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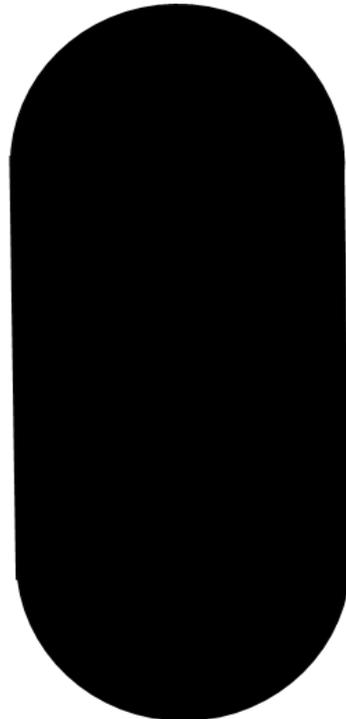
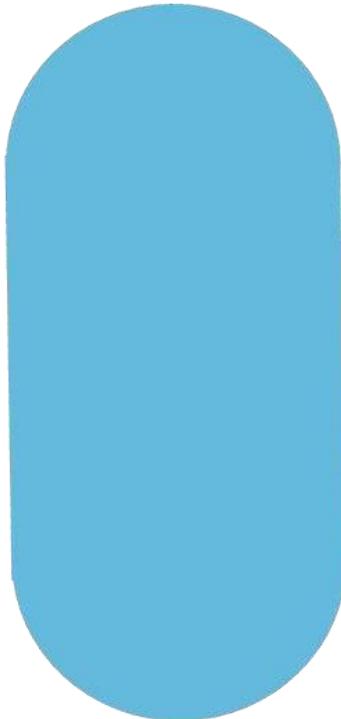
Central Lancashire Local Plan

Examination in Public

Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

Taylor Wimpey UK Limited

November 2025



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1. Introduction

- 1.1. This response to Matter 2 of the Inspectors' MIQs in respect of the Central Lancashire Local Plan (CLLP) Examination in Public has been prepared by Marrons on behalf of Taylor Wimpey.
- 1.2. This hearing statement should be read alongside previous representation to the Regulation 19 Consultation submitted by Marrons on behalf of Taylor Wimpey and should be considered in the context of support for a plan led system.
- 1.3. Acting on behalf of our clients, Marrons will attend the Matter 2 Hearing Session and make further oral submission on behalf of our client. This statement outlines Taylor Wimpey's comments in respect of Matter 2, with responses to the Inspectors' MIQs (Matter 2) are set out below.
- 1.4. In order to assist the Inspectors', the contents of this submission and the submissions made in respect of other matters, demonstrate that the submission version of the Plan is not, in our assessment, capable of being found sound, without significant additional evidence and the identification of additional sites in sustainable locations to accommodate housing growth over the Plan period.
- 1.5. These submissions reflect the position outlined by Housing Minister Matthew Pennycook in a letter to the Chief Executive of the Planning Inspectorate in July 2024 with regard to the continued use of 'pragmatism' in the Examination of Plans and the recognition that any fundamental issues or areas of additional work that require a pause of more than six-months in the Examination process, should indicate that a Plan is incapable of being found sound. As such, in accordance with the above consideration, we do not believe that the Plan is capable of being found sound noting that the degree of additional work we consider to be required to make the Plan sound would require a pause in the examination in excess of 6 months.
- 1.6. In making this submissions, we also reflect the more recent letter from Housing Minister Matthew Pennycook to the Chief Executive of the Planning Inspectorate in October 2025 which revokes the letter issued in March 2014 by the then Minister Nick Boles, and

makes clear that where it would assist in ensuring a plan can be made sound, Inspectors can advise during examinations that a Green Belt review should be undertaken.

1.7. We consider that the spatial strategy and site selection process is totally flawed, as it does not meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (“the SEA Regulations”). There has been a failure, specifically in relation to the IA, to consistently and robustly consider all reasonable alternatives contrary to Regulation 12 and Schedule 2, paragraph 8. For instance, Green Belt sites were excluded from consideration, including those that are demonstrably sustainable and deliver more socioeconomic and environmental benefits than selected Brownfield sites. As such, we do not consider that the Plan is capable of being found sound.

2. Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

Q2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies SS1 and SS2 supported by robust and up to date evidence and otherwise soundly based?

- 2.1. The proposed spatial strategy and distribution of development is not considered sound. As set out at paragraph 6 of the NPPF (December 2023), it is a sufficient amount and variety of land, to meet different housing needs, and which can be developed without unnecessary delay, is planned for. Whilst the use of brownfield and previously development land is supported, the plan places reliance on strategic allocations, focused around the Preston urban area, a number of which have constraints and complexities which risk delaying or even limiting their development, including physical constraints such as heritage and potential contamination, as well as the presence of ongoing uses. This presents a risk to the delivery of the plan, and the ability of the Councils' to maintain a 5 year housing land supply.
- 2.2. Policy SS2 artificially downplays the sustainability of Tier 2 and 3 settlements, many of which benefit from high quality sustainable transport connections, benefit from a wide range of services and employment opportunities, as well as having the potential to deliver a wider variety of development sites than is currently planned for. Further growth should be allocated to tier 2 and 3 settlements to ensure the plan is sufficiently flexible and robust.
- 2.3. As drafted policies SS1 and SS2 fail to deliver the ambitions to deliver a wide range of high-quality sustainable new housing to meet the needs of the area's diverse communities, and this approach is not considered justified, effective, or consistent with national policy and as such is unsound.

Q2.2 - What is the evidential basis for the settlement hierarchy in policy SS2? Is this consistent across all 3 authorities? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

- 2.4. In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). The CLA consider this requirement to be met through the preparation of the Integrated Assessment (IA). We consider that the IA fails to adequately and consistently test reasonable strategic options and specific sites and ultimately fails to meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (“the SEA Regulations”). The IA has played a central role in shaping the settlement hierarchy outlined in Policy SS2. It has primarily directed development towards the Preston Urban Area, emphasising development on brownfield land. As previously noted, the principle of prioritising brownfield land for development is supported, however we consider that the IA does not give enough weight to social and economic objectives. This has resulted in a hierarchy that concentrates growth on strategic allocations within the Preston Urban Area, despite clear limitations, particularly in terms of highways capacity, physical constraints, and deliverability. These issues are likely to delay development at a time when the need for housing is urgent. The IA fails to adequately reflect these constraints in its scoring and does not appropriately consider the benefits for dispersing growth towards more deliverable and sustainable locations across the wider plan area.
- 2.5. We consider that policy SS2 is unsound, unjustified, ineffective and is inconsistent with national policy. and that further growth should be allocated to the tier 2 and 3 settlements.

Q2.3 - What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Integrated Assessment work?

- 2.6. Four main spatial strategy options were considered through the IA, alongside the option of a new settlement. The justification for the Councils’ preferred approach – Option 1: rolling forward the current approach – is unclear, particularly given Option 4, a more dispersed pattern of development, appears to score more positively in the Councils’ own assessment, as set out in the IA. It appears that the Council’s selection of Option 1 was predetermined rather than guided by the SEA process, and further testing of reasonable alternatives dismissed. Given, as the Councils’ have expressed in their response to the Inspector’s initial questions (CLA03), this approach is underpinned by the 2012 Core Strategy and associated evidence base, it fails to reflect significant policy and contextual

changes since the preparation of the Core Strategy, and is not considered justified or effective.

2.7. The distribution of growth across the plan area has in large part been driven by the 3 housing quantum options tested through the IA, based on a LHN baseline scenario, POPGROUP 5-year based scenario, and an employment-led projection scenario. The IA states that option 3 (the employment-led scenario) was selected on the basis that there a range of indicators which support a higher housing need than the NPPF December 2023 derived LHN. This option however results in a significant redistribution of growth from Chorley compared to a LHN led option. The environmental and socio-economic effects of this redistribution have not been adequately considered through the IA, and wider plan making process, despite it having potentially significant effects in relation to areas such as sustainable transport and air quality. It is also not clear why alternative higher-growth scenarios were not considered, when, as stated in the IA, there were a range of indicators which comprehensively showed that the LHN baseline scenario would fail to adequately meet the housing needs for the plan area.

Q2.4 - Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

2.8. The assessment and selection of sites for allocation is fundamentally flawed, given that the IA includes no assessment of sites within the Green Belt whatsoever. The supporting text of the draft Local Plan confirms that the assessment of sites within the Green Belt was 'parked' whilst seeking to understand if needs could be met outside of the Green Belt. Whilst we acknowledge that the plan was prepared under the provisions of the NPPF 2023, it does not reflect significant changes in national policy, most notably the introduction of the Grey Belt and increased clarity on what constitutes inappropriate development in the Green Belt. Therefore, it fails to consider more sustainable locations for development, within the Green Belt, which can deliver improved environmental and socioeconomic benefits that many of the Brownfield sites in and around the Preston Urban Area. There are a number of smaller settlements, that would constitute tier 2 and 3 settlements in the settlement hierarchy, that possess existing transport infrastructure, local amenities, and have a demonstrable need for housing growth. These locations represent sustainable and logical opportunities for development yet have been unjustifiably excluded from meaningful growth allocations due to their location within the Green Belt. This blanket exclusion fails to identify viable and deliverable sites.

2.9. By simply excluding Green Belt sites from assessment, the Councils' have failed to consider potential alternatives, prejudicing the objectivity and robustness of the IA and site selection process. We consider this approach is not justified, effective, or consistent with national policy, and as such is unsound.

Q2.5 – Does the Plan allow sufficient development in rural local centres, smaller villages and hamlets, rural areas and settlements to comply with paragraph 83 of the Framework? Are the proposed settlement development boundaries up to date and are these appropriately drawn? What factors were taken into account in designating these?

2.10. No response

Q2.6 – What are the Plan's assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans?

2.11. No response

Q2.7 - Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?

2.12. As discussed above, the policies place a significant reliance on a series of strategic sites around Preston, a number of which are subject to a range of constraints and complexities, and where there is a risk of development being delayed, or potentially limited. A consortium of Taylor Wimpey and other housebuilders submitted a detailed analysis in response to the publication plan on housing land supply (representation reference A32.3-5) which showed that none of the Councils will be able to demonstrate a 5 year supply on adoption of the plan, and that the supply of housing is inadequate over the plan period. As part of the consortium, Taylor Wimpey have also submitted a hearing statement on matter 6 setting out their concerns in relation to these issues. Additional sites should be allocated in sustainable location in and around tier 2 and 3 settlements to ensure the plan is sufficiently flexible to respond to any delays, that a wide variety of development sites are available, and to ensure a 5 year housing land supply can be met in the first instance and also maintained throughout the plan period.



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