

EiP Hearing Statement

Central Lancashire Local Plan

Bloor Homes

Representor ID A65

Our ref 64774/03/BOC/MKR
Date 6 November 2025
To Central Lancashire Local Plan Examining Inspectors
From Bloor Homes Limited [ID: A65]

Subject Matter 1b – Overarching Matters

1.0 Introduction

- 1.1 Lichfields is instructed by Bloor Homes ('Bloor') to make representations on its behalf to the Central Lancashire Local Plan ('CLLP').
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 1b Examination in Public ('EiP') hearing sessions.
- 1.3 Separate representations have been submitted in respect of the following matters:
- Matter 2 – Spatial Strategy Policies
 - Matter 3 – The Housing Requirement
 - Matter 5 – Housing Allocations
 - Matter 6 – Housing Land Supply
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the CLLP (Representor ID A65) as well as those made on other Matters listed above. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework ('NPPF') (December 2023) and the National Planning Practice Guidance ('PPG').

2.0 Questions

Q1.11: Is the Plan period (2023 - 2041) justified, effective and consistent with national policy which requires strategic policies to look at least 15 years ahead from adoption? Should the requirements/timescales for review of the Plan be set out in policy?

- 2.1 Paragraph 22 of the NPPF is clear that strategic policies should look ahead over a minimum 15-year period from adoption. Should it be found sound at EiP, the Central Lancashire Local Plan (CLLP) is likely to be adopted in 2026. However, to comply with the minimum

15-year timeframe, it would need to be adopted before 31 March 2026. With EiP hearing sessions scheduled for January 2026, and other statutory stages of the plan-making process—including consultation on any main modifications—it is unlikely that the plan will be adopted before this date. Therefore, to comply with the minimum requirement to look ahead 15 years from adoption, the plan period would need to be extended to at least 2042.

- 2.2 Notwithstanding the above, paragraph 22 of the NPPF also states that a longer-term approach should be taken where large-scale developments, including significant extensions to settlements, form part of the strategy for the area. The CLLP contains several strategic site allocations. Some of these, such as the North West Preston/Bartle strategic site allocation, represent significant extensions to settlements which are unlikely to be completed in this Plan period given their scale. Therefore, it would not be appropriate for the CLLP to look ahead to only the minimum 15 years from adoption. The policies should be set within a longer-term vision to reflect the likely timescales for delivery of that vision, in accordance with paragraph 22 of the NPPF.
- 2.3 The requirements and timescales for reviewing the CLLP must be established in policy. Paragraph 33 of the 2023 NPPF requires that, in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, strategic policies should be reviewed to assess whether they need updating at least once every five years. However, Bloor considers that this requirement is ineffective in ensuring local plans are kept up to date, and that there remains a lack of clear guidance on what should be considered when undertaking a review of strategic policies. Paragraph 33 of the 2023 NPPF states that *“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.”* The SM3 figure for Chorley (557dpa) means that, if adopted, the CLLP would not be representative of the significantly higher LHN for the authorities. This represents a significant change in housing need which would trigger an earlier review of the plan in accordance with paragraph 33 of the 2023 NPPF.
- 2.4 Paragraph 4.21 of the CLLP Publication Version notes that a review of Policy HS1 (Scale of Housing Growth and Distribution of Housing Requirements) 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. Similarly, Bloor does not consider that this statement in paragraph 4.21 of the CLLP, which sits outside the policy text, provides clear requirements for when a review should be undertaken. This approach does not reflect Paragraph 33 of the 2023 NPPF as set out above. An earlier review should be undertaken sooner than five years in the event that the CLLP was failing and housing delivery was not being achieved.
- 2.5 Bloor considers that a policy in the CLLP establishing a clear set of triggers under which the plan should be reviewed would act as a safety net should the plan fail to deliver as anticipated. Bloor advises that the following triggers are considered for inclusion as part of an early review policy:
- 1 Housing delivery falls below 85% cumulatively of the overall Policy HS1 requirement for Central Lancashire in two consecutive annual monitoring periods. This 85% requirement corresponds to paragraph 79 of the 2023 NPPF, requiring authorities to

prepare an action plan and include a buffer of 20% to their identified supply of specific deliverable sites where delivery falls below 85% over the previous three years.

- 2 Housing delivery falls below 85% of any one of the three districts' requirements established in Policy HS1 in two consecutive annual monitoring periods.
- 3 The expected delivery trajectory of any of the strategic site allocations slips by two or more years. Whilst the Monitoring Framework for the CLLP sets a target of delivery of sites in line with housing trajectory, this should be strengthened to include a mechanism for an early review in the instance of trajectories slipping by two or more years.

- 2.6 To ensure any early review mechanism policy is effective, it must state that, should any of the triggers be met, the Councils must commence a review of the local plan within six months. If they fail to do so, the policies in the CLLP that are most important for determining planning applications for new dwellings should be deemed to be 'out of date' in accordance with paragraph 11(d) of the NPPF. In accordance with paragraph 33 of the 2023 NPPF, an earlier review should be undertaken if local housing need is expected to change significantly in the near future (i.e., with the SM3 figure).

Q1.12: What are the implications of the transitional arrangements set out in paras 234 and 235 of the NPPF (Dec 2024) for the examination of the Plan?

- 2.7 Paragraph 234 of the NPPF states that where a local plan has reached Regulation 19 stage on or before 12 March 2025, and the draft housing requirement meets at least 80% of local housing need, the plan does not need to be examined under the December 2024 version of the NPPF.
- 2.8 The Regulation 19 consultation on the CLLP commenced on 24 February 2025. The housing requirement was increased by 77 dwellings per annum (dpa) to 1,314 dpa, equating precisely to 80% of the standard methodology figure at that time of 1,643 dpa across the three districts. The Councils have been transparent in acknowledging at paragraph 4.19 of the CLLP that this revision was made solely to comply with the transitional arrangements set out in paragraph 234 of the NPPF.
- 2.9 Notwithstanding Bloor's comments in the Matter 3 statement regarding the derivation of the housing requirement, it is important to note that the local housing need figures for the three districts have since been updated. The revised figures—based on updated dwelling stock and affordability ratios—are now 557 dpa for Chorley, 632 dpa for Preston, and 498 dpa for South Ribble, totalling 1,687 dpa. The CLLP's annual housing target of 1,314 dpa now represents only 77.9% of this figure, falling short of the minimum 80% threshold specified in paragraph 234a of the 2024 NPPF. Notwithstanding this, the 2023 NPPF requires the Plan to be prepared positively and aspirational (paragraph 16b), be reviewed early in the event local housing need is expected to change significantly in the near future (paragraph 33) and aim to significantly boost the supply of homes (paragraph 60).
- 2.10 Paragraph 235 of the NPPF states that if any of the exclusions in paragraph 234 apply, the plan should be examined under the relevant previous version of the NPPF. In this case, that would be the December 2023 version. However, as the housing requirement no longer

meets the minimum 80% threshold of local housing need, the CLLP should not proceed under the December 2023 version. Instead, it should be examined against the December 2024 version of the NPPF and/or the Plan should be meeting the full LHN identified for the three authorities.

- 2.11 As set out in our response to Matter 6, Question 6.6, Bloor has significant concerns over the claimed housing supply from commitments, the developability of housing allocations in Chorley (expanded in Matter 5 Papers) and windfalls. This will mean that a five-year supply of housing land will not exist upon adoption, even with a reduced housing requirement as a result of the redistributed figure. The CLLP will therefore immediately be out-of-date on adoption, and applications in Central Lancashire will be assessed under the current NPPF and therefore be susceptible to grey belt applications. The solution to this is to allocate additional deliverable sites, such as Land at Springfield Road, to ensure a five-year supply exists on adoption.