

**Our Ref** ADT/SAR/Reg 19 2025 Repts  
**Date** 14<sup>th</sup> April 2025  
**Reply to:** Preston Office

Central Lancashire Local Plan

By Email: Central Lancashire Local Plan Review [centrallancashireplan@chorley.gov.uk](mailto:centrallancashireplan@chorley.gov.uk)

Dear Sirs

**Land Located on the South Eastern Side of Croston Road and East of Fowler Lane, Farington  
Central Lancashire Local Plan 2023-2041  
Regulation 19 Representations**

These representations are made on behalf of PJM Property Investments Limited to the strategy policies of the Central Lancashire Local Plan Publication Version.

Our client wishes to promote one site in South Ribble for residential development. Representation to Central Lancashire's approach to the housing requirement, distribution and information relating to our client's site are set out herein.

A: **Policy HS1** – Scale of Housing Growth and Distribution of Housing Requirement

1. The proposed housing requirement of 23,652 net new dwellings is to be delivered between 2023 and 2041 and has in our opinion been artificially arrived at a means to comply with the transitional arrangements in the new Framework (NPPF 234a) so that the draft Plan is examined under the previous version of the Framework (NPPF 235). This requires a plan to have reached Regulation 19 stage on or before the 12<sup>th</sup> March 2025 and its drafting housing requirement meets at least 80% of local housing needs using the standard method in PPG published on the 12<sup>th</sup> December 2024.
2. The joint Central Lancashire Council agreed that the proposed housing requirement should be higher than the previous standard method figure of 944 dpa and the evidence base (Central Lancashire Housing Study Update – December 2024).
3. The 1,237 dpa requirement is 77 dpa is short of being 80% of the local housing need figure of 1,634 using the standard method published on the 12<sup>th</sup> December 2024 (80% is 1,314 dpa). The supporting text to Policy HS1 (paragraph 4.19) explains that the employment led growth scenario CR-1:1 requirement of 1,237 dpa has been "slightly increased" by adding 77 dpa in order to achieve 80% of the revised local housing need figure. This arbitrary process is clearly contrived and therefore flawed, and is not a sound, evidenced based approach.
4. The methodology of simply adding 77 dpa to the evidence (employment-led growth scenario CR-1:1) housing requirement to achieve 80% of the revised local housing need is not how the Government expects Local Authorities to use the NPPF transitional arrangements and especially as 80% is a minimum figure! The Government set ambitious housing targets to meet the national objective in delivering 1.5 million new homes in the current parliament and that means all Local Authorities must plan to meet as much of their requirement as possible.

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This is clearly in the Written Ministerial (HCWS48) “Building the New Homes we Need” made on 30<sup>th</sup> July 2024 by the Deputy Prime Minister, whereby “Local Authorities will be expected to make every effort to allocate land in line with their housing need as per the standard method, and will need to demonstrate they have done so at examination of their plan”.

5. The housing land supply evidence base shows that there is available supply to meet a more ambitious housing requirement than 80% of the local housing need, and including sites in the Green Belt that can be released and allocated without undermining the function of the Green Belt as a whole, and there is a market capacity to deliver a high figure as previous annual completion rates show that the average of 1,650 dpa was delivered in Central Lancashire between 2013/14 and 2023/14 compared to the 1,314 dpa proposed.
6. The evidence confirms that the policy HS1 should therefore be modified to set a higher figure than 23,652 net new dwellings.

**B: Housing Supply Headroom**

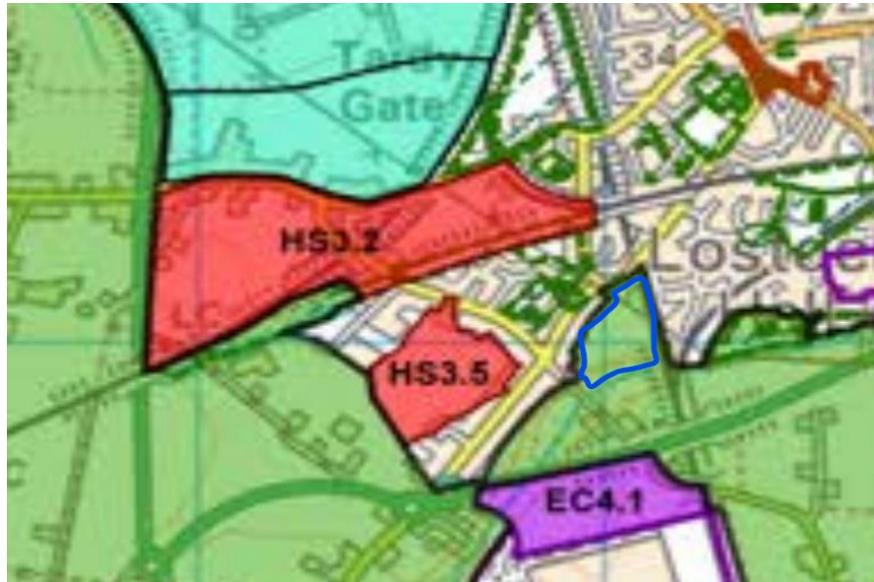
7. Notwithstanding the previous commentary in respect of the fact the housing requirement should be set higher, because there is land available and market capacity to meet more than 80% of the local housing need, the housing requirement should also be increased to ensure that there is sufficient headroom (supply buffer) to account for slippage and non-delivery on planned sites.
8. The proposed headroom is just 1,927 dwellings over the planned period, which is 8% (projected completions of 25,579 dwellings minus the proposed requirement of 23,652 dwellings). A figure as low as 8% does not provide such flexibility for the draft Plan given its scale and complexity and the importance of delivering growth and investment in Central Lancashire.
9. A more appropriate buffer would be at least 15% or ideally 20% and can be achieved by allocating more land for inclusion in Policies HS2, HS3 and HS4.
10. The evidence base shows that there is suitable and achievable land available to increase the supply headroom and including sites in the Green Belt which can be released and allocated (or safeguarded) without undermining the function of the Green Belt as a whole.

**C: Omission Site – Land at Croston Road, Farington**

11. The site is located on the south eastern side of Croston Road and east of Fowler Lane in the Farington area of South Ribble. It comprises a site area of approximately 5 hectares (12.3 acres).
12. The site comprises a single field used as pastoral farmland. It is bordered on the northern side by existing individual residential housing along Croston Road and a limited amount on Fowler Lane with the rest defined by mature hedgerows. The site is part dissected by the River Lostock. Vehicle access to the site can be achieved from both Croston Road and also Fowler Lane although it is anticipated that the main access would be from Fowler Lane. The West Coast Main Line is just beyond the site’s Eastern boundary.



13. In the Adopted South Ribble Local Plan the site is designated as Green Belt.
14. In the draft Local Plan the site is also shown as remaining in Green Belt (see extract below edged blue). It is also shown in context of two allocated residential sites an employment allocation and the urban area of Lostock Hall.



15. These representations consider the site should be included as an allocated residential development site purely on the merits that as designated Green Belt land it serves no merit to the Green Belt.
16. Whilst a small part of the site is adjacent to the River Lostock is in Flood Zone 3 the majority is unaffected by the Environment Agencies assessment of Flood Risk in the locality.

17. It is our estimate that approximately 3.48 hectares (8.1 acres) could be developed for mixed house types including affordable homes to meet local requirements. The site could yield approximately 90/100 housing units within a period of five years once allocated and planning permission is granted which is well within the scope of the new Local Plan.
18. The site serves no merit under its proposed Green Belt allocation simply because it is an isolated parcel of land between existing residential development, the River Lostock and the West Coast Main Line which lies along the further north eastern boundary of the site. Fowler Lane is historically a major link to Leyland and is now a cul-de-sac. It retains, however, a wide crossroad junction with Croston Road and Church Lane with excellent visibility. The site is within a short walking distance of local amenities and is located directly opposite Farington Moss St Paul's Primary School.
19. In comparison terms it is not wholly different from the site allocations to the south of Chain House Lane in South Ribble site reference HS.3.2 – Aspley House and that West of Church Lane - HS.3.5.

D: **Ecology and Trees**

20. The site is not subject to any statutory or non-statutory ecological designation. Existing trees and hedgerows on the perimeter of the site could be retained and strengthened as part of the development (aside from those required to be removed to create a new access point). New tree planting could be secured on retained land. At present, the existing trees within the site are not subject to any management and a planning application could secure the strengthening of the existing planning and its long-term maintenance via a management plan.
21. Any future planning application would be supported by ecological and arboriculture assessments.

E: **Heritage**

22. A review of Historic England website shows that there are no Listed Buildings, Conservation Areas, Registered Parks/Gardens/Battlefields, World Heritage Sites or Schedules of Ancient Monuments at the site.
23. Residential Development could come forward whilst not undermining the character of any Heritage Asset.

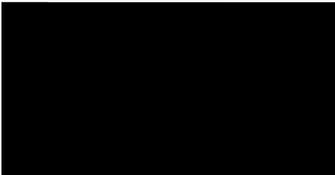
F: **Local Infrastructure**

24. The site is located approximate 4 kilometres north of Leyland with no obvious constraints in terms of utilities, surface and foul water connections. It is in close proximity to existing key services such as public transport, schools [directly opposite Farington Moss St Pauls Primary School] and health facilities in Lostock Hall.
25. With due regard to the scale of development proposed, the allocation of the site would not place any undue pressure on local infrastructure and services.
26. Any planning application could secure the provision of developer contribution to the local services such as education and health facilities where appropriate and in accordance with the planning policy requirements set out in the Community Infrastructure Levy Regulations.

G: **Proposed Allocation**

27. Our clients site shares many of the same characters as the allocated residential land sites (site reference HS.3.2 – Aspley House and HS.5.3) and our view is that it is similarly suitable and achievable for housing development with no unknown constraints other than that reference. The site would arguably be a natural extension and infill to the existing dwellings in Farington and should be allocated for residential development to address local housing need and shortage in supply. This same point has also been set out notably by Stantec in representations on behalf of numerous volume house builders on other Green Belt sites.
28. It is considered the site is capable of accommodating approximately 90/100 dwellings and we would suggest that the site is taken out of the Green Belt and a site specific allocation should be made in respect of this site stipulating the follows:
- i) Provision of around 100 comprising appropriate mix of sizes and tenures.
  - ii) Appropriate access for vehicles, traffic and pedestrians from Croston Road and Fowler Lane.
  - iii) Provision of comprehensive landscape plan for retention and enhancement of ecological and landscape features, including existing trees and hedgerows where possible.
  - iv) Contribution to Local Infrastructure where appropriate and in accordance with planning policy requirements.

Yours faithfully



**Andrew Taylorson**  
**Eckersley**  
**For and on behalf of PJM Property Investments Limited**