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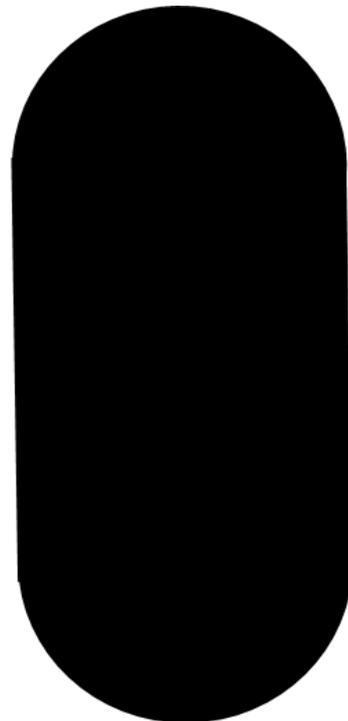
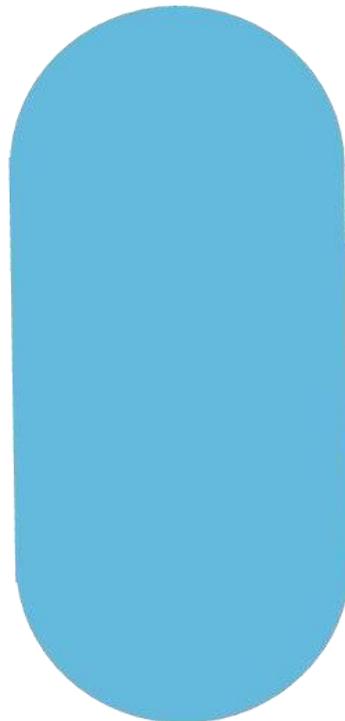
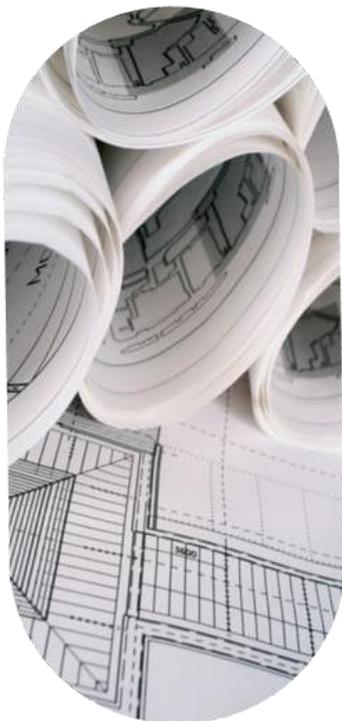
Central Lancashire Local Plan

Examination in Public

Matter 7 – Housing Policies

Taylor Wimpey UK Limited

November 2025



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1. Introduction

- 1.1. This response to Matter 7 of the Inspectors' MIQs in respect of the Central Lancashire Local Plan (CLLP) Examination in Public has been prepared by Marrons on behalf of Taylor Wimpey.
- 1.2. This hearing statement should be read alongside previous representation to the Regulation 19 Consultation submitted by Marrons on behalf of Taylor Wimpey and should be considered in the context of support for a plan led system.
- 1.3. Acting on behalf of our clients, Marrons will attend the Matter 7 Hearing Session and make further oral submission on behalf of our client. This statement outlines Taylor Wimpey's comments in respect of Matter 7, with responses to the Inspectors' MIQs (Matter 7) are set out below.
- 1.4. In order to assist the Inspectors', the contents of this submission and the submissions made in respect of other matters, demonstrate that the submission version of the Plan is not, in our assessment, capable of being found sound, without significant additional evidence and the identification of additional sites in sustainable locations to accommodate housing growth over the Plan period.
- 1.5. These submissions reflect the position outlined by Housing Minister Matthew Pennycook in a letter to the Chief Executive of the Planning Inspectorate in July 2024 with regard to the continued use of 'pragmatism' in the Examination of Plans and the recognition that any fundamental issues or areas of additional work that require a pause of more than six-months in the Examination process, should indicate that a Plan is incapable of being found sound. As such, in accordance with the above consideration, we do not believe that the Plan is capable of being found sound noting that the degree of additional work we consider to be required to make the Plan sound would require a pause in the examination in excess of 6 months.
- 1.6. In making this submission, we also reflect the more recent letter from Housing Minister Matthew Pennycook to the Chief Executive of the Planning Inspectorate in October 2025 which revokes the letter issued in March 2014 by the then Minister Nick Boles, and makes

clear that where it would assist in ensuring a plan can be made sound, Inspectors can advise during examinations that a Green Belt review should be undertaken.

1.7. We consider that the spatial strategy and site selection process is totally flawed, as it does not meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (“the SEA Regulations”). There has been a failure, specifically in relation to the IA, to consistently and robustly consider all reasonable alternatives contrary to Regulation 12 and Schedule 2, paragraph 8. For instance, Green Belt sites were excluded from consideration, including those that are demonstrably sustainable and deliver more socioeconomic and environmental benefits than selected Brownfield sites. As such, we do not consider that the Plan is capable of being found sound.

2. Matter 7 – Housing Policies

Q7.1 - a) Are the requirements in Policy HS5 for the provision of open space and playing pitches by housing developments justified by robust and up to date evidence? Is there convincing evidence that the open space requirements can be viably provided?

b) Is the policy sufficiently clear regarding the approach to be taken for off-site and/or financial contributions in lieu of on-site provision?

2.1. No response

Q7.2 - a) Does Policy HS6 provide an effective framework for ensuring an appropriate mix of housing will be delivered over the plan period? Does it provide sufficient flexibility to ensure site specific considerations are taken into account?

b) Are the requirements relating to the provision of homes that comply with M4(2) and M4(3) of the building regulations justified by evidence relating to need and viability and are they consistent with national policy? Would it ensure the needs for specialist housing will be met over the plan period?

c) Are the minimum density requirements justified and appropriate? What account has been taken in the density requirements for the delivery of on site BNG?

d) Are there any omissions in the policy?

2.2. Draft Policy HS6 is not considered to be sound, justified, nor effective, and is inconsistent with national policy.

2.3. While we are supportive of offering a range of different homes to suit a range of needs, it is clear that Draft Policy HS6 requires additional flexibility to ensure that assessment can take place on a site-by-site basis. The policy requires that any market and affordable housing development proposals that will deliver over 10 dwellings must: offer a variety of homes sizes and types to meet the needs of the area as determined by the Housing Need and Demand Assessment; construct all homes to M4(2) standards; and construct at least 4% of affordable homes on sites in Preston and Chorley to M4(3) wheelchair accessible standards.

- 2.4. It is critical that Draft Policy HS6 ensures that the provision of housing is not restricted nor delayed by unduly rigid requirements, for instance requiring a mix that completely ignores crucial specificities including site size. Further, we consider that the policy does not fully account for viability and would place an undue evidential burden on applicants. For example full compliance with M4(2) is often not viable or feasible to achieve for some housing typologies, such as flats over garages, maisonettes, and low-rise apartments. Such typologies are likely to be needed in order to deliver sites at the densities the plan envisages. It is therefore important that this policy incorporates greater flexibility to allow for assessment on a site-by-site basis and appropriate adjustments where justified.
- 2.5. In addition, reference should be made to the PPG's (ID:56-007-20150327) criteria if the Council intends to adopt higher optional standards for wheelchair-accessible, adaptable, and accessible dwellings. The probable future need, the size, location, type, and quality of the dwellings required, the accessibility and adaptability of the current stock, the ways in which the needs differ across various housing tenures, and the overall viability are among the types of evidence that the PPG identifies as necessary to introduce a policy requiring the M4 standards. The Council's are thus required to present a local assessment demonstrating specific need in Central Lancashire for the CLLP to support an optional increased standard for accessible and adaptable dwellings.
- 2.6. As regards minimum density requirements, we consider that greater flexibility is required, and that density should be measured per net hectare and not per gross hectare to account for reductions in developable area due to national policy requirements such as BNG and the inclusion of Sustainable Urban Drainage systems.
- 2.7. We consider that the evidence base underpinning the housing need and draft housing mix policies are incredibly rigid and provide only a limited snapshot in time. As such, it is important that greater flexibility is evidenced in Policy HS6 in order to respond to changes in circumstance and needs at the time of an application being submitted to the relevant Local Planning Authority. This would support the creation of a much more robust and sustainable local plan moving forward, allowing for development opportunities to make better use of available land whilst dynamically respond to evolving housing needs.

- Q7.3 - a) Does Policy HS7 provide an effective framework for maximising the delivery of affordable housing over the plan period? Based on the thresholds and requirements in Policy HS7, will affordable housing needs be met?**
- b) Is there convincing evidence to show that affordable housing requirements, including on specialist older persons housing, would be viable? How were the thresholds for affordable housing and areas in which they apply arrived at? Are they based on comprehensive and up to date information? Is the use of “pragmatic scenarios” within the Whole Plan Viability Assessment a reasonable approach?**
- c) Is there convincing evidence to justify the proposed tenure split for affordable housing units? Does it accurately reflect the requirements for affordable housing in the Housing Needs and Demand Assessments? Is it sufficiently flexible?**
- d) Is the policy sufficiently clear regarding the approach to be taken for off-site and/or financial contributions in lieu of on-site provision? Is the 20% supplement for commuted sums justified?**

2.8. While we completely support the Council's pursuit of securing affordable housing to meet the needs of local communities across the borough, Paragraph 35 of the Framework clearly sets out that delivery of affordable housing should consider both need and the effects of development on viability. Draft Policy HS7 requires all residential development of 10 or more dwellings to deliver affordable housing within a minimum of 30% in Preston; the Key Service Centres; and the Urban Local Service Centre, and a minimum of 35% on sites in all other locations. The policy also provides a tenure split for the affordable homes, which differs slightly from 71% social rent and 29% affordable home ownership in Chorley; to 52% social rent and 24% affordable home ownership in Preston; to 45% social rent, 32% affordable rent and 23% affordable home ownership in South Ribble.

2.9. With regard to the proposed affordable housing thresholds, targets between 30-35% appear high when considered against prevailing residential sales rates experienced. Furthermore, a more flexible approach to tenure split is encouraged and to remove any rigidity and allow for site-by-site considerations to be accounted for, draft Policy HS7 should include a required range as opposed to specific percentages.

2.10. Aligned with our comments in relation to Matter 2, the CLLP's proposed spatial strategy and allocated sites relies too heavily on development on brownfield land and

SUE's. Consequently, there is likely to be reduced provision of affordable housing delivered across the plan area, raising serious concerns about meeting affordable housing needs. The Affordable Housing Topic Paper (September 2025) identifies that there is a significant need of around 7,884 additional affordable dwellings in the draft plan period. Further it highlights that the delivery of social rented housing in Chorley and Preston remains disproportionately low and misaligned with identified needs, while South Ribble has consistently experienced an annual net shortfall in overall affordable housing provision. Thus, aligning with our comments on Matter 2, it is unacceptable that the Council have focused their strategic allocations and spatial strategy on mostly brownfield sites, many of which (specifically in Chorley) are limited in scale, when there are more sustainable locations, including Green Belt sites, that can help deliver a diverse supply of housing types including much-needed affordable housing.

2.11. Section 6 of the Viability Report (February 2025) also highlights the need to allocate a variety of sites in the CLLP and provides justification for the concerns we have with Central Lancs current proposed spatial strategy. The Report displays that lower value Brownfield types, lower value greenfield types, and the Preston City Centre types are unviable; while the medium value brownfield types, medium value greenfield types, higher value brownfield types, and higher value greenfield types are either unviable or marginal when assessed against a framework of fully policy compliant appraisals, realistic land values, and a 20% profit. Even in the 'pragmatic' scenario, viability issues persist. It is explicitly stated in the report that "*all typologies within the lower value zones are unviable, along with all typologies assessed within Preston city centre, where elevated construction costs and site limitation create challenges to viability.*" The three Council's all operate CIL charging schedules, which adds further inflexibility, particularly given CIL rates have not been reviewed as part of the Local Plan viability testing.

2.12. It is therefore evident that there is a pressing need to allocate a broader variety of sites, including sustainably located land within the Green Belt and Open Countryside, to facilitate the delivery of affordable housing and minimise viability issues. Such allocation would contribute meaningfully to addressing the acute affordable housing need and ensure a more robust and balanced spatial strategy. Further, increased flexibility is required in the Local Plan to encourage site-by-site viability assessment and improve deliverability. The Council should refer to the PPG (ID:10-002-20190509) which sets out that policies within plans should be realistic and deliverable.

2.13. It is clear of our concerns that the plan in its current form will not meet the obvious and evidenced affordable housing need of the plan area. The Councils need to reconsider its overall housing requirement to ensure it adequately responds to all identified needs. Further, aligning with our comments on Matters 2 and 5, the Councils need to completely reconsider their spatial strategy and allocate additional sites in locations where viability is demonstrably stronger, thereby enhancing the potential for delivering affordable housing to meet the identified need.

Q7.4 - a) Is the approach to rural exception sites in policy HS8 justified? Would it provide an effective framework?

b) Are there any omissions in the policy, and is it sufficiently flexible?

2.14. No response

Q7.5 – Is the approach in Policy HS9 justified and is it consistent with national policy??

2.15. No response

Q7.6 – Is the approach in Policy HS10 justified and is it consistent with national policy?

2.16. No response

Q7.7 - Does Policy HS11 provide an effective framework to ensure the delivery of an adequate supply of custom and self-build plots over the plan period? Is the policy consistent with national policy?

2.17. No response

Q7.8 - Does Policy HS12 provide an effective framework that would ensure the needs for specialist housing will be met over the plan period? Does the evidence provide a robust assessment of the need for specialist housing? Given the need for older persons housing in particular outlined in the HNDAs, is a criteria based approach to meeting this need appropriate?

2.18. No response

Q.7.9 - a) Does Policy HS13 provide an adequate framework to ensure the need for accommodation for Gypsy and Travellers and Travelling Showpeople can be met as required by national policy? Is the Central Lancashire Gypsy and Traveller and Traveling Showpeople Accommodation Assessment 2024 Update robust in its identification of needs for pitches and plots?

b) Is Policy HS13 a positively prepared, justified and effective approach to planning for the accommodation needs for gypsies, travellers and travelling showpeople? Does the Council's approach in relation to traveller sites generally conform with the expectations of Planning Policy for Traveller Sites? Has a robust and objective process been used to identify potential sites across the plan area?

c) Are the requirements of the policy justified, clear and would they be effective?

d) Are there any omissions in the policy, and is it sufficiently flexible?

2.19. No response



 **Marrons**

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