

# **Central Lancashire Local Plan - Matters Papers Hearing Statement**

## **Matter 2 - Vision & Objectives, Spatial Strategy & Location of New Development, and Site Selection Process**

**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 2 - Vision & Objectives, Spatial Strategy & Location of New Development, and Site Selection Process
- 1.3 Other Matters Papers have also been prepared by Lichfields on behalf of Harworth to address the following:
- Matter 1b - Overarching Matters
  - 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 2 - Vision & Objectives, Spatial Strategy & Location of New Development, and Site Selection Process**

**Q2.1 - Is the proposed spatial strategy and the distribution of development (as set out in policies SS1 and SS2) supported by robust and up to date evidence and otherwise soundly based? In particular:**

### **a) Does it reflect the vision and objectives of the Plan?**

- 2.1 The Spatial Vision for Central Lancashire in the CLLP highlights that the delivery of new employment opportunities will continue to strengthen economic prosperity, making Central Lancashire a key economic centre for the North West, and that a wide range of high-quality sustainable new housing and supporting infrastructure will meet the needs of our diverse communities, delivering vibrant and distinct places. Strategic Objective 2 (Sustainable Patterns of Development) sets out that development will be focused on sustainable locations and accessible by active modes of travel, making the best use of existing land, infrastructure, facilities, and services wherever possible.
- 2.2 Policy SS1 (Development Patterns) states that new housing, employment and commercial growth and associated infrastructure will be focused on the most sustainable locations in Central Lancashire. This is consistent with the vision and objectives of the Plan set out above. The proposed spatial strategy and the distribution of development seeks to direct a significant proportion of growth towards large urban areas, including Preston as the primary Tier 1 settlement. CLLP Policy SS2 seeks to direct the largest amount of new development to the Preston Urban Area and Harworth supports this as 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.
- 2.3 Policy SS1 also 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 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 City, the Tier 1 settlement within the combined area.

### **b) To what degree is the distribution of development set out in Policy SS2 based on the settlement hierarchy in Table 1?**

- 2.4 The Central Lancashire Authorities Response Document sets out that the settlement hierarchy stems from the work which underpinned the extant Central Lancashire Core Strategy. The response explains that the settlement hierarchy reflects the range of services, level of employment opportunities and how accessible places are. Table 1 of the response document sets out the proposed housing development by Settlement Tier. This is included below for reference.

Figure 1 Proposed Housing Development by Settlement Tier

**Table 1 Proposed Housing Development by Settlement Tier - 1<sup>st</sup> April 2025 – 31<sup>st</sup> March 2041**

Settlement Tier	Chorley	Preston	South Ribble	Total	% of total
Tier 1 – Preston Urban Area	N/A	9,501	N/A	9,501	44.54
Tier 2 – Key Service Centres	1,657	0	5,393	7,050	33.05
Tier 3 – Urban Local Service Centres	1,941	294	308	2,543	11.92
Tier 4 – Rural Local Service Centres	107	209 <sup>1</sup>	147	463	2.17
Tier 5 – Smaller Rural Villages and Hamlets	339	942 <sup>2</sup>	286	1,567	7.35
Green Belt	37	0	168	205	0.96
<b>TOTAL</b>	<b>4,081</b>	<b>10,946</b>	<b>6,302</b>	<b>21,329</b>	<b>100</b>

<sup>1</sup> Includes Keyfold Farm In Broughton permitted on Appeal

<sup>2</sup> Includes 2 sites - Homes England development of Brownfield land at Whittingham Hospital allocated through the extant Core Strategy and Land at Cardwell Park which was granted planning permission on appeal. No new allocations identified in the CLLP.

Source: Central Lancashire Authorities Response Document

- 2.5 A large proportion of housing growth is directed towards the Preston Urban Area, and Harworth considers that this is an appropriate approach given its size, sustainability and position within the settlement hierarchy.

**c) Is the focus on the larger urban settlements justified and soundly based?**

- 2.6 Given that Preston Area is the largest settlement within Central Lancashire and benefits from wide-ranging transport links and access to extensive provision of health, education, leisure and cultural services and facilities, it is considered appropriate to designate a significant proportion of growth to the city. 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. Preston is able to easily and readily accommodate high levels of growth through new large-scale allocations.
- 2.7 The NPPF 2023 (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.
- 2.8 The current approach as set out in this Plan to meeting Preston’s 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, and Preston is the most sustainable settlement to facilitate this. The development of some greenfield allocations is more likely to be viable, deliver affordable housing and a varied mix of housing types and tenures.

**Q2.2 - What is the evidential basis for the settlement hierarchy in policy SS2? Is this consistent across all 3 authorities? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?**

- 2.9 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. Preston is identified as the Tier 1 settlement within the settlement hierarchy and is capable of accommodating a significant proportion of the required growth over the next plan period, particularly on large scale strategic allocations such as Preston West.

**Q2.4 - Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?**

**a) Is the site selection process transparent? How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?**

- 2.10 In relation to Preston West, the Site has been assessed as part of the Council's site selection process throughout the preparation of the CLLP, and was assessed through the Council's Strategic Housing and Employment Availability Assessment (SHELAA) process. The site has been subject to detailed assessments including:
- Strategic Flood Risk Assessment (Level 1 & 2) (FR01, FR02 & FR03)
  - Integrated Assessment (CDO5 & CDO6)
  - Habitats Regulations Assessment (CDO7)
  - Highways and Transport Assessment (IT06a)
  - Heritage Impact Assessment (HE01)
  - Utilities access/provision
- 2.11 The draft Local Plan allocations were decided taking into account the findings of the detailed SHELAA stage 2 assessments, the proposed spatial strategy and the settlement hierarchy. The SHELAA summarises the justification for site selection as: 'Suitable, available and achievable'.
- 2.12 A detailed Preston West Topic Paper (Reference ID TPO8) has also been prepared to support the allocation of the Site. The Topic Paper outlines the issues and constraints, in the context of the draft Local Plan policy, and how these can be addressed to ensure the delivery of development at the site. This is summarised in further detail in Harworth's response to Matter 4.

**b) Were constraints given relative weight in the site selection process? If so, how was this determined?**

2.13 In relation to the allocation of Preston West, as set out in the accompanying Topic Paper (TPO8), all constraints associated with this site were considered in detail as part of the site selection process which could affect delivery and viability considerations. It is considered that the issues raised can be addressed and are not considered to be detrimental to the allocation or delivery of the site. The statutory consultees have not objected to the progression of the site to allocation.

**c) In relation to flood risk, were sites at low risk preferred over those at greater risk? How did the Strategic Flood Risk Assessment (SFRA) inform site selection? Does the SFRA2 reflect the most up to date flood-mapping? Where sites are proposed for development in areas of flood risk, does the Plan take a sound approach in how these matters will be addressed?**

2.14 A Level 2 Strategic Flood Risk Assessment (SFRA 2) was completed in February 2025 for Preston West (SHLAA Ref 19P031). This formed key evidence in the site selection process of the Central Lancashire Local Plan. The SFRA 2 for the site was updated in June 2025 based on the Environment Agency Flood Map for Planning (May 2025) and the Risk of Surface Water Map (RoFSW).

2.15 SFRA 2 identifies 6% of the site along the southern boundary with Savick Brook as Flood Zone 3b. This area is also identified as at risk in the event of reservoir failure. However, this area is not likely to be developed, and the majority of the site (96%) is in Flood Zone 1 and is at either low or very low surface water flood risk. The SFRA 2 concludes that there is no risk of groundwater emergence across the site. Overall, the Site is at low risk from flooding.

2.16 Additional consideration of matters related to flood risk and drainage will be deferred to the masterplan preparation stage and through detailed technical work to support individual planning applications on the Site.





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