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Preferred Options Consultation,
Central Lancashire Local Plan Team,
Civic Offices,
Union Street,
Chorley
PR7 1AL

Submitted via email to: CentralLancashirePlan@chorley.gov.uk

Dear Local Plan Team

Central Lancashire Local Plan – Publication Draft (Regulation 19) Consultation

Response by MPSL Planning & Design on behalf of The Cooper Family

This letter has been prepared by MPSL Planning & Design on behalf of The Cooper Family, who welcome the opportunity to comment on the Publication Draft version of the Central Lancashire Local Plan Publication Draft ('CLLP').

Alongside providing comments on the CLLP, in particular the approach to delivering the housing that Central Lancashire needs, the focus of this response relates to the promotion of **Land at Toy Farm, Euxton ('The Site')** for release from the Green Belt for residential development. The Site has previously been submitted as part of Call for Sites 4. A Development Statement (December 2022) has previously been submitted to Chorley Council informally. The Development Statement is attached as Appendix 1 to this consultation response for reference.

Background

As outlined above, MPSL Planning & Design Ltd have previously submitted the appended Development Statement to Chorley Council and it outlines the land being promoted, which extends to approximately 32 hectares in two distinct parcels either side of Southport Road to the immediate east of Euxton, within Chorley Borough's administrative area. It is considered that the land has the potential to deliver around 600 homes in a series of phases.

The Statement confirms that the site is available, suitable, achievable, and therefore a deliverable site, appropriate to be released from the Green Belt and allocated for residential development. The Site will make an important contribution towards meeting the future housing needs of Chorley.

Site Characteristics

The site is particularly sustainably located, between the urban areas of Euxton and Chorley. The site is divided by the A581 (Southport Road) into two distinct parcels of land which combine to cover approximately 32ha of land in single ownership, which is predominantly greenfield and in agricultural use.

The southern parcel of land spans approximately 25 hectares of land that comprises primarily of agricultural land. There are also large clusters of trees towards the south. The southern boundary of the southern parcel follows the River Yarrow. Immediately to the west of the northern boundary is Euxton Cricket Club and the Euxton Skate Park. The southern parcel is also comprised of two parcels of land that exhibit different characteristics (See Figure 2 in the Development Statement). Area 1 is rectangular and is heavily influenced by the existing settlement of Euxton, with the homes along Bredon Avenue (north) and Hawkshead Avenue (west) framing the land. The southern and eastern boundaries are lined by dense vegetation and trees which have the effect of enclosure. Area 2 is more expansive, and the levels change considerably towards the southern end, down towards the River Yarrow. The eastern boundary is characterised by dense woodland which forms a clear visual barrier between the settlements of Euxton and Chorley.

The northern parcel of land is the smaller of the two and spans approximately 7 hectares and again comprises primarily of agricultural land. The dense woodland continues to run alongside the eastern boundary helping to create physical and visual separation from Chorley. In the centre of the northern parcel of land is Toy Farm itself and the premises of Lancashire Waste Services. These buildings effectively split the northern parcel in two. Area 3 to the south is bounded by Southport Road (south) and Washington Lane (west) and is heavily influenced by the urban fringe of Euxton. There are limited features in the parcel of land itself and some residential properties along Washington Lane back on to the western boundary. Area 4 lies to the north of Toy Farm and again is heavily influenced by the built environment, not only the residential properties in Euxton to the west, but also by the commercial buildings to the east, including Chorley Fire Station, the Forge Logistics warehouse and the coach depot.

It is worth noting that Section 4 of the Development Statement contains our own Green Belt Assessment of the site itself. The LUC Green Belt Designation Study situates the site within two wider parcels of land (P21 and P22) which is too high level to be able to consider the site's specific contribution to the Green Belt. It is acknowledged that this land forms a key Area of Separation between the settlements of Euxton and Chorley and the assessment has considered each parcel in its entirety. It is evident that certain elements of the LUC GBDS would have a different outcome if individual elements of the Toy Farm land had been considered in isolation. Through a carefully masterplanned approach, it is possible to maintain the integrity and function of the Green Belt and Area of Separation that exists such that this land can be considered appropriate for Green Belt release with a new durable Green Belt boundary then being established.

Consultation Response and Format

Our response is set out amongst the following categories:

- **Policy and Strategic Growth Context.** We begin our response by considering the wider policy and strategy objectives that provide the context within which the CLLP sits. The CLLP has an important role to play in helping not just Central Lancashire thrive, but Lancashire as a whole.
- **Response to individual CLLP Policies.** We then go on to respond to specific policies contained within the CLLP, with a particular focus on those related to meeting Central Lancashire's housing needs.

Policy and Strategic Growth Context

The national Government is dedicated to stimulating economic growth by reforming the planning system to boost housing development and support major infrastructure projects.

The Written Ministerial Statement from Angela Raynor dated 30th July 2024 entitled 'Building the Homes we need' highlights that all local authorities should ensure that they have a development plan in place and that plans at an advanced stage of preparation, i.e. Regulation 19 (such as the CLLP) should be submitted for Examination but where a significant gap exists between the plan and the new local housing needs figure exists, this should be taken in to account. Whilst the CLLP is being prepared under the transitional arrangements, the national impetus to ensure that 1.5 million new homes are delivered within the current Parliament is a factor that should encourage the Central Lancashire authorities to prepare an ambitious Local Plan. Sadly, this is not the case.

Added to this national agenda, is the regional momentum that is building for regional growth through investment devolution and reform, as well as enhanced support for businesses via a 10-year Industrial Strategy aimed at driving innovation and investment in new technology and science, positioning Britain as a clean energy superpower.

Locally, the Lancashire region boasts the second-largest economy in the North West, with a population of over 1.5 million people and a Gross Value Added (GVA) of £40 billion. The region excels in advanced engineering and manufacturing, nuclear energy, cybersecurity, artificial intelligence, and sustainable industries.

The devolution deal for the Lancashire Combined County Authority, initiated by Lancashire County Council and the unitary councils of Blackpool and Blackburn with Darwen, focuses on economic regeneration, innovation-led growth, and net zero ambitions. Central government has provided £20 million in funding to support projects aligned with these goals, including the Samlesbury Enterprise Zone, Blackpool Enterprise Zone, and the Innovation Quarter in Blackburn.

In February 2025, the Lancashire Growth Plan (2025-2035) was published by the Combined County Authority (CCA) for public consultation. The plan aims to drive innovation and economic growth across the region, outlining priorities to transform Lancashire into a global leader in innovation, inward investment, and economic resilience. These priorities include:

- Sector Development & Growth: Realizing the full potential of Lancashire’s competitive economic strengths and business base.
- Innovation Excellence: Maximizing the economic value of Lancashire’s research and innovation centres and globally competitive business clusters.
- Skills for Growth: Refocusing Lancashire’s approach to skills provision to meet business needs and enable inclusive growth.
- Business Growth & Enterprise: Strengthening and refreshing Lancashire’s business growth hub (Boost) in targeted areas and improving strategic capacity to attract new investors and occupiers.
- Releasing Local Growth Potential: Creating the right conditions for business and investor growth and unlocking new development and employment opportunities through the development of a Lancashire Infrastructure Strategy and related plans.

All of these economic initiatives are rightly ambitious given the scale and future potential of the Lancashire economy and so marrying up this ambition with a CLLP that advocates housing growth, seeking to meet currently identified housing needs (as per the standard method) should be a bare minimum.

Unfortunately this ‘bare minimum’ baseline is not going to be achieved within the CLLP and so we now respond to this shortcoming in the context of the individual policies contained within the plan that relate to housing delivery.

Response to individual CLLP Policies

Vision and Strategic Objectives

We are generally supportive of the proposed Spatial Vision for Central Lancashire for the plan period. The vision opens with the ambitions for the economy in 2041, and focuses on economic growth and other aspects of development e.g. climate change, inequality and infrastructure. Homes are only mentioned once in the spatial vision despite high quality homes being essential to economic growth and achieving sustainable development.

The vision should clearly recognise the importance of planning for new homes to support economic growth, existing shops, services and communities. Well planned, high quality, residential development will also be able to support other aspects of the Vision.

Strategic Objective 2 – Sustainable Patterns of Development

We strongly support the Central Lancashire authorities commitment to focus development at accessible and sustainable locations, making the best use of existing land, infrastructure, facilities and services. The Land at Toy Farm is located adjacent to the urban area of both Chorley and Euxton, which are both very accessible and sustainable locations. Section 5 in the accompanying Development Statement outlines the site’s excellent access in relation to Schools, Shops & Services,

Employment, Public Transport, Healthcare, Walking & Cycling links and Sports, Recreation & Community Uses in both Euxton and Chorley.

Strategic Objective 3: Sustainable Communities

We support Objective 3 seeking to provide a scale and mix of housing types and sizes in a range of locations to deliver economic growth aspirations and local housing needs. However, our concern is that this is then not followed through within Policy HS1 which establishes the housing requirement for Chorley as being 334 dwellings per annum (dpa).

Putting aside the fact that the CLLP is being submitted under the transitional requirements (by choice, not necessity), the current standard method housing figure for Chorley is 564 dpa, which represents a 230 dwelling shortfall per annum. This in itself would represent a shortfall of 4,140 dwellings over the proposed 18 year plan period.

The CLLP Strategic Objective to meet 'local housing needs' is therefore not achieved by virtue of the strategy that has been adopted in respect of housing delivery under Policy HS1.

Policy SS2: Settlement Hierarchy

We generally support the Tiers that have been identified in the Settlement Network and Hierarchy for Central Lancashire. It is our view that the site lies within a Urban Local Service Centre (Tier 3) location, i.e. adjacent to Euxton urban area, where moderate growth and investment is planned to be directed towards. The site is also close enough to be considered functionally linked to the main Chorley urban area as a wide range of services and facilities are available within an accessible distance from the site in Chorley.

It is also our view that insufficient land has been allocated within Chorley borough to meet its housing needs and a disproportionate amount of housing growth is directed towards Preston. Therefore, the Land at Toy Farm should be considered for release from the Green Belt as this represents an approach consistent with the fundamental objectives of recent changes to national planning policy brought about in the update to the National Planning Policy Framework (NPPF) in December 2024.

Policy HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements

Paragraph 4.5 outlines that the Central Lancashire Authorities are pursuing the employment-led housing need scenario equating to 1,314 dpa (334dpa in Chorley, 460dpa in South Ribble and 520dpa in Preston). The CLLP has been prepared in accordance with the transitional arrangements set out at paragraph 234(a) of the NPPF and so this figure equates to 80% of local housing needs (as calculated by the current standard method). This is a major shortcoming and completely undermines the ambitious economic growth strategies being pursued across Lancashire.

If the CLLP was to be prepared in accordance with the current standard method, this identifies a local housing need for Chorley of 564dpa, for Preston of 590dpa and for South Ribble of 489dpa, which would equate to an overall housing requirement of 1,643dpa. This is a shortfall of 329 dpa

or 5,922 dwellings over the plan under the minimum required to meet currently identified local housing needs. Of this 329 dpa shortfall, 230 dpa is attributable to the shortfall in housing needs identified in Chorley. Combined, South Ribble and Preston make up just 99 dpa of this shortfall and so this demonstrates that a disproportionate approach is being taken in respect of the housing distribution across the three districts, with more needed to be redistributed towards Chorley.

Paragraphs 4.11 to 4.21 in the supporting text attempt to explain why the housing requirement is proposed to be redistributed away from Chorley, however in our view this provides further evidence as to why more land should be allocated in Chorley and land released from the Green Belt to meet local housing needs that are known to exist and thereby reduce the commuting to other areas that will inevitably occur. The updates to calculating housing needs through the standard method are directly linked to existing housing stock and affordability criteria and this is calculated on a District by District basis. Chorley has its own distinct housing market and so any needs arising through the standard method figure are directly linked to Chorley itself and should not be met in Preston, which is over 11 miles away. It cannot therefore be said that the housing needs of Chorley residents are being met.

We are of the view that Green Belt release is required in order for Chorley to meet a higher proportion of its own housing needs (rather than redirecting these to Preston in particular) and to meet, as a minimum, the standard method requirement of 564 dpa. This would also include the need to identify areas of safeguarded land in order that future housing needs can be met when carrying out future Local Plan reviews without the need to release additional land from the Green Belt to do so, in line with the requirements of Section 13 of the NPPF.

Policy HS7: Affordable Housing

When considering where to distribute housing and the overall requirement it is important to not only ensure that the basic quantitative needs are met but that needs arising for specialist or affordable housing are also met.

The Chorley Housing Needs and Demand Assessment (HNDA) was prepared in 2024 and DNA identified an annual need for 162 affordable homes, with a tenure split of 71% rented and 29% affordable home ownership. Based upon the policy requirement of 30% affordable housing in Tiers 1, 2 and 3 (where developments of scale will occur) and the housing requirement of 334 dpa, on the assumption that all sites deliver a policy compliant level of affordable housing just 100 affordable homes will be delivered each year. This is an annual shortfall of 62 affordable homes, which equates to 1,116 affordable homes over the plan period. This of course does not take in to account viability issues which could impact upon the level of affordable housing being delivered on a site by site basis.

The suppressed housing figure for Chorley will therefore fail to deliver the required level of affordable housing for those who are in most need and this shortcoming can only be addressed by adopting the current standard method figure for Chorley as the housing requirement. Using the 564 figure a policy compliant 30% affordable housing delivery rate would equate to 169 affordable homes per annum and so this aligns with the needs that have been identified in the

Chorley HDNA. It is clear therefore that the standard method figure of 564 dpa for Chorley is a wholly appropriate starting point.

Conclusion

Given that the latest (2023) Housing Delivery Test measurement for Chorley is 57% (and so the Presumption at NPPF paragraph 11 applies) and the Council have been unable to demonstrate a deliverable five year housing land supply in recent years (2.9 years is the latest calculation) and have lost planning appeals on this basis, it is considered that additional land should be released from the Green Belt to meet housing needs.

Sufficient safeguarded land identified should also be identified within the Borough as part of the Local Plan Review to ensure that Green Belt boundaries are durable beyond the current plan period and to avoid unplanned development, as has been the case recently.

The Land at Toy Farm site is available, suitable, achievable, and therefore a deliverable site, appropriate to be released from the Green Belt and allocated for residential development or at the very least, safeguarded for future housing development. The Site will make an important contribution towards meeting the future housing needs of Chorley and the accompanying Development Statement outlines the land being promoted, which extends to approximately 32 hectares in two distinct parcels either side of Southport Road to the immediate east of Euxton, within Chorley Borough's administrative area. It is considered that the land has the potential to deliver around 600 homes in a series of phases.

Through careful masterplanning, it is possible to retain a distinct 'Area of separation' between Euxton and Chorley and retain the valuable purposes that the green belt performs in this area whilst meeting housing needs in a very sustainable location in accordance with the spatial strategy. There are no known high level material constraints preventing the land being brought forward for residential development, the site is within single landownership and can contribute towards meeting Chorley's housing needs within the first five years of the Plan period if required.

Yours sincerely,

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Appendix 1

Development Statement – Land at Toy Farm, Euxton