

# Central Lancashire Local Plan Publication (Regulation 19) Draft

## Representation on behalf of Northern Trust Land Ltd Policy HS1 ‘Scale of Housing Growth and Distribution of Housing Requirement’.

1. De Pol Associates are retained by Northern Trust Land Ltd to submit representations to the Publication (Regulation 19) draft of the Central Lancashire Local Plan 2023-2041 (CLLP). This representation relates to policy HS1 ‘Scale of Housing Growth and Distribution of Housing Requirement’ and should be read in conjunction with a statement produced by Stantec Development Economics dated 8 April 2025 titled ‘Central Lancashire Housing Need’, which is submitted with this representation.
2. Policy HS1 has two parts, the first sets the housing requirement for Central Lancashire as a whole and the second proposes a spatial redistribution of the housing requirement between the three individual authorities.
3. The NPPF was updated in December 2024 (NPPF24) and states:

*“61. 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. The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.*

*62. 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 practice guidance.....”*
4. The standard method in national planning practice guidance (PPG) was also changed as part of the NPPF24 amendments, although NPPF24 paragraph 234 states that for the purpose of preparing local plans the policies in the new NPPF24 will apply other than where one or more identified circumstances are applicable. One of these circumstances is a plan which has reached



Regulation 19 stage on or before 12 March 2025 and its draft housing requirement meets at least 80% of the LHN using the new standard method. Table 1 below compares the policy HS1 housing requirement with the LHN based on the standard method in NPPF24<sup>1</sup> and the previous NPPF published in December 2023 (NPPF23).

Table 1: HS1 housing requirement compared to NPPF24 and NPPF23 LHN

	Chorley		Preston		South Ribble		Central Lancashire	
	Annual Requirement	Total Plan requirement						
<b>NPPF24 LHN</b>	564	10,152	590	10,620	489	8,802	1,643	29,574
<b>NPPF23 LHN</b>	506	9,108	269	4,842	169	3,042	944	16,992
<b>CLLP Policy HS1 draft requirement</b>	334	6,012	520	9,360	460	8,280	1,314	23,652

5. The CLLP reached Regulation 19 stage prior to 12 March 2025 although as evident from Table 1 the CLLP cannot progress with a Central Lancashire housing requirement based on the NPPF23 standard method as this would equate to just 58% of the LHN using the new NPPF24, well below the 80% threshold referred to in NPPF24 paragraph 234.
6. To avoid having to deliver the much higher NPPF24 LHN Policy HS1 of the CLLP proposes an alternative housing requirement figure which has been arbitrarily set at the required 80%. It is noted that if the LHN based on NPPF24 were recalculated using the affordability ratios updated in March 2025 the Central Lancashire LHN increases to 1,663dpa and the draft policy HS1 housing requirement would only equate to 79%, meaning the NPPF transitional arrangements are not met. Notwithstanding, for the purposes of this statement when the NPPF24 LHN figures are referred to these are based on the position at December 2024.
7. Whilst NPPF24 paragraph 234 states that Plans which meet the 80% threshold can be considered against the previous NPPF23 this does not mean that the housing requirement should be arbitrarily set at 80%. For the plan to meet the test of soundness NPPF23 paragraph 35 still requires it to be positively prepared which as a minimum meets the objectively assessed needs using a clear and justified method as set out in NPPG paragraph 61, represents an

<sup>1</sup> LHN is taken from Government's indicative housing figures published in December 2024



appropriate strategy taking into account the reasonable alternatives and evidence, and is consistent with national policy to enable the delivery of sustainable developments in accordance with the policies of NPPF. This includes policy objectives such being prepared positively in a way that is aspirational (paragraph 16b) and significantly boosting the supply of homes by ensuring a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed. The overall aim being to meet as much of an area's identified housing need as possible (paragraph 60).

8. With regards to the need to, as a minimum, meet the objectively assessed needs paragraph 61 of NPPF23 states that strategic policies should be informed by a local housing need assessment conducted using the standard method in national planning guidance. It states that the outcome of the standard method is an advisory starting-point for establishing a housing requirement and that there may be exceptional circumstances which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. Paragraph 63 states that within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, which includes those who require affordable housing; families with children and older people. Paragraph 67 states:

*“The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”*

9. The PPG at the time stated in paragraph: 010 reference ID: 2a-010-20201216 that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. It stated that the standard method for assessing LHN provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, it confirmed there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.
10. The PPG went on to state that 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;

11. The PPG also acknowledged that there may be situations where previous levels of housing delivery in an area are significantly greater than the outcome from the standard method

12. Table 2 below shows the housing completions in Central Lancashire since 2013 which is essentially Table 3 from Central Lancashire Housing Study Update December 2024 but with a column showing the average delivery.

Table 2: Dwelling completion rates in Central Lancashire

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Average
<b>Preston</b>	142	488	282	791	634	785	828	828	1,064	1,405	1,630	807
<b>South Ribble</b>	346	486	371	237	312	437	412	424	513	701	580	438
<b>Chorley</b>	582	723	597	517	661	573	640	306	228	309	291	537
<b>Central Lancashire</b>	1,070	1,697	1,250	1,545	1,607	1,795	1,880	1,558	1,805	2,415	2,501	1,738

13. Tables 1 and 2 above show that in Chorley the LHN based on NPPF23 (506dpa) is slightly below the average completion rate (537 dpa). It is noted that whilst completions in Chorley did not drop below 500dpa for the seven years between 2013 and 2020 they have dropped since 2020/21. This drop in completions correlates with Chorley Council not having been able to demonstrate a deliverable five year housing supply for the last four years and in December 2023 being designated by the SoS for special measures due to its poor performance in deciding major planning applications, where a number of major housing applications had to be approved on appeal. This will inevitably have been a contributing factor to the more recent drop in the completion rate. Nevertheless, the average completion rate over the last 11 years has still been 537dpa which broadly reflects the NPPF23 standard method figure of 506dpa.



14. In contrast, the NPPF23 LHN for Preston (269 dpa) and South Ribble (169 dpa) is significantly below the past average completion rates within these two authorities over the same period, which is 807 dpa and 438 dpa respectively. Indeed Table 2 shows that dwelling completions in Central Lancashire as a whole have consistently been higher than the NPPF23 combined LHN of 944dpa, having averaged 1,738 dpa since 2013.
15. Furthermore, the NPPF23 based LHN of 269dpa and 169dpa for Preston and South Ribble does not take account of the growth strategies committed to by these two authorities based on strategic infrastructure improvements funded through the City Deal, which had the specific aim of promoting and facilitating housing growth. To deliver the outcomes set out in the City Deal the various partners agreed to establish an Infrastructure Delivery Programme and Investment Fund which together amounted to £434m to enable the delivery of critical infrastructure and allow the full development of significant commercial development and housing schemes. This includes four major highway schemes which have been completed / are under construction. Some of these projects also required private land to be compulsory purchased which was justified to be in the wider public interest due to the need to provide the level of employment and housing expected under the City Deal.
16. The City Deal and past housing delivery clearly fall under the aforementioned PPG examples of when it is appropriate to plan for a higher housing need figure than the NPPF23 standard method indicates. However, and as stated, it is still necessary for this alternative housing requirement to be based on robust evidence and prepared positively in a way that is aspirational and meets objectives to significantly boost the supply of housing and ensure that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.
17. The draft housing requirement in CLLP Policy HS1 is based on an alternative employment-led approach using employment growth forecasts and a 1:1 commuting ratio for each authority. This is set out in the Central Lancashire Housing Study Update produced by DLP Planning in December 2024 which suggests a higher housing need in Preston (441dpa) and South Ribble (386dpa) compared to the NPPF23 LHN but identifies a significantly reduced need in Chorley Borough of 410dpa compared to the NPPF23 LHN of 506dpa. This totals 1,237dpa for Central Lancashire which is less than the aforementioned 80% threshold in NPPF24 paragraph 234. As such the actual housing requirement identified in policy HS1 is arbitrarily increased by 77 dwellings to 1,314 dpa, totalling 23,652 dwellings over the plan period.



18. Furthermore, rather than distributing the housing requirement between the authorities in line with the identified need the policy redistributes housing need away from Chorley to Preston and South Ribble. This results in the identified housing requirement in Chorley comprising just 82% of its need as identified in the employment-led assessment, just 66% of its LHN using the NPPF23 standard method, just 59% of its LHN using the NPPF24 standard method. It is also just 62% of the average annual completion rate in the Borough over the last 11 years. Furthermore, policy HS1 also proposes to step the housing requirement in Chorley by pushing some of the housing need in the first three years of the plan towards the later stages of the plan.
19. It is considered that the draft housing requirement and spatial redistribution set out in Policy HS1 fails the test of soundness on the following grounds, which are then expanded upon in turn.
- The alternative employment-led housing need assessment underpinning the draft housing requirement underestimates the housing need in Chorley and Central Lancashire as a whole. It is not therefore positively prepared or justified.
  - The redistribution of housing within Central Lancashire results in insufficient housing being delivered in Chorley Borough contrary to the requirement in NPPF23 for a sufficient amount and variety of land comes forward where it is needed and that that the needs of groups with specific housing requirements are addressed (paragraph 60. It is not therefore consistent with national policy and is not justified taking into account reasonable alternatives.
  - The proposed stepping of the housing requirement in Chorley is inappropriate and unnecessarily delays meeting identified development needs. It fails the tests of having to be positively prepared, justified and consistent with national policy.

### **Central Lancashire Total Housing Requirement**

20. Northern Trust are part of a consortium of developers who have retained Stantec Development Economics to consider the evidence base informing this proposed draft CLLP housing requirement. This Stantec report dated 8 April 2025 and titled Central Lancashire Housing Need is submitted with this representation. It questions the robustness of the conclusions reached in the employment-led assessment which informed the housing requirement figures and



highlights that it is based on overly cautious employment forecasts, makes mistakes in the data used and highlights that the requirement figures would fail to adequately meet affordable housing need which is significantly underestimated, especially in Chorley.

21. In summary, whilst the draft CLLP housing requirement for Central Lancashire as a whole may be higher than the LHN based on NPPF23, its evidence base is flawed and it does not meet the NPPF23 requirement for plans to be prepared positively in a way that is aspirational, nor does it meet the objective of significantly boosting the supply of housing by ensuring a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements, including affordable housing, are addressed.

### **Spatial Distribution of Housing Requirement**

22. The policy HS1 spatial distribution results in just 25% of the Central Lancashire draft housing requirement being directed to Chorley, which is significantly below the Borough's share of Central Lancashire's housing need based on NPPF23 (54%), NPPF24 (34%) and the CLLP's own employment-led housing assessment which informed policy HS1 (33%). It also results in a housing requirement in Chorley which is 1,368 dwellings less over the plan period than the need identified in the employment-led assessment. The shortfall based on the NPPF23 and NPPF23 standard method LHN is even greater at 3,096 dwellings and 4,140 dwellings respectively. This equates to a significant amount of Chorley's identified housing need, including affordable housing need, being delivered away from the Borough to Preston and South Ribble.
23. The explanatory text to policy HS1 states in paragraph 4.15 that the CLLP draft housing requirement is based on an employment-led scenario to ensure that each Central Lancashire authority will provide 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. That the employment led approach provides the basis of the CLLP housing requirement because it aligns housing need with anticipated job growth, reinforces sustainable patterns of commuting and reflects market signals and previous rates of delivery. However, the CLLP's own evidence base identifies the employment-led housing need in Chorley as 410dpa and it is unclear as to how redistributing so much of Chorley's employment-led housing need to Preston and South Ribble complies with this objective of aligning housing need with anticipated job growth and reinforcing sustainable patterns of commuting.



24. Furthermore, and as expanded upon in the supporting statement by Stantec, the CLLP evidence significantly underestimates the affordable housing need in Central Lancashire and contrary to the CLLP assertion it is considered that the evidence indicates that 51.4% of the affordable housing need within Central Lancashire actually falls within Chorley. Redistributing so much of Chorley's housing need to Preston and South Ribble will worsen the affordable housing shortfall in Chorley and undermine the ability to meet other specialist housing requirements. This is contrary to the NPPF23 requirement for a sufficient amount and variety of land to come forward where it is needed (paragraph 60).
25. The Central Lancashire Local Plan: Approach to Meeting Housing Need Document states that with regards to the redistribution of housing need the spatial option continues to deliver growth in line with the settlement hierarchy, promoting growth in the most sustainable locations (Policy SS1). That the purpose of this policy is to support the achievement of sustainable patterns of development in Central Lancashire over and beyond the plan period. However, this is not considered to be the case.
26. By way of example, Croston in Chorley is a settlement containing a designated Local Centre with a variety of food and non-food retail shops including Morrisons and Lonsdale supermarkets, chemists and a post office. It has two doctors surgeries and dentist, primary and secondary schools, churches, public houses, eating establishments, hot food takeaways, cafes and a community centre. There is a sports club with football, cricket, tennis and netball facilities as well as restaurant, sports bar and function room. There is also a village recreational ground and an industrial estate. It also has sustainable transport options including a railway station providing regular services to Preston and Ormskirk and a bus route through the village providing regular services to Chorley, Preston and Rufford. It is clearly an accessible settlement with a level and range of services and facilities which makes it suitable to accommodate growth in line with the sustainability objectives of the CLLP and NPPF. Indeed in the Regulation 18 Preferred Options Plan it was identified as a Tier 4 Local and Rural Centre where along with Tier 3 settlements "*moderate growth and investment will be directed*" and where a housing allocation of 186 dwellings was proposed (allocation CH/HS1.34).
27. However, allocation CH.HS1.34 has been removed in the Publication Plan due to access constraints and as the Green Belt tightly constrains the settlement the only housing allocation now proposed is a small site within the settlement boundary for 2 dwellings (HS2.22). This is despite it clearly being a sustainable village for growth and NPPF23 paragraph 83 stating that



housing should be located where it will enhance or maintain the vitality of rural communities and planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Furthermore, whilst Croston is still a Tier 4 settlement in the settlement hierarchy contained in policy SS2, the policy has downgraded these Tier 4 settlements from being suitable for moderate growth to being suitable for limited development.

28. In contrast, the Regulation 19 Plan is allocating 5 sites totalling 122 dwellings at the village of Mawdesley despite this being a Tier 5 'smaller rural village and hamlet' where policy SS2 states "*more limited new development*" is acceptable and the village is nowhere near as sustainable as Croston. Indeed, the CLLP is allocating more housing at these Tier 5 smaller rural villages and hamlets in Chorley (332 dwellings across five villages) than at the more sustainable Tier 4 Rural Local Service Centres in Chorley i.e. Croston and Eccleston (just 83 dwellings).
29. It is evident that the spatial distribution is being influenced by what sites are available outside the Green Belt rather than necessarily the most sustainable locations or where housing is needed. Indeed the Housing and Employment Allocations: Site Selection Process (2025) document implies as much in so far as it states at paragraph 5.2 that Chorley has unmet need against the housing requirement set out in the Housing Study but as Preston and South Ribble are able to meet this unmet need a redistribution of the Housing Study requirements was applied. As such Green Belt release in Chorley was not required and could not be justified.
30. Firstly, there are examples where housing allocations in the Regulation 18 Preferred Options Plan have been unnecessarily reduced in size even though the land is not within the designated Green Belt, such as allocation HS2.10 Little Knowley Farm, Chorley. This site is discussed in more detail in a representation to policy HS2.
31. Secondly, the Green Belt in Chorley was established over 40 years ago and is significantly curtailing the ability of sustainable settlements to grow contrary to NPPF23 paragraph 83. It is acknowledged that NPPF23 paragraph 146 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries the strategic policy-making authority should be able to demonstrate that it has examined fully all other "*reasonable options*" for meeting its identified need for development. This includes discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. However, NPPF paragraph 145 confirms that strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period. Furthermore, NPPF

objectives also include ensuring 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 housing is to be promoted where it will enhance or maintain the vitality of rural communities and enables opportunities for villages to grow and thrive.

32. It is not considered that redistributing this amount of housing need away from Chorley, which also has the highest affordable housing need in Central Lancashire, in a manner which will result in sustainable settlements being unable to grow in line with NPPF objectives is a 'reasonable' alternative option to Green Belt release. This is especially given that there are sustainable Green Belt sites where the only contribution to the five Green Belt purposes is a limited contribution to assisting safeguarding countryside from encroachment and the result of redistributing land away from Chorley is still resulting in the extension of urban areas into open countryside.
33. An example of suitable Green Belt release in Chorley is highlighted in representations relating to policy HS2, which includes a site located immediately adjacent the built-up area of Croston, sandwiched between existing housing development to the west, east and north and where existing development and boundary trees/landscaping visually and physically separates the site from the remaining Green Belt. It has a suitable access already in place which could also provide an access solution to unlock previously proposed housing allocation CH/HS1.34 which has been removed due to access constraints.



Potential Green Belt release at Croston



34. Ultimately it is considered that the re-distribution of housing need away from Chorley Borough does not represent a sustainable pattern of development, the draft housing requirement in Chorley is insufficient to meet the identified need in Chorley, will worsen affordable housing shortfalls in the Borough and conflicts with NPPF objectives relating to sustainable growth and delivering housing where it is needed and that the needs of groups with specific housing requirements are addressed. It fails the test of soundness as it is not positively prepared, justified or consistent with national policy.

#### **Chorley Stepped Housing Requirement**

35. CLLP paragraph 4.10 steps the housing requirement in Chorley with 280 dpa in the first 3 years of the plan period between 2023-2026 increasing to 345 dpa from 2026/27 onwards, i.e. from the point of anticipated adoption. Essentially it is looking to deliver the anticipated 162 dwelling shortfall from the first three years against the identified policy HS1 requirement of 334dpa and then spread this across the remaining 15 years of the plan period (Liverpool approach). In so doing it is delaying the delivery of this shortfall rather than ensuring the under provision is provided for within the first five years from adoption (Sedgefield approach).
36. There is no justification to step Chorley's housing requirement in this manner, especially in the context where the CLLP is already proposing a housing requirement in Chorley which is below its identified need. It also conflicts with paragraph: 012 Reference ID: 68-021-20190722 of the PPG which states under the heading 'When is a stepped housing requirement appropriate for plan-making?' that a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and *"not seek to unnecessarily delay meeting identified development needs"*.
37. There are no strategic sites within Chorley of a scale that would justify the need for a stepped housing requirement which delays the provision of housing within Chorley based on its identified need. Such a proposal is even more perplexing given that the CLLP's draft annual housing requirement for Chorley is lower than previous policies and past completion rates.
38. No robust case is made within the CLLP to justify why a stepped requirement in Chorley is appropriate or why any under delivery at any stage in the future should be spread out over a



longer period. It fails the test of soundness as it is not positively prepared, justified or consistent with national policy.