# Central Lancashire Local Plan - Matters Papers Hearing Statement

# Matter 14 Sustainable Travel, Infrastructure and Delivery, and Monitoring

**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 14 - Sustainable Travel, Infrastructure and Delivery, and Monitoring

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

- Matter 1b - Overarching Matters
- 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

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 14 - Sustainable Travel, Infrastructure and Delivery, and Monitoring

### 14.3 a) Do Policies ID1-ID3 provide an effective framework to ensure the delivery of the necessary infrastructure?

2.1 Policies ID1-ID3 set an initial framework to ensure the delivery of necessary infrastructure, which is supported by site specific infrastructure requirements within the strategic policies.

2.2 In terms of Preston West, Policy SS5 references Policy ID1 and states that an infrastructure delivery schedule linked to the phases of development on the site will be required. It is anticipated that a bespoke infrastructure delivery schedule will be developed for the Site and included within an approved masterplan, as set out in detail in the Topic Paper (TP08). This will utilise the updated Infrastructure Delivery Schedule [IDS] (September 2025) and the Infrastructure Delivery Plan [IDP] Update (September 2025) (IT04b), and other evidence where necessary. Policy SS5 also references Policy 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. Harworth supports the approach set out in the emerging plan.

2.3 However, Harworth has some concerns in relation to viability considerations and the effectiveness of Policies ID1 and ID2 in this regard, as set out in responses to 14.3 (b), (c) and (d) below.

### b) Are the policies requirements supported by up-to-date evidence? How will the requirements of the policies be kept up to date?

2.4 An updated Infrastructure Delivery Schedule (September 2025) and an Infrastructure Delivery Plan Update (September 2025) have been published as part of the evidence base to support policies within the Plan. These provide up to date information in relation to key infrastructure requirements across the Central Lancashire authorities within the plan period, to inform infrastructure requirements and ensure the delivery of strategic scale development can be facilitated.

2.5 It is expected that the requirements of the relevant policies should include wording to reference the annual publication of an Infrastructure Funding Statement (IFS). This should then provide the basis to update requirements each year and to identify infrastructure needs, the total cost of this infrastructure, anticipated funding from developer contributions and the choices the LPA has made about how these contributions will be used. Harworth considers that inclusion of this wording is important to provide future flexibility and ensure the requirements of the policies can be kept up to date. In this regard, Harworth would also welcome clarification from the Council as to the mechanism or process required to incorporate key infrastructure requirements linked to the detailed masterplan work, within the updated IDP and the annual publication of an IFS.

2.6 Policy ID2 also includes 'biodiversity offsetting' which has been included as a potential contribution. It is not clear what evidence has informed this requirement or the contributions which 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.

2.7 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 PPG[1] 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.

2.8 Policy ID2 should therefore 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 as there is no evidence to support this.

**c) Have the implications of policies ID1 and ID2 in relation to viability been appropriately tested? Are the assumptions in the Local Plan Viability Report (Doc IT05) reasonable and up to date and do they adequately reflect the scale and cost of infrastructure requirements for development in the Borough as set out in the revised Infrastructure Delivery Plan?**

2.9 Harworth does not consider that the implications of policies ID1 and ID2 in relation to viability have been appropriately tested.

2.10 In terms of Preston West specifically, the updated IDS includes the New Cottam Parkway Rail Station which states that costs are being reviewed as part of the Full Business Case, and confirms that funding for the station has been agreed by LCC and the government (subject to approval of a business case) and is not reliant on other external funding.

2.11 However, the Preston West site will also 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 either 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, but is not clear how this is expected to be funded and the role of CIL in providing funding assistance. The updated IDP also notes that the School Planning Team has identified a need for future school capacity in Preston West as follows:

- Primary: 2 form entry (FE)
- Secondary: 5.5 FE

2.12 It should be noted that the School Planning Area for Preston West includes a large portion of North and North West Preston significantly beyond the proposed Preston West strategic

[1] Paragraph: 036 Reference ID: 23b-036-20190901

site (SS5). As such, at this stage, it is not clear how these will be funded and whether they would be covered by CIL receipts in their entirety. The IDS also includes a new bus service along A582 Riversway and Edith Rigby Way with an estimated cost of £3m. It is not clear where this funding is expected to be generated from or if this will be funded through CIL receipts.

2.13 Regarding Policy ID2, Policy SS5 references the policy 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. 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.

2.14 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.

2.15 The requirements in policies ID1 and ID2 should be clearly factored into viability considerations. The 2023 NPPF (para. 57) 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 landowners.

2.16 To conclude, Harworth considers that Policies ID1 and ID2 have not been appropriately viability tested. Harworth also considers that the policies should incorporate a clear link to the IDS and IDP, which should then specifically identify which key infrastructure projects are required to facilitate delivery of strategic sites and whether they will be partly or wholly funded through CIL receipts. This could then be factored into the wording and requirements of Policy SS5, with appropriate flexibility factored in, to ensure clear funding mechanisms are in place at the plan making stage.

### d) Are the policies sufficiently flexible? Do they take appropriate account of development in cases where viability is below that which would be policy compliant?

2.17 Harworth considers that additional flexibility should be incorporated into both Policies ID1 and ID2, as set out in previous responses to (b) and (c), to ensure viability considerations do not restrict or prevent development particularly on large scale strategic allocations which may require significant upfront infrastructure delivery.

2.18 In particular, it is expected that the requirements of the relevant policies should include wording to reference the annual publication of an Infrastructure Funding Statement (IFS). This should then provide the basis to update requirements each year. Harworth considers

that inclusion of this wording is important to provide future flexibility and ensure the requirements of the policies can be kept up to date.

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