

# Central Lancashire Local Plan 2023-2041

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)  
(ENGLAND) REGULATIONS 2012



## Regulation 19 Pre-Submission Plan

### REPRESENTATION FORM

The easiest way to submit your comments is online at <https://centrallocalplan.citizenspace.com/planning/cllp-regulation-19-representation-period/> . Alternatively, you can scan the QR code on the right, using a smartphone, to be taken to the webpage. **We would encourage you to use the online form wherever possible.** Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



#### Submission form

This form has two parts-

**Part A** – Personal Details: need only to be completed once. **We will not be able to accept responses where personal details are not provided.**

**Part B** – Your representation(s): Please fill in a separate sheet for each representation you wish to make relating to each individual policy.

You will be asked to give details of why you consider the policies of the Local Plan to be sound or unsound, please be as precise as possible. You will also be asked to set out the modification(s) you consider necessary to make the Local Plan policies sound in respect of any soundness matters you have identified. You will need to say why each modification will make the policy sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### Privacy Notice

If you have any questions about how the Central Lancashire Authorities will handle your personal data, please see our Data Protection Policy Statement or contact us via email at [centrallancashireplan@chorley.gov.uk](mailto:centrallancashireplan@chorley.gov.uk)

- Chorley Privacy Statement: <https://chorley.gov.uk/privacy>
- Preston Privacy Statement: <https://www.preston.gov.uk/article/1231/Data-protection-policy-statement>
- South Ribble Privacy Statement: <https://southribble.gov.uk/privacypolicy>

**Part A: Personal Details\***

We will not be able to accept responses where personal details are not provided.

1. Please provide your contact details.

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) in the Person Details boxes below but complete the full contact details of the agent in Agent Details.*

	Representor Personal Details	Agents Details (if applicable)
Title	Miss	
First Name	Rosie	
Last Name	Tunnadine	
Job Title (where relevant)	Policy and Parliamentary Affairs Officer	
Organisation (where relevant)	Habinteg Housing Association	
Address Line 1	132 Wakefield Rd	
Address Line 2		
Town	Bradford	
Postcode	BD11 1DR	
Telephone number		
Email address	comms@habinteg.org.uk	
What authority do you live / work in? (Chorley, Preston, or South Ribble)		

**Part B: Please use a separate sheet for each representation you wish to make**

<b>Name or Organisation:</b>	<b>Habinteg Housing Association</b>
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**3. To which part of the Local Plan does this representation relate?**

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.

If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

Comment being made against:	Reference (please provide)
Policy:	HS6: Housing Mix and Density
Paragraph:	1
Development Site:	
Policies Map:	
Evidence:	
Other (Please state):	

**4. Do you consider the Local Plan is:**

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2) Sound  (If you check 'No', please also confirm below which of the 'tests' it fails to meet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Positively prepared	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Central Lancashire Local Plan does not comply with).

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

As an expert housing provider, we welcome the opportunity to comment on the development of the Central Lancashire local plan. Habinteg is a housing association that champions inclusion by providing and promoting accessible homes and neighbourhoods that welcome and include everyone. With over 50 years' experience in housing and disability, we manage over 3300 accessible properties across more than 80 local authorities. We believe that people are disabled by barriers in society and negative public attitudes, rather than by their own impairments.

Habinteg considers paragraph 1 of policy 'HS6: Housing Mix and Density' to not go far enough to provide legal protections for older people and wheelchair users, falling short of the standards set by the Equality Act 2010. Planning inspectors have an obligation to give 'due regard' to the Public Sector Equality Duty (PSED) when exercising their functions. This encompasses a requirement to give 'due regard' to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010. Planning teams, as they perform a public sector role, have an obligation to give 'due regard' to the Public Sector Equality Duty (PSED) when exercising their functions. This encompasses a requirement to give 'due regard' to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010. By limiting M4(2) requirements to housing developments of 10 or more dwellings, or on sites of 0.4 hectares or greater, we believe that disabled and older people may be left without access to suitable new-build homes in Central Lancashire, which may amount to indirect discrimination.

Hence, Habinteg recommends that all market and affordable housing developments of all sizes must meet Building Regulations M4 Category 2 accessible and adaptable standard to meet the needs of disabled and older people in Central Lancashire. By taking swift action to ensure all new homes built in Central Lancashire meet the M4(2) standard, the council could improve health and wellbeing outcomes for its ageing population and support better community and economic participation among older people. Amendments to the M4(2) target in the local plan enhance protections for older and disabled individuals, thereby reinforcing compliance with the Equality Act 2010. In doing so, it would better satisfy the legal obligation to eliminate discrimination and advance equality of opportunity under the PSED. This obligation is further supported by international human rights law: the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), which the UK has ratified, reinforces in Article 28 the right of disabled people to an adequate standard of living and social protection.

Moreover, Habinteg recommends that at least 10% of all new homes meet Part M4(3) Standard (wheelchair user dwelling). Central Lancashire has an opportunity to be more ambitious in supporting disabled and older residents. Homes designed to these standards can help reduce hospital discharge delays and prevent falls in the home. Additionally, they foster social participation by ensuring that disabled and older people can live with dignity,

fully connected with their community and maintaining vital relationships, thereby supporting wellbeing, reducing loneliness and mental ill-health. Homes built to M4(3) standards are more likely to comply with the Equality Act 2010, as they are specifically designed to meet the needs of wheelchair users and those with significant mobility impairments.

Habinteg believe paragraph 1 policy 'HS6: Housing Mix and Density' could do more to positively impact the economic and social value of homes for wheelchair users. Across Chorley, Preston and South Ribble, 2021 census dates shows that, on average, 18.6% of Central Lancashire's population lives with a disability and 18.9% is aged 65 or over which makes planning for more wheelchair user homes not just beneficial but essential for growth. Habinteg's "Living not existing: The economic & social value of wheelchair user homes" report, conducted with the London School of Economics (LSE) found that over a 10-year period, the benefits of living in a wheelchair-accessible home are valued at approximately £94,000 for a working-age adult, £100,000 for an older adult, and £67,000 for a household with a wheelchair-using child. The long-term economic benefits outlined in the report underline the case for adopting a specific target of at least 10% wheelchair user homes in all new developments, strengthening the soundness and sustainability of Central Lancashire's local plan. Moreover, providing more wheelchair user homes helps reduce or eliminate the cost of in-home care assistance, increases individual's disposable income, lowering reliance on welfare benefits, and enabling greater contributions to tax. The cost-benefit of planning more wheelchair user homes reduces pressure on health and social care services, allowing resources to be redirected to those with the highest, most acute needs.

For more information, please contact Rosie Tunnadine, Policy and Parliamentary Affairs Officer, [rtunnadine@habinteg.org.uk](mailto:rtunnadine@habinteg.org.uk).

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Habinteg recommends that all new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).

Habinteg recommends that at least 10% of all dwellings (affordable and market housing) should be wheelchair user dwellings in line with Part M4(3) of the Building Regulations.

For more information, please contact Rosie Tunnadine, Policy and Parliamentary Affairs Officer, [rtunnadine@habinteg.org.uk](mailto:rtunnadine@habinteg.org.uk).

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	Please check the relevant box
No, I do not wish to participate in hearing sessions	<input checked="" type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input type="checkbox"/>

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.**

Please return your completed representation form(s) by post to: Planning Policy Team, Third Floor, Town Hall, Lancaster Road, Preston, PR1 2RL by filling in this representation form.

**Forms must be received by midnight on Monday 14 April 2025.**

