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# Examination of the Central Lancashire Local Plan

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## Comments from the Inspectors 12<sup>th</sup> January 2026

### 1. Inspectors' comments on Neighbourhood Plan Housing Requirement

Further to our discussions during the Plan Hearing Sessions regarding the Plans provisions in relation to the housing requirement for Neighbourhood Plan Areas. The Framework is clear that plans should contain strategic policies which set out a housing requirement for designated Neighbourhood Areas. The Plan area contains a number of designated neighbourhood plan areas but contains no indication of the housing need for these areas. The Framework sets out circumstances where the Local Planning Authority might provide an indicative figure, but these do not apply to the Plan in this case.

To arrive at an appropriate NP requirement the Council will need to assess the capacity of each NP area to deliver housing and arrive at an appropriate figure for future growth. This should take account of relevant physical and economic constraints, as well as any other factors the Council consider to be relevant. As the need to provide a NP requirement only applies to designated NP areas, the Council may choose not to carry out this exercise for every settlement.

We appreciate that a Plan wide capacity assessment is likely to require substantial new work. In light of this and in light of the fact that the Plan area has only a relatively limited number of designated NP Areas, the Council may, as a first step, consider reviewing completions, allocations and commitments in each designating NP area and taking a view on whether, in light of these, any further housing would be required within these areas, notwithstanding potential windfalls. Should the Council decide that no housing is likely to be required in an NP area, then the requirement would effectively be zero and this matter could be set out in the supporting text of the Plan.

Please let us know your thoughts on this matter along with an indicative timescale for when you intend to carry out this initial work.

### 2. Note on Approach to Agricultural Land

Further to our discussions during the Hearing sessions relating to the loss of agricultural land.

A number of site allocations refer to the potential loss of agricultural land. This relates in part to the requirements of Policy EN16, which we will be discussing next Tuesday 20<sup>th</sup> January.

Notwithstanding this, if a site is to be allocated within the Plan, we need to be assured that the Council have considered any harm that may arise as a result of the loss of Best and Most Versatile (BMV), during the site selection process and concluded, on balance, that this harm would be outweighed by the benefits of the allocation. It would be helpful if the Council could, during the session next Tuesday, draw our attention to where this process is documented in the evidence base. Alternatively, if this matter is not explicitly referred to in the evidence base, explain to us during the session the process that was undertaken and prepare a short note confirming this in due course.

If you have any questions please let me know.

### 3. Overwintering Birds

Further to our discussions during the Hearings regarding the matter of “overwintering birds”. The Integrated Assessment (IA) identified that a likely significant effect on the Integrity of a number of “European” nature sites could not be ruled out. As a result the HRA recommended that the Plan required measures to be put in place to assess likely impacts on overwintering birds from development on a number of site allocations. Should individual or cumulative impacts be identified then mitigation will need to be secured prior to development taking place. This is set out on P51 of the HRA and reproduced below:

- A commitment to mitigation is also required within the Local Plan dependent on the findings of bird surveys. **This commitment should be referred to in in Policy EN7: Designated Sites for Nature Conservation.** This will need to take into account the cumulative numbers of SPA and Ramsar site birds affected within the relevant site allocations as they come forward for development. In the unlikely but possible event that cumulative numbers of SPA and Ramsar site birds affected are likely to exceed thresholds of significance (i.e. >1% of the associated Habitats Site), appropriate mitigation in the form of habitat creation and management in perpetuity, either on-site or through provision of strategic sites for these species elsewhere within Central Lancashire, will be required. If required, mitigation will need to create and manage suitably located habitat which maximises feeding productivity for these SPA/Ramsar species, and such mitigatory habitat would need to be provided and be fully functional prior to development which would affect significant numbers of SPA and Ramsar site birds. Due to the common and widespread nature of the habitats present it is considered with certainty that mitigation can be easily achieved through the creation of alternative habitat of equal or greater value should a significant number of qualifying birds be found to utilise habitats within the relevant site allocations. This approach has been approved at recent Examination in Public for other coastal Local Authorities, including North Essex Authorities.

We note that the report states that cumulative effects are unlikely and that mitigation is likely to be easily achieved. We note the reference to North Essex but are aware that the circumstances in North Essex were not comparable to those which are present at this Examination. In the absence of a collective approach, in the case of cumulative impacts, the “burden” of mitigation, if it is required, is likely to fall on sites which come forward later in the plan period. We need to be assured that this matter is unlikely to have an impact on the delivery of these sites.

It would therefore be helpful if the Council could seek the advice of LUC and potentially Natural England as to:

- How likely is the need for mitigation ? How will the threshold for mitigation be determined and given that each site will be assessed individually, how will the Planning Authority assess whether it has been breached ?
- What is the extent and nature of any likely mitigation ? What might this entail? How local does mitigation have to be to the development site for it to be effective ? What sort of measures are required to ensure the alternative habitat “created” is of equal or greater value?
- Do the impacts identified lend themselves to collective off-site solutions ?

In short, in coming to a view as to how likely this matter is to impact upon housing delivery, do we have evidence to support the view that in practice the matter is unlikely to impact upon a significant proportion of the housing supply and that if it does, mitigation can be readily secured without an undue cost burden on development.

We would be grateful for your views on the above and await your advice on how you wish to proceed. We will be discussing over-wintering birds in relation to EN7 at the session on the 20th so that may be a good time to explore the matter further. If you have any questions in advance of that please let us know.

Anne Jordan and Alison Partington

Inspectors

12<sup>th</sup> January 2026