



# **Central Lancashire Local Plan 2023-2041**

## **Statement of Common Ground Between the Central Lancashire Authorities (Chorley Council, Preston City Council and South Ribble Borough Council) and the Environment Agency**

June 2025

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## 1. Introduction

- 1.1 This document is a Statement of Common Ground (SoCG) between the Central Lancashire Authorities and the Environment Agency (EA) and is required to support the preparation of the Central Lancashire Local Plan.
- 1.2 The SoCG has been prepared to comply with the National Planning Policy Framework (NPPF) requirements. Paragraph 25 of the NPPF<sup>1</sup> states that “Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities.’ Para 28 of NPPF further states that “strategic policy-making authorities should prepare and maintain one or more statement of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these”.
- 1.3 This SoCG deals with matters relating to the Central Lancashire Level 2 Strategic Flood Risk Assessment and discussion with the Environment Agency regarding aligning this with updates to the Environment Agency Flood Map for Planning that were released in March 2025.

## 2. Background of Central Lancashire

- 2.1 Under Section 28 of the Planning and Compulsory Purchase Act 2004, two or more local authorities can prepare a joint local plan by reaching an agreement. It is an effective way in addressing cross-boundary issues and offering a more strategic planning framework across the joint plan area.
- 2.2 Central Lancashire covers the geographical areas of Preston City Council, Chorley Borough Council and South Ribble Borough Council, which functions as one integrated local economy and commuting area. It is a single housing market area with high levels of self-containment, or families moving within the area. It is therefore appropriate to work strategically in collaboration to ensure our policy is joined up and complementary.
- 2.3 The joint working on planning-related matters was begun in 2008, when the three Central Lancashire Authorities (CLAs) came together and produced a Central Lancashire Core Strategy. The CLAs collaborated to produce the Local Development Framework and adopted the first Core Strategy in July 2012, which

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<sup>1</sup> NPPF Version December 2024

sets out the strategic planning policies for Central Lancashire. In 2018, a review of the Core Strategy and individual local plans was begun with a view to delivering a single Central Lancashire Local Plan (CLLP), reflecting both the shared strategic policy objectives and more detailed non-strategic policies.

- 2.4 A Central Lancashire Strategic Planning Joint Advisory Committee has been established, made-up of elected members from each authority. This Committee has the responsibility to consider proposals, open them up to debate and move to endorse or challenge them at their discretion. A Central Lancashire Local Plan Team (Local Plan Team) has been created and jointly funded by the CLAs specifically to undertake the work required to deliver the review of the local plan. The team is accountable to all three local authorities, reporting back to each home team and guiding the process forward.

### **3. Joint Working: Central Lancashire Authorities and the Environment Agency**

#### **SFRA Level 2 updates**

- 3.1 During the preparation of the Central Lancashire Local Plan, the Local Plan Team have engaged with the Environment Agency on development of the plan and the EA have provided detailed comments during consultation stages, as well as in agreeing the content of specific policies on flood risk. In addition, the EA have also been involved in the working with the Councils on the development of the Strategic Flood Risk Assessment.
- 3.2 Through this work, the EA indicated that the new Environment Agency National Flood Model and associated updates to the Flood Map would be published in Spring 2025. It was agreed that should the new mapping result in changes to flood risk extents that have been modelled through the Level 2 SFRA's for sites being considered for allocation, the Level 2 SFRA reports would be looked at and agreement with EA reached to ensure complete assessment of flood risk is undertaken prior to allocation of proposed sites.
- 3.3 The EA and the Councils agreed in February 2025 that, at the time of preparing the Level 2 SFRA, the most up to date information had been used. It was also agreed that following release of the new mapping in Spring 2025, the Central Lancashire Authorities would review , with assistance from the EA , those sites which had been assessed in the Level 2 assessments against this new mapping to identify if new mapping indicates a change to the extent of flood risk on that site.

3.4 The EA undertook an early review of the flood risk mapping, indicating overall minor changes to the flood risk and provided details for those site for which an update was required. The scope of works was agreed with the EA and to be undertaken by our consultants JBA. The findings of the updated mapping did not identify any “in principle” flood risk concerns or rule out any sites progressing to allocation. A list of those sites for which the Level 2 update is required is set out in Appendix 1.

### **Policy Comments**

3.5 The EA, through their representation on the Local Plan at Publication, provided some wording changes that could be added to following policies to aid reading and improve clarity.

3.6 The changes proposed where to policies with Chapter 7 High Quality Environment, specifically the following policies.

EN6      Biodiversity Net Gain  
EN10     Development and Flood Risk  
EN14     Environmental Quality

3.7 Comments were also received on policy EN10 by the Local Lead Flood Authority and United Utilities. The councils have therefore worked with the three bodies to consider proposed changes to improve readability of the policy and address the points made. These are to be put to the Inspector as proposed changes which could be considered during the hearing sessions.

3.8 Factual changes were also proposed to Policy EN9 Species Protection, these have been accepted.

3.9 Representations where also made in regard to the following site allocations following the updates to flood mapping

3.10 Chorley, EC5.7 – Comments noted the change in flood mapping will affect the developable area, specifically the extent suitable for housing. The EA recommended mapping shows those parts of the allocation suitable for employment only and those for employment and housing. The changes proposed would increase the area available for employment, reducing that for housing, however the type of housing which could be delivered has not been specified and the number of units proposed could still be achieved if apartments are considered. The comments received did not affect the quantum of housing and only reflect the area of the allocation where it could be delivered,

- 3.11 Preston, HS4.4 – comment noted an area without planning permission where flood risk was considered higher and recommended a boundary change. However this area has already been noted by PCC and the site promoter Wain Homes as being incorrect and an amendment is proposed to reflect the correct boundary of land with planning permission, as such no further changes are needed.
- 3.12 South Ribble EC4.1 the EA note that this site has not been subject to a level 2 SFRA and has areas of medium flood risk on site. Whilst it is noted the development is for less vulnerable uses, the EA requested the following wording be considered for this site “Proposals for any future scheme shall be accompanied by a Flood Risk Assessment that demonstrates the development would be safe without increasing flood risk elsewhere and that no inappropriate development will be in areas at a high risk of flooding or in the functional floodplain.”
- 3.13 The above change is agreed and proposed as a modification.

#### **Previous agreed position on modelling prior to Publication**

- 3.14 In the EA’s response to working drafts of the Level 2 SFRA prior to publication, they set out that the LPA must be clear that a site cannot be developed until the required information detailed in the SFRA on existing flood risk is ascertained. The EA where clear that they do not expect the council to undertake additional modelling work, however the SFRA was required to be clear what is expected to be addressed in a site-specific Flood Risk Assessment (FRA). It was therefore agreed that the Level 2 Flood Risk Assessment recommendations should be clear what a site-specific FRA needs to cover for each site. The below wording was added to the SFRA Level 2 Reports to reflect this.

*‘The areas of flood risk within this site cannot be developed until the required information detailed in this SFRA on existing and future flood risk is fully ascertained. This is because, at this stage, it cannot be proven that the site can remain safe for its lifetime. The site can only be allocated if all development can be directed to areas of low flood risk. Were additional, more detailed modelled information on flood risk become available through an update to the SFRA or through a site-specific FRA, that show the risk area to be lower than currently shown, more of the site could then be developed. Conversely, were the risk to be greater, any development must account for this. Flood risk should not be increased elsewhere as a result of this development.’*

- 3.15 It is agreed in respect of climate change modelling that the higher central allowance modelled flood outlines (MFO) is acceptable as the central allowance MFO are generally smaller in extent for the central allowance, therefore the key

recommendations on development will not change upon review of the central allowance. Text has been added to the Level 2 report at Publication to reflect this.

## 4. Signatories

This section sets out for each signatory organisation the name of the organisation and the name, position, and signature of that organisation's representative.

Unless otherwise stated each party listed is a full signatory to the statement

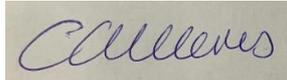
### **Central Lancashire Authorities**

#### Chorley Council



Zoe Whiteside, Head of Spatial Planning

#### Preston City Council



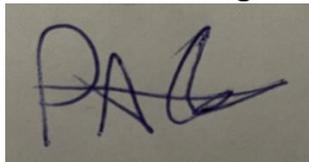
Carolyn Williams, Planning Policy Manager

#### South Ribble Borough Council



Elizabeth Thornber, Head of Planning and Enforcement

### **Environment Agency**



Philip Carter

## Appendix 1: EA list of Level 2 SFRA sites to be updated

Green = changes in extent following NaFRA2 can be referenced in updated L2SFRA to confirm no change in overall advice/conclusions OR changes affect sites with planning approval so no L2 SFRA required.

Amber = some changes to the wording/content of the plan is recommended to address the increased risk.

| Site ref | FZ2/3 pre-26/03/25? | FZ2/3 post-26/03/25? | L2 SFRA completed?                  | Commentary                                                                                                                                                                                                    |
|----------|---------------------|----------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HS2.1    | no                  | yes                  | Yes                                 | Very minor increase (FZ2 at boundary), update L2 SFRA                                                                                                                                                         |
| HS2.2    | no                  | yes                  | No (planning application submitted) | Minor increase (FZ2). No L2 SFRA, but live planning application supported by FRA and EA had no in principle objections so site can be developed                                                               |
| HS2.11   | no                  | Yes                  | Yes                                 | Minor increase (more FZ2/3), update L2 SFRA                                                                                                                                                                   |
| HS2.18   | no                  | Yes                  | No (planning approval granted)      | Minor increase (FZ2/3 along site boundary) but no L2 SFRA. Approved development avoids area of flood risk                                                                                                     |
| HS2.20   | no                  | Yes                  | No (planning approval granted)      | Minor increase (FZ2/3 along site boundary but no L2 SFRA as approved development. New mapping suggests one plot (103) potentially at risk of flooding but unable to revisit unless new application submitted. |
| HS2.25   | no                  | yes                  | Yes                                 | Minor change (more FZ2), update L2 SFRA                                                                                                                                                                       |
| HS2.35   | yes                 | yes                  | No (planning application submitted) | Minor increase (FZ2). No L2 SFRA, but live planning application supported by FRA and EA had no in principle objections so site can be developed                                                               |
| HS3.1    | Yes                 | Yes                  | Yes                                 | No change in FZ extents (wholly FZ2), update L2 SFRA to confirm.                                                                                                                                              |
| HS3.3    | no                  | yes                  | Yes                                 | Minor change (more FZ2/3), update L2 SFRA                                                                                                                                                                     |
| HS3.4    | Yes                 | Yes                  | Yes                                 | Minor change (extent of FZ2/3), update L2 SFRA                                                                                                                                                                |

| Site ref | FZ2/3 pre-26/03/25? | FZ2/3 post-26/03/25? | L2 SFRA completed?                                               | Commentary                                                                                                                                                                                                                                    |
|----------|---------------------|----------------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HS3.9    | no                  | yes                  | Yes                                                              | Minor change (more FZ2/3), update L2 SFRA                                                                                                                                                                                                     |
| HS3.19   | Yes                 | Yes                  | No                                                               | Minor reduction from FZ2/3 to FZ2 along site boundary. No L2 SFRA, but as risk limited to site boundary, development of wider site as proposed is considered acceptable                                                                       |
| HS4.2    | yes                 | yes                  | No (planning approval granted)                                   | Minor reduction in flood risk. No L2 SFRA but site under development                                                                                                                                                                          |
| HS4.4    | yes                 | yes                  | No (planning approval for part of site – not part in flood zone) | Minor increase (more FZ2). No L2 SFRA. FZ3 along river corridor, up to 30m from river. Greater risk from FZ2. Can address risk by including site in Appendix 4 to ensure flood risk is considered as key consideration in absence of L2 SFRA? |
| HS4.11   | Yes                 | Yes                  | Yes                                                              | No change in FZ extents, update L2 SFRA to confirm                                                                                                                                                                                            |
| HS4.12   | No                  | Yes                  | No                                                               | Minor increase, but site already built out in location of new risk so no need to do L2 SFRA                                                                                                                                                   |
| HS4.24   | yes                 | yes                  | No (planning approval granted)                                   | Minor increase (FZ2/3 along site boundary) but no L2 SFRA. Approved development avoids area of flood risk                                                                                                                                     |
| SS3      | no                  | yes                  | Yes                                                              | Minor increase, but site already built out in location of new risk so no need to do L2 SFRA                                                                                                                                                   |
| SS5      | no                  | yes                  | Yes                                                              | Increased risk (more FZ2/3), update L2 SFRA                                                                                                                                                                                                   |
| EC3.1    | yes                 | yes                  | yes                                                              | No change in FZ extents (FZ2), update L2 SFRA to confirm                                                                                                                                                                                      |
| EC3.4    | yes                 | yes                  | yes                                                              | Minor change (more FZ3), update SFRA                                                                                                                                                                                                          |

| Site ref | FZ2/3 pre-26/03/25? | FZ2/3 post-26/03/25? | L2 SFRA completed? | Commentary                                                                                                                                                                                                                                                                        |
|----------|---------------------|----------------------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EC4.1    | yes                 | yes                  | no                 | Increase risk (more FZ2/3). No L2 SFRA however at Appendix 5, LPA assumes 6.92ha developable (FZ1/2) in Local Plan so allocation is not assuming development in FZ3. If no development in FZ3 is anticipated, then can assume less vulnerable development is acceptable in FZ1/2. |
| EC5.3    | Yes                 | Yes                  | Yes                | No change in FZ extents, update L2 SFRA to confirm.                                                                                                                                                                                                                               |
| EC5.5    | no                  | yes                  | No                 | Minor increase (new FZ2). No L2 SFRA. Increase in FZ2 affects approx. 190m <sup>2</sup> of whole allocation – suggest including at Appendix 6 to ensure flood risk considerations are managed? EA would not object to planning application                                        |
| EC5.7    | yes                 | yes                  | Yes                | Increased risk (more FZ3). Extra 0.2 ha in FZ3, will affect yields in Local plan – only 1ha in FZ1/2 so EA may need to object to allocation based on scale of residential proposed in allocation?                                                                                 |