

**CENTRAL LANCASHIRE LOCAL PLAN  
PREFERRED OPTIONS – PART ONE**

Representations by Redrow Homes Ltd

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## 1.0 Introduction

- 1.1 These representations to the Central Lancashire Local Plan Preferred Options Part One Consultation (CLLP) are made by Redrow Homes Ltd (Redrow).
- 1.2 Redrow has interests throughout Central Lancashire and has a track record for successful housing delivery in Chorley, Preston and South Ribble.
- 1.3 The representations address the questions set out in the CLLP and have been divided into relevant topic chapters to provide a comprehensive response to the consultation.
- 1.4 The chapter headings are set out in the Contents table and summarised below for ease:
  - Spatial Vision and Strategic Objectives
  - Delivering Homes in Central Lancashire
  - Proposed Site Allocations
  - Building Sustainable, High Quality Communities
- 1.5 The following evidence base documents are also relevant to the representations:
  - Central Lancashire Housing Study 2022
  - Central Lancashire Housing Study 2020
  - Open Land Designations Study 2022
  - Central Lancashire Density Review
- 1.6 Redrow has a number of land interests in Central Lancashire. These include both proposed site allocations and a number of omission sites. These will be referred to within Chapter 4. Each site is available, suitable and achievable with a realistic prospect that housing could be delivered on the site within five years. Therefore, all the sites can be termed 'deliverable' in accordance with the definition provided at Annex 2 of the National Planning Policy Framework (NPPF).

## 2.0 Spatial Vision and Strategic Objectives

### Vision and Objectives

- 2.1 Redrow support the overarching Central Lancashire Vision and its ambition for high quality development in sustainable locations. Strong and distinctive places are at the heart of Redrow’s own place-making framework (‘The Redrow 8’) and the Company is fully committed to delivering sustainable thriving communities which respect the local characteristics of an area.
- 2.2 We endorse the strategic objectives which flow from this Vision – with particular reference to Strategic Objectives 2, 3, 4 and 8 which relate to high quality development in the right locations and development which will deliver a range of housing to meet local needs. Further detail on the proposed housing Policy Directions is covered in Chapter 3. Strategic Objective 10, which outlines the aspirations for biodiversity net gain, is also aligned with the Company’s sustainability strategy.
- 2.3 Strategic Objective 1 relates to climate change targets and net zero requirements. Redrow have particular concerns with this objective, which seeks to run ahead of national planning policy and building regulation changes – further detail is provided in Chapter 5.

### Spatial Strategy

- 2.4 The Spatial Strategy is largely carried over from the Central Lancashire Core Strategy, in that it continues to focus development on the delivery of key strategic locations across Preston and South Ribble.
- 2.5 A clear settlement hierarchy is outlined, with five settlement tiers according to the settlement’s sustainability and suitability for further growth. The hierarchy is broadly similar to Core Strategy Policy 1, but has been expanded to provide five tiers rather than three. This additional distinction is useful in that it provides further clarity on the anticipated distribution of development across the three Authorities. Redrow agree that allocations should be identified in accordance with the settlement hierarchy to ensure sustainable development is achieved. The hierarchy proposed is a fair and accurate reflection of the sustainability of each location.
- 2.6 However, Redrow are concerned that the proposed site allocations do not, in all circumstances, mirror the level of development anticipated to be attributed to each tier. For example, Tier 5 Smaller Rural Villages and Hamlets have a number of moderately sized allocations in locations such as Charnock Richard, Mawdesley and Wheelton, despite Policy Direction 6 indicating that only low levels of growth and investment would be directed to such settlements. The effect is that fewer allocations have been made in settlements in the higher order settlements. Redrow consider that further allocations should be identified in sustainable locations in Tier 1-3 settlements, to ensure that the growth of each settlement is more in-keeping with its sustainability credentials.

- 2.7 Another key element of the proposed spatial strategy is the potential Salmesbury/Cuerdale Growth Option adjacent to the A59. Redrow have concerns about this proposal due to the significant harm it would cause to the Green Belt and the Brockholes Nature Reserve SSSI. In short, the scale of the proposal is unsuitable for its location. Whilst it is acknowledged that South Ribble may need to find additional land to meet housing requirements should the Pickerings Farm appeal be dismissed, there are alternative sites available adjoining existing settlements. Redrow consider that a more incremental approach to housing distribution across South Ribble would result in a better and more balanced pattern of sustainable growth. Furthermore, as evidenced by Pickerings Farm, strategic sites of this scale can take many years to deliver housing completions due to long lead-in times and delays to the provision of supporting infrastructure. To allocate another strategic site of this scale would not help to bridge the gap between housing needs and housing delivery and would likely result in housing completions being pushed towards the end of the plan period. Alternatively, the allocation of other sites, adjacent to existing settlements, would deliver the required housing numbers in a shorter timeframe, ensuring that housing completions remain at an acceptable level.
- 2.8 Paragraph 143 of the NPPF states that identifying areas of safeguarded land would assist with ensuring that Green Belt boundaries endure and longer-term development needs can be met well beyond the existing plan period. Redrow believe that the identification of safeguarded land in the CLLP is essential to ensure a longer-term reserve of suitable sites to meet future development needs. Such a policy would ensure that should circumstances change, Green Belt boundaries do not need to be reviewed again and further development is directed towards the most suitable locations. The CLLP proposes no additional safeguarded land in South Ribble during the plan period and due to a need to identify further housing allocations (see paras 3.2-3.16 of these representations), and leaving aside the flawed Salmesbury/Cuerdale Growth Option, there would be a lack of flexibility to accommodate future growth. In Chorley, most of the existing safeguarded land has either been identified as a proposed allocation or discounted, leaving no remaining safeguarded land within the borough. Redrow have serious concerns about this approach, which is picked-up in the attached Appendices.
- 2.9 Redrow also have concerns with Policy Direction 8 and 9. These are considered within Chapter 5 of these representations.

### 3.0 Delivering Homes in Central Lancashire

- 3.1 There are a number of points to be addressed in relation to housing delivery in Central Lancashire. These include the housing requirement over the plan period and the distribution of new homes across Central Lancashire, as well as comments in relation to density, type and tenure and affordable housing delivery.

#### Housing Requirements

- 3.2 NPPF paragraph 61 identifies that strategic policies determining the minimum number of homes needed should be informed by a local housing needs assessment (LHN), using the Standard Method, unless exceptional circumstances justify an alternative approach. PPG provides further clarity, indicating that there are circumstances where it may be appropriate to consider whether actual housing need is higher than the Standard Method (NPPG 2a-010-20190220). This acknowledges that there will be occasions when a number of factors will justify a higher housing need figure, for example in areas with significant growth strategies. It is the role of the local plan to ensure that the right number of homes are delivered to meet the community's needs.
- 3.3 The Central Lancashire Housing Study 2022 confirms that the area is a self-contained functional Housing Market Area, which should look to meet its own housing needs over the plan period. The Study identified a minimum LHN figure of 988 dpa for Central Lancashire which comprises figures of 542 dpa for Chorley, 265 dpa for Preston and 181 dpa for South Ribble.
- 3.4 The key part of the Study is the derivation of housing need based on the Standard Method. The preferred housing need option is an Employment-led scenario which generates a requirement of 1,334 dpa across the Authorities. Over the plan period (2023-2038), this will require 20,010 net additional dwellings. Sufficient land above this requirement is also required to provide an adequate buffer for slippage and to ensure that there is some flexibility to provide a continuous supply beyond the plan period.
- 3.5 Whilst the proposed housing requirement is higher than the LHN baseline figure, the Study suggests that the higher requirement is better aligned with past completion trends and forecast levels of employment growth. In that regard, average completions during the Core Strategy plan period total 1,512 dwellings per annum. Redrow agree that the housing requirement should have regard to market signals and trends, but note that the proposed requirement is still significantly lower than historic completion rates. In our view, this would be a backwards step, constraining a housing market where needs are evidently greater than the proposed requirement.
- 3.6 The CLLP is clear about its economic aspirations for the area over the plan period. This is reflected in the Vision, as well as the various supporting strategies including Lancashire 2050 and the Strategic Economic Plan, which are founded on a strengthened and growing economy. In parallel,

the NPPF urges Authorities to significantly boost the supply of housing (paragraph 60).

- 3.7 The NPPF is also clear that planning policies should create the conditions in which businesses can invest and expand to support economic growth and productivity (Paragraph 81). To achieve this objective, planning policies should seek to address potential barriers to investment such as inadequate infrastructure, services or housing (Paragraph 82). This evidences that the two objectives of growing the economy and boosting housing supply are closely intertwined.
- 3.8 The CLLP should show far greater ambition in relation to the delivery of housing to match its ambitions for a stronger and larger economy, as economic growth and housing growth need to be aligned. The housing requirements as currently proposed are not sufficient and will not adequately support economic growth in Central Lancashire.
- 3.9 The other factor which has not been given sufficient consideration to date is the affordable housing requirement for the three Authorities.
- 3.10 The affordability ratio for each authority is as follows:

Preston	South Ribble	Chorley
4.99	6.34	7.04

- 3.11 The above affordability ratios evidence the severity of the affordable housing crisis, most notably in Chorley. In Chorley, those on the lowest incomes seeking to purchase a home at the lower end of the property market need to find almost seven times their annual income to do so. This is substantially higher than Preston (five times average income) and South Ribble (six times average income). Both South Ribble and Chorley have affordability ratios above the North West average (6.11), evidencing that even within the region, two of the three Authorities have significant issues with housing affordability. The affordability ratio also highlights the glaring discrepancy between affordability and the proposed housing requirements, as Chorley has the lowest overall requirement over the plan period, despite having the greatest affordability need.
- 3.12 The affordable housing need across the three Authorities is 805 dwellings per annum. This equates to 60% of the identified housing requirement of 1,334 dwellings per annum. Moreover, the 805 pa figure does not account for losses to the existing affordable housing stock from Right to Buy sales. Therefore, it is questionable how the three Authorities see affordable housing needs being met over the plan period.
- 3.13 Given that the primary delivery mechanism for affordable housing is through S106 obligations, there is an imperative to ensure that general housing requirements are set at a level to make a substantial contribution to meeting affordable housing needs. Should the affordable housing

requirement from the Core Strategy be rolled over into the emerging plan, new housing developments would be expected to deliver 30% affordable housing in the urban parts of Preston South Ribble and Chorley and 35% in rural areas.

- 3.14 To achieve 805 affordable dwellings per annum, the general housing requirement would need to be in the order of 2,700 dpa– over double the proposed housing requirement. Whilst it might not be realistic to meet affordable housing needs in full, the proposed housing requirement lacks ambition and would continue the past trend of affordable housing under-delivery in Central Lancashire.
- 3.15 Given the severe affordable housing need and increasing affordability ratios, action should be taken to increase affordable housing delivery. Without such action, the out migration of the working age population is likely to continue, as they are unable to afford to live in their local area. In Redrow’s view the level of affordable housing need across the three Authorities warrants significant weight in the determination of the overall housing requirement.
- 3.16 When combined with the uplift required to support economic growth across South Ribble and Chorley, there is a clear case for increasing the housing requirement. Redrow suggest the combined housing requirement should be a minimum of 1600 dpa, representing a 20% (approx.) increase on the proposed target. This would better align with past build rates and support greater economic growth and affordable housing delivery.

### Housing Distribution

- 3.17 PPG specifies that for joint plan making it is for the relevant strategic policy-making authority to distribute the housing requirements across the plan area (ID: 2a-013-20201216).
- 3.18 Accordingly, the proposed approach is to re-distribute the housing requirement (1,334dpa) across the three Authorities. The proposed distribution seeks to optimise urban capacity through the use of brownfield sites and locate homes close to jobs to build a strong competitive economy and respond to the nationally significant constraints. However, this results in an uneven distribution over the plan period, with overall requirements still heavily weighted in favour of Preston (37.5%), as opposed to South Ribble (33.7%) and Chorley (28.8%).
- 3.19 Moreover, a phased approach to housing requirements is proposed, with either a step-up or step-down approach over the plan period. The proposed requirements for each authority are set out below.

Authority	Annual Housing Requirement 2023-2027	Annual Housing Requirement 2028-2032	Annual Housing Requirement 2033-2038
Preston	600	500	400
South Ribble	400	450	500
Chorley	334	384	434
Total	1,334	1,334	1,334

Redrow consider that housing requirements should not be artificially constrained in South Ribble and Chorley early in the plan period, as this would prevent South Ribble and Chorley achieving their ambitions for economic growth and further constrain affordable housing delivery.

- 3.20 Aside from the comments previously made in respect of strategic sites in Preston, which have been delayed due to a need for major road infrastructure, there is limited justification to evidence how the requirements have been proportioned over the plan period. For example, there appears to be no evidenced rationale as to why Chorley's housing requirement is lower than recent completions or their LHN. It is also unclear what consideration has been given to affordable housing need or the spatial strategy.
- 3.21 The CLLP highlights a concern across the three Authorities about demographic trends which are leading to an ageing population, most notably in Chorley. The Central Lancashire Housing Study indicates that considerable growth has been seen in the 65+ age group in South Ribble, but most significantly in Chorley. This is also reflected in the old age dependency ratios, which are higher than the national average for both Authorities. This further emphasises the need for housing requirements in these areas to be significantly increased.
- 3.22 As previously noted, Redrow consider a minimum housing requirement of 1600 dpa is required to support economic growth and better address affordable housing requirements. This additional requirement should be distributed to Chorley and South Ribble, as the market is being constrained in those areas and the affordable housing need is greatest.

### Density

- 3.23 The Central Lancashire Housing Density Study informs assumptions about the potential development capacity of sites being considered for allocation. It is a summary of the residential density historically achieved on sites within Central Lancashire.

- 3.24 The report concludes that the following densities are considered a good starting point to apportion gross density calculations:
- Rural Settlements – 27dph
  - Suburban – 27dph
  - Inner urban and town centre – 40dph
  - Preston city centre – 477
  - Other (rural) - 21
- 3.25 Policy Direction 15 in the CLLP indicates that new residential development should achieve the minimum densities for the relevant density typology zone. It is noted that the densities are minimum densities that are expected to be achieved.
- 3.26 Whilst Redrow have no concerns with the inclusion of such a policy, which seeks to optimise use of land, the Company do have concerns with the use of minimum densities on a gross area basis. This is because the nature of development sites varies greatly and the net developable area can therefore be significantly different between sites. Existing constraints including topography, services and ground conditions can lead to significant amounts of non-developable land. Also, increasing planning policy requirements such as open space requirements and biodiversity net gain requirements will result in larger swathes of land being retained and not developed. Measuring on a net developable area basis, to provide a net site density, would be a more realistic measurement tool. The Study and its findings should be reviewed on this basis.
- 3.27 The policy should also reference the fact that different densities may be appropriate in different local areas, depending on the characteristics of the local area. Redrow consider this element of Policy Direction 15 should be amended as follows:

*“New residential development should:*

*Where possible, achieve the minimum net site density for the relevant density typology zone, having regard to the character of the surrounding area”*

#### Type of Housing to be delivered

- 3.28 Policy Direction 15 comments on the requirement for new development to provide a range of house types and sizes, responding to the needs identified in the Housing Need and Demand Assessments. Strategic Objective 4 sets a requirement for a mix of housing types and sizes, including both family and affordable homes, to deliver economic aspirations and meet local housing needs.
- 3.29 The most recent assessment of housing needs in South Ribble was undertaken in 2020. Separate Chorley and Preston Housing Need and Demand Assessments (2022) have also been published. The overall

summary of need by dwelling size and type for market and affordable properties is shown at Table 4 of the CLLP.

- 3.30 Table 4 demonstrates a strong need for 3 and 4 bedroom market houses across Central Lancashire, with a moderate need for 2 bed homes and 2/3 bedroom bungalows. Similarly, there is a significant need for 3 bed homes for affordable homes ownership. 2 and 3 bedroom houses are required for social/affordable rent, as well as 2 bed bungalows.
- 3.31 Redrow note the overall dwelling mix set out in Table 4, but consider that a flexible, less prescriptive approach needs to be applied to the provision of market housing, recognising the important part that aspiration plays in peoples' choices. House builders are best placed to determine the optimum housing mix for any particular site, based on market research and experience. Indeed, the demand for larger homes and more generous external space saw a pronounced increase during the post-covid period, closely aligned with a trend towards working from home. Therefore, house builders need planning policies which allow some flexibility to respond to a dynamic housing market.
- 3.32 Policy Direction 15 should be amended as follows:
- “New residential development should:*
- Contribute to the overall mix of housing in Central Lancashire by providing a range of house types and sizes, responding to both local need and market demand”.*
- 3.33 Policy Direction 15 also includes a requirement for all new dwellings to meet the Nationally Described Space Standards (NDSS). However, the NDSS are intended to be optional and can only be introduced where there is clear evidence of need. Therefore, the three Authorities need to provide robust evidence before introducing a NDSS requirement.

### Affordable Housing

- 3.34 Given the severity of the affordable housing crisis, the delivery of affordable housing across the three Authorities should be given significant weight and the housing requirement increased accordingly, as discussed earlier in this chapter. The other point to note in respect of affordable housing is that unlike Core Strategy Policy 7, the Policy Directions as currently drafted do not include specific affordable housing targets, which should be introduced to provide clarity in decision making across the three Authorities.

## 4.0 Proposed Site Allocations

- 4.1 The CLLP outlines a clear methodology which has been used to inform the site selection of the proposed site allocations. Redrow have concerns with proposed distribution of the site allocations for the following reasons.
- 4.2 The residual supply calculation demonstrated a requirement to identify additional land for allocation in both Chorley and South Ribble, as shown in the table below. Remaining permissions and allocations in Preston already exceeded the supply required under the proposed Policy Direction.

	Chorley	Preston	South Ribble
Proposed Policy Distribution	6,878	8,516	7,606
Net Residual Requirement	-3,687	1593	-2,603

- 4.3 Accordingly, the CLLP proposes allocations to meet the residual requirements. However, Paragraph 5.28 of the CLLP acknowledges that there is a need for a further 660 dwellings in Chorley in order to meet its residual requirement in full, which may not be capable of being accommodated during the plan period. The approach to dealing with this requirement is outlined below (our emphasis added):

“The Councils’ assessment of strategy options has sought to minimise the extent of unmet needs and provide a basis for addressing these unmet needs elsewhere in Central Lancashire as part of the proposed Policy Direction. In the short-term details of remaining identified and allocated sites indicate that the contribution towards supply under the proposed Policy Direction could be greater overall and delivered more quickly in Preston. This is reflected in the starting point for the proposed phasing of the housing requirement by Council area as part of the Policy Direction.”

- 4.4 The proposed approach therefore seeks to meet part of Chorley’s residual need in Preston, on the basis that housing could be delivered more quickly and on a larger scale. Redrow dispute this approach, as there are a number of alternative sites in Chorley which are capable of delivering new homes early in the plan period. Even in the circumstance that it was determined that these homes could not be delivered in Chorley, it must be questioned why the residual requirement is not directed to South Ribble, to help address affordable housing needs there. This will be covered under Omission Sites below.

### Proposed Site Allocations

- 4.5 Redrow support the inclusion of CH/HS1.38 Land at Tincklers Lane,

Eccleston. Outline planning permission was granted for up to 80 units on part of the land in 2022 (ref: 20/01331/OUTMAJ). Redrow have subsequently submitted a Reserved Matters application for the erection of 66 dwellings, including public open space, structural greenspace and surface water attenuation ponds. Redrow Homes is a Plc housebuilder with a track record of successful delivery in Chorley and we believe that there are no significant constraints which would prevent delivery on this site early in the plan period. Although a small part of the allocation site is not controlled by Redrow, that landowner also has an aspiration for development. The site is available, suitable and achievable with a realistic prospect that housing could be delivered on the site within five years and therefore it can be considered 'deliverable' in accordance with the definition provided at Annex 2 of the National Planning Policy Framework (NPPF).

- 4.6 Redrow also support the inclusion of CH/HS1.53 Town Lane, Whittle-le-Woods. Redrow previously submitted an outline application for up to 250 dwellings on part of this site. The application was later appealed on non-determination grounds. The appeal was dismissed on a narrow point which concerned a proposed pedestrian/cycle link at the western end of the site. In that regard, the appeal Inspector concluded that insufficient information was available at that time to determine whether an acceptable scheme could be provided.
- 4.7 Since the non-determination appeal, further technical work on the proposed pedestrian/cycle connection has been undertaken and a highways pre-app meeting held with Lancashire County Council Highways. Redrow subsequently re-submitted an outline application (ref: 22/01142/OUTMAJ) with revised pedestrian/cycle link details, demonstrating that a technical solution to issue was available. The revised application is currently pending determination. This site is also considered to be available, suitable and achievable with a realistic prospect of housing delivery within five years. Further details on the site's suitability are provided in the attached Appendices.
- 4.8 However, Redrow do raise a concern with the number of dwellings attributed to the proposed allocation site. As stated above, the current outline application is for up to 250 dwellings. The boundary of the application site only extends over 73% of the proposed site allocation and a further 12 acres (gross) is available for development (also controlled by Redrow). Redrow consider the notional site capacity should be increased to 330 dwellings.

### Omission Sites

- 4.9 Redrow consider that additional housing can be provided in Chorley in order to meet its housing requirement over the plan period. There are a number of alternative sites capable of accommodating further development, which are available, suitable and achievable. Further details are outlined in the attached Appendices. Should it not be possible to

accommodate the total residual requirement in Chorley during the plan period, the remaining residual requirement should be directed to South Ribble to enhance affordable housing delivery.

- 4.10 The CLLP also questions whether Central Lancashire should look further ahead with a +30-year Vision and whether alternative development options which should be considered beyond the plan period.
- 4.11 Redrow support adopting a longer-term Vision for Central Lancashire to provide greater certainty and ensure that development needs are met in the most sustainable way. It would also reduce the potential for a further review of Green Belt boundaries during the plan period. Longer term development needs have previously been addressed through the mechanism of safeguarded land and Redrow support the identification of additional safeguarded land in all three Authorities.
- 4.12 The CLLP outlines the Salmesbury/Cuerdale growth option as one means of meeting future development needs across the Central Lancashire area. The site assessment profile indicates this could accommodate 1300 dwellings and 91ha of employment development. However, the site has a number of constraints including topology, possible contamination and is within a HSE risk zone for hazardous installations/pipes. It is also within a Biological Heritage Site and in close proximity to a SSSI (Brockholes Nature Reserve).
- 4.13 In terms of the impact on the Green Belt, the Open Land Designations Study includes parts of the site within parcels P12, P14 and P61. The Study identifies each of these parcels to have limited/no contribution to Green Belt purposes 1, 2 and 4, however a significant contribution to Green Belt purpose 3. Redrow dispute those findings as set out in the table below.

Purpose	Open Land Designations Study	Redrow
Purpose 1 – preventing urban sprawl	Limited/no contribution – the M6 prevents urban sprawl of the Central Lancashire built up area.	Significant contribution - The land is isolated and detached from any existing urban area. It has no durable boundaries, so is likely to result in unrestricted urban sprawl.
Purpose 2 – preventing neighbouring towns from merging	Limited/no contribution – land lies in a gap of over 8km between Preston and Blackburn.	Moderate Contribution - There is urbanising development at Salmesbury Aerospace Enterprise Zone and the settlements of

		Mellor Brook and Mellor. Development here would significantly reduce the distance between those areas, further consolidating existing development in the gap.
Purpose 3 – Safeguarding the countryside from encroachment	Significant contribution – parcel has rural uses and contains land with a strong distinction from all urban areas.	Significant contribution – the parcel has a rural character with strong distinction from urban areas. It also lies adjacent to a SSSI – an area which would be highly sensitive to development.
Purpose 4 – preserving the setting and special character of historic towns	Limited/no contribution – parcel does not contain land that contributes to the setting or special character of any historic town	Limited/no contribution
Purpose 5 – Assisting in urban regeneration	Equal contribution – All GB land makes an equal contribution	Equal contribution

- 4.14 Although the parcels are identified to only have 1 significant contribution to the five Green Belt purposes, this is disputed as set out above. There are 19 other parcels within the Study with only 1 significant contribution and proposed site allocations have only been identified within 4 of these parcels. It must therefore be questioned why this particular site has been chosen, given its significant contribution to Green Belt purposes.
- 4.15 The other key factor is the scale of the proposed development. Sites of this strategic scale will have very long lead-in times and are likely to require significant supporting infrastructure. Little or no consideration appears to have been given to alternative site allocations, including more incremental Green Belt releases on the edge of existing urban areas. Such allocations could take advantage of existing infrastructure and the ability to round-off existing settlements. There are a number of omission sites which would be

more suitable for release from the Green Belt and further details are included in the attached Appendices.

## 5.0 Building Sustainable, High Quality Communities

- 5.1 Policy Directions 20 to 32 cover a range of topics including development policies for healthy and inclusive communities, high quality environments and sustainable energy. When taken together, the purpose of these Directions is to create sustainable high quality communities. Whilst Redrow support the fundamental aims of these policies, the Company have a number of concerns with certain aspects of the Directions as set out below.
- 5.2 Policy Direction 30 requires all major development proposals to seek to integrate low carbon energy and decentralised energy networks and to incorporate water efficiency measures to mitigate impacts of drought. Policy Direction 8 refers to climate change and sets the objective of being net zero by 2030. From 2030, all new development must be net zero and if this cannot be achieved on site, the shortfall should be provided through a cash contribution to a carbon offset fund or off-site. The Policy Direction goes on to state that planning applications must be accompanied by an Energy Statement demonstrating how carbon emission savings have been maximised and Building Regulation requirements exceeded.
- 5.3 Whilst Redrow are committed to reducing carbon emissions from our homes, Policy Direction 8 is seeking to introduce requirements which go above and beyond the Government's approach of ratcheting-up Building Regulations to achieve zero carbon ready homes by 2025. The further achievement of net zero will be dependent upon the decarbonisation of the electricity grid and the Government's ambition is to achieve that by 2050 (not 2030). The new Future Homes Standard (FHS) will ensure all new homes built from 2025 onwards will produce 75-80% less carbon emissions than homes delivered under current Building Regulations. The FHS has not yet come into effect, but the house building industry and its suppliers are already working towards this target. It would therefore be unhelpful and premature to set an objective of being net zero by 2030, because the Government's strategy for achieving net zero relies on increasing standardisation and economies of scale for product manufacturers, as well as decarbonisation of the national grid.
- 5.4 In view of the above, there is no justification for setting higher standards than Building Regulations permit. As such, the first part and last part of Policy Direction 8, referring to net zero by 2030, should be deleted. Similarly, new standards for water efficiency will be brought in via the Environment Bill. Any requirement to incorporate water efficiency measures should be in-line with current Building Regulations.
- 5.5 Policy Direction 9 refers to development utilising modern methods of construction (MMC) and building materials with a low level of embodied carbon. However, there is currently no national planning policy imperative to use MMC and crucially the supply networks for MMC do not have sufficient capacity to supply the housebuilding industry whilst maintaining an adequate supply of housing. Moreover, detailed information on embodied carbon is not currently comprehensive, which reduces the

effectiveness of such a requirement. Redrow consider that these matters ought to be addressed at a national level through Building Regulations and references to MMC and using materials with a low level of embodied carbon should be removed from Policy Direction 9.

## 6.0 Conclusion

- 6.1 This representation sets out the concerns that Redrow has with elements of the CLLP.

### Spatial Strategy

- 6.2 Redrow support the proposed settlement hierarchy, however we do have concern that some of the proposed site allocations do not closely align with it. Rather, it is Redrow's view that further allocations should be made in the higher order settlements to ensure that the housing allocations are more representative of the hierarchy and that only the most sustainable sites are brought forward for housing development.
- 6.3 The designation of safeguarded land would be welcomed, as part of a longer-term vision for meeting development needs. Safeguarded land should be identified in all three Authorities to provide a clear direction for future growth and provide greater flexibility (if required). In respect of longer-term development options, Redrow consider that the Salmesbury/Cuerdale growth option is inappropriate and would only allow for safeguarded land to be designated within one of the Authorities. Redrow consider that there are other parcels of Green Belt land, which make a similar or lesser contribution to Green Belt purposes, are more sustainable, and could be released for development or designated as safeguarded land to meet future development needs. A more incremental growth strategy, focused on releasing sites adjoining higher order settlements would be a more justified and appropriate strategy to meet longer-term needs.

### Housing Requirement

- 6.4 Redrow consider that the proposed housing requirement is not sufficient to meet development needs across Central Lancashire. It will constrain economic growth in Chorley and South Ribble and will not make adequate provision for affordable housing need. The overall housing requirement should be increased to a minimum of 1600 dpa to better reflect the existing build rate and affordable housing need.

### Housing Distribution

- 6.5 Redrow have fundamental concerns with the proposed housing distribution which remains too heavily focused on Preston. The unbalanced distribution will lead to Chorley and South Ribble being economically disadvantaged and affordable housing needs being unmet. These are also areas where there are significant concerns due to an ageing population. In order to prevent economic decline and help to meet affordable housing needs, additional housing growth should be distributed to Chorley and South Ribble.

### Density

- 6.6 Redrow also have concerns about the proposed minimum densities. The

methodology used in the Density Study is flawed due to its calculation of residential densities on a gross hectare basis. Minimum densities should instead be set on a net developable area basis, to ensure that they are realistic and achievable. Exceptions may also be required to ensure development is appropriate and reflects the character of the surrounding area.

### Proposed Site Allocations

- 6.7 Redrow support the identification of Land at Tincklers Lane, Ecclestone and Land at Town Lane, Whittle-le-Woods as proposed site allocations. In respect of Tincklers Lane, Redrow secured outline planning permission on the site in 2022 and a reserved matters application is currently pending determination. The site is capable of delivering housing completions early in the plan period. In respect of the land at Town Lane, an outline application has also been submitted and we do not believe there are any constraints preventing early development on the site. However, Redrow do have a concern that the proposed notional capacity underestimates the likely yield from the site. A capacity of 330 dwellings is considered to be more reflective of the site's potential.
- 6.8 Redrow are promoting a number of alternative sites for development within this representation. Further details are provided within the attached Appendices. As indicated above, the housing requirement in the CLLP should be significantly increased in order to support economic growth and better address affordable housing needs. The omission sites in the attached Appendices should therefore be allocated for development.

### Low Carbon, MMC and Water Efficiency Measures

- 6.9 Any proposed Policy Directions for embodied low carbon materials, targets for net zero and water efficiency measures should be in aligned with Building Regulations at the time. A full technical review of the FHS is planned in 2023 and will inform future changes to Building Regulations. Any local policy which seeks to pre-empt or exceed changes to the building regulation regime risks jeopardising the Government's approach to achieving net zero carbon homes, because it relies on standardisation and economies of scale for product manufacturers.