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Regulation 19 Consultation
Planning Policy Team
Third Floor
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Lancaster Road
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Date: 11 April 2025

Our ref: 68743/02/BOC/AGa/33516081v1

Dear Sir/Madam

Representation to Central Lancashire Local Plan 2023-2041 Regulation 19 Publication Version Consultation

This representation is made by Lichfields on behalf of Taylor Wimpey UK Limited [Taylor Wimpey] in response to the publication version of the Central Lancashire Local Plan 2023-2041. These representations are made specifically in the context of Taylor Wimpey's land interests at the land to the east of New Street, Mawdesley which is identified as draft housing allocation ref. HS2.26 'Land to the east of New Street, Mawdesley' [Figure 1]. From the outset, it should be noted that Taylor Wimpey supports this draft allocation but does not support the evidence behind the Local Plan. Taylor Wimpey has prepared separate representations which look at the evidence base in detail.

Figure 1 Land to the east of New Street, Mawdesley



Support for Housing Allocation ref. HS2.26 ‘Land to the east of New Street’

Taylor Wimpey strongly supports draft allocation ref. HS2.26 ‘Land to the east of New Street’. Taylor Wimpey wishes to take this opportunity to reaffirm the valuable contribution this site will make to ensuring a sufficient supply of land to deliver homes within Chorley.

Paragraph 73 of the National Planning Policy Framework [NPPF] confirms that “*small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilding to deliver new homes and are often built out relatively quickly*”.

The draft allocation ref. HS2.26 extends to approximately 1.5ha and has an indicative capacity for 41 dwellings. In line with paragraph 73 of the NPPF, this draft allocation represents a medium sized site which is located within the settlement boundary of Mawdesley, in the southwest area of Chorley. The site is bound on all sides by existing built development comprising predominantly residential properties. The site represents a logical infill site within the Mawdesley settlement boundary.

The draft allocation has no constraints that would prevent development coming forward. The draft allocation:

- Is entirely located within Flood Zone 1 with a small area of surface water flood risk in the central part of the site;
- Comprises no designated heritage assets on, or within close proximity to the site;
- Is not located within a Conservation Area;
- Comprises trees protected by Tree Preservation Order’s however the site has no special ecological or landscape designations;
- Is classified as Grade 3 Agricultural Land; and,
- Is not located within the Green Belt.

Whilst there is no existing access infrastructure to the site, the site benefits from direct frontage onto New Street to the west, or off Tarnbeck Drive from the north. In addition, an ecology survey has been undertaken for the site which found the woodland on-site to be in ‘poor’ condition and low value, equating to just 6 habitat units within the BNG metric.

The site is under the control of a national housebuilder with considerable experience of delivering homes in Chorley and Lancashire more generally. This expertise will ensure that the site can come forward and be delivered as quickly as possible.

Response to Draft Policies

It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is “sound”, as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). S.19 of the 2004 Act stipulates that, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF.

The policies proposed within the publication version of the Central Lancashire Local Plan relating to residential development have been reviewed and comments have been provided in turn.

Draft Policy SS1: Development Patterns

Draft Policy SS1 seeks to focus new housing in the most sustainable locations in Central Lancashire where it can benefit from, and/or provide, a range of facilities. Part 3 of the draft policy states that *“new development will be focused within settlement boundaries and on allocated sites as shown on the Policies Map”*.

Taylor Wimpey supports part 3 of this policy in the context of draft allocation ref. HS2.26 ‘Land to the east of New Street’. The draft allocation is located within the Mawdesley settlement boundary and is capable of coming forward to meet Chorley’s short-term needs.

Inclusion of this draft allocation is especially important given the context of the recent changes to the NPPF which sets out the Government’s objective to significantly boosting the supply of homes through a sufficient amount and variety of land, and Chorley’s latest supply position. Chorley’s latest Five-Year Housing Land Supply Statement (2024) claims a housing land supply equivalent to 2.9-years, based on an annual requirement of 506dpa. Under the new standard method [SM3], Chorley’s annual housing requirement has increased to 564dpa, further worsening the Council’s housing land supply position. Facilitating the delivery of small/medium sized sites that are sustainably located is critical in supporting Chorley’s increased housing requirement, as well as Chorley’s affordable housing needs. Facilitating affordable housing delivery in Chorley is especially important given that Chorley’s affordability ratio of 6.1 is higher than the northwest average of 5.9 according to the Office of National Statistics 2024 data (published March 2025).

Draft Policy SS2 (Settlement Hierarchy)

Draft Policy SS2 (Settlement Hierarchy) sets out the settlement hierarchy to ensure development is distributed to and takes place in the most sustainable and appropriate places through a plan-led system. Paragraph 3.16 of the supporting text confirms that an appropriate level of development in smaller and rural settlements is important in supporting the economic vitality and viability of local communities, and the type of development proposed in all settlements must be appropriate to the scale and character of the settlement.

Table 1 within the draft Plan presents the Settlement Hierarchy and identifies Mawdesley as a ‘Tier 5 ‘Smaller Rural Villages and Hamlets’ settlement. Draft Policy SS2 states that *“Smaller Rural Villages and Hamlets (Tier 5) will accommodate more limited new development and investment, other than on the sites identified on the Policies Map”*.

The draft allocation ref. HS2.26 represents a sustainable development opportunity with no obvious constraints within the settlement boundary of Mawdesley and should be retained as an allocation as the draft Plan progresses.

Draft Policy HS6: Housing Mix and Density

Draft Policy HS6 (Housing Mix and Density) states that all housing developments of 10 or more dwellings 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.”

Taylor Wimpey considers that flexibility should be provided for within the policy by presenting the required mix as a range to allow site-specific considerations to be accounted for. It is important that site specific considerations are taken into account, including viability and market demand, when considering a site’s proposed housing mix, as long as it is in broad alignment with the recommendations in the Housing Need Demand Assessments.

Whilst Taylor Wimpey is committed to delivering homes to an M4(2) accessible and adaptable standard, a deliverability appraisal should be undertaken by the Council to assess the implications of this policy requirement, before enforcing that development ‘must’ meet the requirements included within the policy.

The draft policy goes on to state that for housing developments in ‘other locations within settlement boundaries’, the minimum gross density should be 27 dph. In its current form, the proposed wording does not provide enough flexibility to account for the reduction in gross to net developable area as a result of a series of legal and national planning policy changes, including the statutory requirement to provide 10% in biodiversity net gain. This policy should be amended updated to include minimum net densities, so that it is sufficiently flexible for sites on which large parts are not developable.

Draft Policy HS7: Affordable Housing

Draft Policy HS7 requires all residential developments of 10 or more dwellings to deliver a minimum of 35% affordable housing on sites in Tier 5 settlements. The draft policy goes on to set out the proposed tenure split to 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. For Chorley, 71% social rent and 29% affordable home ownership including first homes is required.

Whilst Taylor Wimpey welcomes the flexibility to provide an alternative tenure split if it can be independently proven, this policy would benefit from a required range, rather than specific percentages, to provide reasonable flexibility and allow site specific considerations to be accounted for.

Draft Policy EN1: Well Designed Places

Part 4 of this policy states that *“Significant schemes will be required to provide a Masterplan, parameter plans, and a design code in support of their application”*. The current wording of this part

of the policy is vague and requires refinement to confirm what would be considered a ‘*significant scheme*’. Taylor Wimpey encourages the Council to confirm within this policy that the requirement for a Masterplan, parameter plans, and a design code should be applied to the strategic site allocations only and would be disproportionate for sites such as this. Where masterplans have previously been submitted and approved as part of a planning permission, the policy wording should be updated and made clear that reserved matters submissions should accord with the approved masterplan, and no duplicate/revisions to the masterplan would be required.

Draft Policy EN8: Trees, Woodland and Hedgerows

Draft Policy EN8 part 6 states that “*where it has been demonstrated by the applicant that there will be an unavoidable loss of trees and/or hedgerow in order to facilitate the proposal, then appropriate mitigation via compensatory planting will be required. Tree planting shall be provided on-site at a ratio of 2 trees per 1 loss, and loss of hedgerow shall be compensated for by planting of an equal or greater length of hedgerow to the length lost*”.

The proposed provision ratio, which would require a developer to provide 2 trees per 1 loss and loss of hedgerow, places a constraint upon the developer from a viability and deliverability perspective. The requirement to deliver 2 trees per 1 lost would have a serious implication upon the efficiency of land use on a site, site layout and highways considerations. Part 6 of draft Policy EN8 should therefore be removed.

Draft Policy ID2: Developer Contributions and Planning Obligations

Taylor Wimpey acknowledge that contributions are required to facilitate development however it is critical that the level of contributions are reasonable and proportionate to the development (NPPF paragraph 35).

Policy ID2 states that a monitoring fee will be charged by the Council to cover the cost of monitoring and delivery of S.106. It is imperative that the monitoring fees are fair and reasonable, and the sum paid cannot exceed the authority’s estimate of its costs for monitoring over the lifetime of the planning obligation (Regulation 122 (2A) of the CIL Regulations 2010). Recognition of the specific requirements of the CIL regulations should be referenced within Policy ID2.

Summary

Taylor Wimpey strongly supports housing allocation ref. HS2.26 ‘Land to the east of New Street, Mawdesley’ but does not support the evidence behind the Plan as a whole. Taylor Wimpey requests that the Council makes the recommended changes to:

- Draft Policy HS6: Housing Mix and Density to allow flexibility to accommodate site specific considerations with regards to mix, accessible and adaptable standards and density requirements;
- Draft Policy HS7: Affordable Housing to accommodate an appropriate range for the tenure split;
- Draft Policy EN1: Well Designed Places to confirm that the requirement for a Masterplan, parameter plans, and a design code should be applied to the strategic site allocations only (Policy HS2);

- Draft Policy EN8: Trees, Woodlands and Hedgerows to remove part 6 which details the requirement to provide 2 trees per 1 lost, and hedgerow compensation provision; and,
- Draft Policy ID2: Developer Contributions and Planning Obligations to provide recognition of the specific requirements of the CIL regulations within the policy text.

If the Council requires any further information in relation to this site to demonstrate Taylor Wimpey's commitment to its delivery or to demonstrate that it is developable, please contact us.

Yours faithfully



Alexandra Gavin
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