

Matter 1B Hearing Statement

For ID: Wain Homes A68 | 23-106

In relation to:- Central Lancashire Local Plan Examination

Project: 23-106
Hearing: Central Lancashire Local Plan Matter 1B
Client: ID: Wain Homes A68
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1. Matter 1B – Overarching Matters

- 1.1 This Hearing Statement sets out the response of Wain Homes North West to Matter 1b - Overarching Matters.

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?

- 1.2 No. The plan period is proposed to be 2023 to 2041 so the end date of the strategic policies relating to housing and employment land supply is 31st March 2041. With the Examination now taking place until the end of January, the earliest that the plan could be adopted is later this year which will be beyond 1st April 2026. Therefore, without any delays the Plan will only have a plan period of just over 14 years after adoption and therefore does not meet the minimum period of 15 years contrary to paragraph 22 of the Framework.

- 1.3 This issue was raised in our previous submissions. At Regulation 18 we stated:

“The base date used primarily for the purposes of monitoring of the housing and employment supply, is 1 April 2023. As a result, the end date of the strategic policies relating to housing and employment land supply is 31 March 2038. Therefore, even on the basis of the Council’s own schedule, the plan will not cover a period of 15 years at adoption and is considered to be unsound and not in accordance with national planning policy.

Even if the LDS is correct and the Plan is adopted in mid-2025 the Local Plan period must be extended to 2040 in order to be consistent with national planning policy.”

- 1.4 At Regulation 19 we stated:

“The end date of the strategic policies relating to housing and employment land supply is 31 March 2041. Therefore, even on the basis of the Council’s own LDS, the plan will only have a plan period of 14 years 3 months after adoption and therefore would not cover a period of 15 years. Therefore, it is considered to be unsound and not in accordance with national policy.”

- 1.5 Our Regulation 18 and 19 representations also refer to other Examinations we are involved with. We referred to the ongoing Wiltshire Examination and for ease of reference in their letter dated 27th February 2025, the Inspectors state:



“The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities.

We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified.”

- 1.6 Therefore, the lack of a 15 year plan period from adoption has been a live issue throughout the preparation of the local plan on a consistent and clear matter set out in national policy, yet the authorities have not addressed it. The Plan fails to meet paragraph 36(a) and (d) of the Framework. The plan period should be extended to 2042 as a minimum in order to be considered sound.

- 1.7 As to the second part of the question, there is no provision in the Plan for an early review. Paragraph 4.21 states:

“4.21 Each Council will monitor delivery rates within their area annually in accordance with a published trajectory to ensure delivery rates are maintained. A review of policy HS1 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.”

- 1.8 However, paragraph 34 does state:

“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.”

- 1.9 In response to the question if an early review is to form part of the Plan, then it must be set out in a policy. From experience commitments in local plans to early reviews have not worked unless there is a policy with a clear timetable and consequences. We attended the Bedford Local Plan 2030 Examination and Policy 1 of the Plan states:



Policy 1 - Reviewing the Local Plan 2030

The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019.

The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.

The review will also serve to build stronger working relationships with adjoining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography.

1.10 In Bedford's case they did progress their review which was submitted for examination on 12 January 2023 within the 3 years set out in Policy 1. If they did not, then paragraph 11(d) would be engaged. That plan was subsequently withdrawn due to the announcement of the Universal Destinations and Experiences Resort/theme park project (Universal Studios) during the Examination and how that impacts upon the submitted Local Plan in combination with the Inspector's recommendation for additional allocations.

1.11 Therefore, if an early review is to be proposed then it must follow the above example.

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?

1.12 We note the letter to the Chief Executive of The Planning Inspectorate dated 9th October from Minister of State for Housing and Planning which states "*evidencing of expectations to establish whether the legal and soundness tests have been met – including with respect to the Duty to Cooperate – should be proportionate to the context in which plans in the existing system are being prepared*". The Minister states:

"For example, I note recent pragmatic decisions to proceed toward adoption in instances where a five-year housing land supply cannot be evidenced at the point of



adoption but where the plan significantly boosts supply and still meets housing needs over the plan period or by providing additional opportunities to clarify compliance with the Duty to Cooperate.”

1.13 He then states:

“It remains important that we do not see the adoption of poor-quality plans, or accept overly long examinations (I am grateful for the action that Inspectors have taken following my letter of 30 July 2024 in that regard). However, within those bounds, where plans are capable of being made adoptable, I want Inspectors to seek to do so in the examination process.”

1.14 In his response dated 30th October 2025, the Chief Executive of The Planning Inspectorate welcomed “a pragmatic approach to applying national policy where doing so will result in plan adoption, particularly where this would boost housing land supply”. However, he does recognise that Plans still require proper scrutiny and states:

“In other instances, however, the issue has been that the authority simply has not engaged in the constructive, active and ongoing way required in legislation. As you appreciate, where that is so, the Inspector’s hands are tied. In my view, the fact that Inspectors are unable to remedy such shortcomings can be a blocker in the current system, and for operational reasons I welcome the absence of this feature in the new system. I would note that replicating that arrangement for the current system would increase the degree to which Inspectors are able to exercise flexibility and bring plans through examination to adoption.”

1.15 We assume one plan that the Chief Executive is referring to is South Oxfordshire and Vale of White Horse Joint Local Plan where the Inspectors recommended the plan be withdrawn on the Duty to Co-operate. In their letter dated 26th September 2025, they state:

“In summary, potential unmet housing need for Oxford City beyond 2031/36 and how the JLP accommodates previously agreed unmet need are strategic matters and, therefore, fall under the DtC. Consequently, the Councils should have engaged constructively, actively and on an on-going basis on the issues. Whilst there were some early attempts at engagement, for the period between January 2024 and November 2024 meaningful engagement on this issue did not occur outside of the formal examination process. Consequently, the DtC in Section 33A of the 2004 Act has not been met. This cannot be remedied during the examination of the plan”. (our emphasis)

1.16 With regard to Central Lancashire, our concerns on the plan period and the implications of the transitional arrangements are a fundamental part of the reason why the Plan is unsound and going back to the South Oxfordshire plan we do not consider the authorities have engaged constructively in meeting the soundness tests and would be a poor-quality plan which the Minister is not wanting to see progress. On the Minister’s statement that a pragmatic approach can be undertaken “where the plan significantly boosts supply and



still meets housing needs over the plan period”, we consider the Plan as submitted fails to do so. Our client is part of the Consortium led by Stantec on housing needs and supply and we rely on their submissions.

- 1.17 However as we have set out at the Regulation 19 stage, we consider the arbitrary increase of 77 dwellings to meet the 80%¹ in the transitional arrangements fails to meet the tests of soundness to progress a Plan that was not ready for submission and purposefully seeks to meet the transitional arrangements and failing to plan for the remaining 20% of the standard method. That 20% equates to some 5,000 homes over the plan period. The implication is that these are 5,000 households in housing need that the plan making system is failing to meet. An early review as set out in the Bedford example is a way to help mitigate this issue however, we maintain that the Plan is not significantly boosting supply and should address these fundamental issues of soundness through the allocation of additional land now.

Q1.13

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

- 1.18 A further implication of the transition arrangements and the arbitrary increase is not just meeting the needs of Central Lancashire but local communities. The arbitrary increase can be seen when the authorities recently wrote to the Local Plan Inspectors in response to Inspectors’ Initial Questions (Examination Library ref: CLA03).
- 1.19 In terms of spatial settlement hierarchy, CLA03 notes that Broughton was moved to a Tier 4 settlement from Tier 5 given its improved services and public transport links (pages 5 & 6). However, the document goes on to note that there is one allocation for 8 no. dwellings in Broughton over the plan-period at page 8 of the document (Site Allocation Ref: HS4.25). It also notes that there is a large allocation at Grimsargh, a Tier 4 settlement, for 477 no. dwellings (Allocation Ref: HS4.1) and other allocations include 151 no. dwellings in Barton, a Tier 5 settlement (Site Allocation Ref: HS4.4).
- 1.20 In terms of neighbourhood plans, CLA03 says the following at page 11:

“The Broughton Neighbourhood Plan is currently under review by the Parsh Council. The current Plan allocations have been built out or are no longer promoted for development and do not feature in the draft Plan which the Parish Council recently consulted on. Land has been promoted outside of the defined settlement boundary in this area to the Parish Council, however the Council’s position is that no additional large scale growth is required in this area outside the settlement boundary to support the Council in meeting

¹ On the basis of LHN being rounded up.



its housing requirement for the reasons set out above, and the CLLP only allocates a small plot of land within the existing settlement boundary of Broughton.”

- 1.21 At page 12, CLA03 says no housing requirement for designated neighbourhood plan areas have been identified because of one or more of a list of reasons. At page 15-16, CLA04 says the following:

*“The Council have worked closely with Broughton Parish Council on the review of their Neighbouring plan (Currently at Regulation 14). Whilst **Broughton have aspirations to allocate additional land outside the settlement boundary in their recent consultation on the basis of additional community benefits from that development**, (our emphasis) however Preston Council have been clear they have not identified a need for housing growth in this area given the high number of dwellings permitted in recent years and the continued delivery of development in North West Preston. For this reason, no housing need has been identified for the Parish of Broughton.”*

“Therefore, the CLLP does not set out a housing requirement for designated neighbourhood areas, but the local planning authorities would provide an indicative figure if it were requested by a neighbourhood planning body.”

- 1.22 As can be seen the reason given is that the authorities do not consider there is an identified housing need in this area based on past completions and North West Preston. However, the Parish is looking to future needs in their neighbourhood plan, but the Local Plan is meeting just 80%² of those future needs under the transitional arrangements. As we set out under Q1.12 above there is a need for some 5,000 homes in Central Lancashire that is not being met by this Plan of which a proportion would be at settlements such as Broughton.
- 1.23 For context only as the Examination is not considering omission sites, the site in question, referred to by the authorities above as an allocation in the Regulation 14 Broughton Neighbourhood Plan, is our client’s omission site at Section 8 of our Regulation 19 representations (Land off Whittingham Lane/James Towers Way, Broughton). The draft allocation in the neighbourhood plan includes a community building, a care home and land for expansion of the primary school alongside housing development. There is a pending planning application for this scheme (LPA ref: 06/2025/0519). The parish council wishes to progress to a Regulation 16 neighbourhood plan consultation, including our client’s omission site as a site allocation, and have requested that Preston City Council commence this consultation.
- 1.24 There is no sound reason why the authorities have not carried forward the draft site allocation in the Regulation 14 neighbourhood plan, which the neighbouring plan steering group wish to come forward to support the vitality and viability of this thriving community, through the emerging local plan. It would be consistent with the Plan for a Tier 4 settlement i.e. limited growth proportionate to the size of the settlement to support local services. Therefore, emerging Neighbourhood Plans have not been taken into

² On the basis of LHN being rounded up.



account, and the consequence of the transitional arrangements is that the Plan could frustrate delivery and not meet future housing needs in such areas.



