

# THE EMERSON GROUP

EST. 65 YEARS

PLANNING DEPARTMENT

Regulation 19 Consultation  
Planning Policy Team  
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Town Hall  
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Preston  
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Our ref: NS/Planning

14<sup>th</sup> April 2025

Sent via email – [centrallancashireplan@chorley.gov.uk](mailto:centrallancashireplan@chorley.gov.uk)

Dear Sirs,

**RE: CENTRAL LANCASHIRE LOCAL PLAN 2023-2041: REGULATION 19 CONSULTATION**

Please find set out below, representations to the Central Lancashire Local Plan 2023-2041, submitted on behalf of The Emerson Group.

The Emerson Group support the combined authority in its preparation of a new Local Plan enabling Preston, South Ribble and Chorley to plan positively for the region's future economic, environmental and social needs.

Notwithstanding our general support for the preparation of a new Local Plan, and the broad vision and objectives set out within the publication draft; particularly Objective 3 (Sustainable Communities) and 4 (Economic Prosperity), The Emerson Group wish to make the following comments, that we trust will be considered as work on the Local Plan advances.

**The Emerson Group**

The Emerson Group's two primary development operations within the UK comprise its commercial division, Orbit Developments; and its residential division, Jones Homes.

Orbit Developments, established in 1971, has amassed a portfolio across the UK exceeding 8 million sq. ft of commercial property space. The portfolio comprises a broad mixture of commercial uses, including a significant number of office, retail and / or industrial developments and premises. Within the Central Lancashire region, our portfolio includes our landholdings at Buckshaw Village in Chorley and West Strand shopping centre in Preston.

Jones Homes, established in 1959 is one of the UK's leading independent house builders, delivering approximately 500 new homes each year.

Between Orbit Developments, Jones Homes and the other affiliated companies within The Emerson Group, we have a long and successful history of progressing a significant number of planning applications each year.

The below representations are made on behalf of both Orbit Developments and Jones Homes, however it should be noted that additional representation has been made on behalf of Jones Homes via the Home Builders Federation (HBF).

### **Plan Period**

The publication version, as drafted, covers the period from 2023 – 2041. Both the December 2024 and December 2023 iterations of the National Planning Policy Framework (NPPF) require strategic policies to look ahead over a minimum 15-year period from adoption.

Review of the Central Lancashire Local Development Scheme (LDS), endorsed by the three authorities in March / April 2024, sets out the intended timeline for the preparation of the Plan. It is evident that the anticipated timescale for the adoption of the Local Plan is by December 2026.

The Emerson Group has general concerns that the timing of this (Reg 19) consultation and the proposed plan period, appear somewhat arbitrary and – it appears - intended to simply meet the minimum requirements for the Local Plan to continue under the transitional arrangements set out within Annex 1 of the (December 2024) Framework. Further clarification and importantly, evidence, should be provided to justify the projected timescales for the Local Plans' preparation; and also to support the proposed plan length.

It is our view that the draft timescale for plan preparation does not take into reasonable account the potential delay or slippage that typically is encountered over the course of preparing a new development plan. On this basis The Emerson Group considers that the plan period should extend to 2042, as a minimum.

Both the 2023 and 2024 Framework are clear in that policies should look further ahead where significant extensions to towns and villages are proposed to take account for the likely timescales for delivery. On review, given the scale of the proposed Strategic Site Allocations at North West Preston / Bartle; Preston West; and Penwortham; together with other major housing allocations that immediately neighbour these sites, a longer plan period should be considered. Given current global economic and political instability, an additional 5 years (or more) could provide additional flexibility, should delivery on any of these major sites be delayed.

### **Policy HS1: Scale of Housing Growth and Distribution of Housing Requirements**

The Emerson Group has similar concerns to those set out above, regarding how the scale and distribution of housing growth has been determined. It again would appear that the level of housing growth has been set arbitrarily to accord with the transitional arrangements. This is exemplified by the decision to 'simply' add 77 dwellings per annum to 'top-up' the proposed annual housing requirement without any substantive works to consider need in the context of the latest standard methodology for calculating housing need. The latest standard method identifies that a greater level of housing need exists within the Central Lancashire sub-region, and the new Local Plan should be progressed on this basis.

### **Policy EC5: Mixed Use Allocations Chorley**

The Emerson Group has extant planning permission (app ref: 09/00659/REMMAJ) to construct three large office buildings on the proposed allocation at “Southern Commercial, Buckshaw Village” (EC5.1).

Despite the benefit of planning permission, in the subsequent 15 years since permission was granted, market interest in this location (for offices) has not been as strong as envisaged. This is despite continual marketing of the land by Orbit Developments and the speculative construction of one of the five approved offices under permission 09/00659/REMMAJ (which spans both eastern and western sides of Station Approach) in an attempt to stimulate market interest.

The policy as drafted does not evidence how the split of ‘residential’ and ‘employment’ areas for each of the mixed-use allocations has been calculated. It is important that further justification is provided.

The Emerson Group very much welcome the principle of a mixed-use allocation at Buckshaw Village, and the additional opportunities afforded by this to broaden its market appeal. However, given this sites prominent location, we respectfully request that there must be some additional flexibility to enable variance from the amounts of residential and commercial development prescribed in the policy. Furthermore, clarification on the forms of development that would be considered acceptable within an allocated mixed-use area should be provided. For example, it is assumed that for prescribed ‘employment areas’ within a mixed-use allocation (in the case of EC5.1 measuring 0.54 Ha), the general provisions set out within paragraph 5.14 of the Local Plan would apply. I.e. employment use would comprise any proposals falling within the definition of Use Classes E(g)(i), E(g)(ii), E(g)(iii), B2 and B8.

However, this should be clarified, as paragraph 5.14 appears to only relate to Policy EC7 and not necessarily also policies EC5 and EC6.

Further clarification should also be provided as to what forms of residential development would be considered acceptable within an allocated mixed-use area. Given the site’s sustainability credentials and proximity to public transport, combined with the Borough’s aging population, there is a strong case to be made for alternative forms of residential accommodation being considered appropriate in such locations, in particular those falling within Use Classes C1 and C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended), including care and nursing homes, assisted living accommodation and other forms of specialist accommodation.

Policy EC5 must enable proposals for the whole site (in the case of EC5.1 equating to 2.04 Ha) to be considered positively. For example, a proposal comprising a B8 ‘employment’ use for the whole site should be considered on its merits as an employment generating use and should not necessarily be prejudiced or penalised by the need to deliver a prescribed level of housing.

Similarly, the reverse should be applicable. A site for 0.54 Ha of employment use may not be particularly appealing to the market given its modest size, and it should be noted that The Emerson Group already has extant permission to construct another large office building on the remaining land on the eastern side of Station Approach (also app ref:09/00659/REMMAJ – “Building E”).

Therefore, proposals that comprise a larger element of ‘residential’ use should also be considered on its merits.

## **Conclusion**

The Emerson Group supports the preparation of a new Local Plan for Central Lancashire and supports the inclusion of site EC5.1 as a mixed-use allocation. Notwithstanding this support, further refinement of the Policy EC5 is needed to clarify which forms of residential use would be supported in mixed-use areas.

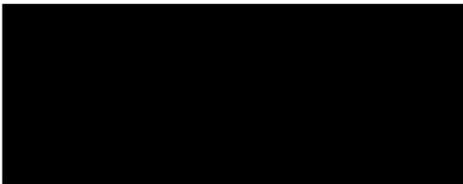
More broadly The Emerson Group has concerns about the formulation of the housing policies within the plan, and how – it appears that – these have been designed primarily to enable the Local Plan to qualify for the transitional arrangements and not to be progressed on the basis of the most recent revision to the Framework and the latest standard method for calculating housing need.

It is evident that continuing to progress the plan under the transitional arrangements would likely compromise the integrity of the plan, and there are notable risks that such primary compromises may be deemed un-sound.

We trust the above comments will be considered in detail when further progressing work on the Central Lancashire Local Plan 2023 - 2041.

Should you have any questions relating to these representations, then please do not hesitate to contact this office.

Yours faithfully,



**Nick Scott**  
**Senior Planner**