Central Lancashire Local Plan - Matters Papers Hearing Statement

Matter 4 Strategic Sites & Mixed Use Allocations - Policy SS5 Preston West

Harworth Estates Investments Ltd

Representor ID: A61

06 November 2025

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

lichfields.uk

70321/02/BOC/AMcL
40225845v3

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 4 - Strategic Sites & Mixed Use Allocations (Policy SS5 - Preston West)

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

- Matter 1b
- Matter 2
- Matter 7
- Matter 8 Issue 8
- Matter 14

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 4 - Strategic Sites & Mixed Use Allocations: Policy SS5 - Preston West

Q4.7 - Why was the site selected as a strategic site? What evidence supports the allocation in terms of:

- **Size**
- **Capacity**
- **Layout**
- **Employment / Housing land split**
- **Infrastructure requirements**
- **Assessment of the effects of development and necessary mitigations**
- **Delivery**
- **Viability**

2.1 The Site has been identified as a draft strategic allocation for a multitude of reasons, primarily its sustainability, accessibility and deliverability. The site is located to the west of the Preston urban area and is therefore situated adjacent to the main Tier 1 settlement in the CLLP settlement hierarchy. Preston is the largest settlement within Central Lancashire and is identified as being 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 benefits from extensive transport links and access to extensive provision of health, education, leisure and cultural services and facilities. Preston also has a strong recent track record of facilitating and delivering large scale extensions such as North West Preston, which was allocated for development in the adopted Central Lancashire Core Strategy (July 2012).

2.2 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. The Site is also located adjacent to the recently completed Preston Western Distributor Road and therefore has excellent access to the strategic road network.

2.3 In terms of deliverability, the Site has been assessed as part of the Council's site selection process throughout 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 a number of detailed assessments[1].

[1] Strategic Flood Risk Assessment (Level 1 & 2) (FR01, FR02 & FR03)
Integrated Assessment (CD05 & CD06)
Habitats Regulations Assessment (CD07)
Highways and Transport Assessment (IT06a)
Heritage Impact Assessment (HE01)

2.4 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'.

2.5 A detailed Preston West Topic Paper (Reference ID TP08) 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.

2.6 Each point set out in Q4.7 is addressed in further detail below.

Size

2.7 The Site measures c. 155.5 hectares and comprises the majority of the land parcels in between the existing Preston urban area and the new Preston Western Distributor Road. The Site is considered to be an appropriate size for a strategic, mixed-use development given its location as a sustainable urban extension to Preston which is the largest settlement within Central Lancashire.

2.8 NPPF 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.

2.9 The evidence base supporting the CLLP, including the 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.

2.10 The Site represents an excellent opportunity to deliver a mix of uses to meet the needs of Central Lancashire authorities over a significant period, capitalising on existing infrastructure and the delivery of the Cottam Parkway Train Station to increase the sustainability credentials of the site and bring forward a large-scale development as soon as possible.

Capacity

2.11 Para. 1) of Policy SS5 sets out that the Site has capacity for the erection of approximately 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 class types B2, B8 and E(g). Harworth considers that this is an indicative capacity and based on initial work undertaken to support the Topic Paper, it is likely that the overall capacity of the Site will be reduced through the masterplanning process. As such, it is envisaged that the quantum of employment land will be reduced to account for site constraints, technical

Utilities access/provision

considerations and other policy and infrastructure requirements. It is expected that the site capacity will be determined further through the detailed masterplanning process, and Harworth therefore advocates an element of flexibility being incorporated within Policy SS5 to facilitate this.

Layout

2.12 An indicative layout has not yet been prepared to support the draft allocation, as it is intended that this will be guided by work relating to the detailed masterplanning process. However, it is anticipated that any indicative layout and proposed development parcels for residential and employment development will respond to the existing site context, as well as planned infrastructure such as the Cottam Parkway Train Station.

Employment / Housing land split

2.13 In terms of the proposed split of uses, Policy SS5 identifies capacity for 1,850 new dwellings, and up to 63.3 ha for employment uses within this area. This is effectively an equal split based on the gross developable area of the site. Harworth considers that this is an indicative split of uses, and the site is likely to be more suitable for residential development given its existing context. It is considered that there is scope to reduce the quantum of employment land required as part of the policy.

2.14 As set out in the Topic Paper (TP08), the vision for Preston West is to deliver a residential-led mixed use development and the assumptions made within draft Policy SS5 regarding the proportion of land expected to deliver residential and employment uses is indicative. The mix of land uses will be determined through the masterplanning process based on more detailed evidence of the constraints, residential and employment market and logistics. There is considered scope to be flexible in the amount of land expected to accommodate residential, employment and/or other uses, provided that the resulting development creates an accessible and mixed-use sustainable settlement and contributes to meeting identified needs.

2.15 Harworth considers that the proposed split as set out in the draft policy 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 Train Station.

2.16 In addition, the evidence base does not provide clear commercial rationale for proposing an arbitrary 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. 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.

2.17 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 the location is better placed to deliver a residential led, mixed-use development. Therefore, it is important that flexibility is incorporated into the policy to enable the land requirement for the employment element of the policy to be reduced during the masterplanning process to reflect these considerations.

Infrastructure requirements

2.18 The 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 access into the southern parcel which is likely to take the form of a new junction off Edith Rigby Way.

2.19 As set out in the Topic Paper (TP08), a bespoke infrastructure delivery schedule will be developed for the site and included within the masterplan, as required by Policy SS5. This will utilise the IDP and IDS (IT04b), and other evidence where necessary as a basis.

Assessment of the effects of development and necessary mitigations

2.20 The Topic Paper (TP08) outlines the issues and constraints on the Site, 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 includes detail on a number technical considerations with consideration of potential appropriate mitigation.

2.21 The Topic Paper, together with existing and supplemental evidence, will form the basis for the completion of a Masterplan which will guide development.

Delivery

2.22 It is intended that the delivery of the Site will be guided by a detailed masterplanning process. Harworth has an interest in the majority of the land across the site, including the Tallentine land, and intends to work closely with all stakeholders, including the Council, to create a comprehensive masterplan for the site. This will be informed by the evidence and information referred to throughout the Topic Paper and additional site-specific evidence where it is required.

2.23 As set out in para. 3) of Policy SS5, the site is split into two development phases. Phase A North of the Railway and Phase B south of the Railway. Phase A is expected to come forward within the plan period, and land within this phase is safeguarded to enable delivery

of Cottam Parkway Train Station, which was granted planning permission in September 2023 (LPA ref. LCC/2022/0049).

2.24 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.

2.25 A large proportion of Phase B also comprises the existing Ashton and Lea Golf Club. The land is subject to a long term lease which could limit the timing of delivery. As set out in the Topic Paper (TP08), the golf course is in private ownership (Tallentine Ltd) and it is currently let to Ashton & Lea Golf Club. The lease was granted to the Club on 12th February 2007 and runs to 1st February 2045. Discussions with the Club have already taken place in respect of a potential earlier surrender of the lease and these discussions are expected to continue between Tallentine and the Club. Legal mechanisms exist to terminate the golf club's interest in the land at the expiration of the lease.

2.26 The existence of the lease is therefore not seen as an 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.

Viability

2.27 The Topic Paper (TP08) sets out considerations relating to viability (para. 5.13-5.17). The Central Lancashire Local Plan Viability Main Viability Report (IT05) notes that bringing in a master developer with the right experience and knowledge of developing strategic sites of this nature will give the opportunity to further mitigate risks and ensure the site is deliverable. Harworth controls the majority of the Site and is an established development company with a track record of delivering strategic sites. Furthermore, it is clear that there is a market appetite to develop in this location and that development can be viably achieved. This is evidenced by recent planning permissions for major residential development (totalling 281 dwellings) granted to the east of the Site (Ref: 06/2022/1101).

2.28 Harworth considers that the Site is located in a viable location for residential development and an element of employment development. It is also important that Policy SS5 allows for sufficient flexibility within the specific policy requirements, to ensure viability is not adversely affected. 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.

Q4.8 - Does the policy provide sufficient information on site specific constraints and requirements such as the physical and social infrastructure that may be required as part of the development?

2.29 Yes. Policy SS5 sets out an appropriate level of detail in relation to site specific constraints within the Key Development Considerations, which has been further supported by the preparation of a Topic Paper (TP08) providing more detailed technical assessment. This includes more detailed information on relevant physical and environmental constraints that must be taken into account to inform the masterplanning process and does not need to be included in the body of the policy.

2.30 The policy also sets out physical and social infrastructure requirements that may be required as part of the development such as new retail and community facilities, involving a new district and/or local centre, a smaller scale local or neighbourhood centre, new access points to enable development of Phase B, and land to deliver a new primary and secondary school. 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. Further detail on these points, and some suggested alternative wording for the development considerations, are set out in Harworth's Reg. 19 representations (paras. 4.18-4.29).

Q4.9 Does policy SS5 provide clear direction as to how a decision maker should react to a development proposal? Are there any necessary modifications to the policy?

2.31 Policy SS5 sets out clear requirements that a future development proposal would be required to meet, as set out in the key development considerations (a-k). The policy also requires the development of a detailed masterplan, which should include the preparation of a Design Code and Infrastructure and Delivery Strategy covering the whole of the allocation. The policy requires that this will be assessed by a Design Review Panel and must be agreed by the Council prior to the granting of planning permission on any remaining part of the site.

2.32 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.

2.33 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.

Birmingham
0121 713 1530
birmingham@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk