



Planning Inspectorate

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Gayle Wootton – Director of Property and Planning, Chorley and South Ribble Councils.

Dear Sir and Madam

Examination of the Central Lancashire Local Plan 2023 - 2041 Post Hearing Advice – Further Work and Related Matters

Introduction

1. Further to the recent hearing sessions for the Central Lancashire Local Plan (the Plan) we are writing to confirm the next steps for the Councils in relation to the examination. We would like to take this opportunity to re-iterate our thanks to you and your colleagues for your constructive and helpful approach throughout the examination.
2. As we set out during our hearing sessions, including the final session on 3 February 2026, we are satisfied that the Councils have complied with the duty to cooperate. We have also concluded that the Plan, as submitted, is not sound and that additional work will be required to address our concerns, as set out below. You have requested that we make main modifications of the Plan to address soundness and legal compliance concerns.
3. However, the Minister of State for Housing and Planning (in his Letter to the Chief Executive of the Planning Inspectorate of 9 October 2025 (the Minister's Letter of October 2025)) has made it clear that "overly long" examinations should be avoided, and this consideration along with his expectations relating to "examination flexibilities" are relevant to what we set out below. It follows that at this stage we will highlight our conclusions on the key issues of soundness, before dealing with detailed matters relating to the wide range of main modifications required, which critically, include a recommendation for an early review of the Plan.

Housing Requirement

4. The Plan requirement is based on a Local Housing Need (LHN) figure of 944 dwellings per annum (dpa) with an uplift for employment related housing need, and with a further uplift to meet the provision of the transitional arrangements. For reasons to be set out in our report we are not seeking to increase the housing requirement to reflect the latest LHN figures. We are also satisfied that as the housing requirement met 80% of the LHN at the point of submission, the Plan meets the requirements of paragraph 234a of the NPPF 2024 and can therefore be examined under the NPPF December 2023. The Plan sets out an individual requirement for each authority. For the reasons to be set out in our report we see no reason to alter the apportionment arrived at by each of the constituent authorities.

Housing Land Supply

5. Based on the evidence supplied to us to date we are unable to conclude that Chorley or South Ribble have a housing supply that meets the identified requirement for the Plan period. Neither does the combined housing supply for all three authorities meet the housing requirement set out in the Plan. We are also not assured at this stage that Chorley or South Ribble can demonstrate a 5-year housing land supply. In light of this, and to address matters which were identified at the hearings, the Councils should review the housing supply evidence as follows:
 - Lead-in times should be reviewed, particularly with regard to outline planning permissions to take account of the time between the grant of outline permission and the submission of the reserved matters. The information should provide evidence on how long it takes from when an application (outline or full) is validated to the first completion on site, and from when an application (full or reserved matters) is approved to the first completion on site. This data should be used to sense check, and where necessary revise, the estimated development timeframes provided by site promoters.
 - Sites should only be included in the 5 year housing land supply if they meet the definition of deliverable sites set out in the NPPF and further explained in the 'Housing supply and delivery' Planning Practice Guidance (Paragraph: 007 Reference ID: 68-007-20190722 Revision date: 22 07 2019). The trajectories in the Plan, along with the overall housing land supply tables for each district (HO18 d-f), should be updated on this basis taking into account our other detailed comments made on various sites at the hearing sessions. In addition, the trajectories in the Plan should include details for all the allocations in the Plan. We may provide further comments on the contents of the updated trajectory in due course.

- The Councils should review the assumptions in relation to delivery from City Centre Sites in Preston. The development of some of the identified sites¹ in the city centre could act as a catalyst for the development of the other 9 allocations and the 5 other stalled sites² which are included in the overall housing land supply. We consider it unlikely that all these 14 sites will come forward within the Plan period but determining which sites are likely to come forward, and when, at this stage, is difficult to predict. Whilst all the sites should remain as allocations in the Plan, to take a more realistic approach to deliverability, within the trajectory a contribution of 50% of the yield from these 14 sites should be included as a single figure and spread equally over the last 5 years of the Plan period.
- A number of the housing sites have planning applications pending at present. Latest assumptions on when planning applications are likely to be determined should be included with your response.
- We consider the windfall allowance for Chorley and South Ribble to be overstated. For Chorley the allowance reflects a period when the adopted Local Plan has been out of date, which would no longer be the case once this Plan is adopted. Furthermore, as the Councils have indicated that all suitable, available and achievable sites have been allocated, we consider it inappropriate to include an allowance for large windfall sites and so this should be removed from the allowance. Moreover, we consider that the figure used to calculate the small windfall should be significantly lower than the average historic delivery rate of small windfall sites in each district and we suggest a reduction of at least 10%. The windfall allowance should be applied to all years beyond the 3 years of extant permissions.
- A windfall allowance has not been included for Preston, and the Councils consider the available data not to be as robust as that for the other districts covered by the Plan. Nevertheless, windfalls have contributed to historic supply in the City. Accordingly, the Councils may wish to re-visit the available data to consider whether a windfall allowance could be included for Preston and should provide us with the reasoning for any figure arrived at.
- We find no reasoned justification for the use of a stepped trajectory in Chorley. Supply in this area is not overly reliant on strategic sites or major infrastructure improvements to the extent that delivery would be impeded in the five years post adoption. Consequently, a stepped trajectory is not justified and the trajectory should be adjusted to reflect this. The authorities should also take a consistent approach to whether the figures represent a minimum, maximum or approximate yield for the site. We consider an approximate yield

¹ HS4.6, HS4.29, and 77 Tithebarn Street

² The 5 sites are: 21-23 Lord Street; Ribchester House; 33-34 Winckley Square; The Guild Tower; and Miller Arcade.

to be most appropriate and the wording of the table for each authority should be amended accordingly to highlight this.

- In the light of the changing circumstances set out at the hearing session, a Statement of Common Ground between Homes England and the Central Lancashire Authorities with regard to HS4.3 Land at Eastway should be provided. This should set out the proposed uses and yields on the site, together with the correct boundary for the site. The Key Development Considerations for this site should be updated accordingly.
- With regard to the ability to provide safe and suitable access for HS2.34 & HS2.37 and HS2.36, as advised at the hearings, and notwithstanding the additional material provided to date, we require further clarification in relation to how and whether highway safety matters can be addressed before these sites can be included within the housing supply figures. The implications of any necessary mitigation measures in terms of viability and site yield should also be assessed. The work should inform any necessary adjustments to the Key Development Considerations for the sites.

Site Specific Policies

6. The Plan contains information for a number of allocations within the appendix. However, some of this information is not site specific and should be reviewed. Moreover, all material relating to specific sites should be set out either in the relevant allocation policy or its reasoned justification and this should only be where it is necessary to direct development of the site. All other information should be removed.
7. The Plan also contains a more detailed site-specific policy for each of the strategic sites. During the hearing sessions a number of proposed amendments to the wording of each of these policies was discussed. For each of the strategic sites, the Councils should produce a revised draft of the policy wording for our initial review which will then be used to seek the informal views of the site promoters prior to consultation on the Main Modifications. In relation to SS5 Preston West, this should reflect the Councils revised assumptions regarding the proportion of the site to be given over to employment uses. In relation to SS6A and SS6B Pickering's Farm and EC6.1 Cuerden, we will provide specific wording that should be included in relation to these allocations.

Neighbourhood Plan (NP) Requirement

8. The NPPF is clear that plans should contain strategic policies which set out a housing requirement for designated neighbourhood plan areas. Although the Plan area has a number of such areas it contains no indication of the housing need for them. Whilst the NPPF sets out circumstances where local planning authorities might provide an indicative figure, these do not apply to the Plan in this case.

9. To arrive at an appropriate NP requirement the Councils would need to assess the capacity of each NP area and arrive at a figure for future growth which takes account of relevant constraints, as well as any other factors the Councils consider to be relevant, including the strategy for the overall pattern and scale of development set out in the Plan and any relevant allocations. As the need to provide a NP requirement only applies to designated NP areas, the Councils may choose not to carry out this exercise for every settlement.
10. We appreciate that a Plan wide capacity assessment is likely to require substantial new work, which may cause significant delay to the progress of the Plan. We also note that there would appear to be limited indication that many Neighbourhood Plans will be progressed in the Plan area in the near future. In light of this, and our conclusions in relation to the need for an immediate review set out below, the Councils may consider it more expedient having reviewed completions, allocations and commitments in each designated NP area to take a view on whether, in light of these, any further housing is required to be delivered through NPs within these areas. If the Councils conclude that there is no additional need over and above that set out in this Plan, then the NP requirement for each designated area should reflect the total of the completions, commitments and allocations for that area. These conclusions will need to be set out within the Plan text.

Gypsy and Traveller and Travelling Showpeople

11. The GTAA identifies a significant level of unmet need for Gypsy and Traveller pitches over the Plan period and representations indicate that Travelling Showpeople households in adjacent districts may also be seeking suitable sites in the Plan area.
12. At present the policy allocates two sites and safeguards them for Gypsy and Traveller pitches, one of which, at Hut Lane, is in the Green Belt. These sites are both existing authorised sites and therefore do not need to be allocations. Instead, they should be safeguarded as existing sites, together with the newly authorised site at Town Lane. The wording of the policy and the notation on the policies map should reflect this. Notwithstanding this, if it is considered that the site at Hut Lane should be removed from the Green Belt, it would need to remain as an allocation.
13. The only site identified in the “call for Sites” was the site adjacent to the existing site on Hut Lane, but there is no evidence to show that the Councils have done a thorough assessment of other potential sources of supply, including their own vacant and underused landholdings, to identify potential sites. A comprehensive assessment of this land should be provided covering the entire Plan area with clear reasoning as to the potential suitability or otherwise of the site. In the light of these findings, we will reach a view on whether the Councils’ approach in relation

to Gypsy and Traveller provision is sound, or whether Main Modifications may be needed to provide an effective, justified and national policy compliant response to this issue.

Affordable Housing

14. Policy HS7 requires that where a commuted sum is paid in lieu of on-site delivery of affordable housing, a 20% supplement is to be paid to cover the costs of the administration of the affordable housing commuted sum. At present, no evidence has been provided to justify this figure. The Councils therefore need to provide evidence setting out the additional costs involved in the administration of these sums and how the 20% has been calculated. This should take into account the administrative and monitoring costs already included in S106 agreements.

Employment Land Need and Supply

15. We consider it appropriate to use past supply as a means of assessing the future requirement for industrial and warehousing. However, we find no sound reason for using net projections in Chorley and South Ribble and this should be reviewed and reassessed.
16. The Plan does not currently provide a clear picture of existing supply, and although some of this information was provided during the hearings, the supply of sites should be set out clearly in the Plan text. Existing long term employment sites, such as Alstom can be included as allocations, but should not be included within the employment land supply.
17. Those parts of sites EC5.3 and EC5.7 which are subject to flooding should be removed from the employment supply. Mixed use sites should be reviewed to identify those parts of the site to be used for employment and the contribution to employment land supply updated accordingly. We note that site EC2.2 is now subject to a permission for an alternative use and should also be removed from the supply.
18. We discussed at the hearings the contribution the site at Cuerden is likely to make to employment supply. We note that the Councils have provided additional information since the hearings and will respond on this matter in due course.
19. Preston provides a significant proportion of the employment land allocated in the Plan. A large proportion of this is made up of long-standing employment allocations which have been slow to come to market. Furthermore, sites in north-east Preston will need to provide significant mitigations to address off-site transport impacts and this raises issues in relation to deliverability, at least in the short term. We have also found that the assessment of employment land need is deficient in that adequate consideration has not been given to whether there is a wider regional or sub-regional need for logistics development. Neither does the

Plan address the potential for additional employment growth from the location of the National Cyber Force at Salmesbury along with any resulting employment related housing growth that may arise from it. We note that the latter matter has arisen late in the Plan making process. These matters, if relevant, would be likely to give rise to need in the medium to longer term, and so, although they represent a shortcoming in the Plan, we consider that they could be adequately addressed through a timely Plan review.

Employment Sites and Use Class E (g)

20. Policy EC7 seeks to support the on-going function of existing employment areas and premises by defining the circumstances in which changes of use from employment uses will be supported. The policy seeks to restrict changes of use within the E class to those within the previous use class B1. However, the aim of the changes to the Use Classes Order is to facilitate a wider range of uses within employment areas and so a blanket removal of such rights would not be consistent with the aims of national policy. Moreover, in the absence of an Article 4 Direction it is unclear how changes within the E class could be restricted. Neither has it been demonstrated that Article 4 Directions are being prepared, and if they are to what extent the Councils consider they could meet the relevant tests set out in the NPPF. As a result, the policy is also ineffective in these terms. Whilst conditions could be attached to any new permissions for developments which would fall into the former B classes, the NPPF is clear that such conditions should not be used unless there is a *clear justification* to do so.
21. There may be locations within the Plan area where the loss of existing employment units to uses outside the previous B Use Classes would undermine the ongoing functioning of an employment area. Nevertheless, the Councils have not undertaken a qualitative assessment of all the sites intended to be covered by this policy. Such an assessment is likely to require additional time and resources to undertake and in the absence of an Article 4 Direction would not, in any case, render the policy effective. We are therefore recommending that the policy be revised to make clear that it relates only to changes of use outside Class E. Should the Councils wish to impose further restrictions then this matter should form part of the review of the Plan, alongside a consideration of how such a policy could be effectively implemented through the development management process.

Overwintering Birds

22. The cumulative impact of selected sites on overwintering birds was identified as a matter to be mitigated in the Habitats Regulations Assessment. Although the report states that cumulative effects are unlikely and that mitigation is likely to be easily achieved, we nevertheless need to be assured that there is a reasonable expectation that mitigation can be delivered as part of development and would therefore be unlikely to have an impact on the delivery of the relevant sites. We

note that additional information has been provided following the hearings and we will respond to this matter in due course.

Site Selection

23. A number of “Key Development Considerations” refer to the need for an agricultural land classification report as part of a planning application if the land is best and most versatile. Policy EN16 also refers to this requirement for new development. We do not consider this to be a reasonable requirement because if a site has been allocated in a Plan the harm arising from loss of agricultural land should have already been taken into account during the site selection process.
24. This requirement for allocations should be removed from policy EN16 and any site-specific policy in the Plan. The Councils should also demonstrate whether, in allocating sites, areas of poorer quality land have been preferred to those of higher quality in the site selection process in order to achieve consistency with national policy on this issue. We note that further information has been forwarded to us since the hearings and will respond on this matter in due course.

Supplementary Planning Documents

25. The Councils will be aware that under the forthcoming changes to plan-making the final date for the adoption of new Supplementary Planning Documents (SPDs) will be 30 June 2026. This will mean that there will be limited scope for the Plan to rely on SPDs to put into force policies within this Plan. The Councils should therefore review the Plan to ensure that references to the provision of future SPDs (that is those that would be adopted after 30 June 2026) are removed from the Plan by way of main modification in the interests of effectiveness.
26. The Councils should reflect on whether this action would have adverse implications for the deliverability and thus the effectiveness of the Plan’s policies. This should be accompanied by a note on whether consequential modifications may be needed to address this, which should also set out the Councils’ view on whether means other than SPDs may be available to assist with the implementation of the Plan’s policies.

Green Infrastructure

27. To avoid confusion a consistent approach needs to be taken by all three authorities on what constitutes green infrastructure (GI) and how it is shown on the Policies Map. There would appear to be considerable overlap between what falls within the definition of sites covered by Policy HC6 and what is covered by Policy EN5.

28. Furthermore, the evidence base does not currently explain how sites shown on the Policies Map as either HC6 or EN5 have been identified and assessed. Not all of the sites identified as GI would appear to have been assessed in the Open Space Assessment Document. For the policy to be effective and justified a comprehensive assessment of all identified sites would need to be provided using a consistent and rigorous methodology that shows why sites have or have not been identified on the Policies Map. Such an assessment is likely to require additional time and resources to undertake. Furthermore, we do not consider that the absence of a policy in relation to GI would render the Plan unsound. We are therefore recommending that the policy be removed and that the matter forms part of the review of the Plan. We note that the Policy EN5 contains 2 allocations at Harrison's Farm, Adlington and Central Park in South Ribble. The Councils will need to consider how these can be incorporated within the Plan.

Transport and Infrastructure

29. We note that National Highways and Lancashire County Council (the local highways authority) have collaborated with the Councils to produce an updated Infrastructure Delivery Plan. However, this should be further revised to identify mechanisms for delivery and funding sources. Where funding is expected to come forward from developer contributions, the evidence supporting the Plan should demonstrate that the viability implications of this have been adequately assessed. We note that an indicative figure of £20K per dwelling has been used within the Whole Plan Viability Assessment to take account of infrastructure provision, although limited information is available to support the use of this figure. Whilst we are mindful that assumptions often necessarily use a "broad-brush" approach, the Councils should nonetheless provide some additional supporting evidence that the assumptions used have been sense-checked, and, where possible using instances from delivery of sites within the Plan area, demonstrate that infrastructure delivery costs have been in line with the assumptions used.

30. The Councils have also worked with Lancashire County Council as local education authority to identify education infrastructure needs arising from the development proposed in the Plan. We note that the Plan does not safeguard all land needed for education, in particular, there is an identified need for a secondary school in Chorley that is not met by the Plan. A revision to Policy ID2 would assist in the delivery of a school site should it arise through a windfall; however, this alone would not represent a sustainable means of meeting such infrastructure needs. The Plan is therefore not consistent with the NPPF in this respect, which expects that local planning authorities should take a proactive, positive and collaborative approach to meeting the requirement for new school places. Accordingly, this is again a matter that would need to be promptly revisited in the review of the Plan that we recommend.

Policy Map Changes

31. Although changes to the Policies Map fall outside our remit the Councils should, where necessary, update their list of identified changes so we can assess any implications for the implementation of policies within the Plan.

Review of the Plan

32. During the hearings we discussed the adequacy of the Plan's arrangements for monitoring. We have identified above our concerns in relation to the identified deficiencies in housing supply in Chorley and South Ribble, deficiencies in the amount of employment land supply in Chorley and concerns regarding the potential delivery of employment land within the remaining identified supply. We are also of the view that the Plan should recognise the longer term need to address higher levels of housing need and to address issues in relation to the range of sites within the employment land provision. The effects of the development of the National Cyber Force headquarters on both housing and employment requirements are also likely to be relevant considerations in the medium to longer term outlook for the Plan area. The Plan also fails to provide adequate education infrastructure within Chorley, and this should be addressed via a plan-led process rather than as a result of windfalls – particularly in view of the existing evidence on the availability of sites of a sufficient size. Additional work will also be necessary to justify the inclusion of policy EN5 in relation to Green Infrastructure
33. When taken together with the other matters we set out above, these are fundamental soundness issues that need to be addressed. We are also mindful that the additional work we have requested above may identify further deficiencies with the Plan in terms of the deliverability of sites and their anticipated yields across the range of development types envisaged.
34. We have considered at this stage whether it would be appropriate to require the Councils to remedy these deficiencies through, for example, the allocation of additional sites within this Plan. However, to do so would cause significant delay in adopting this Plan and so would also ultimately delay the requirement to meet the up to date LHN. To do so would also be at odds with the objectives of the NPPF, the impetus for growth explicit in government policy and the government's expectations relating to examinations set out in the Minister's October 2025 Letter. At this stage, we are therefore minded to recommend that, notwithstanding the transitional arrangements within the NPPF, upon adoption the Councils should begin immediate preparation of a new Plan under the provisions of the forthcoming regulations.
35. However, this initial view is contingent on the further work we request above. If the further work shows that the supply aspects of the Plan have deteriorated further from our assessment of the current position it would be difficult to

conclude that the Plan, even with a commitment to immediate review, would result in the genuinely plan-led approach to development that the Framework expects.

Next Steps

36. We are of the view that the above measures could mean that a plan could be put in place which would bring some benefit by way of additional housing supply over that set out in the existing plans. Nevertheless, in light of the need for an immediate review, we are mindful that the Councils may legitimately decide that an ultimately more productive and efficient approach would be to instead direct the Councils' efforts to commencing a plan under the new plan-making framework as soon as is practicable. Therefore, within 2 weeks of the date of this letter the Councils should advise us on whether they wish to proceed with the Plan on the basis outlined above and if so, when they would be in a position to provide a realistic timescale and project plan for undertaking the work.
37. In setting out a realistic timescale, the Councils should be aware of the Minister's Letter to the Planning Inspectorate of 30 July 2024, which sets out that pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall. The Councils should also be aware that the additional work needed to address the deficiencies we have identified will likely be substantial and introduce new evidence. It follows that, in the interests of fairness, further hearing sessions may be needed to give interested parties the opportunity to address any issues raised.
38. Aside from a response from the Councils we are not inviting, nor are we likely to accept any responses to this letter from other parties.
39. Please feel free to contact us through the Programme Officer if you would like any clarification on the matters set out above.

Anne Jordan

Alison Partington

INSPECTORS