only possible to look at a trough to trough period from the most historic data. There appears to be a trough at 1992/1993 and again in 2010. Arguably there is a further trough at 1998 but this five year period from 1993 to 1998 is unlikely to be long enough to be considered a full business cycle. We have therefore sought to draw trends based over this 1993-2010.

Figure 36: The Baseline Economic Forecast – Central Lancashire



Source: OE July 2016

5.33 Table 31 profiles the employment growth for the 1993-2010 period. Overall, there was an increase of 16% in employment in the HMA. In particular, the job growth for Preston and South Ribble in the previous business cycle (1993-2010) is significantly higher on a per annum basis than the baseline forecasts (Table 30). Jobs in South Ribble increased by 25% with an absolute increase of more than 10,000 jobs. The growth in Chorley equated to a 19% increase and in Preston 10%.

- 5.34 The overall growth in Central Lancashire was around 26,800 additional jobs for the 1993-2010 period with an annual growth of around 1,600 jobs (0.9%). Putting in context, the annual rates of growth of UK was 0.8% and North West 0.4% (OE 2016). As shown in Table 31 extrapolating this forward would result in significant growth within the HMA.

Table 31: Trend Based Forecasts (2014-2034)

	Jobs (2014)	Jobs (2034)	Change (2014-34)	Per Annum Change	CAGR
Chorley	89,001	97,922	8,922	446	1.0%
Preston	60,271	70,551	10,280	514	0.6%
South Ribble	196,083	208,404	12,320	616	1.3%
HMA	345,355	376,877	31,522	1,576	0.9%

Source: OE July 2016

- 5.35 While we could expect some increase above the baseline forecast a tripling would appear overly optimistic particular given the fact all the major forecasting houses are expecting a slower rate of growth than that seen in the recent past. This reflects expected economic performance nationally, more limited public spending and slower expected global growth (including declining Chinese growth rates) and as discussed “Brexit”.
- 5.36 Furthermore what the analysis in Figure 31 also shows is that looking at more recent trends, employment levels have been relatively flat; and are broadly consistent with those seen in the early 2000s. Much of the growth seen over the 1993-2010 business cycle was prior to 2003. This serves to highlight the sensitivity of trend-based projections to the period used; and suggests that the projection forward of 1993-2010 trends is not really particularly realistic. The Oxford Economics forecasts are more comprehensive, taking account expected future performance of sectors and should be preferred.

Planned Growth Initiatives

- 5.37 Next GL Hearn has sought to consider whether there are particular local factors which could influence local economic performance. To assess this, GL Hearn held discussions with the economic development officers in each of the local authorities as well as Local Enterprise Partnership and the County Council to get a better understanding of the planned developments and policy interventions that might affect the employment growth. This has been then used to derive an alternative scenario for employment growth.
- 5.38 We have only sought to make modest adjustments to the baseline forecasts on the basis of major developments which have planning permission, have funding in place and/or have a reasonably likelihood of delivery and occupation. The adjustments on a sectoral basis reflect the type of occupiers which could be attracted. We have been mindful that any development may not generate an entirely new stream of employment in that some occupiers will be relocating from elsewhere in the HMA.

5.39 It should be noted that there have been development schemes, policy interventions and investment which has influenced historical economic performance (feeding into the baseline forecasts).

5.40 The following paragraphs present the key initiatives and local factors which could influence future performance for the local economy. We have also given consideration to the Lancashire Local Enterprise Partnership's Strategic Economic Plan.

The Strategic Economic Plan

5.41 The Strategic Economic Plan of the Lancashire Local Enterprise Partnership was published in 2014 and covers the period up to 2025. It identified the primary growth sectors for the area which related to the Aerospace, Automotive and Energy industries. The Strategy covers the whole county, rather than just the HMA.

5.42 The Lancashire Enterprise Zone is one of the LEP's Priorities that focuses mainly on the above growth sectors. The Enterprise Zone is one of 24 nationwide and is promoted as a centre of excellence for high technology manufacturing. Two locations both BAE Systems' sites are the heart of the Zone, namely Samlesbury (72 Ha) and Warton (75 Ha) Aerodromes. The first new occupiers moved onto the EZ sites in 2015.

5.43 Samlesbury Aerodrome lies within South Ribble boundary, located near M6/A59 Junction while Warton is within the Borough of Fylde; though both the sites are in proximity to the HMA and it is recognised that both influences the local economy of HMA. Aerospace is really strong in the area as businesses based in Lancashire Enterprise Zone have unrivalled opportunities to benefit from the hi-tech supply chain created by Britain's next-generation combat aircraft (the Lockheed Martin F-35) which will be built at BAE Systems' Samlesbury and Warton facilities over the next 25 years.

5.44 The presence of BAE Systems has attracted strong regional supply chains in many areas ranging from design, testing and manufacturing, to repair and maintenance. In Lancashire alone, BAE Systems contracts with 500 companies in the supply chain, generating revenue of £300m a year.

5.45 According to the Strategic Economic Plan there are 28,000 people employed in the aerospace industry within Lancashire. This represents the single largest concentration of aerospace activity in the UK, while North West England is rated as the fourth-largest aerospace cluster globally.

5.46 The Automotive sector also has an important base in Lancashire with a workforce of over 3,500 according to the LEP Strategic Economic Plan. Companies such as PACCAR (Leyland Trucks) Piolax which is located within the HMA, whilst Sanko-Gosei, Erlson, Futaba-Tenneco and TRW Automotive are key occupiers in Lancashire. There is again a strong supply chain, with the majority of the businesses focusing on the supply of high value parts to UK and European Original Equipment Manufacturers (OEMs) - a key Lancashire capability which the UK as a whole is seeking

to grow. Moreover Lancashire hosts a variety of companies involved in testing automobile including Torotrak, Clean Air Power and Scorpion Automotive.

- 5.47 Energy is the third growth sector identified. Over 37,000 people in Lancashire (mainly in North of the county) work in the power generation sector. Lancaster University and University of Central Lancashire contribute importantly in the sector with recognised centres of excellence in energy and environmental studies. National companies operating in the sector include a system which is located within the HMA (Preston), Springfield Fuels and Westinghouse-Toshiba which are in proximity to the Study area as well as EDF, AMEC PLC, SITA who operate in the wider area.
- 5.48 In addition to the three key growth sectors, there are a number of developing sectors highlighted in the SEP which relate to market specialisms and have potential to develop into significant value generating sectors in the future including *Health* which is already one of the strongest sectors in terms of employment; Aerospace and particular *Unmanned Aerial Vehicles* – an area in which BAE is closely involved. Digital Marketing and particular *Cyber Security* and *Software Applications* are growing and the University of Lancashire can potentially play a key role in supporting this sector's growth. Business Process Outsourcing, which generates the most Foreign Direct Investment into the UK, has the potential to grow further while the industry's leaders including Capita, HCL Technologies, CAP Gemini, Carphone Warehouse and HGS have bases in Lancashire albeit not within the HMA.
- 5.49 The SEP also highlights a number of other sectors to Lancashire economy, which it defines as important albeit not transformational. These are food manufacturing, the visitor economy and business and financial services.
- 5.50 The LEP has secured significant infrastructure funding that will enable key development initiatives. In particular, the Preston, South Ribble and Lancashire City Deal has established a £340m Infrastructure and Delivery Programme and £100m Investment Fund to help generate over 20,000 new jobs and deliver 17,420 new homes. The City Deal has also secured a 10-year funding allocation, 6-years confirmed and a further 4-years indicative, for local major transport schemes in Lancashire.
- 5.51 Transport for Lancashire is now working with key partners to guide a £313m total transport investment programme across Lancashire including the Heysham to M6 Link Road and Pennine Reach. The Central Lancashire Highway and Transport Master Plan, which underpins the Preston, South Ribble and Lancashire City Deal, has been approved by the County and its delivery will unlock economic and housing growth opportunities.

Central Lancashire Economic Regeneration Strategy

- 5.52 The Central Lancashire Economic Regeneration Strategy (May 2010) sets out the three Council's vision and priorities for the period to 2026. The report sets out plans to target support to grow strong local sectors including:
- Nuclear / Energy (including green energy, gas, wind and water power);
 - Advanced Manufacturing and Engineering;
 - Business and Professional Services;
 - Advanced recycling;
 - Digital / creative industries;
 - Visitor economy; and
 - Food and drink.
- 5.53 There are also a number of other initiatives set out including diversification of the rural economy and delivery of strategic sites at Cuerden; Preston; Royal Ordnance Factory; and Samlesbury. Unlocking these sites will result in over £360 million uplift in Gross Value Added (gross total), lever over £700 million private sector investment and create or support over 23,000 jobs (net FTE) within Central Lancashire by 2026 according to the Economic Regeneration Strategy.
- 5.54 Other investment includes at the Tithebarn regeneration scheme in Preston which will deliver over 100,000 sq. metres of commercial floorspace and 500 new jobs.

Local Economic Strategies

- 5.55 At local authority level, GL Hearn has reviewed local Economic Development Strategies as well as the retail studies, Business Improvement District commitments and Regeneration Strategies where available. It should be noted that some of these are now somewhat dated.

Chorley

- 5.56 Chorley Economic Development Strategy 2014 (Draft Report) supports the delivery of LEP's initiatives and commitments at a local authority level. The strategy focuses on the following priorities for Chorley:
- To promote and increase inward investment in Chorley through maximising best use of available employment land and buildings in the borough in order to support economic growth and provide a mix of well paid, high and low skilled jobs.
 - To provide support to new and existing businesses.
 - To create a vibrant town centre that attracts people from both the local community and visitors in the day and evening, for shopping, eating and entertainment.
 - To support people in accessing education, training and skills required by local businesses and supporting businesses to develop the skills of their existing workforce.
 - To reduce the gap in Chorley's most deprived communities and support them in becoming economically active and self-sustaining, supporting a reduction in levels of deprivation in the borough.

- 5.57 Chorley has a number of outstanding existing sites such as the Revolution Park at Buckshaw Village. This Park is respectively new (built after 2007) and is a focus for distribution activity. Royal Mail, Kimberly-Clark and CONAIR Cooperation have their distribution and depot facilities on the site.
- 5.58 Between 2010 and 2013 it is estimated that approximately 11 hectares of land has been developed for employment purposes, with half of this attributed to the Parcellforce distribution centre on the Revolution site. However the last main plot at the Revolution site is now fully complete, with G&A Pet Foods taking the final unit for distribution uses.
- 5.59 The Council have a range of Local Plan employment sites totalling 86 hectares (either in the development pipeline or designated employment allocations) although by 2016 this had reduced to 80 Ha. However not all of these allocations may come forward in their entirety for employment uses with:
- Around 14 ha at Great Knowley now being considered for residential;
 - Part of the 5.9 ha at Botany Bay now considered for retail outlet centre;
 - Part of the 13 ha at North of Euxton Lane now has planning permission for 125 houses and an extra care facility;
 - 15ha at Land east of Wigan Road has reduced to 8.03ha, the remainder of the original allocation will be used for residential uses (with proposals now being progressed) and associated services and facilities, including a primary school;
 - The 5.4ha allocation at Group 1 for B1 and B2 uses has reduced to 2.17ha due to outline permission/masterplan and Southern Commercial is now 3.16 ha in two parcels - the remainder of the land has been developed for a convenience store, public house and community centre.
- 5.60 The Council will continue to seek support from the LEP and LCC through such means as:
- the Growing Places Fund - to unlock sites which have planning or ownership issues, such as the land at junction 8 of the M61 and land to the east of the A49;
 - to support the continued delivery of employment sites, for employment creation rather than other usage such as housing; and
 - to maximise the opportunities that will be created as part of the City Deal with Lancashire County Council, Preston City Council and South Ribble Borough Council, particularly through linking the Curedon site with a 8 hectare site in Chorley to the east of Wigan Road (the Curedon site has a total area of 65 hectare located within South Ribble).
- 5.61 The Council set out the following key targets that complement the key priorities in order to enhance further its economic position:
- Maximising opportunities arising from the nearby Enterprise Zone sites in Samlesbury and Warton: The Enterprise Zone Status specialise in advanced engineering and manufacturing. This is expected to attract investment and employment into the region and as such provides an opportunity for encouraging investment in Chorley from supporting supply chain companies.
 - Strengthening existing key sectors already based in Chorley: Wholesale and retail trade makes up approximately 15% of Chorley's existing business base, employing over 5,000 local residents. This is a key sector for the borough and should continue to be supported through our business support offers to new and existing businesses.
 - Targeting identified growth sectors, particularly where there are already identified strengths: The health sector is strong in Chorley providing the most jobs of any sector and is in the top five in terms of volume of businesses. The SEP identified the health sector as a major employer. The LEP is putting significant investment into developing a Health Innovation Park

at Lancaster. Therefore, the Council aims to work with the LEP and health providers and networks to see how Chorley can support the further growth and investment of this sector in Chorley and within the region

- Targeting specific sectors which may be particularly suited to our employment sites such as storage, logistics and distribution.

5.62 The Economic Development Officer set out a number of committed schemes which are likely to support employment growth. However, in many cases these will simply deliver job growth forecast within Oxford Economics baseline forecasts, which already expect growth above national/ regional trends. Modest adjustments to the baseline forecasts where therefore warranted in Chorley.

Preston

5.63 Preston Economic Regeneration Strategy and Prioritised Action Plan, prepared in 2005, establish an £1.8billion programme of investment. The strategy focuses on the following key priorities:

- The City Centre Commercial Quarter will meet the raising requirements for office space within the centre of Preston;
- The City Centre Creative Quarter – development of a Creative Quarter south of Church Street to capitalise upon the investment potential of over 500 creative industries businesses in Preston;
- The Digital City – Preston has been at the forefront of providing wireless capabilities for users throughout the city centre. Coverage across the City and ensuring that the needs of businesses are fully met will be the next stage;
- Rationalisation of Employment Sites – market analysis and a business survey of the Preston area highlighted a healthy indigenous demand for a higher quality of space than currently exists. A priority therefore will be to improve the stock of commercial property in order to retain growing businesses;
- Delivering Strategic Sites – working together with South Ribble and Chorley, a portfolio of key strategic employment sites will be brought forward for development to attract new inward and indigenous investment;
- Sector Development – bespoke strategies to meet the needs and requirements of Preston’s competitive sectors will be developed and implemented; and
- University of Central Lancashire – ensuring that the research programmes of the University are aligned with the competitive sectors of the local economy and that the University plays a key role in knowledge transfer;
- Provision of transport infrastructure and key gateways through a number of interventions in order to complement the main priorities;
- Emphasis on Tourism and Heritage through an investment programme that seeks to capitalise upon the economic opportunities arising from some of its finest tourism and heritage assets.

5.64 Preston has a Business Improvement District (BID) focused towards improving the vibrancy and safety of the town centre. Preston’s Retail Study 2013 reveals that there is additional capacity for further improvement in the Town Centre’s retail provision and there are specific recommendations therein to support the council’s retail policies and strategies. The BID aims to increase the footfall of the town centre.

5.65 In discussion with the Economic Development Officer at Preston City Council it became apparent that Council do not view growth in Preston in isolation of the wider HMA. The general feeling was that growth in the urban area was good for the City. This was justified on the basis that it benefits the aggregate wealth of the Central Lancashire area. A working example was that a distribution

company moved from the City Centre to South Ribble as it had out-grown its base. The relocation had a net growth in the urban area, but also released land for a supermarket enabling further growth within the City.

- 5.66 Preston City Centre is a regionally-significant Strategic Employment Site. Regeneration of the area is to be led by entertainment and leisure uses. The Council have plans to redevelop the market area to develop a cinema and leisure offer. This will be complemented by the Guildhall which is being revamped and expanded. The Council are also looking to attract further leisure operators on the back of this redevelopment and there has been an application for a boutique hotel in the City Centre.
- 5.67 The Council have also made significant investment in improving the urban fabric along Fishergate. The aim is to increase footfall and reduce voids but they only have a certain amount of opportunities for larger footprint units and are unlikely to attract major investment. However investment in the urban fabric will improve the quality of the offer. The City Centre is also a Housing Action zone which could directly influence local footfall and the night-time economy.
- 5.68 Preston does not have a large level of office-based employment in the City Centre and they are promoting the area to entice more business into the City Centre. There is however some risk from consolidation of HM Revenues and Customs offices which currently have a large presence in the City.
- 5.69 The University of Central Lancashire are planning a £700m expansion of their campus over the next ten years. Not only will this increase/improve the university's teaching facilities but will also deliver high quality incubators incubator suites. The University specialises in technical manufacturing and in particular aerospace. They are also cooperating with Manchester Metropolitan University to create a number of super-apprenticeships in this sector.
- 5.70 The Preston East/Roman Way area is being promoted by both the Council and the HCA. They have had high interest from developers/occupiers looking at new build properties although to this point, interest is for Car Showrooms. There is however potential for larger uses once competing sites are built out.
- 5.71 Most of the Council owned sites are highly occupied – (void rate 1.9%) compared to regional benchmarks (8% void rate). This suggests potential unmet demand in the City. There are also indications of smaller businesses expanding locally, with many moving from the inner city area to the wider urban area – emphasising the inter-connected nature of the sub-regional economy. This is also ratified by “bank-search” data which suggests an increasing number of business bank accounts being held local.

South Ribble

- 5.72 South Ribble Economic Regeneration Strategy 2009-18 aims to:
- Diversify areas of specialisation & focus on growing smaller flexible knowledge enterprises;
 - Develop creative industries;
 - Build on public/private sector strengths & forge links to Universities
 - Linking regeneration to economic strategies;
 - Invest in skills which match our aspirations; and
 - Develop modern flexible infrastructure for technology, transport and amenity and tie into appropriate environment, quality housing and family facilities.
- 5.73 The Council focuses on a range of advanced manufacturing industries (automotive, aerospace, biotechnology etc.) and producer services (business, creative, technology, legal etc.) in order to increase value within the local economy.
- 5.74 The Economic Regeneration Strategy outlines that South Ribble and Leyland will provide higher quality infrastructure (technology, transport, amenity and business support) to attract investment and develop existing and new communities. They also hope to invest in the town to make it more attractive to local businesses.
- 5.75 The Strategy sets out that South Ribble provides a substantial proportion of the large, accessible employment areas in Central Lancashire, which are vital for economic growth.
- 5.76 In October 2015, the Council published its Employment Land and Property Study prepared by BE Group and Ekosgen. Similarly to this report, Oxford Economics (OE) forecasts were used to consider employment growth in the Borough. The study provided three growth scenarios:
- The baseline of 4,900 net additional jobs between 2014 and 2026.
 - The “adjusting the baseline” scenario of 6,400 net additional jobs between 2014 and 2026. The baseline was adjusted by increasing the level of growth by 25 percent across all sectors that were expected to grow between 2015 and 2026. In addition that scenario was based on the following assumptions:
 - The growth of public sector from 1998 would not be repeated.
 - Professional and business services sector was forecasted to grow.
 - The construction sector would continue to grow.
- 5.77 An “aspirational growth” scenario was also shown, of 10,500 net additional jobs. That scenario took the adjusted baseline scenario and included additional growth in sectors where additional demand could arise from the delivery of the City Deal and LEP’s plans.
- 5.78 The Council’s Economic Development Team have identified the potential for growth in transport/distribution activities through expansion of Leyland Business Park. Further development potential exists at the “South Rings Cuerden” Site (12.55ha). The site was expected to facilitate growth in the Business Administration & support sector; as well as transport/ storage and health and fitness

facilities. There are a number of other expanding sites such as Moss Side Test Track and Farington Hall Estate which could support growth in the Business Administration sector.

- 5.79 Further development within Lancashire Business Park is expected to facilitate and boost the Transport, Storage and Wholesale or Manufacturing sectors.
- 5.80 GL Hearn has sought to model the potential impact of these factors through adjustments to the baseline Oxford Economics forecasts. Our Planned Growth Scenario, considered below, is more positive than the BE Group adjusted baseline forecast.

Planned Growth Scenarios

- 5.81 GL Hearn has sought to bring the above analysis together to derive an alternative scenario for employment growth. This represents an alternative scenario and should be considered alongside the baseline forecasts – the two effectively providing a range. It has been developed by applying adjustments to the OE baseline based on the assumption of stronger employment growth in some sectors, facilitated by a number of the developments and initiatives discussed above.
- 5.82 It should be stressed that the adjustments are not “policy-on” in that the neither reflect policy or capacity constraints to the delivery of employment land nor policy aspirations as to certain levels of growth. These essentially represent an alternative scenario for how the economy *might* perform, recognising that long-term economic forecasting is inherently uncertain given the range of factors – both at a macro and local level – which can influenced economic growth and investment decisions.
- 5.83 While we consider it that the scenarios considered herein represent a reasonable assessment for demand-led economic growth, it should not stop local authorities planning for a higher level of employment growth should they aspire to this. Policy decisions by the authorities, land supply and other local factors may also influence the distribution of future employment growth between the authorities within what is effectively a single local economy.
- 5.84 Table 32 shows the adjusted job growth in each authority for 2014-34 period against the baseline forecast by OE. Overall there is an increase of just over 5,000 jobs anticipated in the HMA in this scenario. This equals to 15,300 additional jobs between 2014 and 2034. In annual terms this equates to 766 jobs.

Table 32: Employment forecast 2014 - 2034 and Planned Growth

	Baseline		Planned Growth	
	2014-2034	Per annum	2014-2034	Per annum
Chorley	6,412	321	6,466	323
Preston	-808	-40	1,799	90
South Ribble	4,671	234	7,048	352
Central Lancashire	10,276	514	15,313	766

Source: Oxford Economics & GL Hearn

Linking Job Growth and Changes to Resident Labour Force

5.85 The analysis above has set out a range of potential scenarios for changes in the number of jobs in the HMA and individual local authorities. However, for the purposes of analysis linked to demographic data it is necessary to convert this into estimates of the required change to the economically active population. The number of jobs and resident workers required to support these jobs will differ depending on two main factors:

- Commuting patterns – where an area sees more people out-commute for work than in-commute it may be the case that a higher level of increase in the economically active population would be required to provide a sufficient workforce for a given number of jobs (and vice versa where there is net in-commuting);
- Double jobbing – some people hold down more than one job and therefore the number of workers required will be slightly lower than the number of jobs.

Commuting patterns

5.86 Commuting patterns will be influenced by a range of factors including demographic factors (the population and workforce growth in different areas), where new homes and jobs are delivered, and investment in infrastructure. For modelling purposes only it is necessary to make some high-level assumptions.

5.87 Table 33 shows summary data about commuting to and from each local authority from the 2011 Census. Overall the data shows that Central Lancashire sees a small level of net in-commuting for work with the number of people resident in the HMA who are working being about 2% lower than the total number who work in the area. This number is shown as the commuting ratio in the final row of the table and is calculated as the number of people living in an area (and working) divided by the number of people working in the area (regardless of where they live). This indicates a broad balance between jobs and residents in work across the HMA.

5.88 For individual local authorities, figures are somewhat different – emphasising the inter-relationships between the three local authorities. Preston sees net in-commuting; with net out-commuting evident from Chorley and South Ribble.

Table 33: Commuting patterns in Central Lancashire and local authorities (2011)

	Chorley	Preston	South Ribble	Central Lancashire
Live and work in LA	17,280	34,082	17,478	-
Home workers	5,890	5,113	4,775	-
No fixed workplace	3,665	3,874	3,484	-
In-commute	15,013	44,401	23,570	-
Out-commute	27,055	21,393	30,299	-
Total working in LA	41,848	87,470	49,307	178,625
Total living in LA (and working)	53,890	64,462	56,036	174,388
Commuting ratio	1.29	0.74	1.14	0.98

Source: 2011 Census

- 5.89 In translating the commuting pattern data into growth in the labour-force for modelling purposes, it is assumed that the commuting ratio remains at the same level as shown by the 2011 Census (i.e. it is assumed that the growth in the number of residents who are economically active will need to be 2% lower than the increase in the number of jobs (across the HMA)) – individual local authority figures have been used in the analysis.
- 5.90 It should be noted that whilst holding these commuting ratios constant is common practice in SHMA research, it is the case that these could well change in the future. Indeed, analysis of the OE forecast suggests that by 2014 there had already been some changes to commuting patterns (particularly in Chorley and Preston). Whilst this change may not be a real change as it will be influenced by the quality of the trend data and reasonableness of modelling assumptions, it does need to be borne in mind when interpreting the findings that commuting in reality is unlikely to remain the same in the future. Indeed changes in commuting may well be reasonable influenced by the close economic inter-relationships between the three authorities, and locations of major employment sites.

Double Jobbing

- 5.91 As well as commuting patterns, the analysis also considers that a number of people may have more than one job (double jobbing). This can be calculated as the number of people working in the local authority divided by the number of jobs. Data from the Annual Population Survey (available on the NOMIS website) suggests across the HMA that around 3.6% of workers have a second job (based on trend data going back to 2004 to recognise relatively high error margins associated with data for individual years). This gives a double jobbing ratio of 0.964 (i.e. the number of jobs can be discounted by 3.6% to estimate the required change in the workforce). The double jobbing percentages for each of the individual local authorities has been estimated as:
- Chorley – 4.2%
 - Preston – 3.3%
 - South Ribble – 3.4%

- 5.92 As with the commuting data, it has been assumed in the analysis that the level of double jobbing will remain constant over time. Again, in reality, this is likely to change and it should be noted that OE (in general and at a national level) expect the proportion of people with more than one job to increase slightly in the future.

Labour-force growth

- 5.93 In order to estimate the change in the resident workforce which is required to match the forecast number of jobs, the commuting ratio is multiplied by the amount of double jobbing (to give an adjustment factor) and in turn multiply this by the number of jobs..
- 5.94 Overall, Table 34 shows that in order to meet the forecast growth in jobs (of 766 per annum) a slightly lower level of resident workforce growth would be needed (of about 851 people each year).

Table 34: Forecast job growth and change in resident workforce

	Baseline			Planned Growth		
	Additional jobs (pa)	Change in resident workforce (pa)	Change in resident workforce (2014-34)	Additional jobs (pa)	Change in resident workforce (pa)	Change in resident workforce (2014-34)
Chorley	321	395	7,908	323	399	7,974
Preston	-40	-29	-576	90	64	1,282
South Ribble	234	257	5,131	352	387	7,741
HMA	514	623	12,463	766	850	16,997

Source: OE, NOMIS and 2011 Census

Linking Resident Workforce Change to Demographic Projections

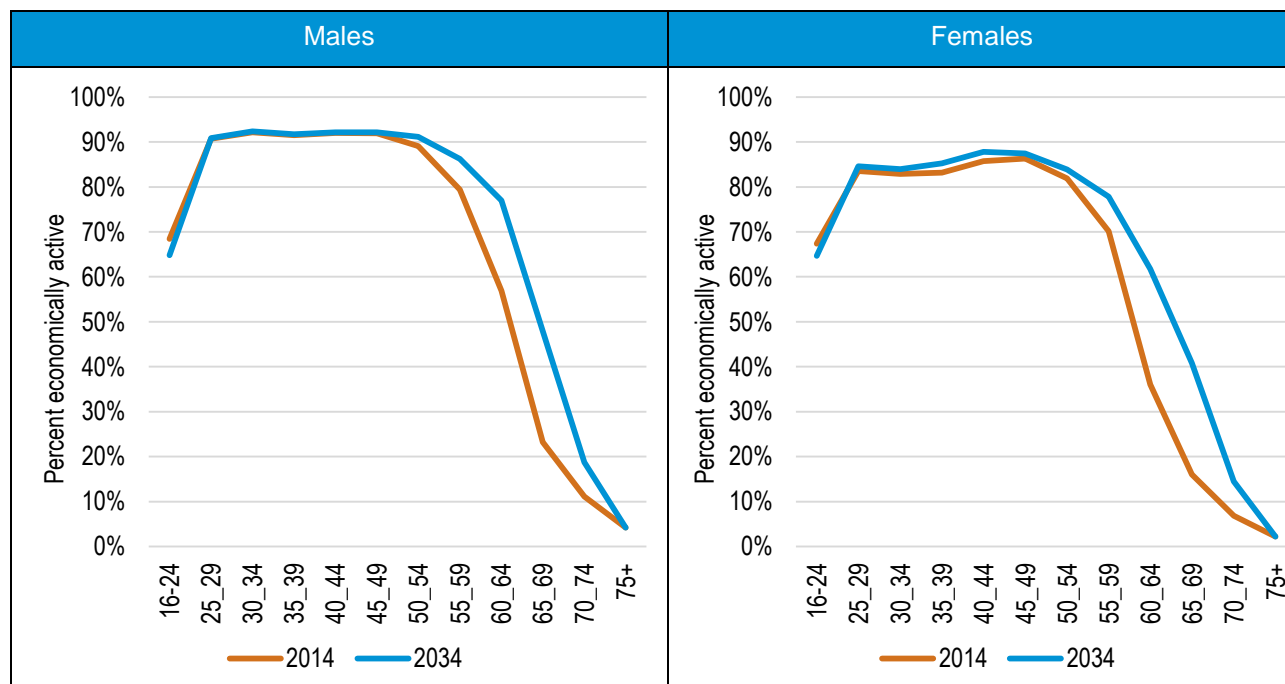
- 5.95 Having estimated the likely required change to the workforce under a range of scenarios the next stage is to estimate how much growth is implied by demographic projections (to allow for a comparison between jobs and workforce growth). Making the link between population and the resident workforce is a very difficult issue with no set methodology and a range of different methods and views being used. It is considered, having studied this for many years, that it is impossible to precisely forecast how economic activity or employment rates will change in the future and hence any approach must be treated with a degree of caution. For example, all of the main forecasting houses (Experian, Oxford Economics and Cambridge Econometrics) use population data as an input to their forecasts and each will estimate different levels of job growth (and indeed other variables such as the growth in the resident workforce). Inherently, each of the forecasting houses are therefore suggesting that whatever level of job growth they expect, this will be met by the population (and the population as it is projected to change). At a national level all of the three main forecasting houses typically forecast a similar level of job growth (or changes to the number of residents in employment when the forecasts are worked through in detail). However, only Experian publish age and sex specific data about how economic activity rates might change (this data is

available directly from Experian and underpins the document 'Comparison between Experian and OBR Participation Rate Projections' (February 2016). The data from Experian has therefore been used in this assessment.

- 5.96 Some consultancies (both for public and private sector clients) have looked for other sources of employment or economic activity rate data; the most commonly used being a set of figures published by the Office for Budget Responsibility (OBR). These however are at a national level and are not robustly applicable to smaller areas. Perhaps more significantly, the level of job growth (growth in residents in employment) estimated by OBR is significantly lower than from any of the main forecasting houses (a growth in residents in employment of about 2,000,000 from 2014-35 compared with a figure in excess of 4,000,000 in the most recent Experian forecast for the United Kingdom). This means that the OBR employment/activity rate figures cannot realistically be used when testing job growth levels from forecasts, as they relate to a completely different set of national assumptions.
- 5.97 One final set of rate data that is utilised is that published by Kent County Council (KCC) in November 2014. This is specific to Kent and so not applicable in other areas, however, more importantly many of the rates used in the model draw from a 2006 ONS publication (about projecting economic activity rates) .This publication can (by 2014) be seen to have been substantially wrong for all age groups where a reasonable comparison can be made with more up-to-date information.
- 5.98 Considering the range of evidence, GL Hearn conclude that for the purposes of this SHMA use of the Experian projections was the most appropriate as it took account not only of State Pension Age changes but socio-economic drivers, including:
- Expected improvements in the participation of females in older age groups as evidenced by today's participation rates of younger cohorts (who will age into those older groups);
 - Expected changes in behaviour connected with improved longevity and health; changes to patterns of work (allowing older people to continue working under more flexible arrangements); and changes in the industrial composition of the economy (especially the shift to services). Improving health and longevity will result in a need for people to build up savings for a longer retirement.
- 5.99 These economic factors are clearly likely to influence trends in economic participation and are not fully captured in the OBR projections.
- 5.100 The Experian figures have then been adjusted on the basis of Census data to match actual age/sex specific data for each local authority in Central Lancashire – the Central Lancashire figures below are therefore indicative with the actual local authority assumptions to be found in Appendix A.
- 5.101 The analysis shows that the main changes to economic activity rates are projected to be in the 60-69 age groups – this will to a considerable degree link to changes to pensionable age, as well as

general trends in the number of older people working for longer (which in itself is linked to general reductions in pension provision). Intuitively, the figures look to be reasonable.

Figure 37: Projected changes to economic activity rates (2014-34) – Central Lancashire



Source: Based on Experian and Census (2011) data

Table 35: Projected changes to economic activity rates (2014-34) – Central Lancashire

	Males			Females		
	2014	2034	Change	2014	2034	Change
16-24	68.5%	64.8%	-3.7%	67.4%	64.6%	-2.7%
25-29	90.7%	90.9%	0.2%	83.5%	84.6%	1.1%
30-34	92.2%	92.3%	0.2%	82.9%	84.0%	1.1%
35-39	91.5%	91.7%	0.2%	83.2%	85.2%	2.0%
40-44	92.0%	92.1%	0.2%	85.8%	87.8%	2.1%
45-49	92.0%	92.1%	0.2%	86.3%	87.4%	1.1%
50-54	89.1%	91.2%	2.1%	81.9%	83.9%	2.0%
55-59	79.4%	86.2%	6.8%	70.1%	77.9%	7.7%
60-64	56.9%	77.0%	20.1%	36.0%	61.8%	25.7%
65-69	23.2%	47.9%	24.7%	16.0%	40.8%	24.7%
70-74	11.1%	18.8%	7.6%	6.8%	14.4%	7.6%
75+	4.2%	4.2%	0.0%	2.2%	2.2%	0.0%

Source: Based on Experian and Census (2011) data

What is the change to the economically-active population?

- 5.102 Working through an analysis of age- and sex-specific economic activity rates it is possible to estimate the overall change in the number of economically active people in the HMA. This is set out in Table 36.
- 5.103 The analysis shows that linked to the 2014-based SNPP there would be an increase in the economically active population of about 9,600 people and that this would potentially support about 440 jobs per annum. This figure is lower than the number of jobs in the OE baseline forecast (514 per annum). The projections linked to 15-year migration trends would provide a workforce growth of about 16,150 (equivalent to about 862 jobs per annum); some way above that suggested as required by the OE forecast, and also higher than the uplifted forecast figure.

Table 36: Estimated change to the economically active population (2014-34) – Central Lancashire

	Economically active (2014)	Economically active (2034)	Total change in economically active	Per annum change	Implied jobs per annum
2014-based SNPP	188,648	198,231	9,583	479	441
2014-based SNPP (+MYE)	188,648	199,197	10,549	527	491
10-year migration	188,648	197,954	9,306	465	387
15-year migration	188,648	204,797	16,149	807	862

Source: Derived from demographic projections

- 5.104 A similar analysis has been provided below for each of the individual local authorities. This shows a range of potential job growth depending on the scenario studied. If focusing on the 15-year migration projection it can be seen that demographic growth Preston would more than support the anticipated jobs growth. Demographic growth in South Ribble could support a similar level of jobs growth to the baseline forecasts for the Borough but not the Planned Growth Scenario.
- 5.105 The demographic starting point in Chorley could support a level of jobs which exceeds both the baseline and planned growth scenario for the Borough. However, a longer term trend projection means the demographic growth would fail to support a level of jobs in excess of the baseline forecasts.
- 5.106 Overall, it should be noted that across the HMA, the 15-year projection would support more job growth than is contained within either of the two forecasts studied. The approach to focussing on the HMA has been supported in a recent High Court decisions (St. Modwen Vs East Riding of Yorkshire Council) and seems sensible given uncertainties associated with accurately forecasting economic growth at a local authority level; and the close economic and labour market linkages between the HMA authorities. This is set out in more detail later in this chapter.

Table 37: Estimated change to the economically active population (2014-34) – Chorley

	Economically active (2014)	Economically active (2034)	Total change in economically active	Per annum change	Implied jobs per annum
2014-based SNPP	58,994	66,981	7,987	399	324
2014-based SNPP (+MYE)	58,994	67,198	8,204	410	333
10-year migration	58,994	64,986	5,992	300	243
15-year migration	58,994	64,016	5,023	251	204

Source: Derived from demographic projections

Table 38: Estimated change to the economically active population (2014-34) – Preston

	Economically active (2014)	Economically active (2034)	Total change in economically active	Per annum change	Implied jobs per annum
2014-based SNPP	71,127	72,926	1,799	90	126
2014-based SNPP (+MYE)	71,127	73,228	2,102	105	147
10-year migration	71,127	70,839	-288	-14	-20
15-year migration	71,127	77,275	6,149	307	431

Source: Derived from demographic projections

Table 39: Estimated change to the economically active population (2014-34) – South Ribble

	Economically active (2014)	Economically active (2034)	Total change in economically active	Per annum change	Implied jobs per annum
2014-based SNPP	58,528	58,324	-204	-10	-9
2014-based SNPP (+MYE)	58,528	58,771	243	12	11
10-year migration	58,528	62,130	3,602	180	164
15-year migration	58,528	63,506	4,978	249	227

Source: Derived from demographic projections

Housing Need linked to job-growth forecasts

- 5.107 As well as looking at the level of growth in the economically active population suggested by demographic projections, it is of use to consider what level of housing might be required for forecasts or past trends to be met. This analysis is predominantly designed to see if there are any areas where there is either a clear workforce shortage or a workforce surplus. Within the modelling, migration assumptions have been changed so that across each local authority the increase in the economically active population matches the increase in the resident workforce required.
- 5.108 The forecasts assume existing commuting 'ratios' are maintained and should be treated with a degree of caution – they project for instance growing out-commuting from South Ribble and Chorley and in-commuting to Preston, which contrasts to the evidence arising from the demographic

analysis which shows a younger population structure supporting stronger workforce growth in Preston.

- 5.109 The changes to migration have been applied on a proportionate basis; the methodology assumes that the age/sex profile of both in- and out-migrants is the same as underpins the SNPP with adjustments being consistently applied to both internal (domestic) and international migration. Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%). Once the level of economically active population matches the job growth trend/forecast the population (and its age structure) is modelled against CLG headship rates to see what level of housing provision that might imply.
- 5.110 Table 40 below shows estimates of housing need set against each of the job growth scenarios. The analysis shows a range of housing need between 1,031 dwellings per annum (linked to the OE forecast) up to 1,184 when linking the data to the planned growth forecast. The higher of these figures is virtually identical to that shown by the demographic projection linked to 15-year migration trends (a need for 1,171 dwellings per annum). Taking all of this evidence together suggests that across the HMA there is a good match between potential job growth and the likely growth in the resident workforce.

Table 40: Projected housing need – range of job-led scenarios and 2014-based headship rates – Central Lancashire

	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
Baseline	151,638	171,732	20,094	1,005	1,031
Planned Growth	151,638	174,697	23,059	1,153	1,184

Source: Demographic projections

- 5.111 Tables 41-43 below show the same information for each of the individual local authorities. The general picture emerging is that housing need when set against the economic forecasts is generally higher in South Ribble and Chorley than the demographic-based projections; the opposite being true in the case of Preston. The difference between economic- and demographic-based projections does however depend on the scenarios being tested. Overall, this analysis suggests that there may be some case for considering the locations of housing to assist in providing homes in the same areas as jobs, although this will ultimately be a policy decision. Overall, it needs to be stressed that at the HMA level there is a good match between demographic projections and job growth forecasts.

Table 41: Projected housing need – range of job-led scenarios and 2014-based headship rates – Chorley

	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
Baseline	47,000	57,075	10,075	504	517
Planned Growth	47,000	57,119	10,119	506	519

Source: Demographic projections

Table 42: Projected housing need – range of job-led scenarios and 2014-based headship rates – Preston

	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
Baseline	57,933	61,008	3,075	154	159
Planned Growth	57,933	62,275	4,342	217	225

Source: Demographic projections

Table 43: Projected housing need – range of job-led scenarios and 2014-based headship rates – South Ribble

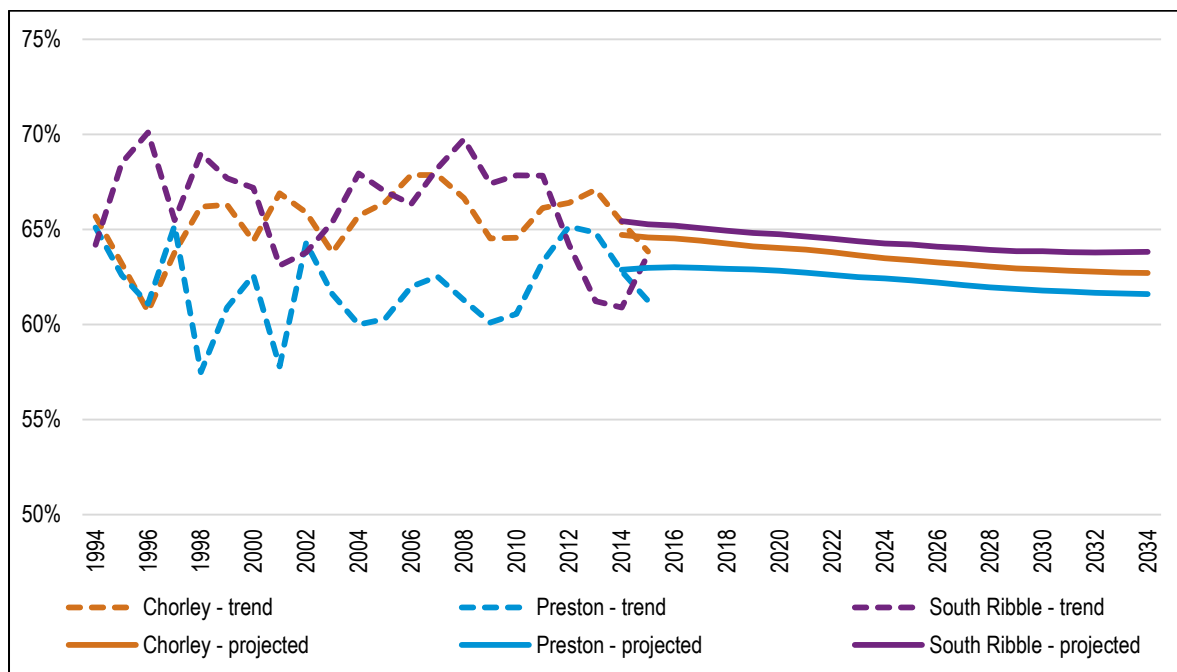
	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
Baseline	46,705	53,650	6,944	347	355
Planned Growth	46,705	55,303	8,598	430	440

Source: Demographic projections

Sense checking the Outputs

- 5.112 The analysis above is based on taking levels of job growth from the future forecasts and then applying a series of assumptions about commuting double jobbing and economic activity to give an overlay with population change and hence housing need. Clearly in doing this there is a range of assumptions made which could potentially be challenged (i.e. whilst they are considered to be reasonable it is accepted that different assumptions (particularly around economic activity) could have been used.
- 5.113 The analysis below therefore seeks to ‘sense check’ the assumptions by testing some of the analysis. Firstly, the method used to look at economic activity provides an indication of how the overall economic activity rate is likely to change (for the population aged 16 and over), this can be contrast with past trends drawn from the Annual Population Survey and Labour Force Survey. Figure 38 shows the past trends and how this is expected to change in the future; the analysis is based on the proportion of the population aged 16 and over who are economically active.

Figure 38: Past trends and future projected economic activity rates (based on population aged 16+)



Source: Annual Population Survey, Labour Force Survey and demographic projections

- 5.114 The data shows considerable year-on-year variation in the past trends (which is due to a considerable degree to the error margins associated with the data). Overall the data suggests little change in economic activity rates going back over the past 20-years or so (back to 1994). Moving forward the projections are suggesting that economic activity rates will remain broadly steady (or even decrease slightly).
- 5.115 It should be recognised that the past trends are likely to be slightly less affected by the ageing of the population although over this period the proportion of older people in the population did increase. On this basis it might be expected that in the future there would be some decline in economic activity rates (which is to some degree shown). However, the future trends do need to be considered in light of changes to pensionable age, which are likely to keep many people in the workforce for longer.
- 5.116 Overall, taking account of the data and various factors feeding into the information, it is considered that there is a reasonable alignment between past trends and the future projection in terms of the overall economic activity rate of the resident population.
- 5.117 The second sense check uses the population projection data underpinning the OE forecast (baseline). OE provides an estimate of the total population in each local authority for each year through to 2034. An analysis has therefore been developed to match the population growth through to 2034. In modelling this change in population it is then possible to overlay the CLG headship rates to see what level of housing need this might imply.

- 5.118 Table 44 shows that by using the OE population data (baseline forecasts), there would be a need for around 854 additional dwellings per annum to be provided. This figure is lower than that derived from projections linked to the SNPP (934 dwellings per annum) and also below the figures from other demographic scenarios and the two economic-led projections. This shows that the analysis in this report does not under-estimate housing need when set against economic forecasts.

Table 44: Projected housing need using OE population estimates within modelling and 2014-based headship rates

	Households 2014	Households 2034	Change in households	Per annum	Dwellings (per annum)
Chorley	47,000	56,037	9,037	452	463
Preston	57,933	61,533	3,600	180	186
South Ribble	46,705	50,705	3,999	200	205
Central Lancashire	151,638	168,275	16,637	832	854

Source: OE and demographic projections

- 5.119 OE's assumptions take into account those relating to changes in commuting and economic participation which are internal to the economic model.

Distribution of Growth

- 5.120 Although the demographic scenario based on longer term trends and the planned growth scenario very similar levels of housing need across the HMA the location of growth is substantially different. The economic need focussed growth in Chorley and South Ribble; and the demographic growth from the longer-term trends focused growth in Preston and Chorley.
- 5.121 It is therefore common sense to review the extent of the disconnect between demographic and economic projections across the wider area and to make reasonable assumptions as to their future direction. The focus of this should therefore be the HMA level. This position is further confirmed by the High Court decision in the case of "*St Modwens Developments Ltd vs East Riding and Save our Ferriby Action Group.*"
- 5.122 In his judgement, Mr Justice Ouseley sets out that he "*consider(s) that an assessment of need based on the HMA should be understood as an integral requirement arising from national planning policy for housing, rather than the outcome of a second stage of policy-making at the local level.*" The judgement empathises consideration of housing needs at the HMA level; and recognises the role of sensible planning judgement in considering issues related to the distribution of that need.
- 5.123 GL Hearn consider that the balance between jobs and homes should be considered at the HMA level, and may influence the distribution of housing need between areas. These are issues which require consideration through the duty to cooperate.

- 5.124 The evidence suggests that there is a need to make a slight upwards adjustment to the assessed need to support the delivery of the Planned Growth Scenario (1,184 dpa), when compared for instance to the highest of the demographic-led scenarios (1,171 dpa). The economic-led scenarios, from an evidential point of view, should be treated as a range.
- 5.125 However, GL Hearn considers that where an authority is meeting the unmet needs from another, this would also support population and workforce growth within the receiving authority's area. On this basis it is important not to double count unmet needs and provision to meet economic growth.

Future Employment and the Link to Housing: Key Messages

- The analysis has sought to estimate the likely level of housing needed to be delivered if the resident workforce is to increase sufficiently to meet both job-growth forecasts and an analysis of past trends. The main purpose of the analysis was to establish if there are any clear spatial imbalances between where population growth is projected to occur and where the jobs might be provided.
- The analysis took account of the commuting patterns and double jobbing, as well as making a series of assumptions about how economic activity rates might change in the future. This latter point is a key difficulty in matching job-growth to population growth.
- In running the modelling, it is estimated that to meet the planned growth forecast there would need to be provision of between 1,031 - 1,184 dwellings per annum across the HMA (2014-34).
- These figures broadly align with the upper end of the demographic need 1,171 dwellings per annum, based on longer term migration trends which sit towards the higher end of the range.
- Looking at individual local authorities, there was some suggestion that there might be a labour-force shortage in South Ribble and Chorley; however, the data also identified a potential surplus of labour-supply in Preston (through the longer-term demographic growth). These issues will however be influenced by the spatial distribution of housing and employment land within the HMA, which falls within a common travel to work area; as well as the potential for commuting to change.
- Cross-checking the outputs from the modelling with other outputs in the economic forecasts and past trends (around population growth and economic activity rates) suggested that the analysis in this document does not under-estimate the need for housing when set against economic forecasts.

6 AFFORDABLE HOUSING NEED

Introduction

6.1 In this section we discuss levels of affordable housing need in Central Lancashire. Affordable housing need is defined in the NPPF (annex 2) as *‘social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market’*.

6.2 The PPG sets out a model for assessing affordable housing need – this model largely replicates the model set out in previous 2007 SHMA guidance (which contained more detail about specific aspects of the analysis and so is referred to in this section as appropriate). The analysis is based on secondary data sources. It draws on a number of sources of information including 2011 Census data, demographic projections, house prices/rents and income information. Paragraph 14 of the PPG 9 (Reference ID: 2a-014-20140306) sets out that:

“Plan makers should avoid expending significant resources on primary research... They should instead look to rely predominantly on secondary data (e.g. Census, national surveys) to inform their assessment which are identified within the guidance”.

6.3 The affordable housing needs model is based largely on housing market conditions (and particularly the relationship of housing costs and incomes) at a particular point in time – the time of the assessment – as well as the existing supply of affordable housing (through relets of current stock) which can be used to meet affordable housing need. Given the range of data available, a base date of 2015 is used. However, for the purposes of consistency with the demographic projections, data is presented as per annum data for the period 2014-34.

Key Definitions

6.4 We begin by setting out key definitions relating to affordable housing need, affordability and affordable housing.

Affordable Housing

6.5 The NPPF provides the definition of affordable housing (as used in this report). The following is taken from Annex 2 of NPPF.

“Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”

6.6 Within the definition of affordable housing there is also the distinction between social rented affordable rented, and intermediate housing. Social rented housing is defined as:

“Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.”

6.7 Affordable rented housing is defined as:

“Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).”

6.8 The definition of intermediate housing is shown below:

“Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.”

6.9 As part of our analysis in this report we have therefore studied the extent to which social rented, intermediate housing and affordable rented housing can meet affordable housing need.

Current Affordable Housing Need

6.10 Current Affordable housing need is defined as the number of households who lack their own housing or who live in unsuitable housing and who cannot afford to meet their housing needs in the market. This is sometimes referred to as the ‘backlog’.

Newly-Arising Need

6.11 Newly-arising (or future) need is a measure of the number of households who are expected to have an affordable housing need at some point in the future. As per paragraph 25 of the PPG this is made up of newly forming households and existing households falling into need.

Supply of Affordable Housing

6.12 The supply of affordable housing is an estimate of the number of social/affordable rented and intermediate housing units likely to be available through relets of the current stock (based on past trend data).

Affordability

6.13 Affordability is assessed by comparing household incomes, based on income data modelled using a number of sources including CACI, Annual Survey of Hours and Earnings (ASHE), the English Housing Survey (EHS) and ONS data, against the cost of suitable market housing (to either buy or rent). Separate tests are applied for home ownership and private renting and are discussed later in this section.

- 6.14 It should be recognised that a key challenge in assessing affordable housing need using secondary sources is the lack of information available regarding households' existing savings. This is a key factor in affecting the ability of young households to purchase housing particularly in the current market context where a deposit of at least 10% is typically required for the more attractive mortgage deals. The 'help to buy' scheme is likely to be making some improvements in access to the owner-occupied sector although at present this is likely to be limited (although the impact of recent extensions to this scheme to include the second-hand market should be monitored moving forward). In many cases households who do not have sufficient savings to purchase have sufficient income to rent housing privately without support, and thus the impact of deposit issues on the overall assessment of affordable housing need is limited.

Local Prices & Rents

- 6.15 An important part of the SHMA is to establish the entry-level costs of housing to buy and rent – this data is then used in the assessment of the need for affordable housing. The affordable housing needs assessment compares prices and rents with the incomes of households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an 'affordable housing need.'
- 6.16 In this section we establish the entry-level costs of housing to both buy and rent across the study area. Our approach has been to analyse Land Registry and Valuation Office Agency (VOA) data to establish lower quartile prices and rents. For the purposes of analysis (and to be consistent with Paragraph 25 of the PPG (Reference ID: 2a-025-20140306)) we have taken lower quartile prices and rents to reflect the entry-level point into the market
- 6.17 The table below shows estimated lower quartile property prices by dwelling type. The data shows that entry-level costs to buy are estimated to start from about £55,000 for a flat in Preston and rising to nearly £200,000 for a detached home. Looking at the lower quartile price across all dwelling types the analysis shows a range from £85,000 in Preston, up to £115,000 in both Chorley and South Ribble.

Table 45: Lower quartile sales prices by type (year to March 2016)

	Flat	Terraced	Semi-detached	Detached	All dwellings
Chorley	£70,000	£85,000	£125,000	£190,000	£115,000
Preston	£55,000	£72,000	£120,000	£195,000	£85,000
South Ribble	£68,000	£86,000	£120,000	£181,000	£115,000

Source: Land Registry (2016)

- 6.18 A similar analysis has been carried out for private rents using Valuation Office Agency (VOA) data – this covers a 12-month period to March 2016. For the rental data information about dwelling sizes is provided (rather than types); the analysis shows an average lower quartile cost (across all dwelling sizes) of between £425 per month (in Preston), rising to £495 in South Ribble

Table 46: Lower quartile private rents by size and location (year to March 2016) – per month

	Room only	Studio	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms	All dwellings
Chorley	£347	£295	£375	£450	£525	£730	£450
Preston	£260	£350	£395	£475	£520	£650	£425
South Ribble	£450	£308	£380	£495	£560	£795	£495

Source: Valuation Office Agency (2016)

Income Required to Access Different Tenures of Housing

- 6.19 Having established the likely cost of housing, the next step is to estimate what level of income might be required to access the different products. Separate tests are applied for home ownership and private renting; home ownership is based on looking at mortgage multiples (mortgage affordability) with accessing private rented housing being based on consideration of the proportion of income that might need to be spent on housing (rental affordability).

Mortgage affordability

- 6.20 A household is considered able to afford to buy a home if it costs less than four times the gross household income; it has also been assumed that a household will have a 10% deposit.
- 6.21 Previous CLG guidance (of 2007) suggests using thresholds of 2.9× for households with multiple incomes and 3.5× for those with a single income. The use in this study of a four times multiple reflects the fact that there is likely to be some keenness from Government to ensure that prospective households are able to access the finance they need (for example, with the Help-to-Buy Scheme, the maximum income multiple is 4.5). Additionally, a brief review of a number of lenders indicates that four times income is generally available across the market; although the exact availability of finance will also depend on an individual household's circumstances.
- 6.22 It should be recognised that a key challenge in assessing affordable housing need using secondary sources is the lack of information available regarding households' existing savings. The 10% deposit is used to reflect the typical minimum deposit required to access mortgage finance. Deposit availability will vary by household and raising this sort of level of capital would potentially be an issue for a number of households. However, there are initiatives available to help households to raise a deposit (such as Help-to-Buy ISAs). In many cases households who do not have sufficient savings to purchase have sufficient income to rent housing privately without support, and thus the impact of deposit issues on the overall assessment of affordable housing need is limited.

Rental Affordability

- 6.23 A household is considered able to afford market rented housing in cases where the rent payable would constitute no more than a particular percentage of gross income. The choice of an appropriate threshold is an important aspect of the analysis, CLG guidance (of 2007) suggested

that 25% of income is a reasonable start point but also notes that a different figure could be used. Analysis of current letting practice suggests that letting agents typically work on a multiple of 40% (although this can vary by area). Government policy (through Housing Benefit payment thresholds) would also suggest a figure of 40%+ (depending on household characteristics).

- 6.24 The threshold of income to be spent on housing should be set by asking the question '*what level of income is expected to be required for a household to be able to access market housing without the need for a subsidy (e.g. through Housing Benefit)?*' The choice of an appropriate threshold will to some degree be arbitrary and will be linked to the cost of housing rather than income. Income levels are only relevant in determining the number (or proportion) of households who fail to meet the threshold. It would be feasible to find an area with very low incomes and therefore conclude that no households can afford housing, alternatively an area with very high incomes might show the opposite output. The key here is that local income levels are not setting the threshold, but are simply being used to assess how many can or can't afford market housing.
- 6.25 To look at a reasonable threshold in Central Lancashire a national benchmarking exercise has initially been carried out. Across the Country, evidence (from VOA) points to the cheapest areas having lower quartile rents of around £350 per month (this includes Liverpool, Hull and Leicester). It is assumed that these areas would have a 25% affordability threshold (i.e. the bottom end of the threshold range reflects the bottom end of the housing cost range).
- 6.26 The key point when looking at thresholds and housing costs is one of 'residual income' – i.e. the amount of money a household has after housing costs are paid for. Using the £350 pcm example, if a household spent 25% of income on housing then their residual income would be £1,050 per month, the same threshold in Chorley would show a residual income of £1,350 (i.e. 29% higher). Hence it is arguably not appropriate to use the same (25%) threshold in each area.
- 6.27 This analysis is not conclusive given that such an analysis would need to be predicated on a) an assumption that a 25% threshold is an appropriate benchmark at the bottom end of the market; b) that living costs (other than housing) are equal across areas and c) to note that the analysis is based on gross income (households with higher gross incomes would be expected to be paying more tax). It does however serve to show why the cost of housing is the key input into understanding a reasonable threshold for affordability.
- 6.28 Returning to the question for Central Lancashire, the analysis seeks to recognise residual income and also issues about tax and the cost of living. If it were assumed that the residual income (i.e. £1,050) should be held constant for all areas, then this would suggest a threshold in Chorley of 30%, however as noted keeping the residual income figure constant is probably not realistic. Hence, the analysis takes a simple average between the bottom line 25% and the 30% figure; this gives a threshold for affordability in Chorley of 27.5%; the equivalent figure for Preston is 26.9% and 28.5% in South Ribble.

Income thresholds for different tenures of housing

6.29 The table below brings together an analysis of the different tenures of housing to consider what level of income would indicatively be required to access. Although the measures for mortgage and rental affordability are different; both ultimately lead to an estimate of the income required. Looking at figures for the whole of the HMA it can be seen that it is estimated that an income of £19,100 to £25,900 would be required for open market purchase; a lower range of £19,000 to £20,800 is needed to access the private rented sector. The rental figures are therefore used when looking at the overall ability of households to access market housing.

Table 47: Affordability thresholds for different tenures of market housing – by local authority

	LQ purchase	LQ private rent
Chorley	£25,875	£19,636
Preston	£19,125	£18,954
South Ribble	£25,875	£20,828

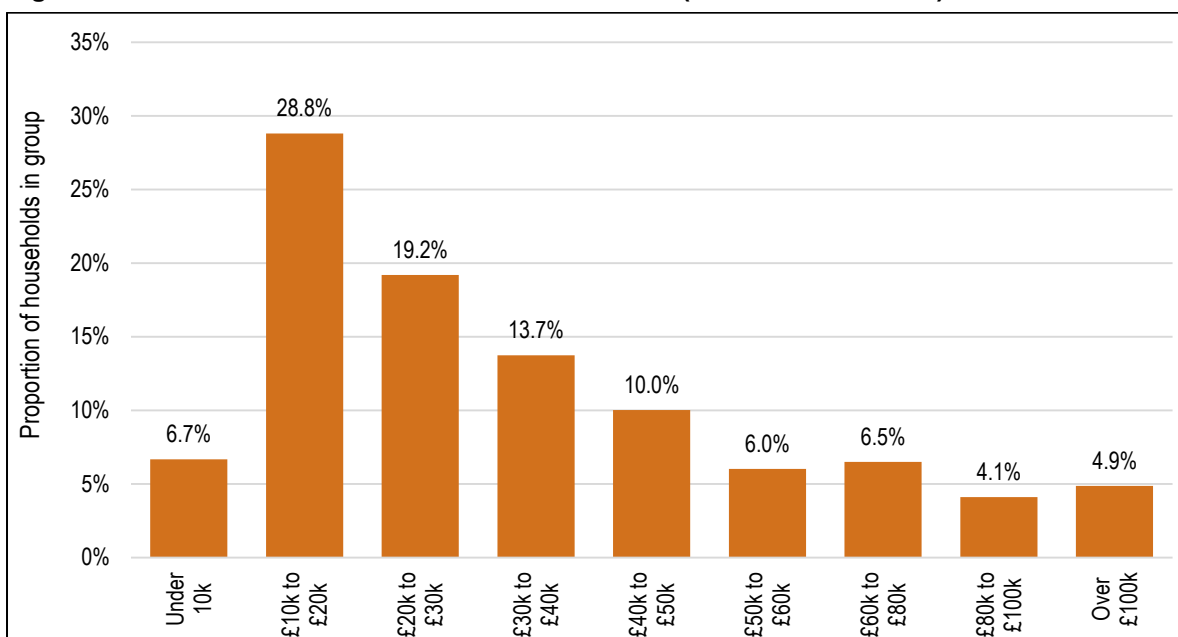
Source: Derived from a range of sources as described

Income levels and affordability

6.30 Following on from our assessment of local prices and rents it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability (i.e. the ability of a household to afford to buy or rent housing in the market without the need for some sort of subsidy); the analysis also provides an indication of the potential for intermediate housing to meet needs. Data about total household income has been modelled on the basis of a number of different sources of information to provide both an overall average income and the likely distribution of incomes in each area. The key sources of data include:

- ONS modelled income estimates (published in October 2015 with a 2011/12 base) – this information is provided for middle layer super output areas (MSOA) and is therefore used to build up to local authority areas
- English Housing Survey (EHS) – to provide information about the distribution of incomes
- Annual Survey of Hours and Earnings (ASHE) – to assist in looking at how incomes have changed since the ONS base date (regional figures have been used due to error margins associated with this source at a smaller area level)

6.31 Drawing all of this data together we have therefore been able to construct an income distribution for the whole of the study area for 2015. The figure below shows that around a third (35%) of households have incomes below £20,000 with a further third in the range of £20,000 to £40,000. The overall average (median) income of all households in the HMA was estimated to be around £27,300 with a mean income of £36,000.

Figure 39: Distribution of Household Income in HMA (mid-2015 estimates)

Source: Derived from ASHE, EHS and ONS data

- 6.32 The table below shows how income levels vary for each of the three local authorities. Incomes were found to be highest in South Ribble (very closely followed by Chorley) and lowest in Preston.

Table 48: Households income levels by local authority (mid-2015 estimates)

	Mean income	Median income
Chorley	£38,106	£28,983
Preston	£32,574	£24,775
South Ribble	£38,134	£29,004
Central Lancashire	£36,001	£27,279

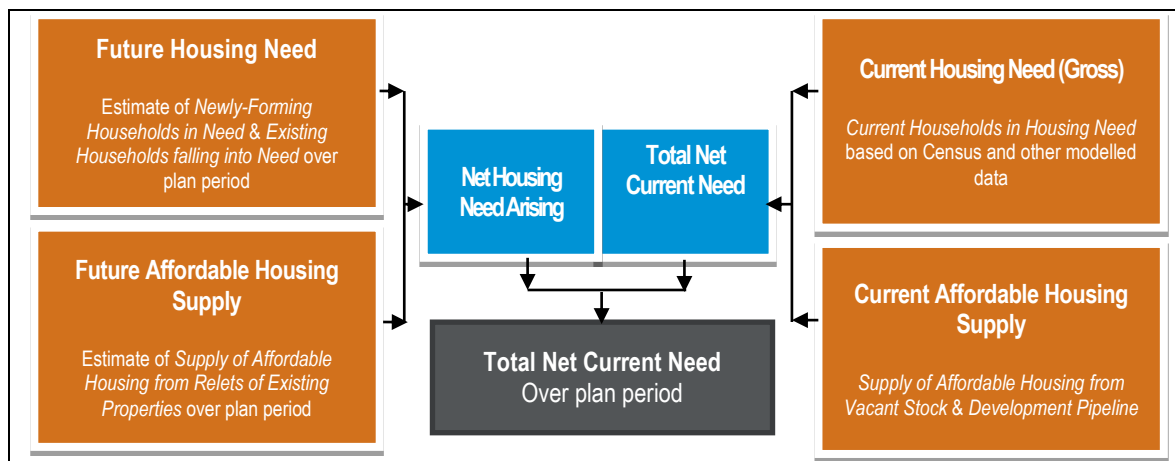
Source: Derived from ASHE, EHS and ONS data

- 6.33 To assess affordability, we have looked at household's ability to afford either home ownership or private rented housing (whichever is the cheapest), without financial support. The distribution of household incomes is then used to estimate the likely proportion of households who are unable to afford to meet their needs in the private sector without support, on the basis of existing incomes. This analysis brings together the data on household incomes with the estimated incomes required to access private sector housing.
- 6.34 Different affordability tests are applied to different parts of the analysis depending on the group being studied (e.g. recognising that newly forming households are likely on average to have lower incomes than existing households (this has consistently been shown to be the case in the English Housing Survey and the Survey of English Housing)). Assumptions about income levels for specific elements of the modelling are discussed where relevant in the analysis that follows.

Affordable Housing Needs Assessment

- 6.35 Affordable housing need has been assessed using the methodology set out in the PPG. This model is summarised in the figure below.

Figure 40: Overview of Affordable Housing Needs Assessment Model



- 6.36 The figures presented in this report for affordable housing needs have been based on secondary data sources including analysis of 2011 Census. The modelling undertaken provides an assessment of affordable housing need for a 20-year period – 2014-34 (which is then annualised) although it should be recognised that much of the base data (e.g. about incomes and housing costs) has a mid-2015 base date. Each of the stages of the affordable housing needs model calculation are discussed in more detail below.

Methodological Issues

- 6.37 Due to the analysis being based on secondary data sources only, there are a number of assumptions that need to be made to ensure that the analysis is as robust as possible. Key assumptions include considering the number of households who have a need due to issues such as insecure tenancies or housing costs – such households form part of the affordable need as set out in guidance (see paragraph 2a-023 of the PPG for example) but are not readily captured from secondary data sources. Assumptions also need to be made about the likely income levels of different groups of the population (such as newly forming households), recognising that such households' incomes may differ from those in the general population.
- 6.38 To overcome the limitations of a secondary-data-only assessment, additional data has been taken from a range of survey-based affordable needs assessments carried out by GL Hearn. These surveys (which cover a range of areas and time periods) allow the assessment to consider issues such as needs which are not picked up in published sources and different income levels for different household groups. This data is then applied to actual data for the study area (e.g. from the Census) as appropriate. It is the case that outputs from surveys in other areas show remarkably similar outputs to each other for a range of core variables (for example the income levels of newly forming

households when compared with existing households) and are therefore likely to be fairly reflective of the situation locally. Where possible, data has also been drawn from national surveys (notably the English Housing Survey (over a number of years)).

6.39 It should also be stressed that the secondary data approach is consistent with the PPG. Specifically, paragraph 14 (ID: 2a-014-20140306) states that:

'Plan makers should avoid expending significant resources on primary research (information that is collected through surveys, focus groups or interviews etc. and analysed to produce a new set of findings) as this will in many cases be a disproportionate way of establishing an evidence base. They should instead look to rely predominantly on secondary data (e.g. Census, national surveys) to inform their assessment which are identified within the guidance.'

6.40 CLG Guidance also suggests that the housing register can be used to estimate levels of affordable housing need. Our experience of working across the country is that housing registers can be highly variable in the way their allocation policies and points systems work. This means that in many areas it is difficult to have confidence that the register is able to define an underlying need. Many housing registers include households who might not have a need whilst there will be households in need who do not register (possibly due to being aware that they have little chance of being housed). For these reasons, the method linked to a range of secondary data sources is preferred.

Current Affordable Housing Need

6.41 In line with PPG paragraph 17 (ID: 2a-017-20140306), the current need for affordable housing has been based on considering the likely number of households with one or more housing problems. A list is initially set out in paragraph 23 (ID: 2a-023-20140306) of the PPG and provides the following.

What types of households are considered in affordable housing need?

The types of households to be considered in housing need are:

- homeless households or insecure tenure (e.g. housing that is too expensive compared to disposable income);
- households where there is a mismatch between the housing needed and the actual dwelling (e.g. overcrowded households);
- households containing people with social or physical impairment or other specific needs living in unsuitable dwellings (e.g. accessed via steps) which cannot be made suitable in-situ
- households that lack basic facilities (e.g. a bathroom or kitchen) and those subject to major disrepair or that are unfit for habitation;
- households containing people with particular social needs (e.g. escaping harassment) which cannot be resolved except through a move.

Source: PPG [ID 2a-023-20140306]

- 6.42 This list of potential households in need is then expanded on in paragraph 24 (ID: 2a-024-20140306) of the PPG which provides a list of the categories to consider when assessing current need. This assessment seeks to follow this list by drawing on a number of different data sources. The table below sets out the data used in each part of the assessment.

Table 49: Main sources for assessing the current unmet need for affordable housing

	Source	Notes
Homeless households	CLG Live Table 784	Total where a duty is owed but no accommodation has been secured PLUS the total in temporary accommodation
Households in overcrowded housing	Census table LC4108EW	Analysis undertaken by tenure
Concealed households	Census table LC1110EW	Number of concealed families (with dependent or non-dependent children)
Existing affordable housing tenants in need	Modelled data linking to past survey analysis	Will include households with many of the issues in the first box above (e.g. insecure tenure)
Households from other tenures in need	Modelled data linking to past survey analysis	

Source: PPG [ID 2a-024-20140306]

- 6.43 It should be noted that there may be some overlap between categories (such as overcrowding and concealed households, whereby the overcrowding would be remedied if the concealed household moved). The data available does not enable analysis to be undertaken to study the impact of this and so it is possible that the figures presented include a small element of double counting. Additionally, some of the concealed households may be older people who have moved back in with their families and might not be considered as in need.
- 6.44 The table below shows the initial estimate of the number of households within the HMA with a current housing need. These figures are before any consideration of affordability has been made and has been termed 'the number of households in unsuitable housing'. Overall, the analysis suggests that there are currently some 8,900 households living in unsuitable housing (or without housing) – around half of these households currently live in Preston.

Table 50: Estimated number of households living in unsuitable housing

Category of 'need'	Households
Homeless households	66
Households in overcrowded housing	4,429
Concealed households	953
Existing affordable housing tenants in need	455
Households from other tenures in need	2,992
Total	8,895

Source: CLG Live Tales, Census (2011) and data modelling

Table 51: Estimated number of households living in unsuitable housing (by local authority)

	Homeless	Over-crowded	Concealed	AH tenants	Other tenures	Total
Chorley	12	948	176	122	816	2,075
Preston	28	2,560	502	231	1,357	4,678
South Ribble	26	921	275	101	819	2,142
Central Lancashire	66	4,429	953	455	2,992	8,895

Source: CLG Live Tales, Census (2011) and data modelling

- 6.45 In taking this estimate forward, the data modelling estimates housing unsuitability by tenure. From the overall number in unsuitable housing, households living in affordable housing are excluded (as these households would release a dwelling on moving and so no net need for affordable housing will arise). The analysis also excludes 90% of owner-occupiers under the assumption (which is supported by analysis of survey data) that the vast majority of owner-occupier households will be able to afford housing once savings and equity are taken into account.
- 6.46 A final adjustment is to slightly reduce the unsuitability figures in the private rented sector to take account of student-only households – such households could technically be overcrowded/living in unsuitable housing but would be unlikely to be considered as being in affordable housing need (student households rarely qualify for affordable housing). Once these households are removed from the analysis, the remainder are taken forward for affordability testing.
- 6.47 The table below shows it is estimated that there were 14,385 households living in unsuitable housing (excluding current social tenants and the majority (90%) of owner-occupiers).

Table 52: Unsuitable housing by tenure and numbers to take forward into affordability modelling

	In unsuitable housing	Number to take forward for affordability testing
Owner-occupied	3,188	319
Affordable housing	1,879	0
Private rented	2,809	2,680
No housing (homeless/concealed)	1,019	1,019
Total	8,895	4,018

Source: CLG Live Tales, Census (2011) and data modelling

- 6.48 Having established this figure, it needs to be considered that a number of these households might be able to afford market housing without the need for subsidy. For an affordability test the income data has been used, with the distribution adjusted to reflect a lower average income amongst households living in unsuitable housing – for the purposes of the modelling an income distribution that reduces the level of income to 69% of the figure for all households has been used to identify the proportion of households whose needs could not be met within the market (for households currently living in housing). A lower figure (of 42%) has been used to apply an affordability test for the concealed/homeless households who do not currently occupy housing.

- 6.49 These two percentage figures have been based on a consideration of typical income levels of households who are in unsuitable housing (and excluding social tenants and the majority of owners) along with typical income levels of households accessing social rented housing (for those without accommodation). These figures are considered to be best estimates, and likely to approximately reflect the differing income levels of different groups with a current housing problem.
- 6.50 Overall, around three-fifths of households with a current need are estimated to be likely to have insufficient income to afford market housing and so the estimate of the total current need is reduced to 2,375 households in the HMA. The table below shows how current need is estimated to vary across local authorities.

Table 53: Estimated Current Affordable Housing Need

	In unsuitable housing (taken forward for affordability test)	% Unable to Afford Market Housing (without subsidy)	Revised Gross Need (including Affordability)
Chorley	893	54.1%	483
Preston	2,163	61.0%	1,320
South Ribble	962	59.5%	572
Central Lancashire	4,018	59.1%	2,375

Source: CLG Live Tales, Census (2011), data modelling and affordability analysis

Newly-Arising Affordable Housing Need

- 6.51 To estimate newly-arising (projected future) need we have looked at two key groups of households based on the PPG. These are:
- Newly forming households; and
 - Existing households falling into need.

Newly-Forming Households

- 6.52 The number of newly-forming households has been estimated through the demographic modelling with an affordability test also being applied. This has been undertaken by considering the changes in households in specific 5-year age bands relative to numbers in the age band below 5 years previously to provide an estimate of gross household formation (e.g. the analysis considers the number of households aged under 45 in a particular year and subtracts the number aged under 40 five-years previously – this provides an indication of the number of new household (i.e. that didn't exist five years earlier). This differs from numbers presented in the demographic projections which are for net household growth.
- 6.53 The numbers of newly-forming households are limited to households forming who are aged under 45 – this is consistent with CLG guidance (from 2007 – see Annex B) which notes after age 45 that headship (household formation) rates 'plateau'. The PPG does not provide any specific guidance on how to calculate the number of newly forming households. There may be a small number of

household formations beyond age 45 (e.g. due to relationship breakdown) although the number is expected to be fairly small when compared with formation of younger households.

- 6.54 The estimates of gross new household formation have been based on outputs from our core demographic projection (15-year migration trends). In looking at the likely affordability of newly-forming households we have drawn on data from previous surveys. This establishes that the average income of newly-forming households is around 84% of the figure for all households. This figure is remarkably consistent across all areas (and is also consistent with analysis of English Housing Survey data at a national level analysed over a number of years).
- 6.55 We have therefore adjusted the overall household income data to reflect the lower average income for newly-forming households. The adjustments have been made by changing the distribution of income by bands such that average income level is 84% of the all household average. In doing this we are able to calculate the proportion of households unable to afford market housing without any form of subsidy (such as LHA/HB). The assessment suggests that overall around two-fifths of newly-forming households will be unable to afford market housing and that a total of 1,232 new households will have an affordable need on average in each year to 2034 in the HMA.

Table 54: Estimated Level of Affordable Housing Need from Newly Forming Households (per annum)

	Number of new households	% unable to afford market housing without subsidy	Total in need
Chorley	869	39.8%	345
Preston	1,169	45.4%	530
South Ribble	840	42.4%	356
Central Lancashire	2,879	42.8%	1,232

Source: Projection Modelling/Income analysis

Existing Households falling into Affordable Housing Need

- 6.56 The second element of newly arising need is existing households falling into need. To assess this, we have used information from CoRe. We have looked at households who have been housed over the past three years (2012-15) – this group represents the flow of households onto the Housing Register over this period. From this we have discounted any newly forming households (e.g. those currently living with family) as well as households who have transferred from another affordable property. An affordability test has also been applied, although relatively few households are estimated to have sufficient income to afford market housing.
- 6.57 This method for assessing existing households falling into need (in the absence of any guidance in the PPG) is consistent with the 2007 SHMA Guidance which says on page 46 that *‘Partnerships should estimate the number of existing households falling into need each year by looking at recent trends. This should include households who have entered the housing register and been housed*

within the year as well as households housed outside of the register (such as priority homeless household applicants)'.

- 6.58 As shown in the table below, following the analysis through suggests a need arising from 893 existing households each year across the study area, with approaching half of these being in Preston.

Table 55: Estimated level of Housing Need from Existing Households (per annum)

	Number of Existing Households falling into Need	% of Existing Households falling into Need
Chorley	275	30.8%
Preston	399	44.7%
South Ribble	218	24.5%
Central Lancashire	893	100.0%

Source: CoRe/affordability analysis

Supply of Affordable Housing

- 6.59 The future supply of affordable housing is the flow of affordable housing arising from the existing stock that is available to meet future need. It is split between the annual supply of social/affordable rent relets and the annual supply of relets/sales within the intermediate sector.
- 6.60 The PPG paragraph 27 (ID: 2a-027-20140306) suggests that the estimate of likely future relets from the social rented stock should be based on past trend data which can be taken as a prediction for the future. We have used information from the Continuous Recording system (CoRe) to establish past patterns of social housing turnover. Our figures include general needs and supported lettings but exclude lettings of new properties plus an estimate of the number of transfers from other social rented homes. These exclusions are made to ensure that the figures presented reflect relets from the existing stock.
- 6.61 On the basis of past trend data it has been estimated that 1,596 units of social/affordable rented housing are likely to become available each year moving forward, with a notably higher proportion of these being in Preston.

Table 56: Analysis of past social/affordable rented housing supply (per annum – based on data for the 2013-16 period)

	Total lettings	% as non-new-build	Lettings in existing stock	% non-transfers	Total lettings to new tenants
Chorley	857	89.2%	765	63.9%	488
Preston	1,448	93.9%	1,359	55.3%	751
South Ribble	636	90.4%	575	62.1%	357
Central Lancashire	2,941	91.7%	2,698	59.2%	1,596

Source: CoRe (2012-15)

- 6.62 The supply figure is for social/affordable rented housing only and whilst the stock of intermediate housing in the study area is not significant compared to the social/affordable rented stock it is likely that some housing does become available each year (e.g. re-sales of shared ownership).
- 6.63 For the purposes of this assessment we have again utilised CoRe data about the number of sales of homes that were not new-build. From this it is estimated that around 27 additional properties might become available per annum. The total supply of affordable housing is therefore estimated to be 1,623 per annum across the HMA.

Table 57: Supply of affordable housing

	Social/affordable rented relets	Intermediate housing 'relets'	Total supply (per annum)
Chorley	488	10	498
Preston	751	6	757
South Ribble	357	11	368
Central Lancashire	1,596	27	1,623

Source: CoRe (2012-15)

Net Affordable Housing Need

- 6.64 The table below shows our overall calculation of affordable housing need. This excludes supply arising from sites with planning permission (the 'development pipeline') to allow for a comparison with the demographic projections set out in the report. The analysis has been based on meeting affordable housing need over the 20-year period from 2014 to 2034. Whilst most of the data in the model are annual figures the current need has been divided by 20 to make an equivalent annual figure.
- 6.65 As the table sets the analysis calculates an overall need for affordable housing of 12,400 units over the 20-years to 2034 (620 per annum) across the HMA. The net need is calculated as follows:

$$\text{Net Need} = \text{Current Need} + \text{Need from Newly-Forming Households} + \text{Existing Households falling into Need} - \text{Supply of Affordable Housing}$$

Table 58: Estimated level of Affordable Housing Need (2014-34) – HMA

	Per annum	2014-34
Current need	119	2,375
Newly forming households	1,232	24,631
Existing households falling into need	893	17,860
Total Gross Need	2,243	44,866
Supply from existing stock	1,623	32,464
Net Need	620	12,402

Source: Census (2011)/CoRe/Projection Modelling and affordability analysis

6.66 The table below shows the annualised information for each local authority. The analysis shows a need for additional affordable housing in all areas.

Table 59: Estimated level of Affordable Housing Need per annum – by HMA and local authority

	Current need	Newly forming households	Existing households falling into need	Total Need	Supply from existing stock	Net Need
Chorley	24	345	275	645	498	146
Preston	66	530	399	996	757	239
South Ribble	29	356	218	603	368	235
Central Lancashire	119	1,232	893	2,243	1,623	620

Source: 2011 Census/CoRe/Projection Modelling and affordability analysis

Relating Affordable Need and OAN – Legal Judgments

6.67 The analysis above clearly indicates a need for affordable housing across the HMA. However, the link between affordable need and the OAN is complex and has been subject to a number of recent High Court decisions. Below some of the key judgments and guidance have been summarised in Chronological Order.

Satnam Millennium Limited v Warrington Borough Council (February 2015)

6.68 In this case, a challenge to the adoption of the Warrington Local Plan Core Strategy succeeded, resulting in the quashing of the Plan's housing provision policies. With regard to affordable housing the judge found that the assessment of full, objectively assessed needs for housing had not taken account of the (substantial) need for affordable housing.

6.69 In paragraph 43 of the judgement it is concluded that 'the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in the NPPF, paragraphs 14 and 47'. This quote has been taken by some parties to imply that the need for affordable housing (as shown in modelling such as within the section) needs to be met in full – for example, if the affordable need is 200 per annum and delivery is likely to be 20% then an OAN for 1,000 homes would be appropriate.

6.70 It is not clear if this is exactly what the judge in this case had in mind. What is clear that such an approach in many areas would be impractical as it would require huge increases to have any significant impact.

Oadby and Wigston v Bloor Homes (July 2015)

6.71 In this case, a challenge by Oadby & Wigston Borough Council to the granting of planning permission through a Section 78 inquiry was dismissed.

- 6.72 The key issue in front of the Judge was whether or not the original inspector's adoption of a figure of 147 dwellings per annum as the full objectively assessed need for housing (FOAN) was sound. In essence the Council's position was that the need was in the range of 80-100 dwellings per annum and that this was a policy-off figure based on the most up-to-date population and household projections. The appellant suggested a need in the range of 147-161 based on long-term migration trends and the needs of the local economy (in terms of matching job growth and housing need).
- 6.73 The Judge's initial conclusion was that he considered the SHMA position (of 80-100 dwellings per annum) to be policy-on. He based this on a recognition that other analysis in the SHMA had indicated a need for 173 dpa to meet economic growth and a slightly lower figure (of 160 per annum) as the affordable housing need.
- 6.74 The uncertainty in this decision is whether or not the FOAN must include all of the affordable housing need. Some of the wording of the judgment would suggest that this was the case with Judge Hickinbottom stating that the assessment of need 'becomes policy on as soon as the Council takes a course of not providing sufficient affordable housing to satisfy the FOAN'. This however is inconsistent with the more recent judgement in Kings Lynn (below) and also contrasts with the approach recommended in the PAS Technical Advice Note.

Kings Lynn v Elm Park Holdings (July 2015)

- 6.75 The final case of reference is Kings Lynn and West Norfolk Council vs. SSCLG and Elm Park Holdings. The case involved the Council's challenge to an inspector's granting of permission for 40 dwellings in a village. Although much of the case was about the approach to take with regards to vacant and second homes, the issue of affordable housing was also a key part of the final judgment.
- 6.76 Focussing on affordable housing, Justice Dove considered the "ingredients" involved in making a FOAN and noted that the FOAN is the product of the Strategic Housing Market Assessment (SHMA) required by paragraph 159 of the NPPF. It is noted that the SHMA must identify the scale and mix of housing to meet household and population projections, taking account of migration and demographic change, and then address the need for all housing types, including affordable homes.
- 6.77 He continued by noting that the scale and mix of housing is '*a statistical exercise involving a range of relevant data for which there is no one set methodology, but which will involve elements of judgement*'. Crucially, in paragraph 35 of the judgment he says that the '*Framework makes clear that these needs [affordable housing needs] should be addressed in determining the FOAN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice*'. This is an important point, given the previous judgements in Satnam and Oadby & Wigston. And indeed in relation to Oadby and Wigston he notes that '*Insofar as Hickinbottom J in*

the case of Oadby and Wigston Borough Council v Secretary of State [2015] EWHC 1879 might be taken in paragraph 34(ii) of his judgment to be suggesting that in determining the FOAN, the total need for affordable housing must be met in full by its inclusion in the FOAN I would respectfully disagree. Such a suggestion is not warranted by the Framework or the PPG’.

- 6.78 Therefore, this most recent judgement is clear that an assessment of affordable housing need should be carried out, but that the level of affordable need shown by analysis does not have to be met in full within the assessment of the FOAN. It does however have to be a material consideration when setting the OAN.
- 6.79 The approach in Kings Lynn is also similar to that taken by the inspector (Simon Emerson) to the Cornwall Local Plan. His preliminary findings in June 2015 noted in paragraph 3.20 that *‘National guidance requires consideration of an uplift; it does not automatically require a mechanistic increase in the overall housing requirement to achieve all affordable housing needs based on the proportions required from market sites.’*

Legal judgments – Conclusions

- 6.80 The various legal judgments above are useful background. However, the main concern is that none of these really seek to understand exactly how affordable housing sits within estimates of the overall need for housing – this is a significant shortcoming.
- 6.81 However, in line with the Kings Lynn judgement the affordable housing need should still be a consideration when setting the OAN. Given the inter-relationship with market signals, there is some basis for considering market signals and affordable housing alongside each other in considering adjustments within an OAN calculation.

Planning Advisory Service – Technical Advice Note (July 2015)

- 6.82 At about the same time as the Oadby & Wigston judgement, the Planning Advisory Service (PAS) published the second edition of their technical advice note on Objectively Assessed Need and Housing Targets – this replaced/updated a version from June 2014 – this also looks at affordable housing.
- 6.83 The consideration of affordable housing need and its relationship to overall housing need is covered in some detail within Section 9 of the document. PAS set out a suggested approach for looking at the relationship between OAN and affordable housing (which is broadly in line with the approach in this report) before going on to consider their own view about the relationship.
- 6.84 They initially suggest that affordable housing is “a policy consideration” that bears on housing targets rather than OAN and note that they are not comparable because they relate to different meanings of the term “need.” They also highlight that the OAN relates to new dwellings whereas

much of the affordable need relates to existing households, who, when moving, would free up dwellings to be occupied by other households.

- 6.85 PAS conclude that there is no arithmetical way of combining the OAN (calculated through demographic projections) and the affordable need before concluding that the affordable need cannot be a component part of the OAN. PAS do however note that their views 'may be' contradicted by the Satnam judgement referred to above, and *Kings Lynn*.

Relating Affordable Need and OAN

- 6.86 On one level, the PAS view looks to be entirely sensible. When the components of need are looked at it is clear that the relationship between affordable housing and overall housing need is complex. Firstly, the modelling contains a category in the projection of 'existing households falling into need'; these households already have accommodation and hence if they were to move to alternative accommodation, they would release a dwelling for use by another household – there is no net need to provide additional homes. The modelling also contains 'newly forming households'; these households are a direct output from the demographic modelling and are therefore already included in the overall housing need figures.

- 6.87 This just leaves the 'current need'; much of this group will be similar to the existing households already described (in that they are already living in accommodation) although it is possible that a small number will be households without housing (mainly concealed households).

- 6.88 Overall the above analysis above does however indicate a clear need for affordable housing. The Planning Practice Guidance sets out how it expects the affordable housing need to be considered as part of the plan-making process. It outlines in Paragraph 029 that:

"The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes."

- 6.89 Core Strategy Policy 7 seeks 35% affordable housing in rural areas and sites adjoining villages over a 5 dwelling/ 0.15 ha threshold; and 30% on sites within/ adjoining urban areas over a 15 dwelling/ 0.5 ha threshold. 100% affordable housing delivery is envisaged on rural exception sites. Given the Core Strategy's focus of growth within/ adjoining urban areas, GL Hearn notionally assumed 30% of housing is delivered as affordable housing, and the table below considers the overall housing provision which would in theoretically be required on this basis.

- 6.90 The affordable needs evidence provides some basis for considering an upward adjustment from the starting point demographic need. In theory 2,067 dwellings pa would be required to deliver the affordable housing need across the HMA in full. This is 121% above the level of housing need shown in the 2014-based household projections (934 dpa) and a level of housing provision which

GL Hearn does not consider to be realistically achievable. The market would not support this level of provision, not is it a level of housing provision which is necessarily required when the affordable housing need is considered in context.

Table 60: Notional Housing Provision to Deliver Affordable Need in Full

	Affordable Need pa	Assumed % Affordable Delivery	Notional Overall Provision to Meet Affordable Need in Full	15 Year Migration Demographic Need
Chorley	146	30%	487	419
Preston	239	30%	797	402
South Ribble	235	30%	783	351
HMA	620	30%	2067	1171

- 6.91 It should be borne in mind that any adjustments from the demographic starting point within an OAN calculation will deliver additional market and affordable housing.
- 6.92 Additionally, if the Councils were to increase planned housing figures, then this would generate increased migration and population growth, which would mean a lower level in other areas (and hence other locations would logically be expected to plan for fewer dwellings).
- 6.93 As it is, the identified affordable housing need across the HMA of 620 per annum comprises around half of the 1,171-1,184 dpa need resulting from either the demographic or economic based scenarios. The affordable housing need thus provides a supporting justification for planning within this range. There is no evidence that higher provision than thus could be supported by the market.
- 6.94 Given the level of affordable housing need, the Councils should however seek to maximise delivery where possible and it should be borne in mind that besides delivery of affordable housing on mixed-tenure development schemes, there are a number of other mechanisms which deliver affordable housing. These include:
- National Affordable Housing Programme – this (administered by the HCA) provides funding to support Registered Providers in delivering new housing including on sites owned by RPs;
 - Building Council Homes – following reform of the HRA funding system, Councils can bring forward affordable housing themselves;
 - Empty Homes Programmes – where local authorities can bring properties back into use as affordable housing. These are existing properties, and thus represent a change in tenure within the current housing stock;
 - Rural Exception Site Development – where the emphasis is on delivering affordable housing to meet local needs.
- 6.95 Funding for specialist forms of affordable housing, such as extra care provision, may also be available from other sources; whilst other niche agents, such as Community Land Trusts, may deliver new affordable housing. Net changes in affordable housing stock may also be influenced by estate regeneration schemes, as well as potentially by factors such as the proposed extension of the Right to Buy to housing association properties. Affordable housing can be met by changes in the ownership of existing housing stock, not just by new-build development.

- 6.96 The discussion above has already noted that the need for affordable housing does not generally lead to a need to increase overall provision (with the exception of potentially providing housing for concealed households). It is however worth briefly thinking about how affordable need works in practice and the housing available to those unable to access market housing without Housing Benefit. In particular, the increasing role played by the Private Rented Sector (PRS) in providing housing for households who require financial support in meeting their housing needs should be recognised.
- 6.97 Whilst the Private Rented Sector (PRS) does not fall within the types of affordable housing set out in the NPPF 'for planning purposes', it has evidently been playing a role in meeting the needs of households who require financial support in meeting their housing need. Government recognises this, and indeed legislated through the 2011 Localism Act to allow Councils to discharge their "homelessness duty" through providing an offer of a suitable property in the PRS.
- 6.98 It is also worth reflecting on the NPPF (Annex 2) definition of affordable housing. This says: 'Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market' [emphasis added]. Clearly where a household is able to access suitable housing in the private rented sector (with or without Housing Benefit) it is the case that these needs are being met by the market (as within the NPPF definition). As such the role played by the private rented sector should be recognised – it is evidently part of the functioning housing market.
- 6.99 Data from the Department of Work and Pensions (DWP) has been used to look at the number of Housing Benefit supported private rented homes. As of May 2016 it is estimated that there were around 6,800 benefit claimants in the private rented sector in Central Lancashire (1,761 in Chorley, 2,485 in Preston and 1,539 in South Ribble) – this serves to illustrate that there is some flexibility within the wider housing market.
- 6.100 However, national planning policy does not specifically seek to meet the needs identified through the Needs Assessment Model in the Private Rented Sector. Government's benefit caps may reduce the contribution which this sector plays in providing a housing supply which meets the needs of households identified in the affordable housing needs model. In particular future growth in households living within the PRS and claiming LHA cannot be guaranteed.

Need for Different Types of Affordable Housing

- 6.101 Having studied housing costs, incomes and affordable housing need the next step is to make an estimate of the proportion of affordable housing need that should be met through provision of different housing products. We therefore use the income information presented earlier in this section to estimate the proportion of households who are likely to be able to afford intermediate

housing and the number for whom only social or affordable rented housing will be affordable. There are three main types of affordable housing that can be studied in this analysis:

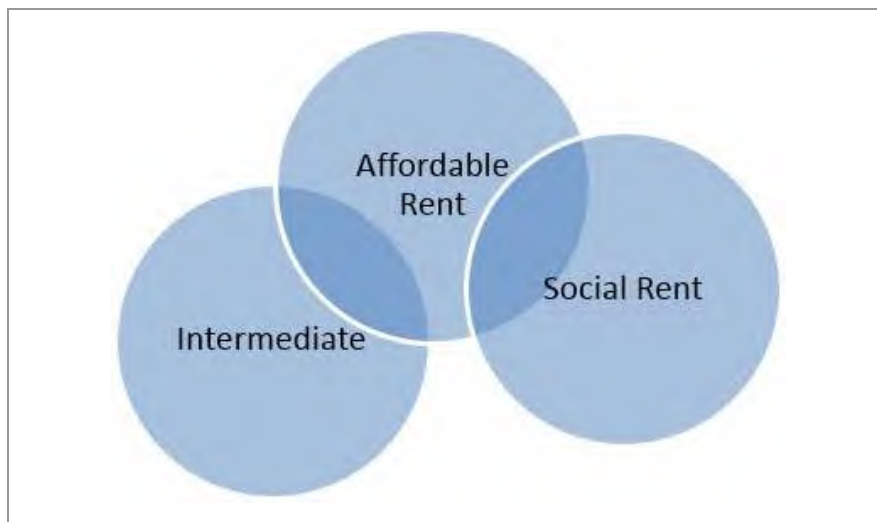
- Intermediate
- Affordable rent
- Social rent

6.102 Whilst the process of separating households into different income bands for analytical purposes is quite straightforward, this does not necessarily tell us what sort of affordable housing they might be able to afford or occupy.

6.103 For example, a household with an income close to being able to afford market housing might be able to afford intermediate or affordable rent but may be prevented from accessing certain intermediate products (such as shared ownership) as they have an insufficient savings to cover a deposit. Such a household might therefore be allocated to affordable rented or intermediate rented housing as the most suitable solution.

6.104 The distinction between social and affordable rented housing is also complex. Whilst rents for affordable rented housing would be expected to be higher than social rents, this does not necessarily mean that such a product would be reserved for households with a higher income. In reality, as long as the rent to be paid falls at or below LHA limits then it will be accessible to a range of households (many of whom will need to claim housing benefit). Local authorities' tenancy strategies might set policies regarding the types of households which might be allocated affordable rented homes; and many authorities will seek to avoid where possible households having to claim higher levels of housing benefit. This however needs to be set against other factors, including viability and the availability of grant funding. Over the spending period to 2021 grant funding is primarily available to support delivery of shared ownership. A significant level of affordable housing delivery is however through developer contributions (Section 106 Agreements).

6.105 For these reasons it is difficult to exactly pin down what proportion of additional affordable homes should be provided through different affordable tenure categories. In effect there is a degree of overlap between different affordable housing tenures, as the figure below shows.

Figure 41: Overlap between Affordable Housing Tenures

6.106 Given this overlap, for analytical purposes we have defined the following categories:

- Households who can afford 80% or more of market rent levels;
- Households who would potentially be able to afford more than existing social rent levels but could not afford 80% of market rents;
- Households who can afford no more than existing social rent levels (or would require housing benefit or an increased level of housing benefit to do so).

6.107 The first of these categories would include equity-based intermediate products such as shared ownership and shared equity homes. The latter two categories are both rented housing and in reality can be considered together (both likely to be provided by Registered Providers (or the Council) with some degree of subsidy). Additionally, both affordable rented and social rented housing is likely to be targeted at the same group of households; many of whom will be claiming Housing Benefit. For this reason, the last two categories are considered together for the purposes of drawing conclusions.

6.108 Detailed information on households' savings is not readily available. For the purposes of the analysis of affordability it has been assumed that all households with an income which would allow them to afford 80% or more of market rents would represent the potential market for equity-based intermediate products such as shared ownership and shared equity homes with the remainder needing a rented product.

6.109 When working the above assumptions through the affordability models developed in the affordable needs analysis it is estimated that around an eighth of households would be able to afford a product priced at 80% of the market cost.

Table 61: Gross need for Intermediate and affordable/social rented housing

Component of need (all per annum)	Intermediate housing	Social/ Affordable rented	TOTAL
Current need	14	105	119
Newly forming households	179	1,052	1,232
Existing households falling into need	76	817	893
Total	269	1,975	2,243
Percentage of total	12%	88%	100%

Source: Affordable Housing Needs Analysis

6.110 However, the figures in the table above should not be directly taken to be the proportion of housing that should be provided as intermediate. There are two factors which need to be considered and these are described below:

- Savings and or access to a deposit – as noted, there is no information about household savings and their ability to afford an equity-based intermediate product. In reality, many households with a modest income may not be able to afford intermediate housing due to this factor. For this reason, the figures presented in the table above are arguably too high;
- Supply of intermediate housing – however, the current supply of affordable housing also needs to be considered. As previous analysis has shown, the vast majority of the affordable housing stock and relets is in the social/affordable rented category with only a modest supply of intermediate housing. Therefore, it is arguable that a higher proportion of intermediate housing would be needed due to this imbalance.

6.111 As can be seen these two factors suggest that the need is either higher or lower than presented in the table above. Given this, it is suggested that a prudent response would be to consider the figures in the table as being broadly reflective of the need for intermediate products. Given the range of figures the following is suggested as a reasonable tenure mix for affordable housing across the HMA:

- 10-15% - intermediate housing
- 85-90% - social and affordable rented housing

6.112 The table below shows a summary of the same information for each local authority. This shows relatively little difference between location, with all areas suggesting that around an eighth of housing should be intermediate and the remaining being some form of rented product.

Table 62: Gross need for Intermediate and affordable/social rented housing – by local authority

	Intermediate housing	Social/ Affordable rented	TOTAL
Chorley	13%	87%	100%
Preston	11%	89%	100%
South Ribble	12%	88%	100%
Central Lancashire	12%	88%	100%

Source: Affordable Housing Needs Analysis

6.113 In determining policies for affordable housing provision on individual sites, the analysis in the table above should be brought together with other local evidence such as from the Housing Register. Consideration could also be given to areas with high concentrations of social rented housing where additional intermediate housing might be desirable to improve the housing mix and to create 'housing pathways'.

Housing and Planning Bill

6.114 In October 2015, the Government published the Housing and Planning Bill 2015-16 (this received Royal Assent as the Housing and Planning Act 2016 on the 12th May 2016). This set out a number of government initiatives which are likely to directly influence the supply and demand for housing and affordable housing. The key change looks likely to be the introduction of Starter Homes and analysis of this topic is provided in the following section.

6.115 There were also a number of other initiatives which may impact on the supply and demand for general and affordable homes, although the full impact is yet to be understood. These include:

- **A requirement for social/affordable rents to be reduced by 1% for four years from April 2016.** The likely impact of this will be to reduce income for both the local authorities (which have housing stock) and housing associations. This in turn may reduce the LA or RP reinvestment funding/borrowing power and may subsequently reduce the development of new affordable homes.
- **The extension of the Right to Buy to RP tenants.** Although not enforceable this could reduce affordable housing stock and reduce thus the number of re-lets. Research by Joseph Rowntree Foundation predicts that nationally 8.3% of housing association tenants will be eligible for and could afford the RTB, and that 71% of those will purchase their home over the first five years.
- **Local authorities to sell high value social housing stock as it becomes vacant.** Whilst the detail of this has yet to be confirmed this is will reduce the number of available properties which are available for re-lets each year. Higher value areas will be impacted most although it may provide additional funding for smaller affordable properties.
- **Capping social housing rents at Local Housing Allowance.** For some Registered Providers this will limit their income to a multiple of the Local Housing Allowance. In the long term this is likely to influence the type of homes they build with more smaller homes being likely. The proposal will see any single claimants under 35 only being eligible for the LHA Shared Accommodation Rate which at present is much lower than the LHA for one bedroom flats. This could result in reduced demand for RP properties with a shift toward the PRS.
- **The introduction of 3% higher stamp duty on buy to let properties and second homes.** This may result in the number of Buy-to-let landlords being reduced; through both sales of their existing properties and new landlords seeing the market as unviable. The Bank of England expressed their concerns that the proliferation of Buy-to-let landlords could result in a housing crash if they flood the market with their unwanted property. While the introduction of the new rules may not result in a flood of sales it may well reduce the supply of PRS properties.

6.116 It is too early to fully quantify the impact these changes will have on the supply and demand for affordable homes. However, the local authorities should monitor the situation. We would however

add that any reduction in the supply would need to be offset with increasing the need within the affordable housing calculations.

- 6.117 The Housing White Paper Published in February 2017 also set out the Government's proposals to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units.
- 6.118 This would be part of an overall review of the NPPF. On this basis it would seem reasonable for the Central Lancashire authorities to plan delivery on this basis. This would form part of the affordable housing need mix set out in the following chapters.

Affordable Housing Need: Key Messages

- An assessment of affordable housing need has been undertaken which is compliant with Government guidance to identify whether there is a shortfall or surplus of affordable housing in Central Lancashire. Overall, in the period from 2014 to 2034 a net deficit of 620 affordable homes per annum is identified. There is thus a requirement for new affordable housing in the HMA and the Councils are justified in seeking to secure additional affordable housing.
- How affordable housing need sits with the overall need for housing needs to be properly understood, it is important to bear in mind that the affordable housing needs model includes existing households who require a different size or tenure of accommodation rather than new accommodation per se. Additionally, the modelling includes newly forming households, who are already part of the demographic projections (i.e. they are already included within the need). Furthermore, many households secure suitable housing within the Private Rented Sector, supported by housing benefit.
- Once account is taken of the range of outputs with the modelling (including for different affordability thresholds) and the fact that many of the households in need are already living in accommodation (existing households) and the role played by the private rented sector, the analysis does not suggest that there is any strong evidence of a need to consider additional housing to help meet the affordable need. However the affordable housing evidence does support the basis for an upward adjustment from the demographic starting point; and the wider SHMA analysis helps to determine what scale of adjustment could be achievable.
- Additional analysis was carried out to look at how much of the affordable need could be met by different products, with a conclusion that around 10-15% of housing should be of an intermediate tenure (e.g. shared ownership) and the remainder being social or affordable rented housing. The analysis identified a particular need for social rented housing; although it is recognised that with the inclusion of housing benefit, many of these households would potentially be able to access an affordable rented product.
- A number of proposals were introduced in the Housing and Planning Act which may impact on the future supply of and demand for affordable housing. The impact of these proposals should be monitored by the local authorities to understand the likely impact these are having on levels of affordable housing need.

7 MARKET SIGNALS

Introduction

7.1 The Planning Practice Guidance sets that an assessment of market signals should be undertaken considering land prices; house prices; rents; affordability ratios; rates of development and overcrowding. Absolute and relative long-term trends are expected to be compared to those across similar demographic and economic areas; and nationally. Where a worsening trend is evident over the longer-term, the PPG advises that:

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings¹¹”

7.2 An adjustment to planned supply where appropriate is expected to be reasonable – this being that on reasonable assumptions and consistent with the principles of sustainable development, it could be expected to improve affordability.

7.3 This section reviews these market signals and where appropriate benchmarking them against county, regional and national comparators. In line with the PPG these findings were also benchmarked against ‘comparable areas.’

7.4 ONS publish a list of the most similar local authorities to each local authority. This is calculated using a Squared Euclidean Distance (SED) value assessed across 59 different census variables. The local authorities are then bracketed into five categories depending on their similarity. The categories are: Extremely Similar, Very Similar, Similar, Somewhat Similar and Less Similar.

7.5 In the case of the Central Lancashire authorities ONS identified nine local authorities which are considered the most similar. For the purpose of the analysis below the three most comparable authorities to each of the areas across have been identified and presented in Table 62.

Table 63: Comparator areas in local authority level

Authority	Comparable authority
Chorley	Lichfield
	Stafford
	Vale of Glamorgan
Preston	Leeds
	Derby
	Sheffield
South Ribble	Fareham
	Gedling
	Flintshire

Source: ONS

¹¹ PPG ID: 2a-019-20140306

Land Values

- 7.6 The DCLG produce data on residential land values in a publication *Land value estimates for policy appraisal* (DCLG, Dec 2015). This publication indicates post permission residential land values per hectare. The land value estimates published are based on valuing the proposed development and deducting the development costs, including allowances for base build cost, developer's profit, marketing costs, fees, and finance to leave a "residual" for the site value. The values also assume nil affordable housing provision.
- 7.7 The HMA has an average land value of £1,378,000. This figure falls below the national equivalent (excluding London) of £1,398,000. Including London the national figure is significantly higher at £6,017,000.
- 7.8 Residential land values are lowest in South Ribble (£963,000). The residential land value in Chorley is £1,415,000 and in Preston is £1,756,000.

Table 64: Residential Land Values, 2015

Area	Estimated Value per ha
Chorley	£1,415,000
Preston	£1,756,000
South Ribble	£963,000
HMA (Average)	£1,378,000
England excluding London	£1,958,000

Source: CLG December 2015

- 7.9 The table below provides a breakdown of estimated values of typical residential sites for the comparator areas. The highest values can be found in Lichfield (£2,825,000) and Fareham (£2,554,000) while the lowest values outside the HMA can be found in Stafford (£1,150,000) and Gedling (£1,175,000). These are higher than the value in South Ribble (£963,000). Figures for Vale of Glamorgan and Flintshire are not available due to their geographical location.

Table 65: Residential Land Values, 2015

Area	Estimated Value per ha
Lichfield (C)	£2,825,000
Fareham (SR)	£2,554,000
Leeds (P)	£1,966,000
Derby (P)	£1,925,000
Preston	£1,756,000
Sheffield (P)	£1,718,000
Chorley	£1,415,000
Gedling (SR)	£1,175,000
Stafford (C)	£1,150,000
South Ribble	£963,000

Source: CLG December 2015

7.10 Land Values in Preston are below those in two of its three comparable authorities. Chorley is below one of its comparable authorities and above the other. No land values estimates were published for Vale of Glamorgan as it was an England only database.

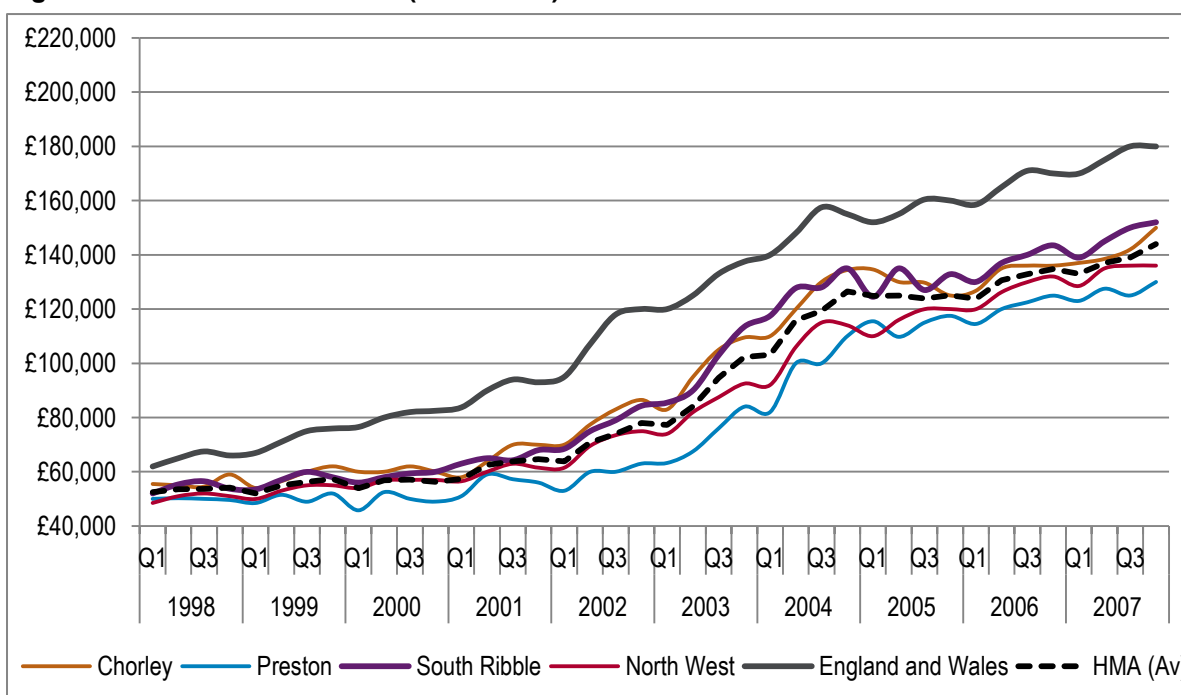
House Prices

7.11 We have assessed house prices over a range of different periods, taking account of housing market cycles.

7.12 Figure 42 shows the growth in median house prices over the pre-recession decade of 1998-07. Over that period the median house price in Chorley saw a substantial increase of £81,500 or 147% from £55,500 in 1998 to £137,000 in 2007. Similarly in Preston the prices increased by £73,000 (146%). In South Ribble the median price had increased by £86,963 (167%), the highest rate of growth across the HMA. It should be noted that the majority of the growth in house prices occurred between 2002 and 2004.

7.13 With regards to the wider comparators, the regional house prices had increased by £80,000 over this period (165%). Nationally the median prices increased by £108,000 (174%). With the exception of South Ribble therefore the HMA has tended to see slower growth than wider comparators.

Figure 42: Median House Price (1998- 2007)

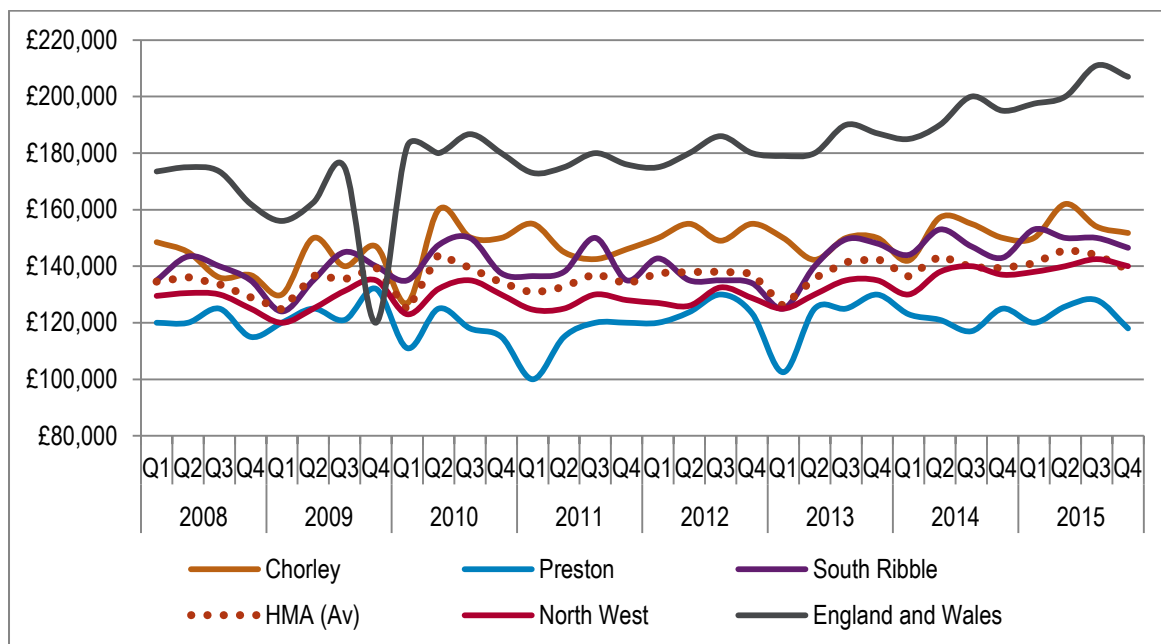


Source: DCLG Live Tables, Land Registry Data

7.14 All three authorities experienced price falls in late 2008/ early 2009 and as presented in Figure 43 but have seen some recovery since. Chorley’s prices showed a modest 1% increase between Q1 2008 and Q1 2015 (representing a fall in prices in real terms). Post- recessionary recovery was slower still in Preston with values in 2008 still to recover to 2008 levels. The highest increase over

the same period occurred in South Ribble, where median house prices increased by £17,995, an increase of over 13% in the 7 year period.

Figure 43: Median House Price (2008- 2015)



Source: GLH Analysis of HMLR Price Paid Data

7.15 Table 66 presents in detail the house price growth figures for 2008-15 period.

Table 66: House Price Changes, Q1 2008- Q1 2015

	Change	% Change	CAGR
Chorley	£1,500	1.0%	0.1%
Preston	£0	0.0%	0.0%
South Ribble	£17,995	13.3%	1.8%
HMA (Av)	£6,498	4.8%	0.7%
North West	£8,500	6.6%	0.9%
England and Wales	£24,000	13.8%	1.9%

Source: GLH Analysis of HMLR Price Paid Data

7.16 Table 66 compares changes in house prices over the last one, five, ten and 15 years across the local authorities, North West and England and Wales. The highest long term change in median house prices across the authority level can be found in South Ribble (173.2%), followed by Preston (162.2%). This is above the regional (155.6%) and national (158.2%) figures. However the figures are significantly influenced by price growth between 2002-4.

7.17 This is shown when looking at the last 10 years, over which the median house prices increased by a much more modest 4 – 23%, with once again the highest growth being observed in South Ribble. Median house price changed by 11.4% in Chorley and by only 3.9% in Preston while the regional equivalent was 25.5% and the national 29.9% over this period. Growth in prices has been more modest than wider comparators.

- 7.18 Looking at the shorter term market changes, during the last five years there was an 18.2% increase in the average house price in Chorley, 13.3% in South Ribble and 8.1% in Preston. In comparison, values increased by 12.2% at regional and 8.2% at national level.
- 7.19 To sum up, there was a substantial growth during the pre- recessionary period. Small or negative changes occurred over the last five years suggesting slow recovery rate in local level compared to the results at a regional and national level.

Table 67: Benchmarking House Price Inflation in Central Lancashire

	1 Year Change	5 Year Change	10 Year Change	15 Year Change
Chorley	5.6%	18.2%	11.4%	150.0%
Preston	-2.4%	8.1%	3.9%	162.2%
South Ribble	6.2%	13.3%	22.9%	173.2%
North West	6.2%	12.2%	25.5%	155.6%
England and Wales	6.8%	8.2%	29.9%	158.2%

Source: GLH Analysis: Land Registry Price Paid Data

- 7.20 The housing price market performance of the comparator authorities is presented below. Looking over a 10 year period, South Ribble has seen stronger comparative growth than a number of areas, but a growth rate below which remains below regional and national averages. It is also the only of the three authorities in which longer-term price growth over 15 years has been notably above regional and national levels and the relevant 'peer' areas.

Table 68: Benchmarking House Price Inflation in Central Lancashire

	1 Year Change	5 Year Change	10 Year Change	15 Year Change
South Ribble	6.2%	13.3%	22.9%	173.2%
Derby (P)	2.7%	9.3%	13.0%	171.0%
The Vale of Glamorgan (C)	3.4%	8.8%	27.6%	164.3%
Preston	-2.4%	8.1%	3.9%	162.2%
England and Wales	6.8%	8.2%	29.9%	158.2%
North West	6.2%	12.2%	25.5%	155.6%
Sheffield (P)	1.9%	5.9%	16.4%	154.7%
Chorley	5.6%	18.2%	11.4%	150.0%
Flintshire (SR)	6.4%	11.6%	17.3%	148.5%
Gedling (SR)	4.6%	9.3%	16.1%	145.8%
Stafford (C)	4.2%	7.5%	17.0%	145.7%
Leeds (P)	3.0%	5.5%	15.1%	139.1%
Lichfield (C)	4.4%	5.8%	16.9%	135.2%
Fareham (SR)	7.5%	19.5%	34.2%	127.0%

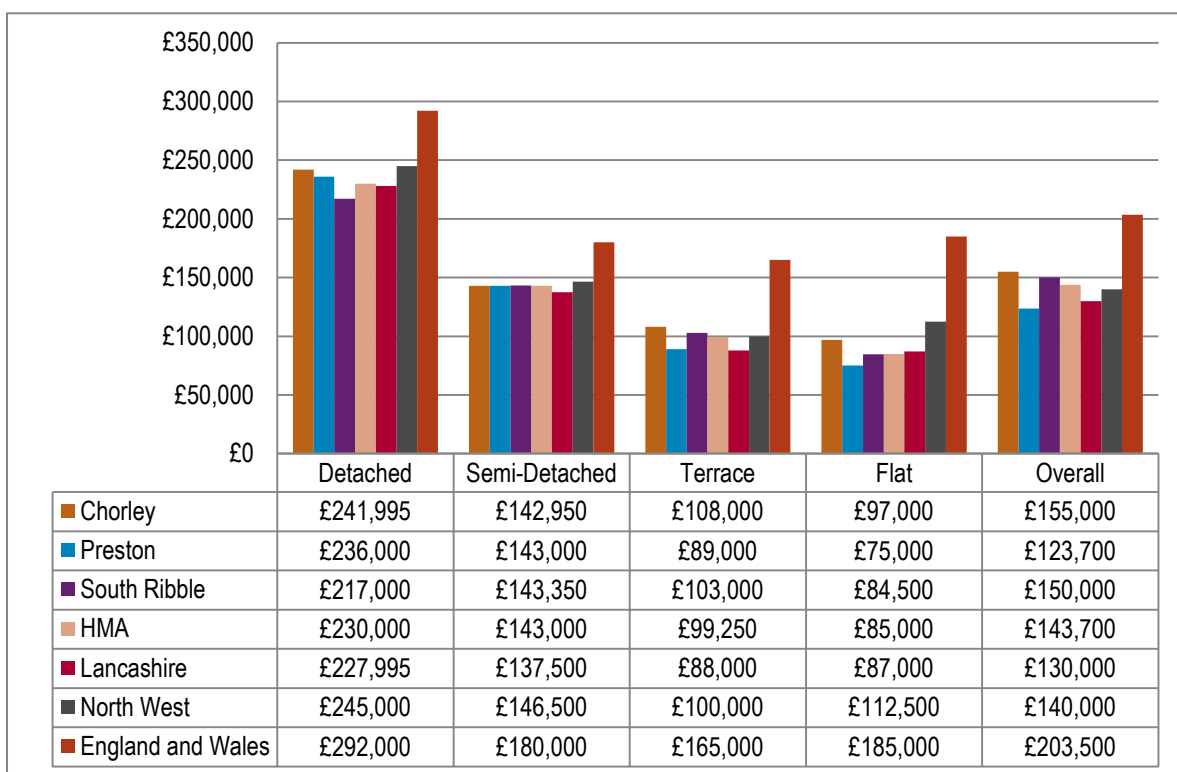
Source: GLH Analysis, Land Registry Price Paid Data

Current House Prices by Type

7.21 Average house prices can be skewed by the mix of properties sold. We have therefore benchmarked house prices by type using data on sales over the last full year (2015). Figure 45 shows median house prices by different dwelling type in local authority level.

7.22 On average house prices in Central Lancashire are significantly below the national average. Overall median house prices in Lancashire are £143,000 compared to £140,000 at the regional and £203,500 at the national level. At a local authority level, the highest median prices can be found in Chorley (£155,000) and South Ribble (£150,000). The lowest values are in Preston (£123,700). All of the authorities fall below the values at the national level.

Figure 44: Median House Prices by Property Type (2015)



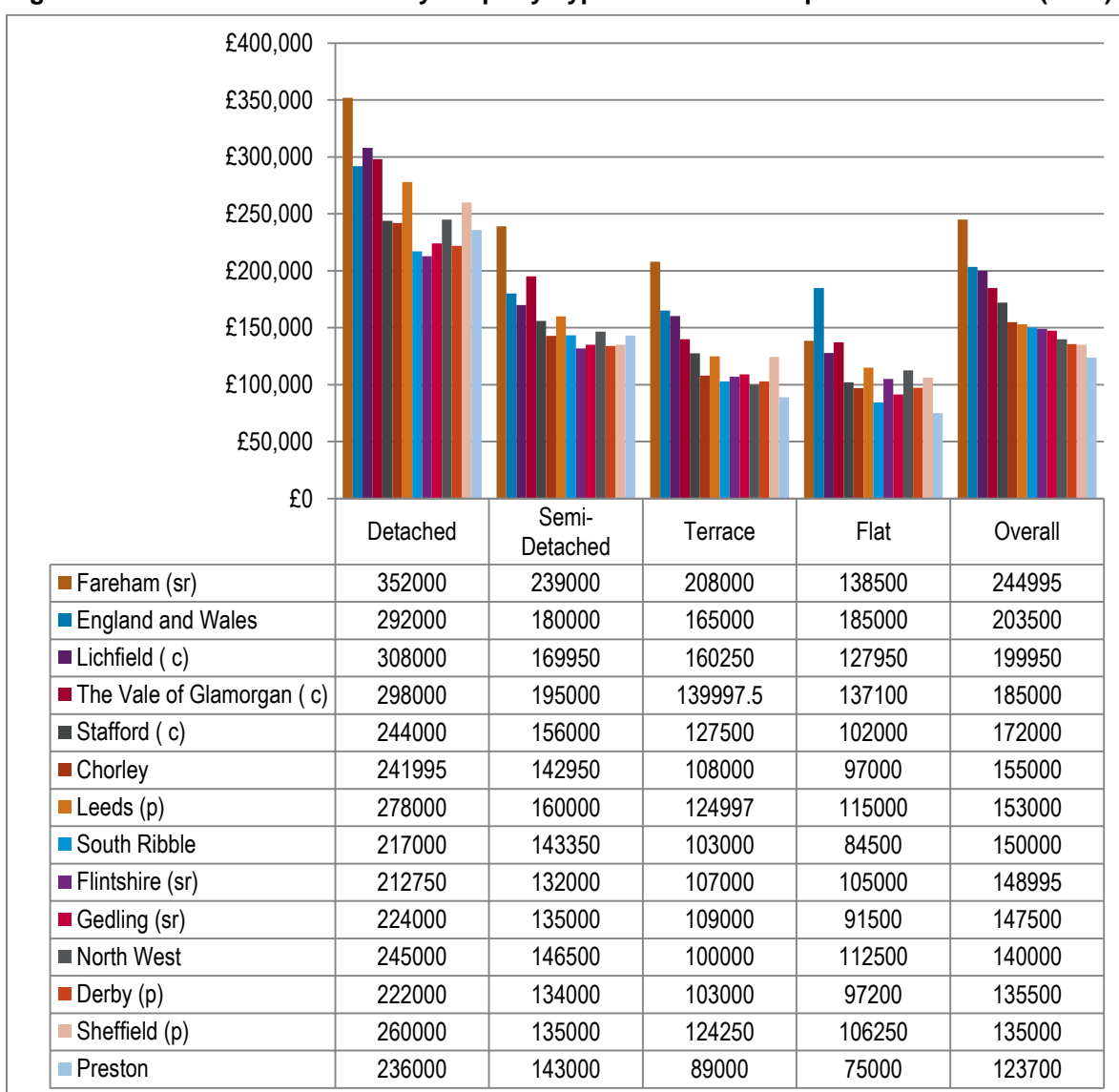
Source: GLH Analysis: Land Registry Price Paid Data

7.23 Detached properties have the highest values as a whole. Chorley has the highest detached values at £241,995, with Preston (£236,000) and South Ribble (£217,000). All areas are considerably lower than the national figure of £292,000.

7.24 Semi-detached properties are very similar across the three authorities. The median price for a semi-detached unit in Chorley is £142,950. This is slightly below the values in Preston and South Ribble, where values are £143,000 and £143,350 respectively. These are all below the regional (£146,500) and national (£180,000) averages.

- 7.25 The highest terraced median value is found in Chorley (£108,000). This can be compared to £103,000 in South Ribble and £89,000 in Preston. Once again the median values for this type of property at the local level fall below the regional and national figures.
- 7.26 The highest median value for flats is found in Chorley (£97,000), followed by South Ribble (£84,500) and Preston (£75,000). Again these values are substantially lower than the national figure of £185,000 but also the regional figure (£140,000).
- 7.27 When prices in Central Lancashire are measured against the ones in comparable areas (Figure 45) they tend to be at the lower end of scale. Both Preston and Chorley have the lowest overall median prices with their respective areas; whilst although South Ribble has the second highest overall median price the prices are very similar to those below it.

Figure 45: Median House Prices by Property Type across the comparable authorities (2015)



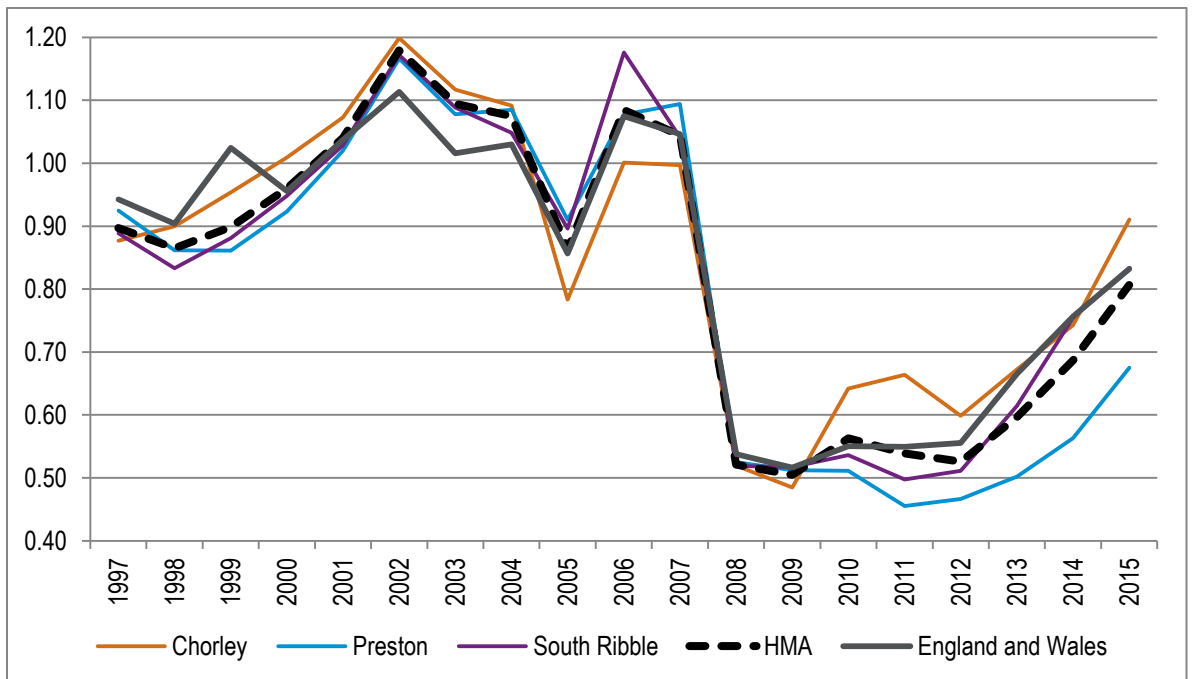
Source: GLH Analysis: Land Registry Price Paid Data

7.28 The highest figures for all types of properties can be found in Fareham while the lowest value detached and semi-detached prices are in Flintshire. Preston has the lowest values for terraced (£89,000) and flats (£75,000) prices.

Sales Volumes and Effective Demand

7.29 Sales are an important indicator of effective demand for market housing. Benchmarking sales performance against long term trends allows plan makers to assess the relative demand. Figure 46 presents the annual sales across local authority, region and national levels over the period of 1997 to 2015. It uses an index where 1.00 is the average annual sales over the 1998-2007 pre-recessionary period.

Figure 46: Indexed Analysis of Sales Trends¹² (1998- 2015)



Source: DCLG and Land Registry Price Paid Data

7.30 Evidently, there was a sharp drop in sales between 2007 and 2008 as a result of the recession. The data in Figure 47 shows that the national housing market and housing market area has not fully recovered. Preston has had the slowest rate of recovery, having recovered to 62% of the 2007 sales figure, with South Ribble recovering by 80%. In contrast, Chorley is at 91% of pre-recession levels.

Rental Costs

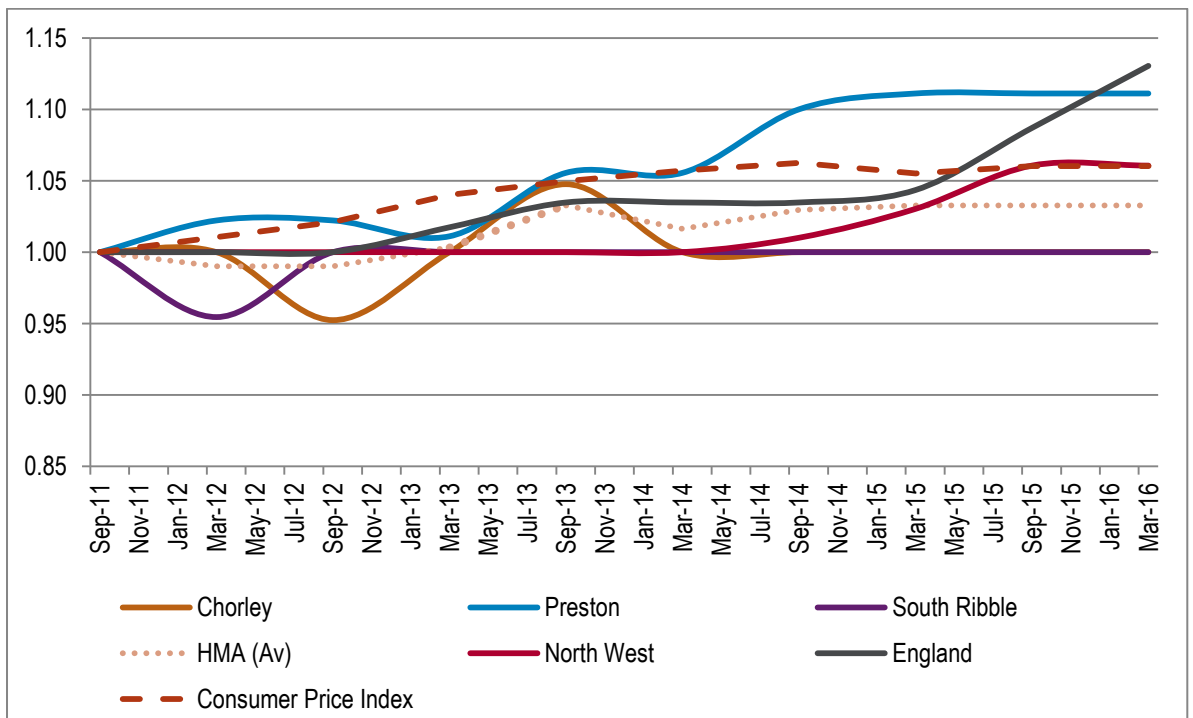
7.31 The most recent data release of the Valuation Office Agency’s (VOA) rental data covered the year to March 2016. This shows that the median rental price in Chorley is £525 per calendar month

¹² No available data at regional level

(pcm) and £500 pcm in both Preston and South Ribble. This compares to £525 pcm in North West and £650 pcm across England. Only in Chorley are rental costs above the regional average, albeit only marginally so.

7.32 Figure 47 shows changes in median rental values benchmarked to September 2011 values (this being the longest time series published by VOA). This shows growth in private rental values across the HMA and wider comparators. Whilst values have remained respectively flat in Chorley and South Ribble over the last 5 years, there was a steady but small increase in Preston, with median rental values growing by 11% over the last 5 years period.

Figure 47: Benchmarked trend in median private rental values (Sep 2011- March 2016)

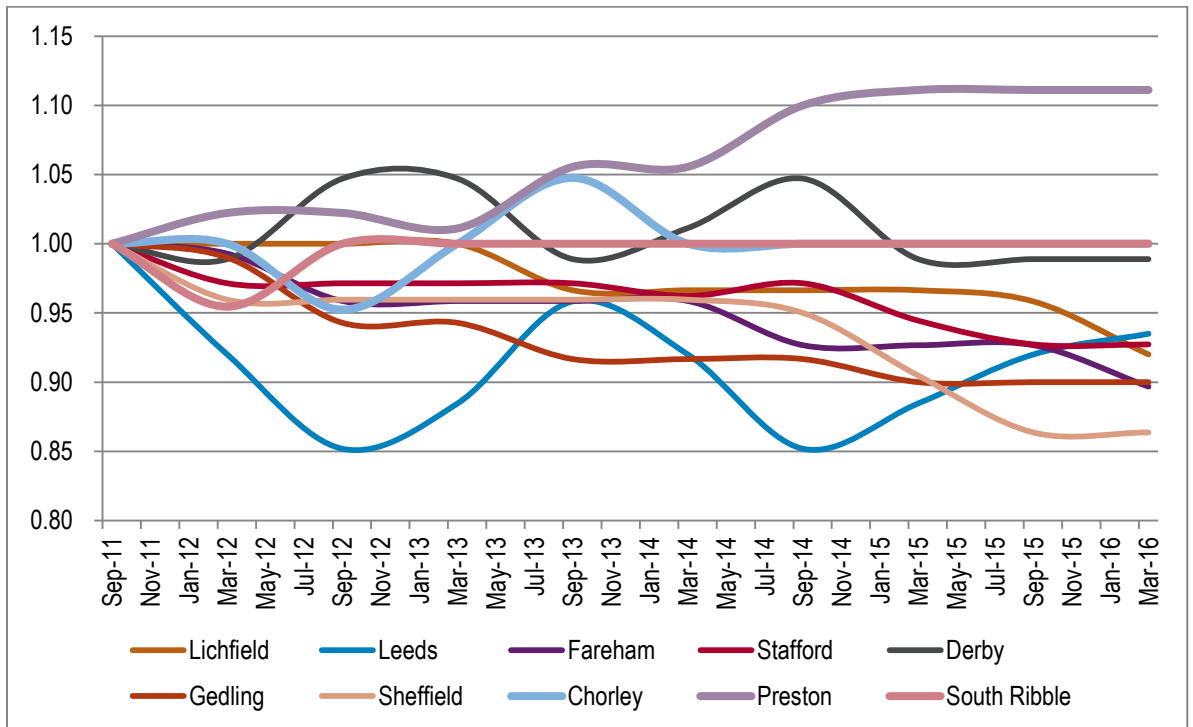


Source: VOA Private Rental Data

7.33 Figure 48 shows changes in median rental values of the comparator authorities benchmarked to September 2011 values similarly to the above. The rental market across the similar authorities performed below the national levels with all of the authorities recording a decrease in median rents over the period of 2011 and 2016.

7.34 In March 2016 rental values in Lichfield stood at £625 pcm which reflects 92% of the values from 2011. The highest decrease in rental values can be found in Sheffield (86%) and Gedling (90%) while the lowest decrease could be observed in Derby (99%), Stafford (93%) and Leeds (93%).

Figure 48: Benchmarked trend in median private rental values across the comparable authorities (Sep 2011- March 2016)

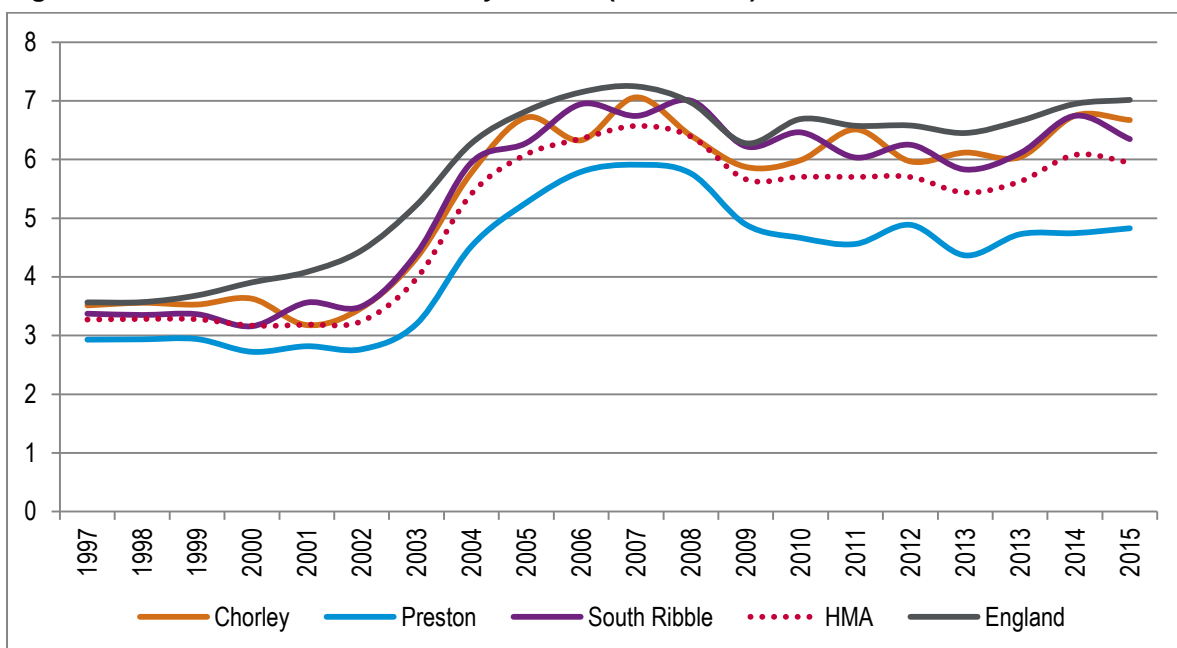


Source: VOA Private Rental Data

Affordability of Market Housing

- 7.35 We have considered evidence of affordability by looking specifically at the relationship between house prices/rental costs and earnings. Figure 49 presents the affordability trends across the HMA.
- 7.36 The most affordable area in terms of lower quartile purchase costs in 2015 was Preston with a ratio of 4.83, followed by South Ribble (6.35) and Chorley (6.67). All of these areas are below the national figure of 7.02 which means that in general the HMA is more affordable than a lot of other areas in the country.
- 7.37 The LQ price to income ratio increased notably between 2003 and 2005, but since 2007 the ratio has fallen in Chorley from 7.06 in 2007 to 5.97 in 2012. Generally, during the post-recessionary period there has a stabilisation of the affordability ratio across the HMA. Stable recent trends point towards a situation in which supply and demand are in balance.

Figure 49: Lower Quartile Affordability Trend¹³ (1997- 2015)



Source: DCLG Housing Statistics

7.38 Table 69 compares the lower quartile affordability ratio to the median price- earnings ratio to identify whether affordability is an issue across the market or within a particular segment. In the case of Chorley and Preston, the median ratio is above the lower quartile ratio by 0.19 and 0.20. In the case of South Ribble the lower quartile affordability ratio is slightly above the median ratio which suggests that affordability issues in South Ribble are more acute at the entry level.

Table 69: Comparison of Lower Quartile and Median Affordability (2015)

Area	Lower Quartile	Median	Difference
Chorley	6.67	6.86	-0.19
Preston	4.83	5.02	-0.20
South Ribble	6.35	6.28	0.06
HMA	5.95	6.06	-0.11
England	7.02	7.63	-0.61

Source: DCLG Housing Market Live Tables

7.39 With regards to the comparator areas, whilst regional differences are evident, the analysis overall does not show comparatively acute affordability issues relative to similar areas in any of the three HMA authorities.

¹³ No data available at regional level

Table 70: Comparison of Lower Quartile and Median Affordability (2015)

Area	Lower Quartile	Median	Difference
Preston	4.83	5.02	-0.20
Chorley	6.67	6.86	-0.19
Sheffield (P)	5.32	5.33	-0.02
Leeds (P)	5.80	5.76	0.04
Gedling (SR)	6.10	6.04	0.06
South Ribble	6.35	6.28	0.06
Lichfield (C)	8.33	7.80	0.54
Stafford (C)	7.55	6.88	0.67
Derby (P)	4.73	3.99	0.74
Fareham (SR)	9.61	8.86	0.75

Source: DCLG Housing Market Live Tables

7.40 Preston has one of the lowest affordability ratio for both Median and Lower Quartile levels. Although Chorley has the highest affordability ratio by both measures in the HMA, it is the lowest of its directly comparable areas.

7.41 We have also looked at the Rental Affordability Ratio which is expressed as the percentage of lower quartile income which goes towards lower quartile rental costs for all categories of lower quartile rental homes.

Table 71: Rental Affordability Ratio (2013-2015 average)

Local Authority	Rental Affordability Ratio
Chorley	31.3%
Preston	24.8%
South Ribble	34.0%
Lichfield (C)	33.2%
Stafford (C)	28.7%
Derby (P)	19.2%
Gedling (SR)	29.1%
Leeds (P)	30.9%
Sheffield (P)	29.1%
Fareham (SR)	39.0%
North West	37.8%
England and Wales	41.8%

Source: ASHE and VOA

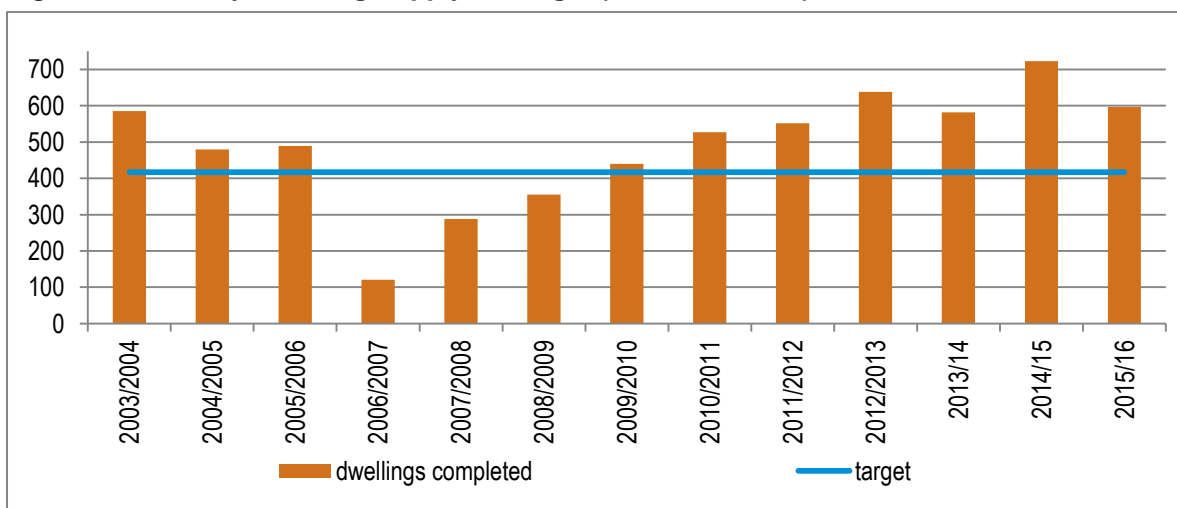
7.42 As shown in Table 71 Preston's lower quartile rental costs equate to less than a quarter of lower quarter earnings. This rises to 34% in South Ribble with Chorley at 31.3%. However, all three local authorities have a rental affordability ratio below the North West and England and Wales figures.

Housing Delivery Performance

7.43 Housing completions over the period since 2003/2004 have been compared against the relevant monitoring target in place at the relevant point. The data is derived from local authority Annual Monitoring Reports and/or Housing Land Position Statements.

7.44 In Chorley, from 2003/04 to 2005/06 the housing completions exceeded the target of 417 dwellings per annum. Between 2006/07 and 2008/09 the number of completions decreased significantly, with only 61% of dwellings being delivered against the target during this period. Despite the worsened economic circumstances, housing provision has exceeded the target in 2009 onwards, with 2012/13 seeing 221 completions above the 417 target. In total between 2003 and 2016 cumulatively there was 790 dwelling surplus. High housing completions are likely to have been influenced by the delivery of the Buckshaw Village development scheme.

Figure 50: Chorley- Housing Supply vs Target (2003/4- 2015/16)

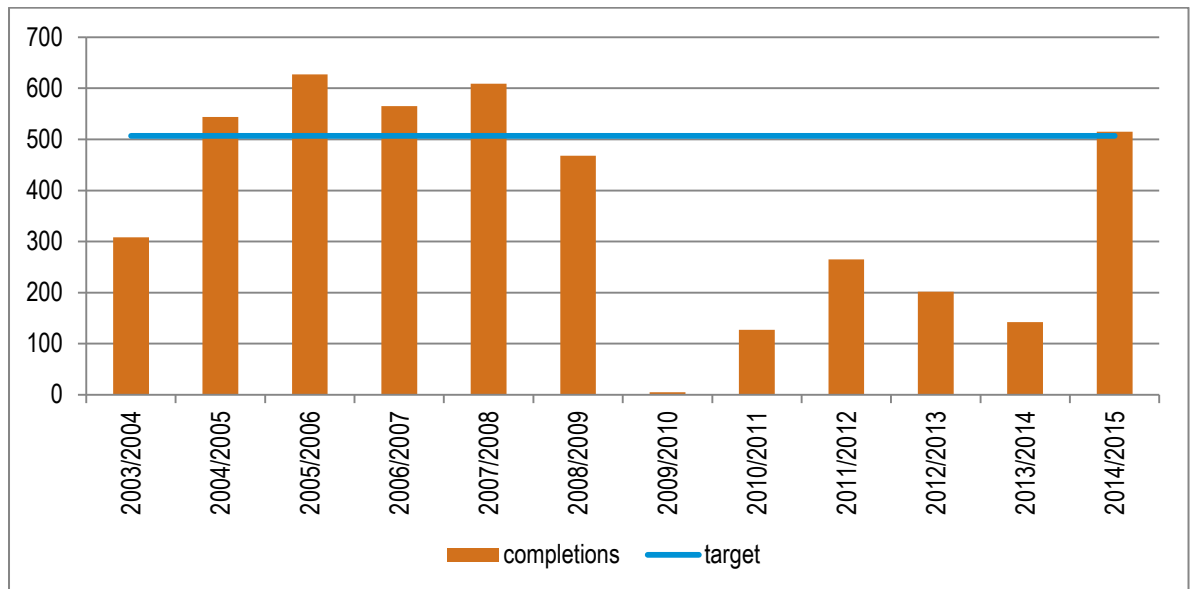


Source: Annual Monitoring Reports, Housing Land Monitoring Reports 2003-2016

7.45 It should be borne in mind that the high housing delivery in recent years is likely to have influenced short-term population trends, and projections based on these. This is a consideration in interpreting the demographic scenarios presented in this report. Conversely the official projections lock in the recent under-delivery against target in Preston and South Ribble (as shown in the following figures). Projections based on longer-term trends mitigate these short-term impacts.

7.46 The housing provision in Preston was close to the target of 507 dpa between 2004 and 2009 with 2,813 units completed over the 2,535 requirement. Since then the provision has decreased significantly. Only in the last available monitoring year have completions reached the target post-recession. Cumulatively there is an undersupply of more than 1,800 homes in Preston since 2003/4.

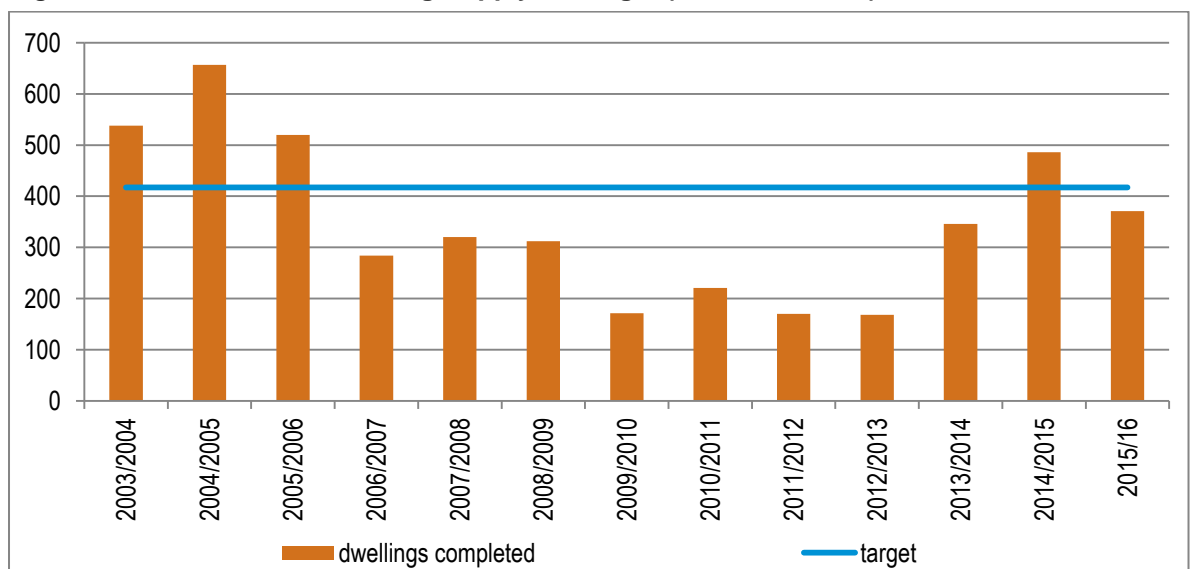
Figure 51: Preston- Housing Supply vs Target (2003/4- 2014/15)



Source: *Housing Land Position Preston, 2015*

7.47 In South Ribble, the borough’s housing completion totalled 4,748 residential units between 2003/04 and 2015/16. This has resulted in an undersupply of 857 for the 2003-2016 period. The area has seen a long period of consistent under-delivery with their target only being met four times in this period. The profile of housing completions in South Ribble (and Preston) however correlates with that at a national level where there was a sharp and significant drop in completions from 2009 – highlighting the influence of the credit crunch and market downturn on the new-build market.

Figure 52: South Ribble- Housing Supply vs Target (2003/4- 2015/16)



Source: *South Ribble Annual Monitoring Report*

Overcrowding and Under-Occupancy

- 7.48 Studying levels of overcrowding and under-occupancy in the housing stock is an important part of the SHMA. The Guidance identifies overcrowding as an indicator of the supply/demand balance. Analysis of housing occupancy levels are also useful as an indicator of the potential mismatch between households and house sizes.

Table 72: Under-occupancy and overcrowding

	Under-occupied	% of all households	Over-occupied	% of all households
Chorley	37,330	83.1%	1,692	3.8%
Preston	42,099	73.1%	4,292	7.5%
South Ribble	39,118	84.9%	1,396	3.0%
HMA	118,547	79.8%	7,380	5.0%
North West	2,302,256	76.5%	187,816	6.2%
England and Wales	17,070,912	73.1%	1,995,860	8.5%

Source: Census 2011

- 7.49 Overcrowding is defined by the number of households who have one or more rooms less than their household need. For example, a couple with a young child would have a need for two rooms but may only have one. Under-occupancy is the opposite when a household has one or more spare rooms than required.
- 7.50 Table 72 presents the under-occupancy and overcrowding percentages of the housing stock in local authority level as well as regionally and nationally. All of the authorities have high level of under-occupancy.
- 7.51 In terms of overcrowding households' rates, there is low percentage in the HMA at 5.0%. Preston presents the highest rate across HMA but still lower than the national equivalent of 8.5%. Both Chorley (3.8%) and South Ribble (3.0%) have even smaller percentage of over-crowded households.
- 7.52 Table 72 presents a comparison between 2001 and 2011 overcrowding rates. The highest increase in overcrowding occurred in South Ribble (25.5%) which is slightly above the increase at a regional level (23.4%) but well below that seen nationally England and Wales (32.1%). Across the HMA over-occupied properties increased by 22% which is only 1% lower than the regional change but substantially (10%) lower than the national one (32.1%).

Table 73: Under-occupancy and overcrowding change since 2001

	Under-occupied change	% change	Over-occupied change	% change
Chorley	3,487	10.3%	289	20.6%
Preston	2,414	6.1%	756	21.4%
South Ribble	2,998	8.3%	284	25.5%
HMA	8,899	8.1%	1,329	22.0%
North West	121,919	5.6%	35,568	23.4%
England and Wales	816,092	5.0%	485,438	32.1%

Source: Census 2011 & 2001

- 7.53 There has also been an increase in under-occupancy rates which varied between 6.1% in Preston to 10.3% in Chorley. The national change in under-occupancy reached only 5% and the regional 5.6%.
- 7.54 The growth in overcrowding within the HMA is likely to have been influenced in part by demographic change including a growing student population.

Concealed Families

- 7.55 According to the PPG concealed and shared households indicate un-met housing requirements for an area. A concealed family is defined as one living in a multi-family household in addition to the primary family, such as a young couple living with their parents.
- 7.56 Similar to the overcrowding rates presented above, Preston City is the only authority across the HMA that presents a notable rate of concealed families as well as shared households. Both Chorley and South Ribble present lower figures than both the regional and national equivalents.

Table 74: Concealed families 2001 & 2011

	2001	% of all house-holds	2011	% of all house-holds	2011-2001 Change	%change
Chorley	246	0.8%	339	1.1%	93	37.8%
Preston	558	1.6%	814	2.3%	256	45.9%
South Ribble	262	0.8%	444	1.3%	182	69.5%
HMA	1,066	1.1%	1,597	1.6%	531	49.8%
North West	21,162	1.1%	32,128	1.6%	10,966	51.8%
England & Wales	169,765	1.2%	289,295	1.8%	119,530	70.4%

Source: Census 2011 & 2001

- 7.57 There has been an increase in concealed households of 49.8% across the HMA, but the proportional increase reflects the low base, with the number of concealed households' reaching just 1.6% of all households. The rate across the HMA remains below the regional equivalent (1.6%) and lower than the national figure (1.8%).

- 7.58 The highest percentage growth occurred in South Ribble (69.5%), which is still lower than the national change but higher than the regional equivalent, where the concealed households represent 1.3% of the total. In absolute terms the highest growth was in Preston influenced in its younger population.
- 7.59 The aggregate growth in concealed households across the HMA over the 2011-11 period was modest, at 531 households. Provision of affordable housing will be important in addressing this, and concealed households are considered in the modelling of affordable housing need. The SHMA considers upwards adjustments from the starting point (2014-based) demographic projections which will deliver additional market and affordable homes, and the scale of upward adjustments made more than addresses the scale of concealed households shown.

Shared Households

- 7.60 In 2011 the highest percentage of sharing households was found in Preston where 4.4% of the families share their home with others. This is below the national level (4.4%) but above the regional trend (3.4%).
- 7.61 Table 75 shows the percentage of shared household in 2001 and 2011 the change during this period. There has been an increase of 32.7% across HMA with shared households representing 3.2% of all households in 2011. This was lower than the national (32.4%) and regional (35.5%) comparators.

Table 75: Shared households 2001 & 2011

	2001		2011		2011-2001	
	Shared households	% of all households	Shared households	% of all households	Change	% change
Chorley	841	2.0%	1,099	2.4%	258	30.7%
Preston	1,774	3.3%	2,340	4.1%	566	31.9%
South Ribble	918	2.1%	1,250	2.7%	332	36.2%
HMA	3,533	2.6%	4,689	3.2%	1,156	32.7%
North West	76,626	2.7%	103,801	3.4%	27,175	35.5%
England & Wales	784,745	3.6%	1,038,993	4.4%	254,248	32.4%

Source: Census 2011 & 2001

- 7.62 The highest percentage change occurred in South Ribble (36.2%) although in absolute terms Preston had a greater change (1,156). The growth in shared households in South Ribble was above the regional (35.5%) and national (32.5%) figures, whereas in Chorley and Preston was below all three.

Qualitative Assessment

- 7.63 In order to further understand the performance of the Central Lancashire market, GL Hearn carried out a targeted consultation with several local estate agents across HMA during July-August 2016. This section aims to complement the findings of the above quantitative analysis. It provides some insight in to the local market and identifies differences in the local markets. It should however be interpreted as representing the situation at the point in time of the assessment.
- 7.64 Overall, respondents tended to have a positive outlook about the local market and stated that the sales and lettings market had performed reasonably strongly. The following paragraphs present the findings for each local authority.

Chorley

- 7.65 The sales market in Chorley performs well with interest increasing around the upper price range of the market at the time of the assessment. Agents indicated that there had been a notable decrease in the lower end of the market, with buyers less interested in cheaper properties over the last few months. This is linked to April's Stamp Duty changes which resulted in a significant decrease in investors' activity across the market. This in our experience was a national trend at that time. One of the agents indicated that the level of sales is around 30 properties per month which was significantly above their target.
- 7.66 Buyers across Chorley tended to be couples or families seeking to upgrade and/or upsize their property. Agents indicated strong demand for 3-bed properties and in particular bungalows and detached units. There are few first-time buyers who usually target the lowest end of the market.
- 7.67 Comparing to last year, values had remained fairly stable and were expected to continue to do so. The vote to leave the EU has not had notable impacts yet. Moreover there have been a proportion of cash buyers that positively influenced the market. In general the number of buyers increased significantly with agents reporting a level of sales almost doubling over the past year.
- 7.68 The most popular location within Chorley is Euxton, according to agents, as it offers good accessibility and transport facilities, followed by other locations in Central Chorley.
- 7.69 The lettings market is was also reported to be strong, with a lot of properties being let in a very short period of time. Young families expecting to get onto the property ladder in the near future are the main groups of tenants.
- 7.70 Rental values hadn't increased over the past few months according to agents. This was primarily caused by the sharp spike in the number of properties released on the market during the pre-Stamp Duty changes. Given the existing growth in demand, it is anticipated that the values would increase soon.

Preston

- 7.71 There is a fair amount of interest across Preston according to local agents. The most notable change over the last few months was the reduced activity by investors, which had eased the competition at the lower end of the market. As a result there has been a gradual increase in first-time buyers, a trend which has continued over the last 2 to 3 years.
- 7.72 The main group of buyers in Preston are young professionals and couples in their mid-20s to mid-30s looking to get on the property ladder. Usually they seek to buy terraced or semi-detached properties.
- 7.73 There is a strong demand for properties in Central Preston primarily driven by the setting and good transport links to the main urban areas such as Manchester and Liverpool. There is also a strong interest for the market in Ashton-on-Ribble.
- 7.74 Some of the respondents indicated that more diversity of the stock (more flats) could be beneficiary as some of the prospective buyers entering the housing ladder cannot afford to purchase terraced properties.
- 7.75 Prices had stabilised over the last few months and were expected to continue to do so in the short term. Over the longer term it is expected that prices will slightly increase given the increasing demand in the area. This is further linked to the supply issue, with fewer new builds being delivered in the area. The agents noted that new build units perform slightly better than the secondary stock, nevertheless the respondents were not sure how much of a premium new-builds achieve.
- 7.76 Comparing the sales market to the last few years, agents indicated a marginal change, with small or no difference observed in the volume of the stock being transacted. Nevertheless, there was a significant shift in the profile of the buyers, with more professional couples and families replacing investor activity.
- 7.77 Lettings agents suggested that the market was good and there was demand from professionals in their mid-20s and mid-30s moving into the area as a stepping stone to purchasing locally. A significant amount of tenants are students whose activity decreases over the summer period.
- 7.78 Flats or shared accommodation are in demand with a particular focus on 2-bed en-suite flats in central areas. This accommodation achieves around £500 pcm in rental values which is broadly similar to the values achieved in terraced homes in less desirable location.
- 7.79 Overall, respondents indicated a small growth in rental values across Preston, with rents increasing on average 2-5% compared to last year. Usually, the values achieved are approximately £500 for a 2-bed flat located in central Preston or a terraced house on the outskirts of the City.

- 7.80 Finally the activity of Buy-to-Let investors has decreased since April 2016. The remaining investors focus on flats and the low value terraced houses.

South Ribble

- 7.81 Agents reported that the sales market across South Ribble performs well with most of the properties being sold fairly quickly after being released onto the market. In comparison to neighbouring areas, South Ribble attracts families or more senior people with more disposable incomes. First-time buyers represent a small percentage of the prospective buyers. Investor activity was reported to be limited.
- 7.82 The market was fairly stable and despite the increasing interest in the area over the past few months, it is anticipated to remain flat throughout the next 12 to 18 months. This is primarily due to the future uncertainty derived by the recent vote to Leave European Union.
- 7.83 Bungalows and detached units are the most popular types of properties in the area. There is a high demand on 3-bed detached properties, with prices starting from £150,000- £200,000 depending on the location and the quality of the units. The agents suggested that buyers were more likely to adjust their preferences on the basis of the available stock.
- 7.84 The agents suggested that there was a need for more detached properties, as these are currently in high demand. They also suggested buyers in the area typically expressed interest in larger gardens.
- 7.85 Similarly to the sales market, the lettings market is performing well across the South Ribble District, with properties being let shortly after appearing onto the market. The most popular group of tenants were senior couples and families relocating from more urban locations such as Preston, Blackburn or even Liverpool.
- 7.86 The rental values start from £600 pcm for 3-bed properties, with the highest values of £750 pcm achieved on high quality detached units. Finally, Penwortham and Walton-le-Dale are the most attractive areas within the district as they offer, according to agents, a great setting in proximity to Preston.

Responding to Market Signals

- 7.87 The PPG sets out that “*a worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections*”. In the context of the PPG, the appropriate test is therefore whether an upward adjustment should be made from the starting point household projections (in this case the 2014-based Household Projections) to take account of market signals.

- 7.88 There is however no guidance as to what an appropriate upwards adjustment should be: the PPG simply sets out that it should be “*at a level that is reasonable*”. There have been a number of inspectors reports which have examined what is “reasonable”. The conclusions emerging from an analysis of some key reports are set out below.

Inspectors’ Views on Market Signals Uplifts

- 7.89 Probably the most cited inspectors’ reports where market signals have been considered are in Eastleigh and Uttlesford, where different inspectors suggested that the local authorities should consider increasing housing need by 10% as a result of the evidence. Key quotes from these reports are provided below.

Eastleigh (February 2015) – *‘It is very difficult to judge the appropriate scale of such an uplift. I consider a cautious approach is reasonable bearing in mind that any practical benefit is likely to be very limited because Eastleigh is only part of a much larger HMA. Exploration of an uplift of, say, 10% would be compatible with the “modest” pressure of market signals recognised in the SHMA itself’*

Uttlesford (December 2014) – *‘I conclude that it would be reasonable and proportionate, in Uttlesford’s circumstances, to make an upward adjustment to the OAN, thereby increasing provision with a view to relieving some of the pressures. In my view it would be appropriate to examine an overall increase of around 10%...’*

- 7.90 There are more recent from higher value areas in the South East of inspectors or consultants judging that higher adjustments are warranted, such as 25% in Waverley in Surrey or Cambridge; or 20% in Mid Sussex.

- 7.91 To balance the analysis, however, it should be noted that there are a number of inspectors who have not suggested any need for an uplift due to market signals and these would include:

Mendip (October 2014 – Appendix 7) – *‘these findings indicate that trends in Mendip sit fairly comfortably alongside county, regional and national trends and do not, therefore, justify an upward adjustment of the housing numbers that came out of the housing projection’*

Crawley (May 2015 – Appendix 8) – *‘I am not convinced that the market signals uplift is justified by the evidence, for the various indicators reveal a situation in Crawley which is not as severe as in other North West Sussex authorities, and one that has not worsened in recent years’* (this is an interesting case given that the Council themselves had suggested an uplift for market signals)

Cornwall (June 2015) – *‘National guidance is that a worsening trend in any relevant market signal should result in an uplift. But for the reasons given below I do not consider that I should require such an uplift to be made for Cornwall at this time’* (this one is also interesting given that it was the same inspector as Eastleigh).

- 7.92 Other more recent examples where adjustments have been found not to be required include Stratford-on-Avon and Warwick in the West Midlands; and Maidstone in Kent.

Addressing Affordability

- 7.93 It is sensible in considering what adjustments, if any, might be warranted to consider both the market signals and affordable housing needs' evidence.
- 7.94 The affordable housing need and market signals information point towards some modest affordability pressures in Central Lancashire, although these vary in each of the local authorities. Most notably Chorley and to a lesser extent South Ribble have some challenging market signals data; while Preston is one of the most affordable location in the country although it does have quite high affordable housing need (influenced in part by its younger population).
- 7.95 Overall the market signals evidence shows the following:
- Residential land values which across the HMA are below the national average (excluding London). Land values are highest in Preston.
 - House prices which grew strongly between 2002-4, but with the evidence showing prices which have fallen in real terms when considered over this market cycle (4.8% pa growth 2008-2015) or over the last decade;
 - Within the HMA whilst Chorley had marginally the highest house price of the three authorities (£155,000, 2015), the evidence indicates that this is influenced in part by the mix of properties sold. Prices for comparable house types look reasonably similar, with values for semi-detached homes of around £143,000 and for terraced homes of £89,000 - £108,000 across the three authorities. Sales volumes in Chorley had recovered slightly more strongly than in other areas.
 - Rental costs which in South Ribble and Chorley have remained flat over the 2010/11 – 2015/16 period, but grown by 11% in Preston. Taking account of inflation, in Chorley and South Ribble rental costs have fallen in real terms.
 - A lower quartile affordability ratio which stood in 2015 at 6.7 in Chorley, 4.8 in Preston and 6.3 in South Ribble giving an HMA average of 6.0. In all cases this fell below the national average (7.0). The North West average is 5.4.
 - Housing delivery performance which saw an over-delivery of homes in Chorley, but an under-delivery in South Ribble and Preston relative to the Joint Core Strategy/ Regional Strategy requirement figures.
 - Some modest growth in overcrowding, numbers of concealed families and shared households between 2001-11, but with growth in all cases below that seen nationally. In Chorley the number of overcrowded households increased by 289, with a growth of 258 shared households and evidence of 339 concealed families in the Borough in 2011 (an increase of 93 on 2011).
- 7.96 Reflecting the range of inspector's decisions and the guidance we would conclude that an adjustment of around 10% on the demographic starting point would be justified in Chorley and South Ribble; but no adjustment is warranted in Preston given the market signals evidence which does not point to notable affordability pressures.
- 7.97 Applying the 10% upward adjustment to the 2014-based SNPP figures gives a need for 562 dpa in Chorley (511 x 1.1) and 200 dpa in South Ribble (182 x 1.1) which combined with the need for 241 dpa in Preston results in a need for 1003 dpa across the HMA. The upwards adjustments will deliver additional market and affordable homes.
- 7.98

Market Signals: Key Messages

- The analysis of market signals points to house prices which are generally below the national trends, modestly above the regional average in South Ribble and Chorley and generally below both in Preston. The evidence does not point to particular 'market imbalance' across the whole housing market area. There is evidence that affordability deteriorated over the 2001-11 period however the situation considering more recent trends is one which suggests broad stability between supply and demand.
- The City of Preston for example is one of the most affordable locations in the country. House prices relative to earnings are higher in Chorley and to a lesser extent South Ribble but below the national average. Rents on the other hand have been stable in these areas.
- The evidence justifies some upward adjustment from the demographic starting point, but one which is modest. Applying a 10% upward adjustment in Chorley and South Ribble results in a need for 1003 dpa. This sits below that suggested by the economic-led need.

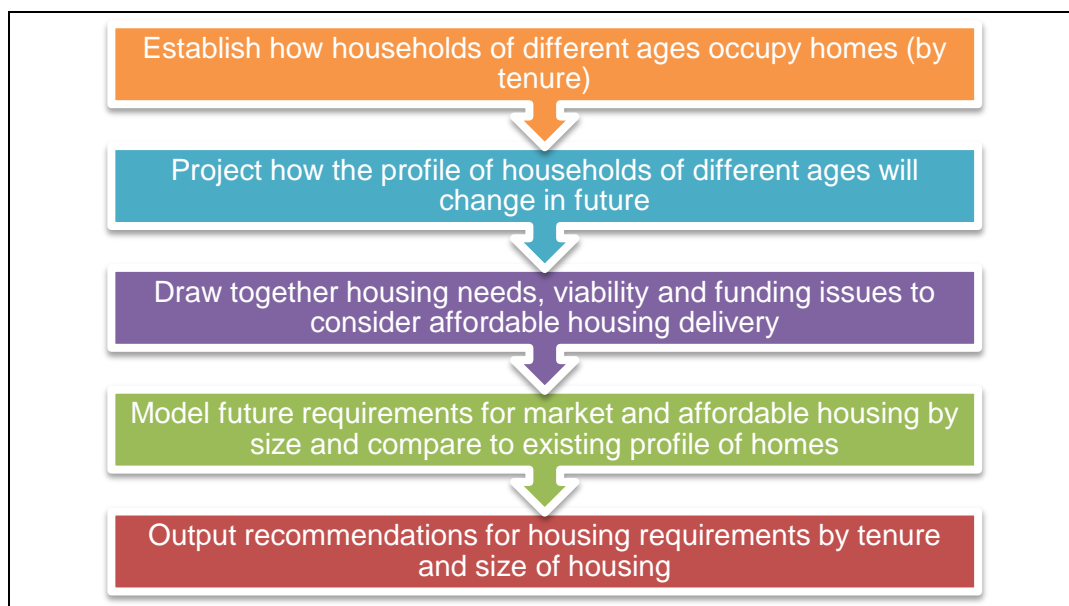
9 NEED FOR DIFFERENT SIZES AND TYPES (TENURES) OF HOMES

Introduction

- 9.1 As discussed in previous sections, there are a range of factors which influence housing demand. These factors play out at different spatial scales and influence both the level of housing demand (in terms of aggregate household growth) and the nature of demand for different types, tenures and sizes of homes. It is important to understand that the housing market is influenced by macro-economic factors, as well as the housing market conditions at a regional and local level.
- 9.2 This section assesses the need for different sizes of homes in the future, modelling the implications of demographic drivers on need/demand for different sizes of homes in different tenures. The assessment is intended to provide an understanding of the implications of demographic dynamics on need and demand for different sizes of homes.
- 9.3 The analysis in this section seeks to use the information available about the size and structure of the population and household structures; and consider what impact this may have on the sizes of housing required in the future. For analysis purposes, the analysis assumes population and household growth in line with the demographic projection linked to the 2014-based household projections and also with 15-year migration trends (the highest of the demographic projections developed). These two projections represent the range to be considered when looking at objectively assessed need. These projections indicate household growth of between about 18,200 and 22,800 across the HMA between 2014 and 2034.
- 9.4 It should be noted that these projections will not necessarily be translated into policy, but have been used to indicate the likely need for different sizes of homes moving forward.

Methodology

- 9.5 The figure below describes the broad methodology employed in the housing market model which is used to consider the need for different sizes of market and affordable homes. Data is drawn from a range of sources including the 2011 Census and demographic projections.

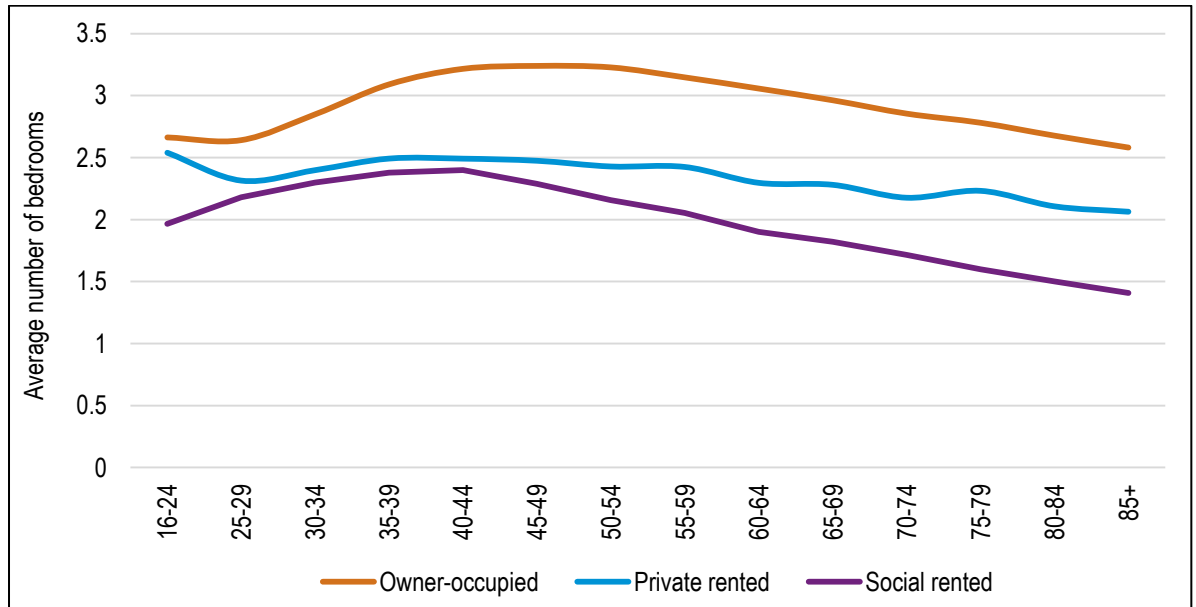
Figure 53: Stages in the Housing Market Model

Understanding how Households Occupy Homes

- 9.6 Whilst the demographic projections provide a good indication of how the population and household structure will develop, it is not a simple task to convert the net increase in the number of households into a suggested profile for additional housing to be provided. The main reason for this is that in the market sector households are able to buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.
- 9.7 The size of housing which households occupy relates more to their wealth and age than the number of people which they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a four-bedroom home as long as they can afford it and hence projecting an increase in single person households does not automatically translate into a need for smaller units. This issue is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) although there will still be some level of under-occupation moving forward with regard to older person and working households who may be able to under-occupy housing.
- 9.8 The approach used is to interrogate information derived in the projections about the number of household reference persons (HRPs) in each age group and apply this to the profile of housing within these groups. The data for this analysis has been formed from a commissioned table by ONS (Table CT0621 which provides relevant data for all local authorities in England and Wales from the 2011 Census).
- 9.9 The figure below shows an estimate of how the average number of bedrooms varies by different ages of HRP and broad tenure group. In the owner-occupied sector the average size of accommodation rises over time to typically reach a peak around the age of 40-54; a similar pattern

(but with smaller dwelling sizes and lower reductions is seen in the private rented sector). In the social rented sector, this peak appears earlier. After this peak, the average dwelling size decreases – as typically some households downsize as they get older. It is also notable that the average size for affordable housing dwellings are lower than those for market housing for all age groups.

Figure 54: Average Bedrooms by Age and Tenure – Central Lancashire



Source: Derived from ONS Commissioned Table CT0621

9.10 In terms of the analysis to follow, the outputs have been segmented into three broad categories. These are market housing, which is taken to follow the occupancy profiles in the owner-occupied sector; affordable home ownership, which is taken to follow the occupancy profile in the private rented sector (this is seen as reasonable as the Government’s desired growth in home ownership looks to be largely driven by a wish to see households move out of private renting) and affordable housing, which is taken to follow the occupancy profile in the social rented sector. The affordable sector in the analysis to follow is expected to largely be rented housing and would include affordable rented housing.

Tenure Assumptions

9.11 The housing market model has been used to estimate the future need for different sizes of property over the 20-year period from 2014 to 2034. The model works by looking at the types and sizes of accommodation occupied by different ages of residents, and attaching projected changes in the population to this to project need and demand for different sizes of homes. However, the way households of different ages occupy homes differs between the market and affordable sectors (as shown earlier). Thus it is necessary to consider what the mix of future housing will be in the market and affordable sectors.

- 9.12 It is necessary on this basis to make some judgement for modelling purposes on what proportion of net completions might be of market and affordable housing. For modelling purposes, the analysis assumes that 30% of net completions are either affordable housing (rented) or low-cost home ownership and therefore that 70% are market housing (designed to be sold for owner-occupation). The figure of 30% is consistent with Policy 7(a) of the Adopted Core Strategy (which has a range from 30%-35% depending on location). Within the 30% affordable/low-cost a split of 2:1 has been used; this means an estimated total of 20% of completions as affordable housing (rented) and 10% as low-cost home ownership. The 10% low-cost home ownership has been selected to be consistent with the Housing White Paper, with the recognition that the affordable needs assessment in this report does suggest that the greatest needs are for rented housing.
- 9.13 It should be stressed that these figures are not policy targets. Policy targets for affordable housing on new development schemes in some cases are above this; but not all sites deliver policy-compliant affordable housing provision, whilst some delivery is on sites below affordable housing policy thresholds. Equally some housing development is brought forward by Registered Providers and local authorities and may deliver higher proportions of affordable housing than in current policy. The figures used are not a policy position and has been applied simply for the purposes of providing outputs from the modelling process. To confirm, it has been assumed that the following proportions of different tenures will be provided moving forward:
- Market housing – 70%
 - Low-cost home ownership – 10%
 - Social/affordable rent – 20%

Key Findings: Market Housing

- 9.14 There are a range of factors which can influence demand for market housing in different locations. The focus of this analysis is on considering long-term needs, where changing demographics are expected to be a key influence. It uses a demographic-driven approach to quantify demand for different sizes of properties over the 20-year period from 2014 to 2034.
- 9.15 Looking first at projecting on the basis of the 2014-based SNPP, an increase of 12,700 additional households is modelled. The majority of these need two- and three-bed homes. The data suggests that housing need can be expected to reinforce the existing profile, but with a shift towards a requirement for smaller dwellings relative to the distribution of existing housing (particularly towards a need for 2-bedroom homes). This is understandable given the fact that household sizes are expected to fall slightly in the future – particularly as a result of a growing older population living in smaller households.

Table 76: Estimated Size of Dwellings Needed 2014 to 2034 – Market Housing – 2014-based SNPP – Central Lancashire)

Size	2014	2034	Additional households 2014-2034	% of additional households
1 bedroom	2,259	2,604	345	2.7%
2 bedrooms	24,680	28,550	3,870	30.4%
3 bedrooms	56,174	62,669	6,496	51.1%
4+ bedrooms	25,853	27,865	2,013	15.8%
Total	108,965	121,688	12,723	100.0%

Source: Housing Market Model

- 9.16 When looking at a demographic projection based on 15-year migration trends, it can be seen that the number of households in the market sector would be projected to increase by 15,900. The estimated size profile required is still focused on two- and three-bedroom homes but there is a slightly larger need shown for larger (4+ bedroom) accommodation. This difference will be due to the 15-year migration based projection having a higher level of in-migration; migrants tending to be younger people and more likely to be part of family households (who tend to live in larger homes).

Table 77: Estimated Size of Dwellings Needed 2014 to 2034 – Market Housing – 15-year migration trends – Central Lancashire)

Size	2014	2034	Additional households 2014-2034	% of additional households
1 bedroom	2,259	2,674	415	2.6%
2 bedrooms	24,680	29,272	4,592	28.8%
3 bedrooms	56,174	64,418	8,244	51.7%
4+ bedrooms	25,853	28,549	2,697	16.9%
Total	108,965	124,913	15,948	100.0%

Source: Housing Market Model

- 9.17 The statistics are based upon the modelling of demographic trends. As has been identified, it should be recognised that a range of factors including affordability pressures and market signals will continue to be important in understanding market demand; this may include an increased demand in the private rented sector for rooms in a shared house due to changes in housing benefit for single people. In determining policies for housing mix, policy aspirations are also relevant.
- 9.18 At the strategic level, a local authority in considering which sites to allocate, can consider what type of development would likely be delivered on these sites. It can also provide guidance on housing mix implicitly through policies on development densities.
- 9.19 The analysis has also been undertaken by local authority with the table below showing the outputs for the 15-year migration based projection. This shows only small variations between areas, with arguably the most notable being the relatively low need for 4+ bedroom accommodation in South

Ribble (and a higher figure in the two-bedroom category). However, on balance, the differences between areas are not so great that a different approach in different locations necessarily needs to be taken.

Table 78: Estimated size mix of dwellings by local authority – market housing

	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Chorley	2%	29%	50%	18%
Preston	3%	26%	53%	18%
South Ribble	3%	32%	52%	14%
Central Lancashire	3%	29%	52%	17%

Source: Housing Market Model

Key Findings: Low-cost home ownership

9.20 The tables below show estimates of the need for different sizes of affordable home ownership based on the analysis of demographic trends (firstly linked to the 2014-based SNPP and then to the 15-year migration based scenario). The data suggests in the period between 2014 and 2034 that the main need is again for homes with two- or three-bedrooms, although the proportions in the 1-bedroom category are higher than for market housing.

9.21 As with the market analysis, the outputs linked to the 15-year migration based projection show a greater need for larger homes (although both sets of data very much focus on smaller (particularly two-bedroom) dwellings). There is less variation in the findings for low-cost home ownership under the different projection scenarios than for market housing. This is because this analysis tends to focus on younger households who are not impacted by downsizing in the same way as the market sector (due to the relatively low number of older person households in this category).

Table 79: Estimated Size of Dwellings Needed 2014 to 2034 – low-cost home ownership – 2014-based SNPP – Central Lancashire)

Size	2014	2034	Additional households 2014-2034	% of additional households
1 bedroom	3,580	3,930	350	19.3%
2 bedrooms	8,047	8,773	726	40.0%
3 bedrooms	6,684	7,263	579	31.9%
4+ bedrooms	2,229	2,391	162	8.9%
Total	20,540	22,358	1,818	100.0%

Source: Housing Market Model

Table 80: Estimated Size of Dwellings Needed 2014 to 2034 – low-cost home ownership – 15-year migration trends – Central Lancashire)

Size	2014	2034	Additional households 2014-2034	% of additional households
1 bedroom	3,580	4,004	423	18.6%
2 bedrooms	8,047	8,953	906	39.8%
3 bedrooms	6,684	7,423	738	32.4%
4+ bedrooms	2,229	2,440	211	9.2%
Total	20,540	22,819	2,278	100.0%

Source: Housing Market Model

- 9.22 The analysis has also been undertaken by local authority with the table below showing the outputs for the 15-year migration based projection. This shows some variations between areas, this includes a relatively low need for 1-bedroom accommodation in South Ribble and a relatively high figure for 4+ bedrooms in Preston. The first of these figures (1-bed in South Ribble) is likely in part to be influenced by the demographic and current stock profile in the area, whereas the 4+ bedroom finding in Preston is likely to some degree to be influenced by the student population (given that households in the private rented sector are driving much of this analysis). Hence, whilst the differences between areas are more notable than was the case for market housing, it is still questionable if these are substantial enough for different targets in different areas to be set.

Table 81: Estimated size mix of dwellings by local authority – low-cost home ownership

	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Chorley	21%	40%	32%	7%
Preston	22%	37%	28%	12%
South Ribble	12%	42%	38%	8%
Central Lancashire	19%	40%	32%	9%

Source: Housing Market Model

Key Findings: Affordable Housing (rented)

- 9.23 The tables below show estimates of the need for different sizes of affordable homes based on the analysis of demographic trends (firstly linked to the 2014-based SNPP and then to the 14-year migration based scenario). The data suggests in the period between 2014 and 2034 that the main need is for homes with one- or two-bedrooms. The outputs linked to the 15-year migration projection show a greater need for larger homes (although both sets of data very much focus on smaller dwellings).
- 9.24 This analysis provides a longer-term view of the need for different sizes of affordable housing and does not reflect any specific priorities such as for family households in need rather than single people. In addition, it should be noted that smaller properties (i.e. one bedroom homes) typically offer limited flexibility in accommodating the changing needs of households, whilst delivery of larger

properties can help to meet the needs of households in high priority and to manage the housing stock by releasing supply of smaller properties. That said, there may in the short-term be an increased requirement for smaller homes as a result of welfare reforms limiting the amount of housing benefit being paid to some working-age households.

Table 82: Estimated Size of Dwellings Needed 2014 to 2034 – affordable housing (rented) – 2014-based SNPP – Central Lancashire)

Size	2014	2034	Additional households 2014-2034	% of additional households
1 bedroom	7,827	9,560	1,733	47.7%
2 bedrooms	6,704	7,680	976	26.8%
3 bedrooms	6,858	7,695	837	23.0%
4+ bedrooms	744	833	89	2.5%
Total	22,132	25,768	3,635	100.0%

Source: Housing Market Model

Table 83: Estimated Size of Dwellings Needed 2014 to 2034 – affordable housing (rented) – 15-year migration trends – Central Lancashire)

Size	2014	2034	Additional households 2014-2034	% of additional households
1 bedroom	7,827	9,882	2,055	45.1%
2 bedrooms	6,704	7,946	1,242	27.3%
3 bedrooms	6,858	7,999	1,142	25.1%
4+ bedrooms	744	861	118	2.6%
Total	22,132	26,689	4,557	100.0%

Source: Housing Market Model

- 9.25 As with market housing, the data again shows that relative to the current profile there is a slight move towards a greater proportion of smaller homes being needed (again related to the ageing population and the observation that older person households are more likely to occupy smaller dwellings).
- 9.26 The analysis has also been undertaken by local authority with the table below showing the outputs for the 15-year migration based projection. This shows relatively little variation between areas, with arguably the most notable being the relatively high need for 3-bedroom accommodation in Preston (albeit only 4% different from the other areas). Given the differences between areas, it is not considered that different strategic mixes for local authorities would be justified (based on this evidence alone).

Table 84: Estimated size mix of dwellings by local authority – affordable housing (rented)

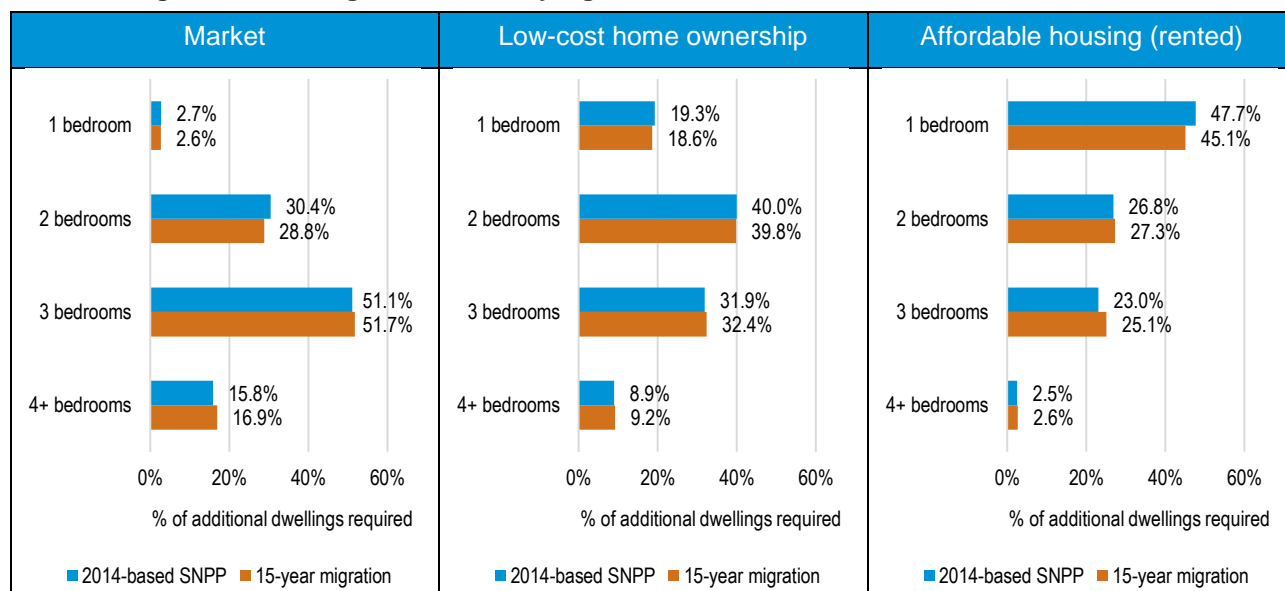
	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Chorley	46%	28%	23%	3%
Preston	44%	26%	27%	3%
South Ribble	45%	28%	25%	2%
Central Lancashire	45%	27%	25%	3%

Source: Housing Market Model

Indicative Targets by Tenure

9.27 The figure below summarises the above data in both the market and affordable sectors under the modelling exercise. The analysis clear shows the different profiles in the three broad tenures with affordable housing being more heavily skewed towards smaller dwellings, and affordable home ownership sitting somewhere in between the market and affordable housing.

Figure 55: Average Bedrooms by Age and Tenure – Central Lancashire



Source: Housing Market Model

9.28 Whilst the output of the modelling provides estimates of the proportion of homes of different sizes that are needed, there are a range of factors which should be taken into account in setting policies for provision. This is particularly the case in the affordable sector where there are typically issues around the demand for and turnover of one bedroom homes (as well as allocations to older person households) – e.g. one bedroom homes provide limited flexibility for households (e.g. a couple household expecting to start a family) and as a result can see relatively high levels of turnover – therefore, it may not be appropriate to provide as much one-bedroom stock as is suggested by the modelling exercise. At the other end of the scale, conclusions also need to consider that the stock of four-bedroom affordable housing is very limited and tends to have a very low turnover. As a result, whilst the number of households coming forward for four or more bedroom homes is typically quite small the ability for these needs to be met is even more limited.

- 9.29 For these reasons it is suggested in converting the long-term modelled outputs into a profile of housing to be provided (in the affordable sector) that the proportion of one bedroom homes required is reduced slightly from these outputs with a commensurate increase in four or more bedroom homes also being appropriate.
- 9.30 There are thus a range of factors which are relevant in considering policies for the mix of affordable housing (rented) sought through development schemes. At a HMA-wide level, the analysis would support policies for the mix of affordable housing (rented) of:
- 1-bed properties: 35-40%
 - 2-bed properties: 30-35%
 - 3-bed properties: 20-25%
 - 4-bed properties: 5-10%
- 9.31 The strategic conclusions recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.
- 9.32 The need for affordable housing of different sizes will vary by area (at a more localised level) and over time. In considering the mix of homes to be provided within specific development schemes, the information herein should be brought together with details of households currently on the Housing Register in the local area and the stock and turnover of existing properties.
- 9.33 In the low-cost home ownership and market sectors a profile of housing that closely matches the outputs of the modelling is suggested. The recommendations take some account of the time period used for the modelling and the fact that the full impact of the ageing population will not be experienced in the short-term.
- 9.34 On the basis of these factors it is considered that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households. On this basis the following mix of low-cost home ownership is suggested:
- 1-bed properties: 15-20%
 - 2-bed properties: 40-45%
 - 3-bed properties: 30-35%
 - 4-bed properties: 5-10%
- 9.35 Finally, in the market sector, a balance of dwellings is suggested that takes account of both the demand for homes and the changing demographic profile, this sees a slightly larger recommended profile compared with other tenure groups. The following mix of market housing is suggested:
- 1-bed properties: 0-5%
 - 2-bed properties: 25-30%
 - 3-bed properties: 50-55%
 - 4-bed properties: 15-20%

- 9.36 Although the analysis has quantified this on the basis of the market modelling and an understanding of the current housing market, it does not necessarily follow that such prescriptive figures should be included in the plan making process. The 'market' is to some degree a better judge of what is the most appropriate profile of homes to deliver at any point in time, and demand can change over time linked to macro-economic factors and local supply. The figures can however be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area.

Housing Mix (Size of Homes Needed): Key Messages

- There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability. The analysis linked to long-term (2014-34) demographic change concludes that the following represents an appropriate mix of affordable and market homes:

	1-bed	2-bed	3-bed	4+ bed
Market	0-5%	25-30%	50-55%	15-20%
Low-cost home ownership	15-20%	40-45%	30-35%	5-10%
Affordable housing (rented)	35-40%	30-35%	20-25%	5-10%

- The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.
- The mix identified above should inform strategic policies. In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.
- Based on the evidence, it is expected that the focus of new market housing provision will be on two- and three-bed properties. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retain flexibility for friends and family to come and stay.
- The analysis of an appropriate mix of dwellings should also inform the 'portfolio' of sites which are considered by each local authority through its local plan process. Equally it will be of relevance to affordable housing negotiations.
- The analysis within the main report also looked at the housing mix in each of the three local authority areas. Whilst there were differences between locations, it is not considered that these are so great as to point towards a different profile of new housing being needed when compared to HMA level findings.

10 SPECIALIST HOUSING NEEDS

Introduction

- 10.1 This report has established the need for different sizes of properties and tenures over the 20-year period to 2034, however there can be specific groups within the population who require specialist housing solutions or for whom housing needs may differ from the wider population. These groups are considered within this section and there is a particular focus on older persons and people with disabilities. This leads through into analysis of the need for the Councils to consider Housing Technical Standards.
- 10.2 Planning Practice Guidance note 56 (Housing: optional technical standards) sets out how local authorities can gather evidence to set requirements on a range of issues (including accessibility and wheelchair housing standards, water efficiency standards and internal space standards). This section looks at the first two of these (i.e. accessibility and wheelchair housing) as well as considering the specific needs of older people.
- 10.3 The PPG sets out that the reason for the approach to setting standards is designed to *'rationalise the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes'* (56-001) and that *'local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area'* (56-002).
- 10.4 The PPG sets out that local authorities should be using their assessment of housing need (and other sources) to consider the need for M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. It sets out that there are a range of published statistics which can be considered, including:
- the likely future need for housing for older and disabled people (including wheelchair user dwellings);
 - size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes);
 - the accessibility and adaptability of existing housing stock;
 - how needs vary across different housing tenures; and
 - the overall impact on viability.
- 10.5 This section of the report draws on a range of statistics, including those suggested in the PPG (for which the Government has provided a summary data sheet 'Guide to available disability data') – termed the Guide in analysis to follow. The discussion below begins by looking at older persons' needs.

Current Population of Older People

- 10.6 The table below provides baseline population data about older persons and compares this with other areas. The data for has been taken from the published ONS mid-year population estimates and is provided for age groups from 65 and upwards. The data shows, when compared with England that the HMA has a similar proportion of older persons; but a proportion below equivalent data for the County and region. In 2016, it was estimated that 18% of the population of the HMA was aged 65 or over; there is some notable variation by area with Preston only seeing 15% of its population aged 65 and over, compared with 19% in Chorley and 21% in South Ribble.

Table 85: Older Person Population (2016)

		Under 65	65-74	75-84	85+	Total	Total 65+
Chorley	Popn	92,175	13,193	6,640	2,343	114,351	22,176
	% of popn	80.6%	11.5%	5.8%	2.0%	100.0%	19.4%
Preston	Popn	121,061	11,137	6,949	2,654	141,801	20,740
	% of popn	85.4%	7.9%	4.9%	1.9%	100.0%	14.6%
South Ribble	Popn	87,429	12,734	7,170	2,785	110,118	22,689
	% of popn	79.4%	11.6%	6.5%	2.5%	100.0%	20.6%
Central Lancashire	Popn	300,665	37,064	20,759	7,782	366,270	65,605
	% of popn	82.1%	10.1%	5.7%	2.1%	100.0%	17.9%
Lancashire	% of popn	79.8%	11.2%	6.4%	2.5%	100.0%	20.2%
North West	% of popn	81.7%	10.1%	5.9%	2.3%	100.0%	18.3%
England	% of popn	82.1%	9.8%	5.7%	2.4%	100.0%	17.9%

Source: ONS Mid-Year Population Estimates

Future Change in the Population of Older Persons

- 10.7 As well as providing a baseline position for the proportion of older persons in the HMA, population projections can be used to provide an indication of how the numbers might change in the future compared with other areas. The data presented below uses the 2014-based SNPP for consistency across areas and runs from 2014 to 2034 to be consistent with the projections developed in this report.
- 10.8 The data shows that the HMA is expected to see a notable increase in the older person population with the total number of people aged 65 and over expected to increase by 46% over the 20-years from 2014; this compares with overall population growth of 7% and a decrease in the Under 65 population of 1%. All areas are projected to see a notable increase in the number of older persons, the figures are highest in Chorley and lowest in Preston, this will to some extent be influenced by overall levels of population growth (as shown in the 2014-based SNPP).

Table 86: Projected Change in Population of Older Persons (2014 to 2034)

	Under 65	65-74	75-84	85+	Total	Total 65+
Chorley	6.1%	28.5%	76.3%	175.8%	15.9%	58.6%
Preston	-2.8%	31.3%	31.5%	81.1%	3.1%	37.8%
South Ribble	-7.0%	20.2%	49.8%	128.3%	2.9%	42.6%
Central Lancashire	-1.3%	26.5%	51.6%	126.2%	7.0%	46.4%
Lancashire	-3.6%	22.1%	45.6%	111.9%	5.2%	40.9%
North West	-0.7%	26.5%	43.7%	105.3%	7.0%	41.9%
England	6.2%	33.5%	50.3%	110.3%	13.8%	49.3%

Source: ONS subnational population projections (2014-based)

- 10.9 In total population terms, the projections show an increase in the population aged 65 and over of 29,200 people, this is against a backdrop of an overall increase of 25,200 and a decrease in the population aged under 65 of 4,000.

Table 87: Projected Change in Population of Older Persons (2014 to 2034) – Central Lancashire (2014-based SNPP)

	2014 population	2034 population	Change in population	% change
Under 65	298,171	294,203	-3,968	-1.3%
65-74	35,461	44,859	9,398	26.5%
75-84	19,983	30,286	10,303	51.6%
85+	7,521	17,013	9,492	126.2%
Total	361,136	386,361	25,225	7.0%
Total 65+	62,965	92,158	29,193	46.4%

Source: ONS subnational population projections (2014-based)

- 10.10 The figures above are all based on the latest (2014-based) SNPP. It is possible to also show how the outputs would be expected to change under different scenarios. The table below shows a similar analysis when linked to 15-year migration trends. In this case there is still a significant ageing of the population but the decrease in the population aged under 65 has turned into a small level of positive growth. The large change in the under 65 age group relative to older groups reflects the migration assumptions, migration being largely concentrated in typical working-age groups (and their associated children).

Table 88: Projected Change in Population of Older Persons (2014 to 2034) – Central Lancashire (15-year migration trends)

	2014 population	2034 population	Change in population	% change
Under 65	298,171	304,414	6,243	2.1%
65-74	35,461	45,580	10,119	28.5%
75-84	19,983	30,617	10,634	53.2%
85+	7,521	17,221	9,700	129.0%
Total	361,136	397,832	36,696	10.2%
Total 65+	62,965	93,418	30,453	48.4%

Source: Demographic Projections

Health-related Population Projections

- 10.11 In addition to providing projections about how the number and proportion of older people is expected to change in the future, an analysis can look at the likely impact of population change on the number of people with specific illnesses or disabilities. For this data from the Projecting Older People Information System (POPPI) website has been used which provides prevalence rates for different disabilities by age and sex. For the purposes of the SHMA, analysis has focussed on estimates of the number of people with dementia and mobility problems.
- 10.12 For both of the health issues analysed the figures relate to the population aged 65 and over. The figures from POPPI are based on prevalence rates from a range of different sources and whilst these might change in the future (e.g. as general health of the older person population improves) the estimates are likely to be of the right order.
- 10.13 The table below shows that both of the illnesses/disabilities are expected to increase significantly in the future although this would be expected given the increasing population. In particular, there is projected to be a large rise in the number of people with dementia (up 81%-83%) along with a 65%-67% increase in the number with mobility problems.
- 10.14 When related back to the total projected change to the population, the increase of 7,400 people with a mobility problem represents around 20% of the total population growth projected by the projections (when linked to 15-year migration trends).

Table 89: Estimated Population Change for range of Health Issues (2014 to 2034) – Central Lancashire

		Type of illness/ disability	2014	2034	Change	% increase
Chorley	2014-based SNPP	Dementia	1,288	2,711	1,423	110.4%
		Mobility problems	3,541	6,606	3,065	86.6%
	15-year migration	Dementia	1,288	2,685	1,397	108.4%
		Mobility problems	3,541	6,547	3,006	84.9%
Preston	2014-based SNPP	Dementia	1,408	2,170	762	54.1%
		Mobility problems	3,692	5,398	1,706	46.2%
	15-year migration	Dementia	1,408	2,197	789	56.0%
		Mobility problems	3,692	5,471	1,779	48.2%
South Ribble	2014-based SNPP	Dementia	1,417	2,568	1,151	81.2%
		Mobility problems	3,818	6,215	2,397	62.8%
	15-year migration	Dementia	1,417	2,662	1,245	87.8%
		Mobility problems	3,818	6,439	2,621	68.6%
Central Lancashire	2014-based SNPP	Dementia	4,114	7,449	3,335	81.1%
		Mobility problems	11,051	18,219	7,168	64.9%
	15-year migration	Dementia	4,114	7,544	3,431	83.4%
		Mobility problems	11,051	18,462	7,411	67.1%

Source: Data from POPPI and demographic projections

People with Disabilities

- 10.15 The CLG Disability data guide provides data about households with a long-term illness or disability from the English Housing Survey. Whilst this provides a national perspective, the source cannot provide more localised data. Hence the analysis below has drawn on the 2011 Census (which has a definition of long-term health problem or disability (LTHPD)).
- 10.16 The table below shows the proportion of people with a long-term health problem or disability (LTHPD) and the proportion of households where at least one person has a LTHPD. The data suggests that across the HMA some 26% of households contain someone with a LTHPD. This figure is slightly lower than seen across the County and region, but is in line with the national average. The figures for the population with a LTHPD again show a similar pattern in comparison with other areas (an estimated 18% of the population of the HMA have a LTHPD).

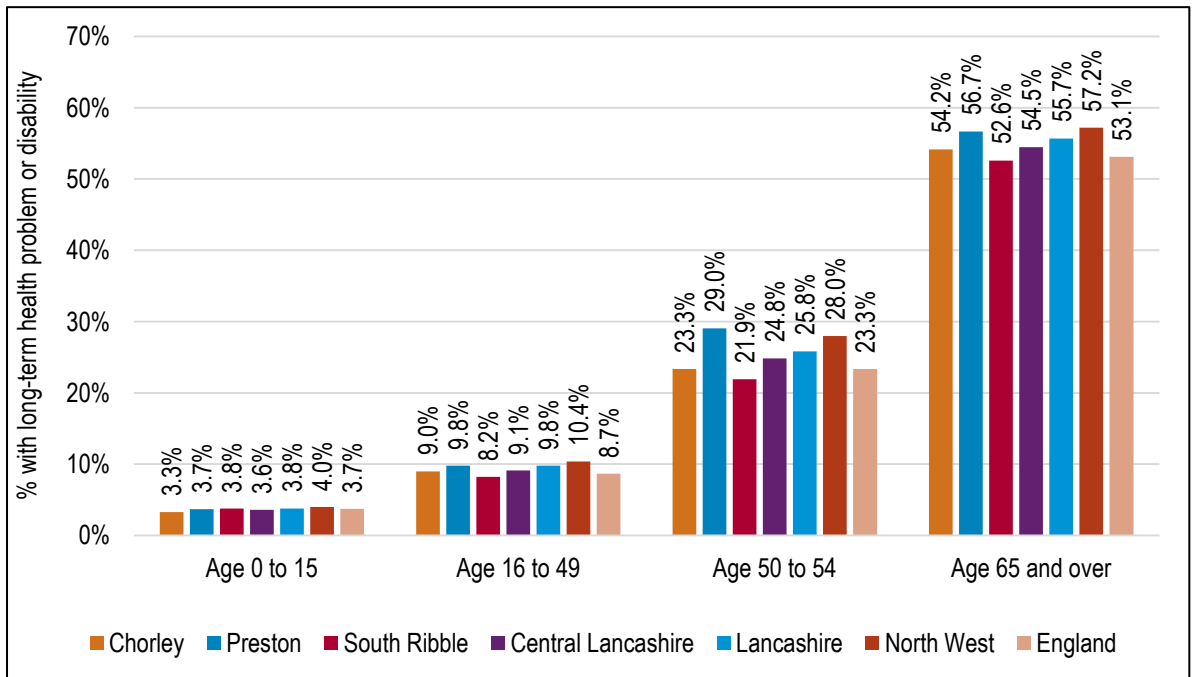
Table 90: Households and people with Long-Term Health Problem or Disability (2011)

	Households containing someone with health problem		Population with health problem	
	Number	%	Number	%
Chorley	11,505	25.6%	19,738	18.4%
Preston	15,504	26.9%	25,485	18.2%
South Ribble	11,734	25.5%	19,636	18.0%
Central Lancashire	38,743	26.1%	64,859	18.2%
Lancashire	138,733	28.0%	235,012	20.1%
North West	857,462	28.5%	1,426,805	20.2%
England	5,659,606	25.7%	9,352,586	17.6%

Source: 2011 Census

10.17 It is likely that the age profile of the area will impact upon the numbers of people with a LTHPD, as older people tend to be more likely to have a LTHPD. Therefore, the figure below shows the age bands of people with a LTHPD. It is clear from this analysis that those people in the oldest age bands are more likely to have a LTHPD – for example some 54% of people aged 65 and over have a LTHPD. The data at a local authority level is also notable for showing relatively high levels of LTHPD in Preston.

Figure 56: Population with Long-Term Health Problem or Disability in each Age Band



Source: 2011 Census

10.18 The age specific prevalence rates shown above can be applied to the demographic data to estimate the likely increase over time of the number of people with a LTHPD. In applying this information to the demographic projections (the 2014-based SNPP) it is estimated that the number of people with a LTHPD will increase by around 17,500 (a 26% increase); with a slightly higher figure if using 15-year migration trends.

- 10.19 Across the HMA, the vast majority of this increase (99%-105%) is expected to be in age groups aged 65 and over. The population increase of people with a LTHPD represents 52%-70% of the total increase in the population estimated by the projections.

Table 91: Estimated change in population with LTHPD (2014-2034) – linked to 2014-based SNPP

	Population with LTHPD		Change (2014-34)	% change from 2014
	2014	2034		
Chorley	20,671	29,142	8,471	41.0%
Preston	25,629	29,535	3,907	15.2%
South Ribble	20,326	25,490	5,164	25.4%
Central Lancashire	66,626	84,167	17,541	26.3%

Source: Derived from demographic modelling and Census (2011)

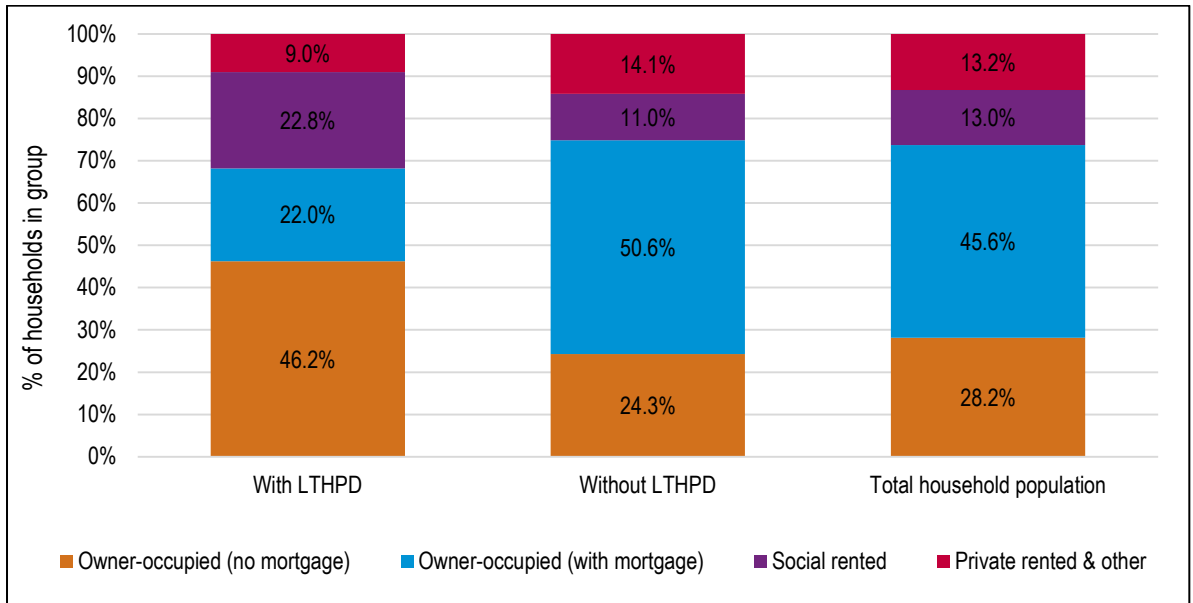
Table 92: Estimated change in population with LTHPD (2014-2034) – linked to 15-year migration trends

	Population with LTHPD		Change (2014-34)	% change from 2014
	2014	2034		
Chorley	20,671	28,568	7,897	38.2%
Preston	25,629	30,509	4,881	19.0%
South Ribble	20,326	26,778	6,452	31.7%
Central Lancashire	66,626	85,856	19,230	28.9%

Source: Derived from demographic modelling and Census (2011)

- 10.20 The figure below shows the tenures of people with a LTHPD – it should be noted that the data is for population living in households rather than households. The analysis clearly shows that people with a LTHPD are more likely to live in social rented housing and are also more likely to be outright owners (this will be linked to the age profile of the population with a disability). Given that typically the lowest incomes are found in the social rented sector and to a lesser extent for outright owners the analysis would suggest that the population/households with a disability are likely to be relatively disadvantaged when compared to the rest of the population.

Figure 57: Tenure of people with LTHPD – Central Lancashire



Source: 2011 Census

10.21 The table below shows further information about the tenure split of the household population with a LTHPD. This shows that people living in the social rented sector are nearly twice as likely to have a LTHPD than those in other tenures.

Table 93: Tenure of people with a LTHPD

	% of social rent with LTHPD	% of other tenures with LTHPD
Central Lancashire	30.9%	15.7%

Source: 2011 Census

Older Persons' Housing Needs

10.22 Given the ageing population and higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options moving forward. The analysis in this section draws on data from the Housing Learning and Information Network (Housing LIN) along with demographic projections to provide an indication of the potential level of additional specialist housing that might be required for older people in the future.

Current Stock of Specialist Housing

10.23 The table below shows the current supply (stock) of specialist housing for older people. This is split between sheltered housing (which contains two categories) and extra-care housing; analysis is also provided of the tenure of the housing (split between market and affordable). The categories of specialist housing are defined as:

- *Sheltered housing:* Schemes/properties are included where some form of scheme manager (warden) service is provided on site on a regular basis but where no registered personal care is

provided. A regularly visiting scheme manager service may qualify as long as s/he is available to all residents when on site. An on-call-only service does not qualify a scheme to be included in sheltered stats. In most cases schemes will also include traditional shared facilities - a residents' lounge and possibly laundry and garden.

- *Enhanced sheltered housing.* Schemes/properties are included where service provision is higher than for sheltered housing but below extra care level. Typically, there may be 24/7 staffing cover, at least one daily meal will be provided and there may be additional shared facilities.
- *Extra care housing:* Schemes/properties are included where care (registered personal care) is available on site 24/7.

10.24 At present, it is estimated that there are just under 3,300 units of specialist accommodation across the HMA; this is equivalent to 117 units per 1,000 people aged 75 and over. The analysis shows a significantly higher proportion of the stock is in the affordable than the market sector (88% vs. 12%).

Table 94: Current Supply (Stock) of Specialist Housing for Older People

	Type of housing	Market	Affordable	Total	Supply per 1,000 aged 75+
Chorley	Sheltered	78	708	786	90
	Extra-Care	0	24	24	3
	Total	78	732	810	93
Preston	Sheltered	190	1,043	1,233	129
	Extra-Care	0	74	74	8
	Total	190	1,117	1,307	136
South Ribble	Sheltered	115	976	1,091	112
	Extra-Care	0	74	74	8
	Total	115	1,050	1,165	119
Central Lancashire	Sheltered	383	2,727	3,110	111
	Extra-Care	0	172	172	6
	Total	383	2,899	3,282	117

Source: Housing LIN

Projected Future Need for Specialist Housing

10.25 A toolkit has been developed by Housing LIN, in association with the Elderly Accommodation Council and endorsed by the Department of Health, to identify potential demand for different types of specialist housing for older people and model future range of housing and care provision. It suggests that there should be around 170 units of specialised accommodation (other than registered care home places) per thousand people aged over 75 years.

10.26 The table below shows the change in the population aged 75 and over and what this would mean in terms of provision at 170 units per 1,000 population. The analysis shows a potential need for around 3,400-3,500 units – 168-173 per annum in the 2014-34 period – this is between 15% and 18% of the total need identified in the demographic modelling. The table below also provides annual figures for each of the local authorities. Generally, needs are projected to be lower in Preston than other areas, this reflects the age profile of the area.

Table 95: Projected need for Specialist Housing for Older People (2014-34) – Central Lancashire

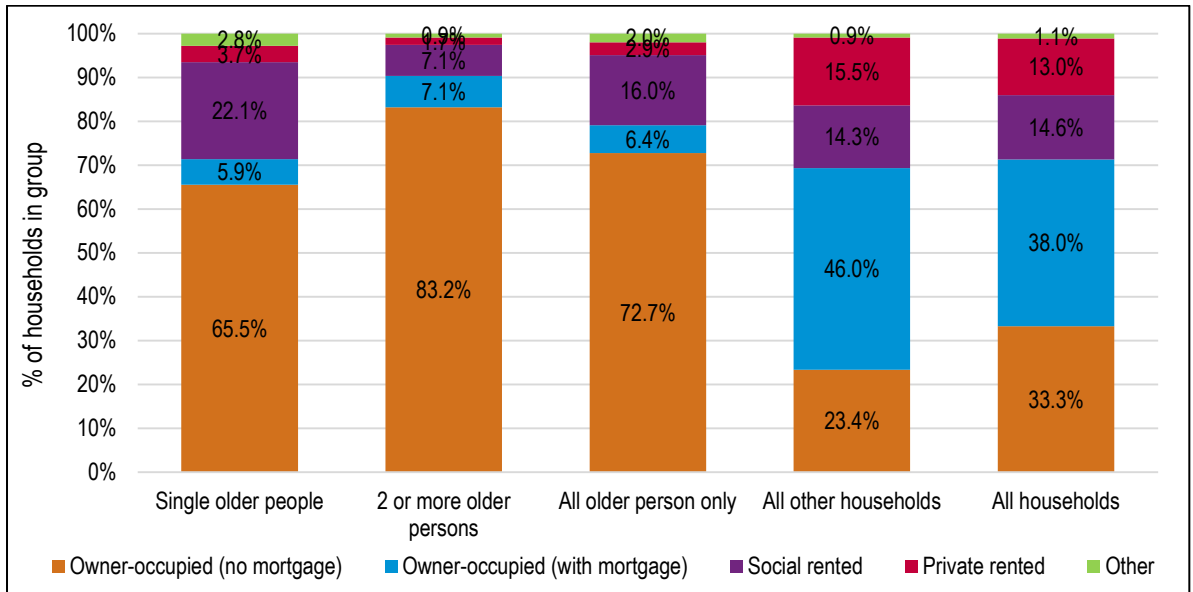
	2014-based SNPP	15-year migration
Population aged 75+ (2014)	27,504	27,504
Population aged 75+ (2034)	47,300	47,838
Change in population aged 75+	19,796	20,334
Specialist housing need (@ 170 units per 1,000)	3,365	3,457
Per annum need (2014-34)	168	173
Chorley	74	72
Preston	37	38
South Ribble	58	62

Source: Derived from demographic projections and Housing LIN

Types and Tenures of Specialist Housing

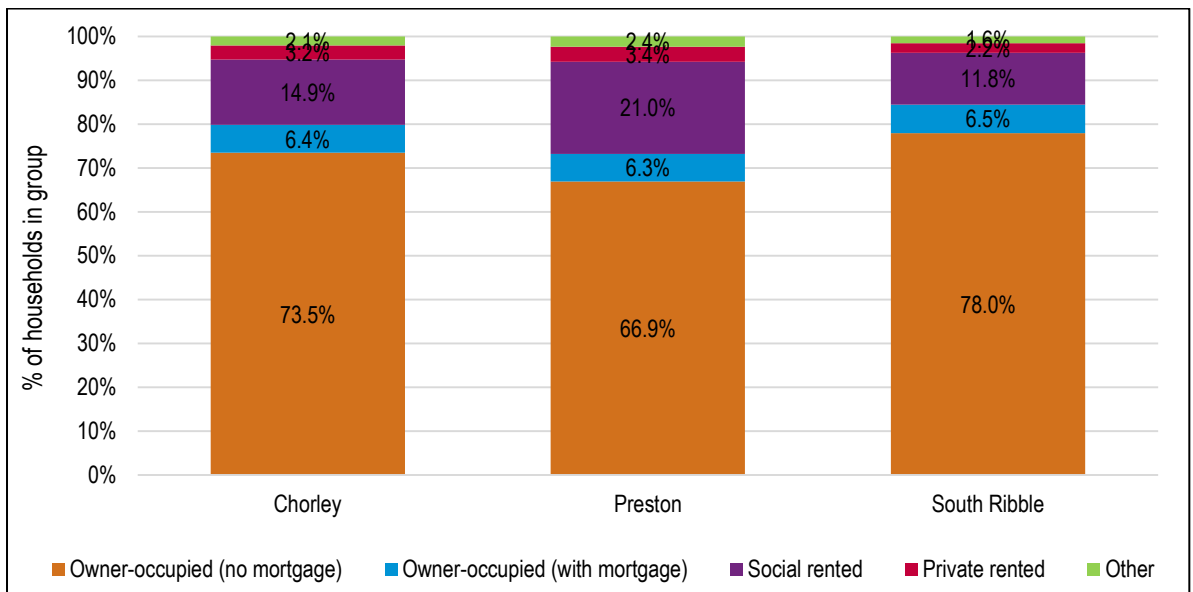
- 10.27 The figure below shows the tenure of older person households – the data has been split between single older person households and those with two or more older people (which will largely be couples). The data shows that older person households are relatively likely to live in outright owned accommodation (73%) and are also slightly more likely than other households to be in the social rented sector. The proportion of older person households living in the private rented sector is relatively low (3% compared with 13% of all households in the HMA).
- 10.28 There are however notable differences for different types of older person households with single older people having a much lower level of owner-occupation than larger older person households – this group also has a much higher proportion living in the social rented sector.
- 10.29 Given that the number of older people is expected to increase in the future and that the number of single person households is expected to increase this would suggest (if occupancy patterns remain the same) that there will be a notable demand for affordable housing from the ageing population. That said, the proportion of older person households who are outright owners (with significant equity) may mean that market solutions will also be required to meet their needs.
- 10.30 For individual local authorities (data in the second figure below) the tenure profile of older persons is broadly similar; although Preston sees a lower level of outright ownership (and more households in the social rented sector); the opposite being the case in South Ribble. The data shown is for all older person households (i.e. combining single person households and those with two or more older people).

Figure 58: Tenure of Older Person Households – Central Lancashire (2011)



Source: 2011 Census

Figure 59: Tenure of Older Person Households – by local authority (2011)



Source: 2011 Census

10.31 The analysis therefore shows that the current profile of older person households is significantly biased towards outright ownership, with the current supply having a notably higher proportion of affordable homes. Moving forward, it is suggested that additional specialist housing should be split roughly 60:40 between the market and affordable sectors. This reflects the likely ‘market’ for specialist housing products as well as the current tenure profile of older person households (including the likely increase in the number of single person older households where levels of home ownership are slightly lower). The 60:40 split is consistent with suggestions by Housing LIN¹⁴.

¹⁴ See: http://www.housinglin.org.uk/library/Resources/Housing/Support_materials/Reports/MCGVdocument.pdf

- 10.32 The analysis is not specific about the types of specialist housing that might be required; we would consider that decisions about mix should be taken at a local level taking account of specific needs and the current supply of different types of units available (for example noting that at present the dominant type of housing is traditional sheltered accommodation). There may also be the opportunity moving forward for different types of provision to be developed as well as the more traditional sheltered and Extra-Care housing.
- 10.33 Within the different models and assumptions made regarding the future need for specialist retirement housing (normally defined as a form of congregate housing designed exclusively for older people which usually offers some form of communal space, community alarm service and access to support and care if required), there may for example be an option to substitute some of this specialist provision with a mix of one and two bedroomed housing aimed to attract 'early retired' older people which could be designated as age specific or not. Such housing could be part of the general mix of one and two bedroom homes but built to Lifetime Homes standards in order to attract retired older people looking to 'down size' but perhaps not wanting to live in specialist retirement housing.
- 10.34 Our experience when carrying out stakeholder work as part of other similar commissions typically identifies a demand for bungalows. Where developments including bungalows are found it is clear that these are very popular to older people downsizing. It should be acknowledged that providing significant numbers of bungalows involves cost implications for the developer given the typical plot size compared to floor space – however providing an element of bungalows should be given strong consideration on appropriate sites, allowing older households to downsize while freeing up family accommodation for younger households.

Registered Care Bedspaces (C2 use class)

- 10.35 As well as the need for specialist housing for older people the analysis needs to consider Registered Care. As with the analysis of potential need for specialist accommodation, the analysis below considers changes to the number of people aged 75 and over who are expected to be living in some form of institutional housing. This is a direct output of the demographic modelling which indicates an increase of 1,850-1,900 people living in institutions over the 2014-34 period (92-94 per annum). These figures are important to note if the Councils intend to include C2 class uses in their assessment of 5-year housing land supply as it will be necessary to include figures on both the need and supply side of the equation.

Table 96: Potential Need for Residential Care Housing (2014-34) – Central Lancashire

	2014-based SNPP	15-year migration
Institutional population aged 75+ (2014)	2,178	2,178
Institutional population aged 75+ (2034)	4,024	4,067
Change in institutional population aged 75+	1,846	1,889
Per annum 'need' (2014-34)	92	94
Chorley	44	43
Preston	20	20
South Ribble	29	31

Source: Derived from demographic projections

Wheelchair User Housing

- 10.36 Information about the need for housing for wheelchair users is difficult to obtain (particularly at a local level) and so some brief analysis has been carried out based on national data within a research report by Habinteg Housing Association and London South Bank University (Supported by the Homes and Communities Agency) - *Mind the Step: An estimation of housing need among wheelchair users in England*. This report provides information at a national and regional level although there are some doubts about the validity even of the regional figures; hence the focus is on national data.
- 10.37 The report identifies that around 84% of homes in England do not allow someone using a wheelchair to get to and through the front door without difficulty and that once inside, it gets even more restrictive. Furthermore, it is estimated (based on English House Condition Survey data) that just 0.5% of homes meet criteria for 'accessible and adaptable', while 3.4% are 'visitable' by someone with mobility problems (data from the CLG Guide to available disability (taken from the English Housing Survey) puts the proportion of 'visitable' properties at a slightly higher 5.3%).
- 10.38 Overall, the report estimates that there is an unmet need for wheelchair adapted dwellings equivalent to 3.5 per 1,000 households – in Central Lancashire, as of 2014, this would represent a need for about 530 wheelchair adapted dwellings. Moving forward, the report estimates a wheelchair accessibility need from around 3% of households. If 3% is applied to the household growth in the demographic projections (2014-34) then there would be an additional need for around 545-683 wheelchair user homes. If this figure is brought together with the estimated current need then the total wheelchair user need would be for around 1,076-1,214 homes – this is about 5%-6% of the total household growth in the projections.

Table 97: Estimated need for wheelchair user homes (2014-2034) – Central Lancashire

		Current need	Projected need (2014-34)	Total	Total household growth	% wheelchair
Chorley	2014-based SNPP	164	299	464	9,968	4.7%
	15-year migration	164	245	409	8,161	5.0%
Preston	2014-based SNPP	203	139	342	4,648	7.4%
	15-year migration	203	233	436	7,762	5.6%
South Ribble	2014-based SNPP	163	107	270	3,560	7.6%
	15-year migration	163	206	369	6,859	5.4%
Central Lancashire	2014-based SNPP	531	545	1,076	18,176	5.9%
	15-year migration	531	683	1,214	22,783	5.3%

Source: Derived from demographic projections and Habinteg prevalence rates

- 10.39 Information in the CLG Guide to available disability data, also provides some historical national data about wheelchair users by tenure (data from the 2007/8 English Housing Survey). This showed around 7.1% of social tenants to be wheelchair users, compared with 2.3% of owner-occupiers (there was insufficient data for private renting, suggesting that the number is low). This may impact on the proportion of different tenures that should be developed to be wheelchair accessible (although it should be noted that the PPG (56-009) states that '*Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling*').

Specialist Housing Needs: Key Messages

- Planning Practice Guidance note 56 (Housing: optional technical standards) sets out how local authorities can gather evidence to set requirements on a range of issues (including accessibility and wheelchair housing standards, water efficiency standards and internal space standards). The SHMA considered the first two of these (i.e. accessibility and wheelchair housing) as well as considering the specific needs of older people. The SHMA draws on a range of data sources, as suggested by CLG and also some more traditionally used in assessments such as this (e.g. from Housing LIN). This is to consider the need for Building Regulations M4(2) (accessible and adaptable dwellings), and M4(3) (wheelchair user dwellings).
- The data shows that in general, Central Lancashire has a similar level of disability when compared with the national position, but that an ageing population means that the number of people with disabilities is expected to increase substantially in the future. Key findings include:
 - 46%-48% increase in the population aged 65+ (accounting for potentially over 100% of total population growth);
 - 15%-18% of household growth identified in the CLG projections to be specialist housing for older persons;
 - 65%-67% increase in the number of older people with mobility problems (representing around a fifth of all population growth);
 - 26%-29% increase in the number of people with a long-term health problem or disability (LTHPD) (representing at least 50% of all population growth);
 - concentrations of LTHPD in the social rented sector; and
 - a need for around 5%-6% of dwellings to be wheelchair adapted (M4(3))
- This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings. The exact proportion of homes in categories M4(2) and M4(3) is for the Council to consider based on this evidence and also any other relevant information (e.g. about viability). In seeking M4(2) compliant homes the Council should also be mindful that such homes could be considered as 'homes for life' and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.
- The Councils should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

11 CONCLUSIONS AND RECOMMENDATIONS

- 11.1 This final section brings together the findings of the SHMA Report. It is structured to set out GL Hearn's conclusions in turn: regarding the geography of the housing market area; the overall objectively assessed need for housing; findings relating to the need for different types of homes.
- 11.2 It should be reiterated that **the OAN figure is not the housing target**. It is an input to determining or reviewing housing targets in local plans alongside wider evidence. The housing target itself will be informed by the OAN but will also take into account wider factors such as sustainability, infrastructure constraints and land availability. It may also be necessary to take into account the unmet needs of neighbouring housing market areas.

Housing and Functional Economic Market Areas

- 11.3 The balance of evidence across the three local authorities suggests that they fall within a single and common housing market area. In market-terms (as reflected in the house price analysis) there are some distinction particularly in relation to the urban areas of Preston and more rural areas of Chorley, South Ribble and indeed northern Preston. However for some products, such as semi-detached homes, house prices are almost identical.
- 11.4 Both migration and Travel to Work patterns identify a degree of self-containment which approaches or exceeds expected thresholds for housing market areas. Preston has a high level of self-containment in its own right influenced by its size, but together the self-containment level increases with over 80% self-containment of migration flows (excluding long distance) shown across the three authorities together. There are clear migration and commuting relationships between the three authorities which fall within a common Travel to Work Area, which extends to include some parts of Wyre, Fylde and Ribble Valley administrative areas.
- 11.5 In GL Hearn's view, the triangulation of the sources strongly supports defining a single HMA and FEMA across the Central Lancashire area.
- 11.6 It is however important to recognise overlaps between authorities and markets in this area. As with any HMA, the boundaries are porous and overlapping. In the context of the Duty to Cooperate, the authorities should continue to engage on strategic housing issues – not only in the preparation of the SHMA but also the subsequent development or review of plan policies – with most of their neighbouring authorities, in particular Wyre, Fylde and Ribble Valley, Bolton, Wigan, Blackpool and West Lancashire administrative areas.

Housing Need

- 11.7 The report has followed the approach set out in the PPG to defining housing need. It has started out by considering trend-based demographic projections; and then considered whether there is a case

for adjusting the assessed housing need – to either support economic growth, or improve affordability (taking account of evidence from market signals and of affordable housing need).

Demographic Analysis

- 11.8 In line with the NPPF and PPG (and reflecting the recent St Modwen's decision) housing need should be across the HMA, with the authorities then working together to meet the need identified where it is sustainable to do so.
- 11.9 The HMA has a baseline population of just over 350,000 people. The latest official household projections are CLG 2014-based Household Projections. These expect an increase of around 18,200 households between 2014-34, equivalent to 12% household growth. This is based on a 7% increase in population.
- 11.10 Updating these figures to take account of the latest population estimates increases the growth across the HMA to just over 19,000 for the same period, equivalent to 12.5% household growth; with a 7.4% increase in population.
- 11.11 The short-term migration trends feeding into the official projections have however been below longer-term migration trends across the HMA. Taking account of the latest mid-year population estimates and returning migration levels back to that seen over the last 15-years would see the population growth increase by some 10.2%. It is suggested in drawing conclusions, both the official (2014-based) and the 15-year trends should be used to understand potential housing need. These projections set out a range of population growth of up to 10.2%. They provide a set of parameters for how the population could be expected to grow on a trend basis.
- 11.12 The household formation rates in the 2014-based household projections have been examined and notwithstanding local variation appear reasonable. There is no substantive evidence that these project forward suppressed household formation based on interrogation of the data. Furthermore the majority of historic change/suppression can be attributed to structural changes in the population.
- 11.13 Applying the 2014-based household formation rates to the longer-term migration trends scenario suggests a need for about 1,171 dwellings per annum across the HMA for the 2014 to 2034 period.
- 11.14 Both the scale and geography of housing need are influenced by the period from migration is projected, with the conclusions pointing to a demographic-led need for housing of between 923 – 1,171 dpa across the HMA (2014-34). The different demographic scenarios show variation in the distribution of housing need within the HMA, influenced in part by migration dynamics within the HMA. The evidence points to net out-migration from Preston to South Ribble and Chorley.

Supporting Economic Growth

- 11.15 We have purchased forecasts for the Central Lancashire HMA from Oxford Economics. These showed a growth of employment at around 515 jobs per annum. These forecasts were augmented with information from each of the local authorities in relation to factors which could result in a higher level of employment growth than the baseline forecasts. This planned growth scenario result in a job growth of 766 jobs per annum. The SHMA identifies these as parameters for economic growth.
- 11.16 The 15 year migration scenario supports growth in the economically active population of 16,100 across the HMA. This exceeds the economic growth in the Planned Growth Scenario of 15,300 (2014-34).
- 11.17 The economic-led scenarios modelled show a need for housing between 1,031 – 1,184 dpa across the Housing Market Area. At 1,184 dwellings per annum across the HMA, the resultant housing need from the economic-led need is broadly similar to the higher end of the demographic-led projections, suggesting that this is a reasonable projection scenario.
- 11.18 However workforce growth is expected to be strongest in Preston, influenced by its younger population structure; whereas jobs growth is expected to be stronger in South Ribble and Chorley. The issue which arises is particularly one of spatial distribution of housing provision. The evidence points to the three authorities sitting in a common Travel to Work Area and shows strong commuting and migration inter-relationships between them. In GL Hearn's experience, stronger weight should also be given to the realism of assessments of economic growth at the HMA level given the complexity of influences on future economic performance and the inter-relationship between this and housing need.
- 11.19 The distribution of housing can be achieved through considering and potentially agreeing a distribution of housing provision through the Duty to Cooperate.

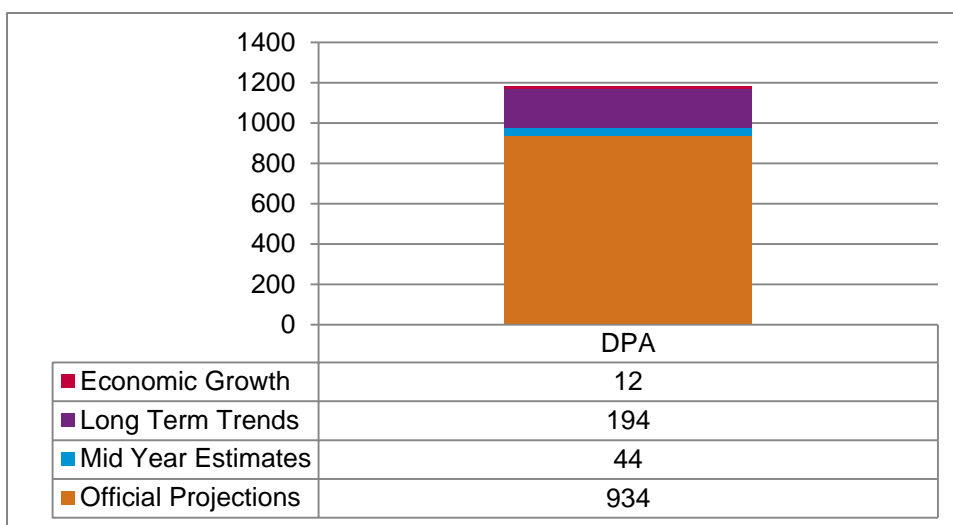
Affordable Housing Need and Market Signals

- 11.20 The report has considered the need for affordable housing; using the Basic Needs Assessment Model recommended in the PPG. Using the available information, it identifies a net need for 620 affordable homes per annum across the HMA for the 2014-34 period.
- 11.21 As the report explains this would represent the 'theoretical need' for affordable homes if all households who needed some form of support in meeting their housing need were to be allocated an affordable home. However the affordable needs calculations include the needs arising from existing households who require an alternative type/ size of home (and would thus release their current homes) and from newly forming households who are already included in the demographic growth.

- 11.22 The analysis of market signals points to house prices which are generally below the national trends and above the regional trends in South Ribble and Chorley and generally below both in Preston. The evidence does not point to particular 'market imbalance' across the whole housing market area. There is however some evidence that affordability deteriorated over the 2001-11 period. Over this period – like in many areas across the country – levels of renting grew and home ownership fell. However the recent evidence is of reasonable stable house prices in real terms, and a real term fall in rents in two of the authorities.
- 11.23 Any response to market signals should be proportionate and applied to the baseline demographic "starting point". However across the HMA the economic-led scenario is already 27% above the "starting point" while the longer term trend demographic output is 25% above it. Therefore the use of any of these scenarios would make a positive contribution to addressing affordability issues.

OAN Conclusions

- 11.24 The SHMA brings this analysis together and draws conclusions on overall objectively-assessed housing need (OAN) at both an HMA level and for individual authorities. Greater weight should be given to the HMA-level conclusions.
- 11.25 At the HMA level, the demographic starting point (2014-based SNPP) is a need for 934 dpa (2014-34). A 10 year migration would see this fall slightly to 923 dpa, whilst a 15 year scenario would see a need for 1,171 dpa.
- 11.26 The evidence does not show acute affordability issues or a particular imbalance between supply/demand within the HMA. There is evidence of affordable housing need in all three authorities, which would however justify consideration of an upward adjustment in drawing conclusions on OAN. Our analysis finds that a 10% upward adjustment could be warranted to the demographic starting point in Chorley and South Ribble, based on the market signals and affordable housing evidence. This results in a need across the HMA of 1,003 dwellings.
- 11.27 The economic evidence however suggests that additional in-migration could be required to support employment growth. The economic-led scenarios show a need for between 1,031 – 1,184 dpa. The consistency of the higher end of the range with the 15 year migration trend scenarios shows that it is realistic. GL Hearn conclude that the OAN is for 1184 dpa across the Central Lancashire HMA over the 2014-34 period. The derivation of the objectively-assessed need for the HMA is as shown below.

Figure 60: Objectively-Assessed Housing Need, Dwellings per annum, 2014-34

11.28 The spatial distribution of need within the HMA varies depending on judgements made on projections. There has been a historical over-delivery of homes in Chorley relative to housing requirement policies, compared to an under-delivery in Preston and South Ribble. Economic growth is expected to be stronger in Chorley and South Ribble, but there is a younger population structure in Preston which will see stronger workforce growth. There are choices to be made about where employment and housing growth are directed in this respect.

11.29 At an local authority basis, we have therefore drawn conclusions on OAN expressed as a range:

- Chorley: 419- 519 dpa;
- Preston: 225 - 402 dpa;
- South Ribble: 351- 440 dpa;

11.30 However primacy should be given to the HMA-level conclusions in line with national policy which emphasises assessment of OAN at a housing market area level.

11.31 Furthermore GL Hearn considers that where an authority is meeting the unmet needs from another, this will support population and workforce growth within the receiving authority's area. On this basis it is important not to double count unmet needs and provision to meet economic growth.

Housing Mix

11.32 Overall, a net need for 640 affordable homes per annum across the HMA for the 2014-34 period has been identified, based on a sliding affordability threshold). There is thus a requirement for new affordable housing in the HMA (and each District) and the Councils are justified in seeking to secure additional affordable housing.

11.33 The analysis undertaken suggests that of the affordable need, as currently defined in the NPPF, 12% of the need is for intermediate housing and 88% for social/ affordable rent.

11.34 There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability.

11.35 The analysis linked to long-term (2014-34) demographic change concludes that the table below represents an appropriate mix of affordable and market homes.

Table 98: Recommended Housing Mix by Size and Tenure

	1-bed	2-bed	3-bed	4+ bed
Market	0-5%	25-30%	50-55%	15-20%
Low-cost home ownership	15-20%	40-45%	30-35%	5-10%
Affordable housing (rented)	35-40%	30-35%	20-25%	5-10%

11.36 The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.

11.37 The mix identified above should inform strategic policies. In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.

11.38 The analysis of an appropriate mix of dwellings should also inform the 'portfolio' of sites which are considered by each local authority through its local plan process. Equally it will be of relevance to affordable housing negotiations.

11.39 The analysis within the main report also looked at the housing mix in each of the three local authority areas. Whilst there were differences between locations, it is not considered that these are so great as to point towards a different profile of new housing being needed when compared to HMA level findings.

Needs of Specific Groups

11.40 The SHMA draws on a range of data sources, as suggested by CLG and also some more traditionally used in assessments such as this (e.g. from Housing LIN). This is to consider the need for Building Regulations M4(2) (accessible and adaptable dwellings), and M4(3) (wheelchair user dwellings).

11.41 The data shows that in general, Central Lancashire has a similar level of disability when compared with the national position, but that an ageing population means that the number of people with disabilities is expected to increase substantially in the future. Key findings include:

- 46%-48% increase in the population aged 65+ (accounting for potentially over 100% of total population growth);

- 15%-18% of household growth identified in the CLG projections to be specialist housing for older persons;
- 65%-67% increase in the number of older people with mobility problems (representing around a fifth of all population growth);
- 26%-29% increase in the number of people with a long-term health problem or disability (LTHPD) (representing at least 50% of all population growth);
- concentrations of LTHPD in the social rented sector; and
- a need for around 5%-6% of dwellings to be wheelchair adapted (M4(3))

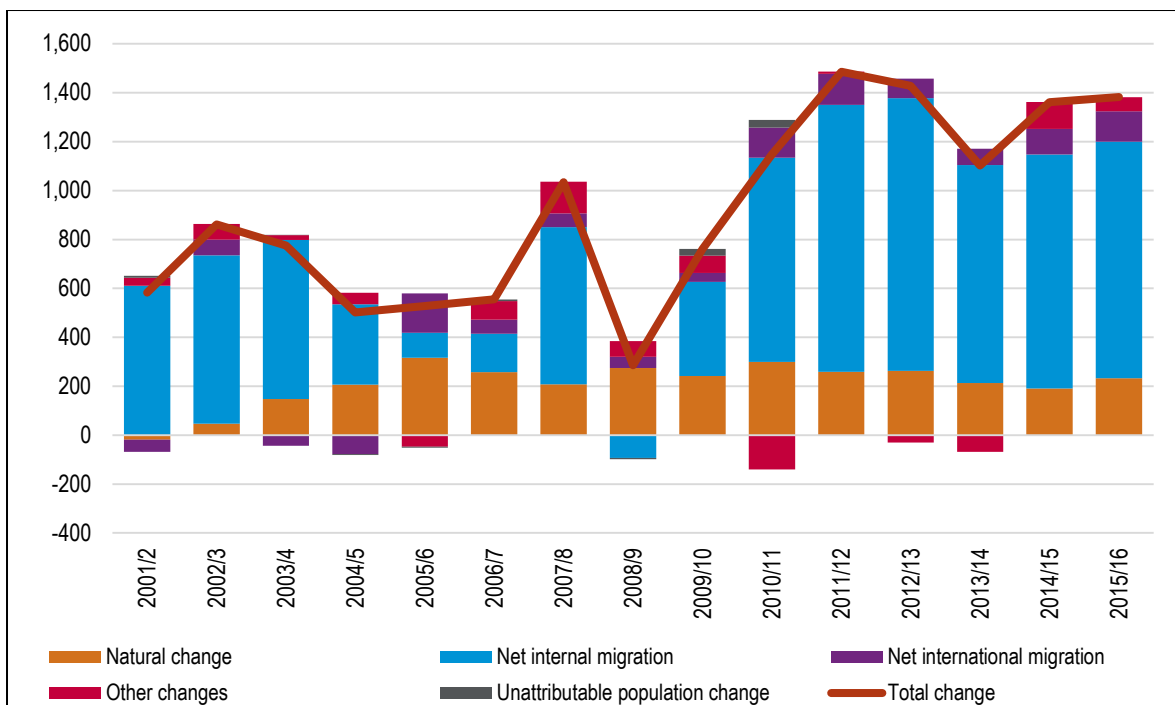
11.42 This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings. The exact proportion of homes in categories M4(2) and M4(3) is for the Council to consider based on this evidence and also any other relevant information (e.g. about viability).

11.43 The Councils should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

Appendices

APPENDIX A: Demographic Projections – Background Data

Figure 61: Components of population change, mid-2001 to mid-2016 – Chorley



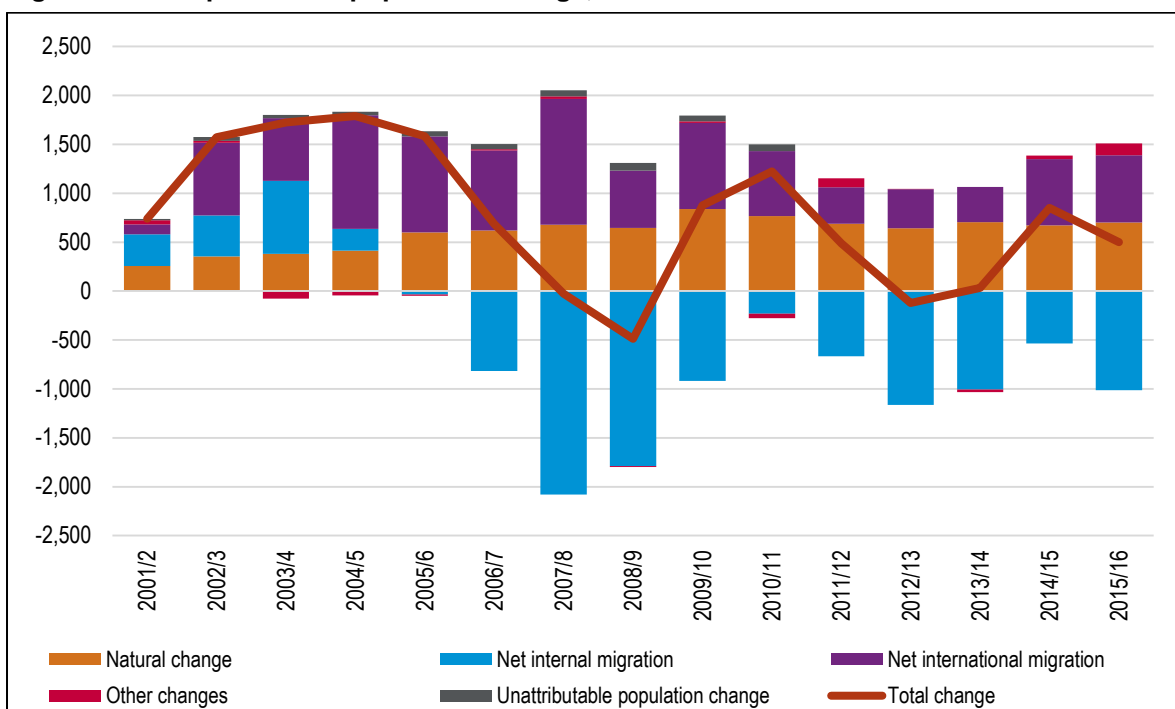
Source: ONS

Table 99: Components of population change, mid-2001 to mid-2016 – Chorley

Year	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	-19	611	-50	32	9	583
2002/3	47	688	65	64	-3	861
2003/4	148	650	-44	20	1	775
2004/5	207	328	-77	47	-4	501
2005/6	317	102	160	-48	-3	528
2006/7	258	157	57	76	7	555
2007/8	208	643	56	129	-2	1,034
2008/9	274	-93	46	65	-6	286
2009/10	242	384	37	71	27	761
2010/11	299	836	123	-141	31	1,148
2011/12	259	1,091	127	9	0	1,486
2012/13	263	1,115	80	-30	0	1,428
2013/14	213	892	66	-69	0	1,102
2014/15	191	956	105	110	0	1,362
2015/16	232	968	124	58	0	1,382

Source: ONS

Figure 62: Components of population change, mid-2001 to mid-2016 – Preston



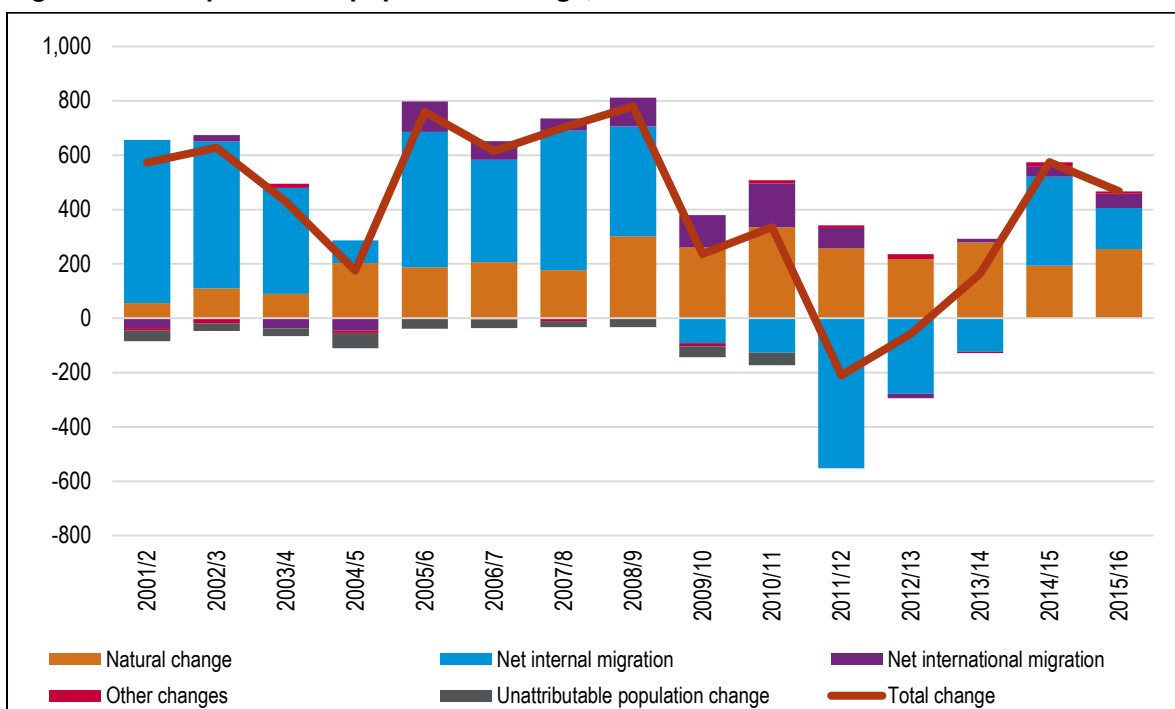
Source: ONS

Table 100: Components of population change, mid-2001 to mid-2016 – Preston

Year	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	255	326	101	41	15	738
2002/3	355	419	741	21	39	1,575
2003/4	382	745	642	-76	32	1,725
2004/5	413	223	1,163	-45	36	1,790
2005/6	599	-35	981	-14	53	1,584
2006/7	620	-818	818	13	53	686
2007/8	677	-2,079	1,289	24	62	-27
2008/9	646	-1,789	584	-9	81	-487
2009/10	839	-918	879	16	59	875
2010/11	766	-231	666	-47	69	1,223
2011/12	689	-668	371	94	0	486
2012/13	642	-1,164	399	2	0	-121
2013/14	703	-1,008	363	-25	0	33
2014/15	672	-536	678	36	0	850
2015/16	700	-1,012	689	122	0	499

Source: ONS

Figure 63: Components of population change, mid-2001 to mid-2016 – South Ribble



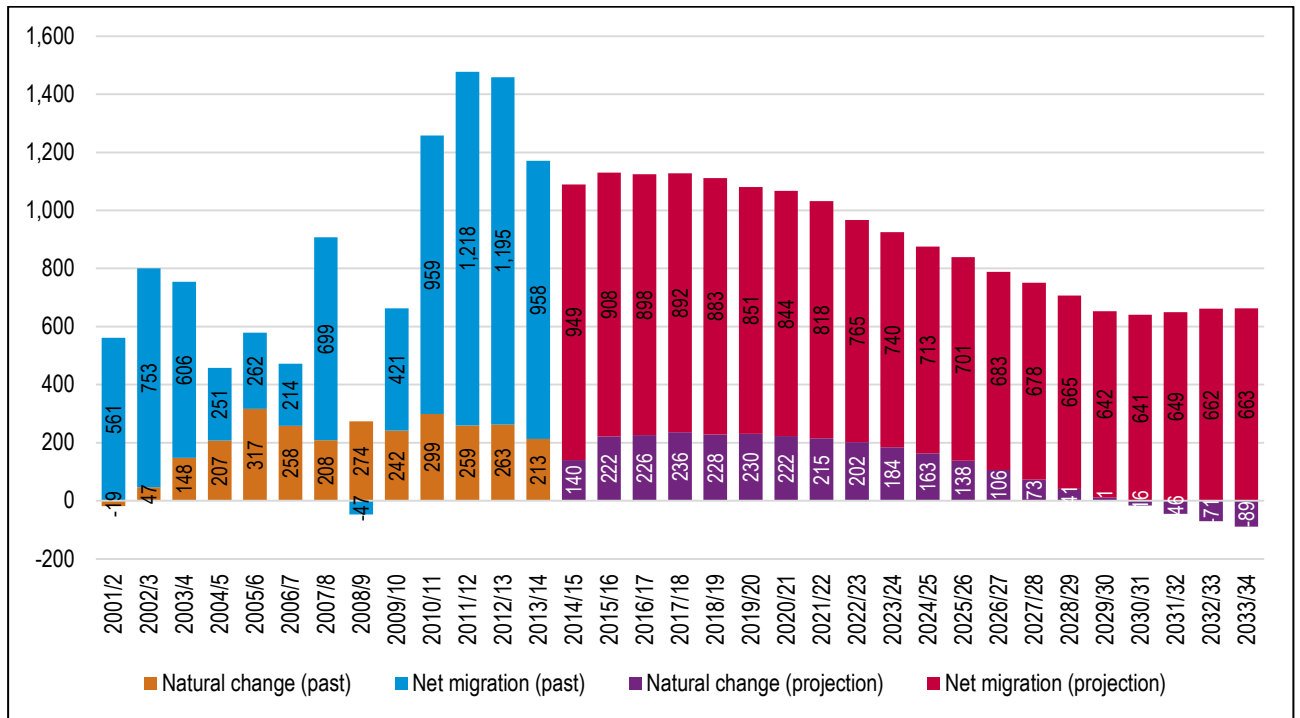
Source: ONS

Table 101: Components of population change, mid-2001 to mid-2016 – South Ribble

Year	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	56	601	-36	-10	-38	573
2002/3	110	540	24	-19	-28	627
2003/4	90	390	-37	15	-29	429
2004/5	203	83	-45	-9	-57	175
2005/6	187	499	112	-2	-37	759
2006/7	206	377	69	-5	-31	616
2007/8	177	513	45	-10	-23	702
2008/9	302	404	106	0	-33	779
2009/10	261	-92	119	-11	-40	237
2010/11	335	-127	161	12	-46	335
2011/12	257	-552	75	10	0	-210
2012/13	218	-278	-16	18	0	-58
2013/14	279	-124	13	-4	0	164
2014/15	194	327	36	17	0	574
2015/16	255	150	54	8	0	467

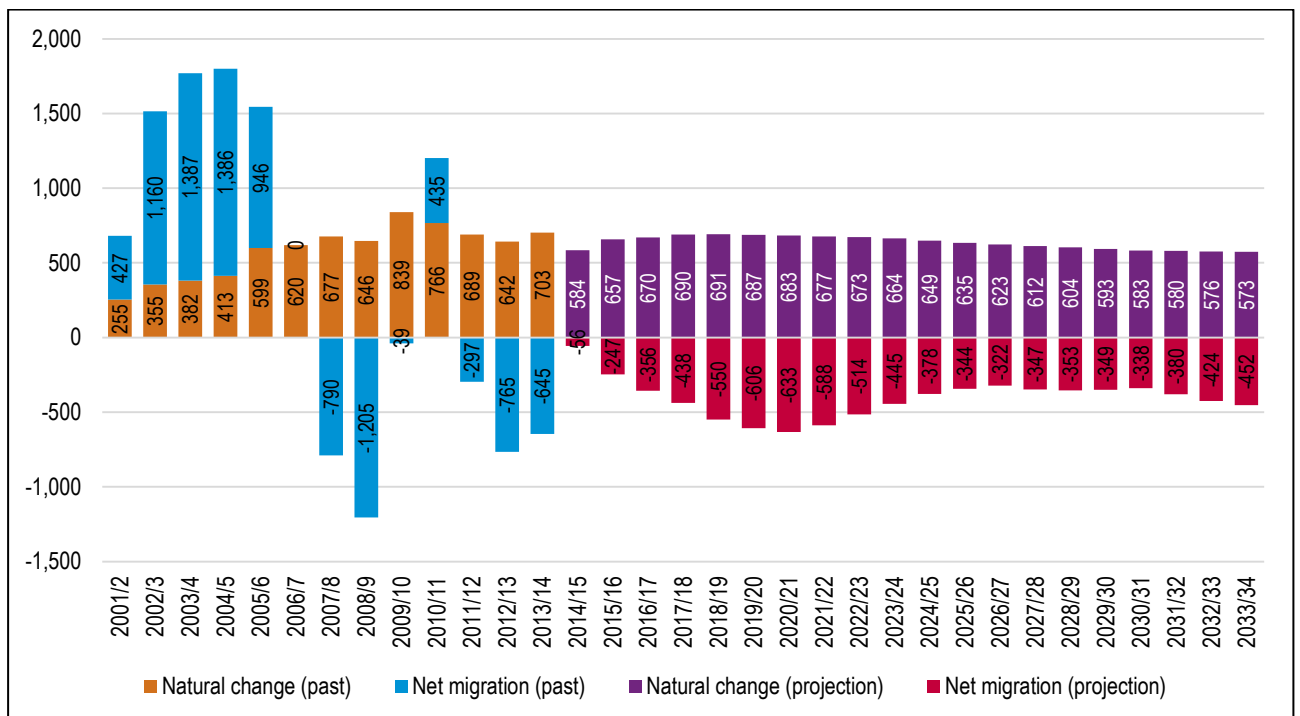
Source: ONS

Figure 64: Components of population change, mid-2001 to mid-2034 (summary chart) – Chorley



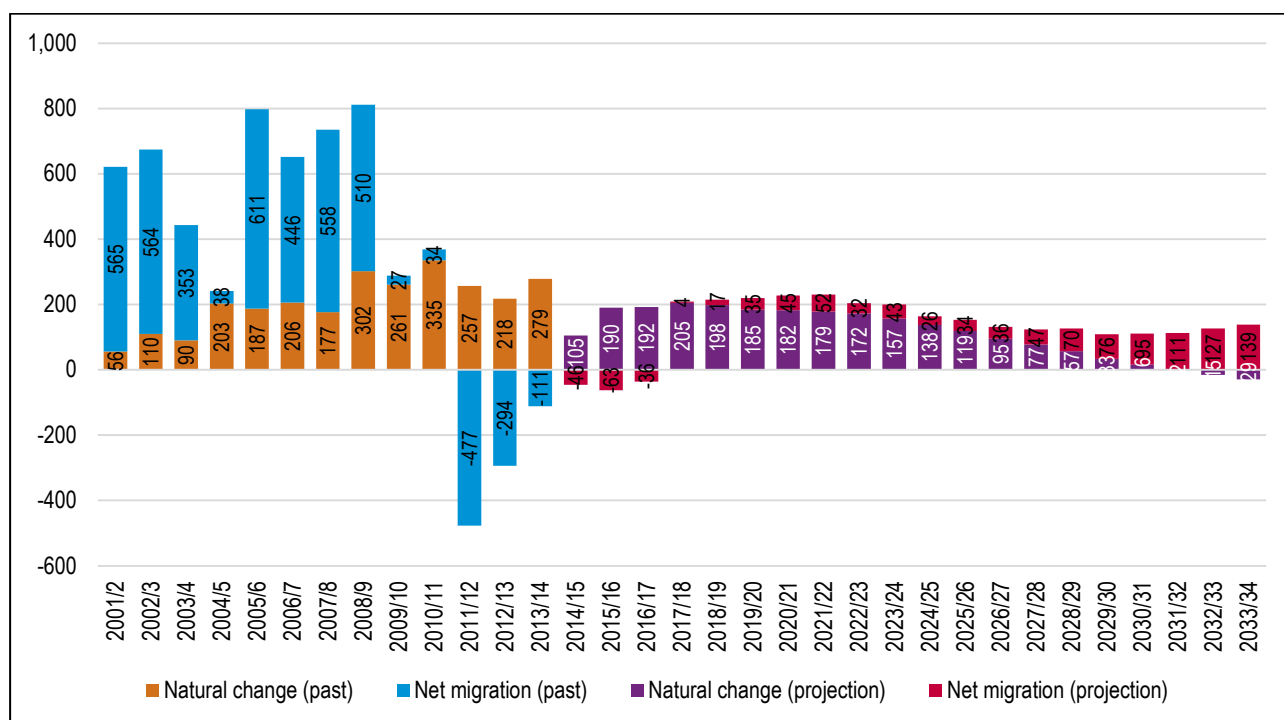
Source: ONS

Figure 65: Components of population change, mid-2001 to mid-2034 (summary chart) – Preston



Source: ONS

Figure 66: Components of population change, mid-2001 to mid-2034 (summary chart) – South Ribble



Source: ONS

Table 102: Population change 2014 to 2034 by fifteen-year age bands (2014-based SNPP) – Chorley

Age group	Population 2014	Population 2034	Change in population	% change from 2014
Under 15	19,181	21,183	2,002	10.4%
15-29	18,858	19,619	761	4.0%
30-44	22,018	23,287	1,269	5.8%
45-59	23,893	23,707	-186	-0.8%
60-74	19,243	24,463	5,220	27.1%
75+	8,414	17,101	8,687	103.2%
Total	111,607	129,360	17,753	15.9%

Source: ONS

Table 103: Population change 2014 to 2034 by fifteen-year age bands (2014-based SNPP) – Preston

Age group	Population 2014	Population 2034	Change in population	% change from 2014
Under 15	25,767	25,472	-295	-1.1%
15-29	34,476	35,739	1,263	3.7%
30-44	26,993	25,455	-1,538	-5.7%
45-59	26,267	22,605	-3,662	-13.9%
60-74	17,381	21,604	4,223	24.3%
75+	9,568	13,885	4,317	45.1%
Total	140,452	144,760	4,308	3.1%

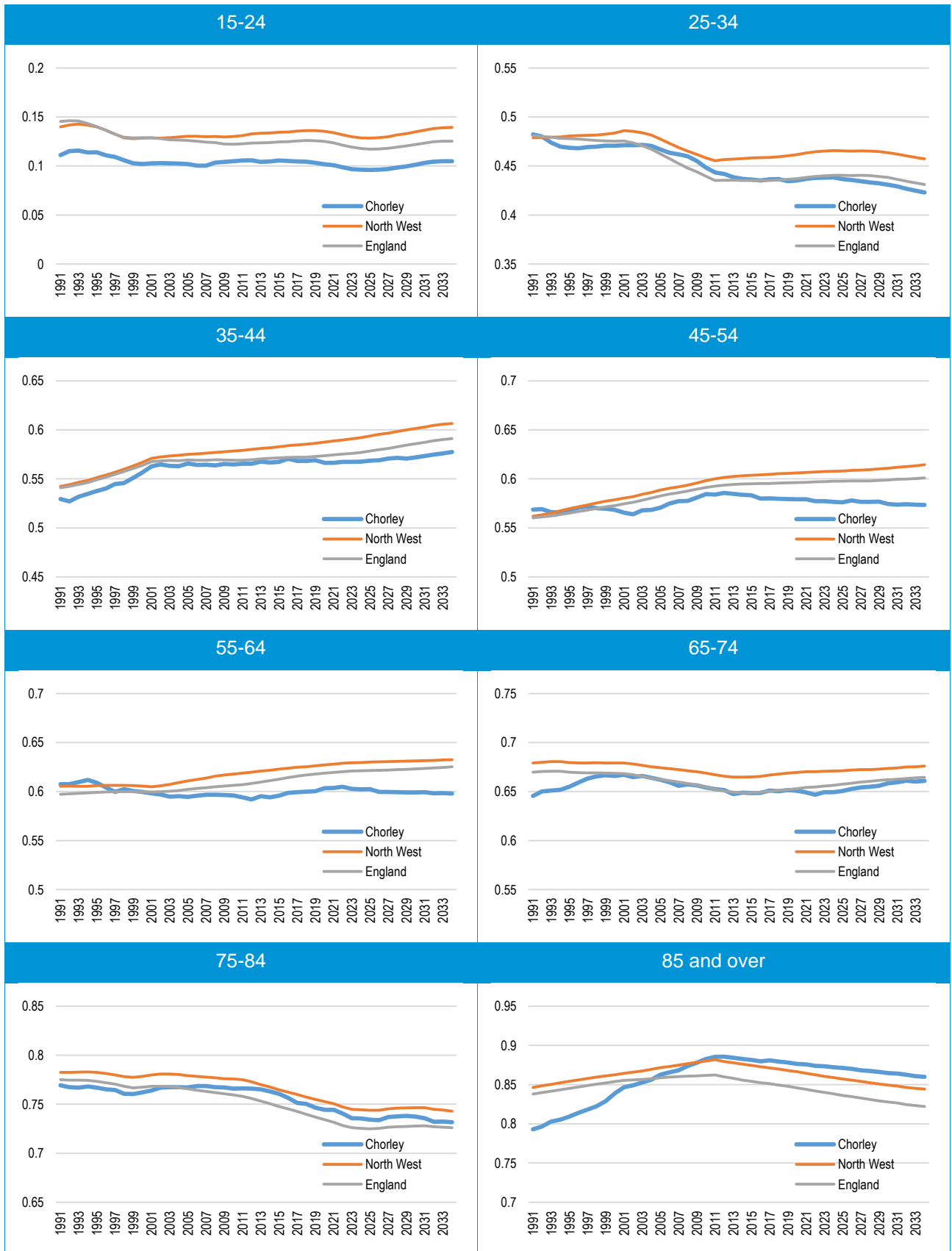
Source: ONS

Table 104: Population change 2014 to 2034 by fifteen-year age bands (2014-based SNPP) – South Ribble

Age group	Population 2014	Population 2034	Change in population	% change from 2014
Under 15	18,408	18,144	-264	-1.4%
15-29	18,617	17,643	-974	-5.2%
30-44	20,289	19,215	-1,074	-5.3%
45-59	23,358	19,062	-4,296	-18.4%
60-74	18,883	21,864	2,981	15.8%
75+	9,522	16,314	6,792	71.3%
Total	109,077	112,243	3,166	2.9%

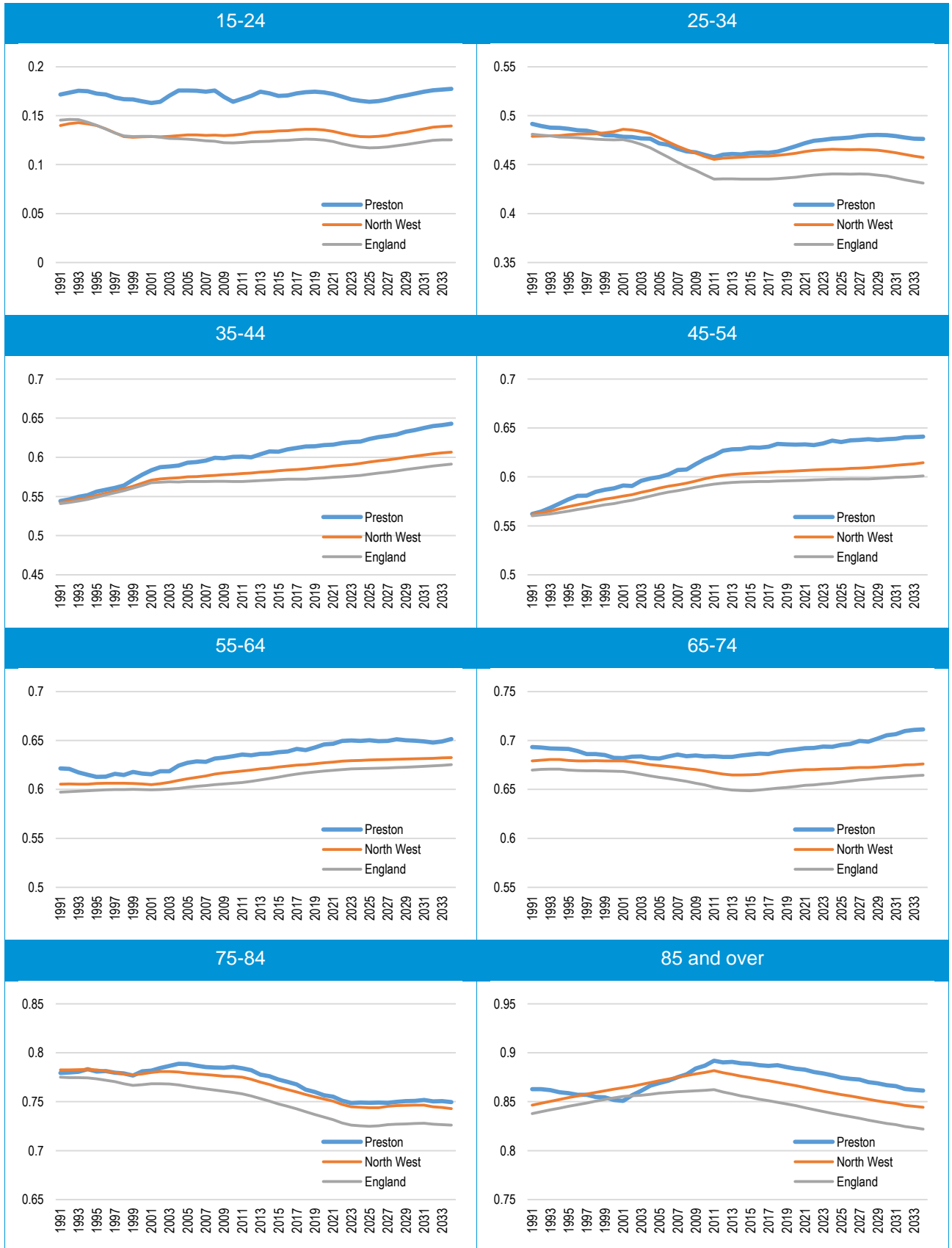
Source: ONS

Figure 67: Projected household formation rates by age of head of household – Chorley



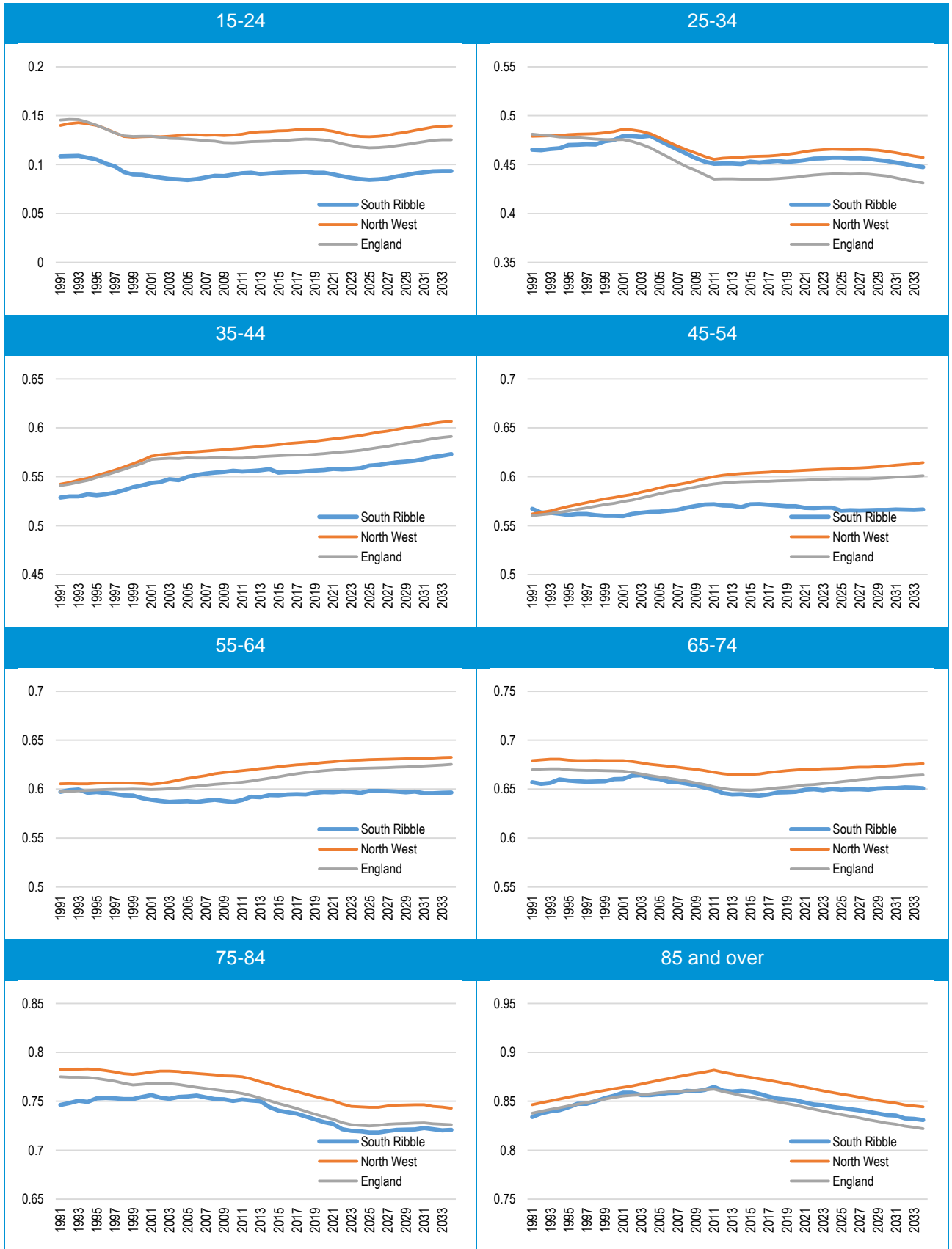
Source: Derived from CLG data

Figure 68: Projected household formation rates by age of head of household – Preston



Source: Derived from CLG data

Figure 69: Projected household formation rates by age of head of household – South Ribble



Source: Derived from CLG data

Table 105: Changes to Black and Minority Ethnic and White (British/Irish) Population by age (2001-11) – Chorley

	Black and Minority Ethnic			White (British/Irish)		
	Population 2001	Population 2011	Change	Population 2001	Population 2011	Change
15-24	389	638	249	10,748	11,625	877
25-34	507	932	425	13,472	11,548	-1,924
35-44	472	879	407	15,167	15,189	22
45-54	350	532	182	14,756	15,254	498
55-64	170	294	124	11,604	14,060	2,456
65-74	141	136	-5	7,570	10,245	2,675
75-84	79	85	6	4,770	5,335	565
85+	17	37	20	1,677	2,124	447
TOTAL	2,125	3,533	1,408	79,764	85,380	5,616

Source: Census (2001 and 2011)

Table 106: Changes to Black and Minority Ethnic and White (British/Irish) Population by age (2001-11) – Preston

	Black and Minority Ethnic			White (British/Irish)		
	Population 2001	Population 2011	Change	Population 2001	Population 2011	Change
15-24	4,123	6,258	2,135	15,530	18,253	2,723
25-34	3,747	7,008	3,261	15,403	13,064	-2,339
35-44	2,654	4,803	2,149	15,980	13,991	-1,989
45-54	1,857	2,938	1,081	13,875	15,188	1,313
55-64	1,135	1,819	684	11,109	12,433	1,324
65-74	877	918	41	9,369	8,991	-378
75-84	266	596	330	6,356	6,192	-164
85+	50	108	58	2,025	2,441	416
TOTAL	14,709	24,448	9,739	89,647	90,553	906

Source: Census (2001 and 2011)

Table 107: Changes to Black and Minority Ethnic and White (British/Irish) Population by age (2001-11) – South Ribble

	Black and Minority Ethnic			White (British/Irish)		
	Population 2001	Population 2011	Change	Population 2001	Population 2011	Change
15-24	355	587	232	10,978	12,235	1,257
25-34	386	929	543	13,426	11,480	-1,946
35-44	524	737	213	15,312	14,999	-313
45-54	376	565	189	14,724	15,303	579
55-64	227	284	57	11,801	13,953	2,152
65-74	144	163	19	8,732	10,544	1,812
75-84	81	71	-10	5,452	6,280	828
85+	30	27	-3	1,743	2,327	584
TOTAL	2,123	3,363	1,240	82,168	87,121	4,953

Source: Census (2001 and 2011)

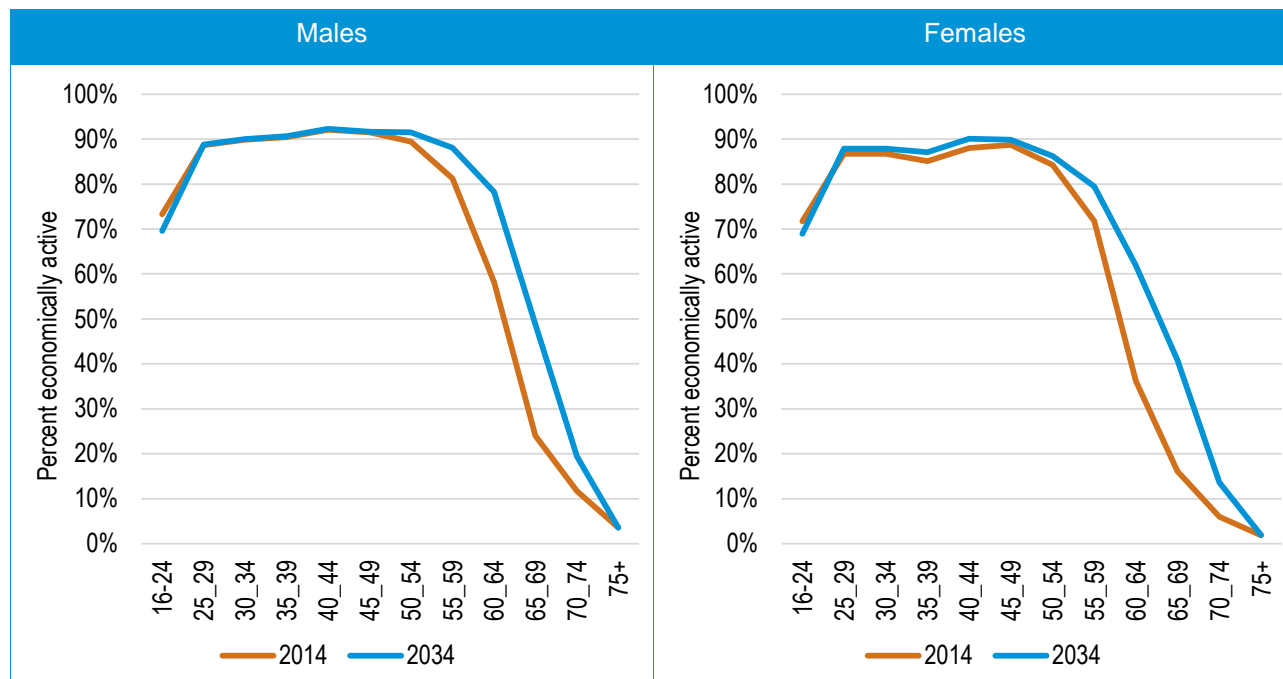
Table 108: Projected housing need – Start Point projection (2014-based CLG household projections)

	Chorley	Preston	South Ribble	Central Lancashire
2014/15	639	241	180	1,059
2015/16	648	278	220	1,145
2016/17	640	284	237	1,161
2017/18	613	242	241	1,096
2018/19	582	197	232	1,011
2019/20	578	192	212	981
2020/21	578	209	203	990
2021/22	538	193	202	933
2022/23	513	187	184	883
2023/24	505	218	185	908
2024/25	491	230	164	885
2025/26	514	278	182	974
2026/27	491	272	170	934
2027/28	466	279	156	900
2028/29	445	269	166	880
2029/30	426	267	144	837
2030/31	429	261	156	846
2031/32	388	250	143	780
2032/33	378	233	126	736
2033/34	361	236	139	737

Source: Demographic projections

APPENDIX B: Economic-led projections – additional background data

Figure 70: Projected changes to economic activity rates (2014-34) – Chorley



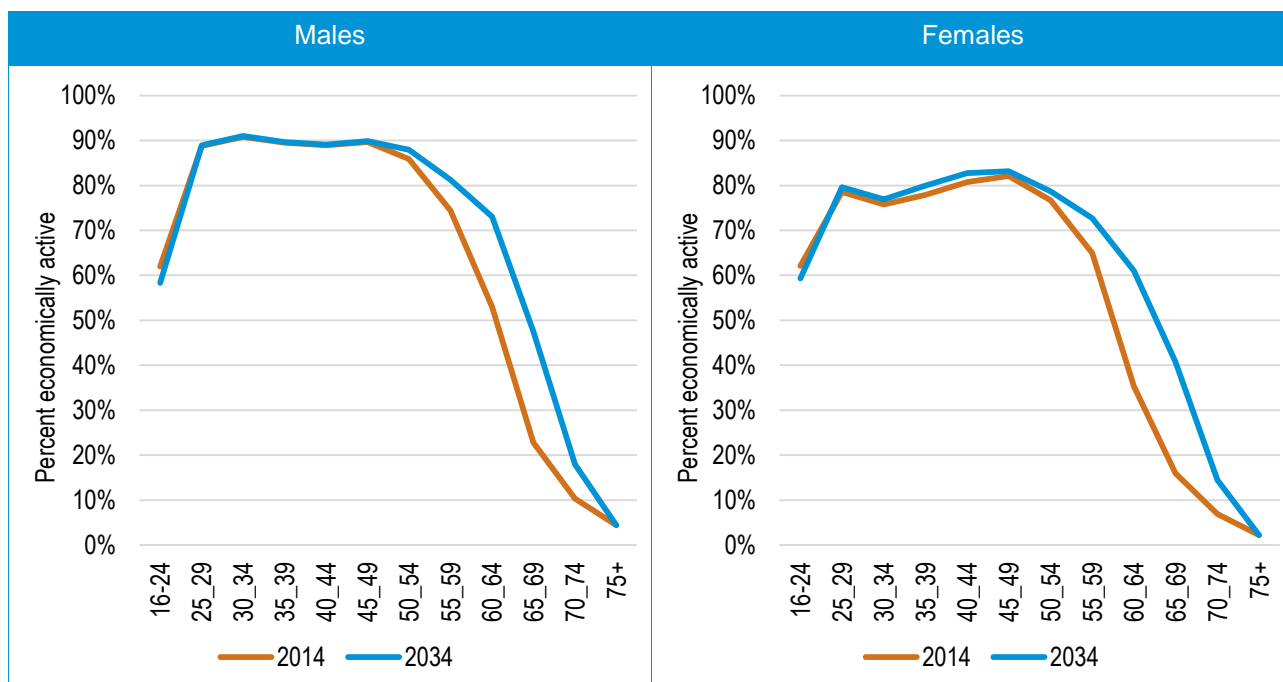
Source: Based on Experian and Census (2011) data

Table 109: Projected changes to economic activity rates (2014-34) – Chorley

	Males			Females		
	2014	2034	Change	2014	2034	Change
16-24	73.3%	69.6%	-3.7%	71.7%	68.9%	-2.7%
25-29	88.6%	88.8%	0.2%	86.8%	87.9%	1.1%
30-34	89.9%	90.0%	0.2%	86.8%	87.9%	1.1%
35-39	90.5%	90.6%	0.2%	85.1%	87.1%	2.0%
40-44	92.1%	92.3%	0.2%	88.0%	90.1%	2.1%
45-49	91.5%	91.7%	0.2%	88.7%	89.8%	1.1%
50-54	89.5%	91.5%	2.1%	84.2%	86.3%	2.0%
55-59	81.3%	88.1%	6.8%	71.8%	79.5%	7.7%
60-64	58.2%	78.2%	20.1%	36.2%	61.9%	25.7%
65-69	24.0%	48.7%	24.7%	16.1%	40.8%	24.7%
70-74	11.7%	19.3%	7.6%	6.0%	13.6%	7.6%
75+	3.6%	3.6%	0.0%	1.9%	1.9%	0.0%

Source: Based on Experian and Census (2011) data

Figure 71: Projected changes to economic activity rates (2014-34) – Preston



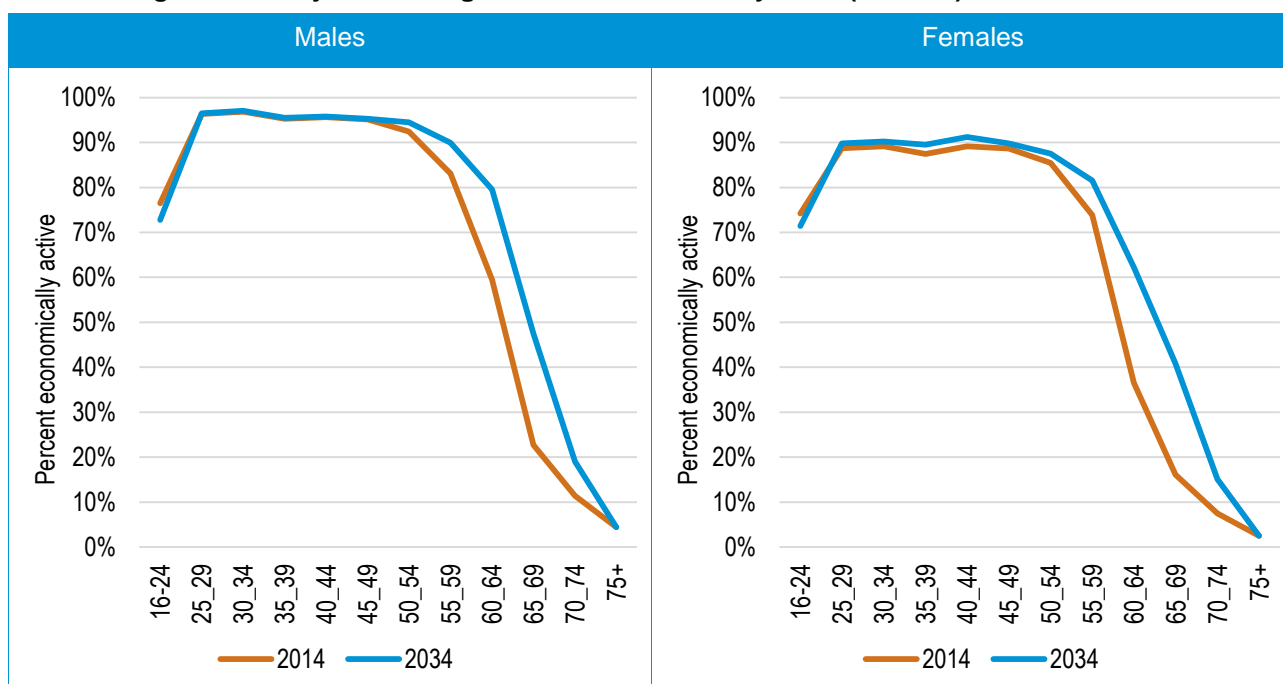
Source: Based on Experian and Census (2011) data

Table 110: Projected changes to economic activity rates (2014-34) – Preston

	Males			Females		
	2014	2034	Change	2014	2034	Change
16-24	62.0%	58.3%	-3.7%	62.1%	59.3%	-2.7%
25-29	88.8%	88.9%	0.2%	78.5%	79.6%	1.1%
30-34	90.8%	91.0%	0.2%	75.8%	76.9%	1.1%
35-39	89.5%	89.7%	0.2%	77.9%	80.0%	2.0%
40-44	88.9%	89.1%	0.2%	80.7%	82.8%	2.1%
45-49	89.7%	89.8%	0.2%	82.1%	83.2%	1.1%
50-54	85.9%	88.0%	2.1%	76.7%	78.7%	2.0%
55-59	74.4%	81.2%	6.8%	65.0%	72.7%	7.7%
60-64	53.0%	73.0%	20.1%	35.3%	61.0%	25.7%
65-69	22.8%	47.5%	24.7%	16.0%	40.7%	24.7%
70-74	10.3%	17.9%	7.6%	6.9%	14.5%	7.6%
75+	4.4%	4.4%	0.0%	2.2%	2.2%	0.0%

Source: Based on Experian and Census (2011) data

Figure 72: Projected changes to economic activity rates (2014-34) – South Ribble



Source: Based on Experian and Census (2011) data

Table 111: Projected changes to economic activity rates (2014-34) – South Ribble

	Males			Females		
	2014	2034	Change	2014	2034	Change
16-24	76.5%	72.8%	-3.7%	74.2%	71.4%	-2.7%
25-29	96.3%	96.5%	0.2%	88.7%	89.8%	1.1%
30-34	96.9%	97.0%	0.2%	89.1%	90.2%	1.1%
35-39	95.3%	95.5%	0.2%	87.5%	89.5%	2.0%
40-44	95.6%	95.8%	0.2%	89.2%	91.2%	2.1%
45-49	95.1%	95.3%	0.2%	88.7%	89.8%	1.1%
50-54	92.5%	94.5%	2.1%	85.4%	87.5%	2.0%
55-59	83.1%	89.9%	6.8%	73.8%	81.6%	7.7%
60-64	59.5%	79.5%	20.1%	36.5%	62.3%	25.7%
65-69	22.7%	47.5%	24.7%	16.1%	40.8%	24.7%
70-74	11.4%	19.0%	7.6%	7.5%	15.1%	7.6%
75+	4.4%	4.4%	0.0%	2.5%	2.5%	0.0%

Source: Based on Experian and Census (2011) data

APPENDIX 21:

Central Lancashire Housing Study (Iceni) (2020)



MARCH 2020

Central Lancashire Housing Study

Final Report

Iceni Projects Limited on behalf of
Chorley, Preston and South Ribble

March 2020

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ON BEHALF OF CHORLEY,
PRESTON AND SOUTH
RIBBLE

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Central Lancashire

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APPENDICES

A1. PROJECTED CHANGE IN HOUSEHOLD TYPES

1. INTRODUCTION

- 1.1 Icen Projects, on behalf of the Central Lancashire Councils – Chorley, Preston and South Ribble – have been commissioned to prepare this Housing Study in the context that the Councils are at an early stage of the preparation of the Review of the Central Lancashire Local Plan and there is a need to bring together key evidence in respect of housing need. The three Central Lancashire authorities fall within a common Housing Market Area (HMA).
- 1.2 The Housing Study has been commissioned to update and develop elements of the analysis set out in the Central Lancashire Strategic Housing Market Assessment (September 2017) and principally do two things:
- Advise on the scale of housing need and the interim distribution of housing across Central Lancashire to inform a revised Joint Memorandum of Understanding; and
 - Provide a robust up-to-date evidence base regarding the scale, type and mix of housing which is needed to inform the development of the local plan and consideration of the housing mix on individual development sites.
- 1.3 The introduction of the standard method for calculating local housing need and the age of the adopted Central Lancashire Core Strategy mean that the previously agreed Memorandum of Understanding¹ signed by all three local authorities on the level of housing need and distribution of housing across Central Lancashire needs to be revisited.
- 1.4 The Housing Study has been prepared to provide a robust and consistent basis for the Central Lancashire authorities to agree (a) an updated level of housing need to plan for across the Central Lancashire HMA; and (b) how this level of housing need is to be appropriately distributed across the three authorities through an updated Memorandum of Understanding (MOU).
- 1.5 The MOU may need to be reviewed over time to take account of new evidence. It will be for the Local Plan Review process to consider further both the level of overall housing provision and options for the distribution of housing development in Central Lancashire through the plan-making process; and this will involve further public consultation as the plan-making process progresses.

¹ Central Lancashire Strategic Housing Market - Joint Memorandum of Understanding and Statement of Co-Operation relating to the Objectively Assessed Need for Housing (September 2017)

1.6 A draft of this Housing Study was published on a draft revised Joint Memorandum of Understanding over a period of 7 weeks from 4th November – 15 November 2019 and 9th December 2019 – 13th January 2020. Icenis draft report was made available to consultees during this period. 37 responses to the consultation were received from a range of stakeholders. A report on the consultation responses was presented to Central Lancashire Strategic Planning Advisory Committee on 28th January 2020. Icenis contributed to reviewing responses within this report, which is available online.² Icenis has reviewed and considered key issues raised in the consultation responses – some of which touched on elements of the draft report – in finalising the Housing Study.

Structure of the Study

1.7 The structure of the remainder of the report is as follows:

- Section 2: National Planning Policy and Guidance
- Section 3: Overall Housing Need
- Section 4: The Distribution of Housing Need
- Section 5: Affordable Housing Need
- Section 6: Development Densities
- Section 7: Needs of Older Persons and those with Disabilities
- Section 8: Need for Different Sizes of Homes
- Section 9: Emerging Market Segments
- Section 10: Conclusions and Recommendations

² <https://democracy.chorley.gov.uk/documents/s107780/V2%20Report%2028.01.20%20MOU%20responses.pdf>

2. NATIONAL PLANNING POLICY AND GUIDANCE

- 2.1 This section sets out a brief overview of the national planning policy context which has emerged since the preparation of the Central Lancashire Strategic Housing Market Assessment (“SHMA”) (2017) in respect of assessing local housing need.

The Housing Market Geography

- 2.2 Planning Practice Guidance encourages authorities to work together to plan for housing need for functional housing market areas (HMAs).³ The HMA geography was considered within the 2017 Central Lancashire Strategic Housing Market Assessment which identified that Preston, Chorley and South Ribble constituted a single HMA as a best-fit to local authority boundaries. The evidence base supporting the identification of the Central Lancs HMA is set out in Section 2 of the SHMA
- 2.3 There has been no change in Planning Practice Guidance regarding how housing market areas are defined between the publication of the SHMA in 2017. The SHMA considered national and regional research on housing market geographies, both of which supported the identification of a Central Lancashire housing market. It considered housing price dynamics, migration and travel to work patterns finding that triangulation of the sources strongly supports placing Chorley, Preston and South Ribble within a common and unique Housing Market Area. Besides house prices, much of the detailed core local data considered in that report remains the most recent available.
- 2.4 Preston’s urban area and the main urban areas in South Ribble (including Penwortham and Bamber Bridge) are in close proximity to one another, and there is clear and strong migration and commuting relationships between the three authorities. Average house price differentials are influenced by the mix of homes sold, which varies by area, and by urban/ rural distinctions. Prices by type across the three areas are relatively similar, as for instance Tables 5.1 and 5.2 herein.
- 2.5 Icenl therefore concludes that the SHMA definition of the Central Lancashire HMA as comprising Preston, Chorley and South Ribble remains appropriate.

National Planning Policy Framework (February 2019)

- 2.6 The latest version of the National Planning Policy Framework was published by Government on 19th February 2019. The Framework (paragraph 7) states that the purpose of planning is to contribute to the achievement of sustainable development. It states (paragraph 9) that planning policies and

³ PPG Reference ID: 61-017-20190315 and ID: 61-018-20190315

decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

- 2.7 Accordingly, plans should apply a presumption in favour of sustainable development. For plan-making this means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change and strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring authorities, where it is sustainable to do so (paragraph 11).
- 2.8 The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. These policies can be contained in joint or individual local plans.
- 2.9 The Framework (paragraph 26) notes that effective and on-going joint working between strategic policy-making authorities is integral to the production of a positively prepared and justified strategy. It sets out that joint working can address a range of issues, including helping to determine where additional infrastructure is necessary; and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 2.10 The Framework (paragraph 27) states that authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. Housing provision is a cross-boundary issue in many areas.
- 2.11 In order to support the Government's objective of significantly boosting the supply of homes, the Framework (paragraph 59) states 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.
- 2.12 The Framework (paragraph 60) sets out that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.
- 2.13 The Framework (paragraph 61) is also clear that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, people who rent their homes and people wishing to commission or build their own homes.

-
- 2.14 Paragraph 73 in the Framework sets out the approach which should be used to calculating the five year housing land supply position. In respect of the housing requirement, it states that: “*Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.*” The Central Lancashire Core Strategy is more than four years old; and the circumstances identified in Footnote 37 whereby the housing requirement figures within it could be used where ‘they have been reviewed and found not to require updating’ are not applicable.
- 2.15 Footnote 37 to Paragraph 73 is also clear that “*where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.*”
- 2.16 The NPPF Glossary (Annex 2) provides an updated definition of affordable housing; as well as definitions of Build to Rent development, local housing need, old people; and self-build and custom housebuilding.

Planning Practice Guidance

Overall Housing Need

- 2.17 The Planning Practice Guidance on Housing Needs Assessments⁴ provides local authorities with a guide on how to approach the standard method for assessing local housing need and provides an overview of the formula. This is dealt with further in the section on overall housing need.
- 2.18 The PPG sets out⁵ that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. It recognises that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area and ultimately, there will be circumstances where it will be appropriate to consider if actual housing need is higher than the standard method indicates and provides some examples of where this may be appropriate. These are however issues for the plan-making process, with the PPG clearly setting out within the *Housing Supply and Delivery* guidance that where housing requirement figures identified in adopted strategic housing policies are more than 5 years old and have not been reviewed and found not to need updating, then the housing requirement figure for five year land supply purposes will be the area’s local housing need calculated using the standard method.⁶ A distinction thus needs to be made in respect of the appropriate housing requirement

⁴ Paragraph: 004 Reference ID: 2a-004-20190220

⁵ Paragraph 010: Reference ID: 2a-010-20190220

⁶ Reference ID: 68-002-20190722, ID: 68-003-20190722 and ID: 68-005-20190722

figure which is relevant for the calculation of five year housing land supply and associated development management in advance of the adoption of a new local plan; and the consideration of the appropriate housing requirement through the local plan process. Consideration of whether it is appropriate to plan for above the standard method local housing need figure is an issue for plan-making only. This is clear from Footnote 37 of the NPPF, which was revised in the February 2019 version.

- 2.19 In instances where local housing need is being calculated for Local Plans which cover more than one area – as is the case in Central Lancashire which has an existing joint Core Strategy and is working to prepare a new joint plan - the PPG⁷ states that the housing need for the defined area should at least be the sum of the local housing need for each local planning authority within the area. It will be for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Councils are required to both develop and maintain Statements of Common Ground by Para 27 in the NPPF which makes reference to these being available through the plan-making process, Such Statements are expected to address the distribution of needs in the area and record agreements that have been reached.⁸ The revised MOU is intended to demonstrate effective and ongoing joint working consistent with Para 27 in the Framework.
- 2.20 The principles of the revised MOU, once it has been consulted upon and endorsed by the three authorities, have also been supported in a recent (Dec 2019) appeal decision regarding Land to the South of Chain House Lane, Whitestake, Preston.⁹ This includes the housing need calculation using the standard method for Central Lancashire and the criteria considered in assessing the proposed distribution, which the Inspector found to not differ significantly from the Core Strategy distribution.

Housing Mix

- 2.21 This Housing Study is also intended to provide an evidence base regarding the need for different types of homes to supplement and address gaps in the evidence set out in the 2017 SHMA. The evidence on needs for different types of homes can help to inform the preparation of a new Local Plan and the consideration of individual planning applications.
- 2.22 The PPG states that authorities will need to consider how the needs of individual groups can be addressed within the overall need established. The need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately. There is

⁷ Paragraph: 013 Reference ID: 2a-013-20190220

⁸ Paragraph: 011 Reference ID: 61-011-20190315

⁹ Appeal Ref: APP/F2360/W/19/3234070

specific PPG on *self-build and custom housebuilding* and PPG on *Build to Rent* which should be taken into account in doing so.

2.23 In June 2019, a new PPG on *housing for older and disabled people* was published which provides guidance for authorities preparing policies on housing for this specific group. This PPG provides an overview of the evidence which can be utilised in assessing older person's needs; the different types of specialist housing available and the requirements for accessible housing – this should also be taken into account in assessing the needs of specific groups.

3. OVERALL HOUSING NEED

3.1 This section considers the overall housing need for Central Lancashire as a whole. The starting point for this is the standard methodology for calculating housing need, which is clearly set out in Planning Practice Guidance.

Housing Need and the Standard Method

3.2 As the authorities have (and are in the process of updating) a Joint Strategic Plan, it is appropriate to consider the needs of Central Lancashire as a whole. As Planning Practice Guidance¹⁰ sets out, the housing need for the defined area should at least be the sum of the local housing need for each local planning authority within the area. It will then be for the authorities to distribute the total housing requirement which is then arrived at across the plan area. Issues of the distribution of the housing need are addressed in Section 4.

3.3 For development management purposes, pending the adoption of a new Local Plan, Paragraph 73 in the NPPF¹¹ is clear that the standard method – as defined in Planning Practice Guidance - should be used to consider the local housing need for the relevant area. In the context of this Study, the relevant area is Central Lancashire.

Step One: Setting the Baseline

3.4 The starting point in considering housing need against the standard method is to establish a demographic baseline of household growth. This baseline is drawn from the 2014-based Household Projections and should be the annual average household growth over a ten year period, with the current year being the first year i.e. 2019 to 2029.

3.5 This results in household growth of 901 dwellings per annum over the ten year period across Central Lancashire, as is shown in the Table below.

Table 3.1 Central Lancashire Household Growth, 2019 to 2029

Central Lancashire	Chorley	Preston	South Ribble	HMA
Households in 2019	50,049	59,133	47,790	156,972
Households in 2029	55,032	61,379	49,569	165,980
Change (2019-2029)	4,983	2,246	1,779	9,008
Annual	498	225	178	901

¹⁰ Paragraph: 004 Reference ID: 2a-004-20190220

¹¹ As well as the PPG, Reference ID: 68-002-20190722, ID: 68-003-20190722 and ID: 68-005-20190722

Step Two: Affordability Adjustment

3.6 The second step of the standard method is to consider the application of an uplift on the demographic baseline, to take account of market signals. The adjustment increases the housing need where the house price to income ratio is above 4. It uses the published median affordability ratios from ONS based on workplace-based median house price to median earnings ratio for the most recent year for which data is available. The latest (workplace-based) affordability data is for 2018-based and was published by ONS in March 2019.

3.7 The Guidance states that for each 1% increase in the ratio of house prices to earnings, where the ratio is above 4, the average household growth should be increased by a quarter of a per cent, with the calculation being as follows:

$$[\text{Affordability Factor} = ((\text{local housing need} - 4)/4) \times 0.25]$$

3.8 Applying this calculation to household growth in the Central Lancashire authorities (as shown in Table 3.2) results in a local housing need figure for 1,026 dwellings per annum, as is shown in the Table below.

Table 3.2 Local Housing Need (2019-2029) – Affordability Adjustment

Central Lancashire	Chorley	Preston	South Ribble	HMA
2014-based Household Growth	498	225	178	901
Median Affordability Ratio, 2018	6.6	5.2	6.5	-
Adjustment	16%	7%	16%	-
Local Housing Need	579	241	206	1,026

Step Three: The Cap

3.9 The third and final step of the standard method is to consider the application of a cap on any increase and ensure that the figure which arises through the first two steps does not exceed a level which can be delivered. There are two situations where a cap is applied:

- The first is where an authority has reviewed their plan (including developing an assessment of housing need) or adopted a plan within the last five years. In this instance the need may be capped at 40% above the requirement figure set out in the plan.
- The second situation is where plans and evidence is more than five years old. In such circumstances a cap may be applied at 40% of the higher of the projected household growth or the housing requirement in the most recent plan, where this exists.

- 3.10 In the case of the Central Lancashire authorities, the second situation is relevant given the most recent Local Plan¹² is more than five years old. The impact of the cap is shown in the Table below for all three authorities.

Table 3.3 Local Housing Need – Capping the Increase

Central Lancashire	Chorley	Preston	South Ribble
Date of Plan Adoption	17.07.2012	05.07.2012	18.07.2012
Plan Housing Requirement	417	507	417
Cap at 40% above Household Growth	698	314	249
Cap at 40% above Housing Requirement	584	710	584
Higher Figure:	698	710	584

- 3.11 In all cases, the cap exceeds the local housing need figure established under step two. As a result, **the minimum local housing need figure across the Central Lancashire HMA is 1,026 dwellings per annum**, as set out in Table 3.2. No cap is applied. **National policy and guidance directs that this figure of 1,026 dpa is the appropriate figure against which to calculate the five year housing land supply.**

Sensitivity Testing

- 3.12 The calculation of local housing need using the standard method is currently based on household growth drawn from the 2014-based Household Projections; consistent with the advice in the PPG.
- 3.13 We consider it is prudent to review the 2014-based demographic evidence which feeds into the current standard method figures and consider the use of the latest demographic evidence, the 2016-based Household Projections. This is particularly relevant for the purposes of considering how much housing to plan for through the preparation of a new joint Local Plan.

2016-based Household Projections

- 3.14 The 2014-based Household Projections do not represent the latest available evidence on household growth. It is therefore prudent to consider more recent household projections. These are the latest official projections, the 2016-based Household Projections, which were published by ONS in September 2018.

¹² The Central Lancashire Core Strategy (July 2012)

- 3.15 In testing the impact of the 2016-based Household Projections in a Central Lancashire context, we have set out to quantify the projected household growth in the first instance in the Table below.

Table 3.4 2016-based Household Growth, 2019 to 2029

	Households, 2019	Households, 2029	Change	Change (%)
Chorley	50,141	55,193	5,052	10.1%
Preston	57,798	58,058	260	0.4%
South Ribble	47,628	49,189	1,561	3.3%
C Lancashire	155,567	162,440	6,873	4.4%
North West	3,134,305	3,272,215	137,910	4.4%
England	23,385,949	25,034,815	1,648,866	7.1%

- 3.16 The Table below sets out a comparison of the 2014-based Household Projections and the 2016-based Household Projections for each authority and the HMA overall.

Table 3.5 Sensitivity Analysis – Household Growth, 2019 to 2029

	Households, 2019	Households, 2029	Change	Change (%)
Chorley				
2014-based	50,049	55,032	4,983	10.0%
2016-based	50,141	55,193	5,052	10.1%
Preston				
2014-based	59,133	61,379	2,246	3.8%
2016-based	57,798	58,058	260	0.4%
South Ribble				
2014-based	47,790	49,569	1,779	3.7%
2016-based	47,628	49,189	1,561	3.3%
Total HMA				
2014-based	156,972	165,980	9,008	5.7%
2016-based	155,567	162,440	6,873	4.4%

- 3.17 The Table shows that across the Central Lancashire HMA, the 2016-based Household Projections anticipate household growth of 6,873 against the 2014-based Household Projections at 9,008 households which is equal to a 24% fall in projected household growth at an HMA level. A reduction in the level of household growth shown is particularly apparent in Preston and South Ribble.

- 3.18 There are two components to the household projections: the population projections; and the assumptions on household formation (headship rates). The household projections are essentially derived from applying household formation (headship) rates by age and sex to the projection

population growth. The Table below sets out further sensitivity analysis with a number of scenarios, this time considering:

- (a) 2014-based Sub National Population Projections with 2016-based headship rates; and
- (b) 2016-based Sub National Population Projections with 2014-based headship rates.

3.19 This is used to interrogate the reasons why projected household growth has fallen from one set of official household projections to the next.

Table 3.6 Sensitivity Analysis – Alternative Scenarios, 2019 to 2029

	2014-based Household Projections	2016-based Household Projections	2014-based SNPP with 2016 Headship Rates	2016-based SNPP with 2014 Headship Rates
Chorley	498	505	490	509
Preston	225	26	137	101
South Ribble	178	156	174	165
HMA	901	687	802	774

3.20 The Table shows that at an HMA level, the 2016-based SNPP represent 59% (i.e. a fall of 127) of the change between the 2014-based and 2016-based Household Projections; whereas household formation rates represent 41% of the change (i.e. a fall of 87).

3.21 The 2016-based Household Projections have however faced criticism following their publication for a number of reasons – particularly around the changes in assumptions and methodology to projecting household formation by ONS. ONS adopt lower assumptions on fertility and international migration than previous projections; and higher assumptions on mortality. Furthermore, the latest household projections use just two data points – from the 2001 Census and 2011 Census – to project household formation to 2021, and then hold household formation constant thereafter.

3.22 This latter issue “bakes in” short-term trends in the ability of households to form and projects them forwards; taking account of a period in which the affordability of housing deteriorated or constrained credit availability and housing market activity. As a result, they build in the suppression of household formation experienced in that time, particularly for younger age groups. The previous 2014-based projections used a longer time-series i.e. all Census points back to 1971; and are therefore subject to a much narrower error margin.

3.23 In October 2018, MHCLG published a technical consultation on updates to national planning policy and guidance – one of the key elements of this consultation was around the standard method and

the use of the 2016-based Household Projections within it. In the technical consultation document, the Government made its views clear in setting out that:

- Household projections are constrained by housing supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live. This means that actual household growth cannot exceed the number of additional homes which are supplied.
- The historic under-delivery of housing means there is a case for public policy supporting delivery in excess of household projections, even if those projections fall.
- The above factors have led to declining affordability, as evidenced by the decrease in the number of people living in an area with an affordability ratio of 4 (i.e. house prices four times that of earnings). Similarly, there has been an increase in those living in areas with an affordability ratio of more than 8 (i.e. house prices eight times that of earnings). This indicates that the Government should not be less ambitious for housing supply.
- Other things being equal, a more responsive supply of homes through local authorities planning for more homes where we need them will help to address the effects of increasing demand, such as declining affordability, relative to a housing supply that is less responsive.

3.24 The Government issued a formal response to the technical consultation in February 2019 which effectively concludes that the 2014-based Household Projections should continue to be used as the demographic starting point. The Government also explicitly set out that it “continues to think that the 2016-based household projections should not be used as a reason to justify lower housing need”. It also updated the PPG setting out explicitly that **“any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework ... it is not considered that these projections provide an appropriate basis for use in the standard method.”**

3.25 The limitations presented by the 2016-based Household Projections are clearly relevant in Central Lancashire. The PPG explicitly states that the latest household projections should not form the demographic starting point and should not be used to move towards a lower housing need figure. In line with the Government’s view, the 2014-based Household Projections should continue to be used as the demographic starting point for calculating housing need. **Iceni conclude on this basis, that the calculation of Central Lancashire’s local housing need at the current time should continue to be based on 2014-based Household Projections.**

The PPG is clear that where strategic policies are being produced jointly, the housing need for the defined area should at least be the sum of the local housing need for each local planning authority; and it is then for the authorities to distribute the need across the plan area.

The analysis in this section has confirmed that **the minimum local housing need figure for Central Lancashire is 1,026 dwellings per annum**. This is the appropriate housing requirement figure at a Central Lancashire level on which to calculate the five year housing land supply based on the evidence and guidance at the time of writing.

Wider Considerations for the Plan-Making Process

- 3.26 Government has made clear through the NPPF that the standard method defines a minimum local housing need. As set out in Section 3, the PPG sets out that there will be circumstances in some areas where it might be appropriate to plan for a higher level of housing need through a local plan than the standard method indicates, including where there are growth strategies in place and/or funding to promote and facilitate additional growth; where strategic infrastructure improvements are expected that are likely to drive an increase in the homes needed locally; or where an authority has agreed to take on unmet need from a neighbouring area, as set out in a Statement of Common Ground.
- 3.27 The PPG also sets out that there may, occasionally, be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard method suggests.

Preston, South Ribble and Lancashire City Deal

- 3.28 The Preston, South Ribble and Lancashire City Deal is an agreement between the Government and four local partners – Lancashire County Council, Lancashire Enterprise Partnership (LEP); Preston City Council and South Ribble Borough Council. The City Deal was signed in 2013 and is intended to ensure the City Deal area continues to grow; by addressing strategic transport infrastructure and development challenges to deliver new jobs and housing.
- 3.29 In signing the deal, the City Deal partners agreed to accelerate the *delivery* of new housing in Preston and South Ribble which was planned for through the Central Lancashire Core Strategy. The City Deal established an Infrastructure Delivery Programme and Investment Fund to deliver the critical infrastructure required to enable the full development of significant housing and commercial development schemes.

3.30 The Infrastructure Delivery Programme, at £334m, is enabling the delivery of four major highway schemes which will support housing delivery including:

- **Preston Western Distributor** (investment: £109.5m) – this will link the A583/A584 to the motorway via a new junction on the M55. This will improve access to the Warton site of the Lancashire Enterprise Zone, the Springfields nuclear fuel facility at Salwick, and enable the comprehensive development of the North West Preston strategic housing location which will accommodate over 4,000 new homes.
- **South Ribble Western Distributor** (investment: £52.5m) – this will double vehicle capacity between Preston City Centre and the motorway network, at the point at which the M65, M6 and M61 connect. This enhancement will enable full development of, and access to, Cuerden strategic employment site and the adjacent Lancashire Business Park. In addition, the road will unlock housing sites to create over 2,700 homes.
- **Broughton Congestion Relief Road** (investment: £23.9m) – this will provide critical relief to the A6, North East Preston and the M6. This new road will unlock housing sites to create over 1,400 new homes.
- **Penwortham Bypass** (investment: £17.5m) – this will significantly improve access between local and motorway networks, reducing congestion in Preston City Centre through by-passing of City Centre routes. In addition, it will enable future housing opportunities to come forward beyond 2024.

3.31 There are a number of other significant developments being brought forward including a range of commercial developments such as the Lancashire Enterprise Zones which are being developed at two locations – BAE Systems’ sites at Samlesbury and Warton. The infrastructure investment will help to unlock a number of housing sites as well as employment sites including the Warton Enterprise Zone and the Springfields nuclear fuel facility, both in Fylde District, as well as enable the delivery of the Cuerden strategic employment site and the adjacent Lancashire Business Park in South Ribble.

3.32 In respect of Enterprise Zones, it is important to acknowledge upfront that the Lancashire Enterprise Zone was effectively established in 2011 in response to job losses announced by BAE systems on their sites in Brough, Warton and Samlesbury – with the zones benefitting from simplified planning rules, super-fast broadband and tax breaks for new businesses on the site. The BAE Samlesbury Enterprise Zone in South Ribble has seen some limited activity in recent years in its development as a national centre of excellence for advanced engineering and manufacturing including most recently a 130,000 sq. ft. assessment management facility. This facility will consolidate a number of BAE’s assessment management sites around the UK and follows the development of an advanced manufacturing research centre at the site.

- 3.33 Combined, the City Deal Infrastructure Delivery Programme and Investment Fund are intended to act as a catalyst for the construction of up to 17,484 new homes over the ten year period from 2014/15 to 2023/24. The City Deal did not however suggest or indicate an acceptance of a higher level of housing need; its focus was bringing forward delivery of the housing numbers and key employment sites identified in the Central Lancashire Core Strategy.
- 3.34 The Table below sets out the delivery performance of Preston and South Ribble against the original City Deal trajectory. Note that the completions figures below do not include demolitions and will vary from those set out earlier in the report.

Table 3.7 City Deal Delivery Performance 2013/14-2018/19

Year	City Deal Area Completions	Original Trajectory	Shortfall
2014/15	974	338	636
2015/16	653	868	-215
2016/17	980	1,391	-411
2017/18	952	1,579	-627
2018/19	1,276	1,891	-615
Total	4,853	6,067	-1,214

- 3.35 As is shown in the Table above, completions figures (avg. 967 dpa) in the City Deal area are over 1,200 homes below the anticipated trajectory agreed through the City Deal.
- 3.36 A review of the City Deal has been undertaken and it is clear that there has been some success in increasing the rate of housebuilding in Preston and South Ribble, through the earlier provision of infrastructure to enable development, provide certainty and increase market confidence. However, the costs of providing the significant infrastructure required have increased and it will be necessary to both extend the City Deal period and/or consider further how infrastructure funding gaps can be addressed. The outcome of the City Deal 'mid term' review should be considered through the new Local Plan in due course.
- 3.37 The City Deal is not part of the Development Plan; rather it assists in supporting investment into the infrastructure delivery programme for Preston, South Ribble and Lancashire. It did not suggest or indicate an acceptance of a higher level of housing need, it's focus was bringing forward delivery of the housing numbers in the Central Lancashire Core Strategy. It is not embodied in policy, is not identified in the NPPF or Guidance as a consideration in assessing five year land supply in advance of the Local Plan adoption, and is currently undergoing a mid-term review which raises some uncertainty over its continuation.

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- 3.38 It is for the plan-making process, as it progresses, in due course to consider/ test alternative housing requirement scenarios; and to assess whether a housing requirement in the new Local Plan should be above/ below the standard method. In bringing together evidence through the plan-making process, the authorities should recognise that they will need to further consider whether high housing provision should be made to support the economy, infrastructure delivery or affordable housing.
- 3.39 The alignment of evidence and strategies for housing and employment is one relevant consideration in doing so. The LEP is, for instance, in the process of preparing a new Local Industrial Strategy, and a Greater Lancashire Plan is also being prepared, and the authorities will take account of further evidence through the plan-making process as it progresses. It will be important that the Councils appraise the alignment of housing and economic evidence through the plan-making process.
- 3.40 Consideration of whether it is appropriate to plan for higher housing figures, or provide additional supply to facilitate delivery above minimum requirement figures (subject to market demand), are however issues for the new Local Plan to consider. They are not considered relevant to the MOU and the assessment of five year housing land supply in advance of the adoption of a new plan.

4. THE DISTRIBUTION OF HOUSING NEED

- 4.1 This section considers various potential approaches to distributing the overall level of housing need in Central Lancashire across the three local authorities; and overlays a number of variables including population, jobs and urban capacity and reviews strategic development constraints to arrive at a recommended distribution.
- 4.2 This section provides a basis for producing and maintaining a Memorandum of Understanding regarding the distribution of development on an interim basis. As the plan-making process progresses, the authorities will need to take account of further evidence and engagement on what level and distribution of housing provision is appropriate for Central Lancashire; as well as engage with adjoining authorities through the Duty to Cooperate.

Alternative Approaches to the Distribution of Housing Need

- 4.3 The Planning Practice Guidance states that local housing need assessments may cover more than one area, in particular where strategic policies are being produced jointly. In such cases, the housing need for the defined area should at least be the sum of the local housing need for each local planning authority within the area¹³; i.e. as we have set out above under Section 3 for Central Lancashire. The Guidance says that it will be for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area.
- 4.4 There are a number of ways to approach the distribution of housing need between the three authorities across the plan area. These are explored in this section.
- 4.5 The current balance of population is distributed as set out in the Table below. This shows that Preston accounts for 38% of the total population in Central Lancashire; whereas, Chorley accounts for 32% and South Ribble accounts for 30%.

Table 4.1 Central Lancashire Distribution of Population (2017 MYPE, 2018)

	2017 Mid-Year Population Estimates	% of Total
Chorley	115,772	32%
Preston	141,346	38%
South Ribble	110,400	30%
Central Lancashire	367,518	100%

¹³ Paragraph: 013 Reference ID: 2a-013-20190220

4.6 It is also helpful to consider the current distribution of workforce i.e. those who are economically active; which we have drawn from the Annual Population Survey from 2018. This is set out in the Table below.

Table 4.2 Central Lancashire Workforce Distribution (Annual Population Survey, 2018)

	Workforce ¹⁴	% of Total
Chorley	63,500	32%
Preston	75,100	38%
South Ribble	58,700	30%
Central Lancashire	197,300	100%

4.7 As the table shows, the distribution of workforce aligns with the distribution of population across Central Lancashire as might be expected.

4.8 Turning to jobs, we have considered the latest available data from the ONS Business Register and Employment Survey (2017). The results of this are set out in the Table below for the Central Lancashire authorities.

4.9 A strategy which sought to more closely balance the distribution of homes and jobs might be influenced by the distribution of workforce or jobs, or more closely align the two. This would ultimately promote a higher level of development in Preston – with 48% of all jobs across Central Lancashire found in Preston. Locating homes close to jobs should help to minimise the need to travel.

Table 4.3 Central Lancashire Jobs Distribution (BRES, 2017)

	Jobs	% of Total
Chorley	39,000	22%
Preston	86,000	48%
South Ribble	54,000	30%
Central Lancashire	179,000	100%

4.10 On the other hand, it might be appropriate for the distribution to take account of and address relative affordability. As the Table shows below, this might promote a higher level of development in Chorley and South Ribble in response to ‘market signals’; with these areas having workplace-based affordability ratios of 6.6 and 6.5 respectively. Equally however, providing homes in the more

¹⁴ Measures as those who were economically active between January 2018 – December 2018

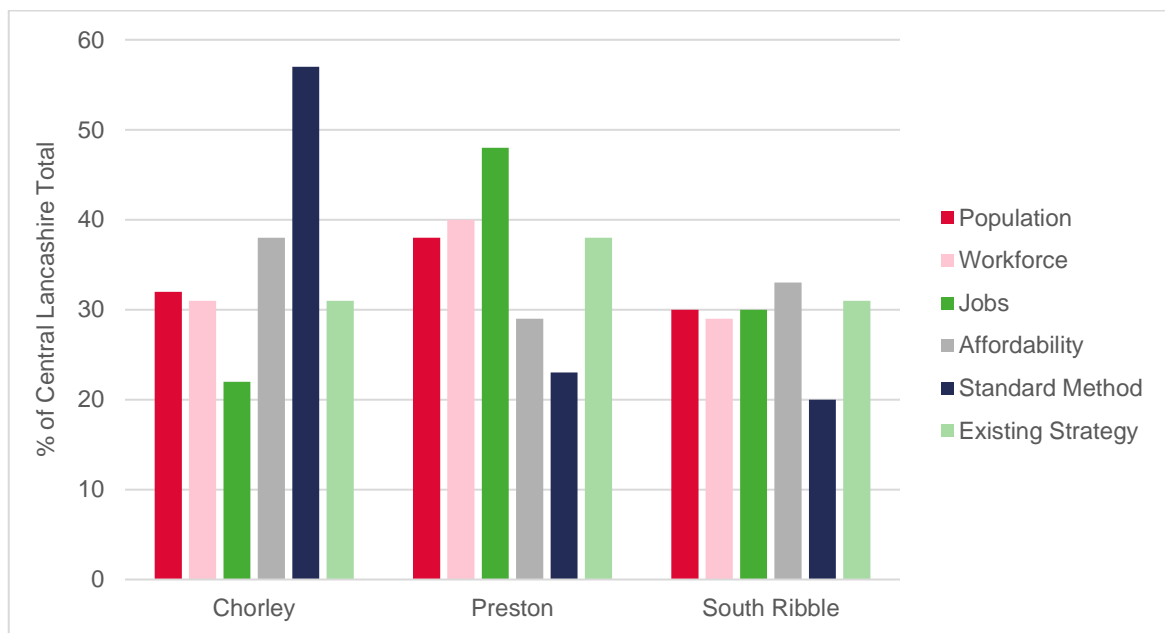
affordable authority of Preston might make new housing more accessible to people on lower incomes.

Table 4.4 Central Lancashire Affordability (Workplace-Based, ONS 2018)

	Affordability Ratio	% of Total
Chorley	6.6	36%
Preston	5.16	28%
South Ribble	6.51	36%
Central Lancashire	18.27	100%

4.11 The Figure below brings all of these together and portrays the alternative approaches which could be taken forward alongside the distribution brought about through the standard method and the current distribution in the 2012 Central Lancashire Core Strategy.

Figure 4.1 Alternative Approaches to the Distribution of Need



4.12 The above Table and analysis demonstrates that there are various ways in which we can look at the distribution of housing need. It demonstrates that if we look at the distribution of population, workforce and jobs in isolation; it would support Preston receiving higher levels of growth than both Chorley and South Ribble.

4.13 However, consideration of the standard method figures on an authority-by-authority basis, the Figure clearly shows that this focuses 57% of the HMA’s total housing provision in Chorley; with only 23% in Preston and 20% in South Ribble. This is significantly at odds to the distribution of people, jobs and services. Clearly, there is a need to understand the reasons for the standard method’s distribution of housing need and we seek to provide further context on this below.

- 4.14 Icen's analysis indicates that the standard method distribution of need between the three authorities in Central Lancashire is particularly influenced by the level of development in different areas between 2009-14, the core period for which the 2014-based Population Projections were derived. Over this period, 60% of the HMA's completions were in Chorley and just 16% in Preston; and this has fed through to the demographic baseline in the standard method figures. There is no clear reason as to why this distribution of development should necessarily be maintained moving forwards.

Table 4.5 Distribution of Housing Completions, 2009/10-2013/14

	Chorley	Preston	South Ribble	Central Lancs
Completions 2009-14	2,739	741	1,076	4,556
% Completions	60%	16%	24%	100%

Source: Chorley, Preston and South Ribble Monitoring Reports

- 4.15 The table below by comparison provides a longer-term assessment of the distribution of housing development between the three authorities. This shows a very different distribution with 39% to Chorley, 33% to Preston and 27% to South Ribble. The last reporting year shows a balance of 28.5% in Chorley, 44% in Preston and 27.5% in South Ribble.

Table 4.6 HMA Housing Completions Data, 2003/04 to 2018/19

Monitoring Period	Chorley	Preston	South Ribble
2018/19	508	785	491
2017/18	661	634	318
2016/17	517	791	189
2015/16	597	282	371
2014/15	723	488	486
2013/14	582	142	346
2012/13	638	202	168
2011/12	552	265	170
2010/11	527	127	221
2009/10	440	5	171
2008/09	355	468	312
2007/08	288	609	320
2006/07	121	565	284
2005/06	489	627	520
2004/05	479	544	657
2003/04	585	308	538
Total	8,062	6,842	5,562
% of HMA Total	39%	33%	27%

Source: Chorley, Preston and South Ribble Monitoring Data

- 4.16 We have also considered housing completions over the five year period from 2014/15 to 2018/19 – the most recent period for which data is available. The analysis shown in the Table below demonstrates that there has been a notable shift in the balance of completions between Chorley and Preston (with completions in Preston increasing by 302% over the more recent five year period); whilst completions in South Ribble have increased in absolute terms. Over this period 39% of completions were in Chorley, 38% in Preston and 23% in South Ribble. The analysis clearly shows how the base period can affect the distribution of development significantly.
- 4.17 The distribution of growth in the more recent period is inherently linked to the City Deal which is expected to have a greater impact in South Ribble over the coming years and continue to influence Preston and South Ribble for a number of years to come. Readdressing the distribution across the three authorities to be more reflective of the City Deal aspirations is an important consideration which feeds into our recommendation in this section.

Table 4.7 Distribution of Housing Completions, 2014/15-2018/19

	Chorley	Preston	South Ribble	Central Lancs
Completions 2014-19	3,071	2,980	1,855	7,906
% Completions	39%	38%	23%	100%

Existing Spatial Strategy

- 4.18 The distribution of housing provision will invariably be influenced by the emerging Central Lancashire Local Plan Review’s strategic objectives and spatial strategy which will need to balance a range of planning considerations. As a result, it is a useful starting point to consider the existing spatial strategy and focus for housing growth across the three local authorities which we have drawn out in Figure 4.1 above; and which places a greater focus of growth at Preston.
- 4.19 The Central Lancashire Core Strategy (July 2012) acknowledges Preston’s emergence as ‘a new economic force’ which had survived the decline in manufacturing employment that had affected other parts of Lancashire and the North West. The Core Strategy recognises the City Centre of Preston as the largest concentration of commercial activity in Central Lancashire; and notes the University of Central Lancashire in Preston as a significant driver for economic growth.
- 4.20 However, the rationale for growth in Central Lancashire and the focus on Preston was also influenced by the North West Regional Spatial Strategy¹⁵ (“RSS”). The RSS identified the City of Preston as the main foci of the sub-region. The RSS fundamentally aimed to support the vision to development Central Lancashire as an area where economic growth is focussed at Preston. This economic growth

¹⁵ North West of England Plan Regional Spatial Strategy to 2021 (September 2008)

would be supported by high quality investment sites in sustainable locations that meet the requirements of business and industry.

4.21 The RSS identified the Greater Preston “core area” of the City Region based on the administrative areas of Chorley, Preston and South Ribble, as an area which provides a significant economic focus for the sub-region. It set out under Policy CLCR2 that development would be located primarily in the City of Preston; noting the following strengths and opportunities for Preston:

- focal point at the intersection of north-south and east-west transport corridors;
- established advanced engineering and aerospace industries;
- centre of public administration, justice and financial services;
- University of Central Lancashire, with links to knowledge-based business;
- regional public transport gateway and interchange;
- retail and service centre.

4.22 Derived from the RSS and set out in the Central Lancashire Core Strategy, the Table below sets out the housing requirement across the Central Lancashire HMA across the current plan period from 2010 to 2026 of 1,341 dwellings per annum equating to around 21,500 homes in total over the plan period.

Table 4.8 Core Strategy Housing Requirements, Central Lancashire

	Requirement (p.a.)	% of Total
Chorley	417	31%
Preston	507	38%
South Ribble	417	31%
HMA Total	1,341	100%

4.23 The Core Strategy sets out a total provision for Central Lancashire of 22,158 new homes over the 16-year plan period; including prior under provision of 702 homes. A breakdown of the broad distribution of housing development in Central Lancashire with references to strategic sites and locations is set out below. The Plan notes that this is a predicted distribution based on the potential for development rather than the proportions that are required to be met.

Table 4.9 Core Strategy Predicted Proportions of Housing Development (2010-2026)

Location	Total	% of Total
Preston and South Ribble Urban Area including Cottam, Central Preston, North West Preston, South of Penwortham and Elsewhere	10,600	48%
Buckshaw Village Strategic Site	2,300	10%
Key Service Centres	5,500	25%
Urban Local Service Centres	2,100	9%
Rural Local Service Centres and Elsewhere	1,700	8%
Total	22,200	100%

4.24 As is shown, the Core Strategy predicted that 48% of the total supply would be developed at strategic sites and location within the urban area of Preston and South Ribble – driven principally by the large strategic sites in North West Preston, Central Preston, Cottam and South of Penwortham.

4.25 The existing spatial strategy, coupled with the existing distribution of population, workforce and jobs as portrayed in Figure 4.1 provides us with an alternative perspective given that the standard method figure points to a distribution very much centred on reinforcing higher levels of growth at Chorley.

Distribution of Affordable Housing Need

4.26 The need for affordable housing is considered in Section 5 of this report, following the approach set out in the PPG. It identifies the following distribution of affordable housing need between the three authorities:

Table 4.10 Distribution of Affordable Housing Need in Central Lancashire

	Chorley	Preston	South Ribble	Total
Affordable Housing Need	132	250	208	590
	22%	42%	35%	100%

4.27 The evidence points to the greatest affordable housing need being in Preston (42%) with the lowest proportion in Chorley (22%). This is also a relevant consideration in appraising the housing distribution.

Strategic Development Constraints & Considerations

4.28 The Framework (paragraph 103) is clear that the planning system should actively manage patterns of growth in support of promoting sustainable transport objectives; focussing development on locations which are or can be made sustainable. In the context of potentially reviewing Green Belt boundaries, the Framework (paragraph 138) is also clear that if boundaries are to be reviewed, there

is a need to promote and take account of sustainable patterns of development and that other options for development of land which isn't Green Belt have been fully explored.

4.29 The PPG is also clear that in assessing the suitability, availability and achievability of sites, local authorities should consider constraints including those set out in the Framework under footnote 6 including the Green Belt, AONB or other protected areas such as Sites of Specific Scientific Interest and Local Green Space.

4.30 Icenl has therefore reviewed strategic development constraints across Central Lancashire. Upfront, it should be noted that the Central Lancashire HMA authorities have varying levels of strategic constraints. The Government's record of the proportion of land area covered by constraints for each authority area is set out in the Table below. This analysis is drawn from the MHCLG's consultation on the standard method for calculating housing need in 2017.

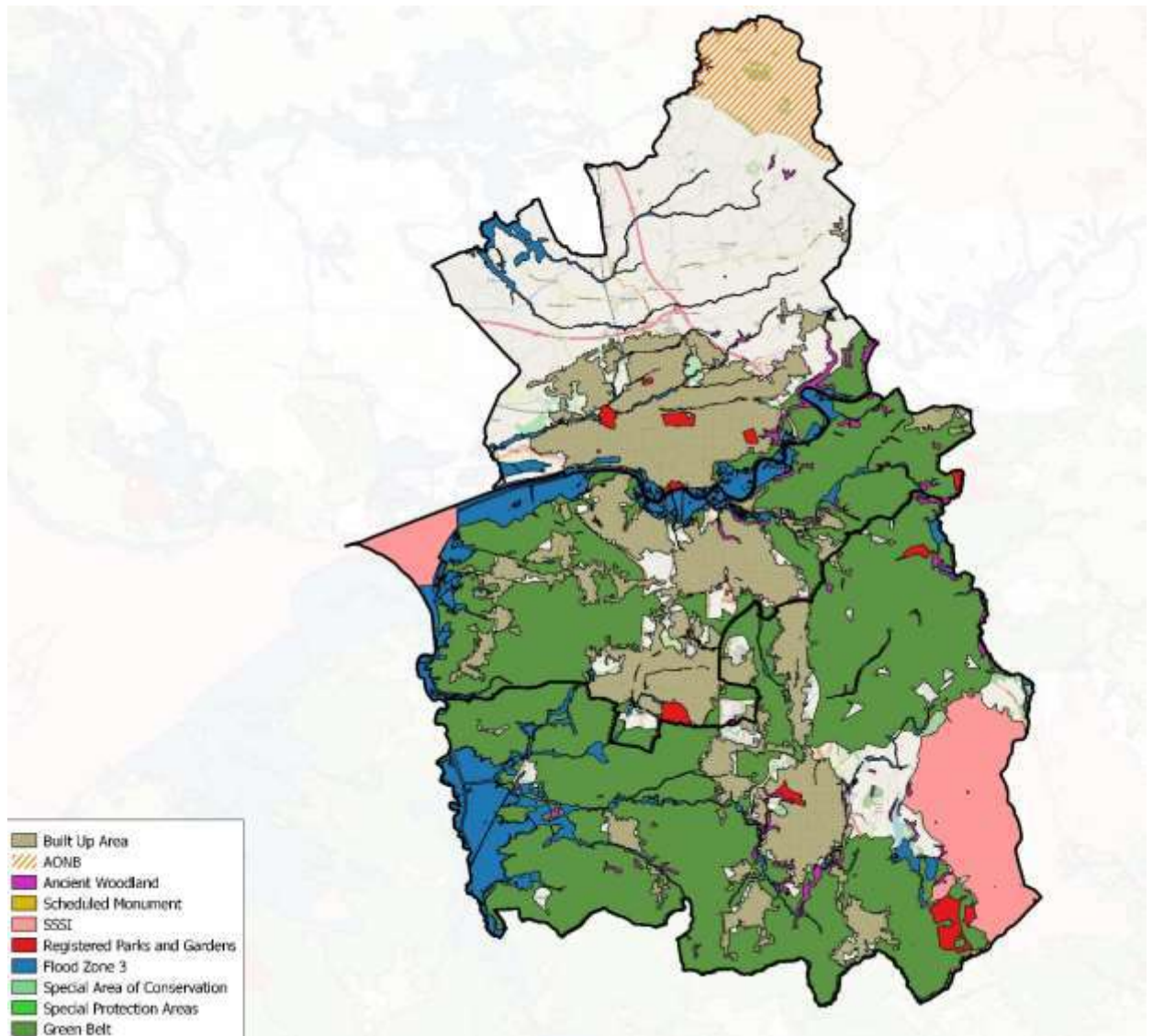
Table 4.11 Proportion of Land Covered by Significant Constraints

Area	Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest
Chorley	80%
Preston	14%
South Ribble	69%

Source: MHCLG's Planning for the Right Homes in the Right Places: Housing Need Consultation Data Table (2017)/ Council data

4.31 In order to visualise this, we have produced a map which looks at the three authority areas and sets out the key, nationally significant constraints identified in the Framework under footnote 9. This is shown in the Figure below.

Figure 4.2 Central Lancashire – Nationally Significant Constraints



4.32 Evidently, Chorley and South Ribble are Boroughs which are heavily constrained by nationally significant constraints including Flood Zone 3, Sites of Special Scientific Interest, Registered Parks and Gardens which the Framework seeks to protect. The Boroughs are also heavily constrained by Green Belt, which the Framework (paragraph 133) says should only be amended in exceptional circumstances through the plan-making process.

4.33 The extent to which each authority area is constrained is an important influence on the appropriate distribution of housing need.

Urban Housing Capacity

4.34 The local authorities existing housing land supply position is also a component in considering the appropriate distribution of housing; and it is necessary to overlay this information on top of the considerations set out above.

-
- 4.35 The Framework (paragraph 67) states that local authorities need to have a clear understanding of the land availability within their area and identify a sufficient supply and mix of sites for inclusion within their strategic housing land availability assessment. Drawing from this, authorities through policy in their Local Plan, should then identify a supply of specific, deliverable sites for years one to five of the plan period; and specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan.
- 4.36 In the context of potentially reviewing Green Belt boundaries in areas which are constrained by Green Belt such as Chorley and South Ribble, the Framework (paragraph 138) is clear that authorities should be able to demonstrate that it has examined fully all other reasonable options for meeting identified need before concluding boundaries should be reviewed.
- 4.37 Our starting point has therefore been to establish the total potential capacity for housing taking account of existing commitments, allocations, brownfield sites and underutilised land identified in the Councils' land supply.
- 4.38 The local planning authorities have supplied us with housing land supply information which is set out in the following:
- Central Lancashire Strategic Housing and Employment Land Availability Assessment (July 2019)
 - Chorley Housing Land Monitoring Report (April 2019)
 - Preston City Council Housing Land Position Statement (April 2019)
 - South Ribble Housing Land Monitoring Report (July 2019)
- 4.39 The key document is the Central Lancashire Strategic Housing and Economic Land Availability Assessment ("SHELAA") which is an assessment which seeks to identify a future supply of housing and employment land which is suitable, available and achievable over the plan period in Central Lancashire.
- 4.40 As is clear from the PPG¹⁶, the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment – the SHELAA - to determine on the basis of available information whether or not sites are available to meet the Central Lancashire authorities

¹⁶ PPG on Housing and Economic Land Availability Assessment, Paragraph: 001 Reference ID: 3-001-20190722

requirements. The assessment is not expected to determine which of these sites are most suitable to meet those requirements however; as this is the role of the Local Plan.

4.41 As part of the Councils' Call for Sites exercise, an indicative site capacity was requested from each submission which would then be subject to corrections upon further analysis. The SHELAA's methodology used to assess each site is set out in detail within the "CLLP Strategic Housing and Economic Land Availability Methodology Statement, Iteration 1 - April 2019" document. This document also provides an overview of the broad assumptions used to arrive at a nominal capacity figures for each site. However, it should be noted that the SHELAA methodology for calculating the net developable area and the density is yet to be finalised and as a result, the interim methodology recognises that any initial calculations may be reviewed in subsequent iterations.

4.42 The broad assumptions used to calculate capacity are as follows:

- Assumed net ratio (i.e. the initial net developable area) to be applied to housing sites of different sizes; set out as follows:
 - Site of less than 0.4 ha: 90% of site developed for housing
 - Site of 0.4 ha to 4.9 ha: 80% of site developed for housing
 - Site of 5 ha to 10 ha: 60% of site developed for housing
 - Site over 10 ha: 50% of site developed for housing
- Density assumption applied used a standard density multiplier of 35 dph for all housing sites. It is recognised that a 35 dph will not always be appropriate for every site (i.e. Preston City Centre will be higher; or isolated rural sites may be lower). This assumption does however provide a steer on the nominal capacity for housing. At Section 6 of this report, additional guidance is provided on establishing appropriate density assumptions.

4.43 By drawing together the supply information provided by the local authorities and through applying the broad assumptions (including in respect of net developable area and density), there is a nominal capacity for 77,459 homes across Central Lancashire as a result of submissions to the SHELAA process.

4.44 The Table below sets this out; however, it should be stressed that this figure has not been subject to detailed constraints testing and the figures set out are not an indication of deliverable or developable supply. For instance, some of the sites included within the Table below are situated within the Green Belt or Flood Zone 3. There is also the possibility that there is an element of double counting in the sites submitted to the SHELAA process which have yet to be filtered out.

Table 4.12 Central Lancashire Total Nominal Housing Capacity

Housing Land Supply	CBC	PCC	SRBC	HMA
All SHELAA Housing Submissions	21,818	27,335	28,306	77,459
% HMA Total	28%	35%	37%	100%

4.45 The total nominal capacity for housing across the Chorley, Preston and South Ribble would be split on a percentage basis of 28%, 35% and 37% respectively. However, in line with the Framework (paragraph 137) this should not be viewed as the confirmed starting position. The starting point for establishing the housing capacity of the Central Lancashire authorities in the context of demonstrating exceptional circumstances around Green Belt release is suitable brownfield sites and underutilised land.

4.46 For the purpose of arriving at a broad urban capacity figure for the three Central Lancashire authorities, Icenl has removed all sites which either fall wholly within the Green Belt or fall wholly on greenfield sites. The nominal capacity on this basis is reduced to 29,549 dwellings. The Table below provides a breakdown of this land supply taking account of these broad assumptions. This is on the basis of the current evidence and the SHELAA process, and it should be recognised that there will be opportunities for sites to be reconsidered subject to further testing and analysis as the plan-making process progresses.

Table 4.13 Calculating the Urban Capacity for Central Lancashire

Housing Land Supply	CBC	PCC	SRBC	HMA
All SHELAA Housing Submissions	21,818	27,335	28,306	77,459
Wholly within Green Belt	-15,534	-22	-16,412	-31,968
Wholly within the Countryside	-1,030	-14,896	-16	-15,942
Nominal Urban Capacity (max.)	5,254	12,417	11,878	29,549
% of Urban Capacity	18%	42%	40%	100%

4.47 As the analysis shows, the higher proportion of constraints in Chorley are reflective of the available urban capacity in the Borough representing 18% of all 'available' land. It is anticipated that Preston and South Ribble would therefore be able to accommodate a higher proportion of the plan area's need without the need to release Green Belt or greenfield land.

The Recommended Approach to the Distribution of Need

4.48 It is apparent that there are a number of ways to approach the distribution of housing need including drawing on the existing distribution of housing with reference to housing land supply, population, workforce and jobs; and acknowledging the extent of nationally significant constraints across the HMA, and the Framework's direction on directing growth towards the most sustainable locations.

4.49 Our approach seeks to overlay these variables in order to arrive at an interim distribution which is supported by clear logic which will in turn support sustainable patterns of development; drawing on components which include:

- Optimising urban capacity through making as much use as possible of suitable brownfield sites and underutilised land as well as optimising densities (considered further in Section 6);
- Seeking to locate homes close to jobs in order to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support economic growth, innovation and improved productivity;
- Readdressing the distribution of housing to be more reflective of the Preston and South Ribble City Deal aspirations;
- Supporting delivery of affordable housing in accordance with the distribution of affordable housing needs shown; and
- Responding to the proportion of land take currently subject to nationally significant constraints referenced in the Framework in each authority area.

4.50 The conclusions on the recommended distribution of housing within Central Lancashire for the purposes of the MOU have taken account of the distribution of jobs, population, and workforce and the relative affordability of the three areas are considered to support, in particular, sustainable patterns of development at the scale at which the issue is being considered. Nominal urban capacity and land subject to national constraints have also informed the distribution recommended.

4.51 Past delivery levels have been influenced by land availability and infrastructure constraints which have affected the level and pace/phasing of development in different areas, with for instance delivery of Buckshaw Village in particular leading to significant development in Chorley. This is clear in comparing the distribution of development over the 2009-14 period which fed into the standard method and differs from the more recent distribution of development (Table 4.7). There is no clear planning reason as to why the appropriate distribution moving forwards should necessarily closely mirror development trends between 2009-14.

4.52 Drawing the analysis in this section together, the Table below sets out the various variables which have influenced our recommendation on the distribution of housing need. Iceni considers that 27.5% of the local housing need should be distributed to Chorley, 40% to Preston and 32.5% to South Ribble through a revised Memorandum of Understanding based on the evidence herein. It is however for the respective authorities to formally agree between them the appropriate distribution.

- 4.53 Icení recommends that the highest proportion is distributed to Preston recognising that this is the higher order centre within the sub-region with the greatest range of services and employment opportunities, with investment and funding being utilised as a result of the City Deal. It is also subject to the lowest proportion of nationally-significant development constraints.
- 4.54 Chorley sees the lowest proportion at 27.5% reflecting that it has a lower level of employment opportunities than other areas, more limited urban capacity, and a significant level of nationally-significant development constraints, in particular Green Belt.
- 4.55 South Ribble sees a distribution which is slightly above the current proportion of employment, but sits between this and the current population base and slightly above that in Chorley reflecting the lower proportion of land subject to nationally-significant constraints and higher level of urban capacity. The Borough is also being supported by investment and funding as a result of the City Deal. Preston and South Ribble also have a greater affordable housing need (see Section 5 analysis).

Table 4.14 Recommended Distribution for Central Lancashire

Variable	CBC	PCC	SRBC
Jobs Distribution	22%	48%	30%
Population Distribution	32%	38%	30%
Affordability Distribution	36%	28%	36%
Affordable Housing Need Distribution	22%	42%	35%
Workforce Distribution	32%	38%	30%
Nominal Urban Capacity	18%	42%	40%
Existing Spatial Strategy	30%	40%	30%
Land not Subject to National Constraints	20%	86%	33%
Recommended Distribution (%)	27.5%	40%	32.5%

Conclusions on Distribution of Housing Need

4.56 The implications of applying the recommended distribution to the total local housing need for Central Lancashire is set out in the Table below alongside the initial distribution as calculated through the application of the standard method.

Table 4.15 Distribution of Housing Need

	CBC	PCC	SRBC	Total
Local Housing Need (Standard Method)	579	241	206	1,026
% of Local Housing Need (Standard Method)	57%	23%	20%	100%
Recommended Distribution (%)	27.5%	40%	32.5%	100%
Local Housing Need (Iceni Analysis)	282	410	334	1,026

4.57 In summary, Iceni's recommended distribution results in a local housing need of 1,026 dwellings per annum distributed across the plan area as follows:

- **282 dwellings per annum in Chorley,**
- **410 dwellings per annum in Preston; and**
- **334 dwellings per annum in South Ribble.**

4.58 It is anticipated that an updated Memorandum of Understanding will be progressed and signed between the three authorities which draws on the conclusions set out on the distribution of identified development needs in line with the PPG.

4.59 The proposed distribution set out herein is considered to take account of a range of factors including population, workforce and jobs distribution and strategic constraints including Green Belt.

5. AFFORDABLE HOUSING NEED

- 5.1 The next few chapters in the report move on to consider the need for different types of homes. This section provides an analysis of the need for affordable housing across the three Central Lancashire authorities. It addresses the revised definition of affordable housing set out in the Framework (February 2019).

Defining Affordable Housing

- 5.2 Affordable housing is defined by Government in the NPPF as “*housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route into home ownership and/or is for essential local workers).*” The NPPF then defines various forms of affordable housing including affordable housing to rent, starter homes, discounted market sale housing and other affordable routes into home ownership, including shared ownership housing.
- 5.3 Through the preparation of the NPPF and publication of associated Planning Practice Guidance, the Government has widened the definition of those considered to be in affordable housing need. It has traditionally encompassed households who require support or assistance to meet their basic housing needs. The expanded definition however now includes ‘*households which can afford to rent in the private rental market, but cannot afford to buy despite a preference for owning their own home*’ and for whom affordable housing products are an important stepping stone into home ownership.
- 5.4 There is limited guidance from Government on how to assess need against this expanded definition. The methodology used in this report therefore draws on the methodology (as set out in the PPG); and then seeks to estimate the number of households who can afford to rent privately without financial support but seek home ownership but require support to do so and the supply of affordable home ownership properties available for this group.
- 5.5 Our assessment looks at need in the 18-year period from 2018 to 2036, to be consistent with other analysis developed in the report.

Entry-Level Affordability

- 5.6 An important part of the affordable needs modelling is to establish the entry-level costs of housing to buy and rent. The affordable housing needs assessment compares prices and rents with the incomes of households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an ‘affordable housing need’. The information about local housing costs is also relevant for analysis of the different tenures of affordable housing needed.

5.7 The entry-level costs of housing to both buy and rent have been assessed using Land Registry and Valuation Office Agency (VOA) data to establish lower quartile prices and rents.

5.8 Data from the Land Registry for the year to March 2019 shows estimated lower quartile property prices by dwelling type. Entry-level prices are lower in Preston than other areas, with South Ribble typically showing the highest prices.

Table 5.1 Lower Quartile Cost of Housing to Buy – year to March 2019

	Chorley	Preston	South Ribble
Flat/maisonette	£76,000	£48,000	£80,000
Terraced	£84,000	£75,000	£95,000
Semi-detached	£127,000	£121,000	£130,000
Detached	£220,000	£213,000	£199,000
All dwellings	£116,000	£95,000	£125,000

Source: Land Registry

5.9 It is arguably more useful to consider the lower quartile prices by size of accommodation (number of bedrooms) and the table below shows an estimate of this. The information has been drawn from internet sources (such as Rightmove) and then constrained to be consistent with the figures shown from the Land Registry source.

Table 5.2 Lower Quartile to buy by size, year to March 2019

	Chorley	Preston	South Ribble
1-bedroom	£63,000	£56,000	£67,000
2-bedrooms	£95,000	£78,000	£95,000
3-bedrooms	£135,000	£108,000	£138,000
4-bedrooms	£225,000	£220,000	£228,000
All properties	£116,000	£95,000	£125,000

Source: Land Registry and internet price search

5.10 A similar analysis has been carried out for private rents using Valuation Office Agency (VOA) data – this again covers a 12-month period to March 2019. The analysis shows an average lower quartile cost (across all dwelling sizes) of between £450 (Preston) and £500 per month (South Ribble). In general, the differences in rental costs are not as notable as for housing to buy.

Table 5.3 Lower Quartile Market Rents, year to March 2019

	Chorley	Preston	South Ribble
Room only	£347	£320	£450
Studio	-	£320	£330
1-bedroom	£388	£395	£395
2-bedrooms	£475	£475	£500
3-bedrooms	£550	£525	£583
4-bedrooms	£800	£668	£750
All properties	£475	£450	£500

Source: Valuation Office Agency

Local Income Levels

- 5.11 It is important to understand local income levels as these (along with the price/rent data) will influence the ability of a household to afford to buy or rent housing in the market without the need for some sort of subsidy. Data about total household income has been based on ONS modelled income estimates, with data from the English Housing Survey (EHS) being used to provide information about the distribution of incomes for different types of household.
- 5.12 We have used these data sources to construct an income distribution for the three local authorities for 2018. The table below shows average (mean) incomes and also the median and lower quartile estimates for each area. The analysis shows higher household incomes in Chorley and South Ribble, with lower figures in Preston.

Table 5.4 Estimated average household income by local authority and sub-area (mid-2018 estimate)

	Mean	Median	Lower quartile
Chorley	£43,100	£32,800	£19,000
Preston	£37,800	£28,700	£16,600
South Ribble	£42,800	£32,600	£18,800

Source: Derived from EHS and ONS data

Affordability

- 5.13 A household is considered able to afford market rented housing in cases where the rent payable would constitute no more than a particular percentage of gross income. The choice of an appropriate threshold is an important aspect of the analysis. CLG 2007 SHMA Practice Guidance suggested that 25% of income is a reasonable start point but also noted that a different figure could be used. Analysis of current letting practice suggests that letting agents typically work on a multiple of 40%. Government policy (through Housing Benefit payment thresholds) would also suggest a figure of 40%+ (depending on household characteristics).
- 5.14 The threshold of income to be spent on housing should be set by asking the question 'what level of income is expected to be required for a household to be able to access market housing without the need for a subsidy (e.g. through Housing Benefit)?' The choice of an appropriate threshold is

judgement based and we consider should be assessed having regard in particular to the cost of housing rather than income. Income levels are only relevant in determining the number (or proportion) of households who fail to meet the threshold.

- 5.15 At £450-£500 per calendar month, lower quartile rent levels in Central Lancashire are relatively low in comparison to those seen nationally (a lower quartile rent of £525 per month across England). This would suggest that a proportion of income to be spent on housing would be towards the lower end of the range.
- 5.16 Across England, the lowest lower quartile rents are around £400 per month, and if these areas are considered to be at the bottom end of the range (i.e. 25% of income to be spent on housing) then this would leave a residual income of £1,200 per month. With the same residual income applied to rents in Central Lancashire the percentage spent on housing would be in the range of 27-29%.
- 5.17 However, it needs to be considered that the cost of living may be slightly higher than in the cheapest parts of England and so a pragmatic approach to determining a reasonable proportion of income has been to take a midpoint between the bottom (25%) and the equivalent residual income figure (27-29%). It has therefore been estimated that a threshold of around 26-27% would be appropriate – for modelling purposes a figure of 26% has been used in Preston and 27% in the other two local authorities.
- 5.18 Generally, the income required to access owner-occupied housing is higher than that required to rent (albeit marginally in the case of Preston) and so the initial analysis is based solely on the ability to afford to access private rented housing. However, the local house prices are important when looking at the extended definition of affordable housing in NPPF and are returned to when looking at this new definition.

Need for Rented Affordable Housing

- 5.19 The method for studying the need for affordable housing has been enshrined in Strategic Housing Market Assessment (SHMA) guidance for many years, with an established approach to look at the number of households who are unable to afford market housing (to either rent or buy). The analysis below follows the methodology and key data sources in guidance and can be summarised as follows:
- Current need (an estimate of the number of households who have a need now and based on a range of data modelled from local information);
 - Projected newly forming households in need (based on projections developed for this project along with an affordability test to estimate numbers unable to afford the market);
 - Existing households falling into need (based on studying the types of households who have needed to access social/affordable rented housing and based on study past lettings data);

- These three bullet points added together provide an indication of the gross need (the current need is divided by 18 so as to meet the need over the 2018-36 period);
- Supply of affordable housing (an estimate of the likely number of lettings that will become available from the existing social housing stock – drawing on data from CoRe¹⁷); and
- Subtracting the supply from the gross need provides an estimate of the overall (annual) need for affordable housing.

Table 5.5 Summary of analytical stages in assessing affordable housing need

Analytical stage	Description	Method
1 – Current need	An estimate of the number of households who have an affordable need now	Based on the categories of need set out in 2a-020 of the PPG and based on a range of data sources. For some analysis (e.g. overcrowding) Census data is used to provide a baseline which is then updated with reference to national changes informed by the English Housing survey (EHS). An affordability test is applied based on income and housing costs data.
2 – Newly forming households	An annual estimate of the number of new households forming with a need for affordable housing	The number of new households forming is based on outputs from the demographic projections, looking at younger households (aged under 45) forming for the first time. An affordability test is applied, again based on income and housing costs data. Analysis based on 2a-021 of the PPG.
3 – Existing households falling into need	An annual estimate of the number of existing households who will have a need in the future	Based on analysis of data on social housing lettings where accommodation has been provided to a household previously living in their own accommodation (whether rented or owned). No methodology for this stage is provided in the PPG and so the method used links to older SHMA guidance
4 – Supply of affordable housing	Annual estimate of the supply of relets from the existing stock	Based on trend data for the past 3-years, the estimate looks at the number of lettings before netting off the number of lettings in new homes and the number of transfers. This is to ensure that the number reflects the supply available from the existing stock. Based on 2a-022 of the PPG.

5.20 The table below shows the overall calculation of affordable housing need. This excludes supply arising from sites with planning consent (the ‘development pipeline’). The analysis shows that there is a need for 590 dwellings per annum to be provided in the HMA with all areas seeing a similar level

¹⁷ The continuous recording of lettings and sales in social housing in England (referred to as CoRe) is a national information source that records information on the characteristics of both private registered providers and local authority new social housing tenants and the homes they rent

of need, ranging from 132 in Chorley to 250 in Preston. Gross need is estimated to be highest in Preston, however this area also has the highest projected supply from the existing stock of housing.

Net Need = Current Need + Need from Newly-Forming Households + Existing Households falling into Need – Supply of Affordable Housing

Table 5.6 Estimated Need for Rented Affordable Housing (per annum) – 2018-36

	Chorley	Preston	South Ribble	Central Lancashire
Current need	30	76	35	141
Newly forming households	308	493	320	1,121
Existing households falling into need	163	311	128	602
Total Gross Need	501	881	482	1,864
Re-let Supply	369	631	273	1,273
Net Need	132	250	208	590

Source: Census (2011)/CoRe/Projection Modelling and affordability analysis

Comparison with 2017 Assessment

- 5.21 The Table below compares the assessment of affordable housing need herein to that in the September 2017 report by GL Hearn. The analysis shows a slightly lower level of need in this assessment, albeit this is not considered to be substantially different when it is noted that the net need is calculated by subtracting one relatively large number (supply) from another (gross need).
- 5.22 For the individual local authorities, the analysis in this report shows a slightly higher level of need in Chorley, but lower in the other two authorities. Regardless, both studies clearly demonstrate a substantial need for additional affordable housing and the Councils should seek to maximise delivery where opportunities arise.

Table 5.7 Comparison of Affordable Housing Need Assessments

	This study	2017 SHMA
Current need	141	119
Newly forming households	1,121	1,232
Existing households falling into need	602	893
Total Gross Need	1,864	2,243
Re-let Supply	1,273	1,623
Net Need	590	620

Source: 2017 SHMA data from Table 59

What Types of Affordable (Rented) Housing?

- 5.23 The analysis above has studied the overall need for rented affordable housing with a focus on households who cannot afford to rent in the market. These households will therefore have a need

for some form of rented housing at a cost below typical market rates. Typically, there are two types of rented affordable accommodation (social and affordable rented) with the analysis below considering what a reasonable split might be between these two tenures.

- 5.24 Initially, in terms of social and affordable rents, an analysis has been undertaken to compare the income distribution of households with the cost of different products. For affordable rented housing it has been assumed that this would be available at a cost which is 80% of the established lower quartile costs set out earlier in this section. Any household able to afford a rent between 80% of the market and the market is assumed able to afford an affordable rent, with other households only able to afford a social rent.
- 5.25 The analysis identifies that between 29% and 33% of the group of households unable to afford market housing to rent fall in the gap between the market and 80% of the market depending on location. It is therefore suggested that a target of 30% of all rented affordable housing is affordable rents would be reasonable and therefore it appropriate that 70% of rented affordable housing is social rents.
- 5.26 The Table also shows the rent levels assumed (for a 2-bedroom home); it is quite possible that, for example, 80% of market rent would be higher than the figures modelled below and if that were the case then a lower proportion of households would be able to afford. The actual price of any affordable rented housing offered should be considered when deciding if it is genuinely affordable, and how much of any particular product is needed.

Table 5.8 Estimated Need for Affordable Rented Housing at Different Levels of Discount¹⁸

	% Need for Affordable Rented	Assumed Maximum Rent (2-bed)
Chorley	33%	£380
Preston	29%	£380
South Ribble	31%	£400

Source: Affordability analysis

Need for Affordable Home Ownership Housing

- 5.27 Using the previously established method to look at affordable need, it was estimated that there is a substantial need for additional affordable housing – this is for subsidised housing at a cost below that to access the private rented sector (i.e. for households unable to access any form of market housing without some form of subsidy). It would be expected that this housing would be delivered primarily as social/affordable rented housing.

¹⁸ Figures as % of those unable to afford to rent privately

5.28 The revised NPPF broadens the definition of affordable housing to include households which might be able to rent a home in the private sector without financial support but aspire to own a home and require support to do so. There are various 'affordable home ownership' products which are can meet the housing needs of this group.

5.29 This section considers the level of need for these types of dwellings in Central Lancashire. The NPPF states "*Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.*" (NPPF, para 64).

Establishing a Need for Affordable Home Ownership

5.30 The PPG confirms a widening definition of those to be considered as in affordable need; now including '*[households] that cannot afford their own homes, either to rent, or to own, where that is their aspiration*'. However, at the time of writing, there is no guidance about how the number of such households should be measured.

5.31 The methodology used in this report therefore draws on the current method as set out in PPG, and includes an assessment of current needs, projected need (newly forming and existing households). The key difference is that in looking at affordability an estimate of the number of households in the 'gap' between buying and renting is used – i.e. those households who can afford to rent a home without financial support but require support to access home ownership. There is also the issue of establishing an estimate of the supply of affordable home ownership homes – this is considered separately below.

5.32 The first part of the analysis seeks to understand what the gap between renting and buying actually means in Central Lancashire – in particular establishing the typical incomes in this bracket.

5.33 Using the income distributions developed for use in the previous analysis of affordable housing need, it has been estimated that of all households living in the private rented sector, around 9% of those living in Chorley fall into the "rent/buy gap" along with 11% of households in South Ribble; for Preston only 2% of households are estimated to fall into this gap. These figures have been based on an assumption that incomes in the private rented sector are around 88% of the equivalent figure for all households (a proportion derived from the English Housing Survey). These are used as it is clear that affordable home ownership products are likely to be targeted at households living in or who might be expected to access this sector (e.g. newly forming households).

5.34 To study current need, an estimate of the number of household living in the private rented sector (PRS) has been established, along with the same (rent/buy gap) affordability test described above.

The starting point is the number of households living in private rented accommodation (as of the 2011 Census). Data from the Survey of English Housing (EHS) suggests that since 2011, the number of households in the PRS has risen by about 26% and so this proportion is added to the initial estimate of the size of the sector to provide an estimate of the current size of the PRS.

- 5.35 Additional data from the EHS suggests that 60% of all PRS households expect to become an owner at some point and of these some 25% would expect this to happen in the next 2-years. This 25% figure is taken to provide an estimate of the current number of households living in the PRS who are seeking to become a homeowner in the short-term. The analysis then also considers newly forming households and also the remaining existing households who expect to become owners further into the future (i.e. those moving beyond the initial 2-year period).
- 5.36 Bringing the various strands of analysis together suggests that there is a gross need for around 21 affordable home ownership homes (priced for households able to afford to rent but not buy) per annum in the 2018-36 period. Around 90 of these are in Chorley and 115 in South Ribble, with a much lower figure in Preston – this reflects the relatively small gap in the income level required to buy or rent a home in the area.

Table 5.9 Estimated Gross Need for Affordable Home (per annum) – 2018-36

	Chorley	Preston	South Ribble	Central Lancashire
Current need	4	2	5	11
Newly forming households	75	19	94	187
Existing households falling into need	13	5	15	33
Total Gross Need	92	25	115	232

Source: Census (2011)/Projection Modelling and affordability analysis

Potential Supply of Housing to Meet the Affordable Home Ownership Need

- 5.37 At the current time the PPG does not include specific guidance about how the supply of housing to meet these needs should be calculated. Our estimates of need are based on households able to afford something between the lower quartile cost of renting and the lower quartile cost to buy.
- 5.38 Analysis of Land Registry data has therefore been undertaken to assess the number of homes sold at below lower quartile prices. However, it is the case that market housing is not allocated in the same way as social/affordable rented homes (i.e. anyone is able to buy a home as long as they can afford it and it is possible that a number of lower quartile homes would be sold to households able to afford more, or potentially to investment buyers).
- 5.39 Furthermore, some homes sold at below a lower quartile house price are in poor condition and in need of investment/ repair and may not therefore be suitable for lower income households. In addition, there will be some ‘resales’ of existing shared ownership and shared equity housing within

the three authorities. Drawing on data from the CoRe system, we note that between 2015/16 – 2017/18, there were 39 resales in Chorley (13 p.a.); 14 resales in Preston (5 p.a.) and 29 resales in South Ribble (10 p.a.). This will ultimately contribute to churn which helps to meet need.

- 5.40 A broad further assumption has been used for modelling purposes that around half of sales of homes below the lower quartile homes would be available to meet the needs of households with an income in the gap between buying and renting.
- 5.41 The table below brings together the analysis of need and supply. Once consideration is given to the role which cheaper open market housing has, the analysis does not suggest a net need to bring forward affordable home ownership housing in overall terms. Essentially households with an income whereby they can afford to rent privately without financial support but can't afford to buy at lower quartile prices will, in many cases, be able to buy a cheaper home such as existing terraced properties within the sub-region; and the cost of these will be cheaper in many instances than affordable home ownership products such as discounted market sales housing or starter homes.

Table 5.10 Estimated Need for Affordable Home Ownership – per annum

	Chorley	Preston	South Ribble	Central Lancashire
Current need	4	2	5	11
Newly forming households	75	19	94	187
Existing households falling into need	13	5	15	33
Total Gross Need	92	25	115	232
Supply (50% of LQ sales)	271	285	243	799
Net need	-179	-260	-128	-567

Source: Derived from Census (2011)/Projection Modelling/Land Registry and affordability analysis

Implications of the Analysis

- 5.42 It is clear from the wider analysis of market dynamics that there has been a significant growth of households living in the Private Rented Sector over recent years, with Census data showing that the number of households living in the sector increasing by 132% from 2001 to 2011 (with the likelihood that there have been further increases since). Over the same period, the number of owners with a mortgage dropped by 7%. Access to owner occupation is being restricted by the cost of housing to buy, access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially some mortgage restrictions (e.g. where employment is temporary).
- 5.43 The analysis above shows a need from households who require support to access home ownership but that the market is already supplying a reasonable number of homes that are affordable in the gap between renting and buying. The needs of these households can be met through a variety of means, including:

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- The various low-cost home ownership products identified in the NPPF Glossary, including discounted market sale and starter homes; shared ownership and shared equity housing;
 - Other Government initiatives which seek to broaden access to home ownership, including the Help-to-Buy scheme in which the Government lends up to 20% of the cost of a new-build home and purchasers only require a 5% deposit.
- 5.44 In bringing together evidence in the review of their local plans, the commissioning authorities need to consider the evidence of need, the relative acuteness of the need, and issues of residential development viability. The NPPF advises that at least 10% of all new housing on larger sites should be for affordable home ownership unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.
- 5.45 Given the analysis above, it would be reasonable to conclude, on the basis of the evidence, that in general terms there is no substantive need to provide housing under the new definition of ‘affordable home ownership.’ Overall whilst there are clearly some households in the gap between renting and buying, they in many cases will be able to afford homes below lower quartile housing costs. This said, it is important to recognise that some households will have insufficient savings to be able to afford to buy a home on the open market (in terms of the ability to afford both a deposit and stamp duty) and low cost home ownership homes - and shared ownership homes in particular - will therefore continue to play a role in supporting some households in this respect.
- 5.46 The evidence points to a clear and acute need for rented affordable housing from lower income households, and it is important that a supply of rented affordable housing – around 70% of which should reasonably be social rent - is maintained to meet the needs of this group including those to which the authorities have a statutory housing duty. Such housing is notably cheaper than that available in the open market and can be accessed by many more households (some of whom may be supported by benefit payments). Notably, social rents also enable access to employment for lower income families.
- 5.47 It should also be noted that the finding of a ‘need’ for affordable home ownership does not have any *direct* impact on the overall need for housing. As is clear from both the NPPF and PPG, the additional group of households in need is simply a case of seeking to move households from one tenure to another (in this case from private renting to owner-occupation); there is therefore no net change in the total number of households, or the number of homes required. Icení would also note that it is not appropriate to subtract the need for affordable home ownership housing from the rented housing: they are distinct and separate forms of need.
- 5.48 Through the plan-making process, the affordable housing need will be a consideration in assessing what level of overall housing provision and housing supply to plan for through the new Local Plan –

consistent with the approach set out in the PPG. These are however issues for plan-making, and not for assessing the five year housing land supply where Government policy/guidance is clear that the standard method should be used.

How Much Should Affordable Home Ownership Homes Cost?

- 5.49 The analysis and discussion above suggest that there are a number of households likely to fall under the new PPG definition of affordable housing need (i.e. in the gap between renting and buying) but that the potential supply of housing to buy makes it difficult to fully quantify this need (indeed there may well be a surplus). Hence, whilst the NPPF gives a clear steer that 10% of all new housing (on larger sites) should be for affordable home ownership, it is not clear that this is the best solution or indeed justified by the housing needs evidence.
- 5.50 Where affordable home ownerships are provided, then it is suggested that shared ownership is the most appropriate form of affordable home ownership due to lower likely deposit requirements, consideration of other packages such as providing support for deposits are also encouraged. However, it is possible that some housing would come forward as other forms of housing such as Starter Homes or discounted market sale. If this is the case, it will be important for the Councils to ensure that such homes are sold at a price that is genuinely affordable for the intended target group.
- 5.51 On this basis, it is worth discussing what sort of costs affordable home ownership properties should be sold for. The Annex 2 (NPPF) definitions suggest that such housing should be made available at a discount of at least 20% from Open Market Value (OMV). The problem with having a percentage discount is that it is possible in some locations or types of property that such a discount still means that housing is more expensive than that typically available in the open market.
- 5.52 The preferred approach in this report is to set out a series of affordable purchase costs for different sizes of accommodation. These are set out as a range with the bottom end being based on equivalising the private rent figures into a house price so that the sale price will meet the needs of all households in the gap between buying and renting. The upper level is set based on the estimated lower quartile price to buy a home (although it should be noted that in some instances the upper level is informed by private sector rents). Setting higher prices would mean that such housing would not be available to households for whom the Government is seeking to provide an 'affordable' option.

Table 5.11 Affordable home ownership prices – data for year to March 2019

	Chorley	Preston	South Ribble
1-bedroom	£63,000-£78,000	£56,000-£81,000	£67,000-£77,000
2-bedroom	£95,000	£78,000-£99,000	£95,000-£98,000
3-bedroom	£110,000-£135,000	£107,000-£108,000	£114,000-£138,000
4-bedroom	£160,000-£225,000	£136,000-£220,000	£147,000-£228,000

Source: derived from VOA data

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- 5.53 If the Councils do seek for some additional housing to be in the affordable home ownership sector, the Councils should liaise with the Help-to-Buy agent.

Affordable Housing: Summary and Conclusions

Our approach has been to consider the existing needs evidence, and to take account of the expanded definition of affordable housing which brings in households who might be able to afford to rent privately but aspire to own a home and require support to do so. The analysis brings together evidence of need. But in doing so it is important to recognise that there is some overlap between the 'target market' for affordable home ownership products and support provided by Help-to-Buy in helping households to access market housing.

Iceni conclude that there is a substantial need for additional affordable housing across all authority areas of Central Lancashire for those who cannot afford to rent; with a total need for 590 dwellings. All areas see a similar level of need, ranging from 132 in Chorley to 250 in Preston.

The analysis shows there is not a substantive need for affordable home ownership homes across all authority areas in Central Lancashire. On the basis of the evidence, the level of housing need does not justify 10% of housing to be delivered as affordable home ownership homes; and what provision is made for supporting home ownership should focus on shared ownership homes.

Given the clear and acute need for affordable rented housing, the Councils should look to seek as much rented affordable products as possible. The analysis identifies that between 29% and 33% of the group of households unable to afford market housing to rent fall in the gap between the market and 80% of the market depending on location. It is therefore suggested that a target of 30% of all rented affordable housing is affordable rents would be reasonable and therefore it appropriate that 70% of rented affordable housing is social rents.

In respect of affordable home ownership homes, these should take account of the price brackets shown for each of the authority areas in Table 5.12.

6. DEVELOPMENT DENSITIES

- 6.1 This section reviews the densities within the housing market area and considers an appropriate framework for increasing densities in each local authority in line with the Framework's drive to make the most efficient use of land.

Achieving Appropriate Development Densities

- 6.2 The Framework (paragraph 122) sets out that authorities should develop policies and support development that makes efficient use of land in order to achieve appropriate densities. As part of this, the need for different types of housing, local market conditions, the availability of infrastructure and services and the character and setting of an area should all be considered.
- 6.3 In the context of Green Belt authorities, making efficient use of land through maximising development densities is particularly important to ensure that sites in suitable locations, for example in towns and cities with good public transport links, are maximised before considering more constrained areas. It may be appropriate to consider a range of densities across an area which best reflect varying levels of accessibility and development potential before considering amendments to policy and environmental constraints.
- 6.4 On non-committed sites i.e. housing land supply which has not yet been permitted and can therefore be adjusted, the local authorities in Central Lancashire have applied a blanket 'density multiplier' assumption of 35 dwellings per hectare to generate an initial potential capacity figure on all sites submitted through the Call for Sites and SHELAA processes. However, the SHELAA does recognise that this will evolve over time as the Local Plan progresses (SHELAA paragraph 2.9.11).
- 6.5 It is important to recognise that increasing densities not only makes more efficient use of land, but it can help deliver high quality sustainable development and good quality places. If planned properly, higher density development can help create successful places with a range of house types, attract new employers to the area and reduce the amount of congestion and vehicle emissions as public transport provision is supported to a greater extent.
- 6.6 Invariably across the plan area and across the locality of each authority area, development proposals will be brought forward which seek to deliver housing at different densities taking account location-specific factors. It will be appropriate to build at densities which are appropriate to the local context which take account of the location of a site and the character of the surrounding area.
- 6.7 However, in the context of considering the distribution of housing need in the plan area and in the context of potential Green Belt release to otherwise accommodate this need; it is critical to consider

the contribution which building at higher densities could have on the HMA's existing housing land supply baseline. Development density assumptions need to be realistic, taking account of the nature of the local market.

Quantitative Analysis

- 6.8 Although research is limited at the national level, there are a small number of helpful studies which have considered the implications of housing type and size and densities. Research for the National Housing and Planning Advice Unit (NHPAU)¹⁹ sets out that net densities of new development in the North West region increased from 26 dwellings per hectare in 1996, to 42 dph in 2004 and 50 dph at the top of the market in 2006. The market has evidently shifted since, with less strength in the market for flatted development and a return to delivery of more traditional housing schemes.
- 6.9 The Ministry for Housing, Communities and Local Government no longer publish land use statistics at a local authority level. However, land use data is still available at local authority level for average densities built of the period from 1996 to 2011; and it therefore provides us with a helpful guide of densities achieved during the pre-economic downturn peak as well as during the economic downturn. This data is set out in the Figure below.

Table 6.1 Average Densities of Development Built in the HMA

	1996-1999	2000-2003	2004-2007	2008-2011
Chorley	19	22	40	31
Preston	26	30	56	48
South Ribble	27	22	31	27
England	25	28	41	42

MHCLG Land Use Statistics (1996 – 2011)

- 6.10 As the Table shows, average densities were highest in Preston during the pre-recession peak at 56 dwellings per hectare; before falling slightly to 48 dwellings per hectare. The average densities in Preston City have continuously been above the national average. Conversely, densities in Chorley were notably below the national average in each period, reaching 40 dwellings per hectare at the pre-recession peak. The same can be said for South Ribble; which only achieved an average density of 27 dwellings per hectare between 2008-2011.
- 6.11 Drilling into this, it can be said that Preston, as a City, has the largest existing population, workforce, services and infrastructure to support additional housing, and has historically applied higher

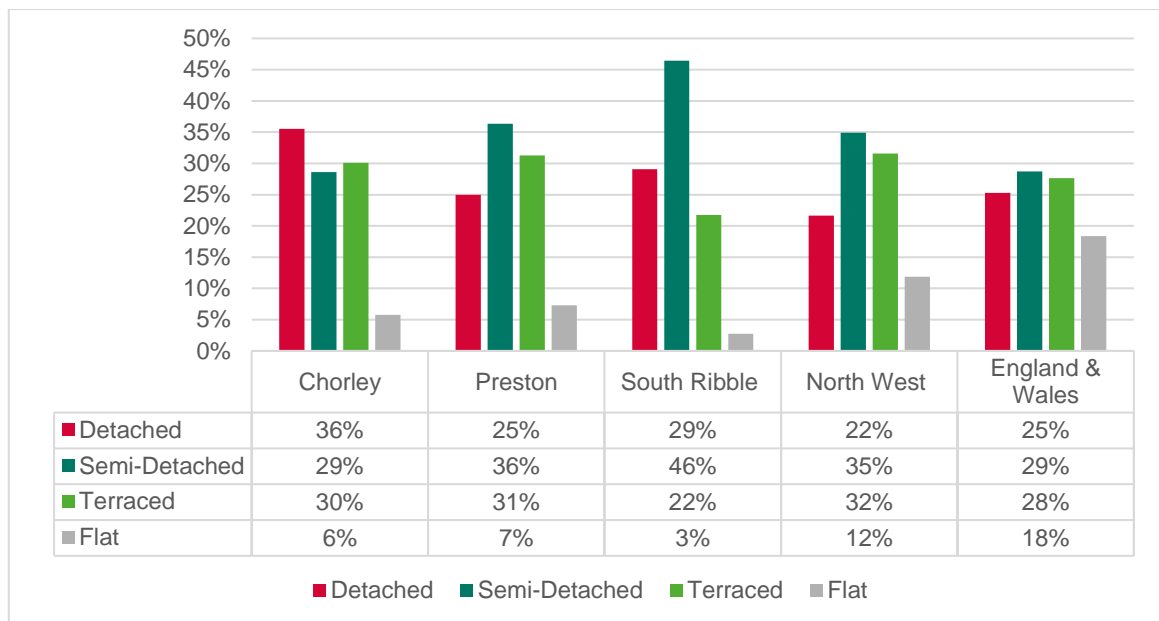
¹⁹ The Implications of Housing Type/Size Mix and Density for the Affordability and Viability of New Housing Supply, NHPAU (February 2010)

development densities than Chorley or South Ribble in order to make the most efficient use of land in this urban location. Chorley and South Ribble have applied lower development densities to best respond to the constraints and characteristics of these areas.

6.12 However, looking ahead, It should be borne in mind that as the strategic development sites around Preston begin to deliver; it is likely that we will begin to see the overall average density of development achieved in Preston fall – with the delivery of more housing as opposed to flatted and terraced development, which can generate higher densities.

6.13 Building on this, it is also important to consider the nature of the market across the three authorities; which can play an influence in achieving realistic densities. The Figure below sets out our analysis of the proportion of sales of different properties across the HMA in the last year.

Figure 6.1 Property Transactions by Type in Central Lancashire (2018)



Source: Land Registry Data

6.14 As the Table shows, there is certainly variations in relative demand for different products – although, it is acknowledged that this is partly influenced by stock mix. The analysis suggests a greater market for larger house types (i.e. non-terraced housing) in Chorley and South Ribble; with sales for these house types accounting for 65% and 75% respectively in 2018. This is set against a marginally higher level of demand for flatted and terraced housing in Preston.

6.15 Overall across Central Lancashire, the relatively modest flatted market – when compared with the regional and national picture – can be expected to have a downward influence on average densities in the area.

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- 6.16 On the basis of the evidence above, it is clear that a more nuanced approach to testing densities is required which is reflective of what has been achieved historically and what the market can achieve; acknowledging that the approach to densities will differ for suburban areas up to centres. This will have to be taken forward alongside other considerations such as design, setting context through the SHELAA process.
- 6.17 Ultimately this will ensure that the overall local housing need across the plan area can be addressed in line with the Framework's approach to exhausting brownfield land opportunities and making the most efficient use of land by maximising densities.

Qualitative Analysis

- 6.18 It is important to acknowledge that higher densities should not be conflated with tall buildings, a larger proportion of flatted development or smaller units. In considering higher densities in this report, we are principally concerned with developing compact neighbourhoods, which support a mix of uses; a range of house types, with viable public transport and local services.
- 6.19 It is widely accepted that 30 dph is not considered to be "high density", particularly when reviewing technical studies, examples of which define suburban densities, for example as (a) low - 35 dph, (b) intermediate - 50 dph and (c) high - 120 dph. The 2010 NHPAU Study (Table 2) found that newbuild development in the mid-north of England achieved average densities of 38.7 dph. in 2005. This data is now clearly out of date; but it does provide a helpful guide as to what has been achieved.
- 6.20 Academics have also contributed to the debate through literature reviews and studies, with Christine Whitehead from the London School of Economics²⁰ noting the influence density requirements have on typologies:

"The requirements also have direct impact on the types of dwelling that can be provided – as above around 60 dph the development must be mainly or entirely in the form of flats. As the requirement increases the more the need for high rise developments to meet the density requirement while at the same time meeting any outside space requirements. Moreover, the suggested average sizes imply a preponderance of one or two bedroom units".

- 6.21 Our analysis clearly indicates a greater focus of demand for housing rather than flatted development in Central Lancashire and it is clear that across the HMA as a whole, the focus of the market is for family homes. This is a consideration in establishing broad development density targets below.

²⁰ "The Density Debate: A Personal Review" (Christine Whitehead, LSE)

Recommended Approach to Densities

- 6.22 On the basis that the current Central Lancashire SHELAA has been prepared using a blanket approach to densities at 35 dwellings per hectare and in light of the Framework’s sequential approach to considering Green Belt land, it is considered necessary to set out a broad typology-based framework for development densities which can inform policies and ensure that urban capacity is maximised first.
- 6.23 Analysis of the profile of property transactions in the three authority areas shows that there is a greater focus towards typically larger detached homes with a relatively modest flatted market. A larger level of flatted development can be expected in Central Preston. However, densities of up to 50 dph can be achievable with schemes which predominantly include housing as opposed to flats.
- 6.24 The analysis of the need for different types of homes, as set out in Section 8, shows that it might be reasonable to see broadly a 70/30 split between development of houses as opposed to flats across Central Lancashire. It shows a slightly higher relative need for larger market homes (3+ bedrooms) in Preston relative to the other two authorities. Set against this, this is likely to be a slightly stronger market for flatted development in Central Preston than other locations within the HMA.
- 6.25 Bringing this analysis together, the Table below sets out broad density targets below for each authority using four broad types of location including rural locations (including villages), suburban locations, urban areas (i.e. urban fringe locations) and town centres. These should inform future iterations of the SHELAA where each of the location categories will be defined in detail.

Table 6.2 Recommended Broad Density Targets in Central Lancashire

	Rural / Village Locations	Suburban / Urban Extension	Town Centre / Central Preston
Chorley	25-30	35	40
Preston	25-30	35	50
South Ribble	25-30	35	40

- 6.26 This study does not seek to apply and quantify the impact of these density targets; nor does it assume that the density targets will result in a significant uplift to housing capacity; however, in the context of potential Green Belt release, it is considered that a more nuanced approach to densities is required and therefore due regard should be given to the broad density targets set out in Table 6.2; particularly in respect of the ongoing SHELAA process on sites without planning permission. The Councils should consult on the appropriateness of these density assumptions as the plan is developed.
- 6.27 As per the Framework (paragraph 120), planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability and as a result, the broad recommendations set out in

the Table above should be informed by local market conditions, viability as well as other factors including the prevailing character and appearance in an area which will vary on a site-by-site basis.

Achieving Appropriate Densities Summary and Conclusions

The Framework (paragraph 122) sets out that authorities should develop policies and support development that makes efficient use of land in order to achieve appropriate densities. As part of this, the need for different types of housing, local market conditions, the availability of infrastructure and services and the character and setting of an area should all be considered.

Historically, densities in Central Lancashire have not typically exceeded the national average; with densities reaching a height in Preston during the pre-recession peak of 56 dwellings per hectare. Analysis of recent transactions points towards a greater market for larger house types and family housing in each of the three authority areas alongside a relatively modest flatted market; with the needs evidence in this report pointing to c. 30% of the total need being capable of being met by development of flats and 70% houses.

Bringing this analysis together, Table 6.2 sets out broad density targets below for each authority using three broad locational typologies. This should inform future revisions to the SHELAA and policies within the Plan.

7. NEEDS OF OLDER PERSONS & THOSE WITH DIABILITIES

7.1 This section studies the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. It includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to accessibility and wheelchair standards M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'.

Understanding Demographic Changes

Current Population of Older People

7.2 The table below provides baseline population data about older persons and compares this with other areas. The data for has been taken from the published 2018 ONS mid-year population estimates. Central Lancashire has a similar proportion of older people as the North West and England with 18% of the population in 2018 being aged 65 and over.

Table 7.1 Older Persons Population (2018)

	Chorley	Preston	South Ribble	Central Lancs	Lancashire	North West	England
Under 65	80.3%	85.3%	78.9%	81.8%	79.5%	81.4%	81.8%
65-74	11.5%	8.0%	11.8%	10.2%	11.4%	10.2%	9.9%
75-84	6.1%	4.8%	6.8%	5.8%	6.6%	6.0%	5.8%
85+	2.1%	1.9%	2.5%	2.1%	2.6%	2.3%	2.4%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Total 65+	19.7%	14.7%	21.1%	18.2%	20.5%	18.6%	18.2%

Source: ONS 2018 Mid-Year Population Estimates

Future Change in the Population of Older People

7.1 As well as providing a baseline position for the proportion of older persons across the three authorities, population projections can be used to provide an indication of how the numbers might change in the future. The data presented below uses information from the projections previously developed to link to the standard method.

7.2 Taking into consideration these projections, Central Lancashire is projected to see a notable increase in the older person population, with the total number of people aged 65 and over projected to increase by 39% over the 20-years to 2036. This compares with overall population growth of 6.5% and a decrease in the Under 65 population of -0.8%.

7.3 In total population terms, the projections show an increase in the population aged 65 and over of 26,500 people. This is against a backdrop of an overall increase of 24,045. The population growth of people aged 65 and over therefore accounts for all of the total projected population change.

Table 7.2 Projected Change in Population of Older Persons (2018 to 2036) – Central Lancashire (based on delivery of 1,026 dwellings per annum)

	2016	2036	Change in population	% change
Under 65	301,958	299,501	-2,457	-0.8%
65-74	37,789	46,552	8,763	23.2%
75-84	21,546	31,230	9,684	44.9%
85+	7,873	15,929	8,056	102.3%
Total	369,166	393,211	24,045	6.5%
Total 65+	67,208	93,711	26,503	39.4%

Source: Demographic Projections

7.4 The Tables below provide a breakdown for each of the three authorities.

Table 7.3 Projected Change in Population of Older Persons (2018 to 2036) - Chorley (based on delivery of 282 dwellings per annum)

	2016	2036	Change in population	% change
Under 65	93,806	87,765	-6,041	-6.4%
65-74	13,418	16,405	2,987	22.3%
75-84	7,177	11,019	3,842	53.5%
85+	2,420	5,684	3,264	134.9%
Total	116,821	120,873	4,052	3.5%
Total 65+	23,015	33,108	10,093	43.9%

Source: Demographic Projections

Table 7.4 Projected Change in Population of Older Persons (2018 to 2036) - Preston (based on delivery of 410 dwellings per annum)

	2016	2036	Change in population	% change
Under 65	120,983	124,687	3,704	3.1%
65-74	11,300	14,287	2,987	26.4%
75-84	6,873	9,371	2,498	36.3%
85+	2,662	4,353	1,691	63.5%
Total	141,818	152,698	10,880	7.7%
Total 65+	20,835	28,011	7,176	34.4%

Source: Demographic Projections

Table 7.5 Projected Change in Population of Older Persons (2018 to 2036) - South Ribble (based on delivery of 334 dwellings per annum)

	2016	2036	Change in population	% change
Under 65	87,169	87,048	-121	-0.1%
65-74	13,071	15,860	2,789	21.3%
75-84	7,496	10,840	3,344	44.6%
85+	2,791	5,891	3,100	111.1%
Total	110,527	119,640	9,113	8.2%
Total 65+	23,358	32,592	9,234	39.5%

Source: Demographic Projections

Health-Related Population Projections

7.5 In addition to providing projections about how the number and proportion of older people is expected to change in the future the analysis can look at the likely impact on the number of people with specific illnesses or disabilities. For this, data from the Projecting Older People Information System (POPPI) and Projecting Adult Needs and Service Information System (PANSI) has been used. These sources provide prevalence rates for a range of different disabilities by age and sex.

7.6 The Table below show that many of the illnesses/disabilities are expected to increase significantly in the future as the population grows and ages. In particular, there is projected to be a 62% rise in the number of people with dementia aged 65 and over along with an increase in the number with mobility problems of 53% in the same age band.

Table 7.6 Projected Change in Population with a Range of Disabilities (2018 to 2036) – Central Lancashire (based on delivery of 1,026 dwellings per annum)

	Age Range	2018	2036	Change	% change
Dementia	65+	4,381	7,093	2,712	61.9%
Mobility Problems	65+	11,840	18,091	6,251	52.8%
Autistic Spectrum Disorders	18-64	2,251	2,237	-15	-0.7%
	65+	635	900	265	41.7%
Learning Disabilities	15-64	5,764	5,757	-7	-0.1%
	65+	1,403	1,941	537	38.3%
Challenging behaviour	15-64	106	105	0	-0.5%
Impaired mobility	16-64	12,032	11,683	-350	-2.9%

Source: POPPI/PANSI and demographic projections

7.7 The Tables below provide a breakdown for each of the three authorities.

Table 7.7 Projected Change in Population with a Range of Disabilities (2018 to 2036) – Chorley (based on delivery of 282 dwellings per annum)

	Age Range	2018	2036	Change	% change
Dementia	65+	1,431	2,507	1,076	75.2%
Mobility Problems	65+	3,934	6,393	2,459	62.5%
Autistic Spectrum Disorders	18-64	703	657	-47	-6.6%
	65+	220	319	99	45.3%
Learning Disabilities	15-64	1,789	1,684	-105	-5.9%
	65+	482	685	203	42.1%
Challenging behaviour	15-64	33	31	-2	-5.9%
Impaired mobility	16-64	3,979	3,866	-112	-2.8%

Source: POPPI/PANSI and demographic projections

Table 7.8 Projected Change in Population with a Range of Disabilities (2018 to 2036) – Preston (based on delivery of 410 dwellings per annum)

	Age Range	2018	2036	Change	% change
Dementia	65+	1,413	2,037	623	44.1%
Mobility Problems	65+	3,763	5,271	1,507	40.1%
Autistic Spectrum Disorders	18-64	911	953	42	4.6%
	65+	197	270	74	37.6%
Learning Disabilities	15-64	2,316	2,420	104	4.5%
	65+	433	581	148	34.2%
Challenging behaviour	15-64	42	44	2	3.9%
Impaired mobility	16-64	4,332	4,206	-126	-2.9%

Source: POPPI/PANSI and demographic projections

Table 7.9 Projected Change in Population with a Range of Disabilities (2018 to 2036) – South Ribble (based on delivery of 334 dwellings per annum)

	Age Range	2018	2036	Change	% change
Dementia	65+	1,537	2,550	1,013	65.9%
Mobility Problems	65+	4,143	6,428	2,285	55.2%
Autistic Spectrum Disorders	18-64	637	627	-10	-1.6%
	65+	219	310	91	41.8%
Learning Disabilities	15-64	1,659	1,653	-6	-0.4%
	65+	488	674	187	38.2%
Challenging behaviour	15-64	31	30	0	-0.6%
Impaired mobility	16-64	3,721	3,610	-111	-3.0%

Source: POPPI/PANSI and demographic projections

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- 7.8 Whilst many older persons will continue to live in mainstream housing, Iceni consider that it would be sensible to design housing so that it can be adapted to households changing needs. Subject to viability testing and site suitability (i.e. where level access is achievable), we would recommend that a third of all new housing is delivered to Part M4(2) 'accessible and adaptable' taking account of the evidence of need. This should be delivered where it feasible to do so (e.g. level access is possible).

Need for Specialist Accommodation for Older Persons

- 7.9 Given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward. The box below considers different types of older persons housing as set out in the Planning Practice Guidance. It should be noted that this report does not seek to address the first category (age-restricted housing without care or support) – this is because the focus of this analysis is around housing with a specific care or support need.

Definitions of Different Types of Older Persons' Accommodation

Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

Retirement living or sheltered housing [Housing with support]: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.

Extra care housing or housing-with-care [Housing with care]: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Residential care homes and nursing homes: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Source: PPG Housing for older and disabled people (paragraph 63-010)

- 7.10 The needs analysis in this section draws on data from the Housing Learning and Information Network (Housing LIN) Shop@ online toolkit (SHOP@ toolkit). This data is considered alongside

demographic projections to provide an indication of the potential level of additional specialist housing that might be required for older people in the future. The toolkit sets out a series of baseline rates which form a starting point for assessing appropriate prevalence rates to apply. These baseline rates are:

- Housing with Support (retirement/sheltered housing) – 125 units per 1,000 population aged 75 and over;
- Housing with Care (extra-care housing) – 45 units per 1,000 population aged 75 and over; and
- Residential care bedspaces (residential and nursing care) – 110 units (bedspaces) per 1,000 population aged 75 and over.

7.11 Following the Housing LIN methodology, an initial adjustment has then been made to these rates to reflect the relative health of the local older person population. This has been based on Census data about the proportion of people aged 65 and over who have a long-term health problem or disability compared with the England average. In Central Lancashire, the data shows very slightly higher levels of disability in the older person population and so the prevalence rates used have been increased slightly (very slight reduction for South Ribble).

7.12 A second local adjustment has been to estimate the tenure split for the housing with support and housing with care categories (no tenure is associated with residential care bedspaces). This again draws on suggestions in the Shop@ tool which suggests that less deprived local authorities could expect a higher proportion of their specialist housing to be in the market sector. Using the 2015 Index of Multiple Deprivation the analysis suggests a slightly higher need for market homes in South Ribble and lower in Preston (reflecting relative deprivation levels).

7.13 This analysis suggests a need for 174 units of accommodation per 1,000 population aged 75+, and of these 98 (57%) are for market housing.

7.14 The evidence herein suggests a greater need for specialist accommodation than Lancashire County Council's Housing with Care and Support Strategy which seeks to target provision of 15 units of housing with care per 1,000 population based on the current national level of provision. However there is a range of evidence that there is an under-provision and lack of choice of suitable specialist accommodation options for older people. Iceni's analysis takes this into account.

7.15 The analysis initially focusses on needs within self-contained units (which traditionally might be considered as a C3 use class (dwelling houses)) before separately looking at residential care bedspaces (which would arguably be in a C2 use class). This distinction is important as the dwelling-houses are included within the housing need (e.g. the figures calculated through the Standard Method) whereas bedspaces figures would be in addition to that.

7.16 The table below shows estimated needs for different types of housing linked to the agreed distribution of housing. The analysis shows a potentially high need for leasehold (market) accommodation as well as a need for affordable extra-care housing. There is an apparent surplus of retirement/sheltered housing in the affordable sector. Overall, the analysis suggests a need for 4,973 additional units by 2036 (equivalent to 276 per annum).

7.17 For residential care bedspaces, the analysis shows a small current shortfall but a notable projected future need. Overall, it is estimated that there is a need for around 2,288 additional bedspaces to 2036.

Table 7.10 Older Persons' Dwelling Requirements 2018 to 2036 – Central Lancashire (based on delivery of 1,026 dwellings per annum)

		Housing demand per 1,000 75+	Current supply	2018 demand	Current shortfall/ (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	53	2,648	1,563	-1,085	925	-160
	Leasehold	75	305	2,205	1,900	1,336	3,236
Housing with care	Rented	23	196	665	469	395	864
	Leasehold	23	78	691	613	420	1,033
Total (dwellings)		174	3,227	5,124	1,897	3,076	4,973
Care bedspaces		113	3,018	3,316	298	1,990	2,288

Source: Derived from Demographic Projections and Housing LIN/HOSPR/EAC

7.18 The Tables below provide an indicative breakdown for the three authorities.

Table 7.11 Older Persons' Dwelling Requirements 2018 to 2036 – Chorley (based on delivery of 282 dwellings per annum)

		Housing demand per 1,000 75+	Current supply	2018 demand	Current shortfall/ (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	51	630	493	-137	365	228
	Leasehold	76	0	730	730	540	1,270
Housing with care	Rented	22	48	211	163	156	319
	Leasehold	24	78	229	151	170	321
Total (dwellings)		173	756	1,663	907	1,232	2,139
Care bedspaces		112	839	1,076	237	797	1,034

Source: Derived from Demographic Projections and Housing LIN/HOSPR/EAC

Table 7.12 Older Persons' Dwelling Requirements 2018 to 2036 – Preston (based on delivery of 410 dwellings per annum)

		Housing demand per 1,000 75+	Current supply	2018 demand	Current shortfall/ (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	62	1,043	589	-454	259	-196
	Leasehold	72	190	683	493	300	793
Housing with care	Rented	26	74	246	172	108	281
	Leasehold	22	0	211	211	93	304
Total (dwellings)		181	1,307	1,729	422	760	1,182
Care bedspaces		117	1,265	1,119	-146	492	346

Source: Derived from Demographic Projections and Housing LIN/HOSPR/EAC

Table 7.13 Older Persons' Dwelling Requirements 2018 to 2036 – South Ribble (based on delivery of 334 dwellings per annum)

		Housing demand per 1,000 75+	Current supply	2018 demand	Current shortfall/ (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	47	975	481	-494	302	-192
	Leasehold	77	115	792	677	496	1,173
Housing with care	Rented	20	74	208	134	130	264
	Leasehold	24	0	250	250	157	407
Total (dwellings)		168	1,164	1,731	567	1,085	1,652
Care bedspaces		168	1,164	1,731	567	1,085	1,652

Source: Derived from Demographic Projections and Housing LIN/HOSPR/EAC

7.19 The figures provided above should be treated as indicative as there is no nationally agreed set of prevalence rates (or how these might be adjusted for local factors). The provision of housing with care will potentially be influenced by strategy decisions regarding the balance to which households needs should be met through extra care as against residential care. Lancashire County Council seeks to deliver extra care as an alternative to residential care, and the numbers above for housing with care should therefore be considered as minimum figures. The Councils should consider reviewing this evidence if a specific application comes in for older persons housing, where this is supported by its own needs assessment.

Older Persons' Housing, Planning Use Classes and Affordable Housing Policies

7.20 It is worth briefly discussing the Use Classes that Older Persons housing would fall into as there is some lack of clarity (particularly when it comes to Extra-care housing). The Use Classes Order sets out different categories of residential use and makes a distinction between residential institutions (Class C2) and dwelling-houses (Class C3). Care is defined in the Use Class Order as meaning

“personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care or children and medical care and treatment.” The C2/C3 distinction is important as it can impact on the ability of a local authority to seek an affordable housing contribution from a development in private-led development schemes (rather than those commissioned by a public body).

- 7.21 There is case law (at planning appeals and in the courts) on the definitions of both. There is clear no government guidance on which use class ‘extra care housing’ falls into. It is for the decision maker to decide, depending on the individual circumstances of each case. Government has released new Planning Practice Guidance of *Housing for Older and Disabled People* in June 2019. In respect of Use Classes, Para 63-014 therein states that:

“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”

- 7.22 The relevant factors identified in the Guidance are thus the level of care which is provided, and the scale of communal facilities. It is notable that no reference is made to whether units of accommodation have separate front doors. Iceniview this as consistent with the Use Class Order, where it is the ongoing provision of care which is the distinguishing feature within the C2 definition. In a C2 use, the provision of care is an essential and ongoing characteristics of the development and would normally be secured as such through the S106 Agreement.

- 7.23 Iceniview has reviewed a range of appeal decisions which have addressed issues relating to how to define the use class of a development. These are fact-specific, and there is a need to consider the particular nature of the scheme. What arises from this, is that schemes which have been accepted as a C2 use commonly demonstrate the following characteristics:

- a. Occupation restricted to people (at least one within a household) in need of personal care, with an obligation for such residents to subscribe to a minimum care package.

Whilst there has been debate about the minimum level of care to which residents must sign-up to, Iceniview’s view is that this should not be determinative given that a) residents’ care needs would typically change over time, and in most cases increase; and b) for those without a care need the relative costs associated with the care package would be off-putting.

- b. Provision of access to a range of communal areas and facilities, typically beyond that of simply a communal lounge, with the access to these facilities typically reflected in the service charge.

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- 7.24 Icenii however considers that the Use Class on its own need not be determinative on whether affordable housing provision could be applied. But nor does it provide any hook to justify seeking provision from a C2 use in the absence of a development plan policy which seeks to do so.
- 7.25 The 2019 NPPF sets out in Para 34 that Plans should set out the contributions expected from development, including levels of affordable housing. Such policies should not undermine the deliverability of the Plan. Para 62 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless off-site provision or a financial contribution can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 7.26 Para 63 states that affordable housing should not be sought from residential developments that are not major developments. Para 64 sets out that specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students) are exempt from the requirement for 10% of homes (as part of the affordable housing contribution) to be for affordable home ownership. But neither of these paragraphs set out that certain types of specialist accommodation for older persons are exempt from affordable housing contributions more widely.
- 7.27 The implication is that, in Icenii's view:
- The ability to seek affordable housing contributions from a C2 use at the current time influenced by how its current development plan policies were constructed and evidenced;
 - If policies in a new development plan are appropriately crafted, and supported by the necessary evidence on need and viability, affordable housing contributions could be sought from a C2 use through policies in a new Local Plan.
- 7.28 It is however important to recognise that the viability of extra care housing will differ from general mixed tenure development schemes, not least as there are typically significant levels of communal space and on-site facilities; higher construction and fit-out costs; and slower sales rates as there are less off-plan sales. There are also practical issues associated with how mixed tenure schemes may operate. The Councils needs to consider these issues in crafting policies.
- 7.29 It can be difficult in some circumstances for developers of specialist housing for older persons to compete with other developers for land.
- 7.30 To support the delivery of specialist accommodation, it may be appropriate for the Councils to consider making specific land allocations for specialist housing for older persons within new Local Plans.**

7.31 Ultimately for the purposes of seeking affordable housing, we would recommend that the Councils in developing new planning policies consider the specific viability of extra care housing schemes as part of preparing viability evidence within the plan-making process.

Wheelchair User Housing

7.32 Information about the need for housing for wheelchair users is difficult to obtain (particularly at a local level) National data within a research report by Habinteg Housing Association and London South Bank University (Supported by the Homes and Communities Agency) entitled *Mind the Step: An estimation of housing need among wheelchair users in England* has therefore been used. This report provides information at a national and regional level although there are some doubts about the validity even of the regional figures; hence the focus herein is on national data.

7.33 The report identifies that around 84% of homes in England do not allow someone using a wheelchair to get to and through the front door without difficulty and that once inside, it gets even more restrictive. Furthermore, it is estimated (based on English House Condition Survey data) that just 0.5% of homes meet criteria for ‘accessible and adaptable’, while 3.4% are ‘visitable’ by someone with mobility problems puts the proportion of ‘visitable’ properties at a slightly higher 5.3%.²¹

7.34 Overall, the report estimates that there is an unmet need for wheelchair user dwellings equivalent to 3.5 per 1,000 households.²² Moving forward, the report estimates a wheelchair user need from around 3% of households. Applying both of these figures to the demographic projections (see table below) suggests a need for around 1,100 wheelchair user homes in Central Lancashire in the period to 2036.

Table 7.14 Estimated Need for Wheelchair User Homes (2018-2036)

	Current Need	Projected Need (2018-36)	Total
Chorley	174	148	322
Preston	206	215	421
South Ribble	167	175	342
Central Lancashire	547	538	1,085

Source: Derived from Demographic Projections and Habinteg Prevalence Rates

7.35 Information in the CLG Guide to available disability data also provides some historical national data about wheelchair users by tenure (data from the 2007/8 English Housing Survey). This showed around 7.1% of social tenants to be wheelchair users, compared with 2.3% of owner-occupiers (there was insufficient data for private renting, suggesting that the number is low).

²¹ Data from the CLG Guide to available disability (taken from the English Housing Survey)

²² This is described in the Habinteg report as the number of wheelchair user households with unmet housing need

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- 7.36 This may impact on the proportion of different tenures that should be developed to be for wheelchair users (although it should be noted that the PPG (56-009) states that '*Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling*'). For market housing, policy can however require delivery of wheelchair-adaptable dwellings, this being a home that can easily be adapted to meet the needs of a household including wheelchair users.
- 7.37 Comparing the need for wheelchair dwellings shown to the Local Housing Need, the need for wheelchair user dwellings equates to about 6% of the total housing need.

Housing Needs of Older Persons and those with Disabilities: Summary and Conclusions

The analysis in this section has shown a notable growth in the population of older persons aged 65+ in Central Lancashire over the period to 2036. Within this, the number of people with a range of disabilities expected to increase by 9,393 across all three authorities. The specific projections undertaken include an expected increase of those with dementia by 2,712 and with mobility problems by 6,251 to 2036 across the plan area.

Many older households will continue to live in mainstream housing but given the substantial growth in the population of older persons and associated increases in those with a disability, it is appropriate for a third of new housing to be delivered to meet Part M4(2) accessible and adaptable home standards, subject to viability testing and site suitability. The evidence points to around 6% of homes needing to be wheelchair accessible/adaptable.

Some older households, particularly those aged over 75, will require specialist housing provision. The analysis in this section points to a need for 3,076 units of housing with support to 2036, and 1,897 units of housing with care. In considering extra-care schemes, there is a need to carefully consider the viability and practical feasibility of delivering affordable housing on-site. The need for housing with care should be treated as a minimum.

The analysis also identifies a need for 573 care home bedspaces in Central Lancashire to 2036. These will fall within a C2 use class.

8. NEED FOR DIFFERENT SIZES OF HOMES

8.1 This section considers the appropriate mix of market housing across the three Central Lancashire authorities; building on the analysis set out in the Central Lancashire SHMA. It seeks to update the analysis set out in the 2017 SHMA with regard to the local housing need established in this report.

Existing Housing Profile

8.2 In order to assess the needs for the different sizes of homes, we have developed a model which:

- Starts with the current profile of housing in terms of size (bedrooms) and tenure. Within the data, information is available about the age of households and the typical sizes of homes they occupy;
- Considers which age groups are expected to change in number, and by how much using the demographic projections. On the assumption that occupancy patterns for each age group (within each tenure) remain the same, it is therefore possible to work out what profile of housing is needed over the assessment period to 2036.

8.3 An important starting point is to understand the current balance of housing in each area. The table below profiles the sizes of homes in different tenure groups. This shows that the profile of housing in Central Lancashire looks to be fairly balanced in comparison with other areas (i.e. there is not obvious over or under supply of particular sizes of homes relative to other locations) although there are some differences across locations (the profile of the private rented sector in Preston being the most notable). Observations about current mix feed into conclusions about future mix later in this section.

Table 8.1 Number of Bedrooms by Tenure, 2011

		Chorley	Preston	South Ribble	Central Lancs	Lancashire	North West	England
Owner-Occupied	1 Bed	2%	3%	2%	2%	2%	2%	4%
	2 Bed	23%	23%	22%	22%	27%	24%	23%
	3 Bed	49%	53%	53%	51%	47%	52%	48%
	4+ Bed	26%	22%	24%	24%	23%	22%	25%
	Total	100%	100%	100%	100%	100%	100%	100%
Social Rented	1 Bed	32%	36%	33%	34%	37%	29%	31%
	2 Bed	33%	29%	31%	31%	31%	32%	34%
	3 Bed	31%	32%	33%	32%	29%	34%	31%
	4+ Bed	3%	4%	3%	3%	4%	4%	4%
	Total	100%	100%	100%	100%	100%	100%	100%
	1 Bed	15%	21%	10%	17%	16%	18%	23%

Private Rented	2 Bed	41%	37%	41%	39%	44%	43%	39%
	3 Bed	35%	29%	39%	33%	30%	30%	28%
	4+ Bed	9%	13%	9%	11%	10%	9%	10%
	Total	100%	100%	100%	100%	100%	100%	100%

Source: Census 2011

Projected Change in Household Structure

- 8.4 The analysis in the Table below shows how the profile of different types of household are expected to change over the period from 2018 to 2036 (linked to the redistributed standard method figures). The strongest growth in Central Lancashire is expected in coupled households aged over 65.

Table 8.2 Change in Household Types in Central Lancashire, 2018-36

	2018	2036	Change	% Change
One-person household (aged 65 and over)	19,571	24,195	4,623	23.6%
One-person household (aged under 65)	28,333	32,016	3,683	13.0%
Couple (aged 65 and over)	19,193	28,380	9,187	47.9%
Couple (aged under 65)	21,662	17,189	-4,474	-20.7%
A couple and one or more other adults: No dependent children	12,049	12,107	59	0.5%
Households with one dependent child	22,286	25,369	3,083	13.8%
Households with two dependent children	16,639	16,844	205	1.2%
Households with three dependent children	6,596	6,360	-236	-3.6%
Other households ²³	9,959	11,759	1,800	18.1%
TOTAL	156,288	174,219	17,930	11.5%
Total households with dependent children	45,520	48,573	3,052	6.7%

Source: Demographic Projections

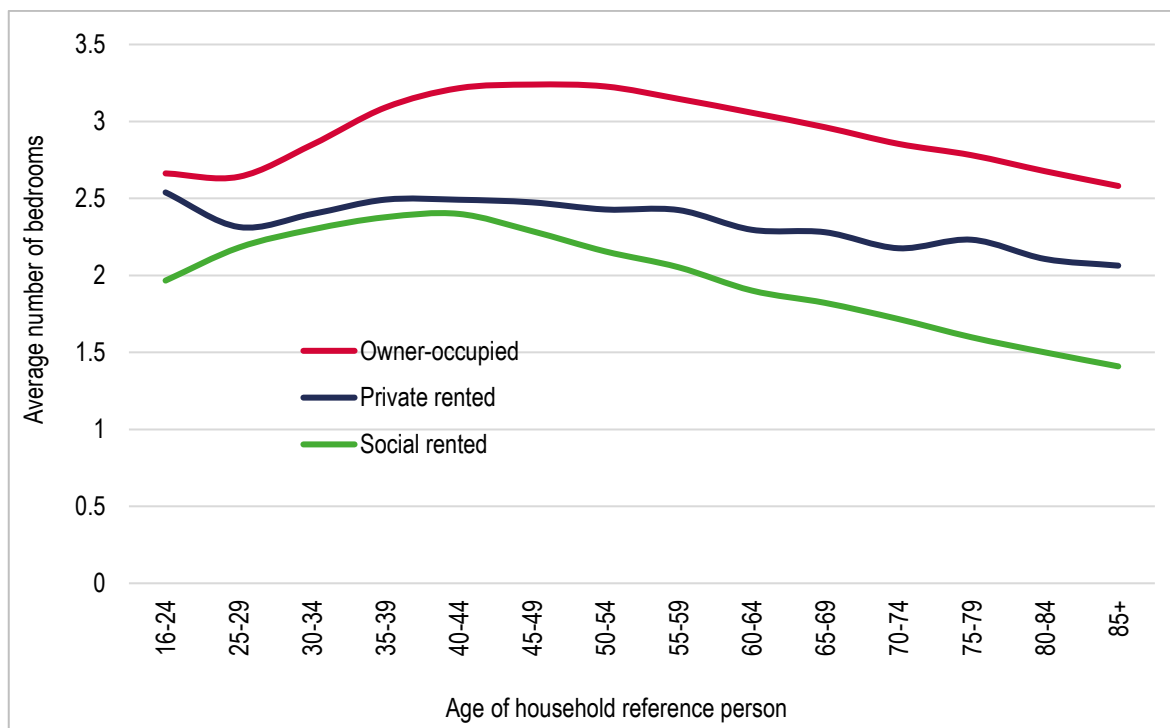
- 8.5 There is also growth expected in both family households (6.7%) and other households (18.1%) as well as single person households aged under 65. A detailed breakdown for each authority is provided at Appendix A1.

²³ Multi-person households including unrelated adults sharing, student households, multi-family households and households of one family and other unrelated adults.

Overview of the Methodology

- 8.6 The method to consider future housing mix looks at the ages of the Household Reference Persons (HRP – often more normally called the head of household) and how these are projected to change over time.
- 8.7 Whilst the demographic projections provide a good indication of how the population and household structure will develop, it is not a simple task to convert the net increase in the number of households into a suggested profile for additional housing to be provided. The main reason for this is that in the market sector, households are able to buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.
- 8.8 The size of housing which households occupy relates more to their wealth and age than the number of people they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a 4-bedroom home as long as they can afford it, and hence projecting an increase in single person households does not automatically translate into a need for smaller units.
- 8.9 That said, issues of supply can also impact occupancy patterns, for example it may be that a supply of additional smaller bungalows (say 2-bedrooms) would encourage older people to downsize but in the absence of such accommodation these households remain living in their larger accommodation. The issue of choice is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) although there will still be some level of under-occupation moving forward with regard to older person and working households who may be able to under-occupy housing (e.g. those who can afford to pay the 'bedroom tax').
- 8.10 The approach used is to interrogate information derived in the projections about the number of household reference persons (HRPs) in each age group and apply this to the profile of housing within these groups. The data for this analysis has been formed from a commissioned table by ONS (table CT0621 which provides relevant data for all local authorities in England and Wales from the 2011 Census).
- 8.11 The figure below shows an estimate of how the average number of bedrooms varies by different ages of HRP and broad tenure group for Central Lancashire. In the owner-occupied sector the average size of accommodation rises over time to typically reach a peak around the age of 50; a similar pattern (but with smaller dwelling sizes) is seen in the social sector and to a lesser extent private rented housing. After peaking, the average dwelling size decreases – as typically some households downsize as they get older.

Figure 8.1 Average Bedrooms by Age and Tenure – Central Lancashire



8.12 In terms of the analysis to follow, the outputs have been segmented into three broad categories. These are market housing, which is taken to follow the occupancy profiles in the owner-occupied sector; affordable home ownership, which is taken to follow the occupancy profile in the private rented sector (this is seen as reasonable as the Government’s desired growth in home ownership looks to be largely driven by a wish to see households move out of private renting) and affordable (rented) housing, which is taken to follow the occupancy profile in the social rented sector. The affordable sector in the analysis to follow would include affordable rented housing.

Modelled Outputs

8.13 By following the methodology set out above and drawing on the sources shown, a series of outputs have been derived to consider the likely size requirement of housing in each of the three broad tenures.

Table 8.3 Modelled Mix of Housing by Size and Tenure in Central Lancashire, 2018-36

	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ Bedrooms
Market Housing	3%	36%	52%	9%
Affordable Home Ownership	22%	40%	28%	10%
Rented Affordable	45%	27%	25%	3%

Source: Housing Market Model

8.14 The analysis clearly shows the different profiles in the three broad tenures with affordable housing being more heavily skewed towards smaller dwellings, and affordable home ownership sitting somewhere in between the market and affordable housing.

8.15 Similar patterns can be seen in each of the individual local authority areas although it is notable that the profile of dwellings required is generally slightly larger in Preston and generally smaller in Chorley. This to some extent reflects the agreed distribution of housing whereby Chorley sees greater proportionate growth in older person households and lower increases in families – this pushes the need towards smaller dwellings.

Table 8.4 Modelled Mix of Housing by Size and Tenure in Chorley

	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ Bedrooms
Market Housing	2%	41%	53%	3%
Affordable Home Ownership	30%	39%	26%	5%
Rented Affordable	53%	26%	19%	3%

Table 8.5 Modelled Mix of Housing by Size and Tenure in Preston

	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ Bedrooms
Market Housing	3%	29%	53%	15%
Affordable Home Ownership	23%	37%	22%	18%
Rented Affordable	42%	27%	28%	3%

Table 8.6 Modelled Mix of Housing by Size and Tenure in South Ribble

	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ Bedrooms
Market Housing	4%	41%	51%	4%
Affordable Home Ownership	13%	44%	36%	6%
Rented Affordable	45%	28%	26%	2%

8.16 For comparison, the table below shows the need for different sizes of affordable rented accommodation households shown on the Housing Register. This represents a need for affordable (rented) housing.

Table 8.7 Profile of Rented Affordable Need by Households on the Housing Register

	Chorley	Preston	South Ribble	Central Lancs
1 Bedroom	56%	48%	53%	51%
2 Bedrooms	28%	31%	30%	30%
3 Bedrooms	12%	16%	15%	15%
4+ Bedrooms	3%	5%	2%	4%
Total	100%	100%	100%	100%

Indicative Targets for Different Sizes of Properties by Tenure

Rented Affordable Housing

- 8.17 Whilst the output of the modelling provides estimates of the proportion of homes of different sizes that are needed, there are a range of factors which should be taken into account in setting policies for provision.
- 8.18 Considerations include the relative lack of past delivery of larger affordable homes. Larger affordable housing units also have a relatively low turnover. As a result, whilst the number of households coming forward for 4+-bedroom homes is typically quite small, the ability for these needs to be met is even more limited.
- 8.19 For these reasons, it is suggested in converting the long-term modelled outputs into a profile of housing to be provided (in the affordable sector) that the proportion of 1-bedroom homes is slightly reduced from the local-based outputs, along with a commensurate increase in 4+-bedroom homes. At an HMA-wide level, the analysis would support policies for the mix of **rented affordable housing**²⁴ of:
- 1-bed properties: 40%
 - 2-bed properties: 30%
 - 3-bed properties: 20%
 - 4+-bed properties: 10%
- 8.20 These conclusions recognise the role which delivery of larger family homes can play in releasing a supply of smaller properties for other households; together with the limited flexibility which 1-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.

²⁴ By affordable rented housing in this context, we mean social rented; affordable rented; and affordable private rented homes.

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- 8.21 The need for affordable housing of different sizes may vary by area (at a more localised level) and over time. In considering the mix of homes to be provided within specific development schemes, this information should **be brought together with details of households currently on the Housing Register in the local area and the stock and turnover of existing properties.**

Affordable Home Ownership

- 8.22 In the affordable home ownership and market sectors a profile of housing that more closely matches the outputs of the modelling is suggested. On the basis of these factors it is considered that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households. On this basis the following mix of **affordable home ownership** is suggested:

- 1-bed properties: 20%
- 2-bed properties: 45%
- 3-bed properties: 25%
- 4+-bed properties: 10%

Market Housing

- 8.23 Finally, in the market sector, a balance of dwellings is suggested that takes account of both the demand for homes and the changing demographic profile. This sees a slightly larger recommended profile compared with other tenure groups. The following mix of **market housing** is suggested:

- 1-bed properties: 5%
- 2-bed properties: 35%
- 3-bed properties: 45%
- 4+-bed properties: 15%

- 8.24 The analysis of market housing need has quantified this on the basis of the market modelling and an understanding of the current housing market. It applying this to individual development sites, consideration could also reasonably be given to the nature of and gaps in the current housing offer at the local level, the pipeline of housing of different sizes and the character of the area and nature of the site.

- 8.25 The Councils should also consider the potential role of bungalows as part of the future mix of housing. Such housing may be particularly attractive to older owner-occupiers (many of whom are equity-rich) which may assist in encouraging households to downsize. However, the downside to providing bungalows is that they are relatively land intensive for the amount of floorspace created.

- 8.26 The recommendations can also be used as a set of guidelines to consider the appropriate mix on larger development sites, and Icen consider that it would be reasonable to expect justification for a housing mix on such sites which significantly differs from that modelled herein.

The Need for Different Sizes and Types of Homes: Summary and Conclusions

Understanding the existing housing mix in a place is important in considering what future mix of housing is appropriate to deliver a mixed and balanced community. This is important at both a strategic, and at a local, level

The analysis shows a fairly balanced profile of housing in Central Lancashire compared with other areas. Although there are some differences across locations (the profile of the private rented sector in Preston being the most notable)

Taking into account the current housing stock and expected demographic trends – including the expectation that some older households will downsize if the right properties are available), the assessment points to a need for different types of homes in the market and affordable housing sectors as set out in paragraphs 7.16, 7.19 and 7.20.

These strategic conclusions should be brought together with local evidence, such as information on current stock and needs profile at a more local level, in considering the appropriate mix of housing on individual development sites.

9. EMERGING MARKET SEGMENTS

9.1 This section considers emerging segments of the housing market including the needs of those who wish to build their own homes and those who wish to rent their homes.

Build to Rent Development

9.2 The Private Rented Sector has been the key growth sector in the housing market for the last 15 years and now makes up just over 20% of all UK households. Since 2011, the private rented sector has been the second largest housing tenure in England behind owner-occupation, overtaking social housing.

9.3 In the context of the sector's growth over the last 20 years and a national housing shortage, successive Governments have looked to the Private Rented Sector to play a greater role in providing more new build housing and have sought to encourage "Build-to-Rent" development.

9.4 Build-to-Rent development is defined in the NPPF Glossary as "*purpose-build housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership or management control.*" It represents development which is constructed with the intention that it will be let (rather than sold).

9.5 The benefits of Build to Rent are strong and are best summarised in the Government's *A Build to Rent Guide for Local Authorities*²⁵ which was published in March 2015. The Guide notes the benefits are which ranging but can include:

- Helping local authorities to meet demand for private rented housing whilst increasing tenants choice "as generally speaking tenants only have the option to rent from a small-scale landlord".
- Retaining tenants for longer and maximising occupancy levels as Build to Rent investment is an income focused business model;
- Helping to increase housing supply, particularly on large, multiple phased sites as it can be built alongside build for sale and affordable housing; and

²⁵ Accelerating housing supply and increasing tenant choice in the private rented sector: A Build to Rent Guide for Local Authorities (DCLG, March 2015)

-
- Utilising good design and high-quality construction methods which are often key components of the Build to Rent model.

9.6 The 2019 NPPF now recognises the emergence of the strength of the Private Rented Sector. The Framework (paragraph 61) says the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including those people who rent their homes (as separate from those in affordable housing need). The Framework's glossary also introduces a definition for Build to Rent development (as defined above), thus recognising it as a sector.

9.7 Over recent years there has been a rapid growth in the Build to Rent sector backed by domestic and overseas institutional investment. BTR accounted for 8.7% of new housing starts in 2016/17 whilst latest research from Savills (2018) for the 12 month period to Q4 2018 indicates a 29% increase in BTR unit completions (over 29,400), over 43,300 units under construction (a 39% increase) and 66,700 in a substantial planning pipeline (10% increase). Taken together, this total of 139,500 units accounts for a 22% increase since Q4 2017.

9.8 In terms of age profile, research by JLL²⁶ focused on BTR case studies identified tenants typically in the 25-35 age bracket with an average tenant age of 31 and occupiers who were above average earners, seeking apartments or flats in urban conurbations, together with 'satellite' towns near to or commutable to the centres of employment.

9.9 In Central Lancashire, there has been significant growth in the Private Rented Sector across all three authorities. The Figures below show the growth of the sector over the last three census points within Chorley, Preston and South Ribble.

²⁶ JLL Research (2018) Build to Rent

Figure 9.1 Growth of the Private Rented Sector in Chorley

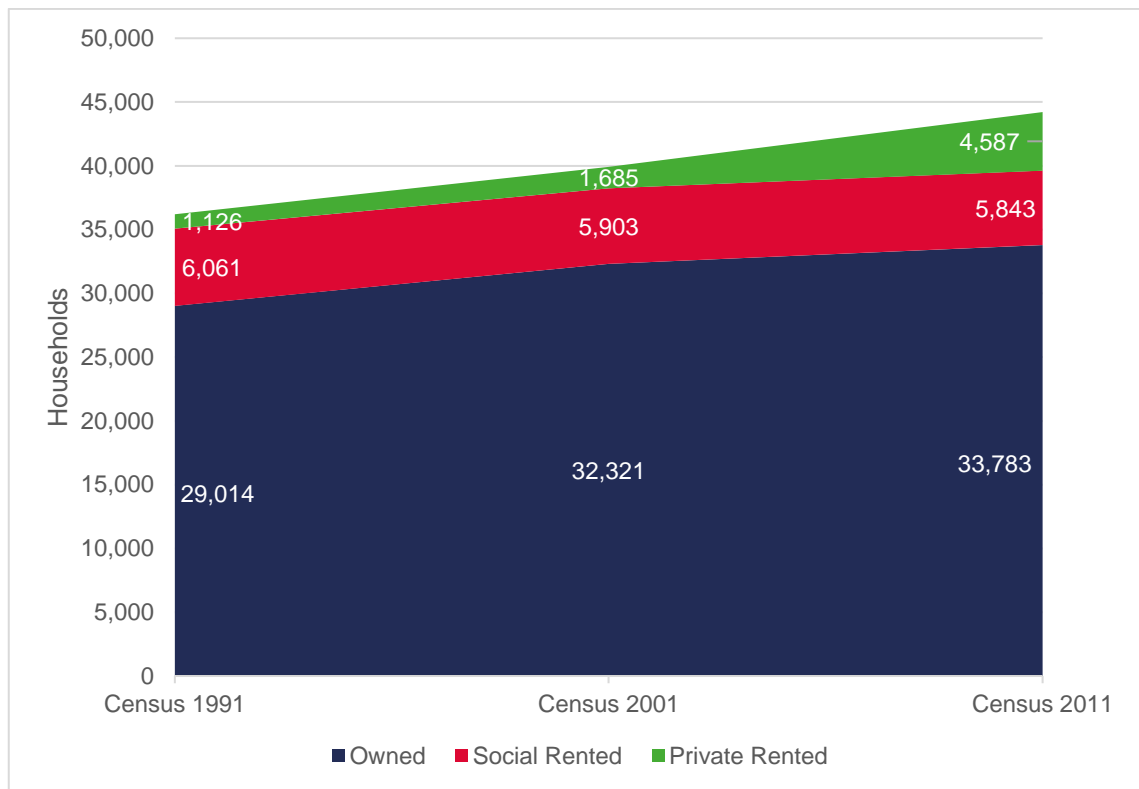


Figure 9.2 Growth of the Private Rented Sector in Preston

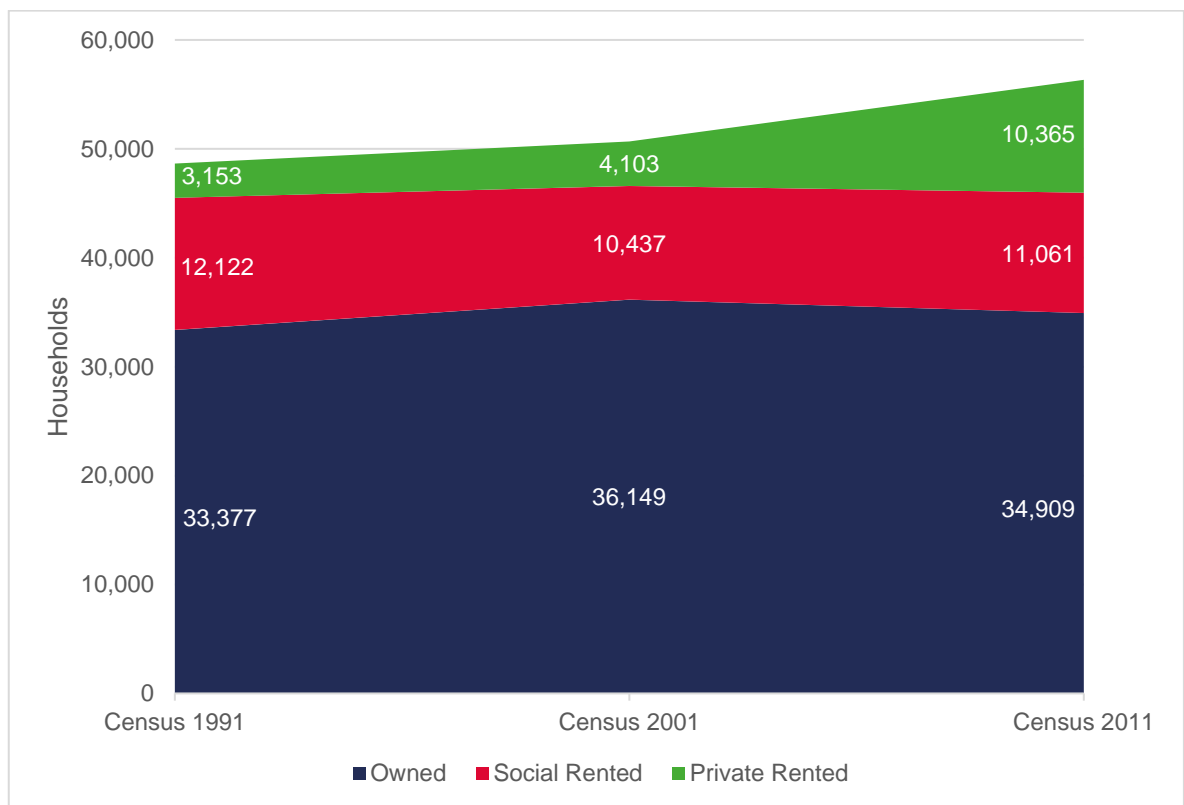
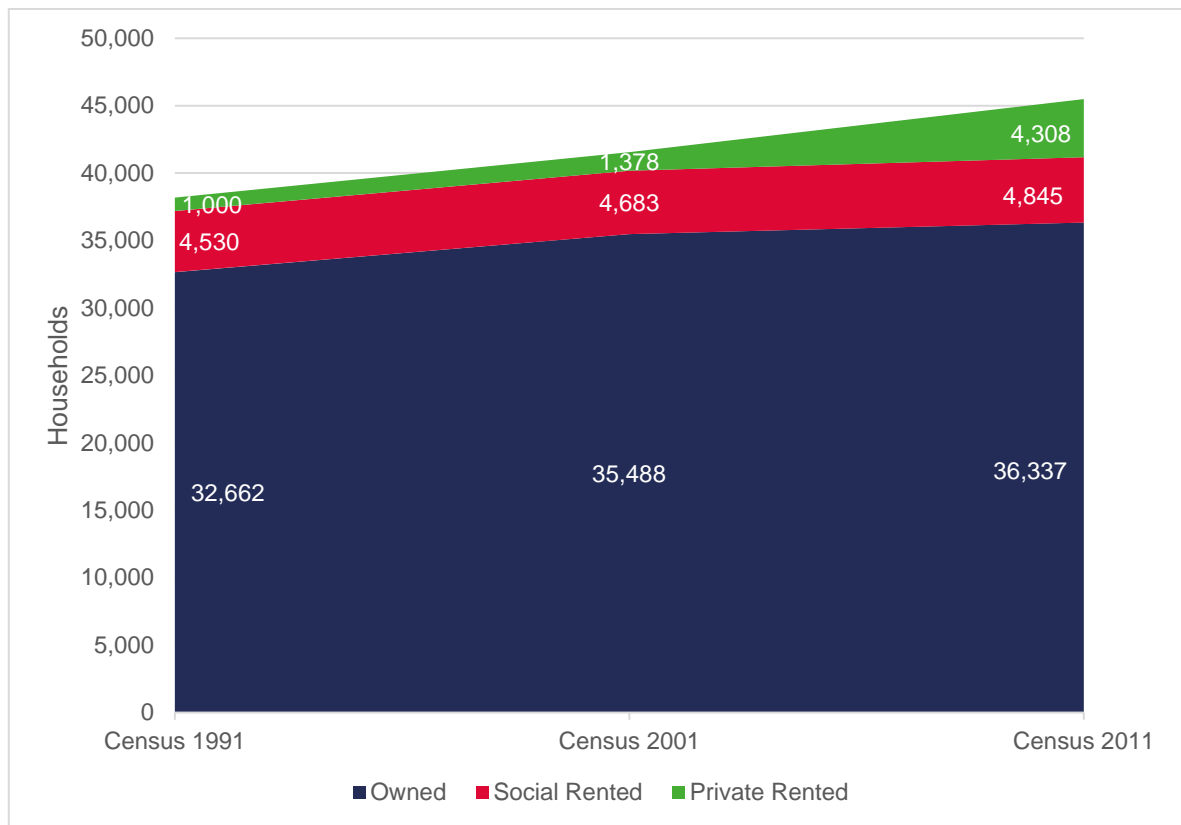


Figure 9.3 Growth of the Private Rented Sector in South Ribble



9.10 Across the three Central Lancashire authorities, Preston has seen the largest household increase in the private rented sector over the last three census points at 7,212 households; with private renting comprising 6% of all households in 1991, rising to 18% in 2011. Chorley and South Ribble have seen a proportionate increase in the private rented sector of around 7%. However notably, across all authorities the private rented sector remained the third largest sector despite the private rented sector being the second largest nationally.

9.11 Recent data published by Shelter (July 2018) looks at growth in the private rented sector by local authority between the point of the 2011 Census to data collected by YouGov in 2018. The evidence clearly points to further significant growth in the private rented sector in Central Lancashire since 2011. However, due to the survey-based nature of the dataset, undue reliance should not be placed on the specific figures in Figures 10.4 to 10.6. Nevertheless, it is clear the sector has continued to grow over the period since the last Census in 2011.

Figure 9.4 Tenure Change In Chorley, 2001-2018

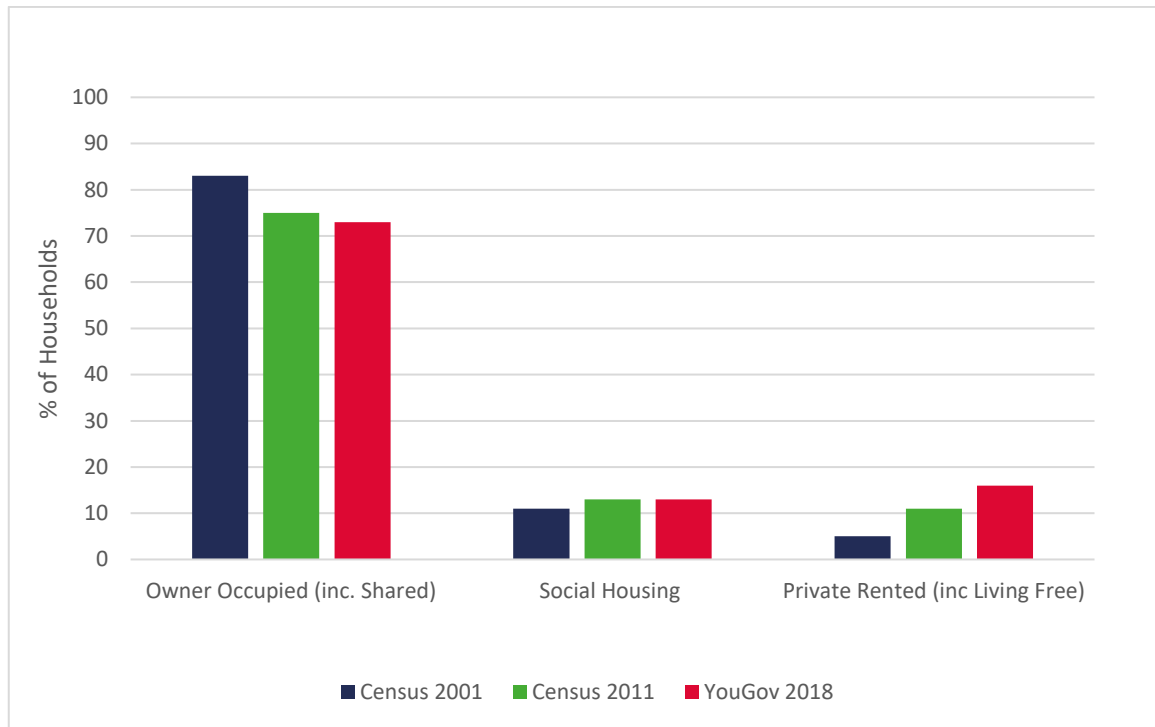


Figure 9.5 Tenure Change In Preston, 2001-2018

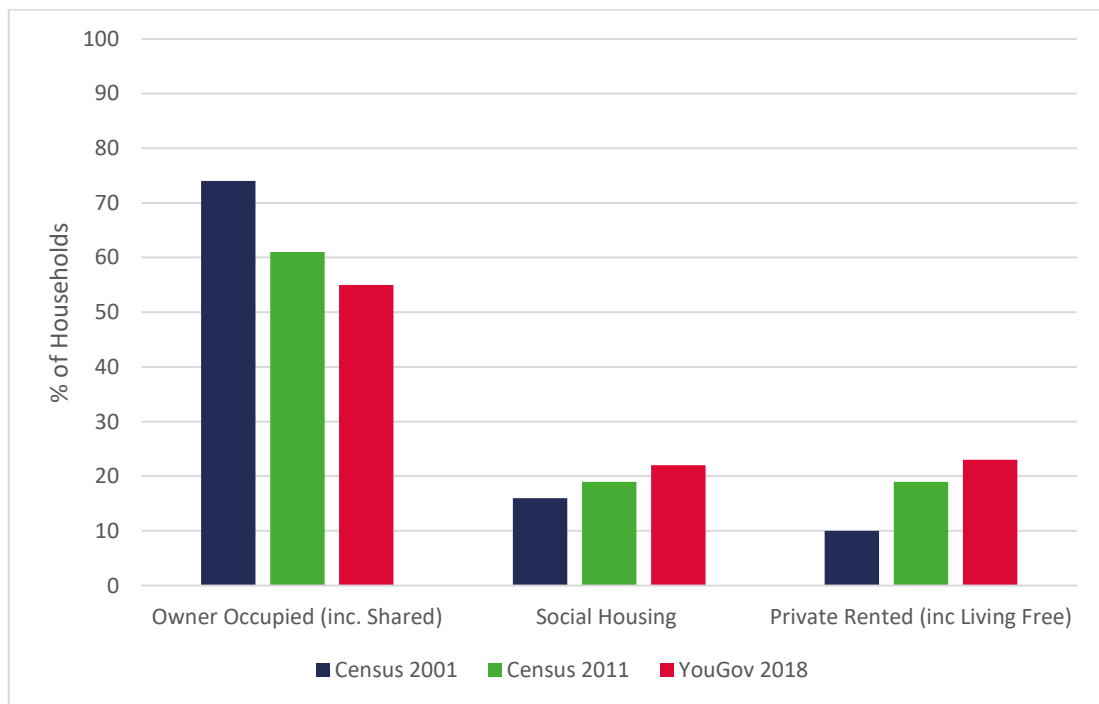
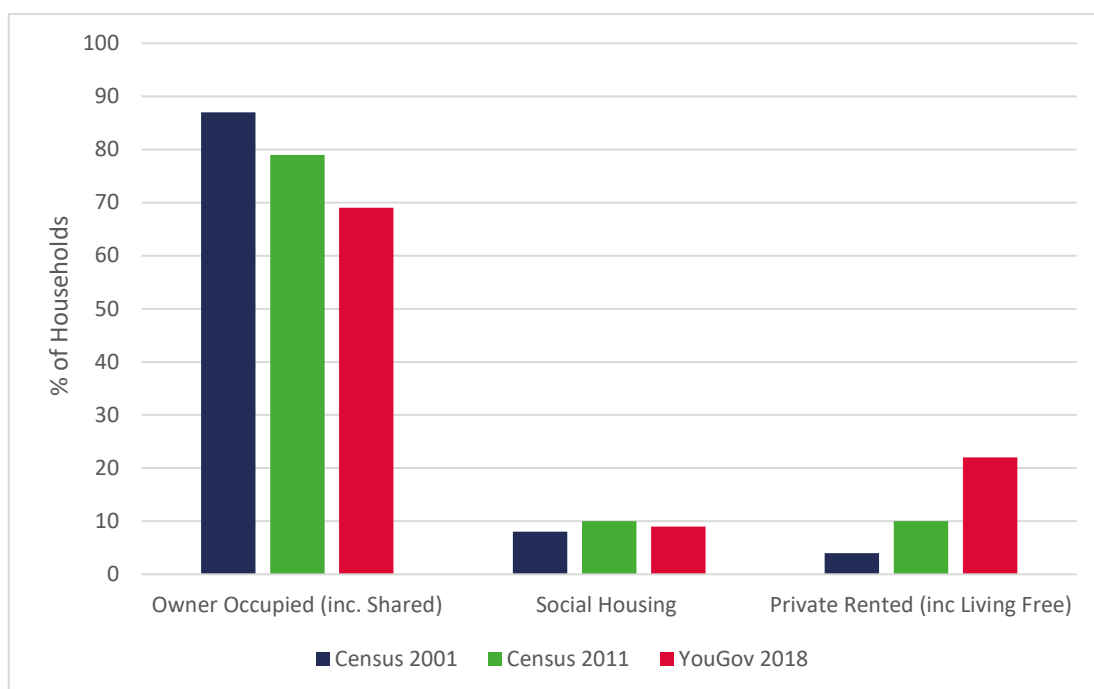


Figure 9.6 Tenure Change In South Ribble, 2001-2018



9.12 The Figures above show that across all three authorities, the private rented sector is now believed to be the second largest sector. Over the period from 2011 to 2018, the analysis shows that South Ribble has seen the greatest increase in the private rented sector since the 2011 Census, with a percentage increase of 12 percentage points (pp). Chorley has seen a 5pp increase and Preston has seen an increase of 4pp in the private rented sector; with the Preston private rented sector still the largest in Central Lancashire.

9.13 Turning to the private rental market, we have also reviewed current private rents in Central Lancashire against the relevant comparators. The data is drawn from the Valuation Office Agency “VOA” as at year end September 2018. The Table below sets out median rents by property size for each of the Central Lancashire authorities, the North West and England.

Table 9.1 Median Rents by Property Size, 2018

Local Authority	Room	Studio	1 Bed	2 Beds	3 Beds	4+ Beds	All
Chorley	£-	£-	£400	£525	£625	£900	£550
Preston	£347	£400	£425	£525	£595	£850	£525
South Ribble	£450	£330	£425	£548	£625	£875	£575
North West	£368	£395	£450	£550	£625	£900	£550
England	£390	£575	£600	£650	£750	£1,320	£690

9.14 The Table shows relatively low median rental values across Central Lancashire on a size by size basis in comparison to the national average, with the exception of single room rents in South Ribble. Median rental values in Central Lancashire are also generally slightly lower than the regional

average. Across all property sizes the median rental value for the Central Lancashire authorities ranges from £525 PCM in Preston, to £575 in South Ribble. This is broadly consistent with the regional median (£550) but between 31% and 20% lower than the national median.

- 9.15 The Build-to-Rent sector is one which we would describe as relatively 'embryonic' outside London and the Core Cities. It has developed over the last few years to a position where there are now a range of schemes in London, and schemes coming forwards in other Core Cities, but in many other areas there has been limited provision to date. In the short-term, it seems likely that the relative low private rental values may inhibit BTR investment in Central Lancashire.
- 9.16 The adopted Central Lancashire Core Strategy does not contain policies related specifically to the Build to Rent sector, although this in part reflects the recent emergence of the sector and changes to national planning policies concerning the status and importance of Build to Rent as part of the rental market. Linked to this, it is not surprising that there are currently no Build to Rent schemes in any of the three authority areas.
- 9.17 The PPG recognises that where a need is identified, that local planning authorities should include a specific plan policy relating to the promotion and accommodation of build to rent, including the circumstances and locations where build to rent schemes would be encouraged. It identifies town centre regeneration areas and parts of large sites as examples.
- 9.18 Icenii would expect based on the current evidence and values that there would be limited market interest in build-to-rent development in Central Lancashire in the short-term. In the medium-term, there is some potential in central Preston in particular. Build-to-Rent development will cater for a different market segment from 'for sale' housing and has the potential to assist in boosting housing delivery rates.
- 9.19 In respect of the dwelling mix within a Build-to-Rent Scheme, we would expect the focus to be on 2 and 3-bed properties given the occupancy profile associated with private rented accommodation (see Table 7.1). The sector can be expected to accommodate households typically aged in the 25-40 bracket who are unable to afford to buy a home; but may also include some older households looking for flexibility or whose circumstances have changed (e.g. divorcees). Given that this is a relatively embryonic sector, we would recommend that the Councils are not overly prescriptive on the mix of dwelling sizes within new Build-to-Rent development.
- 9.20 The NPPF definition of Build-to-Rent development sets out that schemes will usually offer tenancy agreements of three or more years and will typically be professionally managed stock in single ownership and management control. It would be appropriate for the Councils to adopt a consistent definition.

9.21 The Councils will need to consider affordable housing policies specifically for the Build-to-Rent sector. The viability of Build-to-Rent development will however differ from that of a typical mixed tenure development: returns from the BTR development are phased over time whereas for a typical mixed tenure scheme, capital receipts are generated as the units are completed. There is potential for a proportion of build-to-rent units to be delivered as ‘affordable private rent’ housing. Planning Practice Guidance²⁷ states that:

“The National Planning Policy Framework states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord.

20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. If local authorities wish to set a different proportion they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their local plan. Similarly, the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark.

National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The discount should be calculated when a discounted home is rented out, or when the tenancy is renewed. The rent on the discounted homes should increase on the same basis as rent increases for longer-term (market) tenancies within the development”

9.22 The Councils should have regard to the specific Planning Practice Guidance on Build-to-Rent development. At the current time the starting point should therefore be that 20% affordable private rented homes at a discount of 20% to local market rents should be included within a development scheme. The Councils should test the feasibility of this through viability analysis, but in order to help stimulate the market; Icenl does not consider that a higher proportion of affordable housing or higher discount should necessarily be applied. Our analysis of ‘living rents’ considered in Section 5 may help inform judgements regarding what rent levels are ‘affordable.’

²⁷ ID: 60-002-20180913

Build-to-Rent Development: Implications

Build to Rent development is currently a reasonably embryonic market outside of London. This is apparent in Central Lancashire, where no Build to Rent schemes have yet come forwards. However, the private rented sector has seen strong growth across all three authorities since 1991; and it is considered that it is now the second largest sector after owner-occupation.

It is therefore appropriate that the Councils consider the sector and craft planning policies which help to support it and provide clarity on how policies will be applied to it. Given the nature of the sector, the Councils are advised to align policy requirements to national guidance.

The Councils should develop a policy supporting Build to Rent development which specifies the types of locations which are considered suitable for such development, which we would consider to include being brought forward in the town centres and in particular Preston City Centre.

Self-Build and Custom-Build Development

- 9.23 The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) (“the 2015 Act”) provides a legal definition of ‘self-build and custom housebuilding’ which are where individuals or associations of individuals (or persons working with or for individuals or associations of individuals) build houses to be occupied as homes for those individuals.
- 9.24 The Government has long had a clear agenda for supporting and promoting the self-build and custom building sector. In *Laying the Foundations: a Housing Strategy for England* (November 2011), the Coalition Government set out plans to enable more people to build or commission their own home.
- 9.25 The Housing and Planning Act 2016 (“the 2016 Act”), which received Royal Assent on 12th May 2016, formally introduced the ‘Right to Build’ at Chapter 2. This 2016 Act under the ‘duty to grant planning permissions etc’ has placed a legal duty on the relevant authority to grant enough planning permissions to meet the demand for self-build housing as identified through its register in each base period. The Self-Build and Custom Housebuilding Regulations 2016 subsequently came into force on 31st October 2016, amending the 2015 Act and implementing Chapter 2 of the 2016 Act.
- 9.26 In the Government’s Housing White Paper²⁸ (paragraph 3.14) in January 2017, the commitment to support the self-build and custom housebuilding sector was reasserted, the Government stating that “*alongside smaller firms, the Government wants to support the growth of custom built homes*” in

²⁸ Fixing our Broken Housing Market (DCLG, February 2017)

recognition of the fact that custom build homes are generally built more quickly, built to a higher quality and tend to use more productive and modern methods of construction.

- 9.27 In addition, the Government highlighted that “*fewer homes are custom built in England than many other countries, but there is evidence of more demand for them including from older people*”. According to successive Ipsos MORI polls at the time of the Paper’s publication, more than a million people across the UK expected to buy a building plot, secure planning permission or start/complete construction work on their new home.
- 9.28 On the other side of the argument however, the Government (paragraph 3.15) did acknowledge that there are barriers to self-build and custom housebuilding, including access to finance – as “*mortgages for custom and self-built homes represent a very small proportion of the overall lending market*”; the planning process and variations to local authority approaches and crucially, land supply and procurement.

Central Lancashire Self-Build Registers

- 9.29 As of 1st April 2016 and in line with the 2015 Act and the Right to Build, relevant authorities in England are required to have established and publicised a self-build and custom housebuilding register which records those seeking to acquire serviced plots of land in the authority’s area in order to build their own self-build and custom houses. The individual authorities self-build and custom housebuilding register are free to join subject to fulfilling the eligibility criteria.
- 9.30 The Table below focusses on those who have expressed a preference for serviced plots of land in Chorley over the four base periods. In respect of the first base period, which is a level of need expected to be met through permissions by 30th October 2019 in accordance with the 2016 Act; there were 2 expressions of interest in a serviced plot.

Table 9.2 Serviced Plot Demand by Base Period in Chorley

	Total
Base Period 1 (1 st April 2016 to 30 th October 2016)	2
Base Period 2 (31 st October 2016 to 30 th October 2017)	6
Base Period 3 (31 st October 2017 to 30 th October 2018)	4
Base Period 4 (31 st October 2018 to 31 st May 2019)	2
Total	14

- 9.31 The Table below sets out the position for Preston over the four base periods. In respect of the first base period, there were 3 expressions of interest in a serviced plot; however, the expressions of interest have gradually increased over each base period.

Table 9.3 Serviced Plot Demand by Base Period in Preston

	Total
Base Period 1 (1 st April 2016 to 30 th October 2016)	3
Base Period 2 (31 st October 2016 to 30 th October 2017)	7
Base Period 3 (31 st October 2017 to 30 th October 2018)	7
Base Period 4 (31 st October 2018 to 31 st May 2019)	8
Total	25

9.32 The Table below sets out the position for South Ribble over the four base periods. In respect of the first base period, there were 2 expressions of interest in a serviced plot.

Table 9.4 Serviced Plot Demand by Base Period in South Ribble

	Total
Base Period 1 (1 st May 2016 to 30 th October 2016)	2
Base Period 2 (31 st October 2016 to 30 th October 2017)	5
Base Period 3 (31 st October 2017 to 30 th October 2018)	7
Base Period 4 (31 st October 2018 to 31 st May 2019)	8
Total	22

9.33 It is important to highlight that an Ipsos Mori poll²⁹ undertaken for NaCSBA in 2016 found that only one in eight people interested in self-build were aware of the introduction of Right to Build Registers in England. As a result, the number of expressions of interest on a local authority's self-build register may underestimate demand.

Broader Demand Evidence

9.34 In order to supplement the data from the Councils' own registers, we have looked to a number of secondary sources as recommended by the PPG including *the Buildstore* and the *National Custom and Self-Build Association* (NaCSBA).

9.35 Buildstore, who own and manage the largest national database relating to the demand and supply for self and custom build properties in the UK, have provided us with further evidence of demand. The Buildstore hold two databases which are helpful in understanding the level of demand including:

- The Buildstore Custom Build Register: this is the UK's longest running record of demand for self-build and custom build homes. It is marketed as a register that will be used to evidence

²⁹ 'Survey of Self Build Intentions 2016' – this survey questioned nearly 2,000 people about their self-build ambition and activity

demand for custom build across the UK and demonstrate the scale of need and types of homes those registered, would like to design and create for themselves and their families; and

- The Buildstore PlotSearch service: this is a free to subscribe PlotSearch service which records opportunities for those looking to find a serviced plot of land to build on.

9.36 Having consulted Buildstore directly, they have informed us that:

- 185 people are registered as looking to build in Chorley on their Custom Build Register with a further 699 subscribers to their Plotsearch service which tracks self-build land opportunities;
- 148 people are registered as looking to build in Preston on their Custom Build Register with a further 468 subscribers to their Plotsearch service which tracks self-build land opportunities; and
- 146 people are registered as looking to build in South Ribble on their Custom Build Register with a further 540 subscribers to their Plotsearch service which tracks self-build land opportunities.

9.37 This suggests there is a more sizeable level of demand for serviced plots for self-build and custom housebuilding across all three authorities which hasn't yet been reflected in the Councils' own self-build registers. This may in part reflect a level of aspiration rather than genuine need.

9.38 The National Custom and Self-Build Association (NaCSBA) has undertaken primary research with Ipsos Mori at a national level which indicate that 1 in 50 of the adult population³⁰ across the country want to purchase a Custom or Self-Build Home over the next 12 months.

9.39 If this is applied to the working population of Chorley³¹, Preston³² and South Ribble³³, this would point to a potential need in the order of:

- 1,929 serviced plots in Chorley;
- 2,292 serviced plots in Preston; and

³⁰ Those aged 15 or over; weighted to the known population profile

³¹ 96,462 persons aged 15 or over on the basis of the 2018 Mid-Year Population Estimates (ONS, June 2019)

³² 114,581 persons aged 15 or over on the basis of the 2018 Mid-Year Population Estimates (ONS, June 2019)

³³ 91,442 persons aged 15 or over on the basis of the 2018 Mid-Year Population Estimates (ONS, June 2019)

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- 1,829 serviced plots in South Ribble

9.40 Although research-based and the figures should therefore be treated with caution, this points towards a greater level of demand than the Councils' current self-build registers.

Supporting the Self-Build and Custom Housebuilding Sector

9.41 It is clear that there is a level of demand for self-build and custom housebuilding serviced plots of land in Central Lancashire. Over the last 4 base periods to date, there has been:

- A total of 14 expressions of interest in serviced plots of land in Chorley. There is also 185 people registered on the Buildstore's Custom Build Register and 699 subscribers to PlotSearch which points towards a higher level of demand in the area. Furthermore, NaCSBA research-based analysis points towards a need for 1,929 plots;
- A total of 25 expressions of interest in serviced plots of land in Preston. There is also 148 people registered on the Buildstore's Custom Build Register and 468 subscribers to PlotSearch which points towards a higher level of demand in the area. Furthermore, NaCSBA research-based analysis points towards a need for 2,292 plots; and
- A total of 22 expressions of interest in serviced plots of land in South Ribble. There is also 146 people registered on the Buildstore's Custom Build Register and 540 subscribers to PlotSearch which points towards a higher level of demand in the area. Furthermore, NaCSBA research-based analysis points towards a need for 1,829 plots.

9.42 The Self-Build and Custom Housebuilding PPG³⁴ sets out clearly that relevant authorities should consider how they can best support self-build and custom housebuilding in their area. There are a number of measures which can be used to support self-build and custom housebuilding in the authority areas, including:

- developing a planning policy which supports self-build and custom housebuilding;
- promoting and encouraging submissions of land which are suitable for self-build and custom housebuilding through the Call for Sites process;
- using local authority-owned land if available and suitable for self-build and custom housebuilding and marketing it to those on the register; and

³⁴ Paragraph: 025 Reference ID: 57-025-201760728

-
- working with custom build developers to maximise opportunities for self-build and custom housebuilding.

9.43 An increasing number of local planning authorities have adopted specific self-build and custom housebuilding policies to encourage delivery, promote and boost housing supply. These typically require that a minimum proportion of plots within development schemes (often over a certain size) are offered to self-builders or as custom-build plots and/or allocation of sites solely for the use. This is often known as the “Teignbridge Rule” after the first District Council to adopt the first self-build policy. In this instance, 5% of all developable housing land is allocated for custom and self-build on larger sites.

9.44 However, Icen consider that there is also potential for individual small sites to come forward to deliver self-build and custom housebuilding development whereby an outline application is presented together with a design code, with individual plots then coming forward through reserved matters consents.

9.45 In order to respond to demand in the sector, a specific planning policy should therefore be prepared to help better promote and encourage delivery of self-build and custom housebuilding which provides sufficient flexibility for serviced plots to be delivered as part of larger schemes as well providing support for smaller sites to deliver serviced plots directly.

9.46 Icen also consider that it may be appropriate to provide flexibility to allow for serviced plots to be introduced into the market for conventional housing – subject to affordable housing provision - should demand fail to materialise on-site after an extended period of time following marketing of the serviced plots.

Self-Build and Custom Housebuilding: Summary

Self-build and custom housebuilding is a growing sector of the housing market, and one which has potential to contribute to housing delivery. Since the introduction of the Councils self-build registers on 1st April 2016, there have been a total of:

- 14 expressions of interest in serviced plots of land in Chorley. There is also 146 people registered on the Buildstore’s Custom Build Register and 540 subscribers to PlotSearch; and NaCSBA research points towards a need for 1,929 plots;
- 25 expressions of interest in serviced plots of land in Preston. There is also 148 people registered on the Buildstore’s Custom Build Register and 468 subscribers to PlotSearch; and NaCSBA research points towards a need for 2,292 plots; and

-
- 22 expressions of interest in serviced plots of land in South Ribble. There is also 146 people registered on the Buildstore's Custom Build Register and 540 subscribers to PlotSearch; and NaCSBA research points towards a need for 1,829 plots.

The PPG sets out clearly that relevant authorities should consider how they can best support self-build and custom housebuilding in their area including developing policy and working with self-builders to maximise opportunities.

Accordingly, in recognition that there is demand in the three authority areas, a specific planning policy should be developed to help promote and encourage delivery of self-build and custom housebuilding. It is considered that schemes could come forwards on both small and larger sites; and the policy should be flexible to provide for opportunities as and when they arise.

10. CONCLUSIONS AND RECOMMENDATIONS

- 10.1 In this section, the team has sought to draw together a set of conclusions and recommendations drawing on the analysis in the preceding sections.

Local Housing Need and Distribution

- 10.2 The Government has implemented a standard method for assessing housing need which takes 2014-based Household Projections and applies an upward adjustment based on the median house price to earnings ratio.
- 10.3 The standard method results in a minimum local housing need for 1,026 dwellings per annum across the plan area. In line with the PPG, where strategic policies are being produced jointly, the housing need for the defined area should at least be the sum of the local housing need for each local planning authority; and it is then for the authorities to distribute the need across the plan area.
- 10.4 For the purposes of establishing a housing requirement for five year land supply purposes, the PPG specifically directs that the standard method should be used.

R1: For assessing five year housing land supply pending the adoption of a new Joint Local Plan, the Councils should use the standard method to calculate the minimum housing requirement for Central Lancashire. At the time of writing, this is a figure of 1,026 dpa.

- 10.5 The PPG does set out in Para 2a-010 circumstances in which it might be appropriate to plan for higher levels of housing provision than the minimum figures generated by the standard method. As the plan-making process progresses, the authorities will need to take account of future data releases and evidence, and engage on what level of housing provision should be planned for in Central Lancashire. In bringing together evidence through the plan-making process, the authorities recognise that they will need to further consider whether higher housing provision than the standard method should be made to support the economy, infrastructure delivery or affordable housing in accordance with the PPG.
- 10.6 These are however, considerations for the plan-making process, not decision-making. For decision making, the PPG on Housing Supply and Delivery is clear that five year housing land supply should be assessed against the standard method.

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- 10.7 This report has sought to work through a logical approach to arrive at a recommended distribution of housing need for the three authority areas in Central Lancashire with due regard to the existing population, jobs and workforce profile of each authority; as well as the existing spatial strategy, a nominal urban capacity figure for each authority and the proportion of nationally significant constraints.
- 10.8 The Table below brings all our analysis on these variables together to arrive at a recommended distribution; which can then be applied to the total local housing need figure for the plan area of 1,026 homes per annum.

Table 10.1 Recommended Interim Distribution of Housing Provision

Variable	CBC	PCC	SRBC
Jobs Distribution	22%	48%	30%
Population Distribution	32%	38%	30%
Affordability Distribution	36%	28%	36%
Affordable Housing Need Distribution	22%	42%	35%
Workforce Distribution	32%	38%	30%
Nominal Urban Capacity	18%	42%	40%
Existing Spatial Strategy	30%	40%	30%
Land not Subject to National Constraints	20%	86%	33%
Recommended Distribution (%)	27.5%	40%	32.5%
Plan Area Local Housing Need (p.a.)	1,026		
Distributed Local Housing Need (p.a.)	282	410	334

- 10.9 IcenI has worked with the Councils to appraise the appropriate distribution, and has considered responses from the MoU consultation (which took place between 4th to 15th November 2019 and 9th Dec 2019 until 13th Jan 2020) received on these issues. It is intended that the distribution should recognise the need to maximise urban capacity; locate homes close to jobs in order to build a strong and responsive economy; and respond to the extent of nationally significant constraints in Chorley and South Ribble.

R2: The Councils should adopt a distribution of housing needs which reflects a percentage split of 27.5% for Chorley, 40% for Preston and 32.5% for South Ribble based on a range of variables which support sustainable patterns of development.

- 10.10 This results in a housing requirement for 282 homes per annum in Chorley, 410 homes per annum in Preston and 334 homes per annum in South Ribble based on the current 'standard method' calculations at HMA level. This is anticipated to be taken through and agreed in the updated

Memorandum of Understanding between the three authorities. This is intended to provide an interim basis for agreeing how the HMA's housing needs might be distributed.

10.11 It will be necessary to review this as the plan-making process progresses to take account of further evidence including related to land availability, development constraints, infrastructure and the testing of options for the distribution of housing through the Integrated Appraisal process. Iceni consider that robust strategic planning should be undertaken on a 'boundary blind' basis with potential strategic spatial options developed and tested for Central Lancashire as a whole.

10.12 The level and distribution of housing within an MOU may also require review and updating to take account of new evidence or changes in national policy/guidance, such as a review of the standard method which Government has indicated it may undertake in due course.

Affordable Housing

10.13 The report includes an updated assessment of affordable housing need which responds to the widened definition of affordable housing set out in the 2019 NPPF. This includes households who might be able to rent a home in the private sector without financial support but aspire to own a home and require support to do so.

10.14 The assessment shows an annual need for 590 rented affordable homes across Central Lancashire which is consistent – albeit marginally lower - with the 2017 SHMA which also demonstrates a substantial need for affordable housing. The Table below provides a breakdown of the need by authority.

Table 10.2 Annual Net Need for Affordable Housing in Central Lancashire

2018-36	Chorley	Preston	South Ribble	C Lancs
Net Need for Rented Affordable	132	250	208	590

10.15 The report has also assessed the potential scale of need for affordable home ownership housing, identifying that there is not a net need for additional affordable home ownership homes.

10.16 In bringing together evidence through the new Local Plan, the Councils need to consider the evidence of need, the relative acuteness of the need, and issues of residential development viability. The NPPF advises that at least 10% of all new housing on large sites of 10 or more homes should be for affordable home ownership unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

-
- 10.17 The evidence in this report suggests it would be reasonable to conclude that there is no need to provide significant quantities of housing under the new definition of 'affordable home ownership'. This said, it is important to recognise that some households will have insufficient savings to be able to afford to buy a home on the open market (in terms of the ability to afford both a deposit and stamp duty) and low cost home ownership homes - and shared ownership homes in particular - will therefore continue to play a role in supporting some households in this respect.
- 10.18 Conversely, there is a clear and acute need for affordable rented housing, the Councils should look to seek as much rented affordable products as possible. The analysis identifies that between 29% and 33% of the group of households unable to afford market housing to rent fall in the gap between the market and 80% of the market depending on location. It is therefore suggested that a target of 30% of all rented affordable housing as affordable rents would be reasonable (and therefore 70% to be social rents).

R3: A clear need for affordable housing is shown and Icen consider that the Councils are fully justified in seeking affordable housing through new development schemes. The new Local Plan should include policies advising on the proportion of affordable housing sought through new development taking account of the housing needs as well as viability evidence.

In negotiating affordable housing on individual schemes, the Councils should have regard to this report; as well as the profile of need at the local level at the time of considering a planning application and where applicable, the viability of the development scheme.

R4: In setting policies on affordable housing, the Councils are advised to bring together evidence of need within this report with consideration of how they wish to prioritise the delivery of different types of affordable housing and evidence/testing of residential development viability. The evidence in this report would suggest the provision of rented affordable housing should be prioritised and therefore Icen consider that 10% low-cost home ownership housing (at 10%) through policy would not be justified. In recognition of the significant need for rented affordable accommodation, the Councils should look to seek as much rented affordable products as possible subject to viability. However, it should be noted that there may be circumstances where shared ownership is appropriate i.e. where the requirement for a deposit is lower.

R5: Icen recommend that given the there is a clear and acute need for affordable rented housing from lower income households, a target of 30% of all rented affordable housing should be for affordable rents 70% should be for social rents. This is supported by the analysis in this report.

R6: Icení recommend that affordable home ownership homes are priced to be affordable to households who cannot afford lower quartile house prices. Note that Table 5.12 in this report provides guidance of how homes of different sizes should be priced based on current evidence.

Older Persons Housing Needs

- 10.19 The analysis in this report has shown a notable growth in the population of older persons aged 65+ in Central Lancashire over the period to 2036. Within this, the number of people with a range of disabilities is projected to increase by 9,393 across the plan area. The specific projections undertaken include an expected increase of those with dementia by 2,712 and with mobility problems by 6,251 to 2036.
- 10.20 Many older households will continue to live in mainstream housing but given the substantial growth in the population of older persons and associated increases in those with a disability, it is appropriate for new housing to be delivered to meet Part M4(2) accessible and adaptable home standards, subject to viability testing and site suitability.

R7: The Councils should develop planning policy which requires a third of new homes to be delivered to the Part M4(2) standards as set out in Building Regulations where this is feasible and appropriate on-site.

- 10.21 Some older households, particularly those aged over 75, will require specialist housing provision. The analysis in this section points to a need for 3,076 units of housing with support to 2036, and 1,897 units of housing with care across the plan. In considering extra-care schemes, there is a need to carefully consider the viability and practical feasibility of delivering affordable housing on-site.

Table 10.3 Need for Specialist Older Persons Housing in Central Lancashire

2018-36	Rented	Leasehold	Total
Housing with Support	-160	3,236	3,076
Housing with Care	864	1,033	1,897

- 10.22 The analysis also identifies a need for 573 care home bedspaces in Central Lancashire to 2036. These will fall within a C2 use class.
- 10.23 It is important that the councils' planning policies support the delivery of specialist housing and care home bedspaces. Doing so will help to release existing mainstream housing, including family housing, for other groups within the population. Particular barriers to delivery include access to land, and the viability of provision which can differ from mainstream housing

R8: The Councils should consider making specific allocations of land for older persons housing and care home bedspaces, given that developers of specialist housing can in some instances struggle to secure sites against mainstream market housing developers.

R9: The Councils should carefully consider the economics of delivery of different types of older persons housing through the preparation of viability evidence and consider whether a differential affordable housing policy should be applied to different types of specialist housing schemes. In particular, for schemes with higher levels of care provision and significant communal facilities, consideration should also be given to whether it is practical to manage market and affordable provision within a single development. This may be influenced by the nature of the site and scheme.

10.24 In addition, a need for 1,085 dwellings from wheelchair users in the plan area, equivalent to 6% of the total housing need. Icenis consider that it would be appropriate to seek provision as part of major new-build schemes, subject to support from viability evidence studies and evaluation on a site-by-site basis.

R10: Planning policies should require 5% of dwellings on major development schemes (i.e. 10 homes or more) to be delivered to wheelchair adaptable standards. This should be reviewed on a site-by-site basis.

Needs for Different Sizes of Homes

10.25 Understanding the existing housing mix in the plan area is important in considering what future mix of housing is appropriate to deliver a mixed and balanced community. This is important at both a strategic, and at a local, level.

10.26 The analysis in this report shows that the profile of housing in Central Lancashire looks to be fairly balanced in comparison with other areas (i.e. there is not obvious over or under supply of particular sizes of homes relative to other locations) although there are some differences across locations (the profile of the private rented sector in Preston being the most notable).

10.27 Taking into account the current housing stock and expected demographic trends – including the expectation that some older households will downsize if the right properties are available), this report points towards a need for different sizes of homes in the market and affordable sectors which are reflected in the Table below.

Table 10.4 Recommended Housing Mix, Central Lancashire

	Affordable Rented	Affordable Home Ownership	Market Housing
1 Bed	40%	20%	5%
2 Bedrooms	30%	40%	35%
3 Bedrooms	20%	30%	45%
4+ Bedrooms	10%	10%	15%

R11: Iceni recommend that this Table informs negotiations regarding the mix of housing to be delivered on individual development sites alongside consideration of the existing housing mix in the settlement and gaps in the housing offer, the development pipeline and where appropriate evidence of the profile of households on the Housing Register in an area on needs shown through local survey evidence. Consideration should also be given to the location and nature of the development site.

- 10.28 The recommendations can also be used as a set of guidelines to consider the appropriate mix on larger development sites, and Iceni consider that it would be reasonable to expect justification for a housing mix on such sites which significantly differs from that modelled herein.

Build to Rent Development

- 10.29 Build to Rent development is currently a relatively embryonic market outside of London. This is apparent in Central Lancashire, where no Build to Rent schemes have yet tested the market. However, the private rented sector has seen strong growth across all three authorities since 1991; and recent data suggests that it is now the second largest sector in the HMA.
- 10.30 It is therefore appropriate that the Councils consider the sector and craft planning policies which help to support it and provide clarity on how policies will be applied to it. The Councils should develop a policy supporting Build to Rent development which specifies the types of locations which are considered suitable for such development, which we would consider to include schemes being brought forward in the town centres, particularly in Preston City Centre.
- 10.31 Iceni consider that given the embryonic nature of the sector, the councils would be advised to align policy requirements with national guidance. Current rental levels are probably insufficient to support significant levels of build-to-rent development.

R12: The Councils should develop a policy supporting Build to Rent development. This should specify the types of locations which are considered suitable for such development, which we would consider to include strategic sites in town centres.

R13: The Councils should, subject to viability testing, include a clear policy on the level of affordable housing provision to be sought within Build-to-Rent schemes. Iceni consider that this should require 20% of units to be delivered as affordable private rented housing at a 20% discount to market rents (inclusive of service charge) in line with the PPG subject to viability.

Self-Build and Custom Housebuilding

10.32 Self- and custom-build development is also a growing sector of the housing market, and one which has potential to contribute to housing delivery. Following the introduction of the Councils self-build registers on 1st April 2016, there have been a total of:

- 14 expressions of interest in serviced plots of land in Chorley. There is also 185 people registered on the Buildstore's Custom Build Register and 699 subscribers to PlotSearch; and NaCSBA research points towards a need for 1,929 plots;
- 25 expressions of interest in serviced plots of land in Preston. There is also 148 people registered on the Buildstore's Custom Build Register and 468 subscribers to PlotSearch; and NaCSBA research points towards a need for 2,292 plots; and
- 22 expressions of interest in serviced plots of land in South Ribble. There is also 146 people registered on the Buildstore's Custom Build Register and 540 subscribers to PlotSearch; and NaCSBA research points towards a need for 1,829 plots

10.33 The PPG³⁵ sets out clearly that relevant authorities should consider how they can best support self-build and custom housebuilding in their area including developing policy and working with self-builders to maximise opportunities.

10.34 Accordingly, in recognition of the level of demand in the study area, a specific planning policy should be developed to help promote and encourage delivery of self-build and custom housebuilding. It is considered that schemes could come forwards on both small and larger sites in each authority area; and the policy should be flexible to provide for opportunities as and when they arise.

R14: The Councils should develop a flexible approach to supporting the self-build and custom housebuilding sector on both small sites, and larger strategic sites within the authority areas.

³⁵ Paragraph: 025 Reference ID: 57-025-201760728

A1. PROJECTED CHANGE IN HOUSEHOLD TYPES

Chorley

	2018	2036	Change	% Change
One-person household (aged 65 and over)	6,333	8,333	2,000	31.6%
One-person household (aged under 65)	7,816	8,141	324	4.2%
Couple (aged 65 and over)	6,888	10,552	3,663	53.2%
Couple (aged under 65)	7,738	6,253	-1,485	-19.2%
A couple and one or more other adults: No dependent children	3,677	3,487	-190	-5.2%
Households with one dependent child	7,262	7,703	441	6.1%
Households with two dependent children	5,766	5,788	22	0.4%
Households with three dependent children	1,757	1,463	-294	-16.7%
Other households	2,570	3,017	447	17.4%
TOTAL	49,807	54,736	4,929	9.9%
Total households with dependent children	14,785	14,955	170	1.1%

Preston

	2018	2036	Change	% Change
One-person household (aged 65 and over)	6,922	8,444	1,522	22.0%
One-person household (aged under 65)	14,042	17,232	3,189	22.7%
Couple (aged 65 and over)	5,217	7,267	2,050	39.3%
Couple (aged under 65)	6,811	5,025	-1,786	-26.2%
A couple and one or more other adults: No dependent children	4,296	4,434	139	3.2%
Households with one dependent child	7,896	8,919	1,023	13.0%
Households with two dependent children	5,875	5,884	9	0.2%
Households with three dependent children	3,188	3,426	238	7.5%
Other households	4,539	5,319	780	17.2%
TOTAL	58,786	65,951	7,165	12.2%
Total households with dependent children	16,959	18,229	1,270	7.5%

South Ribble

	2018	2036	Change	% Change
One-person household (aged 65 and over)	6,317	7,418	1,101	17.4%
One-person household (aged under 65)	6,475	6,644	169	2.6%
Couple (aged 65 and over)	7,087	10,561	3,474	49.0%
Couple (aged under 65)	7,114	5,911	-1,203	-16.9%
A couple and one or more other adults: No dependent children	4,075	4,186	110	2.7%
Households with one dependent child	7,127	8,746	1,619	22.7%
Households with two dependent children	4,998	5,172	174	3.5%
Households with three dependent children	1,651	1,471	-180	-10.9%
Other households	2,851	3,423	572	20.1%
TOTAL	47,695	53,532	5,837	12.2%
Total households with dependent children	13,776	15,389	1,613	11.7%

APPENDIX 22:

Expression of Interest email from Heylo

Re: Garstang Road, Broughton, Preston

Rupert Mackay <rmackay@heylohousing.com>

Thu 2023-09-28 7:31 PM

To:Christian Orr <christian.orr@hsland.co.uk>

CAUTION:EXTERNAL EMAIL!

Christian,

Please accept this e mail as confirmation that Heylo Housing are indeed interested in acquiring the affordable homes on your proposed Garstang Road Preston site.

Regards

Rupert



Rupert Mackay | Acquisitions Director

 [07713 784512](tel:07713784512)

 [DDI. 020 3744 0345](tel:02037440345)

 heylohousing.com

 [Level 6, Design Centre East, Chelsea Harbour, London, SW10 0XF](#)



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APPENDIX 23:

Expression of Interest letter from Liberty Living



Liberty
Living
Partnership

Honeycomb West
Chester Business Park
Chester
CH4 9QH
Tel: 01244 351306

Christian Orr

Land & Planning Director

By email: christian.orr@hsland.co.uk

Dear Christian,

RE: Hollins Site, Garstang Road, Broughton, PR3 5JB

Having recently assessed local market demand and need data we have identified your site off Garstang Road, Broughton. We believe it possess great potential for a mixed tenure development comprising both housing and an apartment led development designed to facilitate independent living of the 55+ age demographic. Therefore, I write to express our keen interest to acquire the site should your appeal be successful.

Your Partner

By way of introduction, Liberty Living is part of the wider group of companies of Liberty Properties, a highly successful privately owned and family run business that over the past 35+ years has amassed experience in developing residential; retirement; extra care; and residential care home sectors.

Liberty Living was coined as a direct response to the chronic under provision of affordable tenures in both family housing and senior living tenures in the North West and Midlands regions. The group of companies possess a truly all-encompassing offer to deliver family housing, retirement and care developments, and neighbourhood centres. This enables us to maximise land receipts for our landowner and JV partners and achieve planning permissions more expediently via acting as one development partner.

Case for Our Development

Lancashire County Council recently published it's Housing with Care and Support Strategy 2018-2025. It summarised the following key facts in support of delivering between 1,000-2,117 extra care or supported units for older people:

- There is significant need for new modern apartment or housing led developments to facilitate independent living as there are only two purposes built extra care schemes located in Ormskirk and Whitworth, with three schemes under development in Chroley, Preston, and Wyre.
- In March 2019, LCC was supporting 3,285 older adults in long-term residential care at an average gross weekly cost of £540 per person, and 1,111 older adults in nursing care at an average gross weekly cost of £641 per person.
- In 2017/18, the number of council-supported long-term admissions of older adults to residential or nursing care homes per 100,000 population was 729 in Lancashire – higher than both the shire counties average of 557 and the England average of 586.

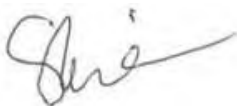
- Predicted changes to the older adults (aged 65 or over) population of Lancashire by 2025 (from 2017):
 - 34,300 or 14% increase in the number of older adults
 - 20,649 or 25% increase in the number of people with dementia
 - 21,502 or 17% increase in the number of people with a limiting long-term illness
 - 16,365 or 19% increase in the number of people living alone.
- It outlined the older person housing need could be distributed between the following district local authorities in the following fashion:

District	Estimated no. of units needed	No. of units in existence or development
Burnley	134	0
Chorley	206	65
Fylde	194	0
Hyndburn	123	0
Lancaster	238	0
Pendle	138	0
Preston	165	60
Ribble Valley	125	0
Rosendale	107	42
South Ribble	204	0
West Lancashire	217	111
Wyre	265	72
Total	2,117	350

Therefore, based on the above we would anticipate our proposals would be welcomed in principal but subject to design and technical details.

Please do keep us informed of the outcome of the appeal and I wish you well in your endeavours.

Yours sincerely,



Sam Oliver
 Managing Director
 sam@libertyprops.com | 07793540366 | 01244 351 306

APPENDIX 24:

Updated BNG Report (ERAP) *TO FOLLOW

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

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