

Central Lancashire Local Plan Publication Version Soundness Representations

Harworth Estates Investments Ltd

14 April 2025

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1.0 Introduction

- 1.1 Lichfields is appointed by Harworth Estates Investments Ltd [Harworth] to prepare representations relating to the emerging Central Lancashire Local Plan [CLLP].
- 1.2 These representations have been prepared on behalf of Harworth and represent Lichfields' professional and independent work. The CLLP and its associated evidence base was published on 24 February 2025. A consultation period on the CLLP will run to 14 April 2025.
- 1.3 Harworth welcomes the advancement of the CLLP, and the efforts made by the three Councils in producing the evidence base that supports the document. It is imperative that the three Central Lancashire authorities adopt a Development Plan which accords with national policy as quickly as possible, to ensure that the correct level of housing and economic growth is provided to meet future needs.
- 1.4 These representations have been drafted in the context of Harworth's committed land interest with the draft Preston West strategic allocation (draft Local Plan Policy SS5). Harworth controls a large proportion of land across the site and is committed to progressing a high-quality, sustainable, attractive and accessible development, complementing the existing employment and residential development in Preston.
- 1.5 Harworth is supportive of the draft Preston West allocation (Policy SS5) and considers that the site represents an excellent opportunity to deliver a sustainable, high-quality and attractive residential-led development. However, Harworth also considers that there are a number of potential areas for modification regarding the overall principles for the use and quantum of development on the site, as well as the wording and requirements of the site-specific policy and other policies contained within the plan.
- 1.6 Harworth supports the allocation of the Preston West site and would like to work closely in collaboration with the Council to ensure that a robust allocation based on sound and proportionate evidence can be facilitated, to set the basis for the comprehensive delivery of the site.
- 1.7 The CLLP has reached Regulation 19 Publication stage. It is Central Lancashire's intention that this version of the CLLP will be submitted to the Secretary of State [SoS] for formal examination by the Planning Inspectorate. These representations will focus on assessing each relevant policy against the test of soundness set out in national policy. The representations will also focus on the draft policies contained within the CLLP and assess the relevant elements of the evidence base which seek to underpin the soundness of each policy.

Harworth Group

- 1.8 Harworth Group plc is one of the leading land and property regeneration companies in the UK, owning and managing approximately 15,000 acres across around 100 sites in the North of England and Midlands.
- 1.9 As a master developer, Harworth creates new and sustainable communities by acquiring and assembling large, complex and often former industrial, sites and transforming them into sustainable residential and industrial & logistics developments.

Preston West

- 1.10 The site is located to the west of the Preston urban area adjacent to the recently completed Preston Western Distributor Road. The site is currently identified as open countryside in the adopted Preston Local Plan (2012-2026) but is proposed to be removed within the CLLP and included within the settlement boundary of Preston.
- 1.11 The site is situated in a highly sustainable location, with good access to the strategic road network and opportunities to provide extensive public transport and active travel opportunities, particularly with the proposed delivery of the Cottam Parkway Train Station which represents a significant and fundamental infrastructure commitment for the area.
- 1.12 Harworth strongly supports this allocation and considers that the site presents an opportunity to deliver a high-quality development in one of the most sustainable locations in Central Lancashire which will benefit from, and provide, a range of facilities, services, open spaces, and jobs, and facilitate extensive use of active travel and public transport.
- 1.13 Harworth's vision for the Site comprises a sustainable, attractive and accessible development, delivering a residential-led scheme which complements the existing residential and employment development in the area. The site presents an opportunity to deliver a landscape-led development which provides areas of open space to increase accessibility for the local community. The development will also attract significant investment into the area which will contribute to infrastructure improvements and the general health and well-being of the local population. Development of the Site will meet the Government's overarching objective to significantly boost the supply of housing and achieve sustainable development by providing significant economic, social and environmental benefits. The allocation of the site will facilitate the long term success of the area and secure economic growth in Preston and Central Lancashire more widely.

Test of Soundness

- 1.14 There is a statutory requirement for every Development Plan Document [DPD] to be submitted for independent examination to assess if it is 'sound' and whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). In accordance with s.19 of the 2004 Act, Local Planning Authorities [LPAs] must have regard to several matters including national policies and guidance issued by the SoS, including the National Planning Policy Framework [the NPPF].
- 1.15 The most recently published version of the NPPF (December 2024) sets out transitional arrangements for the purposes of plan-making in Annex 1 (Implementation). Para. 234 sets out that for the purpose of preparing local plans, the policies in the December 2024 version of the Framework will apply from 12th March 2025, other than where one or more of the five criteria set out in the policy apply. Criteria *a* relates to where a plan has reached Regulation 19 (pre-submission stage) on or before 12th March 2025, and its draft housing requirement meets at least 80% of local housing need.
- 1.16 The CLLP Publication Version (Regulation 19) was published for consultation on 24th February and the housing requirement set out in the plan meets at least 80% of local housing need. Criteria *a* therefore applies, and it is our view the draft CLLP should therefore be examined against the December 2023 NPPF. These representations have

therefore been prepared in accordance with the December 2023 NPPF as required by the transitional arrangements set out at para. 234a, and all paragraph references to the NPPF from this point onwards relate to the 2023 version, unless explicitly stated.

1.17 There is no statutory definition of soundness. However, NPPF para. 35 does state that to be sound a Local Plan should be:

- a **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.18 Paragraph 11 of the NPPF states that:

Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- a) *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Structure

1.19 These representations are structured to address the following policies:

- Policy SS1: Development Patterns
- Policy SS2: Settlement Hierarchy
- Policy SS5: Strategic Site Allocation – Preston West

- Policy HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements
- Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments
- Policy HS6: Housing Mix and Density
- Policy HS7: Affordable Housing
- Policy EN1: Well Designed Places
- Policy EN2: Design Criteria for New Development
- Policy ID1: Infrastructure Planning Principles
- Policy ID2: Planning Obligations
- Policy ST2: Sustainable Travel
- Policy EN4: Amenity
- Policy EN7: Designated Sites for Nature Conservation
- Policy EN10: Flood Risk

2.0 **Policy SS1: Development Patterns**

Introduction

2.1 Policy SS1 (Development Patterns) requires new housing, employment and commercial growth to be focused on the most sustainable locations. Policy SS1 states that new housing, employment and commercial growth and associated infrastructure will be focused on the most sustainable locations in Central Lancashire.

2.2 Policy SS1 also states that new development will be focused within settlement boundaries and on allocated sites as shown on the Policies Map.

Consideration of Policy

2.3 Policy SS1 directs development in Central Lancashire to within settlement boundaries (through the development of windfall sites) and on allocated sites. Harworth strongly supports the allocation of sites within the CLLP, particularly the allocation of the strategic site at Preston West (Policy SS5) as it will help to deliver much needed residential and employment land to meet the needs of Preston and Central Lancashire.

2.4 The NPPF (para. 20) states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development. Para. 23 states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.

2.5 The evidence base supporting the CLLP, including the Strategic Housing and Economic Land Availability Assessment 2025 [SHELAA], is clear that there is insufficient brownfield land within the urban area to meet the identified housing and employment needs of the Central Lancashire Boroughs over the upcoming plan period (2023-2041) (as set out in draft Policy HS1). The allocation of sustainable, strategic sites within the CLLP is therefore vital to ensuring that objectively assessed housing and employment needs can be met and brownfield land and windfall development is not solely relied upon.

2.6 Policy SS5 identifies the Preston West site as having the ability to deliver approximately 1,850 homes (450 homes until 2041 with up to 1,400 additional homes to be delivered beyond the plan period subject to masterplanning) and up to 63.3 ha for employment use. The allocation of Preston West in the CLLP will therefore form a vital contribution towards meeting the identified needs of Central Lancashire and Preston through the delivery of a highly sustainable, well connected site adjacent to a Tier 1 settlement. Harworth supports this allocation and considers that the site presents an opportunity to deliver a high-quality development in one of the most sustainable locations in Central Lancashire which will benefit from, and provide, a range of facilities, services, open spaces, and jobs, and facilitate extensive use of active travel and public transport.

Tests of Soundness

- 2.7 Harworth supports Policy SS1 and considers that the policy is sound as currently drafted.

Recommended Changes

- 2.8 Harworth has no recommended changes to Policy SS1.

3.0 **Policy SS2: Settlement Hierarchy**

Introduction

- 3.1 Policy SS2 sets out the proposed settlement hierarchy across Central Lancashire. The Preston Urban Area is identified as a Tier 1 settlement and as such will be the primary focus for development growth and investment, the largest amount of new development will be directed here. This will be delivered through a combination of redevelopment and regeneration activity and major new development to meet strategic general housing, employment, and commercial development needs.

Consideration of Policy

- 3.2 CLLP Policy SS2 seeks to direct the largest amount of new development to the Preston Urban Area, delivered through a combination of redevelopment and regeneration activity, and major new development to meet strategic needs.
- 3.3 Harworth supports the identification of Preston as a Tier 1 settlement in the CLLP settlement hierarchy and considers that the city should be the primary focus for development growth and investment due to its existing infrastructure, networks, and connections and the benefits provided through closer links between homes, jobs, and services. Preston is the largest settlement within Central Lancashire and benefits from extensive transport links and access to extensive provision of health, education, leisure and cultural services and facilities. The majority of new development in Preston identified in the CLLP is within allocated sites, and this is considered to be the correct approach to identifying new land for development. The allocation of the strategic site at Preston West (Policy SS5) will align with this approach and ensure a highly sustainable site can be brought forward that would make a significant contribution to the housing and employment needs of Preston and Central Lancashire.
- 3.4 It is our view, the Central Lancashire authorities should not be overly reliant on the delivery of development on brownfield land through regeneration schemes, including in Preston. As a result of viability pressures, regeneration schemes are often not able to deliver policy compliant levels of affordable housing or the right mix of housing to meet identified needs. Relying on regeneration schemes and brownfield development may result in insufficient market and affordable housing being brought forward across the plan period. The development of some greenfield allocations is more likely to be viable, deliver affordable housing and a varied mix of housing types and tenures. The current approach as set out in this Plan to meeting needs through the allocation of large scale strategic sites is justified and appropriate and will ensure the requisite levels of housing and employment growth can be delivered. It also accords with para. 74 of the NPPF (2023) which recognises that the supply of a large number of new homes can often be best achieved through planning for large scale development such as new settlements or significant extensions to existing villages and towns.

Tests of Soundness

- 3.5 Harworth supports Policy SS1 and considers that the policy is sound as currently drafted.

Recommended Changes

3.6 Harworth has no recommended changes to Policy SS2.

4.0 **Policy SS5: Strategic Site Allocation – Preston West**

Introduction

- 4.1 Policy SS5 allocates the land at Preston West as a strategic location for a residential led mixed-use development comprising the erection of approximately 450 homes until 2041 with up to 1,400 additional homes (to include provision for older people) to be delivered beyond the plan period subject to masterplanning, and up to 63.3 ha for employment use class types B2, B8 and E(g), together with the infrastructure to facilitate the creation of a sustainable community.
- 4.2 Harworth’s land interest at this site is significant and relates to both the residential and employment elements of the policy and comments made in this representation should be considered in this context.

Consideration of Policy

- 4.3 Harworth strongly supports the allocation of the land at Preston West, which will help to deliver much needed residential and employment land to meet the needs of Preston and the Central Lancashire boroughs. Harworth welcomes the Council’s acknowledgment that the site is suitable, available and achievable as stated in the Strategic Housing and Economic Land Availability Assessment [SHELAA] (January 2025) (Appendix 6) which forms part of the Council’s evidence base. The delivery of this site will support the housing and employment needs of Preston and Central Lancashire and Harworth consider that the site will come forward early in the Plan period, potentially earlier than envisaged by the Council, to assist in boosting the supply of development land in Preston.
- 4.4 We address a number of aspects of Policy SS5 in this section, including the split of proposed uses on the site, phasing considerations and the key requirements set out in para. 4 (a-k).
- 4.5 The policy also includes a number of ‘Key Development Considerations’ which refer to other specific policies contained within the draft CLLP. These policies are addressed separately in these representations, with reference back to the requirements of Policy SS5 where necessary.

Amount and Type of Development

- 4.6 Para. 1) of Policy SS5 sets out that land is identified on the Policies Map at the Preston West Strategic Location for a residential-led mixed-use development comprising the erection of approximately 450 homes until 2041 with up to 1,400 additional homes (to include provision for older people) to be delivered beyond the plan period subject to masterplanning, and up to 63.3 ha for employment use class types B2, B8 and E(g), together with the infrastructure to facilitate the creation of a sustainable community.
- 4.7 Harworth supports the principle of a mixed-use development comprising both residential and employment development and considers that the site represents an excellent opportunity to deliver a mix of uses to meet the needs of Central Lancashire authorities. The site is located adjacent to the Preston urban area and existing residential development to the east and benefits from a range of sustainability benefits for new residents, including

proximity to existing services, facilities, employment opportunities and public transport connections. It will also be able to benefit significantly by proximity to the proposed Cottam Parkway Railway Station, which was granted planning permission in September 2023 (LPA ref. LCC/2022/0049).

- 4.8 The Station will provide extensive travel opportunities for new residents in the area, including the delivery of journey times of around 5 minutes to Preston and around 20 minutes to Blackpool. The site also benefits from good proximity to the strategic highway network, in particular the newly constructed Preston Western Distributor Road. This provides connections to surrounding areas for potential new and existing residents, and also for new employment development seeking to benefit from easy access to the strategic highway network.

In terms of the overall capacity of the site and the proposed split of uses set out in Policy SS5, the policy identifies capacity for 1,850 new dwellings, and up to 63.3 ha for employment uses within this area, which is effectively an equal split based on the developable area of the site. Harworth considers that the site is likely to be more suitable for residential development given its existing context, and that there is scope to increase the residential and reduce the commercial element of the policy.

- 4.9 Harworth considers that the proposed split is not entirely reflective of the context of the site, and it should be weighted more towards housing given its proximity to existing residential development within the Preston urban area and the potential benefits which could be provided through clustering new housing around the proposed new Cottam Parkway Railway Station. In addition, the evidence base does not provide clear commercial rationale for proposing a 50/50 split, in terms of the site's attractiveness for particular employment uses and whether there are any market-based demand factors driving this.

- 4.10 This view is supported by the site analysis set out in the Central Lancashire Employment Land Study – Land Supply and OAN Update 2024. The site (ref. 19P031) was considered for its suitability from a market perspective and the following comments were made in relation to its deliverability:

- 1 Given the scale and location of this site, it is assumed any scheme put forward would be housing led.
- 2 It is also unclear if a full half of the site would realistically be brought forward for commercial uses in this mostly residential location, or be held for other options, such as open space.
- 3 The site enjoys a relatively prominent position on the new Western Distributor Road which an access point at the Avice Pimblett Way junction. However, developers and logistics businesses would likely prefer a location closer to the M55 Junction and more distant from housing development.
- 4 Key for deliverability would be to agree the position of the employment site in relation to housing, and its accessibility to Edith Rigby Way and the M55. A clear plan would also need to be agreed between the landowners and developers as to how, and under whose responsibility, it would be to progress the employment element of the project.

- 4.11 The analysis effectively concludes that the site does have suitability for some employment development, but this should not be substantial as the site is more suited to residential

development and developers and logistics businesses may prefer alternative locations which would be more market facing. Harworth agrees with this analysis and considers that the land requirement for the employment element of the policy should be reduced to reflect these considerations.

4.12 A significant proportion of the southern parcel of land on the site also comprises land outside of the control of Harworth that incorporates the existing Ashton and Lea Golf Club which we understand to be subject to a long term lease, and it is not currently certain when this land will become available for development.

4.13 To summarise, Harworth considers the location is better placed to deliver a residential led, mixed-use development and justification has been provided through the evidence base supporting the CLLP to support a reduced quantum of employment development.

Phasing Considerations

4.14 Para. 3) of Policy SS5 sets out that the site is split into two development phases, Phase A North of the Railway and Phase B south of the Railway. Land in Phase A is safeguarded to enable delivery of Cottam Parkway Train Station.

4.15 Harworth considers that the proposed phasing of the site into two distinct phases is appropriate and reflects the context of the site. There is likely to be multiple opportunities to deliver appropriate access points into potential development parcels within Phase A to facilitate development. Furthermore, the Cottam Link Road and the Cottam Parkway Train Station will be delivered within Phase A, and this important new infrastructure will provide a clear basis for delivering and clustering initial areas of new development around this location.

4.16 However, we don't currently believe there is an access point into Phase B (land south of the railway) capable of accommodating the proposed development. Further work on highways access is being commissioned but currently we envisage a new access point would need to be facilitated following the delivery of Phase A by providing a link across the two parcels, in the form of a bridge over the existing railway line or a new junction off Edith Rigby Way. Whilst Harworth supports this logical phase of development, it is expected that additional funding will be required to support and facilitate this important piece of infrastructure. This should be addressed at the plan making stage to ensure the phase B element of the site is deliverable.

4.17 A significant proportion of Phase B also comprises the existing Ashton and Lea Golf Club which is subject to a long term lease and there is some uncertainty regarding the timescales for this land to become available for development. However, the existence of this lease is not seen as a major obstacle to the long-term delivery of this site given the ability to phase future delivery from north to south and the assumption that the majority of the site will be delivered beyond the current plan period.

Key Development Considerations

4.18 Para. 4) of Policy SS5 also states that development meeting the key development considerations (criteria a-k) will be supported. Harworth has no issue in principle with the inclusion of site-specific development considerations, provided they are consistent with national policy, proportionate and reasonable as part of the draft allocation and do not

introduce requirements which would adversely impact the viability of any future development proposals.

- 4.19 Harworth considers that the following development considerations may need to be considered further.

f) Provide a range of new retail and community facilities, involving a new district and/or local centre with a medium or large supermarket, and also smaller scale local or neighbourhood centres to serve day-to-day needs.

- 4.20 Harworth supports the intentions to provide for new community facilities as part of the delivery of the overall allocation, to ensure the needs of new residents can be met. However, any requirement for a proposed district or local centre must be flexible to account for local needs and requirements, and should not be overly prescriptive in terms of what is required as part of the policy, for example requiring a medium or large supermarket. The location and scale of the local centre can be addressed in the masterplanning exercise for the site.

g) Provide on-site and off-site highway improvements and sustainable transport improvements, including delivery of Cottam Parkway Train Station, new access points to enable development of Phase B south of the railway and onto surrounding routes including Lea Road and Edith Rigby Way, and the provision of on-site footways and cycleways linking to the Guild Wheel cycle route, UCLAN campus and wider developments in Cottam and Bartle.

- 4.21 Harworth supports the intention of the policy to deliver sustainable transport improvements which are required to ensure the delivery of the overall allocation, provided any requirements for potential future planning applications meet the key planning obligation tests set out in NPPF para. 57 and the PPG¹.

- 4.22 Harworth also considers that the current wording of this requirement implies that the developer should deliver the Cottam Parkway Train Station. The wording should therefore be removed or amended to ensure it is clear that this piece of infrastructure will not be required to be delivered by the developer, and will be supported by an alternative funding mechanism.

h) Provide land to deliver a new primary and secondary school.

- 4.23 Harworth considers that this criteria as it is currently drafted does not provide a requisite level of flexibility and does not take into account whether a primary or secondary school is actually required at the site. There is no point in sterilising land for an indefinite period of time for a school that is not required at the site. The decision on whether either/both schools are required needs to be a decision based on evidence and capacity of existing schools rather than a blanket requirement on the site.

- 4.24 An element of flexibility should be incorporated into the policy criteria to ensure the developer only provides education provision which is proportionate and necessary to provide for the demand generated by the development. Engagement with LCC Education at the masterplanning stage will be important but additional flexibility in the policy is

¹ Paragraph: 002 Reference ID: 23b-002-20190901

required as there are a number of new and existing schools already in close proximity to the site.

i) Provide a range of house types and tenures, including older person’s and self-build and custom-build dwellings.

4.25 Harworth agrees that any proposed development on the site should provide for a range of house types and tenures to ensure that an appropriate housing mix is delivered on the site which reflects local needs. However, any requirement for certain types of dwellings, including older person’s and self-build and custom-build dwellings, must be based on clear evidence of demand for that particular type of dwelling and must not introduce unjustified requirements which may adversely impact on viability.

Tests of Soundness

4.26 Whilst Harworth strongly supports Policy SS5, it is concerned that it would not meet the tests of soundness for the following reasons:

- 1 **It is not justified:** the expected proportion of land allocated for residential should be increased with a commensurate reduction in the employment requirement to reflect the site specific analysis set out within Central Lancashire Employment Land Study – Land Supply and OAN Update 2024. The site is more suitable for a residential-led development and the employment element of the allocation should be reduced to ensure a market facing allocation is delivered.

A number of key development criteria listed in the policy are also not considered to be fully justified and additional flexibility should be included in the proposed wording. Requirements in relation to community needs, education provision and older person’s and self-build and custom-build dwellings must be adequately justified by up-to-date and proportionate evidence and sufficient flexibility must be incorporated into the criteria to ensure there are no adverse viability impacts at the planning application stage by allowing proposals to respond to requirements and demands in future.

- 2 **It is not effective:** a number of key development criteria listed in the policy are not effective.

Criteria f) – any requirement for a proposed district or local centre must be flexible to account for local needs and requirements and should not be overly prescriptive in terms of what is required as part of the policy, for example requiring a medium or large supermarket.

Criteria g) - wording should be removed or amended to ensure it is clear that the Cottam Parkway Train Station will not be required to be delivered by the developer. The train station already has permission and can be delivered without this allocation contributing financially.

Criteria h) - An element of flexibility should be incorporated into the policy criteria to ensure the developer only provides education provision which is proportionate and necessary to provide for the demand generated by the development and a significant element of the site is not unnecessarily sterilised for a long period of time.

Recommended Changes

- 4.27 Harworth considers that the overall split of development uses proposed as part of the draft allocation should be considered further. Harworth considers that the split of uses should be weighted more towards housing given the characteristics and location of the site and its context, in particular proximity to existing residential development within the Preston urban area and the potential benefits which could be provided through clustering new housing around the proposed new Cottam Parkway Railway Station. The proposed type and quantum of development needs to be proportionate, reflective of the constraints on site and must ensure a market facing allocation which responds to the site context and commercial considerations.
- 4.28 An overall development framework could be prepared at the local plan stage to facilitate a more defined split of uses in terms of use and quantum, which is more representative of the site constraints, the overall developable area and the commercial realities of the proposed allocation.
- 4.29 In terms of the individual development criteria noted above, Harworth would recommend the following changes:

Criteria f) - *Provide a range of appropriate new retail and community facilities, involving a new district and/or local centre **based on local requirements** ~~with a medium or large supermarket~~, and also smaller scale local or neighbourhood centres **if required** to serve day-to-day needs.*

Criteria g) - *Provide on-site and off-site highway improvements and sustainable transport improvements **to meet identified needs generated by the proposed development**, including ~~delivery of Cottam Parkway Train Station~~, new access points to enable development of Phase B south of the railway and onto surrounding routes including Lea Road and Edith Rigby Way, and the provision of on-site footways and cycleways linking to the Guild Wheel cycle route, UCLAN campus and wider developments in Cottam and Bartle.*

Criteria h) – ***Where appropriate, set aside land for a period of time to 2041 to deliver a new primary and/or secondary school, and/or make financial contributions for offsite additional primary and/or secondary school provision if it can be demonstrated that additional school places are required to meet needs generated by the development.***

Criteria i) *Provide a range of house types and tenures, including older person's and self-build and custom-build dwellings **if it can be demonstrated that there is an identified need for this type of development.***

5.0 **Policy HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements**

Introduction

5.1 Policy HS1 (Strategic Policy) sets out the housing requirement for Central Lancashire over the plan period 2023-2041 and states how new homes and infrastructure will be delivered. It also provides an indication of the intended distribution of development across the three Council areas. In short, the Policy identifies a housing requirement for Central Lancashire of 23,652 homes over 18 years, at an annual average of 1,314 homes.

5.2 It is distributed across the three council areas as follows:

- Chorley Council area: 6,012 homes / 334 dwellings per annum [dpa];
- Preston City Council area: 9,360 homes / 520 dpa; and
- South Ribble Borough Council area: 8,280 homes / 460 dpa.

Consideration of Policy

5.3 Harworth supports Policy HS1 in principle including the overall housing requirement figure and the proposed distribution of development for Preston of 520 dpa over the plan period. Central Lancashire is a self-contained functional Housing Market Area (HMA) and is seeking to solely meet its housing requirement in full over the plan period through Policy HS1. Harworth supports this approach and considers that this is justified, appropriate and is consistent with national policy, which states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, and the overall aim should be to meet as much of an area's identified housing need as possible (NPPF 2023 - para. 60).

5.4 As set out in the response to Policy SS1 and SS2, Harworth agrees that Preston should be identified as a Tier 1 settlement in the CLLP and the primary focus for development growth and investment due to its city status, existing infrastructure, networks, and connections and the benefits provided through closer links between homes, jobs, and services. Preston is the largest settlement within Central Lancashire and benefits from extensive transport links and access to extensive provision of health, education, leisure and cultural services and facilities.

5.5 Apportioning the largest distribution of housing growth to Preston through Policy HS1 is therefore considered to be an appropriate approach and is supported by Harworth. The allocation of the strategic site at Preston West (Policy SS5) will align with this approach and ensure a highly sustainable site can be brought forward that would make a significant contribution to the housing needs of Preston and Central Lancashire, as set out in Policy HS1.

Tests of Soundness

- 5.6 Harworth supports Policy HS1 in terms of the number of units directed to Preston and considers that the policy is sound as currently drafted.

Recommended Changes

- 5.7 Harworth has no recommended changes to Policy HS1.

6.0 **Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments**

Introduction

- 6.1 Policy HS5 requires all major new residential development to make provision for open space and a contribution towards playing pitches where required.
- 6.2 Policy SS5 refers back to Policy HS5 and states that development of the site will be expected to accord with Policy HS5, providing an appropriate level of open space to meet the recreational needs of the development.

Consideration of Policy

- 6.3 Policy HS5 sets out that major new residential developments must make provision for open space through on site provision or where appropriate, through financial contributions towards off-site provision or improving the quality, quantity and/or accessibility of existing spaces. Provision must be made in accordance with the standards set out in the policy, using the methodology set out within para 4.27².
- 6.4 Harworth has reviewed the typology standards for Preston set out in Policy HS5, the supporting methodology for calculating open space provision and the Central Lancashire Open Space Study which provides an up-to-date assessment of need and provides information on the quantity, quality, and accessibility of open spaces across Central Lancashire. Harworth has no significant concerns with the approach set out in the policy and supporting methodology, provided the requirements of the policy do not adversely impact the viability position of the site.
- 6.5 Part 1 of Policy HS5 states that financial contributions towards off-site provision will be considered where appropriate. However, there appears to be no consideration set out in the Central Lancashire Local Plan Main Viability Report (February 2025) of whether off-site financial contributions have been factored into viability considerations.
- 6.6 The 2023 NPPF (para. 58) is clear that all viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning practice guidance [PPG]. The PPG sets out that the role for viability assessment is primarily at the plan making stage, and drafting of plan policies should be iterative and informed by engagement with developers and landowners³.
- 6.7 In accordance with national policy and guidance, an updated viability appraisal should include for open space requirements.
- 6.8 The policy also sets out that all major new residential developments must make provision for playing pitches through a financial contribution towards improving existing pitches or the provision of new pitches and ancillary facilities. The financial contribution will be calculated using Sport England's Playing Pitch Calculator. Again, there appears to be no

² The policy should reference para.4.28 not 4.27

³ Paragraph: 002 Reference ID: 10-002-20190509

consideration of this requirement within the Viability Report and site specific viability appraisal.

- 6.9 Harworth reserves the opportunity to comment further on this policy at a later stage, once an updated assessment has been undertaken.

Tests of Soundness

- 6.10 Harworth considers that Policy HS5 fails to meet the tests of soundness because:

- 1 **It is not justified:** The cost of providing off-site financial contributions for open space requirements in line with the standards and methodology set out in Policy HS5 should be factored into viability considerations for the site.
- 2 **It is not consistent with national policy:** The 2023 NPPF and PPG are clear that viability assessments should be undertaken at the plan making stage. There is currently limited information set out in the viability calculation in relation to open space requirements.

Recommended Changes

- 6.11 The Central Lancashire Local Plan Main Viability Report should be updated to ensure all relevant consideration are factored into the appraisal with accurate and proportionate costs for open space requirements.

7.0 **Policy HS6: Housing Mix and Density**

7.1 Policy HS6 sets out requirements for housing mix and expected densities on housing sites across Central Lancashire.

7.2 Policy SS5 refers to Policy HS6 and states that development of the site will be expected to accord with policy HS6 delivering an appropriate mix and density of housing.

Consideration of Policy

7.3 Policy HS6 sets out that 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 address the needs for that location as identified in the Housing Need and Demand Assessments; and
- b Build all dwellings to M4(2) accessible and adaptable standard; 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.

Housing Needs and Demand Assessments

7.4 A Housing Need and Demand Assessment (HNDA) was prepared for each of the Central Lancashire authorities in 2024, which provide the Council's with up-to-date evidence on housing need across all sections of the community over the period 2023 to 2041. Table D8 of the Preston HDNA summarises the overall dwelling type/ size and tenure mix recommendations for each sub-area of Preston. The site is located in the sub-area 'West', which sets out a range for each dwelling type / size.

7.5 Harworth has concerns regarding the market mix ranges presented and considers that additional flexibility should be provided within the Policy by presenting the mix as wider ranges which allows for site-specific considerations to be taken into account, as well as changes to market factors which may influence need and demand in future. This is particularly important at this site given the long-term nature of its delivery and the policy needs to be flexibility enough to account for market change of the period of time it will take this site to come forward.

7.6 Rather than apply a prescriptive approach to each sub-area of Preston, site-specific considerations should also be a material consideration for a site's proposed housing mix whilst also being in broad alignment with the recommendations in the Housing Needs Demand Assessments. For example, when formulating an appropriate housing mix, it is important to factor in any local market considerations. This will ensure that future development responds to the specific needs of a local area at that point in time and does not compromise appropriate site-specific housing mixes from being delivered.

Specialist Dwelling Requirements

7.7 Part b of Policy HS6 requires that all sites of 10+ dwellings are built to a M4(2) accessible and adaptable standard, which would include bungalow / level access accommodation.

7.8 Harworth is supportive of providing housing for people with additional needs but considers that a blanket requirement for all properties to be built to an M4(2) standard is not justified or appropriate.

7.9 The Preston HNDA 2024 states that this requirement takes into account the ageing demographic of Preston and will ensure that new dwellings can be occupied and also visited by people needing accessible/adaptable dwellings. It is not clear within the 2024 HDNA how this assumption has been quantified, and there is no clear evidence as to how this requirement has been derived. Furthermore, the PPG makes reference to a number of factors that can be taken into account when evidencing a need to set higher adoptable standards⁴. Of the factors referred in the PPG, Harworth does not consider that the potential viability impact has been fully considered in the formulation of Policy HS6.

7.10 There appears to be no consideration set out in the Central Lancashire Local Plan Main Viability Report (February 2025) of whether providing all M4(2) compliant dwellings would have adverse viability implications. The policies matrix set out in Appendix 1 of the Viability Report states a baseline assumption of £1,109 per unit for flats, and £626 per unit for houses. Requiring all dwellings to be M4(2) compliant across the site will have significant cost implications and must be appropriately factored into viability assumptions and the overall site appraisal. For example, Harworth and other developers may provide a number of 2-3 storey apartments on development sites to accommodate smaller units and ensure that the required policy mix can be met. In these instances, it is not practical or viable to provide lifts to upper floors in 2-3 storey apartment blocks and as such, a degree of flexibility is required in this policy rather than a prescriptive requirement on all dwellings.

Densities

7.11 To promote the effective use of land the following minimum gross densities are required on all housing developments:

- 1 Preston City Centre - 86dph;
- 2 Town, District and Local Shopping Centres – 40dph;
- 3 Other locations within settlement boundaries – 27dph;
- 4 Outside settlement boundaries - 21dph.

7.12 Based on the CLLP Policies Map published with the consultation material, Harworth understands that the site is situated within the Preston settlement boundary and a minimum gross density requirement of 27dph therefore applies. Harworth objects to the minimum densities set out in the policy as it is concerned that these gross densities will be too high, particularly for a site such as Preston West. If applying a gross to net conversion (based on the actual net developable area of the site) these densities are considered too high, particularly for ‘other locations within settlement boundaries’ such as Preston West and would have implications for the design of schemes at the planning application stage. The gross densities currently stated might be appropriate for areas within the Preston West site around the potential new local centre, or in proximity to the proposed Cottam Parkway Train Station, but would not be appropriate in other areas of the site towards the periphery where far lower densities would be more suitable.

⁴ Planning Practice Guidance - Paragraph: 007 Reference ID: 56-007-20150327

- 7.13 The policy requirements for minimum densities must consider the gross to net conversion based on the developable area of the site and should therefore be reduced accordingly, with the requirements based on net developable area to account for site constraints, policy requirements and any supporting infrastructure such as roads or community uses. Flexibility must also be incorporated into the policy to allow for higher densities where it is considered appropriate based on site context and site specific considerations, such as locations around the Cottam Parkway Train Station.

Tests of Soundness

- 1 **It is not effective:** Sufficient flexibility has not been incorporated into the policy and the policy does not allow for site-specific considerations to be taken into account, as well as changes to market factors which may influence need and demand in future.

Basing minimum densities on gross developable area is not effective. The policy requirements for minimum densities must be based on net developable area to ensure planning applications for residential development are not adversely impacted.

It is not justified: The CLLP and its evidence base has not provided sufficient evidence or justification to support the approach requiring 100% M4(2) dwellings. There is no clear justification to support this blanket approach other than reference to changing demographics in the Borough. The viability impact of providing 100% M4(2) dwellings should be thoroughly considered as part of the site-specific viability appraisal for Preston West.

No justification has been provided for basing minimum densities on gross developable area, rather than net.

Recommended Changes

- 7.14 In order to ensure that Policy HS6 is sound, it is requested that the Council:

- 1 Ensure that part a of the Policy is appropriately worded to make certain that housing mixes can respond to site specific considerations and local market evidence. Additional flexibility should be provided within the Policy by presenting the mix as wider ranges which allows for site-specific considerations to be taken into account, as well as changes to market factors which may influence need and demand in future.
- 2 Ensure that part b of the Policy has fully considered the viability of providing 100% M4(2) properties on sites of 10+ dwellings and the impact this may have on density and mix for strategic site allocations, including Preston West. Flexibility should be provided in the Policy to allow for instances where providing 100% M4(2) dwellings may not be possible due to site specific circumstances, certain dwelling types such as apartments and viability considerations. Harworth would support a policy requirement which is more generic and less prescriptive in terms of suiting the needs of older residents.

- 7.15 Policy HS6 should be amended to reference net developable areas when setting out minimum residential densities and flexibility must also be incorporated into the policy to allow for higher densities where it is considered appropriate based on site context and site specific considerations.

8.0 **Policy HS7: Affordable Housing**

Introduction

8.1 Policy HS7 (Affordable Housing) sets out the affordable housing requirement and tenure for each of the Central Lancashire authorities and their respective settlements.

8.2 Policy SS5 refers to Policy HS7 and states that development of the site will be expected to accord with policy HS7 to deliver the required percentage, tenure and mix of affordable housing. Self-build and custom-build residential development are also supported.

Consideration of Policy

8.3 Policy HS7 sets out that all residential developments of 10 or more dwellings or, on a site of 0.5 hectares or more in size, must deliver affordable housing as follows:

- a A minimum of 30% of the total number to be provided on sites in Tiers 1, 2 and 3 of the settlement hierarchy.
- b A minimum of 35% of the total number to be provided on sites in all other locations.

8.4 A table is provided under part 5 of the Policy which sets out the proposed tenure split for affordable housing across the three Central Lancashire authorities. The Policy states that the tenure split in the table must be provided unless it can be robustly demonstrated that an alternative split meets an independently assessed proven need, or it is demonstrated to the Council that the development would not otherwise be financially viable.

8.5 For Preston, a tenure split of 76% (52% Social Rent/24% Affordable Rent with a priority for Social Rent) and 24% Affordable Home Ownership including First Homes, is proposed in the policy. The proposed tenure split is based on the assessment undertaken in the Preston HDNA 2024. CLLP para. 4.58 states that the shift towards home ownership reflects the impact of First Homes on overall tenure split and a specific need for affordable home ownership products evidenced in the 2021 household survey. Harworth has no issues with the proposed tenure split for Preston, provided this has no adverse viability implications and it is ensured that adequate flexibility is incorporated into the policy.

8.6 Currently, the policy does allow for some flexibility to propose an alternative tenure split. Part 5 states that the tenure split must be provided unless it can be robustly demonstrated that an alternative split meets an independently assessed proven need, or it is demonstrated to the Council that the development would not otherwise be financially viable. Furthermore, part 7 states that the size and type of affordable housing provided must accord with Policy HS6 unless robust evidence of a specific need is demonstrable. This allows for an up-to-date assessment of affordable housing need to be undertaken at the planning application stage which can respond to market factors and the needs of the local area at that specific time.

8.7 However, it is also not clear whether this requirement has been factored into the Central Lancashire Local Plan Main Viability Report (February 2025). The PPG sets out that the role for viability assessment is primarily at the plan making stage, and this tenure requirement should therefore be adequately factored into viability appraisals rather than

relying on viability assessments submitted at the planning application stage to demonstrate that a site is viable.

- 8.8 Part 17 of Policy HS7 sets out that a 20% supplement, calculated on the total value of the commuted sum, shall be payable to the Council in addition to the commuted sum to cover the cost of administration of an affordable housing commuted sum. This is in addition to any other fees payable for the developer contributions. Harworth acknowledges that authorities can charge a monitoring fee through section 106 planning obligations, to cover the cost of monitoring and reporting on delivery of that section 106 obligation. Monitoring fees can be used to monitor and report on any type of planning obligation, for the lifetime of that obligation. However, Harworth disagrees with the 20% requirement as this level of fee is not justified within the CLLP or its accompanying evidence base and is not supported by or consistent with national policy. The PPG⁵ states that fees could be a fixed percentage of the total value of an individual obligation. However, in all cases, monitoring fees must be proportionate and reasonable and reflect the actual cost of monitoring. Harworth considers that the 20% fee is not proportionate and reasonable and could be considered to be excessive.
- 8.9 This percentage is not advocated in national policy or guidance, is not consistent with the CIL tests set out in NPPF para. 57⁶ and the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019. The percentage should therefore be significantly reduced unless it can be adequately demonstrated by the Central Lancashire authorities that this percentage is appropriate and justified.

Tests of Soundness

- 1 **It is not justified** – The 20% administration supplement for affordable housing commuted sums is not justified within the CLLP or the associated evidence base;
- 2 **It is not consistent with national policy** - the CLLP Viability Report does not include the required tenure split within the site-specific viability appraisal for Preston West. This approach is not consistent with national policy which requires viability considerations to be fully assessed at the plan-making stage rather than relying on viability assessments at the planning application stage.

The 20% administration supplement is not proportionate and reasonable and could be considered to be excessive, and therefore conflicts with guidance set out in the PPG and the CIL Regulations (2019).

Recommended Changes

- 1 The 20% administration supplement for affordable housing commuted sums should be significantly reduced, unless it can be adequately demonstrated by the Central Lancashire authorities that this percentage is appropriate and justified.
- 2 The CLLP Viability Report should be updated and a site-specific appraisal for Preston West needs to be undertaken which assess whether the proposed tenure split in Policy HS7 is appropriate and justified and does not adversely impact the viability of the site.

⁵ Paragraph: 036 Reference ID: 23b-036-20190901

⁶ Set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010

9.0 **Policy EN1: Well Designed Places**

9.1 Policy EN1 sets out a number of design considerations and requirements for new developments.

Consideration of Policy

9.2 Policy SS5 refers directly to Policy EN1 and sets out that the masterplanning objectives for the site are to create a well-designed and integrated extension to the Preston Urban Area whilst maintaining the rural character of settlements to the west of the Edith Rigby Way. It also states that a detailed masterplan, including the preparation of a Design Code and Infrastructure and Delivery Strategy covering the whole of the allocation must be agreed by the Council prior to the granting of planning permission on any remaining part of the site. The policy also states that a development framework is required for the whole allocation (Phase A and Phase B).

9.3 Harworth supports a requirement for the preparation of a detailed masterplan, including the preparation of a Design Code and Infrastructure and Delivery Strategy. Harworth also agrees that a development framework is required for the whole allocation (Phase A and Phase B) to ensure the effective coordination between multiple land interests. However, Harworth considers that the preparation of the masterplan and the accompanying Design Code and Infrastructure and Delivery Strategy should be led by the applicant and master developer for the scheme, in coordination with the Council and relevant statutory consultees.

9.4 It is also considered that this process should be undertaken during determination of a planning application, and there should not be any requirement to formally approve these documents prior to submission.

Tests of Soundness

9.5 Harworth has no issues in principle with the requirements of Policy EN1, provided it is established that the process should be led by the applicant and master developer for the site and can be agreed during the planning application determination period rather than prior to submission.

Recommended Changes

9.6 No changes are recommended to the wording of the policy as currently drafted, provided the above points are clearly established through adoption of the CLLP.

10.0 **Policy EN2: Design Criteria for New Development**

- 10.1 Policy EN2 states that all major development amending existing or proposing new streets and open spaces should be climate change resilient and outlines a number of design criteria for major development.

Consideration of Policy

- 10.2 The Policy requires all major development amending existing or proposing new streets to be climate change resilient. However, limited guidance is set out within the CLLP or its evidence base on how the public realm can be made climate change resilient, aside from the provision of blue and green infrastructure and heat/drought resistant soft landscaping. The current wording of this part of the policy is vague and ineffective.

Tests of Soundness

- 1 **It is not effective:** It is considered that to be effective, the Policy should provide further guidance on how the public realm can be climate change resilient to effectively assess proposed developments against the policy.

Recommended Changes

- 10.3 The Central Lancashire authorities should consider whether the policy is necessary and justified and provided it is, add clear criteria for developers to demonstrate how improvements to, or new public realm development can be made climate change resilient.

11.0 **Policy ID1: Infrastructure Planning Principles**

Introduction

- 11.1 Policy ID1 sets out a number of considerations in relation to the provision of infrastructure as part of new developments, including the phasing of developments and coordinated delivery of infrastructure and a requirement for new development that is likely to create an identified shortfall in infrastructure capacity or exacerbate existing deficiencies to adequately mitigate or compensate for those shortfalls and deficiencies.
- 11.2 Policy SS5 states that an infrastructure delivery schedule linked to the phases of development on the site will be required.

Consideration of Policy

- 11.3 It is likely that the Preston West site will require the delivery of key infrastructure across the site to enable the site to come forward for comprehensive development. This includes a requirement to facilitate the delivery of a bridge over the existing railway line to provide a link between development parcels between Phase A and Phase B (land south of the railway) and/or a new junction off Edith Rigby Way. This important infrastructure requirement is expected to be delivered through a separate funding mechanism. This must also be reflected in an updated site-specific viability appraisal, with all relevant infrastructure requirements factored in.
- 11.4 The 2023 NPPF (para. 58) is clear that all viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning practice guidance [PPG]. The PPG sets out that the role for viability assessment is primarily at the plan making stage, and drafting of plan policies should be iterative and informed by engagement with developers and landowners⁷. Further engagement must therefore be conducted with Harworth to ascertain an updated picture of viability at the plan-making stage.

Tests of Soundness

- 1 **It is not effective:** Policy ID1 should be directly informed by an up to date viability appraisal which includes all relevant information, including any potential infrastructure requirements.

Recommended Changes

- 11.5 An updated viability assessment which factors in all relevant infrastructure requirements should be undertaken, and further engagement conducted with Harworth to understand all likely infrastructure requirements, how they are expected to be delivered, and additional funding mechanisms. This will provide the basis for the policy requirements for infrastructure delivery set out in Policy ID1.

⁷ Paragraph: 002 Reference ID: 10-002-20190509

12.0 **Policy ID2: Planning Obligations**

Introduction

12.1 Policy ID2 sets out expectations for developers to contribute to mitigating its impact on infrastructure, services and the environment and to contribute to the requirements of the community. The policy includes details of the potential contributions that may be required as part of new developments.

12.2 Policy SS5 references ID2 and states that a planning contribution may be required to help mitigate the impacts of development and secure affordable housing, education and other contributions in line with policy ID2.

Consideration of Policy

12.3 Harworth recognises that financial contributions will likely be required to mitigate the impact of development proposals on infrastructure and services for Preston West. However, it is important that any requirements for financial obligations are directly related to the development and should enable the development to be deliverable in accordance with the NPPF.

12.4 Part 2 of the Policy sets out a list of numerous different requirements for contributions which developers may be required to deliver. Harworth considers that it is important for any potential financial contributions to be fully justified and based on a credible and robust evidence base, reasonable in terms of the relationship to the development, and not unduly restrictive so as to affect the viability and deliverability of the development. The financial contributions requested should meet the tests as set out in NPPF para. 57:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and,
- Fairly and reasonably related in scale and kind to the development.

12.5 Policy SS5/Policy ID2 should make direct reference to the above CIL tests and that the policy is clear that any financial contributions required by the Council will be considered in this context.

12.6 Harworth also notes that 'biodiversity offsetting' has been included as a potential contribution. It is not clear what contributions could be required as part of this. Under biodiversity net gain legislation, a 10% net gain in biodiversity is required to be delivered on new developments. Therefore, Harworth considers that that there is no reason for this to be included as a specific contribution in the list set out in Policy ID2 as it is already covered by statutory legislation. Including additional requirements for contributions as part of Policy ID2 would inevitably lead to an element of double counting and this approach is not justified or appropriate.

12.7 Part 5 of Policy ID2 also states that the Council will charge a monitoring fee to cover the cost of monitoring and delivery of a S106 obligation. Harworth does not have a concern with this in principle and it is acknowledged that authorities can charge a monitoring fee through section 106 planning obligations, to cover the cost of monitoring and reporting on

delivery of that section 106 obligation. The PPG⁸ states that fees could be a fixed percentage of the total value of an individual obligation, but that in all cases, monitoring fees must be proportionate and reasonable and reflect the actual cost of monitoring. Harworth notes that any fee must be proportionate and reasonable and should not be excessive.

Tests of Soundness

- 1 **It is not effective:** the policy does not make specific reference to the CIL tests set out in NPPF para. 57 which are designed to ensure that any potential financial contributions are fully justified and based on credible and robust evidence.
- 2 **It is not justified:** Part 2 (j) is not clear on what contributions are required for 'biodiversity off-setting' and there is no justification provided to demonstrate that this is required in addition to the statutory 10% biodiversity net gain requirement.

Recommended Changes

- 12.8 The policy should include reference to the CIL tests set out in NPPF para. 57. Reference to 'biodiversity off-setting' should also be removed from the list set out in Part 2 of the policy.

⁸ Paragraph: 036 Reference ID: 23b-036-20190901

13.0 **Policy ST2: Sustainable and Active Travel**

13.1 Policy ST2 sets out a number of sustainable travel requirements, including those related to active travel. The policy also details a number of requirements relating to highways and the safe and efficient movement of vehicles.

13.2 Policy SS5 refers directly to Policy ST2 and sets out a number of site-specific requirements.

Consideration of Policy

13.3 Harworth supports the integration of active travel requirements within Policy SS5 and for new developments.

13.4 Part 4 of the policy states that contributions may be sought towards projects identified within the Central Lancashire Local Cycling and Walking Infrastructure Plan, and Part 7 states that where significant impacts are identified within a Transport Statement, contributions may be sought towards mitigation projects. In this context, it is important to highlight that financial contributions requested by the Council should meet the tests as set out in NPPF para. 57.

13.5 Harworth also notes that there is no inclusion within the CLLP Viability Report for contributions towards projects identified within the Central Lancashire Local Cycling and Walking Infrastructure Plan. An updated viability appraisal should therefore consider any potential projects.

Tests of Soundness

- 1 **It is not justified:** In the context of Policy SS5, further consideration in the CLLP Viability Report must be given towards projects identified within the Central Lancashire Local Cycling and Walking Infrastructure Plan.

Recommended Changes

13.6 In accordance with national policy and guidance, an updated viability assessment which factors in potential contributions towards projects identified within the Central Lancashire Local Cycling and Walking Infrastructure Plan should be undertaken. This will provide the evidence required to demonstrate whether the requirement at part 4 of Policy ST2 is justified.

14.0 Policy EN4: Amenity

14.1 Policy EN4 sets out that measures to protect where possible enhance both visual and residential amenity.

Consideration of Policy

14.2 Policy SS5 references Policy EN4 (amenity) and notes that the site is bounded by Edith Rigby Way to the west and Lea Road to the east. The railway lines transect the site separating it into two Phases, Phase A North of the Railway Line and Phase B South of the Railway line. The Lancaster Canal also runs across Phase A.

14.3 The site-specific policy states that to ensure acceptable level of amenity for housing near these routes, a buffer should be included and the stability of operational railway land should also be protected.

14.4 Harworth has no issue in principle with a requirement to include a buffer around these key routes, provided it is demonstrated that this is required following the completion of detailed technical work which will be undertaken during masterplan preparation and through detailed design at planning application stage. Technical work undertaken to support the preparation of a planning application and masterplan may demonstrate that a buffer is not required, or that other forms of mitigation may be appropriate to protect the amenity of potential new residents. The policy should therefore be updated to reflect this possibility and incorporate some flexibility and should not include a straight obligation for inclusion of a buffer if it is proven that it may not be necessary.

14.5 It is also likely that any buffers around these key routes identified in the policy would have the effect of further reducing the net developable area of the site, and this must be factored into consideration of an appropriate quantum of development as part of the draft allocation.

Tests of Soundness

- 1 **It is not justified:** no technical work has been undertaken to support the draft allocation which demonstrates that there should be any obligation for a development buffer from key routes such as the strategic road network, canal and railway line. Flexibility should therefore be incorporated into the policy to respond to the outcome of detailed technical work which may demonstrate that no buffer is required or to allow for alternative forms of mitigation.

Recommended Changes

14.6 In order to address the above, Harworth suggests the following amendment to the wording of Policy SS5:

- 1 *“The site is bounded by Edith Rigby Way to the west and Lea Road to the east. The railway lines transect the site separating it into two Phases, Phase A North of the Railway Line and Phase B South of the Railway line. The Lancaster Canal also runs across Phase A. To ensure acceptable level of amenity for housing near these routes, any masterplan for the site should investigate the use of a buffer or offsets **as part of the technical work to make the development acceptable.**”*

15.0 **Policy EN7: Designated Sites for Nature Conservation**

15.1 Policy EN7 seeks to ensure that developments avoid adverse impacts on designated sites and their qualifying features.

15.2 Policy SS5 sets out that to provide certainty that the loss of functionally linked land within the site allocation will not adversely affect the integrity of SPA and Ramsar sites, a wintering bird survey is required alongside any planning application in accordance with Policy EN7.

Consideration of Policy

15.3 Part 1 of Policy EN7 refers to a list of designated sites of international, national and local importance within Central Lancashire, and includes 'Wildlife Corridors' within this list.

15.4 Annex 2 (Glossary) of the 2023 NPPF defines international, national and locally designated sites of importance for biodiversity as '*All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.*' Harworth considers that 'Wildlife Corridors' should not be identified as a locally designated site as they do not fall within the NPPF definition. The CLLP does not provide a definition for Wildlife Corridors, and they do not appear to have been identified on the accompanying policies map. Therefore, 'Wildlife Corridors' should not be listed in part 1 of the Policy.

Tests of Soundness

- 1 **It is not consistent with national policy:** 'Wildlife Corridors' are not defined as a locally designated site in the NPPF.
- 2 **It is not justified:** there is no justification to support 'Wildlife Corridors' being included within the policy as a locally designated site. The CLLP also does not provide a definition for Wildlife Corridors, and they do not appear to have been identified on the accompanying policies map.

Recommended Changes

15.5 In order to ensure that Policy EN7 is sound it is recommended that Wildlife Corridors are removed from the list at Part 1 of the Policy.

16.0 **Policy EN10 (Development and Flood Risk)**

Introduction

16.1 Policy EN10 provides guidance on directed development from areas at highest risk of flooding across Central Lancashire.

Consideration of Policy

16.2 Part 1 of the Policy states:

'Proposals for development shall avoid areas at higher risk of flooding (as defined in the PPG) from all sources, considering the current and future impacts of climate change – so as to avoid any increased flood risk to people and property during the design flood.'

16.3 Harworth considers that Policy EN10 part 1 is not fully consistent with the wording contained in the PPG, which sets out that proposals for development shall avoid current and future areas of medium and high flood risk, **so far as possible** [Lichfields emphasis]⁹.

16.4 The policy is also not clear in terms of defining when there are instances where development is appropriate in areas at higher risk of flooding, such as SUDS features and green infrastructure. The wording of part 1 of the policy is therefore unclear and could be misinterpreted when read.

16.5 PPG updates on flood risk are expected to be published later this year. Therefore, part 1 of the policy needs to be updated to reflect the above and to ensure it is consistent with any future updates to guidance regarding flood risk considerations.

Tests of Soundness

- 1 **It is not consistent with national policy:** the wording of part 1 of the policy is not entirely consistent with the PPG which sets out that proposals for development shall avoid current and future areas of medium and high flood risk, so far as possible.
- 2 **It is not effective:** The policy is also not clear in terms of defining when there are instances where development is appropriate in areas at higher risk of flooding.

Recommended Changes

16.6 Harworth considers that part 1 of the Policy should be amended to ensure that it is compliant with guidance contained in the PPG and to ensure the policy can be easily interpreted regarding instances where development is appropriate in areas at higher risk of flooding. Additional consideration of matters related to flood risk and drainage should be deferred to the masterplan preparation stage and through detailed technical work to support individual planning applications, and this wording could also be incorporated into the policy.

⁹ Planning Practice Guidance Paragraph: 023 Reference ID: 7-023-20220825

17.0 **Conclusion**

- 17.1 These representations to the CLLP Reg. 19 version have been drafted in the context of Harworth's committed land interest with the draft Preston West strategic allocation (Policy SS5).
- 17.2 Harworth strongly supports the draft Preston West allocation (Policy SS5) and considers that the site represents an excellent opportunity to deliver a sustainable, high-quality and attractive residential-led development. Harworth considers that the site presents an opportunity to deliver a high-quality development in one of the most sustainable locations in Central Lancashire which will benefit from, and provide, a range of facilities, services, open spaces, and jobs, and facilitate extensive use of active travel and public transport.
- 17.3 Harworth also considers that there are a number of potential areas for modification regarding the overall principles for the use and quantum of development on the site, as well as the wording and requirements of the site-specific policy and other policies contained within the plan. Harworth would like to work closely in collaboration with the Council to ensure modifications to the draft policy can be facilitated, to set the basis for the comprehensive delivery of the site.

the 1990s, the number of people with a mental health problem has increased in the UK (Mental Health Act 1983, 1990).

There is a growing awareness of the need to improve the lives of people with mental health problems. The Department of Health (1999) has set out a strategy for mental health care in the UK. The strategy is based on the following principles:

- People with mental health problems should be treated as individuals.
- People with mental health problems should be given the opportunity to participate in decisions about their care.
- People with mental health problems should be given the opportunity to live in their own homes.

The strategy also states that people with mental health problems should be given the opportunity to live in their own homes.

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