

## **Matter 1b: Overarching Matters**

### **1.11 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?**

1. The HBF notes that to provide the requisite 15 year period from adoption (see paragraph 22 of the NPPF), the Local Plan [CD01] will need to be adopted by 2026.
2. The current published Local Development Scheme (LDS) [CD12] envisages adoption of the Local Plan by the end of 2026 and so on this basis, it would only just meet this requirement. However, any slippage in timescales from this point would mean the adoption of the Local Plan may go into 2027 and therefore not be in accordance with paragraph 22 of the NPPF.
3. To provide certainty and to cover the possibility that there could be a delay in adopting the Local Plan, the HBF recommends that an additional year is included to the plan (with the plan period extending to 2042).
4. To address the housing need in Central Lancashire in accordance with the latest Standard Method, the HBF also considers that once adopted, an immediate review of the Local Plan is needed, and this should be specifically set out in a policy in the Local Plan.

### **1.12 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?**

5. The Central Lancashire Local Plan undertook its Regulation 19 consultation between 24 February and 14 April 2025. This would mean that the Local Plan could proceed under the transitional arrangements outlined in paragraph 234a of the December 2024 NPPF. This would allow the Local Plan to be examined under the December 2023 version of the NPPF. However, this can only take place if the Local Plan meets at least 80% of its local housing need (LHN) calculated through the current Standard Method.
6. The Central Lancashire Housing Study Update (Dec 2024) [HO09] suggests that the recommended scenario is the 'employment led scenario' which corresponds to 1,237 dwellings per annum (paragraph 5.57/Table 22). However, the Local Plan itself proposes a higher figure of 1,314 dwellings per annum, with paragraph 4.19 stating that the increase was undertaken specifically to achieve 80% of the LHN calculated through the current Standard Method. This is on the basis of the LHN as calculated in December 2024 which is 1,643 dwellings per annum.
7. The HBF outlined in its Regulation 19 representations that it considered such an approach unjustified given the arbitrary and contrived nature of adding the 77 dwellings per hectare to the housing requirement solely to meet the requirements of transitional arrangements. This does not appear to be evidenced at all, other than to meet the transitional arrangements. The HBF does not consider that this was the intention of the transitional arrangements and they are clearly not being appropriately used in this case. Instead it appears that the Councils are trying to artificially reach

the 80% figure so as to 'bake-in' a housing requirement that is lower than if they were to prepare a plan under the current 2024 NPPF. The 2024 NPPF clearly sets out that plans at Regulation 19 stage should be meeting at least 80% of their LHN, not be planning for 80% of their LHN. Other national policy in the NPPF, PPG and elsewhere, including the Written Ministerial Statement (WMS) of 30<sup>th</sup> July 2024 (reference: UIN HCWS48) are clear that the Government seeks to achieve a significant step-change in house building, and therefore, Local Plans that are only aiming through artificial means to deliver 80% of their part of the national requirement cannot be consistent with the wider Government housing policy objectives.

8. Notwithstanding these points, HBF would also highlight that since the publication of the NPPF in December 2024, new housing stock information was released in March 2025 and affordability data in May 2025 (both prior to the submission of the Local Plan for examination in July 2025). This has resulted in an uplift in the LHN for Central Lancashire, as outlined in the table below.

Constituent Planning Authorities	Local Housing Need (December 2024) (dwellings per annum)	Local Housing Need (from May 2025) (dwellings per annum)
Chorley	564	557
Preston	590	632
South Ribble	489	498
<b>Total</b>	<b>1,643</b>	<b>1,687</b>

9. This now means that the Local Plan requirement of 1,314 dwellings is no longer at 80% of the LHN, instead it is around 77.8%. On this basis, the Local Plan would not qualify to be examined under the transitional arrangements.
10. As this is the case, the HBF cannot see any justification for the Council to be aiming to meet 80% of the LHN, rather it should be meeting the LHN in full by identifying additional housing sites.

**1.13 How have made and emerging Neighbourhood Plans been taken into account and where is this evident?**