



Central Lancashire Local Plan Examination

Matter 2 Hearing Statement

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MATTER 2- VISION & OBJECTIVES, SPATIAL STRATEGY & LOCATION OF NEW DEVELOPMENT, AND THE SITE SELECTION PROCESS.

Question 2.1: 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? In particular:

a) Does it reflect the vision and objectives of the Plan?

b) To what degree is the distribution of development set out in Policy SS2 based on the settlement hierarchy in Table 1?

c) Is the focus on the larger urban settlements justified and soundly based?

d) How were the proportions of development proposed for each settlement arrived at?

e) Would it provide sufficient development within rural areas and other settlements?

f) Does the distribution of employment related development take appropriate account of national and regional programmes and strategies?

1.1.1 Gladman does not find the distribution of development set out in Policy SS2 to be reflective of the settlement hierarchy. This is clear as Broughton, which is now identified as a Tier 4 Settlement is only allocated one residential site being (Ref: HS4.25) for 8 dwellings. This is not reflective of the settlement's level of sustainability and proximity to the Preston Urban Area, its ability to help meet Local Housing Need across Preston, and the wider Central Lancashire area.

1.1.2 While Preston's urban area is very concentrated, Gladman would strongly recommend that development opportunities within the Rural Local Service Centres in Preston are considered to sustainably meet the housing needs within Preston. This is supported in para 83 of the NPPF (2024) where it states, '*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.*'

Question 2.2: 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?

- 1.1.3 Gladman would not consider the settlement hierarchy in Policy SS2 is accurately reflected across settlements within the district, nor does it appear to have been used to inform the distribution of development across the plan area consistently. Notwithstanding our objections made in our Regulation 19 response to the placing of both Broughton and Goosnargh in the settlement hierarchy, with Goosnargh clearly serving as a Tier 4 Rural Local Service Centre not a Smaller Rural Village, the current spatial distribution in the plan does not follow the identified settlement hierarchy.
- 1.1.4 It is currently difficult to ascertain the proposed spatial distribution without a corresponding table within the plan itself nor a future level of growth that would be considered appropriate within each of the identified settlements if seeking to remedy any future shortcomings in housing delivery.
- 1.1.5 This is visible when looking at both Goosnargh and Broughton which are both identified as Tier 4 settlements in Policy SS2. Goosnargh has a total of 477 dwellings allocated to the settlement, while Broughton has a total of 8 dwellings allocated. Gladman therefore considers the development strategy and the level of growth distributed to be inconsistent within the Local Plan.
- 1.1.6 Additionally, the Areas of Separation in policy EN 18 has influenced the strategy and areas of growth, however, there is no up to date evidence base to support this.
- 1.1.7 Alternatively, Gladman would like to note that the amount of development required should be determined first by how much development each settlement needs, then it should be determined whether it can be accommodated taking into account constraints, rather than the constraints informing the number of dwellings allocated to each settlement.

Question 2.3: 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?

1.1.8 Within the IA the Spatial Strategy Option 4 involves 'a more dispersed pattern of development,' which would involve development taking place lower down the settlement hierarchy with more growth directed to Rural Local Service Centres. While the IA does assess alternative spatial options for growth, Gladman does not consider the IA to be robust with the lack of an up to date evidence base to inform the scoring of the alternative growth options.

1.1.9 It is also noted that Options 1-4 scored similarly, with Option 2 scoring the most favourably which involves 'urban intensification.' Gladman does not think the preferred which is Option 1 to 'roll forward the current approach' is clearly evidenced as to why it has been chosen over Options 2-4. Gladman suggests the preferred Option should combine Options 1-4 to make a more sustainable and holistic Spatial Strategy Option, ensuring options which have been scored favourably are not completely discounted as Option 4 has been.

Question 2.4: Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

a) Is the site selection process transparent? How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?

b) Were constraints given relative weight in the site selection process? If so, how was this determined?

1.1.10 The sites assessed in the IA are not assessed with an up-to-date evidence base.

1.1.11 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 the lack of up an to date evidence base and recent changes in the scorings across sites from the preferred options stage to the regulation 19 stage of the plan.

- 1.1.12 This is evident for the previously draft allocated site at the Preferred Options Stage (December 2022), the site SHELAA referenced 19P007 was allocated for 110 dwellings. There was an Open Land Designation Study produced in October 2022 to help inform the site allocations and support the Preferred Options report. This evidence base therefore informed the Preferred Options IA scoring.
- 1.1.13 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 changed with particular emphasis for the previously allocated site (Ref: 19P007). The following IA objectives of relevance being '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.'

Question 2.5: 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?

- 1.1.14 Gladman would not consider the plan allows for sufficient development in Rural Local Service Centres. This is evident looking at Broughton where there is only one allocated site being (Ref: HS4.25) for 8 dwellings. This is not reflective of the settlement's level of sustainability and its ability to help meet Local Housing Need's across Preston, and the wider Central Lancashire area. While Preston's urban area is very concentrated, Gladman would strongly recommend that development opportunities within Preston's Rural Local Service Centres are considered to sustainably meet the housing needs in Preston.
- 1.1.15 The Broughton settlement is sustainably located north of Preston Urban area and has recently had the James Towers bypass built out north and east of the settlement, connecting the settlement to the urban centre south of Broughton.
- 1.1.16 Paragraph 83 of the Framework clearly states,

1.1.17 *'policies should identify opportunities for villages to grow and thrive, especially where this will support local services.'*

1.1.18 Broughton is a prime example of a settlement which has its own local services and is also in reach of a wide array of services and facilities within Preston's urban area utilising active and sustainable transport modes. The settlement 'has the opportunity to grow and thrive' while also supporting Preston's urban area and its economy.