

Central Lancashire Local Plan Regulation 19 Consultation

Representations by PWA Planning

April 2025



/1 INTRODUCTION

- 1.1. PWA Planning ('PWA') is retained by various clients and separate submissions to the Central Lancashire Regulation 19 consultation which are made under separate cover on behalf of these individual clients. In addition, PWA also wishes to make appropriate representations on its own behalf, as a directly interested party, part of whose work is closely linked to the policies of the development plan for Central Lancashire.
- 1.2. PWA is a planning consultancy based within the Central Lancashire area and which has dealt with many planning applications and continues to have a close involvement with the development plan and development management systems across the three local authority areas. PWA is therefore able to offer comments on the emerging plan which flow from extensive, first-hand experience of operating in the Central Lancashire area and hence a close working knowledge of current development plan documents.
- 1.3. Please then accept these representations on behalf of PWA Planning Limited.
- 1.4. PWA can be contacted via email using info@pwaplanning.co.uk
- 1.5. The postal address is as shown below:

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/2 SPATIAL VISION FOR CENTRAL LANCASHIRE

- 2.1. PWA agrees with and broadly supports the vision for sustainable growth outlined in the Plan. However, the vision is not supported by the land use allocations which are contained within the Plan, either in terms of quantum of development which will be delivered or the spatial location of the proposed allocations.
- 2.2. The plan must go further in addressing the region's housing shortfall, ensuring that policies actively promote housing delivery rather than restrict it.
- 2.3. This is particularly relevant given that the authorities are seeking to take advantage of the transitional provisions provided at Annex 1 Paragraph 234(a) of the Framework and so do not propose to meet the full local housing needs and seeks examination of the plan against the requirements of the previous Framework. It is acknowledged that under these provisions, the housing requirement must be no less than 80% of local housing need. The plan indicates a housing requirement which meets these provisions. The plan needs to be able to demonstrate that it then makes sufficient land use allocations to ensure that these requirements are achieved. Indeed, when the housing requirement is below the actual need, it is even more crucial that the proposed land use allocations included in the draft plan have been fully assessed for deliverability. The loss of even a modest number of sites would mean that actual delivery would likely fall well below 80% of local housing need and thus further compound the lack of supply of new homes.
- 2.4. PWA is aware that some of the sites proposed for allocation are constrained by access and other technical / ownership issues which will likely prevent development. The degree of rigour of the allocation process, particularly in considering the technical constraints, appears to be limited. This suggests that the authorities will be unable to meet the required 80% detailed within the plan which brings clear questions as to its soundness. Planning for the bare minimum is neither in the best interests of Central Lancashire, nor does it align with the NPPF which seeks to boost the supply of housing.
- 2.5. In our opinion additional land use allocations, particularly for new housing, are required to ensure the plan remains sound and can ensure delivery of at least 80% of the local housing need is achieved in housing within the Local Plan area.
- 2.6. PWA made representations on the Issues and Options Consultation and noted that the spatial vision did not prioritise **sustainable growth** as a key element. Whilst it is



acknowledged that the Draft Plan references growth there are inconsistencies in how it is emphasised and does not fully embrace it particularly in relation to housing.

- 2.7. The Plan supports economic growth and employment, particularly in relation to town centres, strategic employment sites, and investment in infrastructure. However, this is not always clearly linked to the need for corresponding housing growth. The economic projections published as part of the evidence base for the plan indicate a much higher level of housing should be planned for, particularly when you factor in the National Cyber Force HQ development. These alone indicate a greater level of housing should be planned for, asides for the questions on the deliverability of some of the sites the authorities are currently relying on within the plan period.
- 2.8. The Plan promotes "balanced growth," but this concept appears to be used in a way that **constrains housing delivery** rather than fully addressing demand. It prioritises development in existing urban areas but does not propose any significant new allocations outside these locations. This is particularly concerning in the context of Chorley, which does not provide any strategic allocation, does not seek to allocate sites in its smaller sustainable settlements, and is currently planning for a much-reduced number of dwellings by comparison with the number identified in the local housing need for the authority.
- 2.9. Moreover, the lack of a full Green Belt review and the failure to allocate enough new housing sites suggest that growth is being **constrained rather than maximised**. This approach conflicts with current and previous versions of the Framework.
- 2.10. The plan promotes sustainable development, with housing growth in locations where trips can be made through sustainable modes of transport. Paragraph 2.2 and 2.9 recognise this, particularly in light of the role the new Local Plan can have in achieving climate resilience at a local level. However, it is questionable as to whether the current distribution of development achieves this. Little attention has been paid to smaller settlements which often have a variety of services of facilities within them, where suitable allocations would allow future residents to access such facilities and services generally on foot, in a more sustainable manner than some of the larger strategic sites the authorities are relying upon.



/3 STRATEGIC OBJECTIVES

- 3.1 Strategic Objective 3 'Sustainable Communities' should be reworded to ensure that the key focus is around ensuring that the policies of the plan help to deliver a sufficient supply of homes and to support the Government's objective of significantly boosting the supply of homes (NPPF 2024 Para 61). The objective should expressly indicate a desire to boost the supply of new homes, as a clearer indication of the Councils' intentions to support economic growth and ensure adequate homes are available to meet all needs. The objective should be reworded to include:

"To create healthy, vibrant, safe and sustainable communities, with a diverse range of housing and to take decisions which help to boost the supply of sufficient new homes to ensure the needs of all sections of the community are adequately met."

- 3.2 The objective must reflect the urgent need to increase supply in order to meet identified local need and prevent the consequences of under delivery, such as the application of the presumption in favour of sustainable development.
- 3.3 Strategic Objective 4 (Economic Prosperity) should be reworded to clearly link economic success to a sufficient housing supply:

"To provide a range of employment and economic growth opportunities in sustainable locations, ensuring that housing supply supports workforce expansion and business investment. Promoting Central Lancashire as the economic centre for Lancashire, protecting and enhancing Preston City Centre's role as Lancashire's key shopping, leisure, tourism, and cultural destination while recognising its strategic importance within the wider region. Growth in employment must be matched by a sufficient and diverse housing supply to attract and retain skilled workers, reduce commuting pressures, and create a sustainable local economy. Prioritising building on the infrastructure improvements within City Deal, delivering enhanced digital connectivity, attracting inward investment, and delivering community wealth building while ensuring housing and economic development progress in tandem to support long-term prosperity."



- 3.4 This revision should ensure that economic growth is not seen in isolation but instead emphasises that economic growth is intrinsically linked to housing provision, ensuring both develop in tandem as key drivers of prosperity. This is particularly pertinent given the growth forecasts anticipated by the economic modelling within the evidence supporting the Draft Plan.
- 3.5 Strategic Objective 9 'Natural Environment' needs to be reworded to ensure that the conservation and enhancement of the natural environment is not seen to be at odds with the need to deliver much needed development. The objective needs to balance the need to deliver new development, which in most cases (most of the greenfield land use allocations) will inevitably involve some landscape impact or loss of greenspace. The key is to ensure that such losses are adequately mitigated and where possible opportunities for biodiversity gains are grasped. It is suggested that the wording be amended to include:
- "To properly balance the conservation and enhancement of the natural environment including designated and un-designated landscapes and biodiversity, with the need to ensure that appropriate development and economic growth can occur"**
- 3.6 Strategic Objective 9 (Natural Environment) should be revised to ensure that Green Belt protection does not hinder necessary development. Green Belt protection should be considered alongside the need for sustainable growth, ensuring that necessary development is not unduly restricted where it can contribute to housing, economic prosperity, and well-planned communities while maintaining environmental quality. This is particularly important given no comprehensive Green Belt review has been undertaken to address the shortfall of housing in Chorley, but also the likely requirement of additional allocations across the authorities.



/4 SPATIAL STRATEGY - HOUSING GROWTH AND DISTRIBUTION

- 4.1 PWA feels the spatial strategy does not go far enough in supporting growth. Despite acknowledging the need for housing, the plan includes a housing requirement which is around 80% of the local housing need and hence then allocates land to meet this requirement. This approach limits opportunities for both economic expansion and housing affordability. As it stands there is likely to be a significant under-provision of deliverable sites in Chorley, and a lack of strategic flexibility to meet future demand.
- 4.2 Not only does the Plan not align with the revised NPPF 2024, which the transitional provisions allow for, it fails to meet the objectives of significantly boosting the supply of housing delivery, which were enshrined in the earlier version of the Framework. **Policy SS1** (Development Patterns) fails to allocate sufficient land to meet housing needs in full, instead relying on previously allocated sites with no substantial new allocations. The spatial strategy does not provide flexibility should existing allocations fail to deliver, increasing the risk of housing shortages. This inflexibility directly is particularly important given the over reliance on a limited number of large sites, particularly in Preston and South Ribble, without providing a sufficient contingency.
- 4.3 The spatial strategy is unbalanced, directing most growth to North West Preston. This results in an over-reliance on North West Preston and Bartle while failing to bring forward significant new allocations elsewhere. The overconcentration of housing in this one area can create significant issues including infrastructure overload, imbalanced economic growth, housing market distortion and environmental and social impacts. To truly support growth, additional housing sites should be identified across all three local authorities, ensuring flexibility in supply. The Plan's narrow focus misses opportunities for sustainable growth including housing led regeneration in other towns. Chorley and South Ribble have safeguarded land that could accommodate housing.
- 4.4 The NPPF 2024 clarifies that Green Belt boundaries can be reviewed where housing needs cannot otherwise be met. Notwithstanding the transitional provisions, it is considered a significant missed opportunity that the draft plan does not undertake a proper Green Belt review, which limits opportunities for sustainable development and fails to explore all reasonable options for meeting housing needs. **Policy SS2** (Settlement Hierarchy) places too much reliance on urban areas like North West Preston while failing to consider



sustainable Green Belt releases that could better distribute growth. This omission is at odds with Chorley's inability to meet its own local housing need requirements.

- 4.5 Representations made by PWA previously raised the comment that all parts of the main urban areas should be within Tier 1 and suggested deletion of Tier 2. It is noted that Policy SS2 retains Tier 2 as a Key Service Centre. It is recommended that Tier 2 is merged into Tier 1 to reflect the significant urban function of these settlements. Furthermore, the differentiation between Tier 4 (Rural Local Service Centres) and Tier 5 (Smaller Rural Villages and Hamlets) remains unclear, as both tiers have limited growth potential but are treated differently. It is suggested there is still a need for explicit support for sustainable development in smaller settlements.
- 4.6 The following points are recommended to ensure compliance with even the old Framework.
- 4.7 Housing allocations are increased to ensure that the constrained housing requirement is fully achieved, ensuring a considerable buffer for under-delivery.
- 4.8 Conduct a full Green Belt review. As is now mandated by NPPF 2024, the previous version of the Framework did not expressly exclude the option to review Green Belt and given the transitional period in which this plan is being advanced, the lack of a review of Green Belt is a significant omission, limiting the plans capacity to properly deliver sustainable development.
- 4.9 Distribute growth more evenly across all settlements, ensuring a mix of urban regeneration, including Green Belt adjustments where necessary, and new allocations in sustainable locations.
- 4.10 Reassess Policies SS1 and SS2 to ensure they facilitate, rather than constrain, housing delivery in line with national objectives. These actions are essential in light of what is likely to be a shortfall in meeting the minimum 80% of local housing need for the authorities.



/5 LACK OF GREEN BELT REVIEW

- 5.1 A true growth strategy would include a comprehensive Green Belt review. The failure to consider Green Belt release is a major flaw in the Plan, as it prevents sustainable development from taking place in locations where demand is highest.
- 5.2 Although the plan seeks to proceed under the transitional provisions provided for in NPPF 2024, and hence to see the plan examined against the policies of the old Framework, it seems apparent that, during this transitional period, every opportunity should be taken to review the constraints to development. Whilst paragraphs 145 – 147 of the old Framework did not mandate the review and release of Green Belt, it did not prevent such assessments and indeed it allowed for this to occur where exceptional circumstances existed. In our opinion such exceptional circumstances exist, and include
- The use of transitional provisions to constrain the housing requirement to only 80% of local housing need;
 - The lack of rigour in assessing the delivery of allocated sites to meet the constrained need;
 - The need to ensure that the land use allocations flow from a clear spatial strategy, rather than representing any available site regardless of spatial strategy and sustainability;
 - The lack of any alternative to increase supply, should the preset strategy prove unable to deliver the number of homes needed.
- 5.3 It is our view that the lack of a full Green Belt review is a major flaw in the plan and we consider that such a review is both justified and would meet the exceptional circumstances tests set out in Paragraphs 144 to 146 of the old Framework. This would help to ensure a more sustainable pattern of future development and that each of the authority's housing requirements can more closely align with actual needs, rather than being constrained by the limitations of site availability.



/6 BALANCED HOUSING GROWTH MARKET (CHAPTER 4)

Policy HS1 Scale of Housing Growth and Distribution of Housing Requirements

- 6.1 Policy HS1 does not align with the requirement to significantly boost housing supply in NPPF. The policy acknowledges the need for new housing but only seeks to meet 80% of the identified housing requirement, which is wholly insufficient. NPPF 62 states that local plans should meet as much housing need as possible. By not planning to fully meet local housing needs, the policy exacerbates affordability issues and limits the economic potential of Central Lancashire. Furthermore, there is no flexibility built into the policy, if existing allocations underdeliver, there is no clear mechanism to release additional sites, creating a risk of persistent undersupply.
- 6.2 The strategy employed in Policy HS1 places excessive pressure on a single area, North West Preston and Bartle. There is a danger that there could be delays in delivery if key sites in North West Preston stall and then there is no backup strategy.
- 6.3 Alternative sustainable locations, such as safeguarded land or well-connected Green Belt sites, have not been properly considered, making the plan vulnerable to under delivery.
- 6.4 It is strongly suggested that the number of housing allocations be increased to ensure that the plan is capable of delivering the minimum number of dwellings against the constrained housing requirement (80% of Local Housing Need). To achieve a certain number of dwellings requires a level of provision which exceeds the minimum requirement otherwise there is no allowance for slippage or a buffer for under delivery. In the short term, it would be more appropriate to undertake a comprehensive Green Belt review as part of the local plan process, than to simply expect that sites within the Green Belt are brought forward as windfall opportunities through the development management process. More flexibility needs to be introduced into policy HS1 by allowing additional sites to come forward if housing delivery falls short, ensuring that the supply of homes does not stagnate.
- 6.5 To be sound, Policy HS1 must be revised to increase the number of sites, particularly for housing, to ensure that the constrained housing requirement is fully achieved and to help ensure a more balanced spatial approach, and ensure flexibility in housing supply.



Policy HS5: open space and playing pitch requirements in new housing developments

- 6.6 Policy HS5 allows for financial contributions towards off-site provision where on-site space is not appropriate. It is acknowledged that this provides some flexibility, however, the policy is not clear as to when off-site contributions will be accepted. If too restrictive, it could force inefficient on-site provision where off-site contributions would be more beneficial.
- 6.7 The policy sets clear open space standards, however viability concerns may arise if these standards are applied rigidly without consideration of site constraints. There is no explicit viability clause in Policy HS5, meaning that in cases where meeting these standards could make a development unviable, there is no clear mechanism for adjustment. NPPF 58 requires planning obligations to be proportionate and viable.
- 6.8 It is recommended that Policy HS5 is reworded to explicitly include a viability assessment mechanism to adjust open space requirements where necessary and clarify when off-site contributions are acceptable.

Policy HS6: Housing Mix and Density

- 6.9 Policy HS6 does not contain an explicit viability clause for accessibility standards. If a development struggles to accommodate M4(2) or M4(3) homes due to design constraints or viability, there is no clear mechanism for flexibility.

Policy HS7: Affordable Housing

- 6.10 Policy HS7 mandates that affordable homes align with housing mix requirements in policy HS6. The proposal to specify the tenure on developments where 100% of homes are to be affordable will directly reduce the amount of affordable housing delivered and will prevent some schemes being developed at all.
- 6.11 In some cases, affordable home ownership is not viable because the cost of development is greater than the market value of the completed homes. This is often the case with apartment blocks in low value areas, developments for supported housing and schemes for older people. Where this scenario exists, the only viable tenure is rent and it is not possible



to provide the required percentage of homes for an affordable home ownership tenure. The policy as written would not allow these developments. As an example, most extra care schemes would not be possible, despite them being in need and serving a purpose that benefits a range of other sectors.

- 6.12 A number of sites that have been delivered for 100% affordable housing in Central Lancashire in recent years would not be possible with the policy as written. Most of the sites would have been secured in competition with developers of market housing. The reason that developments of this kind (100% affordable) can compete with market housebuilders is the flexibility to select the most appropriate tenures that balance a competitive land price with the tenures most in need.
- 6.13 A typical development of 100% affordable housing includes 50% for rent and 50% for shared ownership. This combination of tenures can produce a site value that can compete with market housing. A development of 75% rent and 25% shared ownership would not provide a competitive offer in most cases. This would result in a market scheme being developed instead, producing 30% affordable housing with approximately 22% of the total for rent and 8% for shared ownership. Allowing flexibility to select tenures that produce a competitive price could produce 28% more rented homes and 42% more homes for shared ownership.
- 6.14 In summary, the policy as written is likely to produce fewer affordable homes. It should be removed or replaced with a more appropriate policy based on a proper understanding of the delivery of affordable homes.

Policy HS8: Rural Exception Sites

- 6.15 The strict location criteria outlined in Policy HS8 to adjoin the settlement boundary is overly restrictive and could limit opportunities for sustainable development where well-related small rural sites exist just beyond the boundary but still offer good pedestrian links.
- 6.16 NPPF 82 allows for a small proportion of market housing to be included in Rural Exception Sites where necessary to make schemes viable. Policy HS8 does not include any reference to this, which may make delivering affordable rural housing more challenging.



6.17 Policy HS8 should include greater flexibility in site selection and a viability mechanism to ensure practical implementation.



/7 PROSPEROUS ECONOMY (CHAPTER 5)

- 7.1 Previous comments provided by PWA raised objections based upon the additional restrictions on Use Class E and the flexibility granted by the amended Use Classes Order, which allows changes within Class E without planning permission. The policy direction suggested refusal of developments based on a centre's poor health indicators was seen as an unjustified control over subcategories of Class E. There were concerns that if a centre is performing poorly, new development could be refused rather than encouraged.
- 7.2 The policies proposed in the Draft Plan do not impose a direct restriction on Use Class E changes and support a mix of uses in the centres. Whilst they do not explicitly prohibit changes within Class E, retail function is prioritised which could indirectly limit flexibility for other Class E uses.
- 7.3 While the Draft Plan maintains a focus on strengthening town centres, it still appears to limit the flexibility that was introduced by the Government's Use Class E reforms.



8/ HIGH QUALITY ENVIRONMENT (CHAPTER 7)

Policy EN1: Well Designed Places

- 8.1 PWA believe the design standards outlined in Policy EN1 are too prescriptive. EN1 requires all major residential developments to achieve a 'green light' against all Building for a Healthy Life criteria. While good design is important, requiring compliance with every criterion could be too rigid and prevent site-specific flexibility. The policy should allow some flexibility where justified rather than applying absolute standards that may not suit all developments.
- 8.2 EN1 requires "significant schemes" to provide a Masterplan, Parameter Plans, and a Design Code. The definition of "significant schemes" is unclear. Does it refer to large-scale developments (e.g. strategic sites) or any major application (10+ homes)? While masterplanning is beneficial for large-scale developments, requiring all significant schemes to prepare these documents may slow down delivery. PWA suggest masterplanning and design codes should only be required for truly large or complex developments, not smaller major applications.

Policy EN8: Trees, Woodlands, and Hedgerows

- 8.3 Policy EN8 sets out strong protections for existing green infrastructure, while also requiring enhancements and compensatory planting where trees or hedgerows are lost due to development. EN8 adopts an "overriding principle" that trees, woodlands, and hedgerows must be "retained, protected, and improved." This language suggests a near-blanket restriction on tree removal, which could create conflicts with necessary development. While tree retention is desirable, some flexibility is needed where tree loss is justified and adequately mitigated. The policy must also ensure that it does not create excessive burdens that hinder viable development.
- 8.4 The policy requires a 2:1 replacement ratio for tree loss and requires compensatory planting for hedgerow removal at an equal or greater length. The policy does not provide adequate flexibility for cases where on-site replanting is impractical. EN8 states that off-site mitigation will "only be considered in exceptional cases." There is uncertainty as to how and where off-site contributions can be delivered.



Policy EN15: Areas of Green Belt

- 8.5 The NPPF 2024 introduced greater flexibility in Green Belt policies, allowing local authorities to review Green Belt boundaries where housing needs cannot be met and providing more clarity on what constitutes appropriate development. While EN15 broadly aligns with national policy, some aspects may be too restrictive and fail to take full advantage of the flexibility provided by NPPF 2024. Although it is understood that the authorities are using the transitional provisions in the new Framework, it is difficult to reconcile policies of a new plan which in some cases will be at odds with the latest version of the Framework or PPG.
- 8.6 Policy EN15 does not address the potential for Green Belt to accommodate housing where justified. This omission conflicts with the government's objective of boosting housing supply, as policy EN15 reinforces rigid Green Belt protection without acknowledging flexibility.
- 8.7 Policy EN15 defines "limited" infilling as a maximum of 4 dwellings, which imposes a local threshold not found in either the old or the current Framework. This restriction could prevent sustainable small-scale development that aligns with local character.
- 8.8 Policy EN15 limits extensions and replacements to a 30% increase in volume (compared to the original building). The NPPF does not impose a specific volume threshold, meaning this local restriction could be unnecessarily limiting. A case-by-case approach is suggested considering factors such as visual impact and site location, rather than a fixed percentage increase. The policy should be reworded to include flexibility in assessing extensions and replacement buildings, ensuring that proposals are assessed on design impact, not just volume. Additionally, the current Central Lancs Rural Development SPD allows for extensions up to 50%. It is not clear why this is now being proposed to be reduced to 30%. As detailed above, assessments should be made on a case by case basis.
- 8.9 Policy EN15 requires a Green Belt Assessment for all PDL redevelopment proposals, even when they meet NPPF 2024 Paragraph 154(g). This adds an additional layer of assessment not explicitly required by current national policy, potentially delaying or discouraging brownfield redevelopment in the Green Belt.



Policy EN16: Protection of Agricultural Land

- 8.10 EN16 places stringent requirements on all developments over 0.5 hectares despite there not being a specific site size threshold set in the NPPF for BMV land protection. It is suggested that the threshold is raised when requiring an Agricultural Land Classification Report to a more proportionate level (e.g. 2 hectares or more, rather than 0.5 hectares) to avoid placing excessive burdens on minor development proposals.

Policy EN17: Development in the Open Countryside

- 8.11 Our previous comments on the draft policy direction raised concerns about restrictions on development in the open countryside. The proposed approach was too restrictive, applying a blanket policy limiting most types of development outside settlement boundaries and failed to allow for other justified development (e.g. entry-level exception sites).
- 8.12 Policy EN17 remains a restrictive closed list policy limiting development to a specific set of exceptions and does not allow for other types of sustainable development such as entry-level exception sites as supported by NPPF 82, market-led rural housing development where it meets sustainability objectives, sustainable rural employment opportunities or innovation hubs beyond agriculture or other site-specific opportunities where the benefits outweigh the harm.
- 8.13 NPPF 2024 (as well as previous versions) does not require the countryside to be protected for its own sake, but policy EN17 still applies a high level of protection without distinguishing between designated valued landscapes (which deserve stronger protection) and general countryside areas, which can accommodate sustainable development. In this regard, Policy EN17 applies an approach that is more restrictive than national Green Belt policy, which is excessive. As a simple example, infill is allowed for within Green Belt locations but is no longer explicitly listed as an exception under Policy EN17.
- 8.14 Policy EN17 states that all proposals must not "have a harmful effect on the character of the countryside" which imposes a highly subjective test and is too rigid potentially blocking appropriate and well-designed development.



/9 CLIMATE CHANGE AND SUSTAINABLE ENERGY (CHAPTER 8)

- 9.1 PWA made previous representations that climate policies should encourage rather than mandate specific mechanisms for achieving net zero and policies should allow flexibility as rigid energy efficiency and sustainability requirements may become outdated.
- 9.2 **Policy CC1** (Climate Change) introduces specific targets for net zero emissions and requires whole-life carbon assessments, which are considered too prescriptive and overly rigid. PWA believe, as a practice that regularly experience these issues, there is a risk of requiring complex submissions alongside planning applications and there is no capacity for these documents to be properly considered, reviewed and approved as part of the planning process. Such efforts become little more than a tick-box exercise for applicants and the planning authorities and the outcomes are often in considerable doubt.
- 9.3 It is of course entirely appropriate for the Councils to aspire to achieving 'net zero' at the earliest opportunity and to encourage this to occur through decision making powers. However if the policies are to have practical and positive effects, it needs to be realistic and to ensure that requirements can be practically achieved through the current development management regime.



/10 CONCLUSION

10.1 PWA Planning supports the overall vision for sustainable growth in the Central Lancashire Local Plan but remains concerned that key policies fail to fully align with the objectives of the NPPF 2024, particularly regarding housing growth, Green Belt release and economic flexibility.

10.2 To ensure the Local Plan is sound, justified, and deliverable, the following key changes should be made:

- Increase the number of housing land use allocations to ensure that the housing requirement in the plan can be fully met and to allow flexibility for additional sites if under-delivery occurs.
- Consider Green Belt review to identify sustainable growth opportunities.
- Amend policies to allow flexibility in infrastructure contributions, active travel, and Use Class E economic development.
- Revise overly prescriptive design and climate policies to ensure practical implementation without creating development barriers.

10.3 The current draft of the Local Plan is too restrictive in several key areas, risking development delays and economic stagnation. By adopting a more flexible and growth-oriented approach, the Plan can deliver sustainable housing, infrastructure, and economic expansion while maintaining environmental protections.



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