

Central Lancashire  
Local Plan

**Regulation 19 Consultation Response**

Hollins Strategic Land

14 April 2025

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# 1 Policy HS1 (Strategic Policy)

## Plan Period

- 1.1 The plan period is proposed to be 2023 to 2041.
- 1.2 Paragraph 22 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth:

*“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

*a) housing (including affordable housing), employment, retail, leisure and other commercial development;*

*b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

*c) community facilities (such as health, education and cultural infrastructure); and*

*d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*

- 1.3 Paragraph 22 of the Framework requires strategic policies to cover a 15 year plan period from adoption:

*“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.”*

- 1.4 The Council’s proposed schedule for the adoption of the Local Plan is set out in the 2024 LDS which is:

- Consultation Pre-Submission Plan (Publication stage) – February 2024 to April 2024
- Submission to Planning Inspectorate – by 30<sup>th</sup> June 2024

- Examination in Public – late 2025 until Summer/early Autumn 2026
- Adoption – Expected no later than 31st December 2026.

- 1.5 The end date of the strategic policies relating to housing and employment land supply is 31 March 2041. Therefore, even on the basis of the Council’s own proposed timetable, the plan will only have a plan period of 14 years 3 months after adoption and therefore would not cover a period of 15 years. Therefore, it is considered to be unsound and not in accordance with national policy.
- 1.6 Even if the LDS is correct and the Plan is adopted no later than December 2026, the Local Plan period must be extended to 2042 in order to be consistent with national planning policy.
- 1.7 The above assumes that there are no delays between now and then, which in our view is unrealistic. It is also important to note that Local Plan examinations have historically taken multiple years. Specific examples include the Cheshire East Local Plan Strategy which took over 3 years and the Halton Delivery and Allocations Plan which took 2 years. More recently, Planning Inspectors have paused public hearings being held as part of the examination into the Charnwood Local Plan 2021-2037 to allow more time for consideration of information relating to Leicester’s unmet housing need. Whilst we appreciate this may not specifically apply to the case of Central Lancashire’s Local Plan, it further demonstrates the issues and delays which can take place during the examination process. This issue has also been recently raised by the Inspectors for the Wiltshire Local Plan and in their letter dated 27<sup>th</sup> February 2025 state:

*“The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities.*”

*We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified.”*

- 1.8 The plan period should be extended to 2042 as a minimum in order to be considered sound for submission.

### Housing Requirement

- 1.9 The housing requirement for Central Lancashire is proposed to be 23,652 homes to be delivered between 2023 and 2041, at an annual average of 1,314 homes. Our representation under Policy HS1 focuses on the use of the transitional arrangement to progress with a local plan to avoid the consequences of meeting the standard method figure.
- 1.10 The publication of the revised Framework in December 2024 and the new Standard Method sets out a need for 1,643 dwellings per annum. Under the transitional arrangements in the Framework, the policies in the revised Framework will apply from 12 March 2025 other than where one or more of the criteria are met. Criterion (a) is that the plan has reached Regulation 19<sup>82</sup> (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need. In the case of Central Lancashire, they have prepared the Plan on the basis of it meeting exactly 80% of the standard method which is 1,314 dwellings. We address this calculation later but for this part of these representations, we proceed on the proposed requirement in Policy HS1 is 1,314 dpa and that paragraph 234(a) applies, and the plan will be examined under the relevant previous version of the Framework.
- 1.11 Paragraph 61 of the 2023 Framework states:

*“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 guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area 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. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for<sup>26</sup>”*

1.12 Local Housing Need is defined in Annex 2 of the Framework:

*“The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).”*

1.13 Paragraph 2a-010 of the PPG provides the following guidance on when it is appropriate to plan for a higher housing need figure than the standard method:

*“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”*

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need 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, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). 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;*
- *There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”*

1.14 The authorities also agree that the housing requirement should be increased above the standard method of 944 dpa and HO9 concludes that *“Based on an evaluation of the updated scenarios, presented in Section 5, the recommended (or preferred) housing need scenario is the Employment-led (CR 1-to-1) scenario which corresponds to an equivalent 1,237 dwellings per annum”*.

1.15 However, the authorities have fallen into error due to the increase of 77 dpa to meet the transitional arrangements as explained in paragraph 4.19 of the Plan which states:

*“4.19 Following publication of the revised NPPF in December 2024, the annual housing requirement for Central Lancashire has been increased slightly to 1,314 dwellings per annum in order to achieve 80% of the LHN using the new standard method formula, in accordance with the transitional arrangements. The additional 77 dwellings per annum has been distributed between the three authorities.”*

1.16 This increase is not evidence based and is simply a mathematical calculation to meet the transitional arrangements and does not fall within the scope of the circumstances set out in the PPG. We acknowledge the list in the PPG is not exhaustive but any increase should be evidence based and for that reason the plan is not sound and therefore cannot be considered under the 2023 Framework.

1.17 Using the proposed requirement in HS1, the total number of dwellings to be delivered is 23,652 dwellings, whereas if the standard method at the Regulation 19 stage is used, the total requirement for the plan period would be 29,574 dwellings. This is a total of 5,922 dwellings not being planned for through what we consider an inappropriate application of the transitional arrangements particularly when there is a ready source of sites to meet the standard method. To put the matter another way, the authorities have added 77 dwellings to the annual requirement to avoid the need to plan for an additional 5,922 homes over the plan period. In the context of the Government’s agenda for house building the proposed requirement is not sound. Indeed, the Central Lancashire Housing Study at Preferred Options stage stated that since 2001 there were on average 1,423 net additions to the dwelling stock per annum in Central Lancashire. Figure 3 of the updated Central Lancashire Housing Study (HO9) shows annual delivery since 2013.

**Table 3 Dwelling completion rates in Central Lancashire 2013-2024**

Authority	2013 / 2014	2014 / 2015	2015 / 2016	2016 / 2017	2017 / 2018	2018 / 2019	2019 / 2020	2020 / 2021	2021 / 2022	2022 / 2023	2023 / 2024
Preston	142	488	282	791	634	785	828	828	1,064	1,405	1,630
South Ribble	346	486	371	237	312	437	412	424	513	701	580
Chorley	582	723	597	517	661	573	640	306	228	309	291
<b>Central Lancashire Total</b>	<b>1,070</b>	<b>1,697</b>	<b>1,250</b>	<b>1,545</b>	<b>1,607</b>	<b>1,795</b>	<b>1,880</b>	<b>1,558</b>	<b>1,805</b>	<b>2,415</b>	<b>2,501</b>

Source: Council Authority Monitoring Reports NB: Single figure reported for 2019-2021, therefore 2019/2020 and 2020/2021 figures for Preston are averaged across the two years.

1.18 The 10 year average is 1,650dpa and the 5 year average is 1,920dpa. It is clear that since 2013/14 that Central Lancashire has proved that it can deliver a high level of net additions and the proposed requirement is a suppression of what the market can deliver.

1.19 Paragraph 237 of the Framework states:

*“Those local plans that reach Regulation 19 (pre-submission stage) on or before 12 March 2025 and whose draft housing requirement meets less than 80% of local housing need should proceed to examination within a maximum of 18 months from 12 December 2024, or 24 months of that date if the plan has to return to the Regulation 18 stage.”*

- 1.20 There were meetings of the Central Lancashire Joint Advisory Committee in September and December 2024. In the September 2024 meeting members were advised that:

*“Concerning housing evidence, Members’ attention was drawn to several pieces of work to assess housing need that should be finalised in the coming months. The current proposal was to proceed and plan for above the standard method figure as had been included within the Regulation 18 Preferred Options consultation carried out in 2022.”*

- 1.21 The only matter on the December public agenda for the Joint Advisory Committee was the Central Lancashire Core Strategy Monitoring Report. However, under Exclusion of Press and Public the minutes state:

**68 Exclusion of Press and Public**

**Resolved** - That the public be excluded from this meeting during consideration of the following items of business on the grounds that there is likely to be disclosure of exempt information which is described in the paragraphs of Schedule 12A to the Local Government Act 1972 which are specified against the heading to each item, and that in all the circumstances of the case the public interest in maintaining the exemption outweighs the public interest in disclosing it.

**69 Local Plan**

Central Lancashire Strategic Planning Joint Advisory Committee Monday, 16 December 2024

Ms Zoe Whiteside, Service Lead Spatial Planning (Chorley Council) and Mrs Carolyn Williams, Planning Policy Manager (Preston City Council) provided an update on the progress of the Central Lancashire Local Plan.

**Resolved** – that Committee noted the presentation.

- 1.22 The Central Lancashire Housing Study Update (HO9) is dated December 2024 and recommended an employment-led requirement of 1,237 dwellings. However, due to the exclusion of the press and public it is not known what the Joint Committee considered. However, public reports were taken to the Full Councils of the three authorities in late January 2025. These had the uplift of 77 dwellings in Policy HS1.
- 1.23 It is therefore not on the public record of when it was agreed that the additional 77 homes would be applied but we consider it was after the publication of the Framework when the

transitional arrangements were set out. This reinforces our concerns that the requirement in HS1 is arbitrary to avoid addressing paragraph 237 and is not sound.

- 1.24 We do not consider the Government, when setting the transitional arrangements, envisaged a working scenario whereby an authority would deliberately change the requirement to be exactly at 80%. It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in need who will be let down by a failure to deliver enough homes. A failure to deliver enough homes would also have wider consequences for economic growth in the area.

### Early Review

- 1.25 There is no provision in the Plan for an early review. Paragraph 4.21 states:

*“4.21 Each Council will monitor delivery rates within their area annually in accordance with a published trajectory to ensure delivery rates are maintained. A review of policy HS1 will be undertaken jointly by the three Councils no less than every five years to ensure it is up-to-date and meets the requirements of national policy.”*

- 1.26 However, paragraph 34 of the NPPF states:

*“Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”*

- 1.27 We consider that the 20% increase between the requirement in HS1 and the standard method is a significant change which justifies an early review to be prepared in order to address the shortfall in housing need if the Examination Inspector considers the requirement set out at Regulation 19 is sound.

### Conclusions

- 1.28 The circumstances in Central Lancashire provide clear justification for a higher housing need figure than the standard method as well as an extension to the plan period to at least 2042.

## 2 Policy HS1 Distribution of Housing Requirement

2.1 A breakdown of the requirement between the constituent authorities is provided in Policy HS1 which is as follows.

- a) 6,012 homes in the Chorley Council area (334 dwellings per annum)
- b) 9,360 homes in the Preston City Council area (520 dwellings per annum)
- c) 8,280 homes in the South Ribble Borough Council area (460 dwellings per annum)

2.2 The above figures differ from those in the Central Lancashire Housing Study as the average requirement for each authority is:

- 410 dwellings for Chorley;
- 441 dwellings for Preston; and,
- 386 dwellings for South Ribble.

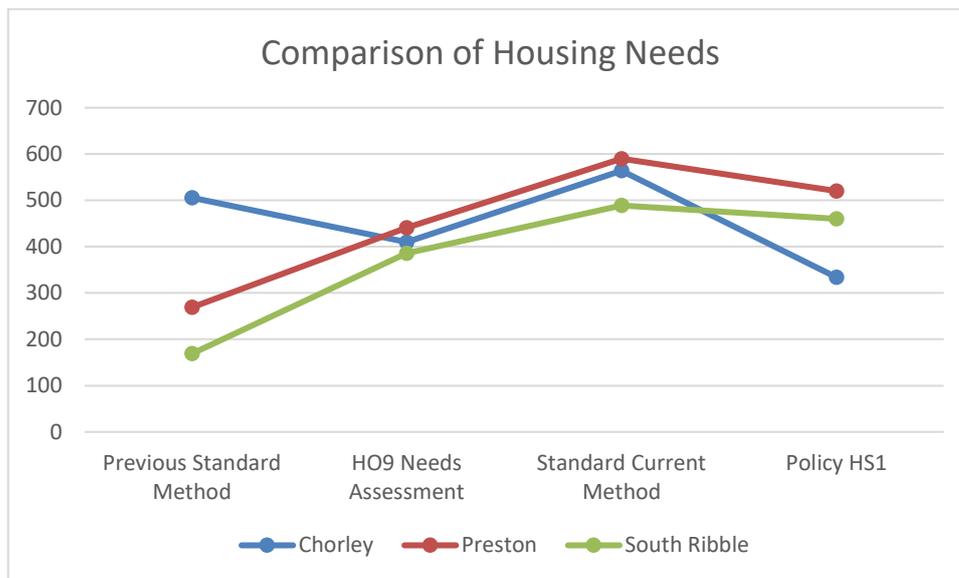
2.3 Under the new standard method, the requirement for each authority is:

- 564 dwellings for Chorley;
- 590 dwellings for Preston; and,
- 489 dwellings for South Ribble.

2.4 Whilst we accept linkages between the authorities, the evidence base sets out the reason for the distribution which is set out in paragraph 5.2 of Housing and Employment Allocations: Site Selection Process (HO16). It states:

*“5.2 Chorley had unmet need against the housing requirement set out in the Housing Study however Preston and South Ribble were able to meet this unmet need therefore a redistribution of the Housing Study requirements was applied. As such Green Belt release in Chorley was not required and could not be justified.”*

2.5 Therefore, the sole reason is that the change in distribution is so that Green Belt release was not required. This is contrary to the housing need evidence for the Plan and the graph below shows the various need figures for each authority.



2.6 As can be seen for Chorley the requirement in HS1 is below each of the other three figures for housing need. Given that the increase in the requirement in HS1 is for economic growth as well as to meet the transitional arrangements, we consider that the reduction applied to Chorley and the increase to South Ribble should be altered so that the outcome of the Central Lancashire Housing Study is applied.

### Housing Trajectory

2.7 Paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development. For plan-making this means that:

*“a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

*b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 2.8 The housing trajectory projected to deliver 25,579 dwellings in the plan period against the housing requirement of 23,652. This equates to an additional supply of 1,927 which equates to an allowance of 9%.
- 2.9 Our representation relates to the need for a greater supply to meet the requirement. This is because a flexibility allowance is required to respond to changing circumstances, i.e. slippage in the delivery of housing from strategic sites, as required by the Framework. As it stands, any delay or non-implementation of a number of sites would mean the minimum requirement is not met with serious implications in terms of the failure to meet the identified housing need.
- 2.10 Therefore, notwithstanding our objections to Policy HS1, insufficient land has been allocated to meet the requirement of 23,652 dwellings. On this basis the plan will fail to bring forward sufficient land to address its objectively assessed needs over the plan period and is therefore in conflict with national policy. Further sites must be identified to not only meet the needs, but also provide sufficient flexibility in the event that some allocated sites do not come forward or deliver less than planned for.
- 2.11 We consider that there should be a buffer of at least 20% which is based on the Local Plans Expert Group report to the Communities Secretary and to the Minister of Housing and Planning in March 2016. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework.
- 2.12 We consider that the above key points are broadly applicable to Central Lancashire and the Plan must provide sufficient flexibility in the housing land supply and there is a need to release additional deliverable sites to provide a five-year housing land supply and in the plan period. Even if there were to be a degree of over-provision, there would be wider benefits of providing a level of housing in excess of the minimum requirement, namely improving affordability and meeting affordable housing needs.

### 3 Policy HS2, HS3 and HS4 (Housing Allocations)

- 3.1 We are concerned that the site assessment work has been undertaken at a very high level without proper regard to the test of deliverability within the Framework. For example, site HS2.1 (North of Bonds Lane, Adlington) has been allocated for 92 dwellings. The Strategic Housing and Economic Land Availability Assessment (SHELAA) dated January 2025 assesses the site as suitable, available and achievable with all identified constraints likely to be mitigated.
- 3.2 The SHELAA identifies the site has constraints from highways/transport and flood risk. Our assessment of this site is that there are significant access constraints to obtaining the level of housing sought by the allocation. From the west, via the site with planning permission for 25 dwellings, Carrington Road has very limited capacity due to its narrow width (reducing to 7.8 metres in parts) and the effect of on-street parking. To the south, access from the site to Bonds Lane is impeded by several garages, sheds and allotments which look to be under private legal tenancy or ownership arrangements which have been in place for at least 25 years. Bonds Lane itself has a narrow pinch point which would prevent the standard provision of a 5.5 metre road and 2 metre footways on each side. It is therefore unclear whether the promoters of the site have demonstrated that an access is achievable nor whether the LPA have considered this properly to be able to propose the site for allocation.
- 3.3 In addition, the SHELAA confirmed the site is at risk from reservoir flooding and there is significant risk from surface water in the longer term. Access into the site would cross land at risk of flood. PPG requires that sites such as this will be required to undertake a sequential test. It is unclear whether the LPA have undertaken a sequential test to determine whether all of the allocations are at lowest risk of flooding or that suitable alternatives have been considered.
- 3.4 We have concerns that all of the allocations set out in Policy HS2, HS3 and HS4 have been properly assessed by sufficient evidence in terms of deliverability to meet the definition set out in NPPF.

## 4 Policy EN18: Areas of Separation

- 4.1 It is unclear why the policy area between Preston and Broughton has not been reviewed to take account of recent development and planning permissions. As the Local Plan covers the period 2023-2041, it should take account of development which has been built out or has secured planning permission during this period prior to adoption.
- 4.2 In particular, land west of Garstang Road, Broughton, gained planning consent at appeal for up to 51 dwellings in April 2024 (application ref 06/2023/0030, appeal ref APP/N2345/W/23/3330709) but is not shown within the settlement boundary of Broughton. The policy area should be updated to reflect this change

