
Central Lancashire Local Plan 2023-2041

Representation on Regulation 19 Consultation Draft



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1. Introduction

- 1.1. Savills (UK) Limited (Savills) is instructed by Tallentine to submit representations on the Central Lancashire Local Plan 2023-2041 Publication Draft (CLLP).
- 1.2. The CLLP, once adopted will set out the strategic level of planning policy for the areas Preston, Chorley and South Ribble. This includes matters such as the overarching spatial strategy, how the region will respond to challenges such as climate change, and set out requirements to ensure new development is of a high quality. Importantly the Plan will also make allocations for development.
- 1.3. The policies of the CLLP will eventually replace those within the Central Lancashire Core Strategy (CLCS) which was adopted in July 2012 and fulfils a similar role. Eventually the local plans of each of the 3 constituent areas will be renewed to reflect the spatial strategy of the CLLP when adopted.
- 1.4. These representations will focus on the CLLP, including supporting Policy Map 3.1, as well as the relevant parts of the published supporting evidence base.
- 1.5. This Regulation 19 consultation on the Publication Draft of the CLLP marks the third formal consultation undertaken as part of the preparation of the consultation. This follows on from the Issues and Options Consultation which closed in February 2020, and the Part One Preferred Options Consultation that ended in February 2023.
- 1.6. This report will be structured in three parts. Firstly, a background will be provided as per Tallentine Ltd (Tallentine), the Local Plan status, and the interest in the Preston and Central Lancashire area. The report will then consider a site which is included as part of an allocation in the draft Local Plan, it then will consider other omission sites under Tallentine's ownership, and finally Part C will consider more general comments on Policies.
- 1.7. As the CLLP has now reached the publication stage, comments made within these representations will be structured around the tests of soundness set out in paragraph 36 of the NPPF.
- 1.8. Paragraph 36 states that plans will be considered to be sound if they are:
 - Positively prepared;
 - Justified;
 - Effective; and
 - Consistent with national policy.
- 1.9. These representations will be structured as follows:
 - Section 2 – Introduction
 - Section 3 – Part A: Policy SS5 – Preston West
 - Section 4 – Part B: Omission Sites
 - Section 5 – Part C: Other Policies
 - Section 6 - Summary and Conclusions.

- 1.10. Overall, Tallentine fully support the plan in principle and welcome the allocation under Policy SS5. However, we wish to submit a **technical objection** in respect of the need for additional homes and to see omission sites (including those set out in these representations) added to the site allocations.
- 1.11. It should be noted that all comments are made in order to assist in ensuring the that CLLP is sound in order to set out an appropriate strategic level of planning policy for Central Lancashire. In general, the CLLP is considered to provide adequate policies and guidance. However, where necessary issues of soundness are raised and amendments suggested to resolve these.

2. Part A: Policy SS5 – Preston West

2.1. The following section will set out Savills’ (on behalf of Tallentine) position on CLLP Policy SS5: Strategic Allocation – Preston West. This includes an assessment of how the policy performs against the tests of soundness set out in the NPPF.

Site and Surroundings

2.2. The site under Tallentine’s ownership is situated in Lea, Preston. Lea is a village in the Preston area and is approximately 4.6km north west of Preston City Centre. The M55 motorway is situated approximately 3km to the north of the site running east to west, providing wider connectivity to Blackpool to the west, and junction 32 of the M6 5.84km to the north east. The M6 motorway connects the area to the rest of England and Scotland.

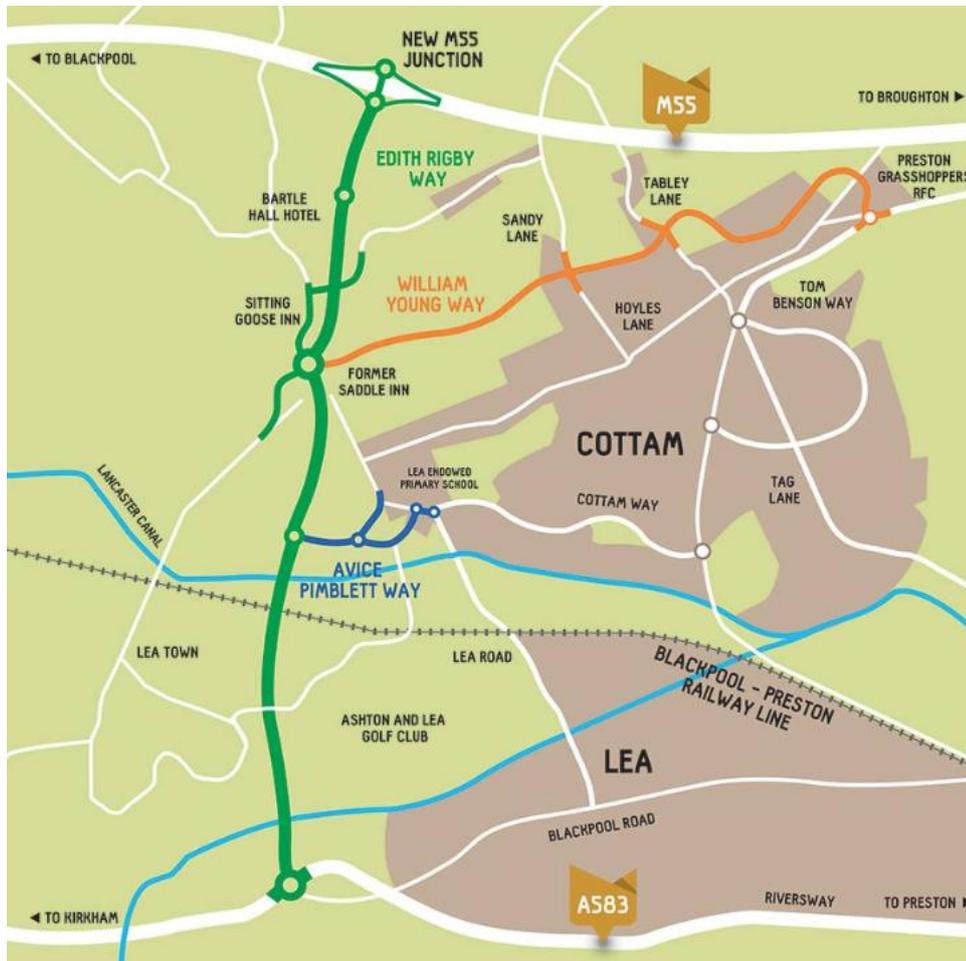


Figure 1: Map showing the location of the EWLR (in green) providing a north - south connection between the M55 and A583 (Source: <https://www.lancashire.gov.uk/major-projects/preston-western-distributor/>)

- 2.3. To the south of the site is Riversway (A583) and Blackpool Road (A5085) which connect the site east to Preston, via the Edith Rigby Way which is also known as the East West Link Road (EWLR)/Preston Western Distributor which connects Riversway/Blackpool Road to the M55 (see Figure 1). The EWLR is located to the west of the site and opened in July 2023 to help relieve congestion on the M55 and routes through Preston.
- 2.4. The surrounding area is predominantly residential area, with more rural land to the west, separated from the site by the EWLR. The site itself comprises mostly agricultural / vacant arable land, with the Ashton & Lea Golf Club located centrally. A railway line cuts the wider site in half, running east to west connecting Preston and Blackpool.
- 2.5. Furthermore, the Savick brook is on the southern boundary of the site, running east to west, with the Lancaster Canal north of this and the railway line. The River Ribble is situated approximately 1.5km south of the site.

Wider Policy Context

- 2.6. The site owned by Tallentine (see Figure 2) partially forms part of the draft allocation set out in Emerging Policy SS5 of the Draft Publication Version Central Lancashire Local Plan (Reg 19). See Figure 3 overleaf for the allocation boundary, with the area owned by Tallentine edged in blue.



Figure 2: Site under Tallentine's Ownership

- 2.7. The policy is generally split into 2 parts. The first sets out general points regarding the proposed allocation, including a description of the Site, summary of the development potential, capacity and Site Location Plan.

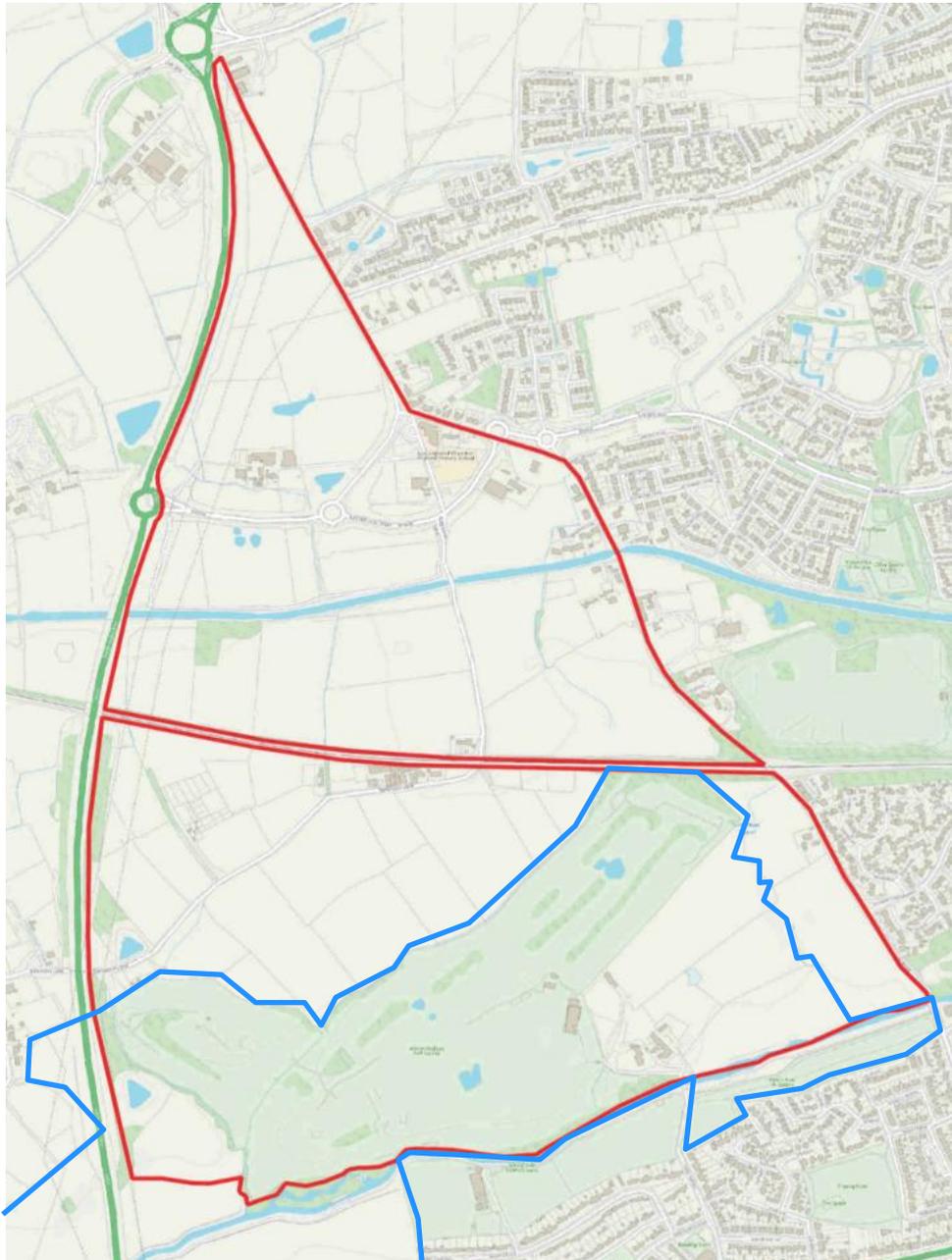


Figure 3: Policy SS5 Draft Allocation Boundary (red line) including Tallentine ownership (blue line)

- 2.8. The second part sets out key development considerations in terms of how the proposed allocation would relate to other policies of the Plan. It should be noted that other policies in the CLLP are still applicable to the allocation and as such are considered in Section 4 of these representations.

- 2.9. The proposed allocation of the Preston West site is welcomed and fits both with the overriding spatial strategy of the CLLP, and also paragraph 125 (c) of the NPPF which states that planning policies should give substantial weight to the value of using sustainably located land within settlements for homes and other identified needs.

Site History

- 2.10. The site has been promoted throughout the Local Plan process, having been submitted for consideration at Regulation 18 stage as 'Land West of Cottam and East of Preston Western Distributor' and carried forward from there. It was met with a number of comments expressing support of the allocation. It has appeared in previous SHELAA's under reference 19P031.
- 2.11. This demonstrates that the wider allocation has long been established to be brought forward for development, which ties in with the Council's ambitions to encourage growth to the North West of Preston, as evidenced by the Cottam Strategic Site which is located north of the Preston West draft allocation. Thus, there is significant development in the locality which demonstrates the suitability of the site to fulfil the Council's vision, as well as its deliverability, and the allocation represents a logical extension of existing, and upcoming development.

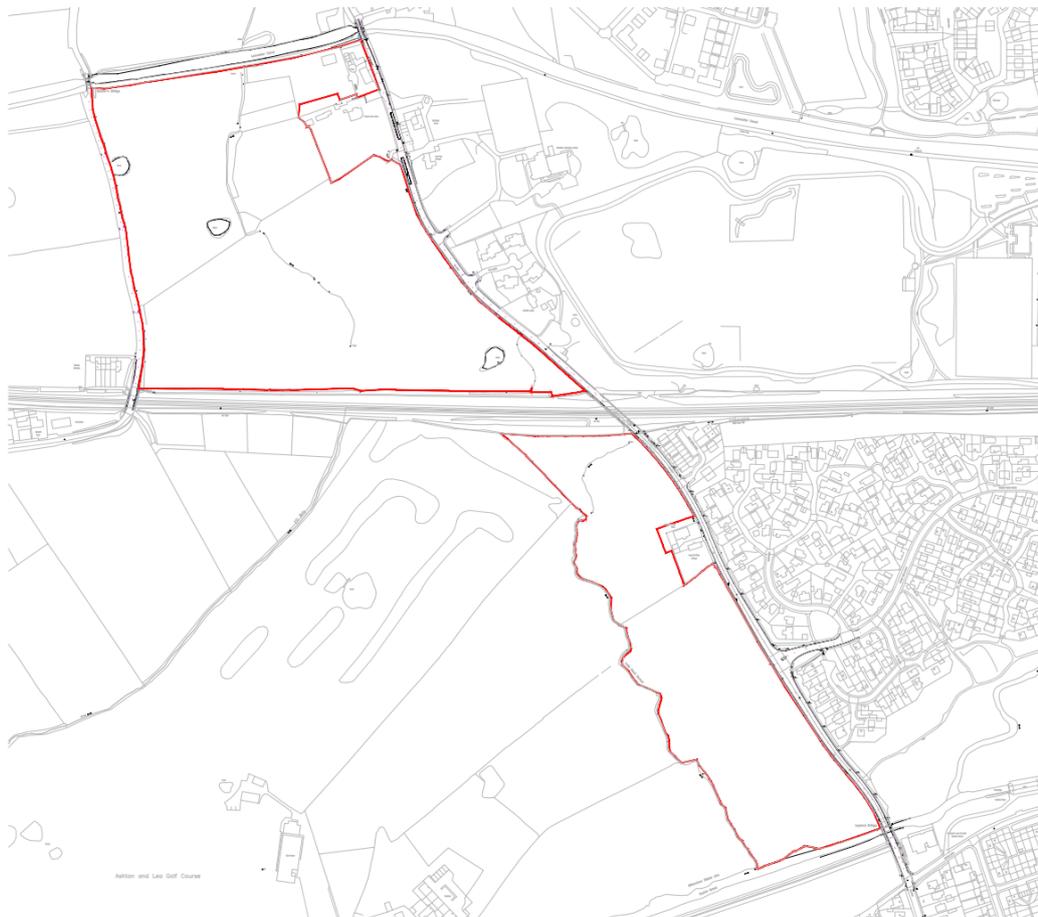


Figure 4: red line boundary for application 06/2022/1101

2.12. The draft allocation acknowledges that part of the site has a resolution to grant permission, which is subject to a Section 106 agreement. This is summarised below for context.

2.13. A Hybrid planning application was submitted in 2022 under reference **06/2022/1101** with the following description of development:

“Hybrid planning application: 1) Full planning application for 161no. dwellings (northern parcel); 2) Outline planning application for residential development of up to 120no. dwellings, (access applied for only and all other matters reserved for subsequent approval) (southern parcel).”

2.14. Figure 4 sets out the red line for the application which is situated north east of the site, including a parcel to the south of the railway and a parcel to the north. The applicant is Story Homes.

2.15. Furthermore, in the centre of the draft allocation boundary, to the west of the above hybrid application jurisdiction are proposals for a new railway station known as Cottam Parkway, submitted under application reference **06/2022/1151** which was granted in September 2023. Figure 5 includes the red line for the proposed railway station.

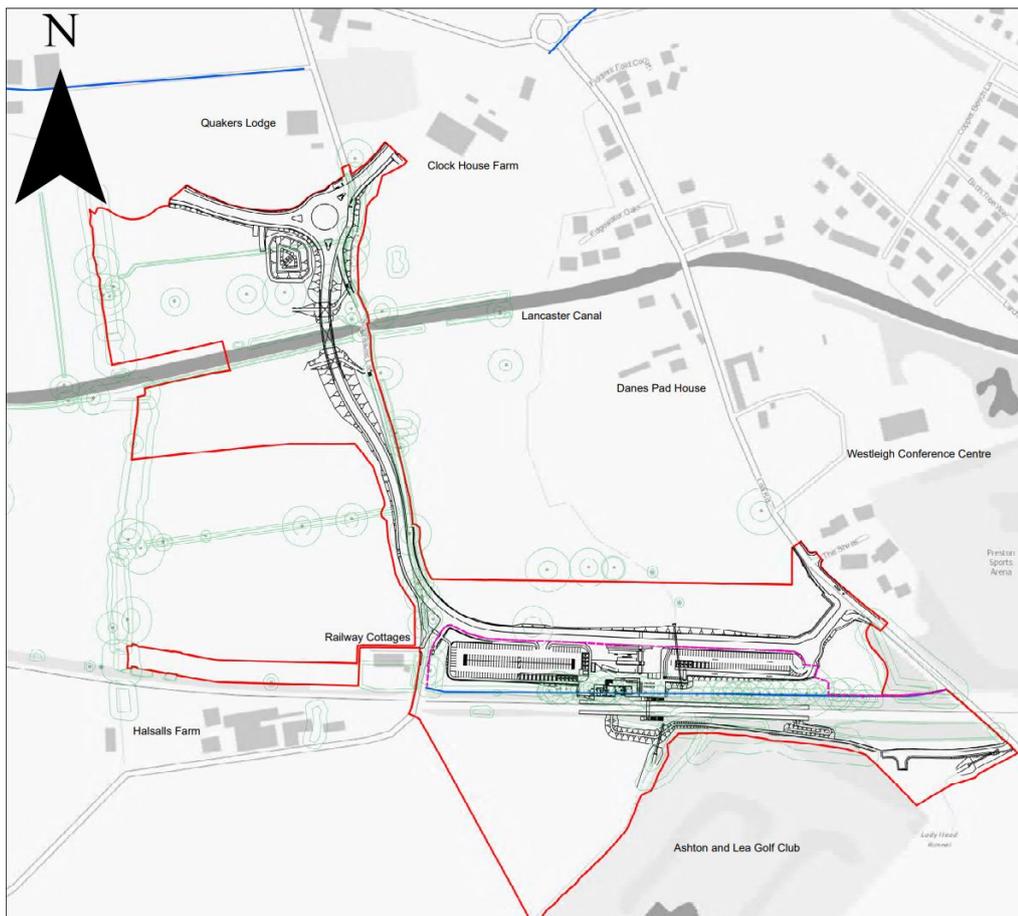


Figure 5: Site Plan for the proposed Cottam Parkway Railway Station

- 2.16. The above planning applications within the allocation boundary only serve to further support its principle, demonstrating that the infrastructure exists to support further development coming forward and that the allocation is deliverable, and overall, the allocation is agreed to be sound.

Policy SS5 - Representations

- 2.17. As aforementioned, Tallentine are fully supportive of Emerging Policy SS5.
- 2.18. In a similar vein to Part 1 of Policy SS5, the general principles set out are supported.
- 2.19. Tallentine is a willing landowner in terms of supporting future development and is keen to be part of the engagement with the Council to ensure the site can come forward and deliver the Council's vision. Tallentine have owned land in the area for generations and always engage positively with statutory authorities and other bodies in connection with the provision of infrastructure and development, as well as being custodians of the land and wider landscape.
- 2.20. Tallentine wish to work proactively with the other landowners at Preston West to progress the allocation and to assist on demonstrating its deliverability. They would welcome the opportunity to discuss this with the Council at the earliest opportunity.

3. Part B: Omission Sites

3.1. In addition to Part A, this section will include other sites which are currently omitted from the draft local plan. Tallentine wish to put them forward for consideration before the plan is adopted. The following sites will be considered in this section:

- Site 1 – Hospital Crossing, off Bank Head Lane, PR5 6YP (South Ribble)
- Site 2 – Land adjacent to Victoria Road, PR5 4JA (South Ribble)
- Site 3 – Land off Higher Walton Road, Walton-le-Dale PR5 4HD (South Ribble)
- Site 4 – Land off Blackpool Road, PR4 0XB (Preston)

3.2. The above sites are considered below, with a brief background and overview of site constraints, as well as deliverability time scales.

Site 1 – Hospital Crossing

3.3. The site is a small parcel of land located to the south east of Preston, in the Bamber Bridge area. It is situated approximately 150m to the west of the M61, around 940m to the north west of junction 2. The M6 is just under 1km to the west, and the site is bound by an existing railway line on its southern edge. The site itself is vacant, comprising greenfield land, and to the south west of the site is the established industrial estate known as Walton Summit Centre. There is another smaller parcel of commercial development to the north east of the site. Residential development extends to the north west and south east, with greenfield land extending further to the east, beyond the M61.

3.4. Figure 6 below depicts the extent of the site in its wider context.

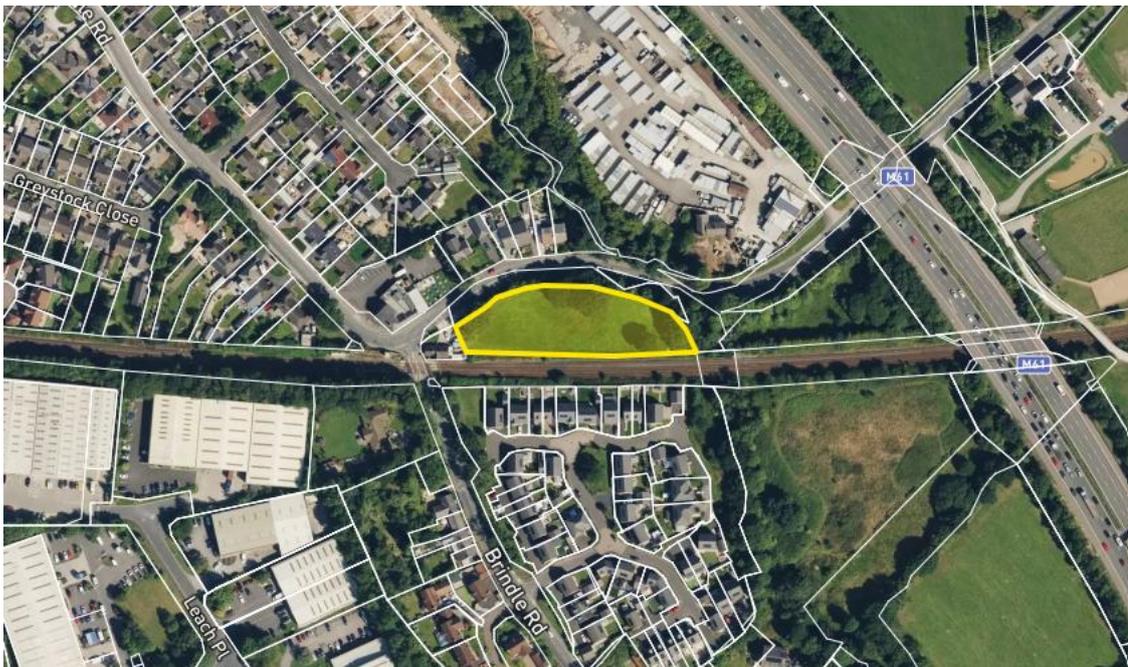


Figure 6: Extent of Site 1 - Hospital Crossing

- 3.5. The site has been previously considered as part of call for sites (reference 19S108) and SHELAA assessments, and was ruled out given its designation as a 'Green Corridor' in the South Ribble Local Plan. The extent of this allocation is set out in Figure 7 below. As aforementioned, it is also adjacent to the Walton Summit Centre, which is allocated as being a protected employment site.



Figure 7: Extract from the South Ribble Local Plan Policy Map (now superseded) (Source: <https://southribble.gov.uk/downloads/file/607/local-plan-policies-map-main-urban-area>)

- 3.6. The purpose of Green Corridors is set out in the draft Local Plan as 'areas or routes which provide for walking, cycling or horse riding, whether for leisure purposes or travel. May also offer opportunities for wildlife mitigation' and the CLLP indicates that green corridors will be carried forwards as Green Infrastructure.
- 3.7. With this in mind, the inclusion of the site as green infrastructure is not clear, given that it is an isolated parcel of land, bound by a railway line, roads and the M61 to the east with the large and established industrial estate Walton Summit Centre extending south west of the site and residential development to the south and north. There is also further commercial development north east of the site.
- 3.8. Paragraph 7.23 of the CLLP sets out that the green infrastructure in Central Lancashire will complement and contribute to the emerging Lancashire Local Nature Recovery Strategy (draft of which is due to go live for consultation now, to be published summer 2025), driving nature recovery locally and providing wider environmental improvements and forming part of the national Nature Recovery Network. Green Corridors are highlighted as a part of this green infrastructure.
- 3.9. It is noted that the South Ribble Local Plan had a specific Green Corridor / Green Wedges policy. The Draft Local Plan supersedes this policy with HS5: Open Space and Playing Pitch Requirements in New Housing Developments.
- 3.10. The draft new policy does not prevent the development of green infrastructure sites, for example in Emerging Policy EN5 it is set out that development should provide enhancements to existing infrastructure

and that development which does not lose or degrade existing green infrastructure can be considered acceptable so long as they are effectively mitigated.

3.11. Furthermore, the interactive map for informing Nature Recovery in Lancashire County Council **does not** highlight Site 1 as an area of particular ecological / environmental importance. Given it is due to be published this year, this is considered to have increasing weight.

3.12. The site is situated in a sustainable location, surrounded by existing development and in this way represents appropriate infill development in accordance with national planning policy. It is also stressed that its allocation as a Green Corridor is questionable, but nonetheless this should not impede its development. As such it should be **considered for allocation for development** and would be suited to either residential or commercial development.

Site 2 – Land adjacent to Victoria Road

3.13. The site is a small parcel of isolated land, surrounded mostly by industrial development, with the River Darwen running along its southern boundary and the A6 along its northern boundary. Industrial and commercial development extends to the north east and north west of the site, with farmland to the south on the other side of the River and residential development extending to the south east of the site. The site is situated on the south western side of Preston.



Figure 8: Extent of the Tallentine ownership at Site 2

3.14. It is acknowledged that the site is currently designated as part of the Green Belt and wholly encompassed by Flood Zone 3, hence has been previously ruled out for residential development (SHELAA reference

19S070). It is also in proximity to Grade II listed buildings and scheduled monuments which are constraints of the site.

- 3.15. The SHELAA notes set out that the site is in Flood Zone 3, however has no history of flooding recorded and the site could be potentially discounted if the development cannot be directed away from areas of flood risk.
- 3.16. As aforementioned the site is wholly in Flood Zone 3 and as such less sensitive uses such as industrial / commercial development should be considered on the site. This would reflect the precedent that has been set in the immediate locality, where industrial and commercial development is located in Flood Zone 3.
- 3.17. Stipulations could be made to manage and mitigate the risk of flooding which could be of benefit to the locality, in which case the site should be considered to come forward for **allocation for development**. Tallentine would like to request that this is considered further as part of the Local Plan due diligence, and to ensure a sound plan is adopted.

Site 3 – Land off of Higher Walton Road

- 3.18. Site 3 is situated to the south east of Site 2 in the Walton-le-Dale area. It is bound on its eastern side by the River Darwen with the A675 along the North, providing connections to the Preston Bypass (M6/M61) to the east. Currently the site comprises existing separately-let market garden land.

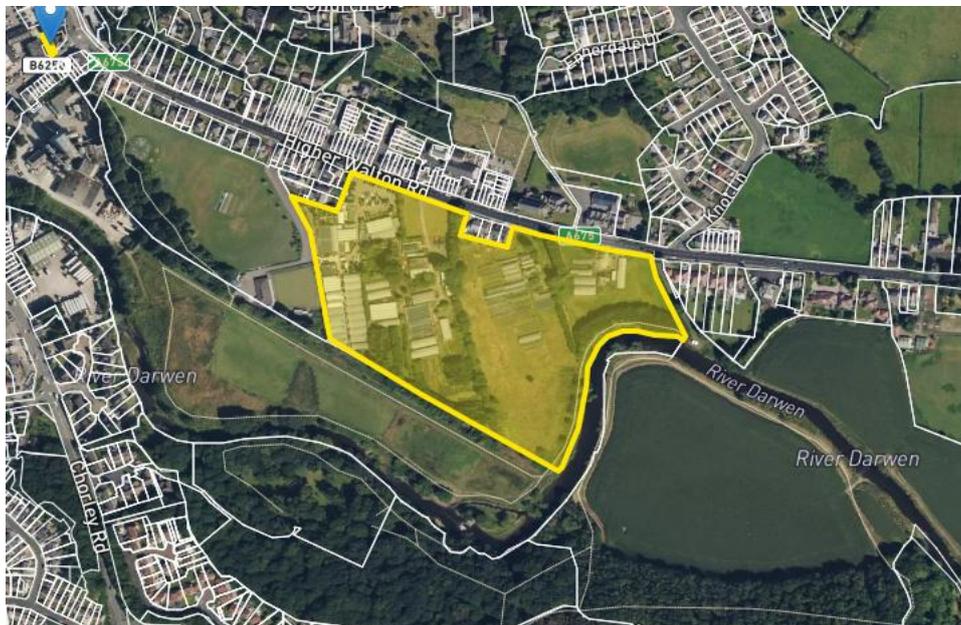


Figure 9: Extent of Site 3

- 3.19. Previous SHELAA submissions (reference 19S105) resulted in the withdrawal of this site due to its location wholly within Flood Zone 3 and its location as a Green Belt site. Nonetheless, as aforementioned, the site is previously developed and therefore represents previously developed land in the Green Belt. As such it

is a good grey belt candidate site in an already established built up location. It should therefore be **considered for allocation** as part of Local Plan sites being brought forward.

3.20. The NPPF sets out in Paragraph 148 the following:

“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”

3.21. Thus, this hierarchy is important as Site 3 is at the top of the (Green Belt) hierarchy being previously developed land. As aforementioned, it is adjacent to residential development with industrial and commercial development to the west. As such it would be compatible for a range of development types. However given its location within Flood Zone 3, Tallentine acknowledge that an employment allocation may be more suitable here.

3.22. Further, the NPPF sets out in paragraph 143 that the Green Belt has 5 purposes as follows:

- a) *To check the unrestricted sprawl of large built-up areas;*
- b) *To prevent neighbouring towns merging into one another;*
- c) *To assist in safeguarding the countryside from encroachment;*
- d) *To preserve the setting and special character of historic towns; and*
- e) *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

3.23. Given that the site is physically isolated by the River Derwent to the south and the Higher Walton Road to the north, its development would not impinge on unrestricted sprawl, and would not result in the merging of towns. It also would not result in encroachment of the countryside, given that the site is already previously developed.

3.24. As such, it is considered that the site makes a limited contribution to the purposes of the Green Belt and **should be considered for future development** in accordance with the new Government’s aims to deliver homes across the country and encourage economic growth through the planning system.

Site 4 – Land off Blackpool Road

3.25. This site is vacant land, located to the west of Preston and as such it could form part of the logical extension of the urban area which is extending in this direction. To the south of the site is the River Ribble, with Blackpool Road (A583) to the north and the junction to the new EWLR. The site is therefore well connected and in close proximity to the draft allocation set out in Emerging Policy SS5. The extent of the site is set out below in Figure 10.



Figure 10: Extent of Site 4

- 3.26. The site currently comprises mostly vacant marshland, and arable farmland, with a new roadside/service station situated to the north west. The site is allocated partially as a Biological Heritage Site in the emerging CLLP, however Tallentine believe it **should be considered as a future development site and potentially form part of Preston West.**

4. Part C: Other Policies

4.1. In addition to Policy SS5, there are other policies of relevance to the delivery of the proposed allocation owing to them being spatially relevant, or generally relevant to the type and scale of development proposed.

4.2. These are discussed below.

Allocations Policies

4.3. As aforementioned in Part A of these representations, Tallentine are fully supportive of the principle of the proposed allocation brought forward under Policy SS5. However, it is our view that in order to ensure a sound and robust plan is brought forward for Central Lancashire, the omission sites set out in Part B of these representations should be fully considered for residential or employment allocations. This is explored in more detail in Section 3 and relates to the following policies:

- HS3 – Housing Allocations South Ribble
- HS4 – Housing Allocations Preston
- EC3 – Employment Allocations Preston
- EC4 – Employment Allocations South Ribble

4.4. The following policies are in addition considered below, which cover more general points to ensure a sound and deliverable plan is adopted.

- HS6 – Housing Mix and Density
- EN5 – Green Infrastructure
- CC1 (Strategic Policy) – Climate Change
- CC3 – Reducing Energy Consumption
- ST2 – Sustainable and Active Travel
- ID2 – Developer Contributions and Planning Obligations

4.5. These are considered in turn as follows:

Policy HS6: Housing Mix and Density

Table 2 - Policy HS6 Soundness Summary

Policy HS6: Housing Mix and Density		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	



Justified	Yes	
Effective	No	Flexibility should be applied in terms of the housing mix requirements to ensure that site specific issues can be responded to. Otherwise this may impact on deliverability.
Consistent with National Policy	Yes	

Amendments Required

Amend limb 1 as follows:

1. All market and affordable housing developments of 10 or more dwellings, or on sites of 0.4 hectares or greater, across Central Lancashire must:

- a) Provide a mix of dwelling types and sizes ~~to~~ **that seeks to** address the needs for that location as identified in the Housing Need and Demand Assessments, **or other relevant evidence, as a starting point. Site specific characteristic may justify a divergence from this mix;** and
- b) Build all dwellings to M4(2) accessible and adaptable standard **unless site specific characteristic mean that this is not possible;** and
- c) Build at least 4% of affordable dwellings on sites in Preston and Chorley, and at least 5% of affordable dwellings on sites in South Ribble, to M4(3) wheelchair accessible standard.

4.6. The amendments suggested add a reasonable amount of flexibility to allow the specific characteristics of sites to be reflected in the mix and accessibility standards, whilst maintaining the aim of the Policy overall.

EN5 – Green Infrastructure

Table 3 - Policy EN5 Soundness Summary

EN5 – Green Infrastructure		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	



Effective	No	The identification of certain sites as Green Infrastructure has the potential to constrain deliverability.
Consistent with National Policy	Yes	
Amendments Required		
Amend the EN5 designation on Policy Map 3.1.		

Policy CC1: Climate Change

Table 4 - Policy CC1 Soundness Summary

CC1 (Strategic Policy) – Climate Change		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	No	The current wording does not provide sufficient clarity to applicants on the requirements of the policy, either in terms of climate change mitigation or adaptation.
Consistent with National Policy	No	The current wording relating to climate change mitigation is inconsistent with the forthcoming Future Homes Standard.
Amendments Required		
Amend text as follows:		
<p><i>1. Development proposals, public realm and infrastructure improvements should maximise opportunities to contribute to the delivery of net zero greenhouse gas emissions (defined here as a negating the amount of greenhouse gases produced by development in operation, to be achieved by reducing emissions and implementing methods of absorbing carbon dioxide from the atmosphere) and be designed, constructed and operated to:</i></p> <p><i>a) Address the mitigation of climate change, including where appropriate, measures to:</i></p>		

i. Reduce greenhouse gas emissions,
ii. Minimise the need to travel and car dependency,
iii. Promote active travel and the use of public transport,
iv. Provide infrastructure to support the transition to zero and low carbon vehicles,
v. Minimise energy and water use and whole life carbon impacts
vi. Encourage waste minimisation and prevention
vii. Maximise energy and resource efficiency and promote a circular economy
viii. Provide carbon storage and sequestration through nature-based solutions
ix. Maximise renewable and low carbon energy generation.

b) Address and reduce climate related risks, **specifically the risks of flooding and overheating**, through adaptation measures where appropriate in order to:

i. Improve the resilience of communities, businesses, infrastructure, and the natural environment to climate change impacts **related to increased temperatures and changing rainfall patterns**,
ii. Integrate green and blue infrastructure to fulfil a range of functions including for flood risk management, sustainable drainage, urban cooling, and biodiversity,
iii. Prioritise the use of nature-based solutions, helping to protect and restore natural environmental assets.

2. Applications for major development proposals should include an Energy Statement to demonstrate how the ~~net zero greenhouse gas emissions~~ **Future Homes & Buildings Standard** targets will be met, and carbon emissions should be calculated through a nationally recognised Whole Life-Cycle Carbon Assessment (**such as RICS Whole Life Carbon Assessment, Professional Standard, 2nd edition**), demonstrating **meaningful** actions taken to reduce life-cycle carbon emissions, **covering life-cycle modules A, B and C.** .

4.7. Limb 1 of the policy states that;

“Development proposals, public realm and infrastructure improvements should maximise opportunities to contribute to the delivery of net zero greenhouse gas emissions...”

4.8. No definition of ‘net zero greenhouse gas emissions’ is provided either within the policy text or the supporting text.

4.9. Limb 1 b) of the policy makes reference to *“improving resilience... to climate change impacts”* but does not define what these impacts are either within the policy or supporting text.

4.10. Limb 2 states that;

“Applications for major development proposals should include an Energy Statement to demonstrate how the net zero greenhouse gas emissions targets will be met”

4.11. No definition of the targets referenced is provided or how applications should demonstrate that they should be met.

- 4.12. The policy is also inconsistent with the requirements set out in CC3 (see below). It is advised that this policy be aligned with the requirements of the forthcoming Future Homes & Buildings Standard which is referenced in the supporting text of policy CC3, as the proposed net zero carbon policy is not justified by the supporting evidence base documents.
- 4.13. Policy also requires major development to calculate carbon emissions;
- “through a nationally recognised Whole Life-Cycle Carbon Assessment, demonstrating actions taken to reduce life-cycle carbon emissions.”*
- 4.14. However, no examples are provided of what would be considered acceptable in terms of a methodology or scale of actions taken to reduce life-cycle carbon.
- 4.15. The supporting text (para 8.10) makes reference to ‘energy reduction targets’ but the actual targets are not quoted or defined.
- 4.16. Para 8.10 also quotes an energy hierarchy, but the measures in the hierarchy are in the wrong order. This should read:
- i. minimise energy demand
 - ii. maximise energy efficiency
 - iii. use low carbon technology (onsite)
 - iv. use renewable energy (onsite), and
 - v. utilise other low and zero carbon energy sources (offsite).
- 4.17. The policy’s supporting text does not provide any additional detail on the above to aid interpretation or ensure effective implementation and it is inconsistent with national policy. The policy is therefore inconsistent with the requirements of NPPF paragraphs 16 (d), and 36 (c) and (d), and as a result could fail a soundness test.



Policy CC3: Reducing Energy Consumption

Table 5 - Policy CC3 Soundness Summary

CC3 – Reducing Energy Consumption		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	No	The current wording does not provide sufficient clarity to applicants on the requirements of the policy.
Consistent with National Policy	No	The current wording relating to on-site carbon emissions reduction is inconsistent with the forthcoming Future Homes Standard.
Amendments Required		
<p>Amend text as follows:</p> <p>1. Major development proposals should produce an Energy Statement to show how they will minimise whole life-cycle emissions in line with a nationally recognised methodology (such as RICS Whole Life Carbon Assessment, Professional Standard, 2nd edition) and maximise on site carbon reductions in accordance with the forthcoming Future Homes & Buildings Standards.</p> <p>2. Development design layout, orientation, building materials and the provision of green and blue infrastructure, including tree planting, should support the use of low carbon energy, increase resource efficiency, prevent buildings overheating and support a reduction of urban heat temperatures should, through layout, orientation, building materials and the provision of green and blue infrastructure, including tree planting, aim to</p> <p>a) support the reduction of building energy consumption,</p> <p>b) increase resource efficiency,</p> <p>c) prevent buildings overheating and</p> <p>d) support a reduction of the urban heat island effect</p> <p>Additional detail will be provided in a dedicated Supplementary Planning Document.</p> <p>3. New buildings and development proposals should minimise the consumption of energy, water and other resources and maximise energy and water efficiency, in accordance with other Local Plan policies (CC1 and EN1).</p>		

4. Energy efficiency improvements and reductions in carbon emissions for existing buildings will be supported and encouraged, in accordance with other Local Plan policies.

5. Development proposals that involve substantial demolition should demonstrate that it is not possible to retain, adapt and re-use the existing building. **The demolition and replacement of the existing building should be justified using a combination of economic, social and environmental factors to set out why a replacement building will offer more benefits than the existing structure.**

6. Natural 'passive' and 'fabric-first' measures should be prioritised to reduce energy use.

7. A network of public and private electric vehicle charging facilities across Central Lancashire will be supported.

4.18. Limb 1 of the policy states that,

"Major development proposals should produce an Energy Statement to show how they will minimise whole life-cycle emissions and maximise on site carbon reductions."

4.19. This is inconsistent with the CC1 requirement to demonstrate how net zero greenhouse gas emissions targets will be met.

4.20. In addition, no detail is given on what would be considered an acceptable level of on site carbon reduction, and it is therefore advised that the policy is aligned with the forthcoming Future Homes & Buildings Standard which will regulate emissions from new development through Building Regulations, in the absence of detailed justification within the Local Plan evidence base documentation.

4.21. The second limb is vague and unenforceable as it cuts across a number of different, albeit related, issues without offering sufficient guidance on enforceable standards to justify development. More detail is required on how design strategies can impact the list of issues provided; low carbon energy, resource efficiency, building overheating and urban heat island effect. It is advised that a supplementary planning document be provided to give applicants more guidance, and the policy be reworded to reflect this.

4.22. The third limb repeats the first (minimise consumption of energy and maximise energy efficiency) and references other Local Plan policies without naming the policy or their related targets (water consumption targets quoted in Policy EN1). Again, policy requires rewording to provide relevant clarity and guidance.

4.23. The fifth limb states that;

"Development proposals that involve substantial demolition should demonstrate that it is not possible to retain, adapt and re-use the existing building."

4.24. However the policy does not state the criteria which should be used for assessment or what thresholds need to be achieved to demonstrate that existing buildings cannot be reused.

4.25. The supporting text (para 8.21) makes reference to zero carbon targets. This is different to a 'net' zero carbon target and is not defined anywhere.



4.26. As above, the policy’s supporting text does not provide any additional detail on the above to aid interpretation or ensure effective implementation and it is inconsistent with national policy. The policy is therefore inconsistent with the requirements of NPPF paragraphs 16 (d), and 36 (c) and (d), and as a result could fail a soundness test.

Policy ST2: Sustainable and Active Travel

Table 61 - Policy ST2 Soundness Summary

Policy ST2: Sustainable and Active Travel		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	Amendments required to ensure compliance with paragraph 58 of the NPPF in relation to the appropriateness of planning obligations. Amendment required in order to ensure compliance with paragraph 116.
Amendments Required		
<p>Amend limb 4 as follows:</p> <p>Where evidence shows that it is required, contributions may will be sought towards projects identified within the Central Lancashire Local Cycling and Walking Infrastructure Plan.</p> <p>Amend limb 5 b) as follows:</p> <p>Any unacceptable detrimental impacts (in terms of capacity and congestion) upon the highway network are mitigated to the satisfaction of the relevant Highway Authority;</p>		



- 4.27. As currently written the policy is too vague as to when contributions will be sought towards cycling and walking infrastructure projects. The amendment proposed clarifies that this is related to it being required and justified by evidence. This change ensures compliance with paragraph 58 of the NPPF and The CIL Regulations (122).
- 4.28. Limb 5, as drafted is currently in conflict with the NPPF (paragraph 116) as it would require mitigation for any level of detrimental impact. Even if this was minor. The proposal amendment means that the policy aligns with the NPPF in this regard.

Policy ID2: Developer Contributions and Planning Obligations

Table 7 - Policy ID2 Soundness Summary

Policy ID2: Developer Contributions and Planning Obligations		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	As drafted it is not clear what actions the decision maker should take if a scheme that is the subject of a planning application is unviable.
Amendments Required		
Amend the policy to add a new limb under limb 4 that state the following: <i>Should a development be shown to be unviable, lesser or no contributions will be required towards the delivery and maintenance of those items listed under limb 2. The level of contribution will be assessed on an individual basis and linked to the extent to which the development is unviable.</i>		

- 4.29. While Policy ID2 is correct in identifying that viability assessments could be undertaken on any proposal and show that it is unviable, it is not clear what this finding would trigger in terms of decision making.
- 4.30. The proposed amendment would add clarity regarding the next course of action in order to ensure that development can still be delivered to meet needs despite viability challenges.

5. Summary and Conclusions

- 5.1. These representations have been produced by Savills on behalf of Tallentine in relation to the Central Lancashire Local Plan 2023-2041 Publication Version (Regulation 19) consultation.
- 5.2. Tallentine's interest centres on Preston West, along with some sites which are omitted from the plan but were proposed to be considered for inclusion for future development. Representations have been submitted in previous consultations that reference the opportunities afforded by these sites.
- 5.3. With regards to the Preston West proposed allocation, Tallentine remains a willing landowner in terms of supporting future development and is keen to be part of the engagement with the Council to ensure the site can come forward and deliver the Council's vision.
- 5.4. Tallentine also wish to work proactively with the other landowners at Preston West to progress the allocation and to assist on demonstrating its deliverability. They would welcome the opportunity to discuss this with the Council at the earliest opportunity.
- 5.5. In general the CLLP is a well-considered plan with a sound spatial strategy and emphasis on ensuring sustainable patterns of development. The allocation of Preston West as a strategic allocation is particularly welcomed.
- 5.6. Tallentine also consider that their additional land holdings are suitable for future development and should be considered in the event that additional development land is required.
- 5.7. However, there are a number of changes required to policies within the CLLP in order to ensure that it is sound, in terms of being justified, effective, and in accordance with national policy. Amendments have been set out that would make the Plan sound in this regard.
- 5.8. Should you have any questions on these representations please contact Jonathan Ainley at Savills

Jonathan Ainley
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