

Central Lancashire Local Plan 2023-2041

Response to Inspector's Matters, Issues and Questions On behalf of Northern Trust Land Ltd

Matter 3 'The Housing Requirement'

1. De Pol Associates is instructed by Northern Trust Land Ltd to submit a hearing statement in response to Matter 3 of the Inspector's Matters, Issues and Questions (ID03). However Northern Trust are also part of a consortium with Story Homes, Wain Homes, Taylor Wimpy and Persimmon Homes who have instructed Stantec to submit a hearing statement in relation to this matter. To avoid repetition De Pol Associates' hearing statement focuses solely on question 3.2.

Q3.2 How were the housing requirements of each authority arrived at? Will the proposed requirements adequately address the needs of each authority? Is the Plan sufficiently clear in relation to how a failure to supply housing in one authority will impact upon the other two authorities in relation to five year housing land supply?

2. De Pol Associates seek to rely on the representation submitted to Policy HS1 at the Regulation 19 stage, although a summary of the key points raised therein is provided below.
3. Irrespective of wider representations being made to the overall housing requirement in Central Lancashire the Councils do not dispute that some of Chorley Borough's housing need is being redirected to Preston and South Ribble. The proposed housing requirement for Chorley in Policy HS1 does not meet the needs of Chorley Borough. Indeed it comprises just 66% of its LHN using the NPPF23 standard method, just 82% of its need based on the Council's alternative employment-led assessment and 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. This equates to a significant amount of Chorley's identified housing need, including affordable housing need, being delivered away from the Borough.



4. The explanatory text to policy HS1 states in paragraph 4.15 that the Local Plan 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 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 Council'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.
5. It is evident that the redistribution of Chorley's housing need to Preston and South Ribble is primarily due to a desire to avoid reviewing Green Belt boundaries in Chorley. The Housing and Employment Allocations: Site Selection Process (2025) confirms 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.
6. It is not considered that redistributing this amount of housing need away from Chorley 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 assisting safeguarding countryside from encroachment, the importance of which is somewhat reduced given that the result of redistributing land away from Chorley is still the extension of settlements into open countryside. There are also other non Green Belt allocations in Chorley such as proposed allocation HS2.10 which has been unnecessarily reduced in size and could be increased to help meet some of this need within the Borough.
7. 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.

8. Furthermore, policy HS1 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. 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). There is no justification to step Chorley's housing requirement in this manner.