



Central Lancashire Local Plan Examination

Matter 12 Hearing Statement

November 2025



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01260 288888

MATTER 12 – ENVIRONMENT POLICIES

Issue 12 - Does the Plan set out positively prepared policies in relation to the environment which are justified, effective and consistent with national policy?

12.1 - Are the requirements of Policy EN1 clear and would they be effective? Are they consistent with requirements set out in the 'Key Development Considerations' for the site allocations? Are the requirements justified by appropriate evidence, having regard to national guidance? What is the justification for setting the nationally described space standards and the water efficiency requirement at 110ltrs per day? How is this supported by evidence?

1.1.1 Design standards should not jeopardise or delay the delivery of the new homes through requirements for unnecessary and costly layers of additional submission information. Accordingly, Gladman refer to the suggested amendments provided in our Regulation 19 representation.

12.2 - Are the requirements of Policy EN2 clear and would they be effective? Are they consistent with requirements in other policies within the plan?

1.1.2 No comment

12.3 - Are the requirements of Policy EN3 clear and would they be effective?

1.1.3 No comment

12.4 - Are the requirements of Policy EN4 clear and would they be effective? Does the policy take adequate account of the needs of established uses with regard to the "agent of change" principle?

1.1.4 No comment

12.5 - Are the requirements of Policy EN5 clear and would they be effective? On what basis were the sites allocated for Green Infrastructure both within the policy and on the policies map identified and are they justified?

1.1.5 Gladman refer to the suggested amendments provided in our Regulation 19 representation.

1.1.6 **12.6 - Are the requirements of the Policy EN6 clear and consistent with national policy? Would they be effective?**

1.1.7 For the reasons provided in our Regulation 19 representation, Gladman object to policy EN6 on the basis that its wording deviates from the legal mandate for 10% Biodiversity Net Gain as set out within Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Criterion 2 of Policy EN6 states that: 'Developments must deliver the mandatory Biodiversity Net Gain (BNG) requirement of *at least 10%...*'. Reference to 'at least' should be removed.

12.7 - Are the requirements of Policy EN7 clear and consistent with national policy? Would they provide an effective framework for biological and geological conservation? How would no net loss of the ecological or conservation value of designated sites and delivery of net gain be demonstrated and when would net gain be expected? Where potential cumulative impacts have been identified, how would these be assessed on a site by site basis?

1.1.8 No comment

12.8 - Are the requirements of Policy EN8 clear and would they be effective? Would they be consistent with the requirements in other policies of the plan and would they be viable?

1.1.9 No comment

12.9 - Are the requirements of Policy EN9 clear and consistent with national policy? Would they provide an effective framework for species protection?

1.1.10 No comment

12.10 - Are the requirements of the water related policies EN10-EN12 clear, effective, and would they be consistent with national policy? In particular:

a) *In relation to EN10 are the policy requirements in relation to agricultural land and flood mapping updates clear and would they be effective?*

1.1.11 No comment

b) *Does Policy EN10 adequately reflect considerations in relation to flooding from all sources, including surface water flooding (pluvial and sewer)?*

1.1.12 No comment

c) *Does Policy EN11 and its supporting text provide clear guidance for developers and decision makers on how Sustainable Urban Drainage should be provided within developments?*

1.1.13 No comment

d) *Does Policy EN12 and the supporting text adequately explain its requirements in relation to safeguarding public water supply?*

1.1.14 No comment

12.11 - Are the requirements of Policy EN13 clear, effective and consistent with national policy. In particular:

a) *Does the policy provide clear direction in how the matter of "less than substantial harm" should be addressed?*

1.1.15 No comment.

b) *Does the policy provide adequate direction in relation to development which may impact upon archaeological assets?*

1.1.16 No comment.

12.12 - Are the requirements of Policy EN14 clear, effective and consistent with national policy. In particular, should the policy directly refer to water quality and unstable land? How will significant harm to soil quality be defined?

1.1.17 No comment.

12.13 - Are the requirements of Policy EN15 clear, effective and consistent with national policy. In particular:

a) How were the thresholds identified in the policy arrived at?

b) Would policy EN15 provide an effective basis for directing a decision maker in light of the changes to national policy in the NPPF Dec 2024?

1.1.18 Gladman refer to comments made regarding Policy EN15 in our Regulation 19 representations. Policy EN15 should be deleted.

12.14 - Are the requirements of Policy EN16 clear, effective and consistent with national policy? In particular:

a) What is the justification for the 0.5 hectares site threshold in the policy?

1.1.19 No comment

b) How will a developer demonstrate compliance with criterion b)?

1.1.20 No comment.

12.15 - Are the requirements of Policy EN17 clear, effective and consistent with national policy? In particular, is the policy consistent with policy EN15 and paragraph 84 of the NPPF?

1.1.21 As outlined in our Regulation 19 representation. Gladman would encourage the wording of Policy EN17 to be more flexible and permissive in nature to allow sustainable residential development to come forward outside of defined settlement boundaries. It should be clear that, where there is an absence of a five year housing land supply or where the authority's Housing Delivery Test score is less than 75% in relation to the recipient LPA, proposals for new housing development on sites outside the development limit of a settlement should be considered in accordance with the presumption in favour of sustainable development set out in national planning policy.

1.1.22 Gladman also reiterate our request that the policy specifically includes infill development within the list of acceptable development in the Open Countryside. The

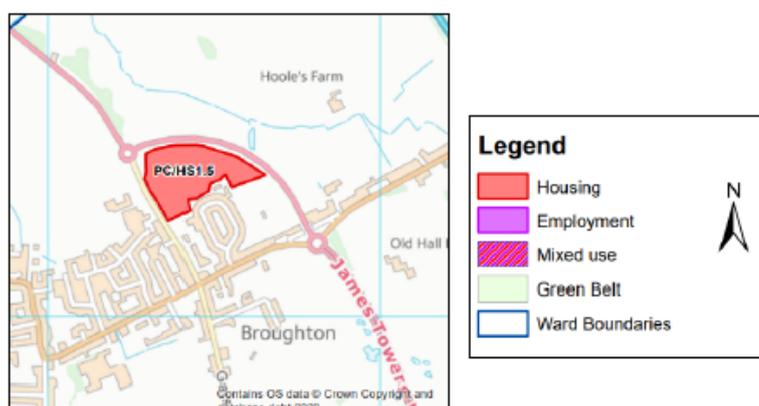
impact of such proposals on the open countryside is negligible as they are already considered within an existing built development context.

12.16 - Are the requirements of Policy EN18 clear, effective and consistent with national policy? In particular:

a) Is the policy supported by robust and up to date evidence to justify the policy?

- 1.1.23 Gladman's Regulation 19 Representation included an appended assessment prepared by landscape consultant Randall Thorp, which undertakes a critique of the evidence base relating to proposed policy EN18 Area of Separation (AoS) designation. The comments raised in this Statement should be read in conjunction with this assessment and those made in Gladman's Regulation 19 Representation.
- 1.1.24 The proposed Area of Separation designation remains unchanged within the CLLP submission version; Gladman therefore maintain our objection to the principle of this policy and its expansion under policy EN1, which Gladman contend to be flawed and inconsistent with the evidence base, with examples provided below.
- 1.1.25 Policy EN18 states the AoS will be maintained to protect areas where there is a risk of coalescence. The emerging policy goes on to identify criterion as to when development proposed within the defined Areas of Separation will be permitted.
- 1.1.26 The Policy is informed by the 'Areas of Separation Assessment' at Appendix C of the 'Open Land Designations Study: Landscape Assessment' (LUC) (2022). The study considers the strength of each gap and identifies key landscape elements and considers both the physical and visual role that intervening open land plays in preventing the merging of settlements.
- 1.1.27 Based on a methodology taking account of physical and vision separation of settlement, and their connection, the Study determines the strength of the Broughton-Barton Gap to be moderate. It makes specific reference to the role of James Towers Way as a boundary to development along the northern edge of Broughton. The Study specifically refers to the site: 'Land to the east of Garstang Road', which was a draft allocation in the CLLP preferred options plan version

(allocation ref. PC/HS1.5) (extract included below). It considers the site more strongly related to the settlement of Broughton than the open countryside to the north between James Towers Way and Barton. The site's planning history includes two planning applications¹ for residential development. Both applications were supported by the Preston City Council's statutory landscape consultee. Notwithstanding, the site was removed as a draft allocation and currently sits within the AoS. The inclusion of this in-fill site within the AoS is not supported by the evidence base and should be removed from it.



Preston Rural East Ward Allocations in Preferred Options Part 1 for Central Lancashire's Local Plan

1.1.28 Gladman also note the inclusion of land within the AoS, which Preston City Council have previously concluded would not cause harm to the effectiveness of the AoS. Land located at the western edge of Goosnargh as shown in the extract below, has been subject to three previous applications². Most recently, the officers report in relation to application ref. 25/2025/0647 at this site concluded:

'The proposed scheme would not result in the merging of the settlements of Goosnargh, Broughton and Grimsargh. As such, it is considered the effectiveness of the AoS gaps would be maintained. It is therefore considered that the proposal would not cause harm to the effectiveness of the AoS and would not conflict with the above policies.'

¹ Preston City Council Application reference: 06/2018/1297 / 06/2025/0868

² Preston City Council Application reference: 06/2018/0867 / 06/2020/1136 / 06/2025/0647

1.1.29 The same conclusion has reached by Preston City Council in relation to the previous two applications at the site. This site should therefore be removed from the AoS.



Extract from Randall Thorp Assessment 1

1.1.30 Gladman do not consider that sufficient evidence has been provided to justify why the existing AoS boundaries have been extended, particularly in relation to the two sites referred to above. Moreover, Gladman does not consider Policy EN18 to be consistent with national policy in principle, which makes no specific provision outside of Green Belt for the prevention of coalescence of settlements.

b) How is it to be applied alongside Policy EN17?

1.1.31 Gladman object to the principle of policy EN18 and its inclusion within the CLLP. It should be removed and therefore its application alongside policy EN17 is not considered necessary. Notwithstanding, in correspondence with our comments regarding policy EN17, policy EN18 should be clear that, in the event that an authority cannot demonstrate a five year housing land supply, or where their Housing Delivery

Test score is less than 75%, proposals for new housing development on sites outside the development limit of a settlement will be considered in accordance with the presumption in favour of sustainable development set out in national planning policy.

- 1.1.32 If the policy were to progress, Gladman also suggest that all land within the proposed designation, which is clearly characterised as infill land on the edge of settlements³ or has previously been deemed to not conflict with the current Area of Separation designation⁴ (EN4), should be removed entirely from the proposed Area of Separation. Examples of such sites are provided in Gladman's Regulation 19 representation and appended assessment prepared by Randall Thorpe.

12.17 - Are the requirements of Policy EN19 clear, effective and consistent with national policy? In particular, should the policy refer to the impacts of development in relation to light pollution and impacts of tranquillity within National Landscapes?

- 1.1.33 No comment

12.18 - Are there any omissions in the above policies? Are there any necessary modifications?

- 1.1.34 No comment.

³ Preston City Council Application reference: 06/2018/1297 / 06/2025/0868

⁴ Preston City Council Application reference: 06/2018/0867 / 06/2020/1136 / 06/2025/0647