Central Lancashire Local Plan - Matters Papers Hearing Statement

Matter 1b Overarching Matters

Harworth Estates Investments Ltd

Representor ID: A61

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1.0 Introduction

1.1 Lichfields is appointed by Harworth Estates Investments Ltd [Harworth] (Representor ID: A61) to prepare Matters Papers relating to the emerging Central Lancashire Local Plan [CLLP].

1.2 This Written Statement has been prepared in response to the Matters, Issues and Questions [MIQ] raised by the Inspectors for the Examination in Public [EiP] hearing sessions. The Written Statement addresses the following Matter:

- Matter 1b - Overarching Matters

1.3 Other Matters Papers have also been prepared by Lichfields on behalf of Harworth to address the following:

- Matter 2 - Vision & Objectives, Spatial Strategy & Location of New Development, and Site Selection Process
- Matter 4 - Strategic Sites & Mixed Use Allocations (Policy SS5 - Preston West)
- Matter 7 - Housing Policies
- Matter 8 Issue 8 - Employment Land Need
- Matter 14 - Sustainable Travel, Infrastructure and Delivery, and Monitoring

1.4 These Matters Papers have been drafted in the context of Harworth's land interest in the draft Preston West strategic allocation (draft Local Plan Policy SS5) ('the Site'). Harworth has an interest in a large proportion of land across the site, including the Tallentine land, and is committed to progressing a high-quality, sustainable, attractive and accessible development, complementing the existing residential and employment 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. Harworth has been working 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.

1.6 These Matter Papers representations should be read in conjunction with previous submissions on the CLLP (Representor ID A61) as well as those made on other Matters listed above. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework ('NPPF') (December 2023) and the National Planning Practice Guidance ('PPG').

2.0 Matter 1b - Overarching Matters

Q1.11 - Is the Plan period (2023 - 2041) justified, effective and consistent with national policy which requires strategic policies to look at least 15 years ahead from adoption? Should the requirements/timescales for review of the Plan be set out in policy?

2.1 Paragraph 22 of the NPPF is clear that strategic policies should look ahead over a minimum 15-year period from adoption. Should it be found sound at EiP, the Central Lancashire Local Plan (CLLP) is likely to be adopted in mid-late 2026. However, to comply with the minimum 15-year timeframe, it would need to be adopted before 31st March 2026. With EiP hearing sessions scheduled for January 2026, and other statutory stages of the plan-making process, including consultation on any main modifications, it is unlikely that the plan will be adopted before this date. Therefore, to comply with the minimum requirement to look ahead 15 years from adoption, the plan period would need to be extended to at least 2042.

Q1.12 - What are the implications of the transitional arrangements set out in paras 234 and 235 of the NPPF (Dec 2024) for the examination of the Plan?

2.2 Paragraph 234 of the NPPF states that where a local plan has reached Regulation 19 stage on or before 12th March 2025, and the draft housing requirement meets at least 80% of local housing need, the plan does not need to be examined under the December 2024 version of the NPPF.

2.3 The Regulation 19 consultation on the CLLP commenced on 24th February 2025. The housing requirement was increased by 77 dpa (to 1,314 dpa) equating to exactly 80% of the standard methodology figure at the time (1,643 dpa) across the three districts. The Councils have acknowledged at CLLP paragraph 4.19 that this revision was made solely to comply with the transitional arrangements set out in paragraph 234 of the NPPF.

2.4 It is important to note that the LHN figures for the three districts have since been updated by virtue of updated dwelling stock figures and affordability ratios. The total figure now equates 1,687 dpa. The CLLP's annual housing target of 1,314 dpa now represents only 77.9% of this figure, falling short of the minimum 80% threshold specified in paragraph 234a of the 2024 NPPF.

2.5 Paragraph 235 of the NPPF states that if any of the exclusions in paragraph 234 apply, the plan should be examined under the relevant previous version of the NPPF. In this case, that would be the December 2023 version. However, as the housing requirement no longer meets the minimum 80% threshold of local housing need, the CLLP should not proceed under the December 2023 version, or the LHN figure should be updated to ensure it meets 80% of the standard methodology figure.

2.6 Should the CLLP seek to meet the minimum 80% LHN threshold, Harworth considers that the Preston West site has the potential to accommodate the delivery of additional housing within the plan period to address any potential shortfall. Harworth considers that a modest increase would be appropriate and achievable, beyond the current 450 dwellings currently identified within the plan period.

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