



Central Lancashire Local Plan Examination

Matter 1a & 1b Hearing Statement

November 2025



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MATTER 1A – LEGAL COMPLIANCE

Question 1.4 : Does the Integrated Assessment (IA) provide a comprehensive and robust basis to inform the strategy and contents of the Plan, particularly in terms of:

(a) Its assessment of the likely effects of the plan's policies and allocations?

(b) Its consideration of reasonable alternatives, including the development quantum and spatial distribution options? Does it capture all reasonable alternative site options put forward in the Plan preparation process? Can these be compared on a like for like basis?

(c) Its explanation of why the preferred strategy and policies were selected?

(d) Its assessment of the amount of development that would arise as a result of the provisions in the Plan?

[Note: This question focusses on the legal compliance of the IA in broad terms. The implications of the IA for the soundness of the plan are considered under other Matters.]

1.1.1 No, the IA does not provide a robust basis to inform the strategy and contents of the Plan. The IA tests three varying housing quantum, yet none of which are the figure that the plan is proposing. The closest to this figure is the employment led scenario of between 1,237 to 1,275 new dwellings per annum which is 39 dwellings less per annum than the proposed plan. Across the plan period this is 702 dwellings which have not been tested. As a minimum, it is clear that further IA work will be necessary for a legally compliant local plan.

1.1.2 Gladman does not consider the Integrated Assessment clearly justifies the reasoning for the Regulation 19's policies and allocations, nor does it consider alternative site allocations thoroughly. This is because there is a lack of an up-to-date evidence base to support the scoring on table 5.1 of the IA which shows the likely sustainability effects of reasonable alternative development site options in Preston.

1.1.3 Gladman supports that the IA assesses all sites that have been considered in the site selection process, however, Gladman does not understand how the scoring has been

derived with a lack of an up-to-date evidence base for the recent Regulation 19 consultation.

- 1.1.4 This is evident with the previously draft allocated site at the Preferred Options Stage (December 2022), the site's SHELAA reference is 19P007, and was allocated for 110 dwellings previously. The Open Land Designation Study was produced in October 2022 which helped inform the draft site allocations of the emerging plan within the Preferred Options report. This evidence base therefore informed the Preferred Options IA scoring.
- 1.1.5 While the Regulation 19 version of the plan has no new up to date evidence base, Gladman does not understand why scoring across the following objectives has since changed. With particular relevance for the previously allocated site (Ref: 19P007) are both IA objective 11: Conserve and enhance biodiversity, green infrastructure and geodiversity assets, and IA objective 17: Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of the CLLP area, whilst reducing land contamination.
- 1.1.6 Gladman considers the scoring to not be supported with an up-to-date evidence base, and therefore the IA to not be robust nor comprehensive in its ability to inform why certain policies and strategies were selected for the submission version of the Local Plan.

Question 1.6: Does the Plan include policies to address the strategic priorities for the development and use of land in Central Lancashire? How are these identified in the Plan?

- 1.1.7 Gladman does not consider the policies within the plan cater to the wider needs within Central Lancashire. The direction of housing does not address the strategic priorities for development and use of land in Central Lancashire. This is clear as the quantum of housing is not reflective to the need in each administrative area. Preston has a Local Housing need of 633 dwellings per annum, this is significantly higher than Chorley's LHN of 558 dwellings per annum and South Ribble's being 499 dwellings per annum. The housing need is not reflective of the distribution of housing across Central Lancashire authorities.

- 1.1.8 Additionally, Gladman does not consider the policies within the Local Plan sustainably address the use of land within Central Lancashire. For example, in respect of the evidence base to support proposed landscape designations in the plan, the most recent assessment to support this is the Open Landscape Designation Study produced in October 2022 which informed the preferred options report. Since then and with the submission version of the plan there is a clear disconnect between the findings in the study and the site allocations. Without an up-to-date evidence base there is no reason to explain a change in IA scoring across sites from the preferred option stage, and the subsequent changes to allocated sites. This is evident in policy EN18 'Area of Separation,' which has now been extended across sites which were described as having no effect to the open countryside and being self-contained in the previous Open Landscape Designation Study in 2022.
- 1.1.9 Finally, Gladman does not find the settlement hierarchy to be reflective of the use of land allocated for housing. This is clear as Broughton is now identified to be a Tier 4 Settlement, however, the reduction of housing allocations from the Preferred Options stage to the Regulation 19 stage is a total of 102 dwellings , with the only allocated site being (Ref: HS4.25) for 8 dwellings, the level of growth directed to the sustainable settlement is failing to address the strategic priorities for the development and use of land in Central Lancashire.

2 MATTER 1B – OVERARCHING MATTERS

Question 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?

- 2.1.1 Within para 234(a) it explains for a plan at Regulation 19 stage on or before the 12th March 2025, the draft housing requirement needs to meet a minimum of 80% of Local Housing Need. Para 235 then goes onto explain when the above applies the plan will be examined under the relevant previous version of the Framework.
- 2.1.2 The implications of the above transitional arrangement which applies to the Central Lancashire Local Plan has caused the Council to add an additional 77 dwellings per annum to their previously established housing requirement of 1,237 dwellings per

annum. Simply adding 77 dwellings per annum to meet the minimum requirement is not what the Government envisaged. The Council's should be aiming to reach 100%, and as there is no evidence to support why the 77 dwelling per annum can only be delivered which is the arbitrary uplift and not to meet 100% of the Local Housing Need Figure. The Council's should only be delivering less if there is a clear reason evidenced as to why this is not deliverable.

2.1.3 This is clear from the July 2024 Written Ministerial Statement 'Building the New Homes we Need,' all Local Authorities must plan to meet as much of their requirement as possible and make every effort to allocate land in line with their housing need as per the standard method.

2.1.4 With the more up to date Local Housing Need figures published in May 2025, the Local Plan only meets 77.8 % of Local Housing Need. On this basis, the plan does not meet para 234(a) nor should it be examined under the transitional arrangements.

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

2.1.5 There is no evidence that made or emerging neighbourhood plans have been taken into account of in the Local Plan. Gladman would propose that the Local Plan should direct growth to the identified sustainable settlements and encourage Neighbourhood Plan's to allocate housing sites in line with the Local Plan.